

**32 BEDFORD ROW,  
LONDON, WC1R 4HE**

**PLANNING STATEMENT**

**01 APRIL 2024**

# CONTENTS

1.0 EXECUTIVE SUMMARY .....	3
2.0 INTRODUCTION & BACKGROUND.....	4
3.0 APPLICATION SITE AND SURROUNDINGS .....	7
4.0 DEVELOPMENT PROPOSALS .....	10
5.0 PLANNING POLICY FRAMEWORK.....	12
6.0 PLANNING POLICY ASSESSMENT .....	15
7.0 CONCLUSIONS .....	32

# 1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the Application for Planning Permission and Listed Building Consent (“the Application”) submitted by 32 Bedford Row Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of no. 32 Bedford Row, London, WC1R 4BU (“the Site”), to provide a single family dwelling under Class C3 (“the Building”).
- 1.2 The Site is located within LBC, occupying a corner plot with Princeton Street to the south and Bedford Row to the east. The Building’s original use was as a residential dwelling but has been used exclusively as offices (currently Class E) since the mid to late 19<sup>th</sup> Century. It is currently occupied on a series of short-term licenses.
- 1.3 The subject Building is Grade II Listed and is also located within the Bloomsbury Conservation Area (**Section 3**).
- 1.4 The Proposals ensure that the Site is brought back into use, through the creation of a high-quality residential space. Returning the Building back into its original use through sensitive restoration would result in an enhancement to the significance of the listed building (**Section 6**).
- 1.5 Overall, the Proposed Development is in accordance with the national regional and local planning policy, including other material considerations such as emerging policy and guidance. The Proposals would provide a number of planning benefits over and above the existing situation (**Section 7**).

## 2.0 INTRODUCTION & BACKGROUND

- 2.1 This Planning Statement forms part of the Application for Planning Permission and Listed Building Consent (“the Application”) submitted by 32 Bedford Row Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of no. 32 Bedford Row London, WC1R 4BU (“the Site”), to provide a single family dwelling under Class C3 (“the Building”).

### **Planning Application**

- 2.2 This Planning Statement (“the / this Statement”) has been prepared in relation to the Application for Planning Permission and Listed Building Consent for no. 32 Bedford Row. Full details of the Proposed Development are set out in the Design and Access Statement that accompanies this Application, prepared by Thomas Croft Architects.

- 2.3 The description of developments for the Application seeking full Planning Permission is as follows:

*“Change of use from office (Class E) to residential (Class C3) to form a self-contained dwelling and internal and external alterations to the building including refurbishment, and alterations to the floor plan, new roof lantern, replacement fourth floor extension and roof terrace including glass balustrade.”*

- 2.4 The description of developments for the Application seeking Listed Building Consent is as follows:

*“Internal and external alterations to the building including, refurbishment, and alterations to the floor plan, new roof lantern, replacement fourth floor extension and roof terrace including glass balustrade.”*

### **Purpose and Format of the Planning Statement**

- 2.5 The purpose of this Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional, and local planning policy and other material considerations.
- 2.6 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the proposals.
- 2.7 The scope of supporting information has been established with regard to the national and local list requirements.

2.8 A Document Schedule has been prepared for the Application. Table 1.1 confirms the project team responsible for each matter:

**Table 1.1**

DOC REF	NAME OF DOCUMENT	AUTHOR
(1)	Schedule of Submitted Application Documents	Montagu Evans
(2)	Covering Letter	Montagu Evans
(3)	Application Form: Full Planning and Listed Building Consent	Montagu Evans
(4)	Community Infrastructure Levy	Montagu Evans
(5)	Drawing Schedule	Thomas Croft Architects
(6)	Site Location Plan	Thomas Croft Architects
(7)	Application Drawings	Thomas Croft Architects
(8)	Schedules (incl. fireplace, door, window)	Thomas Croft Architects
(9)	Design and Access Statement	Thomas Croft Architects
(10)	Planning Statement	Montagu Evans
(11)	Heritage Statement	Montagu Evans
(12)	Loss of Employment Statement (with Marketing Report)	Montagu Evans (with Farebrother)
(13)	Sustainability Statement	Ecolytik
(15)	Draft Construction / Demolition Management Plan	Paul Mew Associates
(16)	Photography Survey	Thomas Croft Architects
(17)	Schedule of Works	Thomas Croft Architects

2.9 This Planning Statement demonstrates that the overall Scheme would:

- Deliver sustainable development of a brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
- Ensure that the Site is brought back into its optimum use, through the creation of a high-quality residential dwelling which includes sensitive refurbishment of the Building and the provision of external amenity space in the form of a roof terrace and traditional roof lantern;
- Result in an enhancement to the significance of the listed building by returning the building to its original use;
- Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and

- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.

2.10 **Section 3** of this Statement provides background information on the Site including its planning history. **Section 4** sets out the Proposals for the Site. **Section 5** summarises the planning policy relevant to the Site. The Application proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

## 3.0 APPLICATION SITE AND SURROUNDINGS

### Application Site

- 3.1 The Site is located within the administrative boundary of LBC in the Bloomsbury area. It is situated within the southeast corner of the Borough, with the City of London just to the east and the City of Westminster to the south of the Site. The site area comprises approximately 380.5 sq m.
- 3.2 The Building, which forms part of a series of six Georgian terraced properties originally comprised of four storeys (G+3) and basement and attic levels with three bays and spans two rooms deep to the rear of the façade. The Site occupies a corner plot which adjoins 31 Bedford Row to the north, Princeton Street to the south and abuts Regent College London to the rear.
- 3.3 The existing lawful use of the entire site is Use Class E (Commercial, Business and Service) as it is currently used as offices. The site is configured as a series of small suites per floor that largely follows the original residential layout. However, the original use of the Site is as residential.
- 3.4 The Building is Grade II Listed (as of 1974) and is located within the Bloomsbury Conservation Area. A large percentage of buildings and spaces within this area are listed, including further terraced group listings on Bedford Row such as nos. 1-7 Bedford Row.

