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Planning Department
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8th October 2024

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BY EMAIL ONLY

Dear Sir/Madam

Application for installation of access lift to provide access from Bloomsbury Way to existing office space at 24-28 Bloomsbury Way, London WC1A 2SN

Rackham Planning are instructed by RWE (“the Applicant”) to submit an application for planning permission for the installation of an accessible lift to replace existing stairs at the entrance to the existing office accommodation at 24-28 Bloomsbury Way, London WC1A 2SN (“the Application Site” / “the Site”).

The proposal will provide an accessible lift from Bloomsbury Way to the lobby of the existing co-working office space at the site. The lift is to be installed by Sesame Access Lifts (<https://www.sesameaccess.com/>) and provide a fully accessible office space.

A number of similar access lifts have been installed in London, including at the Kimpton Fitzroy Hotel, Russell Square, also in the London Borough of Camden. The proposed lift is designed so that the stairs retract vertically into the basement area beneath the entrance creating a level platform which is then raised from street level to the entrance lobby to the office.

The lift will support the occupation of the application site as a co-working office space, managed by the applicant.

The applicant has recently secured planning permission at the application site for a roof terrace (ref: 2023/5351/P). There are other outstanding applications awaiting determination at the time of the submission of this application for cycle storage (ref: 2023/4668/P) and the installation of a new Heating, Ventilation and Air Conditioning (HVAC) system (ref: 2023/3777/P) to serve the existing office use.

The proposal is supported by justification within this letter which includes the Planning and Heritage Assessment which demonstrates that the proposal would not result in any unacceptable impacts on the surrounding environment, notably its location within the Bloomsbury Conservation Area (CA).

Site and Surroundings

The site is part of a development block that is located immediately to the north of the junction between the A40 Bloomsbury Way and Bury Place, approximately 30m south-west of Bloomsbury Square Garden, and 80m south-east of the British Museum, as shown in **image 1**.

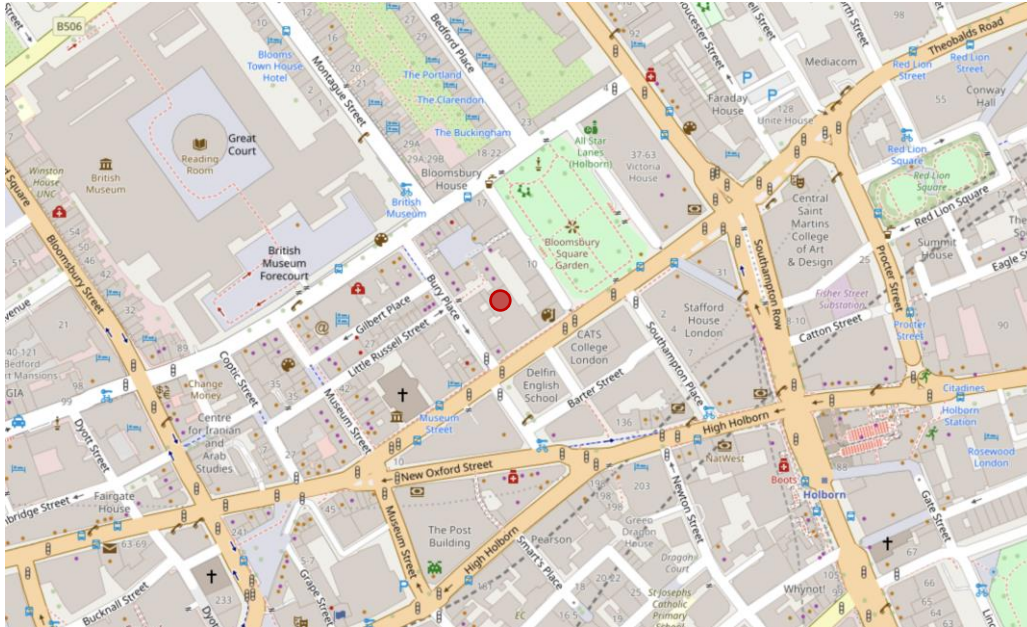


Image 1 - Site Location (source: open street map)

The surrounding area has a distinctive gridded street pattern containing small blocks of development with prevailing height of 4-6 storeys (**image 2**). The area was first comprehensively re-developed in the late 17th Century with many of the terraces being rebuilt and re-fronted during the mid-19th Century, adding variety to elevational treatments along the streets. The wider area contains a range of uses including residential, business, and culture and entertainment, with the British Museum and Nicholas Hawksmoor designed St George's Church being among the most significant and prominent buildings.



