

# The Heritage Practice

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10 November 2023

Planning portal  
Reference: PP-12570789

Dear Daren

## 21-23 Bedford Place, London, WC1B 5JJ

We write on behalf of the owners of the above property (hereafter referred to as "the applicant") to submit a Planning and Listed Building Consent application to the London Borough of Camden.

This application is submitted as a stand alone permission for alterations to 21-23 Bedford Place, London, WC1B 5JJ (hereby referred to as the 'the site').

### The Site

The site comprises a hotel (class C1) located on the west side of Bedford Place, close to the northern junction with Russell Square. The building comprises three former Georgian townhouses which are grade II listed. It forms part of the symmetrical terrace of 20 houses at nos. 1-20 and 21-40 Bedford Place, forming the west side of Bedford Place. The terrace was listed in 1969.

The site has been occupied as a hotel for over 100 years and has been laterally connected for at least the same period of time. The hotel was previously occupied by the Penn Club Hotel. Bedford Place, as well as Montagu Street to the west, contain many hotels a use which is long established in these streets due to their proximity to internally renowned visitor attractions such as the British Museum.

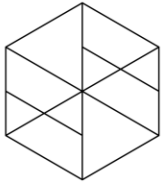
The site forms part of the Bedford Estate and was constructed c.1815 by James Burton. The site is also located within the Bloomsbury Conservation Area.

### Application Proposals

The existing hotel use will be retained. The existing hotel is vacant and in need of refurbishment and modernisation. The application proposal seeks to upgrade the hotel so that it provides high quality inclusive visitor accommodation.

Proposed internal and external alterations include:

- Insertion of the lift to the rear of the main staircase at no.22 Bedford Place;
- Erection of lower ground floor conservatory style infill extensions;
- Minor increase in the depth, by approximately 1.5m, of the existing non-original closet wing extensions at first and second floor levels;
- Replacement of non-original windows;
- Additional plant at roof level and within the rear courtyard;
- Creating of a terrace to the upper ground floor garden level;
- Modifications to the internal layout including the provision of en-suite bathrooms



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## Application overview

The application has been submitted through Planning Portal (ref. PP-12570789 ) and is made up of this cover letter and:

1. Planning Application Form, including relevant Ownership Certificate;
2. Design and Access statement prepared by SPAARC
3. Heritage Statement prepared by The Heritage Practice
4. Energy Statement prepared by Meinhardt
5. BIA Screening Opinion prepared by CGL
6. Fire Strategy report OFR
7. MEP drawings prepared by Meinhardt
8. Structural Report prepared by DDA
9. Acoustic Report prepared by Clark Saunders
10. Breeam Assessment prepared by Meinhardt
11. Full set of Existing, Demolition, Proposed and detailed drawings prepared by SPAARC

A list of the proposed drawings are set out in the drawings schedule

## Overall Area Schedule

The existing floor area is 1764sqm. There will be a net increase of 64.sqm of GIA floor area. The proposed floor area will be 1828sqm.

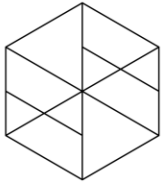
## Planning Assessment

### Land use

Permission is sought for refurbishment works, extensions and associated internal and external alterations to create a 42 room hotel. Two of the rooms would be fully accessible, one room is ambulant.

The Applicant is Firmdale Hotels. They are established hotel owners and operators and intend to refurbish and operate the hotel for their own use.

Firmdale Hotels is a luxury hotel group started in 1985 by Tim and Kit Kemp. It comprises 8 boutique hotels in London including Ham Yard, The Soho, Covent Garden, Charlotte Street, Haymarket, Number Sixteen, Knightsbridge and Dorset Square, as well as The Whitby and Crosby Street hotels in New York. Each hotel has an individual style and is situated in a variety of neighbourhoods within close proximity to leading museums, galleries and theatres as well as shops, restaurants, parks and gardens.