### Surrounding Area

- 3.5 The surrounding area is characterised by a mix of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location. The surrounding area is most renowned for its history of its strong literary and publishing connections, and more recently with law practices.
- 3.6 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. Russell Square, Queen Square Gardens, Brunswick Square Gardens and Coram's Fields among many more, are located within close proximity to the Site.
- 3.7 The architecture of the surrounding area largely comprises typical Georgian buildings with the exception of Millman Place; a post-war development which extends into Millman Street via a second-floor pedestrian bridge.

### Heritage

- 3.8 Historic England describes the Building as:

*"Yellow stock brick. Rusticated stucco ground floor, now painted. Stucco cornice and blocking course. 4 storeys and basements. 3 windows to Bedford Row and 3 windows (some blind) return to Princeton Street. Square-headed architraved doorways with fanlights and panelled doors."*

3.9 The Bloomsbury Conservation Area was designated in 1968 in order to protect Georgian and earlier development. The conservation area comprises an area of approx. 160 hectares from Euston Road to High Holborn, Lincoln's Inn Fields in the south, Tottenham Court Road in the west and King's Cross Road to the east.

3.10 The Site resides within the Great James Street/Bedford Row (Sub Area 10) as designated within the Bloomsbury Conservation Area Appraisal and Management Strategy. The Conservation Area Appraisal stipulates that:

*"Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street). Throughout the sub area, there is an increasing trend to return townhouses to their original use as single family dwellings."*

### **Accessibility**

3.11 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes. The closest tube stations are at Holborn and Chancery Lane which are approximately 0.3 miles from the Site.

3.12 The Site is highly accessible to London's bus network. The nearest bus stop is approximately 160 metres to the northeast of the Site on Theobolds Road, Red Lion Street (with numerous routes operating).

3.13 Being situated within north London, the Site is also located within close proximity to both London King's Cross and Euston, with all other national rail stations in London accessible via excellent underground links.

3.14 The Site does not incorporate any existing car parking or cycle parking spaces.



## Site and Planning History

- 3.15 No.32 Bedford Row was occupied as a residential townhouse since its construction in the mid 18<sup>th</sup> Century until the mid-19<sup>th</sup> Century when it was converted to offices.
- 3.16 A planning history search of LBC's planning register was undertaken, and the following applications within Table 1.2 are considered to be of relevance to the Proposals.

**Table 1.2**

Date	Address	Development Description	Reference number
Granted 31 <sup>st</sup> July 1959	32 Bedford Row	The carrying out of alterations including the formation of a new access at No. 32 Bedford Row	7823
Listed Consent 7 <sup>th</sup> December 1973	31-32 Bedford Row	Uniting of 31 and 32 Bedford Row, W.C.1 by the formation of a door opening through the party wall at ground level.	HB676
Listed Consent 3 <sup>rd</sup> July 1975	29, 30, 31 & 32 Bedford Row, London W.C.1.	Demolition of ground floor and basement rear extensions and building on to party wall at rear.	HB616
Granted 23 <sup>rd</sup> March 1975	31-32 Bedford Row	The formation of a door opening through the party wall between 31 and 32 Bedford Row.	HB734
Granted 9 <sup>th</sup> November 1977	2-10 Princeton Street & 29-32 Bedford Row	Erection of a building comprising basement, ground floor and five upper floors for use as offices and residential accommodation	24624
Listed Consent 9 <sup>th</sup> November 1977	32 Bedford Row	Internal alterations necessary to connect 32 Bedford Row, WC1 with the proposed adjoining premises.	HB1678
Listed Consent 3 <sup>rd</sup> August 1978	32 Bedford Row	Alterations including the formation of openings in the rear elevation at, basement, ground, first and second floor levels to link to the new development at 2-10 Princeton Street, WC1	HB1882
Listed Consent 29 <sup>th</sup> January 1979	32 Bedford Row	Alterations comprising the formation of a rear party wall opening and the erection of a partition and door at third floor level.	HB2054

# 4.0 DEVELOPMENT PROPOSALS

- 4.1 As set out in **Section 2** of this Statement, the Application seeks Planning Permission and Listed Building Consent for the internal refurbishment, external alteration and conversion of the existing listed building at 32 Bedford Row, back to single residential use.
- 4.2 The Proposal would involve:
- Change of use from commercial (Use Class E) to residential (Use Class (C3));
  - Removal of existing rooflight and replacement with traditional roof lantern;
  - Demolition and replacement of fourth floor extension as access to roof;
  - Proposed roof terrace, including the replacement of existing scaffolding railings with glass balustrade;
  - Internal refurbishment works associated with the conversion of the building to domestic accommodation.
- 4.3 Further details of the Proposed Development are set out within the existing and proposed drawings and Design and Access Statement prepared by Thomas Croft Architects which accompanies this submission.

## **Residential Town House**

- 4.4 The Proposed Development seeks to reinstate no. 32 Bedford Row as a self-contained residential townhouse. This involves the conversion of approximately 380.5 square metres from office use (Class E) to form a Class C3 dwelling, comprising a single-family home of approximately 390 square metres, with an enlarged fourth floor extension.
- 4.5 The dwelling would be arranged as a four-bedroom property, with kitchen and dining at ground floor and bedrooms/bathrooms and other ancillary spaces on the upper floors. The lower ground floor would provide a bedroom, gym and utility room, with plant and storage located within the pavement vaults.