Image 2 – Aerial photograph of site and Bloomsbury Way (source: Google maps)

The building subject to this application is part 5-storey and part 4-storey in scale (**image 3**), with additional floorspace accommodated at lower ground / basement level. As **image 3** shows, the main entrance to the building is accessed off Bloomsbury Way via 5no existing steps as the ground floor is above street level.

As **image 3** confirms, the ground floor façade is constructed of stone, with the upper floors faced in red brick, with stone detailing. Existing metal railings separate the highway from the lightwell serving the basement/ lower ground floor level.

As **image 2** confirms, the building is joined at the rear to Russell Chambers mansion block and Bury Place. However the extent of the proposal relates solely to the entrance onto Bloomsbury Way. The neighbouring buildings on this frontage include Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square to the north-east, and 29 Bloomsbury Way (occupied by Richer Sounds) to the south-east, with Russell Chambers, a Mansion style block, also adjoining to the east and fronting Bury Place (**image 4**).



Image 3 – Existing access from Bloomsbury Way (source: Google maps)



Image 4 – Aerial photograph showing surrounding buildings (source: Google maps)

The Camden Local Plan Policies Map (**image 5**) confirms that the site is within the following designated areas:

- Bloomsbury Conservation Area;
- Central London Area (CLA); and
- Archaeological Priority Area (2017).

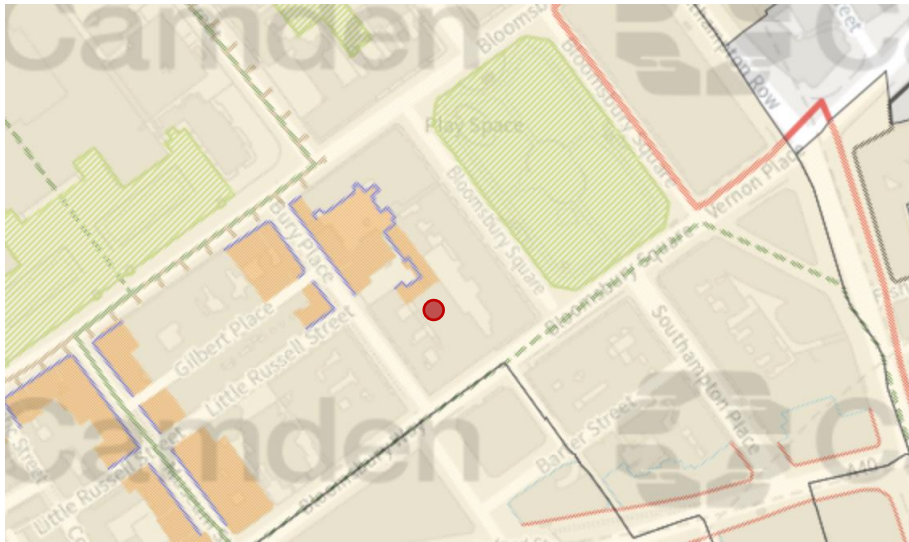


Image 5 - Camden Policies Map Extract (source: Camden Council)

The land to the north and north-west around Pied Bull Yard and the upper part of Bury Place are allocated as primary shopping frontages. Bloomsbury Square Gardens is also designated as Local Open Space. However, there are no other relevant designations covering the site. The site is not covered by a Neighbourhood Plan Area or Forum.

According to the Historic England Map (**image 6**), the adjacent Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square and the railings are Grade II Listed, with 6 Bloomsbury Garden Square together with the railings and lamp holder being Grade II* Listed.

