
14 Bedford Row, 12-13 and 14 Jockey's Fields, London, WC1R 4ED

Planning Statement





Contents

1.	Introduction	3
2.	Site and Surroundings	5
3.	Description of Proposal	8
4.	Planning Framework	11
5.	Pre-Application Engagement	12
6.	Key Planning Considerations	14
7.	Conclusion	31
8.	Appendix 1: Planning History	32



1. Introduction

1.1. This Planning Statement is submitted on behalf of True North Management ('the Applicant'), in support of a planning application and an application for listed building consent at 14 Bedford Row, 12-13 and 14 Jockey's Fields, London, WC1R 4ED ('the Site') for the:

Change of use from Office (Use Class E) to Apart-Hotel (Use Class C1), partial demolition of link structure, introduction of terrace, rooftop plant and other associated physical works.

1.2. The development proposals are referred to throughout this Statement as 'the Development' or 'the Proposed Development'.

1.3. The local planning authority ('LPA') is the London Borough of Camden ('LBC').

1.4. Following extensive pre-application discussions with LBC, this application seeks to retrofit the existing vacant and dilapidated office buildings into a high-quality apart-hotel. The proposed apart-hotel use will supplement London's Central Activities Zone, being located in proximity to many leading attractions and institutions.

1.5. This Statement will outline the Site's context, the Development Proposals and the planning policy context, before giving a detailed planning assessment. Consideration has been given to relevant development plan policies and other material considerations.

1.6. The remainder of this statement is set out as follows:

- Section 2 describes the Site and the surrounding area;
- Section 3 provides a description of the proposal;
- Section 4 outlines the pre-application process undertaken;
- Section 5 sets out the relevant planning policy framework;
- Section 6 assesses the scheme against the development plan.

1.7. The application is supported by the following plans and documents:

- This Planning Statement, prepared by Savills;
- Cover Letter, prepared by Savills;
- Marketing Evidence, prepared by CBRE;

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- Design and Access Statement, prepared by White Red Architects;
- Existing and Proposed Plans, prepared by White Red Architects;
- Site Location Plan, prepared by White Red Architects;
- Heritage Statement, prepared by Donald Insall Associates;
- Acoustic Report, prepared by Venta
- Air Quality Assessment, prepared by RWDI
- Construction Management Plan, prepared by Motion
- Energy Statement, prepared by EnergyLab
- Sustainability Statement (incl. BREEAM Pre-Assessment), prepared by EnergyLab
- Landscaping Scheme, prepared by White Red Architects
- Transport Assessment (incl. Travel Plan and Delivery and Servicing Management Plan), prepared by Motion
- Sustainable Drainage Systems (SuDS) Strategy, prepared by Elliot Wood
- Fire Safety Statement, prepared by Semper
- Statement of Community Involvement, prepared by Concilio.

2. Site and Surroundings

The Site

2.1. The Site comprises three buildings and a central link structure between them. These are 14 Bedford Row, 12-13 Jockey's Fields and 14 Jockey's Fields, London, NW1 0AG, in the London Borough of Camden, as shown in Figure 1. The Site has an area of 2,358.2 sqm (GIA), and the existing use is Use Class E. The location of the site and extent of its ownership boundary are illustrated in Figure 1.

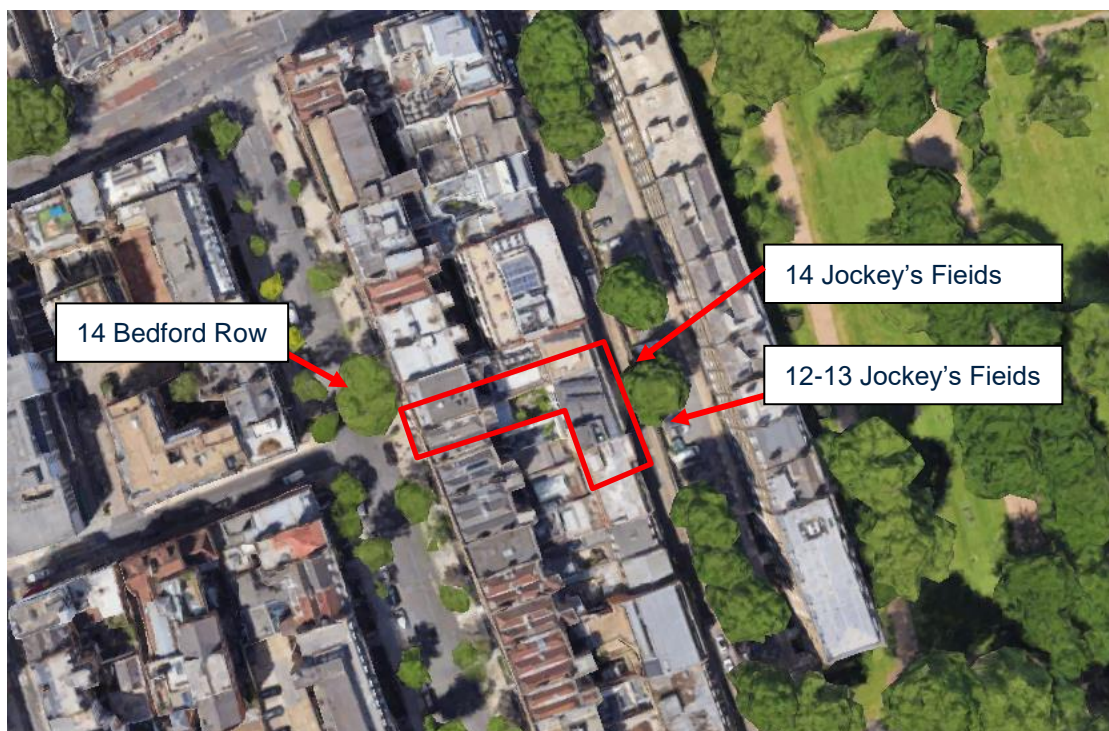


Figure 1 – Site Plan

14 Bedford Row

2.2. The existing office premises' primary frontage faces 14 Bedford Row, which is Grade II listed (List Entry Number: 1244599). 14 Bedford Row is arranged over lower ground, ground and four upper floors.