## **Physical Alterations**

- 4.6 As set out above, the Proposals seek a number of internal and external alterations to the main dwelling. The Design and Access Statement includes a floor-by-floor scope of works.
- 4.7 At roof level, the Proposed Development incorporates a revised terrace arrangement which includes a glass balustrade set back from the edge of the roof. Sliding glass doors are proposed within the existing roof structure to provide access to the terrace, which would comprise an area of decking and access/storage area. The existing fourth floor structure would be removed and replaced with a larger extension, providing storage space and access to the roof.
- 4.8 Following the removal of the existing rooflight, the Scheme incorporates a traditionally detailed, octagonal, lantern.
- 4.9 The Applicant seeks to internally redecorate and refurbish the Building, whilst largely retaining the internal floorplan. Internally, at lower ground floor level the Proposed Development introduces a porch and utility area, whilst moving the W.C. At ground floor level, alterations to the layout include the creation of an entrance and stair hall.

- 4.10 At second floor level, the W.C is removed and replaced with a larger bathroom. At third floor level, an opening is removed to create bedrooms.

#### **Parking and Access**

- 4.11 The main access to the Site is via the front door on Bedford Row.
- 4.12 The Proposed Development is 'car free' and would not provide any on-site car parking. Presently, Bedford Row holds car parking spaces for residential permit holders and no additional car parking is being created via this Application.
- 4.13 Cycle parking is not currently provided in the existing buildings but will be provided as part of this Application. Cycle parking storage is positioned to the front of the property, within the vaults for ease of access.

# 5.0 PLANNING POLICY FRAMEWORK

- 5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and Section 6 provides an assessment of the Application against the policies and guidance contained within these documents.

## Statutory Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.
- 5.3 The Statutory Development Plan for the Site comprises the following:
- The London Plan (February 2021); and
  - The London Borough of Camden Local Plan (July 2017).
- 5.4 The applicable statutory provisions in the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act') are Section 16(2), Section 66(1) and Section 72(1).
- 5.5 The proposals involve direct works to a listed building and require Listed Building Consent. Section 16(2) applies to Listed Building Consents and states that:
- i. *"In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*
- 5.6 Section 66(1) applies to planning permissions, and states that:
- i. *"In considering whether to grant planning permission [F1or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*
- 5.7 Section 66(1) is relevant also because the proposals involve direct works to a listed building, as well as the potential setting impacts on listed buildings in the surrounding area.
- 5.8 Section 72(1) is relevant because the Site lies within the Bloomsbury Conservation Area. It states that:
- i. *"In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

5.9 The statutory provisions are supported by the policies at Chapter 16 of the National Planning Policy Framework (NPPF). The NPPF sets out general principles relating to the management of designated heritage assets at **Paragraph 205**, which outlines that:

- i. *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

5.10 Both statute and policy (see NPPF **paragraphs 205** and **206**) allow that a development may be consented for some other planning reason, on the balance of benefits. It is a matter of degree and relative weight on a case-by-case basis.

5.11 This framework for the assessment of effects on heritage assets is discussed fully in the Heritage Statement submitted with the Application.

### **Emerging Policy**

5.12 There is limited emerging policy in relation to the Site. The London Plan is up to date, but Camden is currently in the process of commencing a review of its Local Plan, with consultation being undertaken on the draft Local Plan until March 2024.

5.13 This is principally being undertaken to update policies to account for regional and national legislative and policy changes and the Council’s declaration of a climate and ecological emergency. It currently holds no weight in determination of this Application.

### **National Guidance**

5.14 The revised National Planning Policy Framework (the “NPPF”) was published in 2023 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government’s approach to planning matters and is a material consideration in the determination of planning Applications.

5.15 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

- a. *“For decision taking this means:*
  - i. *[...] approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 5.16 In November 2016 (updated February 2024), the Government Published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications.

### **Regional Guidance**

- 5.17 LBC has adopted a number of guidance documents (Camden Planning Guidance / “CPG”) which are material considerations in respect of the Application including:

- Access for All CPG (March 2019);
- Air Quality CPG (January 2021);
- Amenity CPG (January 2021);
- Basements CPG (January 2021);
- Biodiversity CPG (March 2018);
- Design CPG (January 2021);
- Developer Contribution CPG (March 2019);
- Employment Sites and Business Premises CPG (January 2021);
- Energy Efficiency and Adaptation CPG (January 2021);
- Housing CPG (January 2021); and
- Transport CPG (January 2021).

- 5.18 In addition to the above, the *Bloomsbury Conservation Area Appraisal Management Strategy* (April 2011) is a material consideration in the determination of this Application.

- 5.19 The remainder of this document identifies the key issues relevant to the determination of this Application and considers these in the context of relevant policy guidance.

- 5.20 The documents submitted as part of this Application also make reference to other technical guidance and legislation which is relevant to particular planning issues.

### **Site Specific Designations**

- Bloomsbury Conservation Area;
- Grade II Listed;
- Central London Area (i.e. Central Activities Zone);
- Greenwich Park Wolfe statue to St Paul’s Cathedral View and
- London Suburbs Archaeological Priority Area.

# 6.0 PLANNING POLICY ASSESSMENT

- 6.2 Within this section, we assess the component parts of the Proposed Development against the statutory development plan and other material considerations as outlined in **Section 5**.