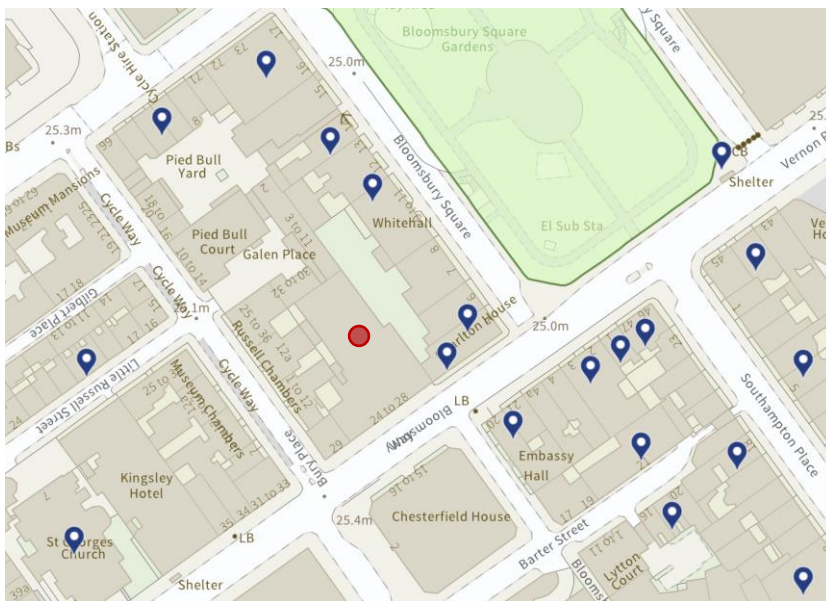


Image 6 – Historic England Map Search Extract (source: historicengland.org)

Other Listed Buildings in the immediate surrounds of the site include, the White Hall Hotel (9-11 Bloomsbury Garden Square (Grade II), 14 Bloomsbury Garden Square (Grade II), the Royal Pharmaceutical Society buildings at 16-17 Bloomsbury Garden Square (Grade II), 66-71 Great Russell Street (Grade II). In addition, 20-21 Bloomsbury Way, diagonally opposite the site frontage to the south-east is also Grade II Listed. The Hawksmoor designed Grade I Listed St George’s Church is located further to the south-west along Bloomsbury Way.

Bloomsbury Conservation Area Appraisal and Management Strategy (Adopted 18 April 2011) confirms that the application site/subject building is a ‘positive building’ in the context of Sub Area 7 (Museum Street/Great Russell Street) of the Conservation Area. The remainder of the buildings within the development block, including those immediately to the south-east along Bury Place are also deemed to be positive buildings.

Planning History

The recent planning history of the site is summarised in the table below, sourced from the Council’s online records. However, other than the recent permission for the roof terrace and current applications for the installation of new HVAC equipment and cycle storage on the lower ground floor, all previous proposals were progressed prior to the applicant having an interest in the building.

Reference	Proposal	Decision	Date
2023/5351/P	Creation of roof terrace at rear fifth floor level, including installation of associated privacy screens	Granted	24 July 2024
2023/4668/P	Installation of additional cycle storage vertical cycle racks for 40 bikes within the lower ground floor lightwell on the western side of the building.	Pending	TBC
2023/3777/P	Installation of Heating, Ventilation and Air Conditioning (HVAC) equipment	Pending	TBC
2017/6518/P	Installation of 3 x air conditioning units at lower ground floor within the partially enclosed passage.	Granted	26 Feb 2018
2012/3397/P	Installation of a condenser unit on south-west elevation at lower ground floor level of office building (Class B1)	Granted	2 Oct 2012
2012/2076/P	Erection of a roof extension and terrace at fourth floor level of office building (Class B1).	Withdrawn	29 Jun 2012
2012/0790/P	Variation of condition 3 of 2011/1243/P for the installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to critical framed double glazed windows of offices (Class B1a), namely for the installation of a condenser on the south-west elevation at lower ground floor level.	Withdrawn	15 Jun 2012
2011/1243/P	Installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to critical framed double glazed windows of offices (Class B1a)	Granted	23 May 2011

None of these applications are directly relevant to the proposal on the Bloomsbury Way entrance.

