4-5 Bedford Square
Combined Planning & Listed Building Consent Application

Combined Planning, Heritage and Design & Access Statement

December 2010

SCOTT BROWNRIGG
PLANNING

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Planning, Heritage and Design and Access Statement

Subject:
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APPENDIX 1 - Photographs

Amendment Record

This report has been issued and amended as follows:

Revision	Description	Date	Signed	Checked
	Statement	Dec 10	GB	CT

Note:
This report, together with further reports accompanying the planning application relate to the present situation and may be subject to supplementary information as discussions progress with the Local Authority.

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Planning, Heritage and Design and Access Statement to Accompany a Combined Planning and Listed Building Consent Application for 4-5 Bedford Square, Camden, WC1B 3RD

1.0 Introduction

1.1 This combined Historic Building and Design and Access Statement has been prepared by Scott Brownrigg in support of a Combined Listed Building Consent and Planning Application for works to 4-5 Bedford Square, a Grade I Listed Building.

1.2 Section 42 of the Planning and Compulsory Purchase Act 2004 substituted Section 62 of the Town and Country Planning Act 1990 and amended Section 10 of the Listed Building Act. Under the new section, instead of the form used to apply for planning permission being left to the discretion of the authority, the Secretary of State is now given the power to prescribe by development order alone the content and form of applications and the manner in which they are to be handled.

1.3 Accordingly Article 4C of the General Permitted Development Order and regulation 3A of the Listed Building Regulations, set out the detailed requirements for a statement in relation to planning permissions and listed building consents respectively.

1.4 The statement should explain the design principles and concepts that have been applied to particular aspects of the proposal, including the amount, layout, scale, landscaping and appearance of the development as well as access issues. This statement is commonly known as a Design and Access Statement (DAS).

1.5 Some of the standard requirements of a DAS are not required for listed building consent applications, for example information on use, amount and landscaping.

1.6 Therefore, the purpose of this statement is to clearly set out and consider all the relevant aspects of the proposed development, the justification for the works to the listed building, the national and local planning policy relevant to the application and an assessment of how the proposed development accords with those requirements.

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2.0 Application Details

2.1 This is combined listed building consent and planning application is for:

The instillation of 4 x air conditioning condenser units on the roof of No 6 Bedford Square, to be used in relation to the attached 4-5 Bedford Square, and the instillation of associated pipe work.

2.2 The application comprises the following:

- RT-001: Completed One-App Forms and Certificates
- RT-002: Combined Heritage/Design & Access Statement
- Site Location Plan
- Fee in relation to Planning Application (£335)

2.3 The following drawings are also provided:

- 3110/M/1 Rev A - Basement
- 3110/M/2 Rev A - Ground Floor
- 3110/M/3 Rev A - First Floor
- 3110/M/4 Rev A - Second Floor
- 3110/M/5 Rev A - Third Floor
- 3110/M/1 Rev A - Roof Plan

2.4 These drawings provide details of all the relevant aspects of the application, including the number, type and location of the condenser units, the layout of the internal, under floor, pipe work and the position of the internal units.

2.5 The drawings should be considered in conjunction with the detailed analysis within the statement.

3.0 Site Description

3.1 Between the latter half of the 17th and early years of the 19th century, several large estates were laid out in the western area on London. One such estate was that of the Duke of Bedford's Bloomsbury estate, of which Bedford Square was a central part.

3.2 The square itself is formed of uniform palace-fronted terraced houses, with stucco faced and pedimented buildings located in the centre of each terrace. On the north and south there are two centre houses (18 & 19 and 46 & 47 respectively) and on the east and west sides just one (6 & 32 respectively).

3.3 The buildings that are the subject of this application are 4-5 Bedford Square, two of the properties that form the entire eastern run (1-10) which is Grade I listed. 4-5 would originally have been two separate properties but they have long since been co-joined.