## **Loss of Office Floorspace**

- 6.3 The lawful use of the Site is office use which falls under Class E of the Use Class Order Amendment 2020. The Proposals which seek to convert the Building from commercial to residential use, and as such, regard to the relevant policies within the Camden Local Plan and supporting guidance within the Employment Sites and Business Premises CPG (January 2021). Full consideration is set out within the supporting Loss of Employment Statement and Marketing Report, but summarised below.
- 6.4 Local Plan **Policy E2** (Employment premises and sites) states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.
- 6.5 **Policy E2** notes that Camden will resist development of business premises for non-business use unless it is demonstrated that the building is no longer suitable for its existing business use and the possibility of retaining, reusing or redevelopment the site for similar or alternative business has been fully explored over an appropriate period of time.
- 6.6 The Building was originally designed as a single-family dwelling house which follows a standard six floor arrangement with basement, ground and four upper floors totalling 380.5 square metres. The existing layout reflects the original use and is organised as a series of rooms off the central hallway and stairs.
- 6.7 The floor plates are small, and the layout of the floors is not conducive to collaborative modern working practices as the floors are split into various rooms, giving very little flexibility for open plan working.
- 6.8 It was last occupied by a single tenant in September 2015 who vacated and has since been offered to small businesses occupying on a room-by-room basis on short term licenses.
- 6.9 The physical plan form and constraints of the listed building would mean that it could not be upgraded to provide modern standards of office accommodation, viably or without detriment to the special interest of the listed building. Whilst the office serves a certain purpose, the building has a number of main constraints including:
- Outdated and poor services;
  - Poor energy efficiency;
  - No flexibility on the layout for tenants – due to listed status;
  - Not fully accessible;
  - Suffers from poor natural light to various parts;
  - Limited kitchen and WC facilities and
  - Lack of air conditioning and comfort cooling.

- 6.10 The 'Employment sites and business premises' CPG provides further guidance on assessing proposals that involve a loss of a business use and the factors it will take into account.
- 6.11 The existing Site comprises 10 'suites'. The property is currently occupied by six businesses, all of whom are lease expired and on monthly rolling lease agreements:
- Hereford Operations (Suites 1, 3 and 4) – occupied since April 2021 - law firm;
  - Akyel Immigration Law Practice (Suite 5) – since August 2018 – single practice law firm;
  - Corker Clifford (Suite 6) – since August 2019 – law firm;
  - Birchtree Law (Suite 7) – since December 2016 – law firm;
  - Twenty Six Entertainment (Suite 9) – since February 2022 – Gateshead based production company;
  - Llabrestabony Architects (Suite 10) – since March 2023 – architectural practice.
- 6.12 Suites 2 and 8 have been vacant since May 2022 and February 2023, respectively.
- 6.13 The Applicant has been marketing the property to find a viable tenant who would take the building on a long term lease, since February 2022.

*Suitability for Continued Business Use*

- 6.14 As indicated, the layout of the Building is not is not conducive to collaborative modern working practices as the floors are split into various smaller rooms which gives very little flexibility for open plan working.
- 6.15 Whilst the Building has been decorated and in generally good condition, in its current format, would fail to meet the requirements of modern operators.
- 6.16 The Marketing Report by Farebrothers indicates that a base level of specification requirement for offices includes;
- Fresh air supply;
  - Heating & cooling;
  - Robust, high-quality power;
  - Modern lighting;
  - Comms and data wiring capacity;
  - Sufficient WC provision;
  - Kitchen facilities;
  - Lift;
  - Statutory compliance, specifically DDA and
  - Sustainability features.
- 6.17 The existing Building fails to provide the base level of specification and noting the listed status, the Applicant is limited in the ability to alter the property to provide high quality office space.
- 6.18 The office accommodation would fall under second-hand Grade B classification, which constitutes poor quality space. With external steps into the Building and the cellular internal configuration, the property is not in accordance with



current accessibility requirements or guidance set out within the Equality Act 2010. Further, WC provision is a drawback which is not capable of satisfactory resolution.

- 6.19 In addition, there is no comfort cooling or air conditioning and there is a mix of old and new lighting and fittings with no provision for data cabling. All of these factors are exacerbated by age, physical layout and its curtilage listed status. Times have changed, as have modern working conditions and tenant requirements, which dramatically reduce the chances of continued business use into the future.
- 6.20 For the Applicant to provide the required modern amenities and infrastructure, net lettable space would need to be lost, which would result in the loss of rental income, whilst the Applicant would also be required to fund the alterations and improvements which would not therefore be financially viable.
- 6.21 Fundamentally, the listed status of the Building adds to the inflexibility of mitigating existing building issues and providing flexible working spaces.

#### *Marketing Evidence*

- 6.22 The property has been marketed for a long-term office occupier for over two years, since February 2022. Since that time tenants have been in occupation of parts of the building on short term licenses. For the most part, the tenants have been on flexible arrangements with short notice periods and low rental levels and have offered a meanwhile use, whilst the building has been marketed.
- 6.23 The process has been unsuccessful in finding a long-term tenant for the building. Over the course of the marketing period, which extends to over two years at the time of writing, there were only six enquires for the building, three of which resulted in inspections.
- 6.24 The feedback was that the property fell short of the standard that they required for their occupation with the specification, lack of amenity and small floorplates quoted as the reasons for the property being discounted.
- 6.25 A full summary of the marketing exercise undertaken during this period is set out within the accompanying Marketing Statement, prepared by Farebrother.

#### *The Office Market*

- 6.26 The LBC Employment Land Study (2014) sets out that there are a number of different markets that operate within the borough, the Central London, Camden Town and outer Camden office markets and each have distinctive sub-markets which attract different types of operators. The markets have developed due to differing occupier requirements for premises which shape the areas they choose to operate.
- 6.27 The Building does not meet the requirements of these three office markets. Whilst located close to Midtown, near to the Central London office market, its small size and poor quality means it is unlikely to attract corporate occupiers who are looking for high quality office space in Central London. Despite increases in rental levels in Midtown, corporate occupiers still wish to locate to central locations rather than relocating to cheaper accommodation in the north of the borough.