Of relevance to the proposal is the granting of planning permission at the Fitzroy Kempton hotel, Russell Square in April 2016 (ref: 2015/1673/P) for internal and external alterations to the building fenestration, roof plant and internal courtyard. An extract of the approved front elevation is shown in **image 7**. The Design & Access Statement supporting the application referred to this part of the proposal as a reconfiguration of “the main entrance steps to incorporate a concealed retracting accessible lift”.

The Heritage Statement (prepared by CgMs) supporting the application assessed the impact of the stairs on the Grade II* Listed Building. It commented “a new accessible lift is to be incorporated into the existing front stair. This will not only allow for a more convenient access into the premises, but offers a more discreet structure that does not visually intrude upon views of the main entrance”. They concluded that the lift would “suitably adapt the existing fabric to provide a more inclusive access to the hotel”.

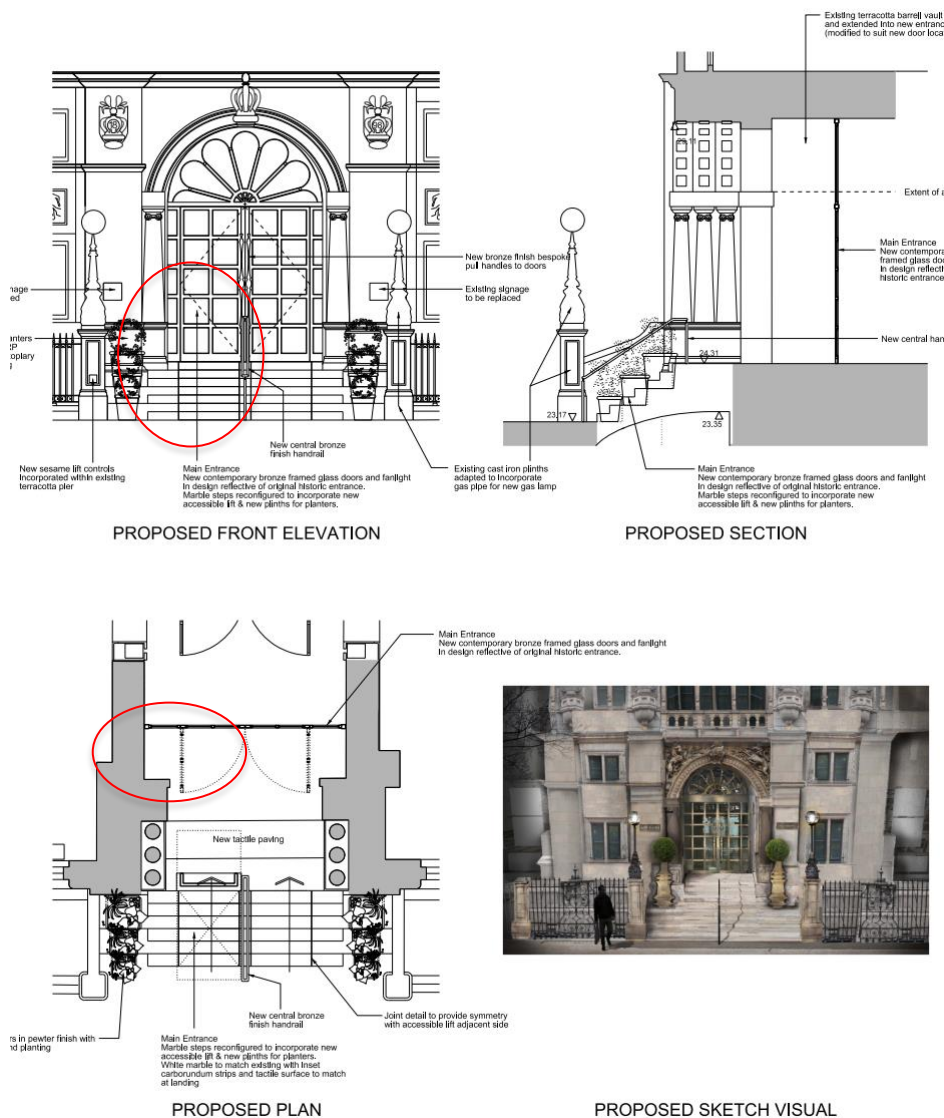


Image 7 – Extract from approved elevation – Hotel Russell/ Fitzroy Kempton (2015/1673/P)

Application Proposal

The application seeks to install a retractable access lift to replace the existing stairs providing level access from Bloomsbury Way to the raised office entrance lobby. The proposed drawings show how the lift is created by installing ‘false’ steps that retract into the basement and then raise to the entrance level.