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Firmdale is innovative in its field. It has acquired dilapidated properties and created from them five star luxury hotels which are internationally regarded and respected. In doing so, Firmdale has injected new energy and life into neglected spaces, and the immediate areas have been transformed and given new life.

Policy E3 in the Camden Local Plan acknowledges the significance of tourism in Camden's economy. Similarly, Policy E13 in the London Plan recognizes the importance of visitor infrastructure. According to Paragraph 6.10.2 in the supporting text, London is projected to require an additional 58,000 visitor bedspaces by 2041, averaging 2,230 per year.

The enhancement of the existing hotel to provide upgraded modern facilities in a street known for hotels, near key visitor attractions, align with the local and regional planning policies and constitute a clear planning benefit.

Furthermore, the hotel's upgrade ensures the optimal viable use of a listed building, guaranteeing its long-term preservation for the enjoyment of visiting members of the public. These public benefits deserve strong support and should be given considerable weight in the planning balance.

## Heritage

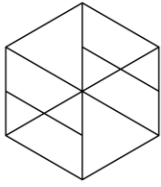
The main issues for consideration in relation to this application are the effect of the proposals on nos.21-23 Bedford Place as listed buildings and the impact of any external changes on the character and appearance of the Bloomsbury Conservation Area. The relevant statutory provisions are contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 at sections 16 and 72.

The site originally consisted of three separate terraced houses, dating from 1815. These broadly conformed to the standard two room deep plan form for terraced townhouses which first emerged in the late 17th century, and which had become increasingly standardised throughout London and the inner suburbs by the early 19th century. Typically, this included two rooms at each floor level, arranged off a stair compartment situated adjacent to the party wall. Consistent with the hierarchy of status within houses of this period, the principal spaces were situated at ground and 1st floor levels with areas of secondary importance for servants and children's bedrooms within the basement and to the top floor.

As a result of this longstanding hotel use and the degree of subdivision and alteration which the buildings have sustained, their original plan form, spatial quality, circulation pattern and internal character has been overlaid and undermined over time. This has had an inevitable detrimental impact, particularly given the lateral conversion between the three buildings at all floor levels, the installation of partitions to create smaller hotel rooms and the extensive provision of ensuite and bathroom facilities.

The proposal seeks to reinstate the historic plan form where possible with particular focus on the front rooms and principal ground and first floors. This will result in an overall reductions of the hotel rooms from 47 to 42. Where intervention is required on the principal floors, bathroom 'pods' are provided which will be lower than the historic ceiling levels. These will allow the height and spatial quality of the historic rooms to be retained and appreciated. The pods will have paneled walls, with concealed jib doors, creating a simple, contemporary appearance. The pods will be set off the main walls, with a panel scribed around the existing skirtings to conceal the resulting gap.

In order to function as a modern hotel, arranged over 5 storeys, a lift is an operational requirement, and essential to the viability of a hotel in this central London location.



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The proposed lift will be located in the space to the rear of the main staircase in no.22. This area has been identified as the least impactful to the listed building allowing the lift to serve all floors. Minor harm has been identified to the no. 22 Bedford Place from this element of the scheme, through alteration to plan form and the loss of some historic fabric, as well as the functional loss of the rear windows in the part occupied by the new lift-shaft, although the appearance of functioning windows would be retained on the exterior of the building.

However, the heritage appraisal has demonstrated that the proposals will have no overall harmful impact upon the defined significance of the listed buildings, given the scale of alteration which they have sustained over 100 years of non-residential/hotel use. The buildings will remain in its long established hotel use and it is considered that an appropriate balance has been struck between the special interest of the listed buildings and their evolved internal character and layout. Opportunities have been taken to incorporate beneficial enhancements to the layout and spatial quality of the listed buildings and where possible, to reverse later, damaging alterations. The overrun will be contained within the building, meaning that the roof form of the listed building remains intact.