6.28 The Building suffers a poor office layout and lacks an open floorplan which is sought after by start-up and micro businesses. It is more likely that SMEs would find more suitable spaces in Camden Town or Kentish Town where there is a growing hub of business space.

6.29 A full review of office space on the market within LBC is contained within the enclosed Marketing Report.

#### *Alternative Use as Residential*

6.30 NPPF **Paragraph 127(a)** sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:

*“use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework”*

6.31 The principle of residential development in this location is set out in further detail below. Over the last 20 years, planning permission has been granted for the conversion of a large number of properties along Great James Street, Bedford Row, John Street and the wider Bloomsbury area, as these feature many similar period properties which are no longer suitable for modern office use. As tenants have the opportunity to review or end their leases, they are generally taking the opportunity, especially after the COVID pandemic to seek out accommodation that is better suited to their working practices and the modern working environment.

6.32 In considering developments affecting listed buildings, LBC must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

6.33 **Paragraph 196** of the NPPF sets out that in determining applications, the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

6.34 The Proposed Development will return the house to its original use as a single-family dwelling and will have no adverse effect on the identified significance of the building.

6.35 The Heritage Statement sets out that reinstatement would result in significant tangible as well as intuitive heritage benefits, resulting in substantial benefit to the architectural and historic interest of the Grade II listed buildings.

#### **Principle of Residential Development**

6.36 The Proposed Development accords with the aspirations of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.

- 6.37 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (**paragraph 60**).
- 6.38 **Paragraph 69** of the NPPF also requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (**paragraph 74**).
- 6.39 **Paragraph 70** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.40 London Plan **Policy H1** (Increasing Housing Supply) states that the Mayor carried out a London-wide Strategic Housing Market Assessment (SHMA) which identified a need for 66,000 additional homes per year in London. London Plan (Table 4.1) identifies the housing target over a 10 year period from the date of publication for LBC to be 10,380 new homes, which equates to 1,038 new homes per annum.
- 6.41 London Plan **Policy H2** (Small Sites) states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions. This will:
1. significantly increase the contribution of small sites to meeting London's housing needs;
  2. diversify the sources, locations, type and mix of housing supply;
  3. support small and medium-sized housebuilders;
  4. support those wishing to bring forward custom, self-build and community led housing; and
  5. achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- 6.42 Table 4.2 of the London Plan sets out a 10-year target of 3,280 for LBC, equating to 328 new homes within Camden on small sites per annum.
- 6.43 **Policy H1** states that self-contained housing is the **priority land use of the Local Plan**. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing.
- 6.44 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 6.45 As noted above, the principle of residential on this Site has already been established through its original use. The property was built as a residential dwelling and converted to offices in mid to late 19<sup>th</sup> Century. While the Building has now been in office use for over a century, the planning balance should recognise the heritage and housing benefits to be sought from converting it back into residential use.
- 6.46 The Proposed Development would result in the creation of a single additional residential dwelling, which forms a family dwelling on a 'small site'. Nevertheless, the provision of a townhouse on this Site fully accords with the aims of the

development plan and would contribute to LBC meeting its targets for housing delivery. The siting of residential development in this location, close to other residential uses should be supported.

### **Affordable Housing**

- 6.47 **Paragraph 64** of the NPPF requires planning policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.48 The provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas, as required by NPPF **paragraph 65**.
- 6.49 **Policy H4** in the London Plan emphasises that the strategic target for affordable homes is 50% within London with specific measures to achieve this aim outlined below:
- a. *“Requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach;*
  - b. *Using grant to increase affordable housing delivery beyond the level that would otherwise be provided;*
  - c. *All affordable housing providers deliver at least 50% affordable housing or 60% for strategic partners;*
  - d. *Public sector land delivering at least 50% affordable homes; and*
  - e. *Industrial land appropriate for residential use delivering at least 50% affordable housing if resulting in net loss of industrial capacity.”*
- 6.50 **Policy H4** expresses the need for affordable housing to be provided on site with affordable housing only provided off-site or as a cash in lieu contribution in exceptional circumstance.
- 6.51 Local Plan **Policy H4** (Maximising the supply of affordable housing) seeks to provide 5,300 additional affordable homes from 2016 to 2031 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional homes.
- 6.52 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:
- *“a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
  - *an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings; and*
  - *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*
- 6.53 The Proposed Development would provide a single residential unit within a listed building at 390 square metres (GIA), and therefore has a capacity for up to four homes based on the calculation set out in Local Plan **Policy H4**. A payment-in-lieu of affordable housing is therefore acceptable on this Site.

### *Payment in Lieu of Affordable Housing*

6.54 Paragraph 3.108 of the Camden Local Plan sets out that Camden will:

*“...take into account any constraints on capacity where existing buildings are converted (particularly listed buildings and other heritage assets)...”*

6.55 This position is also set out at paragraph 4.33 of Camden’s Planning Guidance on Housing (January 2021), albeit with a slightly different wording:

*“In assessing capacity, the Council will take into account any constraints that might prevent the additional area from contributing to the number of homes in the scheme (e.g. [...] does it involve conversion of a Listed Building that cannot appropriately be subdivided?).”*

6.56 In this case, the Proposed Development has a capacity of four units when considering the amount of floorspace in isolation. However, this is a Grade II listed building which is a considerable constraint that affects the site capacity for delivering homes via a conversion.