3.4 4-5 Bedford Square immediately adjoins 6 Bedford Square, one of the more ornate stuccoed central buildings. No 6 is currently owned and operated by New York University and they have recently purchased 4-5 as well.

3.5 The buildings also lie within the wider Bloomsbury Conservation Area.

3.6 A full description of the heritage assets is provided in Section 6 below.

4.0 Planning History

4.1 As might be expected with a building of this age, there is a long planning history associated with the site. The most relevant of these applications are detailed below.

4.2 Earlier this year Listed Building consent was granted for various internal and external alterations to the property under 2010/0126/L. The alterations included the repair of external railings, steps to the entrance way, external cladding and instillation of waterproofing to the vault areas.

4.3 Internal renovations were also undertaken, with modern partitions removed, windows repaired, replacement lighting and ironmongery, repairs to plasterwork and redecoration. This application was made as the building was becoming vacant and there was a requirement to undertake a comprehensive repair and maintenance schedule of the building. These works have now largely been implemented and completed.

4.4 Alterations to stud partitioning, the instillation of new partitions on all floors and the instillation of date and power cables and associated fixings throughout were approved in 2006 under application 2006/1518/L.

4.5 In 2005 flexible planning permission was granted for the building to be used as either a non-residential institution (D1) or offices (B1). The D1 use was implemented when the building was previously occupied by the Aga Khan University.

4.6 Prior to this, in 2003, planning permission had been granted for a straight change of use from B1 (office) to D1 (non-residential institution). However, this was superseded by the 2005 consent.

4.7 Buildings 1-10 (inclusive) Bedford Square were subject of a significant refurbishment in the early 1980s. This included alterations to the front and rear elevations and other internal alterations. It is likely that the steel beams, which are prevalent throughout the building, were added at this stage.

5.0 Planning Policy

5.1 Legislation to control works affecting Listed Buildings is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. This is further amplified by in national planning policy guidance as set out in PPS 5.

National Planning Guidance - PPS 5

5.2 Planning Policy Statements (PPS) set out the Government's national policy on different aspects of spatial planning in England. PPS 5 – 'Planning for the Historic Environment' sets out the national planning policy in relation to listed buildings and Conservation Areas.

5.3 PPS 5 sets out policies on the conservation of the historic environment. Published on 23rd March 2010, this is a very recent document, which replaces PPG15, which had been in circulation for over 15 years. As one might expect, it represents a major overhaul of the planning system for the historic environment. However, the changes are evolutionary rather than revolutionary.

5.4 The key change introduced by PPS5 was the scope of assets brought under policy control. In contrast with PPG15 and PPG16, which covered only archaeology, listed buildings and conservation areas, PPS5 encompasses any 'heritage asset' considered to have some degree of significance.

5.5 This includes all nationally designated and registered assets (Listed building, Scheduled Monuments, Protected Wreck Site, Conservation Areas, Registered Park and Gardens, Registered Battlefields and World Heritage Sites), plus all locally designated heritage assets (locally listed buildings, sites of local archaeological interest etc). The definition of a 'heritage asset' is set out in Annex 2 of PPS 5, which states:

"A building, monument, site, place area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in this PPS and assets identified by the local planning authority during

the process of decision-making or through the plan-making process (including local listings)".

5.6 Policy HE6 (Para 6.3) advises that "Local Planning Authorities should not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents". This document addresses this requirement and the significance of the asset is considered in detail below.

5.7 In determining applications that would impact upon a heritage asset, Policy HE7 advises that local authorities should seek to identify and assess the particular significance of any element of the historic environment that would be affected by the relevant proposal. The following should be taken into account when considering the significance of any element:

(i) evidence provided with the application
(ii) any designation records
(iii) the historic environment record
(iv) the heritage asset themselves
(v) the outcome of consultations with any interested parties
(vi) if appropriate, expert advice from suitable consultants

5.8 The primary focus is clearly aimed at preserving the most significant assets (PolicyHE9), with *"the more significant the designated asset, the greater the presumption in favour of its conservation should be"* (Para 9.1). As one might expect, substantial harm or loss of a listed building would only be permitted in "wholly exceptional" circumstances.