Externally the proposed extensions have been sympathetically conceived and will cause no harm to the appearance of the rear façade or the pattern of development along the terrace. The low-level extensions have been sufficiently setback so that they appear as fully subordinate and recessive. The new plant room at the rear will be contained within the existing topography of the site and beneath the rear terrace area. Significant enhancements will be secured through the replacement of the existing windows to the front and rear elevations to reflect the original, subdivided glazing pattern found elsewhere on the terrace.

## Amenity

The nearest residential properties lie directly opposite the site on the West side of the Bedford Place (nos.21-19). The immediate adjoining properties are in either commercial use (Russell Square) or use as hotels (adjoining terrace properties on Bedford Place and building on the opposite side of Montagu Street Gardens).

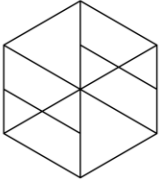
A new terrace area would be created at upper ground floor level. Given the use of the adjoining buildings the terrace would not have an adverse impact on the amenity of the occupiers in terms of overlooking.

There would be a negligible change from the proposal on neighbouring properties access to daylight and sunlight.

No windows would be installed in the side elevations of the extensions so there would be no direct overlooking into neighbouring windows or gardens.

## Noise

Policy A1 requires plant rating level should be designed to be 10dB below background noise levels (appendix 3). An acoustic assessment has been conducted by Clarke Saunders Acoustics for the installation of additional building services plant. The Clarke Saunders report concludes that, 'results of an environmental noise survey have established the current ambient and background noise climate, which has enabled acoustic criteria to be set for the control of plant noise emissions. Manufacturer's supplied data for the proposed building services plant have been used to predict the potential noise impact on the most affected receptors. Appropriate noise mitigation measures have been identified to demonstrate feasibility of the proposed scheme. Compliance with the noise emission design criterion has been demonstrated. No further mitigation measures are required.



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An outline assessment of external building fabric performance has also been undertaken to provide an indicative glazing performance for replacement windows, such that appropriate internal ambient noise levels within hotel guestrooms can be maintained. This is readily achievable by good quality single-glazed sash windows, with appropriate acoustically specified glass on facades exposed to elevated noise levels.

## Transport and Servicing

The site has a PTAL rating of 6b. The existing hotel is highly accessible and close to a number of tourist attractions. Numerous London Cycle hire docking stations are located nearby with the nearest less than 160m away on Great Russell Street.

No off-street parking is currently provided and none is proposed. Servicing and deliveries can also take place from the single yellow lines in front of the site and are not expected to increase significantly as a result of the increase in room numbers. A Servicing Management Plan is not considered necessary for this development.

A small servicing platform lift has been proposed within Building No. 21 front Lightwell. This will be used for refuse removal as well as kitchen and goods deliveries. The lift will be accessible from street level and Basement level. The hotel management will be responsible for collecting refuse and delivering the refuse and recycling to designated area in the Basement Level. A private collection company will be responsible for collecting the wheeled bins. Refuse collection will be undertaken within the loading zone along Bedford Place.

## Structure

A structural report has been prepared by DDA. The report finds that the grade II listed building will only be minimally affected by the proposed works. The load bearing structure is considered to be the perimeter walls, the party walls between the original properties and the stair walls. All other walls may be considered as infill. The floors are made up of timber beams and joists spanning between this load bearing structure.

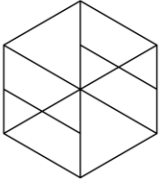
The main works are extensions to the existing rear extensions, the addition of a sunken plant area to the rear and the addition of a lift. All new structure is to be in keeping with the age and good heritage practice and in accordance with the Grade II listing and conservation area. Based on the above, it is considered that the structural impact of the proposed works is minimal and can be achieved to the heritage standards required.

## BIA review

Card Geotechnics Limited (CGL) has carried out a detailed Basement Impact Assessment (BIA) exercise providing information for stages 1 to 4 of the London Borough of Camden BIA process.