The appearance of the steps will be clad in York stone to ensure the appearance remains the same as the existing stairs serving the building (visible in **image 3**). When not in use, the stairs and access remain unchanged from the existing, original appearance. The lift is operated by a control panel located adjacent to the lift.

The application is supported by the following documents:

- Application forms and completed certificate of ownership;
- Site Location Plan (drg ref: RWE-INT-BLO-G-DR-I-90-106-P00);
- Existing and Proposed Front Elevations (unchanged);
- Existing and Proposed Ground Floor Plan (unchanged) (drg ref: RWE-INT-BLO-GF-DR-I-10-102-P14);
- Proposed 3D Layout (drg ref: 1517 1/6);
- Proposed Pit Requirements (drg ref: 1517 2/6);
- Pit Details (drg ref: 1517 3/6);
- Proposed Elevations/ Sections (drg ref: 1517 4/6);
- Lift Layout (drg ref: 1517 5/6);
- Button Station and hydraulic requirements (drg ref: 1517 6/6);

Planning Policy and Assessment

This section assesses the proposal against the relevant national and local planning policy and guidance. The plan-led approach to development, as enshrined by Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to accord with the adopted Development Plan unless material considerations indicate otherwise.

The Development Plan for Camden Borough is principally formed by:

- The London Plan (2021); and
- The Camden Local Plan (2017).

In physical terms, the proposals relates solely to the entrance stairs providing access to the site from Bloomsbury Way. It will provide a new accessible lift to enable full access to the office space. Internally existing lifts provide access to all upper floors as well as the basement.

There is considered to be no issue in respect of the principle of the proposal and its desire to improve access to the office use. This is supported by **policy C6** (Access for all) which seeks to promote fair access for all “*and remove the barriers that prevent everyone from accessing facilities and opportunities*”. Part a) of this policy “*expect[s] all buildings and places to meet the highest practicable*

standards of accessible and inclusive design so they can be used safely, easily and with dignity by all". The proposed lift will clearly meet this policy objective.

The lift operates silently by an electric motor and there is not considered to be any issues or concerns relating to the impact on the amenity of neighbouring occupiers in Russell Chambers or Bloomsbury Square.

It is considered that the two principal issues requiring an assessment against the Development Plan relate to the visual impact and the impact on the character and appearance of the Bloomsbury Conservation Area (CA) as a Heritage Asset (HA).

Visual impact

Policy D1 seeks to secure high quality design that respects local context and character (part a); preserves or enhances the historic environment and heritage assets (part b); comprises details and materials that are of high quality and complement the local character (part e); is inclusive and accessible for all (part g);

The design of the lift is such that it is not visible unless in use. When not in use, it 'rests' in the existing stair position thus ensuring that its design respects the character of the building and existing appearance. The proposed details and materials are intended to replicate the existing York stone steps, thereby ensuring it also respect and preserves the local character, context and historic parts of the Conservation Area within which it is located. By providing a level access from street level to the office entrance, it is also fully accessible and inclusive.

For these reasons, the proposal is fully compliant with the relevant parts of key **policy D1** which has demonstrated that there is no harmful or adverse visual impact arising from the proposal.

Heritage Impact

The latest version of the NPPF (2023) considers proposals affecting nationally significant heritage assets. NPPF **paragraph 194** states that LPAs should *"require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting"*. **Paragraph 195** covers the LPA's role in assessing significance and impacts. Paragraph 199 is clear that when considering impacts on significance of an asset *"great weight should be given to the asset's conservation"* with greater weight given the more important the asset.

