

Application ref: 2023/4954/L  
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Date: 12 August 2024

**Development Management**  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE

Phone: 020 7974 4444

[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

The Heritage Practice Ltd.  
10 Bloomsbury Way  
London  
WC1A 2SL

Dear Sir/Madam

## **DECISION**

Planning (Listed Building and Conservation Areas) Act 1990

### **Listed Building Consent Granted**

Address:

**21-23 Bedford Place**  
**London**  
**WC1B 5JJ**

Proposal:

Restoration and refurbishment of the existing hotel including modifications to internal layout at all levels; rear extensions at lower-ground, first, and second levels; provision of rear terrace at ground floor level; insertion of internal lift at no.22; replacement windows throughout; and installation of plant at roof level and within rear courtyard vaults.

Drawing Nos:

Existing Drawings:

(Prefix 2205-SPP-BP-) ZZ-DR-A-02-0100 P01, B1-DR-A-02-1000 P02, 0G-DR-A-02-1001 P02, 01-DR-A-02-1002 P02, 02-DR-A-02-1003 P02, 03-DR-A-02-1004 P02, 0R-DR-A-02-1005 P02, ZZ-DR-A-02-2001 P01, ZZ-DR-A-02-2002 P01, ZZ-DR-A-02-2003 P01, ZZ-DR-A-02-2004 P01, ZZ-DR-A-02-3001 P01, ZZ-DR-A-02-3002 P01, ZZ-DR-A-02-3003 P01, B1-DR-A-02-3501 P01, 0G-DR-A-02-3502 P01, 01-DR-A-02-3503 P01, 02-DR-A-02-3504 P01, 03-DR-A-02-3505 P01

Demolition Drawings:

(Prefix 2205-SPP-BP-) B1-DR-A-95-1001 P02, 0G-DR-A-95-1002 P02, 01-DR-A-95-1003 P02, 02-DR-A-95-1004 P02, 03-DR-A-95-1005 P02, 0R-DR-A-95-1006 P02, ZZ-DR-A-95-2001 P02, ZZ-DR-A-95-2002 P02, ZZ-DR-A-95-2003 P02, ZZ-DR-A-95-2004 P01, ZZ-DR-A-95-2005 P01, ZZ-DR-A-95-3001 P01, ZZ-DR-A-95-3002 P01, ZZ-DR-A-

95-3003 P01, B1-DR-A-95-3501 P02, 0G-DR-A-95-3502 P02, 01-DR-A-95-3503 P02, 02-DR-A-95-3504 P02, 03-DR-A-95-3505 P02

Proposed Drawings:

(Prefix 2205-SPP-BP-) ZZ-DR-A-00-0100 P01, B1-DR-A-20-1001 P03, 0G-DR-A-20-1002 P03, 01-DR-A-20-1003 P02, 02-DR-A-20-1004 P02, 03-DR-A-20-1005 P02, 0R-DR-A-20-1006 P02, B1-DR-A-21-4001 P01, 0G-DR-A-21-4002 P01, 01-DR-A-21-4003 P01, 02-DR-A-21-4004 P01, 03-DR-A-21-4005 P02, 03-DR-A-21-4006 P01, 03-DR-A-21-4007 P01, ZZ-DR-A-24-1001 P01, ZZ-DR-A-24-4001 P01, ZZ-DR-A-25-3001 P02, ZZ-DR-A-25-3002 P02, ZZ-DR-A-25-3003 P01, ZZ-DR-A-25-3004 P01, ZZ-DR-A-25-3005 P01, ZZ-DR-A-25-3006 P01, ZZ-DR-A-26-2001 P02, ZZ-DR-A-26-2002 P02, ZZ-DR-A-26-2003 P02, ZZ-DR-A-26-2004 P02, ZZ-DR-A-26-4001 P01, ZZ-DR-A-26-4002 P02, ZZ-DR-A-26-4003 P02, B1-DR-A-26-4004 P02, ZZ-DR-A-26-4005 P02, ZZ-DR-A-27-4001 P02, B1-DR-A-31-4001 P01, B1-DR-A-35-1001 P02, 0G-DR-A-35-1002 P02, 01-DR-A-35-1003 P02, 02-DR-A-35-1004 P02, 03-DR-A-35-1005 P02

Documents:

Cover Letter (prepared by The Heritage Practice, dated 10 November 2023); Design and Access Statement P01 (prepared by SPPARC, dated November 2023); Design and Access Statement Addendum P02 (prepared by SPPARC, dated January 2024); Design and Access Statement Addendum P03 (prepared by SPPARC, dated March 2024); Heritage Appraisal (prepared by The Heritage Practice, dated November 2023); Engineering Report (prepared by DDA Engineers, dated November 2023); Existing Door Schedule P02; Existing Door Schedule Appendix P02; Fireplace Schedule and Strategy (prepared by SPPARC); Arboricultural Impact Assessment (prepared by Landmark Trees, dated 01 July 2024); Energy Assessment Strategy Report P06 (prepared by Meinhardt, dated 05 April 2024); Energy Strategy Summary Note (prepared by Meinhardt, dated 09 April 2024); BREEAM Pre-Assessment (prepared by Meinhardt, dated 10 October 2023); Planning Fire Safety Strategy (prepared by OFR Consultants, dated 03 November 2023); Noise Impact Assessment (prepared by Clarke Saunders Acoustics, dated 03 November 2023); Basement Impact Assessment Rev 3 (prepared by CGL, dated March 2024)

The Council has considered your application and decided to grant Listed Building Consent subject to the following condition(s):

Conditions And Reasons:

- 1 The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing Drawings:

(Prefix 2205-SPP-BP-) ZZ-DR-A-02-0100 P01, B1-DR-A-02-1000 P02, 0G-DR-A-02-1001 P02, 01-DR-A-02-1002 P02, 02-DR-A-02-1003 P02, 03-DR-A-02-1004 P02, 0R-DR-A-02-1005 P02, ZZ-DR-A-02-2001 P01, ZZ-DR-A-02-2002

P01, ZZ-DR-A-02-2003 P01, ZZ-DR-A-02-2004 P01, ZZ-DR-A-02-3001 P01, ZZ-DR-A-02-3002 P01, ZZ-DR-A-02-3003 P01, B1-DR-A-02-3501 P01, 0G-DR-A-02-3502 P01, 01-DR-A-02-3503 P01, 02-DR-A-02-3504 P01, 03-DR-A-02-3505 P01

Demolition Drawings:

(Prefix 2205-SPP-BP-) B1-DR-A-95-1001 P02, 0G-DR-A-95-1002 P02, 01-DR-A-95-1003 P02, 02-DR-A-95-1004 P02, 03-DR-A-95-1005 P02, 0R-DR-A-95-1006 P02, ZZ-DR-A-95-2001 P02, ZZ-DR-A-95-2002 P02, ZZ-DR-A-95-2003 P02, ZZ-DR-A-95-2004 P01, ZZ-DR-A-95-2005 P01, ZZ-DR-A-95-3001 P01, ZZ-DR-A-95-3002 P01, ZZ-DR-A-95-3003 P01, B1-DR-A-95-3501 P02, 0G-DR-A-95-3502 P02, 01-DR-A-95-3503 P02, 02-DR-A-95-3504 P02, 03-DR-A-95-3505 P02

Proposed Drawings:

(Prefix 2205-SPP-BP-) ZZ-DR-A-00-0100 P01, B1-DR-A-20-1001 P03, 0G-DR-A-20-1002 P03, 01-DR-A-20-1003 P02, 02-DR-A-20-1004 P02, 03-DR-A-20-1005 P02, 0R-DR-A-20-1006 P02, B1-DR-A-21-4001 P01, 0G-DR-A-21-4002 P01, 01-DR-A-21-4003 P01, 02-DR-A-21-4004 P01, 03-DR-A-21-4005 P02, 03-DR-A-21-4006 P01, 03-DR-A-21-4007 P01, ZZ-DR-A-24-1001 P01, ZZ-DR-A-24-4001 P01, ZZ-DR-A-25-3001 P02, ZZ-DR-A-25-3002 P02, ZZ-DR-A-25-3003 P01, ZZ-DR-A-25-3004 P01, ZZ-DR-A-25-3005 P01, ZZ-DR-A-25-3006 P01, ZZ-DR-A-26-2001 P02, ZZ-DR-A-26-2002 P02, ZZ-DR-A-26-2003 P02, ZZ-DR-A-26-2004 P02, ZZ-DR-A-26-4001 P01, ZZ-DR-A-26-4002 P02, ZZ-DR-A-26-4003 P02, B1-DR-A-26-4004 P02, ZZ-DR-A-26-4005 P02, ZZ-DR-A-27-4001 P02, B1-DR-A-31-4001 P01, B1-DR-A-35-1001 P02, 0G-DR-A-35-1002 P02, 01-DR-A-35-1003 P02, 02-DR-A-35-1004 P02, 03-DR-A-35-1005 P02

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Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 3 All new work and work of making good shall be carried out to match the

existing adjacent work as closely as possible in materials and detailed execution.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 4 Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:

- a) Before work begins, the proposed manufacturer's specification details and samples of all facing materials (brickwork for rear extensions), are to be submitted to the Local Planning Authority to be approved in writing with the Local Planning Authority.