12-13 and 14 Jockey's Fields

2.3. 12-13 Jockey's Fields is arranged over ground to third floors. The ground floor comprises two garages which have been sold on a long leasehold basis to neighbouring occupiers. 14 Jockey's Fields is arranged over lower ground, ground and three upper floors and is connected to 14 Bedford Row via a central link structure.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 2.4. With the exception of the two garages on Jockey's Fields (sold on long leaseholds to neighbouring properties), the premises are currently vacant. The site was previously occupied by the Chartered Society of Physiotherapy, who have since relocated to smaller and more modern premises.
- 2.5. The most recent survey of 14 Bedford Row concluded the building as an Energy Performance Certificate (EPC) rating of D, as set out in the Easy EPC report dated September 2023, as found in the accompanying Sustainability Report, compiled by EnergyLab. The Government portal holds an EPC rating record for the building as a C, dated January 2023. For the purposes of this application, we refer to the rating for the building as D given this is the most recent assessment by a suitably qualified engineer.

The Surroundings

- 2.6. The Site is located centrally in Holborn, a short walk from Holborn Underground Station, serviced by the Central and Piccadilly Lines; and Chancery Lane Underground Station, serviced by the Central Line. National and international rail links are also within proximity to the Site at Euston and King's Cross St Pancras stations. As a result, the Site has a PTAL rating of 6(B), the highest possible score.
- 2.7. There are notable locations nearby, such as the British Museum, Covent Garden and Lincoln's Inn Fields. Many amenities are easily accessible on foot.
- 2.8. The area itself around Bedford Row and Jockey's Fields is mixed in character, accommodating both office and residential uses.

Planning Designations

- 2.9. The Site is located within London's Central Activity Zone (CAZ) and its Knowledge Quarter.
- 2.10. It is within the Bloomsbury Conservation Area and 14 Bedford Row (and attached railings) is a Grade II Listed Building (List Entry Number: 1244599). It is identified within Sub Area 10: Great James Street/Bedford Row of the Bloomsbury Conservation Area appraisal and management plan. There are a number of designated heritage assets adjacent to or opposite the site as shown in Figure 2. These are:
- 8-13 Bedford Row, which is Grade II* Listed Building (List Entry Number: 1244602);
 - 15-16 Bedford Row, which is a Grade II* Listed Building (List Entry Number: 1244605);
 - 17 Bedford Row, which is Grade II Listed Building (List Entry Number: 1244575);

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 29-32 Bedford Row, which is a Grade II Listed Building (List Entry Number: 1244577);
- 33-36 Bedford Row, which is a Grade II Listed Building (List Entry Number: 1244579); and
- Gray's Inn, which is a Grade II Listed Park and Garden (List Entry Number: 1000351)

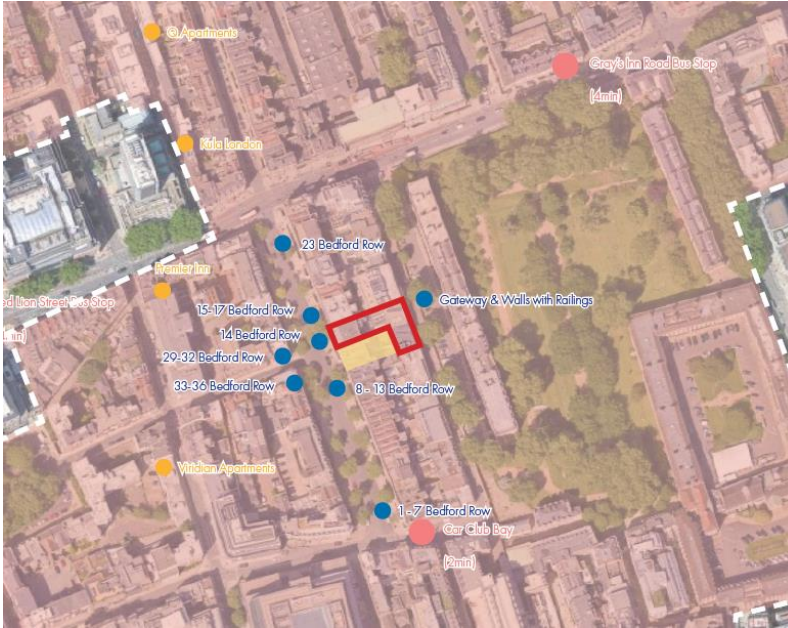


Figure 2 – Conservation Area (pink) and Listed Buildings (in blue).

2.11. The Site is within several areas designated in the London View Management Framework (LVMF), comprising:

- Blackheath Point to St Paul's Cathedral (Background Assessment Area (BAA))
- Primrose Hill summit to St Paul's Cathedral (Right Lateral Assessment Area (RLAA))
- Greenwich Park Wolfe Statue to St Paul's Cathedral (Viewing Corridor (VC))

2.12. The Site is located in an area of low probability of flooding (Flood Zone 1).

2.13. The Site is within an Archaeological Priority Area (2.11 London suburbs (Tier 2))

Planning History

2.14. A full table of the Site's planning history can be found in Appendix 1.

3. Description of Proposal

- 3.1. This section of the Planning Statement provides a description of the proposals subject to this planning application.
- 3.2. The Applicant's objective is to celebrate and respect the existing heritage asset of 14 Bedford Row by retrofitting the existing Site and delivering a high-quality, sustainable apart-hotel. Typically, the Site will be able to cater for those working in proximity to nearby legal sectors or visiting London's world-famous tourist destinations.
- 3.3. Associated physical works would be confined to the existing building envelope, with the asset reconfigured to accommodate its new use. The works will ensure that the heritage significance of the listed building at the Site remains unharmed and will open it up to visitors from across the world. The sensitive retrofit first approach will be a substantial benefit for the existing listed asset, by respecting and conserving its existing use.
- 3.4. To achieve this, this application seeks permission for the following development:

Change of use from Office (Use Class E) to Apart-Hotel (Use Class C1), partial demolition of link structure, introduction of terrace, rooftop plant and other associated physical works.