6.57 Returning the building to its original use as a single-family dwelling is considered a heritage benefit which would improve the legibility of the internal spaces of the building. Other heritage benefits include the replacement of the existing 1970s roof lantern with an appropriate octagonal structure which would better respond to the character of the house, and the re-instatement of historic chimneypieces where these have been lost.

6.58 Therefore, the site capacity for this Application is considered to be a maximum of two units and the calculation of the payment in lieu towards affordable housing should be undertaken on this basis, in accordance with the Camden Planning Guidance on Housing.

### **Housing Mix**

6.59 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students. **Paragraph 74** seeks to ensure that the size and location of homes will support a sustainable community and ensure that a variety of homes are provided.

6.60 London Plan **Policy H10** (Housing size mix) states that schemes should generally consist of a range of units and requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one- and two-bedroom units in freeing up family housing.

6.61 Local Plan **Policy H7** (Large and small homes) aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

6.62 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, **Policy H7** also states that LBC will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.

6.63 The Proposed Development would provide a generous single-family dwelling, with family accommodation being a high priority with Camden. Whilst the Site cannot provide a mix of units, it does meet the aims of **Policy H7** with regard to providing a high priority housing unit. The property is therefore appropriate, given the building's current form and layout.

### **Design Principles**

6.64 High quality and inclusive design are encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at **Paragraph 135**, that development:

- a. *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b. *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c. *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

6.65 London Plan **Policy D4** (Delivering Good Design) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Likewise, London Plan **Policy D5** (Inclusive Design) recognises the importance of developments achieving high standards of accessibility and inclusivity through design.

6.66 LBC's Local Plan **Policy D1** (Design) seeks to secure high quality design in development and requires development to:

- a. *"respects local context and character;*
- b. *preserves or enhances the historic environment and heritage assets...;*
- c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. *comprises details and materials that are of high quality and complement the local character;*
- f. *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*

- g. *is inclusive and accessible for all;*
- h. *promotes health;*
- i. *is secure and designed to minimise crime and antisocial behaviour;*
- j. *responds to natural features and preserves gardens and other open space;*<sup>20</sup>
- k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. *incorporates outdoor amenity space;*
- m. *preserves significant and protected views;*
- n. *for housing, provides a high standard of accommodation; and*
- o. *carefully integrates building services equipment.”*

- 6.67 LBC Local Plan **Policy C6** (Access for All) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.
- 6.68 Due to the historic nature of the property and its Grade II listed status, it is not possible to adhere to Building Regulations with regard to access, as step free access cannot be provided throughout the building.
- 6.69 At roof level, the Proposed Development removes the existing rooflight and replaces this with an octagonal lantern. The proposed lantern is of a traditional style which assimilate effectively within the character and appearance of the host property and surrounding conservation area.
- 6.70 With regard to the proposed roof terrace, this element of the Scheme incorporates a clear balustrade to surround this area. Glazed, sliding doors are proposed within the current roof structure to provide access to the terrace. The terrace, by virtue of its siting and sensitively designed glazed balustrade would have a acceptable impact on the character and appearance of the dwelling. Whilst the glass balustrade would present a modern feature, the scale and siting would ensure no harm would be raised to the Building or streetscene.
- 6.71 Following a review of the surrounding context, we understand that numerous roof terraces are in situ in the general vicinity of the Site and therefore the proposal would introduce a feature that would not appear out of character in respect of the surrounding area.
- 6.72 A Design and Access Statement, prepared by Thomas Croft Architects is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and how it responds to the context of the existing building and surrounding area.
- 6.73 In accordance with policy requirements the proposals provide a sensitive design with alterations to the building that are appropriate in the context of its historic character and interest.
- 6.74 The design has been heavily informed by heritage considerations and the retention and reinstatement of the Building's special character and interest which is aligned with the parameters of good design as defined at all policy levels.

## Heritage Considerations

- 6.75 The existing Building is Grade II Listed. The Site is also located within the Bloomsbury Conservation Area and owing to its central London location, the Site is within the proximity of a number of other listed buildings.
- 6.76 **Paragraph 200** of the NPPF states that:
- “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*
- 6.77 NPPF **Paragraph 205** notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.
- 6.78 Any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting should require, clear and convincing justification (**NPPF Paragraph 206**).
- 6.79 The Heritage Statement provides a full summary of the heritage policy and guidance.
- 6.80 London Plan **Policy HC1** (Heritage Conservation and Growth) states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.81 LBC Local Plan **Policy D2** (Heritage) outlines that the Council will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed building, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 6.82 In relation to designated heritage assets, **Policy D2** states:
- “The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a. *the nature of the heritage asset prevents all reasonable uses of the site;*
  - b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
  - c. *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
  - d. *the harm or loss is outweighed by the benefit of bringing the site back into use.*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm*



6.83 In relation to conservation areas, **Policy D2** sets out that LBC will:

- e. *“require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

6.84 In relation to listed buildings, **Policy D2** sets out that LBC will preserve and enhance these through:

- i. *“resist the total or substantial demolition of a listed building;*
- j. *resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. *resist development that would cause harm to significance of a listed building through an effect on its setting.”*

6.85 A Heritage Statement, prepared by Montagu Evans, accompanies this Application and should be read in conjunction with this Planning Statement, the proposed drawings and the Design and Access Statement prepared by Thomas Croft Architects.

6.86 The Proposed Development which seeks to return the main house to its original use as a single-family dwelling will have no adverse effects on the identified significance of the Building.

