

3 April 2024

Regeneration and Planning  
London Borough of Camden  
2nd Floor, 5 Pancras Square  
c/o Town Hall, Judd Street  
London  
WC1H 9JE

Dear Sir/Madam,

**APPLICATION FOR LISTED BUILDING CONSENT  
3-5 BEDFORD ROW AND 3-5 JOCKEY'S FIELDS**

On behalf of our client, Frogmore (FREP4 Bedford Row Limited), please find enclosed an application for Listed Building Consent which seeks:

*"The installation of a dry riser to the existing railing outside No.4 Bedford Row."*

Planning and Listed Building Consent was granted on 9 May 2023 (LPA ref. 2022/4518/P and 2022/4750/L) for the extension and alteration of 3-5 Bedford Row and 3-5 Jockey's Fields to create additional commercial space, reconstruction of the link structure and associated works. Subsequently, a minor material amendment (Section 73) and Listed Building Consent was submitted (LPA ref. 2023/3445/P and 2023/3447/L) for internal alterations and amendments to the elevations, roof and basement courtyard which are recommended approval subject to the signing of the Section 106 Agreement.

The current application seeks the installation of a dry riser to the existing railing outside No. 4 Bedford Row.

In addition to this covering letter covering heritage matters, completed application forms and certificates, this application for Listed Building Consent is accompanied by the following:

- Site Location Plan;
- Existing and proposed floorplan, elevations and section; and
- A Design Statement.

**1. Background**

Frogmore is the freehold owner of the building, having acquired the site in 2022. Planning permission and Listed Building Consent for the refurbishment and extension of 3-5 Bedford Row and 3-5 Jockey's Fields was granted in May 2023 (LPA ref. 2022/4518/P and 2022/4750/L). This consented for a dry riser to be located in the doorway of No. 5 Bedford Row. The minor material amendment (Section 73) and Listed Building Consent awaiting determination (LPA ref. 2023/3445/P and 2023/3447/L) show the dry riser relocated to the doorway of No. 4 Bedford Row.

Upon further investigation, following the progress of the detailed design and construction stage, it has been found that the doorway location is structurally unviable. This is explained in further detail in the submitted Design Statement.



The purpose of this application is to seek approval for a dry riser to be installed on the existing railing outside No. 4 Bedford Row which the London Fire Brigade (LFB) have approved.

## 2. Planning and Heritage Assessment

Paragraph 203 of the NPPF refers to the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation. London Plan Policy HC1(C) and Policy D2 of the Local Plan state that development proposals affecting heritage assets should be sympathetic to the assets' significance.

The Council previously concluded that the proposed development (being the wider refurbishment and extension of the Grade II listed building) would not harm the appearance and special interest of the area.

The fundamental objective of the development, as guided by the heritage policies of the NPPF, London Plan and Local Plan and in the context that policies for the CAZ also support and protect employment sites, is to bring the vacant heritage asset back into use as an office, to ensure that it is conserved, and its significance is preserved. To achieve a new letting/s, improvement to the quality of office accommodation is critical and therefore should hold great weight.

The originally submitted Heritage Appraisal concluded that the originally approved scheme would preserve and enhance, the special architectural and historic interest of the listed building for these reasons. The same conclusion applies to the character and appearance of the Bloomsbury Conservation Area and indeed, the setting of Greys Inn Garden. The high-quality design of the permitted scheme is also consistent with the more general design policies of the Development Plan.

Indeed, the officer's comments enclosed with the original planning decision notice concluded that:

*"Overall, the various alterations extensions will not harm the character or appearance of the host buildings, streetscene and conservation area. Special regard has been attached to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest and to the desirability of preserving or enhancing the character or appearance of the conservation area..."*

As discussed during pre-application discussions with the Council and as described in detail in the submitted Design Statement, the requirement for the dry riser to be relocated is as a result of detailed design progression and construction, and realisation that the previously approved location is not suitable.

Camden Council advised in their pre-application advice that every effort should be made to limit the visual impact of the dry riser on the visual quality and contribution made by No.4 to the quality of the streetscape.

The Applicant has carefully considered the design interventions to respect local context, and the appearance and character of the street's heritage assets in line with Policy D1 and D2.

A number of options were explored however only one was deemed compliant with LFB requirements. The only viable and complaint option is for an Exterior Surface Mounted Dry Riser to be located on the existing front railing of No.4 Bedford Row, which the LFB have approved.

The proposed dry riser has been carefully located away from the entrance of the street railings as far as possible. Whilst considering LFB requirements, painting the inlet and repainting the existing railings black and setting it back from the highway will ensure it is discreet, limiting its visibility to passers-by and will preserve on the special architectural and historic interest of the listed building and conservation area according with local and national design policies relating to heritage assets.

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### 3. Conclusions

This application for Listed Building Consent seeks approval for the installation of a dry riser which is required as part of the wider refurbishment of the building. Consideration to its location and design has been heritage-led and accords with the relevant policies and guidance.

We trust that the above is sufficiently clear to validate and determine this application, however, should you require any further require any further information, please do not hesitate to contact Nick Delaney or Nadia Shojaie of this firm.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Daniel Watney LLP

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