- 3.5. The existing development currently has a GIA of 2,358 sqm, which this application would decrease by 65 sqm to 2,293 sqm. A broad summary of works include:
- 65 rooms;
 - 1,191 sqm of proposed guest room NIA;
 - 57 sqm of proposed indoor amenity NIA;
 - 35 sqm of proposed outdoor amenity NIA;
 - reception space; and
 - refuse / ancillary / back of house space.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



14 Bedford Row

- 3.6. There are no changes proposed to the street-facing elevation at Bedford Row. The unattractive and dated interior layout would be altered to provide rooms with private facilities. Flues are to be removed from the top of the roof. A new door and window at the ground level of the rear elevation facilitate access onto the proposed terrace which sits on the roof of the link structure. This does not impact the external appearance of the listed asset.

12-13 and 14 Jockey's Fields

- 3.7. Physical alterations to the Jockey's Fields buildings would be limited. A new door is proposed along the existing third-floor terrace of 12-13 Jockey's Fields, with a set-back green buffer. A proposed fire door and louvred door at the south corner at ground level facilitate access to the new secure cycle storage. This will contain a minimum of 3 long-stay cycle spaces. High-level louvres on the ground floor are also proposed at 14 Jockey's Fields.
- 3.8. Two indicative plant locations on top of the roof are proposed, one on 12-13 Jockey's Fields and the other on 14 Jockey's Fields. These would be set back from the building edges to reduce visibility from the Jockey's Fields street level. By consolidating the plant space in these locations, the relationship of the Site with surrounding neighbours will be greatly improved. Acoustic plant screening is implemented to reduce noise pollution and helps to conceal unappealing visual elements.
- 3.9. Two new windows are proposed on the internal elevation of 12-13 Jockey's Fields. These will match the existing window lower down and use visually obscured glass on the lower panes to minimise privacy concerns.

Link Structure and Courtyard

- 3.10. A courtyard is proposed at the Lower Ground level through the partial removal of the northern part of the link structure. The courtyard will bring daylight into the proposed rooms at lower levels and will feature an internal planted garden.



- 3.11. A planted terrace will be created on the roof of the link structure by rationalising the existing plant structures into a single plant enclosure on the eastern part of the structure. Planters on this terrace are positioned to protect the privacy of neighbouring properties and create an improved space for both onlookers and guests. Together with the courtyard, this enhances green cover and biodiversity.
- 3.12. Further information can be found in the accompanying Design and Access Statement.

4. Planning Framework

- 4.1. This section of this Planning Statement sets out the relevant adopted and emerging national, regional and local planning policies pertinent to the Site and the Proposed Development.
- 4.2. In accordance with section 38(6) of The Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

Adopted Development Plan Documents

- 4.3. The development plan applicable to the proposed scheme is as follows:
- The London Plan (2021); and
 - Camden Local Plan (2017).
- 4.4. The National Planning Policy Framework (2023) is also a material consideration.
- 4.5. The following supplementary planning documents should be read in conjunction with and within the context of the relevant policies in Camden's Local Plan:
- Design Camden Planning Guidance (CPG) (2021);
 - Employment Sites and Business Premises CPG (2021); and
 - Developer Contribution CPG (2019).
- 4.6. The borough is also in the process of developing a draft new local plan. The first round of statutory consultation (under regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) was undertaken between 17 January and 13 March 2024. Due to the early stage of the draft plan, policies hold very limited weight at this time. This will increase as the draft plan progresses.

5. Pre-Application Engagement

- 5.1. The importance of pre-application engagement is set out in the National Planning Policy Framework ('NPPF') (2023) in which paragraph 39 states that "Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community". The NPPF emphasises that there is significant potential to improve the efficiency and effectiveness of the planning system for all parties through early engagement. The importance of pre-application engagement and frontloading is further highlighted in the accompanying Planning Practice Guidance ('PPG').
- 5.2. Camden's Statement of Community Involvement also notes the benefits of pre-application engagement as follows at paragraph 3.6: 'Pre-application discussions provide greater certainty and clarity to an applicant by identifying planning issues and requirements at an early stage'.
- 5.3. Two pre-application meetings, including further follow-up discussions, were held with LBC to discuss the Proposals. The first was held on-site with LBC on 18 January 2024, which focussed on the land use principles of the proposed apart-hotel use. The second pre-application meeting took place at White Red Architect's studio on 7 March 2024 and focussed on design. Cooperative discussions between Josh Lawler (Case Officer) and David McKinstry (Conservation Officer) regarding the proposal were ongoing throughout this process.

Change of Use from Office

- 5.4. During the pre-application period, the Applicant submitted extensive marketing evidence, compiled by CBRE, to justify the change of use in line with the policy tests of Local Plan Policy E2. This was considered by LBC, and the change of use from Class E (Office) use was consequently deemed acceptable in principle by LBC officers.

Principle of Apart-Hotel Use

- 5.5. During the first pre-application meeting, the Applicant also presented the introduction of an apart-hotel use at the Site. LBC noted that a C1 apart-hotel use would be entirely appropriate at the Site, given its proximity to other institutions and tourist destinations and its location within the Central Activities Zone.

Design and Heritage

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 5.6. During the second pre-application meeting, the Applicant presented a number of minor design interventions at the Site. These included the new consolidated rooftop plant enclosures on Jockey's Fields, the consolidation of plant and creation of a landscaped terrace on the roof of the link structure, the cleaning of facades, introduction of two new windows on the internal elevation of 12-13 Jockey's Fields and the partial demolition of the link structure to create a new landscaped courtyard at lower ground level. These were all accepted in principle and in design terms.
- 5.7. LBC's Conservation Officer also noted that the interior of all three buildings are without heritage significance. The officer considered that there is no heritage reason to resist the change of use and found the proposed limited external changes to be acceptable in principle and design terms.

6. Key Planning Considerations

6.1. This chapter of this Planning Statement assesses the proposed scheme against the identified policy framework for the Site, having regard to the material considerations. Consideration is given to the following key topics:

- the principle of the Proposed Development;
- design and heritage;
- sustainability;
- energy; and
- transport.

Principle of Development

6.2. National, regional and local policies all apply significant weight to the principle of optimising a highly sustainable brownfield location such as the Site.

6.3. At a national level, the NPPF encourages positive growth through the principles of sustainable development. It states that new development that optimises a site's potential is encouraged through making the best use of brownfield land in sustainable locations. Paragraph 86 of the NPPF notes that planning decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Paragraph 120(d) of the NPPF states that "planning policies and decisions should promote and support the development of under-utilised land and buildings.