The proposed development comprises the excavation of the raised land areas down to a formation level of -0.48mACL (480mm below the existing corridor level) to construct two plant rooms at the rear of the existing lower ground floor that cover a total area of circa 55m<sup>2</sup> (47% of the existing rear garden area). The report finds the raised garden level is Made Ground.

CGL has carried out a screening process based on Camden's Planning Guidelines (CPG), Stage 1. The responses to the relevant questions confirms there is no requirement for further investigation and assessment. On the basis of the screening exercise conclusions the report finds that, no additional investigation and/or impact assessments are required for the site.



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## Energy

Energy and sustainable design are an integral part of the proposed redevelopment's design having specific regard to the grade II listed building. A detailed mechanical and ventilation strategy has been developed in conjunction with Meinhardt.

The renewable energy assessment shows that air source heat pumps (ASHP) are appropriate for the development. High efficiency Variable Refrigerant Volume/Flow (VRV/VRF) equipment will operate as the main communal heating (and cooling) system for the building.

The proposed redevelopment has been assessed in accordance with the cooling hierarchy detailed in policy S14 of the London Plan, in order to reduce overheating and minimise the use of air conditioning. It is proposed that VRF systems will be provided for cooling. These systems use highly efficient air source heat pumps and are expected to achieve a seasonal cooling efficiency of at least 5.36. Mechanical ventilation with high efficiency will provide fresh air and extract moisture/pollutants in accordance with Building Regulations Part F 2021.

Camden Council require a BREEAM assessment to be carried out on the proposed redevelopment. The assessment should demonstrate a rating of Excellent, unless it is demonstrated that it is not technically feasible or viable to do so, in which case proposals should demonstrate a high 'Excellent' rating.

A BREEAM pre-assessment has been carried out where an 'Excellent' rating of 74.07% has been shown to be achievable.

## Fire Safety

OFR Consultants have been appointed to provide fire engineering input and develop a Planning Fire Safety Strategy (PFSS) for the refurbishment works.

The (PFSS) evidences the provisions made for the safety of the users of the Bedford Place Hotel, as well as the provision of suitable access and provisions for firefighting in light of the London Plan's fire safety policy requirements and the rationale for these measures.

Of importance to note is the function of the proposed lift in the event of a fire, which again addresses issues of disabled access in an emergency.

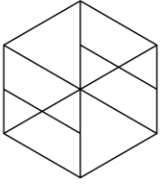
This document demonstrates that the Proposed Development addresses the fire safety provisions to meet the London Plan's policy D12(A) requirements.

## Conclusion

The existing hotel requires complete refurbishment, as its dated layout with separate bathrooms is simply not suitable for a modern hotel. This hotel has been bought and will be operated by a well established hotelier. The proposal will guarantee the long-term preservation of the hotel and promote tourism and visitors to central London including ensuring the hotel has improved accessibility for all to enjoy.

The application proposal seeks to upgrade and modernise the existing hotel so that it provides appropriate facilities and secures the optimum viable use of the listed building. Overall the proposals will not have a harmful impact on the heritage significance.

The scheme has been found to have no detrimental impact on neighbouring amenity in the form of noise or outlook.



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A screening opinion has been carried out to assess the need for a full BIA. The outcome of the report is that there is no requirement for further investigation and assessment.

Energy and sustainable design are an integral part of the proposed redevelopment's design having specific regard to the grade II listed building. A detailed mechanical and ventilation strategy has been developed as part of the scheme. The proposals will provide 9% improvement on the building's energy performance through the use of air source heat pumps.

A BREEAM pre-assessment has been carried out where an 'Excellent' rating has been shown to be achievable.

Finally, the scheme demonstrates that the proposal will address the fire safety provisions to meet the London Plan's policy D12(A) requirements.

We trust that the submission provides you with all the necessary information to validate this application. Should you have any queries in the meantime, please contact [info@theheritagepractice.com](mailto:info@theheritagepractice.com).

Yours faithfully,

The Heritage Practice