Paragraph 200 requires that any harm to or loss of significance of an asset should require *"clear and convincing justification."* **Paragraphs 200 to 203** provide two tests depending on whether there is *"substantial harm to or loss of"* the asset, or *"less than substantial harm"* to the asset.

In the former case, the Framework directs that consent should be refused unless harm is necessary to achieve substantial public benefits that outweigh the harm or loss. In the latter case, harm should be weighed against public benefit.

Paragraph 7.41 of the Local Plan introduces the Council’s heritage policy. It states that *“The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas.”*

The same paragraph references the NPPF’s requirement that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance.

Local Plan **Policy D2** (Heritage) sets expectations for development affecting designated heritage assets, conservation areas, archaeology, and non-designated assets. The Policy echoes the NPPF, in that impacts are weighed against the public benefits.

London Plan **Policy HC1** (Heritage Conservation and Growth) states that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.”* The policy also specifies that cumulative impacts as a result of incremental change should also be actively managed.

In respect of the context of the application site, which includes Bloomsbury Conservation Area, Bloomsbury Square Registered Park and Garden, various listed buildings on Bloomsbury Square and Bloomsbury Way and the grade I listed Church of St George, before undertaking an appraisal of the impact of the proposal and use on the significance of these assets.

- *Bloomsbury Conservation Area* – The proposed access lift would only be visible temporarily from Bloomsbury Way when in use. When not in use the lift remains as a set of stairs that have the same appearance as the existing stone stairs. For this reason and given their size, they are not prominent or dominant within the CA and would not erode or harm the designation’s heritage value, which relates to the formally planned arrangement of streets, contrasting leafy squares, together with the area’s morphology and high quality 17th to 19th Century built form.
- *Bloomsbury Square Registered Park and Garden* – The proposal would not result in any physical effect on the Bloomsbury Square Registered Park and Garden meaning that the heritage values of this asset would be wholly unchanged and preserved. There are no views to or from this heritage asset and therefore all views would remain unaltered. Therefore there will be no effect on the asset’s significance or the ability to appreciate its significance.
- *Listed Buildings to the east / on the west side of Bloomsbury Square* – The significance of the buildings are best appreciated from the front and the proposal on Bloomsbury Way would not alter these views. The lift would not be visible from the Square, even when in use. As a result, there would be no effect on the significance of these assets.
- *Church of St George (grade I)* – The building is located approximately 75m north-west of the application site, though there is no intervisibility between the church and lift. The proposal would therefore not result in any visual or experiential change to the setting of the Church of St George. Key views of the Church from Bloomsbury Way would be unaffected. Overall there would be no perceptible change to the significance or setting of the Grade I Listed building.

In conclusion the only change to the Conservation Area would be when the lift is in use for a short, temporary periods of time. When not in use, the proposal will have the same appearance as the existing stairs. As a result there is no impact on the setting and significance of the surrounding assets. The lack of visibility and minor nature of the proposed lift lead to the conclusion that the proposal will not have any harmful impact on the character or appearance of the CA. As a result of there being no harm to the heritage assets, there is no requirement in the NPPF to assess the public benefits against the harm.

However if this exercise were required to be undertaken, then the provision of an access lift to allow all to access the building is considered to be a public benefit to which significant weight would be attached.

The Assessment therefore is considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance, including Local Plan Policy D2 and London Plan Policy HC1. This is sufficient to ensure that there would be preservation for the purpose of the decision maker's duty under Sections 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990.

Conclusion

On this basis, the proposal is considered to meet the relevant planning policy requirements in terms of visual impact and heritage impact, while also facilitating an accessible commercial office building in this part of Central London.

A variation of the proposed lift has been supported by the Council on a Grade II* Listed Building (Fitzroy Kempton). Whilst each site is assessed on its merits, this assessment has concluded that there is no harm caused to the Conservation Area or nearby heritage assets.

For these reasons, in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposal accords with the Development Plan and there are no material considerations that indicate anything other than that planning permission for the development should be granted.

If you wish to discuss any issues raised herein, please do not hesitate to contact Stuart Rackham (07841 674794/ stuart@rackhamplanning.co.uk).

Yours faithfully



Rackham Planning Limited

Enc. As Above

CC: Runway East; Interaction