6.4. At a regional level, Policy GG2 of the London Plan (2021) seeks to create successful sustainable mixed-use places that make the best use of land.

6.5. At a local level, Policy G1 of the Camden Local Plan outlines the borough's intention to deliver growth by securing high quality development and promoting efficient use of land and buildings.

Change of Use from Office

- 6.6. The Proposals seek to change the use of the Site from its existing Office (Class E) use.
- 6.7. The premises are no longer suitable for continued business use. The previous tenants, the Chartered Society for Physiotherapy, relocated from the Site due to its poor accessibility and inability to meet contemporary collaborative and flexible working requirements. Market commentary can be found under separate cover, produced by CBRE, demonstrating how fundamental shifts in the demand for office space (including, but not exclusive to, the need for collaborative space, fully accessible end-of-journey facilities and high sustainability credentials) have resulted in a 'flight to quality' in the occupier market which has meant that sites such as 14 Bedford Row often attract minimal to no demand from potential tenants.
- 6.8. The Site has been unable to attract any prospective office tenant, despite a rigorous marketing period of the Site having been undertaken since September 2021. Any interest in the Site was invited – including offers for smaller elements of the Site and offers on a 'cost mitigation' basis.
- 6.9. These fundamental changes within the occupier market, increasing vacancy rates of office space within this area and the awkward configuration of the buildings demonstrate why the Site is not suitable for continued Office use. This section of this Planning Statement demonstrates why the evidence robustly supports this conclusion and justifies the policy tests of Camden Local Plan Policy E2 and supporting CPG advice.
- 6.10. Policy E2 (Employment premises and sites) states that LBC will encourage the provision of employment premises and sites in the borough and it will protect premises or sites that are suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the development of business premises where: (A) it is demonstrated that the site or building is no longer suitable for its existing business use; and (B) that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time. Each of these policy tests is considered in turn below.

A) The site or building is no longer suitable for its existing business use

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.11. In regard to part A, the site is currently in poor condition and is unable to meet modern commercial specifications, as working practices and occupier expectations have undergone a fast and significant period of change, catalysed by the COVID-19 pandemic, increasing ESG agendas and changing working-from-home habits.
- 6.12. Moreover, the attached marketing evidence, supplied by CBRE, outlines how the Site does not meet market occupier requirements for office space, which calls for highly sustainable buildings with ample indoor and outdoor breakout and amenity space that can help businesses attract workers back into the office.
- 6.13. The arrival experience of the Site is poor, and the physical plan form and listed status of 14 Bedford Row mean that the building is not accessible for all. The property has compromised floor-to-ceiling heights and cellular/compartmentalised layouts over various split levels. The Site also suffers from poor natural light and ventilation, inefficient plan form for office layout, outdated services, poor energy efficiency, not enough kitchenettes or WCs, and a lack of flexibility with the floor layouts. The premises are also of poor sustainability credentials, with a current EPC rating of D. The minimum EPC requirements for commercial buildings will be increasing to B in 2027, and the costs required to refurbish the building in its current use to meet that requirement are prohibitive.
- 6.14. All of these aforementioned characteristics leave the Site undesirable for a modern office occupier, as demonstrated by the 2+ years of marketing evidence provided by CBRE.
- 6.15. A significant and prohibitive amount of refurbishment and intervention would be required to bring the office space up to current office market expectations, and even in doing so, there would be little guarantee of occupier take-up considering the onerous requirements for new business space by modern tenants.
- 6.16. Further to the first test of Policy E2, LBC provides supplementary guidance within its Employment Site and Business Premises CPG for Proposals involving the loss of business premises and sites. Paragraph 7 notes that 'when assessing proposals that involve the loss of a business use the Council will consider whether there is potential for that use to continue'. The guidance document then goes on to outline what factors the Council will take into account when considering the loss of business floorspace.
- 6.17. We have set out below each factor considered within paragraph 7 and how our proposal accords with them:

Whether the premises are in a reasonable condition to allow the use to continue

6.18. CBRE, the sales and leasing agent instructed to market the Site, has confirmed that the current configuration and fit-out are not conducive to modern-day office occupiers for the reasons set out in paragraph 6.12 of its Marketing Report.

The range of unit sizes it provides, particularly suitability for small businesses.

6.19. CBRE's Marketing Report and engagement with prospective tenants, as demonstrated within the submitted enquiry schedule appended to the report, highlight why the Site was not deemed suitable for occupation by small businesses.

The suitability of the location for any business use;

6.20. CBRE's report and engagement with prospective tenants (see the enquiry schedule submitted under separate cover) highlight that the Site's location was a key factor in the discounting of the property for many of the enquiring parties. In the last 3 years, there has been a significant increase in available space returning to the market in this area, often in a poor state / second-hand condition.

How the business use is related to other neighbouring/nearby land uses

6.21. The neighbouring land uses are of mixed nature. The site neighbours residential use at 12 and 13 Bedford Row, with office uses at 11 and 15 Jockey's Fields and 15 Bedford Row. There is no existing relationship between the Site and its neighbours that a change of use away from office would hamper.

Whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space

6.22. A lower quantum of employment space is not viable based on the CBRE marketing evidence for the Site, which invited any leasing offers over the 2+ year marketing period. No offers were received for any part of the buildings which demonstrates that the buildings are not suitable to be used for a lower quantum of employment space.