- b) Before the relevant parts of the works have commenced, a sample panel of the approved facing brickwork demonstrating the proposed face-bond and pointing (joint dimensions, mortar mix, profile and finish) shall be provided on site and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given. The approved panel shall be retained on site until the works have completed.

- c) Samples of the proposed film material/application presentation for the third floor blind windows shall be submitted to and approved in writing by the Local Planning Authority before the relevant part of the work is begun.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 5 Prior to commencement of relevant works, Reflected Ceiling Plans of the proposed lighting scheme shall be provided. The plans shall demonstrate no recessed downlights are to be installed into lathe and plaster ceilings or in primary or street facing rooms.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 6 Detail drawings to be provided showing the design and detail of the proposed service platform lift located within the front lightwell. Details shall demonstrate no railings cut and a free standing structure.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 7 Unless otherwise confirmed on the Approved Plans, all fireplaces (including surrounds and grates) are to remain in-situ. Features confirmed to be removed that are not to be relocated and installed elsewhere in the building must be retained on site.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

Informative(s):

1 Reasons for granting listed building consent:

The proposal includes restoration and refurbishment of the three Grade II listed buildings at nos. 21-23 Bedford Place, under the existing hotel use. Works comprise modifications to internal layout at all levels; rear extensions at lower ground, first, and second levels; insertion of internal lift at no.22; replacement windows throughout; and installation of plant at roof level and within rear courtyard vaults.

Rear Extensions:

The existing rear closet wings at first and second floors would be further extended by 1m and infills provided between the three closet wings at lower ground floor level. The extensions are considered minor in scope and scale and will not cause any additional harm to the listed buildings, as the closet wings are of modern construction. The infills at lower ground floor level, and associated roof terrace at ground floor level, would not be publicly visible and have been detailed with setbacks of 1m from the existing rear elevation line to provide delineation and allow the original staggered form between closet wings. The contemporary full height glazing detail of the infills will also aid in delineating them as lightweight modern additions separate from the traditional bulk of the host buildings.

Window Joinery & Front Platform Lift:

Along the front elevation the existing 1-over-1 sash windows would be replaced with new units with a 6-over-6 fenestration pattern at ground, first, second floors and 3-over-3 at lower ground, second (rear), and third floors. While there would be harm in the loss of the existing units which although not original are traditional, it is considered that their replacement is acceptable given it would reintroduce the original Georgian joinery order/pattern that is evident down the rest of the listed terrace. This would also rationalise and unify the fenestration pattern across the elevations of all three townhouses. New traditional units located in the bulk of the host building are appropriately 9mm single glazed, timber framed and detailed with 13mm lambs-tongue glazing bar profiles such that the any aesthetic and visual harm would be negated.

At third floor level, four windows (three front, one rear) would be obscured due to the internal planform changes, division of the rooms, and provision of the lift. These three units would be retained as joinery units with back panels set behind the units and a dark grey film applied to the glazing so that they continue to present as windows to the street. Final approval of the proposed applied film will be secured by condition. At rear lower ground floor level, the joinery would be metal framed and have double glazing. Given their location and that no associated removal of historic fabric is proposed, they are considered acceptable.

The proposed front lightwell platform service lift has been appropriately designed and detailed to be freestanding and will ensure the retention of the existing railings. Final detail of the service lightwell lift design will be secured by condition.

#### Roof Level & Rear Vault Plant Facilities:

Provision of plant facilities in the location of the stair lightwells that are currently lit by glazed rooflight lanterns can be supported. Removal of the existing stairwell roof lanterns (which are later C20 fabric) and their infilling to provide plant accommodation in the inset above, has been detailed to mitigate external and internal harm. From the internal stair a backlit oval false rooflight would be provided such that the spatial character of an open rooflight/lightwell is retained. The roof level plant would be partially obscured by an angled louvre infill between the roof forms that would present as a continuation of the 'M' shaped roof slope and partially obscure the plant. From street level there would be no visibility of the plant, thus minimising any harm to the host listed buildings or the wider Conservation Area.