6.87 Taken as a whole, the complete package of works to be beneficial to the significance of the listed building, taking into account the benefits to be delivered by the scheme including the replacement of the unsympathetic, unattractive 1970s roof lantern with a more appropriate octagonal structure which responds to the character of the historic building, the removal of a modern partition wall obscuring an opening between, the front and rear rooms at ground floor level, the removal of unattractive service risers which are an intrusive feature in the hallway and at basement level and the reinstatement of appropriate chimneypieces at ground and first floor level where these have been lost.

6.88 The proposals therefore accord with the relevant national and local planning policies with regards to heritage and preserve the significance of the listed building and its contribution to the Conservation Area in line with the requirements set out at s16, s66 and s72 of the 1990 Act. We consider the statutory tests of these sections of the 1990 Act to be met.

#### **Residential Amenity**

6.89 London Plan **Policy D6** (Housing quality and standards) sets out that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

6.90 Local Plan **Policy A1** (Managing the Impact of Development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

6.91 **Policy A1** continues to state that LBC will:

- e. *“seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- f. *seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- g. *resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- h. *require mitigation measures where necessary.”*

*The factors we will consider include:*

- i. *“visual privacy, outlook;*
- j. *sunlight, daylight and overshadowing;*
- k. *artificial lighting levels;*
- l. *transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- m. *impacts of the construction phase, including the use of Construction Management Plans;*
- n. *noise and vibration levels;*
- o. *odour, fumes and dust;*
- p. *microclimate;*
- q. *contaminated land; and*
- r. *impact upon water and wastewater infrastructure.”*

6.92 To support the above policy, the GLA has produced Housing Standards Guidance LPG and LBC has produced extensive guidance within its Amenity CPG and Housing SPG.

#### *Impact on Amenity*

6.93 To the north, the Site adjoins 29-31 Bedford Row which is in use as Chambers. To the west, the Site adjoins Regent College London and several terraced, commercial properties reside opposite the Site at 14-15 Bedford Row. To the south, the Site resides opposite 33 Bedford Row which is in commercial use.

6.94 With regard to the provision of the roof terrace, the rear facing wall serving the college is built up to the shared building line with the Site, given its height and proximity, the rear elevation of the Regent College building would therefore restrict views from the terrace to the rear.

6.95 Regent College London benefits from an east facing dormer which is located adjacent to the Site and proposed terrace. The dormer serving Regent College London would be partially screened by chimneys. Noting that this neighbouring building is not in residential use, the Proposed Development would not result in any adverse impacts to residential amenity in terms of overlooking and subsequent loss of privacy.

- 6.96 No.33 Bedford Row benefits from several windows within the flank wall, opposite the Site. This neighbouring property is in commercial use and therefore the Proposed Development would not adversely impact residential amenity in terms of loss of privacy. The siting of the terrace in relation to this neighbouring property would result in restricted views to the windows within the flank elevation of No.33 Bedford Row.
- 6.97 Noting the separation distance between the Building and the properties opposite the Site on Bedford Row, coupled with their respective commercial uses, it is not considered that the proposed roof terrace would result in a detrimental loss or privacy to these neighbouring occupiers.
- 6.98 The Proposed Development would facilitate the creation of a single family dwellinghouse which would have less comings and goings than multiple businesses occupying different floors within the Site and as such the Scheme would result in an acceptable impact on the amenity of neighbouring occupiers in terms of noise and disturbance.
- 6.99 With regard to the proposed use as residential, the Proposed Development would facilitate the creation of a 4b8p dwellinghouse which would have a proposed GIA of 390 square metres. The dwelling would considerably exceed the prescribed space standards, with all habitable spaces provided with sufficient access to daylight, sunlight and outlook due to the dual aspect nature of the property.
- 6.100 The roof terrace would provide external amenity space which would measure 24.5m<sup>2</sup>. The London Plan Housing Design Standards LPG requires 5sqm + 1sqm of amenity space per bedspace, whereas the LBC Housing SPG requires 9sqm per resident.
- 6.101 The Proposed Development would meet the amenity space standards outlined within the London Plan Housing Design Standards LPG. The roof terrace provides the only opportunity for outdoor space on this listed building as it occupies the entire footprint of the site. As outlined above, the Proposed Development would considerably exceed the internal space standards, providing high quality residential accommodation. Noting the site constraints and the significant over provision in terms internal space, the shortfall in terms of the LBC Housing SPG amenity space requirements is not considered to degrade the quality of accommodation provided.
- 6.102 Therefore, we consider that the proposal would provide high quality residential accommodation for the benefit of future occupiers.

#### *Construction Management Plan*

- 6.103 The supporting text to Local Plan **Policy A1** (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).
- 6.104 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Paul Mew Associates.
- 6.105 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 6.106 We note that this draft Pro Forma could be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement. However,

construction impact matters are not likely to be severe and such obligation may not be required for this scale of development.

#### *Conclusion*

- 6.107 Overall, the Proposed Development has been designed to limit the impact on neighbouring amenity and ensures that future residents are afforded appropriate levels of amenity. The proposed alterations would preserve the amenity currently enjoyed by nearby residents and occupiers. The aim of the project is to ensure that potential impacts from noise and odour are limited during construction. Furthermore, mitigation and management procedures can be put in place during construction and operation of the Building to ensure health and well-being in the local area is maintained.

#### **Transport**

- 6.108 Section 9 of the NPPF sets out the Government's policies with regard to transport. **Paragraph 114** sets out that development should ensure that:

- a. *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b. *safe and suitable access to the site can be achieved for all users; and*
- c. *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

- 6.109 The chapter concludes at **Paragraph 117** that:

*"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."*

- 6.110 Chapter 10 of the London Plan provides the regional guidance for transport.