B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.23. Part B of Policy E2 requires Applicants to demonstrate whether there is potential for continued business use, evidence of thorough marketing over a period of at least two years.
- 6.24. The premises have been marketed by a reputable agent (CBRE) via a range of platforms, including a visible letting board (since July 2021) and on the online industry-wide Agents Society platform (since September 2021). All marketing particulars state the existing lawful use as an office building.
- 6.25. CBRE advertised "For Sale and to let – all enquires", inviting offers from all interested parties, but none submitted a formal offer, primarily because the quantum of space required was not available across a single unbroken floorplate, and equally due to the property's inability to cater for high-quality smaller demises.
- 6.26. The consequence of this open-ended marketing approach resulted in 105 entries of enquiries, 17 of which were for smaller spaces (many in the region of 8,000-10,000 sqft, and as small as 2,000 sqft). The reasons that these interested parties did not proceed with the space are set out below:
- unfavourable arrival experience;
 - focus on better quality opportunities;
 - 5,000 to 15,000 sqft of space over a single floor required;
 - too much work to make into serviced offices;
 - self-contained space required, and business is too small for whole area;
 - location not practical;
 - preference for Farringdon due to Crossrail;
 - no appetite for CAPEX works;
 - more creative space desired; and
 - location is too quiet.
- 6.27. The CBRE interest schedule confirms the number of enquiries received and the reasons why the building was not successfully leased/sold. The sale interest schedule demonstrates that alternative business uses have been discounted by respondents, including for serviced office providers. Refurbishment and redevelopment have also been discounted by respondents, as set out in the sales interest schedule.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.28. As demonstrated in the accompanying Marketing Evidence from CBRE, the site has been actively marketed for lease since September 2021. This represents a period of well over 24 months.
- 6.29. The marketing exercise has not attracted offers from prospective tenants, with respondents citing issues such as the poor quality of the existing office premises, poor arrival experience, compromised floor-to-ceiling heights on upper floors and cellular/compartmentalised layouts over various split levels.
- 6.30. The Employment Sites & Business Premises CPG sets out criteria for marketing evidence at paragraph 44. These criteria are considered below:

Employment Sites & Business Premises Planning Guidance	Evidence
Use of a reputable local or national agent with a track record of letting employment space in the borough	The nationally reputable agent CBRE undertook the marketing exercise.
A visible letting board on the property (constant throughout the marketing period)	A visible sale/letting board has been visible at the front of the site since 30/07/2021.
Existing lawful use of the advertised premises should be included in the marketing materials	As shown in the leasing leaflet and marketing brochure in the appendix, the site was advertised as an existing office.
Continuous marketing over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed) to the date of the submission of the planning application	The property has been continuously marketed since September 2021.
Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property	CBRE leasing approach was entirely open minded with regards to lease terms and rental level. The driver was a cost mitigation exercise, with the objective of having the overheads covered by an occupier. The property was discounted before viewing on all occasions due to its configuration and secondary specifications.
Lease terms should be attractive to the market: be for at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake	The marketing material clearly demonstrates that any leasing offers was invited, even for nil rent arrangements. This is the most attractive offer to the



<p>some works and/or include short term flexible leases for smaller premises which are appropriate for SMEs; appropriate rent-free periods should be offered to cover necessary fit out or refurbishment costs.</p>	<p>market.</p>
<p>A commentary on the number and details of enquiries received, such as the number of viewings and the advertised rent at the time, including any details of why the interest was not pursued; and</p>	<p>As shown in the leasing and sales interest schedule in the appendix, a commentary has been provided on the number and details of enquiries received. Reasons for why the interest was not pursued: Too cellular Size, self-contained Too many floors Location Condition</p>
<p>Where there is an existing employment use then we will require evidence that the tenant intends to move out</p>	<p>See hyperlink: (“https://www.csp.org.uk/news/2020-11-19-csp-seeks-new-london-premises”)</p>

Table 2: Camden CPG criteria for the marketing assessment of the commercial premises.

6.31. Thereby, the tests of Part B of Policy E2 are considered to have been met in full.

6.32. We note that LBC has recently (on 13 March 2024) concluded its public consultation on the regulation 18 version of its draft local plan. Whilst the draft plan is still at the regulation 18 stage and holds little weight at present, the recently drafted evidence base, which underpins the emerging policy, outlines the changing market trends for office space within the ‘Employment Land Review’ Report, authored by AECOM in December 2023. Paragraph 1.6.3 of the report notes that Borough-wide vacancy rates increased from 4% in 2014 to 8.1% in 2023. Notably, availability and vacancy rates for offices were at their highest (and net absorption rates at their lowest) within the 2,000-10,000 sqm range for 2023. This is important considering this is the range that Bedford Row falls within. This evidence demonstrates that there has been a major decline in the demand for office space in this area, which is material to whether the Site by reason of its locality is suitable for continued office use.

6.33. We set out below how the proposed development also satisfies the requirements of the proposed new policy IE2, which is intended to replace current policy E2.

Part C of draft Policy IE2 states, “the loss of offices in the borough will only be considered acceptable where:

i. A comprehensive marketing campaign has been undertaken for at least 12 months which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the following:

a. Refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;

b. Discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements;

c. The feasibility of reconfiguring the premises to meet the demands of smaller businesses, including studios, start-ups and micro businesses.

ii. Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to demonstrate it is not possible for refurbishment works to be undertaken."

6.34. Taking each point of IE2 in turn:

Part I - 14 Bedford Row has been marketed for over 24 months, more than double the emerging policy requirement, using a wide range of marketing strategies to ensure the potential occupiers are aware of the property's availability. The property was listed on CBRE's office listing website and also marketed on the website 'Agents Society'.

Part I (a) - significant investment would be required for the refurbishment and modernisation of the building to enhance its attractiveness to potential occupiers. Even if this refurbishment was undertaken, there would be no guarantee of a lease being agreed upon. CBRE's marketing report and engagement with prospective tenants highlight that it was not just the Site's condition that did not lead to its leasing or a sale to an office occupier or owner, but that the Site's location was also a key factor in the discounting of the property for many of the enquiring parties.

Part I (b) - the property was marketed on a 'cost mitigation' basis (as advertised), inviting rental offers to cover the running costs of the premises. CBRE invited offers from all interest parties, however, they did not submit a formal offer primarily due to the property's inability to cater for high-quality smaller demises (see enquiry schedule).

Part I (c) - leasing a lower quantum of employment space was ultimately not achieved despite over 24 months of marketing CBRE inviting offers on the property not based on marketing evidence provided and therefore would not be delivered on a speculative basis as part of wider redevelopment proposals.

6.35. In summary, the premises have been marketed over a period of 2 years. There has been no interest in the leasing terms offered. In addition, the site has been put up for sale as an office and there have been no viable offers for the continuation of its existing use. Given the above evidence, it is considered that the Site is no longer suitable for continued office use, as evidenced by the extensive marketing period.