## 2 Reasons con't.

#### Changes to Internal Planform:

To facilitate the new hotel layout, it is proposed that areas of original planform would be demolished. However, the majority of demolition works where the historic planform is impacted would be limited to the secondary lower ground and third floor levels. On the primary levels, the partitions identified to be removed are predominantly modern fabric.

At ground floor level partition walls between the front and rear rooms would be reinstated. On the first floor, the three grand front rooms that are currently subdivided would be reinstated as single rooms, with pod bathrooms, allowing appreciation of their historic proportions. Restorative works to the planform these primary levels is considered to better reveal and enhance the significance.

Proposed ensuite bathrooms are located such that they are largely re-providing wet services in locations which already have plumbing, and it is accepted that they would facilitate hotel use. At ground and first floor levels the ensuites would be detailed as "pods" such that they present as piece of furniture that do not extend full-height and allow for the original proportions of the room to be fully appreciated through an intact ceiling plan.

Only four of the existing vault floors would be lowered (internal heights not to exceed 1715mm), and there would be no lateral connections.

#### Internal Lift:

The main intervention in terms of circulation is the creation of an internal lift. Options for how this feature could be accommodated were presented at pre-application stage, and it was confirmed that the proposed location at the rear of the central stair would be most appropriate; however, this unquestionably causes harm to the significance of the middle building. The lift results in an

uncharacteristic alteration to planform, the loss of historic fabric and the functional loss of the rear windows in the part occupied by the new lift shaft, although the appearance of functioning windows will be retained on the exterior of the building.

Supportability of the lift in its proposed location was dependent on it being demonstrated that the associated shaft overrun can be contained within the building, meaning that the roof form of the listed building remains intact. This detail, and a preliminary Works Methodology for the installation, has been provided and confirmed. Therefore, the creation of an internal lift is considered acceptable in this instance.

#### Fireplaces:

A site visit reconfirmed the presence of numerous original and later historic fireplaces that were not accounted for in the submitted plans and proposed to be removed. A Fireplace Schedule and Strategy has since been implemented where it has been adequately demonstrated that these features will be either retained in their current positions, or where the new layout does not allow for this, the surrounds would be relocated to within the building to corresponding rooms that maintain the corresponding hierarchy. Those on the principal ground floor level that are most highly detailed will be retained and unaltered.

### 3 Reasons con't.

#### Door Joinery:

The reconfigured planform involves the loss of a substantial number of historic (and later) door joinery. However, it has been sufficiently demonstrated and justified that the loss of the subject doors is due to their inability to be adequately upgraded to fire safety standards (due to condition and construction detail). Doors that are able to be upgraded will be retained, others will be used as blind doors, and architraves will also be retained. Where new doors are installed, they will be dimensioned to the existing openings, of a timber materiality, have traditional turn hardware. The doors will be appropriately detailed to the hierarchy of the associated floor level, with higher levels of detailing to the ground floor and first floor units.

The NPPF has two categories of harm - substantial harm and less than substantial harm. It is considered the proposals currently contain elements of less than substantial harm, in relation to the loss of fabric associated with internal planform reconfigurations. However, in this specific case the incurred harm is balanced against heritage benefits to the proposal, such as the repair of fabric, the reinstatement of some of the first-floor planform, and the better revealing of historic detailing such as cornices. Further public benefits of universal access and improved fire safety are also weighed against the identified harm.

It is therefore considered that, as amended, the proposed works have provided sufficient information to justify and balance the harm posed and the works can therefore be supported, subject to the provision of additional conditioned details to be provided.

No objections were received following statutory consultation. The planning

history of the site has been taken into account when coming to this decision.

Special regard has been attached to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

As such, the proposed development is in general accordance with policy D2 of the Camden Local Plan 2017. The proposed development also accords with the London Plan 2021 and the National Planning Policy Framework 2023.

- 4 You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
- 5 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 6 All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at [www.camden.gov.uk](http://www.camden.gov.uk)) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2023.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>



Yours faithfully

A handwritten signature in black ink, appearing to read 'DPope', written in a cursive style.

Daniel Pope  
Chief Planning Officer