- 6.111 **Policy T1** (Strategic Approach to transport) outlines how development proposals should facilitate "the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041". Additionally all development should make the most effective use of land, reflecting it's connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure any impact is mitigated.

- 6.112 **Policy T2** (Healthy Streets) aims to improve London's health through delivering patterns of land use that facilitate residents making shorter and more regular trips by walking and cycling.

- 6.113 At the local level, **Local Plan Policy T1** (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.

### *Car Parking*

- 6.114 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.115 **London Plan Policy T6** (Parking) outlines that the Mayor wishes to see car parking restricted in line with the levels of public transport accessibility and connectivity with a greater emphasis on car-free development. Whilst car-free development has no general parking, disabled persons parking should still be provided.
- 6.116 **Local Plan Policy T2** (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.117 The Proposed Development does not provide any car parking spaces. As a result of its sustainable location and excellent accessibility to public transport and active travel modes, no additional car parking would be required. The development is therefore 'car free'. It is also appropriate in the context of its location, which is highly accessible and promotes the use of public transport, cycling and walking.

### *Cycle Parking*

- 6.118 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.119 London Plan **Policy T5** (cycling) outlines the Mayor's strategy to increase cycling within the capital. The policy outlines that development should contribute to the increase of cycling through the provision of cycle parking facilities and on site changing facilities. Furthermore, developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards.
- 6.120 **Policy T5** (cycling), table 10.2 outlines that for C3-C4 use class (all dwellings), long-stay cycle parking facilities would need to be provided within the development.
- 6.121 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:
- *provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and*
  - *makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.*

- 6.122 The Proposed Development provides the ability to store approximately three bicycles within the pavement vaults to the front of the Building. The existing building does not currently provide any dedicated cycle storage so this represents an improvement to cycle parking.

### **Sustainability**

- 6.123 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.
- 6.124 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The Proposed Development is a 'minor' scheme involving the conversion and refurbishment of a listed building to form a single residential unit.
- 6.125 London Plan **Policy SI 2** (Minimising Greenhouse Gas Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green and be seen' energy hierarchy. It seeks a 35% improvement in carbon reductions over 2013 Building Regulations for major developments with residential development advised to achieve 10%.
- 6.126 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including SI 4 (managing heat risk) and SI 7 (reducing waste and supporting the circular economy). Many of the GLA's policies are not suitable to be applied to minor developments.
- 6.127 At the local level, Camden Local Plan **Policy CC1** (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.128 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 6.129 Local Plan **Policy CC2** (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.
- 6.130 **Policy CC2** also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM domestic refurbishment. In this case, the Proposed Development does not meet this threshold.
- 6.131 This Planning Application includes an Energy & Sustainability Statement, prepared by Ecolytik, which sets out the energy efficiency measures to reduce the energy demand of the Proposed Development, alongside carbon reductions and water efficiency strategies which have been incorporated into the design.

- 6.132 The building is exempt from Building Regulations Part L requirements due to its listed status. However, the Proposed Development has been designed with the aim of reducing operational energy and associated carbon emissions, whilst the embodied carbon content of materials will be minimised as far as possible.
- 6.133 Through the measures outlined for each stage of the Energy Hierarchy, it is anticipated the Proposed Development could achieve a 43% reduction in regulated CO2 emissions over the existing building baseline.
- 6.134 The reductions have been maximised as far as possible given site and building specific constraints, which meets GLA and Camden's energy policies for minor change of use and extension developments.
- 6.135 Carbon offset payments are not deemed applicable for this minor change of use development.
- 6.136 The sustainability strategy for the proposal has been developed in accordance with relevant policies within the London Plan and Camden's Local Plan and are outlined within the Energy and Sustainability Statement.

### **Waste & Recycling**

- 6.137 Camden **Local Plan Policy CC5** (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.138 Waste storage and recycling bins will be provided on Site. Refuse will be periodically taken out by occupants from the Building to the kerbside on the relevant collection date.

### **S106 Heads of Terms**

- 6.139 As noted in **Paragraph 54** of the CPG, the Council may seek a contribution from developments, which result in the loss of more than 500 sqm GIA of employment floorspace, towards measures which create or promote opportunities for employment or training of local people.
- 6.140 The conversion of 32 Bedford Row results in the loss of 380.5 square metres (GIA) and therefore a planning obligation could not be sought in this instance.
- 6.141 Therefore, the Section 106 Heads of Terms for the Proposed Development are likely to be the affordable housing payment in lieu and the removal of parking permits for future occupiers of the building.

# 7.0 CONCLUSIONS

- 7.1 The Proposed Development to which this Statement relates, seeks the conversion and refurbishment of No. 32 Bedford Row as part of its change of use to a residential townhouse (Class C3) including associated alterations to the property.
- 7.2 The Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.3 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.4 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Deliver sustainable development of a brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
  - Ensure that the Site is brought back into its optimum use, through the creation of a high-quality residential dwelling which includes sensitive refurbishment of the Building and the provision of external amenity space in the form of a roof terrace and traditional roof lantern;
  - Accords with the development plan insofar that it provides housing, the priority land use in Camden;
  - Result in an enhancement to the significance of the listed building by returning the building to its original use;
  - Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and
  - Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.
- 7.5 We recognise that the Proposed Development would result in the loss of employment floorspace, part of which is currently occupied. However, the proposed conversion of the building to a single-family house represents a significant enhancement to its special architectural and historic interest, which is also being sensitively refurbished. In our view, the heritage and other planning outweighs the loss of employment use, in the overall planning balance.
- 7.6 In light of the above, we respectfully request that LBC grants planning permission and listed building consent for the Proposed Development.



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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.