6.36. As such, we conclude that tests of policy E2 and accompanying guidance have been met and the change of use would be acceptable. Retrofit (as proposed by the Applicant) is supported by policy. Alternative land uses, such as that proposed by the Applicant, will allow for the enhancement and safeguarding of this vacant heritage asset situated on highly accessible brownfield land.

Apart-Hotels

6.37. London Plan Policy SD4 E states the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced. It asserts that they are a defining feature of the vibrant and distinctive character of the CAZ. London Plan policy E10 recognises the importance of tourism to London's economy and states London needs to ensure that it is able to meet the accommodation demand of tourists who want to visit the capital. The London Plan seeks delivery of 58,000 visitor bedrooms across London by 2041 of which the GLA projects that 1,595 net rooms are required in Camden.

6.38. Camden Local Plan Policy E3 recognises the importance of the visitor economy and directs visitor accommodation development to accessible locations in the Central London Area, particularly by public transport. The policy requirements are discussed below.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.39. Large-scale tourism development and visitor accommodation should be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn. The site is located in Central London, specifically Holborn.
- 6.40. Visitor accommodation should be easily reached by public transport. The site is in a highly sustainable location with a PTAL of 6b (the best possible), within walking distance to several London Underground and Rail stations.
- 6.41. The development must provide any necessary pick up and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary. The proximity to several London Underground stations will minimise the need for vehicular travel.
- 6.42. Development should not lead to the loss of permanent residential accommodation and not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems. The surrounding area is mixed use, with residential and office uses adjacent to each other. The apart-hotel use would not impact the balance and mix of uses in the area.
- 6.43. Finally, the proposal will not result in the loss of permanent residential accommodation. Taken together, it is considered that the proposed visitor accommodation use is appropriate for this location and that the development promotes the growth of London's economy and CAZ functions.

Local Plan Policy H2

- 6.44. Camden Plan Policy H2 applies to all developments proposing a significant increase in floorspace, including non-residential uses. The policy seeks 50% of all additional floorspace to be self-contained housing, subject to certain considerations. The threshold for the policy in the Central London Area is 200sqm of additional floorspace. This scheme consists only of a change of use, a small amount of demolition and internal alterations. It does not comprise any uplift in floorspace. Therefore, Policy H2 is not applicable.

Design and Heritage

- 6.45. Policy D3 of the London Plan states developments should respond to the existing character of a place and should be of high quality. This should be done by identifying the special and valued features and characteristics unique to the locality and by respecting, enhancing and utilising heritage assets and architectural features.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.46. Policy D1 (Design) of the Camden Local Plan outlines LBC's expectations for achieving high-quality design. Policy D2 of the Local Plan states that "The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings". It will require that development within conservation areas preserve or, where possible, enhance the character or appearance of the area. It will seek the preservation or enhancement of listed buildings and resist change of use, alteration or extensions that would harm its special architectural and historic interest.
- 6.47. The need for high-quality design in development, which respects local context and character, is echoed in the Bloomsbury Conservation Area Appraisal and Management Strategy (2011). The strategy dictates that alterations to buildings in this area must complement one another as they contribute as part of a group to the overall character of the conservation area.
- 6.48. Policy D2 requires development within conservation areas to preserve or, where possible, enhance the character of the area. The policy also resists "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 any development that would cause harm to significance through an effect on their setting.
- 6.49. 14 Bedford Row was originally built in 1717-1718 and was subsequently heavily altered by the Victorians. It was demolished in 1967 after war damage and then rebuilt as modern office accommodation with a Georgian-style facade in the same year. The building was Grade II listed in 1974, being described on the register as "rebuilt in facsimile after wartime bombing". The interiors are entirely modern and are of no significance. Historic England's listing entry notes that it was included for group value as part of the terrace on the east side of Bedford Row.
- 6.50. The primary significance of the heritage asset is in its front elevation. This includes the windows, front door and porch design. The elevation is significant in its group value on 14 Bedford Row. The Bloomsbury Conservation Area Appraisal lists 14 Bedford Row as a positive contributor.
- 6.51. By contrast, 12-13 and 14 Jockey's Fields are unlisted and described in the conservation area appraisal as "of lesser quality and a larger scale, out of keeping with the mews". 12-13 Jockey's Fields was built in 1969 in a modernist interpretation of a mews building designed as offices. It is considered to make a neutral contribution to the conservation area and the rear elevation could be said to detract from the significance of the conservation area.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.52. The only physical change to the exterior of 14 Bedford Row is the removal of modern flues from the top of the roof. These are not visible from street level. There are no changes proposed to the street-facing elevation at Bedford Row. A new door and window at the ground level of the rear elevation facilitate access into the proposed terrace on the roof of the link structure. This does not impact the external appearance of the listed asset.
- 6.53. The property will be sensitively restored to a specification befitting of 14 Bedford Row's listing as a designated asset. The unattractive and dated interior layout would be altered to provide smaller guest rooms with private facilities. As informed by heritage consultant Donald Insall Associates, the proposed scheme will be designed to preserve and enhance the heritage significance of the listed building and the character of the Bloomsbury Conservation Area. As physical works would be primarily confined to the existing building envelope, the proposed change of use would not harm the historic interest of the existing building along Bedford Row.
- 6.54. A new door is proposed to the existing third-floor terrace of 12-13 Jockey's Fields, with a set-back green buffer to screen the terrace. There is an existing door, and the proposed door would be of a similar style.
- 6.55. A proposed fire door and louvred door at the south corner at ground level facilitate access to the new secure cycle storage. This would replace two existing doors. High-level louvres at the ground floor are also proposed at 14 Jockey's Fields. Two indicative plant locations on top of the roof are proposed, one on 12-13 Jockey's Fields and the other on 14 Jockey's Fields. They are set back to reduce visibility from street level. Acoustic plant screening is implemented to reduce noise pollution and helps to conceal unappealing visual elements.
- 6.56. The external changes to the Jockey's Fields buildings have been designed not to cause harm and to provide moderate benefit to the character and appearance of the Bloomsbury Conservation Area. The setting of nearby listed buildings will not be harmed.
- 6.57. In summary, the proposals are important to allow a vacant Listed building to be brought back into use, and to ensure its long-term conservation, use and enjoyment by visitors seeking high-quality accommodation. The scheme sustains the special architectural and historic interest of the listed building and character and appearance of the conservation area in accordance with policy. It is therefore considered that the proposed development would not cause heritage harm and is in keeping with the context and character of the area.

Sustainability

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



- 6.58. Camden's Local Plan Policy CC1 sets out the requirements for climate change mitigation, stating that 'the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation'. Moreover, London Plan Policy SI2 seeks to minimise embodied carbon emissions. This is set out in the 'Be Lean, Be Clean, Be Green' approach.
- 6.59. Local Plan Policy CC2 requires development to be resilient to climate change. Measures include the protection of green spaces and promoting new appropriate green infrastructure, reducing overheating, and encouraging conversions of residential floorspace to achieve an "excellent" BREEAM score.
- 6.60. The Development will target an on-site minimum 35% reduction in regulated carbon emissions against the Building Regulations Approved Document Part L 2021 levels as per Camden's requirements. Facade improvement, highly efficient systems and renewable technologies such as air source heat pumps and PV solar panels are proposed.
- 6.61. The design team is also committed to achieving lower water usage targets (105 litres/person/day) and the sustainable use of materials.
- 6.62. Wellbeing, including natural ventilation strategies, will be considered where possible. Mechanical ventilation with heat recovery (MVHR) systems shall be implemented within the rooms to ensure sufficient ventilation levels are provided at all times, mitigating any potential overheating risks and minimising heating requirements in summer months.
- 6.63. The attached Sustainability and BREEAM assessment also outlines how the Proposal is able to achieve a BREEAM Excellent score, in compliance with Policy CC2.

Energy

- 6.64. Local Plan Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards, including supporting and encouraging sensitive energy efficiency improvements to existing buildings. London Plan Policy SI 2 sets out the approach for reducing greenhouse gas emissions and minimising energy demand, requiring a detailed energy strategy and minimum on-site reduction of at least 35% beyond Building Regulations. Furthermore, London Plan Policy SI 4 states that development proposals should minimise adverse impacts on the urban heat island.
- 6.65. The Minimum Energy Efficiency Standards (MEES) were adopted in 2018 and require all buildings to have a minimum EPC rating of C by 2027 and B by 2030. 14 Bedford Row currently has an EPC rating of D. The poor environmental performance contributes to the non-viability of the property. The site is in need of a major upgrade. The proposals will achieve a major upgrade of the building's thermal performance and sustainability metrics to minimise operational carbon.
- 6.66. The energy strategy for the Site has been developed following the "Be Lean, Be Clean, Be Green and Be Seen" energy hierarchy set out in London Plan Policy SI 2. The measures introduced are summarised below.
- 6.67. **Be Lean:** Improvements to the building fabric and energy efficient services to minimise energy demand. These include passive measures, reducing water usage to 105 litres per day and minimising overheating risks with natural ventilation. Guest room positioning and internal layout are optimised to provide natural daylight, reducing reliance on artificial lighting. Active measures are also proposed. 100% low-energy LED lighting will be used throughout the development. Mechanical heat recovery systems will minimise heating requirements during the warmer months, with a minimum efficiency of 86%. A wastewater heat recovery system with a minimum efficiency of 74% is proposed. Temperature control will be managed by smart controls in a zone system. Together, these measures will save 17.06 tonnes of CO₂ per annum, a reduction of 11.56%.
- 6.68. **Be Green:** Low-carbon technologies such as Air Source Heat Pumps are proposed. These will have a coefficient of performance of at least 2.5, saving 38.23 tonnes of CO₂ per annum, a reduction of 25.90%.
- 6.69. There are no relevant measures to be incorporated at the **Be Clean** stage as there are no existing heat networks, or currently proposed heat networks, at close enough proximity to the Site where it is technically feasible and viable to connect to. The **Be Seen** requirement for all major development proposals is to monitor and report on their actual operational energy performance for the first five years of occupation.

6.70. The proposed refurbishment will result in an overall saving of 102.88 tonnes of CO₂ per annum, a total cumulative reduction of 69.69%. The energy efficiency of the building will also be significantly improved. In comparison to a new build scheme, refurbishing the existing building will generate significant embodied carbon savings.

6.71. The proposed improvements to the energy efficiency of the building will reduce the CO₂ emissions for the existing building and therefore mitigate its impact on climate change within the borough. Therefore, the proposed alterations to the existing building are in accordance with Local Plan Policies CC1, CC4 and London Plan Policies SI 1 and SI 4.

Transport

6.72. Local Plan Policy T4 requires a transport statement to be submitted with development proposals to ensure "impacts on the capacity of the transport network are fully assessed". The Transport Statement submitted as part of this application considers the baseline conditions, proposed changes in infrastructure and resulting differences and draws on the Travel Plan and Delivery and Servicing Management Plan.

6.73. The above submitted report demonstrates that the site is accessible by transport modes that have the potential to reduce reliance upon the private car. In this regard, it is considered that the location of the site accords with paragraphs 109 of the National Planning Policy Framework as set out in Section 2 and as such gives future residents a genuine choice about how they travel.

Parking

6.74. Local Plan Policy T1 promotes sustainable transport methods by prioritising walking, cycling and public transport in the borough. London Plan Policy T2 also promotes the reduction of car dominance and the increase in walking, cycling and transport use. Local Plan Policy T2 requires all new developments in the borough to be car-free.

6.75. The Site has a PTAL rating of 6(B), the highest possible score. The Site is located a short walk from Holborn Underground Station, serviced by the Central and Piccadilly Lines, and Chancery Lane Underground Station, serviced by the Central Line. National and International rail links are also within close proximity to the Site at Euston, Kings Cross and St Pancras stations. The site is located in the CAZ and benefits from high proximity of amenities and other town centre uses.

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



6.76. The proposed site does not have any vehicle access into the buildings and the development is currently car-free. Bedford Row has existing marked residential permit parking holder bays along both sides of the carriageway. Accessible parking is located along Red Lion Street 120m from the site. Blue badge holders may also park on single yellow lines closer to the site for up to 3 hours.

6.77. The highly accessible and sustainable location in Central London precludes the provision of any car parking. The analysis shows that the predicted trips from the apart-hotel will predominantly use the Underground or alternative light rail choices, buses or by foot to reach the site. The development will therefore remain car-free in accordance with policy.

Cycling

6.78. Local Plan Policy T1 promotes cycling, directing development to provide accessible and secure cycle parking facilities. London Plan Policy T5 sets out the appropriate levels of cycle parking according to the use and size of the development.

6.79. The current site does not include any cycle parking. A dedicated long-stay cycle store is proposed, with a step-free access to Jockey's Fields. Three cycle parking spaces are provided in accordance with London Plan Policy T5. The requirement for short-stay cycle parking for the proposed use is two cycle spaces. The development site abuts directly onto the local footway (LBC highway) and therefore there is no space to accommodate dedicated short-stay cycle parking for visitors. The proposed strategy will be to encourage visitors to utilise the existing Sheffield cycle stands (9 stands/18 spaces) located to the front of the development on Bedford Row directly outside the building.

6.80. The proposed provision of long-stay cycling facility will encourage journeys by cycling in accordance with Local Plan Policy T1 and London Plan Policy T5.

Servicing

- 6.81. Local Plan Policy A1 seeks to manage the impact of development by transport impacts such as servicing. Policy A4 states that conditions will usually be applied to require servicing to take place between the hours of 08:00 to 20:00. Developments requiring deliveries outside of these times will need to demonstrate there will be no adverse impact in an acoustic report. Policy T4 requires developments of over 2,500 sqm that are likely to generate significant movement by road to provide a Delivery and Servicing Plan. While the development is under this threshold and not expected to generate significant movements, a Delivery and Servicing Plan accompanies this application.
- 6.82. Servicing for the site will be primarily undertaken via Jockey's Fields to the rear of the development. Measures will be in place to ensure deliveries and waste collection via Jockey's Fields is carried out only using 6.7m long vehicles or less. Longer vehicles will be able to access the site from Bedford Row.
- 6.83. The quantum of service vehicle trips is anticipated to reduce when compared to the existing office use. Site management will liaise with occupiers to manage the arrival of deliveries with the aim of avoiding deliveries during peak hour on the highway network and to avoid peaks in delivery activity on site.
- 6.84. The Delivery and Servicing Management Plan accompanying this application sets out further details on the day-to-day servicing of the development.

7. Conclusion

- 7.1. The Proposal seeks to change the use of the existing office buildings at 14 Bedford Row and 12-13 and 14 Jockey's Fields to a class C1 apart-hotel use.
- 7.2. This application meets the policy tests of LBC's Local Plan Policy E2, which seeks to protect existing employment space within the borough. Through 2+ years of marketing evidence, compiled by CBRE, it is clear that the existing office building does not meet the needs of a modern office, due to its deep, cut-up floorplates, lack of end-of-journey facilities and inaccessibility.
- 7.3. The Applicant recognises this opportunity to reinvigorate the Site and deliver an apart-hotel that will support the wider strategic aims of the London Plan and the Camden Local Plan through the delivery of a key piece of visitor infrastructure within the Central Activities Zone, in proximity to many destinations and attractions.
- 7.4. The proposed high-quality and sustainable apart-hotel will restore and bring back into use a vacant listed building and safeguard it for future conservation. The change of use will bring a vacant heritage asset back into long-term use, whilst contributing to its significance within the Bloomsbury Conservation Area. The proposal will enhance and optimise the environmental performance of the buildings by retaining and upgrading the building fabric and services strategy within the building envelope as part of retro-first approach to minimise both embodied and operational carbon.



8. Appendix 1: Planning History

14 Bedford Row

Application Reference	Description of Development	Decision
2014/4323/L	(LBC) Alterations to acoustic screen on rear flat roof (as amendment to Listed Building Consent 2013/1562/L).	Granted 08/08/2014
2014/3408/P	(NMA) Increase in height of the acoustic screen and incorporating louvers at low level under planning permission 2013/1179/P dated 02/05/2013.	Granted 08/08/2014
2013/7819/L	(LBC) Addition of mullion to windows, and alterations to rooflight.	Granted 17/02/2014
2013/7944/P	(NMA) Addition of mullion to windows, and alterations to rooflight approved under planning permission 2013/1179/P dated 2/5/13.	Granted 17/02/2014
2013/1179/P	External alterations to include the replacement of existing windows, roof covering, and acoustic screen, installation of new handrails and repositioning of existing handrail to Jockey's Field block and Bedford Row office buildings (Class B1).	Granted 02/05/2013
2013/1562/L	(LBC) External alterations to include the replacement of existing windows, roof covering, and acoustic screen, installation of new handrails and repositioning of existing handrail to Jockey's Field block and Bedford Row office buildings (Class B1).	Granted 02/05/2013
2012/3111/P	Alterations to third floor and roof to the rear for: replacement of the existing covering to the flat roof, raising of a section of the parapet and relocation of the safety handrails along the northeast and southwest elevations, Installation of photovoltaic panels on the flat roof and the replacement of the existing single / double glazed windows all associated with the use as Offices (Class B1).	Granted 10/08/2012

14 Bedford Row and 12-13 and 14 Jockey's Fields, WC1R 4ED

Planning Statement



12-13 Jockey's Fields

Application Reference	Description of Development	Decision
2016/1351/P	Installation of electric vehicle charging points on the Gray's Inn Estate, at 12-15 Jockey's Fields, South Square, Gray's Inn Square and adjacent to 1 Verulam Buildings.	Granted 04/08/2016
PS9804708R2	Change of use of 12 and 13 Bedford Row from office (Class B1) to residential (Class C3) to provide 2 single family dwelling houses, and the introduction of 2 single garages, plus internal and external alterations, the part demolition and rebuilding of the rear extension to no 12 Bedford Row and the erection of a double height glazed extension to rear of 13 Bedford Row, as shown on drawing numbers, 9856/D01C, D04, S5, D05A, D06A, D02B, D03B, C03B, accompanying letters relating to repair and refurbishment of sash windows and window sills (5.1.99); repair and replacement of cornices (5.1.99); rear elevation repairs(18.12.98);floor adjustment (18.12.98); fire protection (15.3.99); statement in regard to the construction of a glass extension to rear of 13 Bedford Row (11.3.99); survey of architectural features (July 1998). Existing:- 9865/S1A, S2A, S3A, S4.	Granted 22/04/1999