Local Planning Policy - Local Development Framework

5.9 The introduction of the Planning and Compulsory Purchase Act 2004 means that Local Plans will be replaced with a suite of planning documents, which is known as the Local Development Framework.

Core Strategy

5.10 The Core Strategy, which will provide the overarching principles of the LDF and sets out the key elements of the Council's planning vision and strategy for the borough, is due to be adopted on 8th November 2010.

5.11 CS 14 - Promoting High Quality Places and Conserving Our Heritage: The Council will ensure that Camden's places and buildings are attractive, safe and easy to use. In relation to listed buildings it will seek to preserve and enhance heritage assets, including listed buildings and conservation area.

5.12 The policy will also seek to ensure the highest standards of access in all buildings and places and require schemes to be designed to be inclusive and accessible.

Camden Development Policies

5.13 This is another of the suite of documents that will make up the LDF and, like the Core Strategy, it is expected to be adopted on 8th November 2010. However, while the Core Strategy provides overarching policies the Development Policy document deals with specific planning issues. These policies will be central in any planning decision made by the Council.

5.14 Policy DP 25 - Conserving Camden's Heritage: To preserve or enhance the borough's listed buildings, the Council will:

- Only grant change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- Not permit development that would harm the setting of the listed building.

5.15 The sub-text advises in paragraph 25.13 that *"in order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic character. Consents is required for any alterations, including some repairs, which would affect the special interest of a listed building. The matters which will be taken into consideration in an application for alterations and extensions to a listed building are those set out in Policy HE7 of PPS5.*

5.16 Paragraph 25.14 advises that *Where listed buildings are being altered for the provision of access for people with disabilities, the Council will balance their needs with the interests of conservation and policy".*

Local Planning Policy - Camden's UDP - June 2006

5.17 The Unitary Development Plan (UDP) sets out Camden's aims and priorities for the use of land in the Borough and the policies that will be used to achieve this through planning decisions. The Camden UDP was adopted in June 2006. The following policies have been identified as being relevant to the application.

5.18 B6 - Listed Buildings: The policy seeks to preserve or enhance the character of listed buildings as buildings of special architectural or historic interest and consent will only be granted for:

(b) alterations and extensions to a listed building where it considers this will not cause harm to the special interest of the building.

5.19 Under the terms of this policy the Council will also only grant permission for the change of use of a listed building where it considers this would not cause harm to its special architectural or historic interest. However, given the existing use of the site, this is not relevant in the determination of the application. The sub-text of the policy advises that Council will control external and internal works that affect the special architectural or historic interest and character of the building. Consent is required for works which would affect the character of the building.

5.20 Paragraph 3.58 advises that *"Where listed buildings are being altered for the provision of access for people with disabilities, the Council will balance their needs with the interests of conservation and policy. The listed nature of a building does not preclude the development of inclusive design solutions, and where possible access for all to, and within, listed buildings should be created"*.

5.21 B7 - Conservation Areas: The policy states that the Council will only grant consent for development in a conservation area that preserves or enhances the special character or appearance of the area. The Council will not grant planning permission for development outside of a conservation area that it considers would harm the conservation area's character, appearance or setting. There are 39 conservation areas of which Bloomsbury, in which 4-5 Bedford Square lies, is one.

6.0 The Heritage Asset Defined

6.1 In accordance with the requirements of PPS5 and, in particular Policy HE6, as set out above, it is necessary to provide a description of the heritage assets affected and the contribution to their setting to that significance.

6.2 Importantly, the policy advises that *"the level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset"* (my emphasis).

6.3 In this instance the heritage assets are clearly and readily definable as the Grade I listed terrace, which includes 4-5 and 6 Bedford Square and the Bloomsbury Conservation Area, in which the buildings are situated.

Listed Building

6.4 No's 1-10 Bedford Square are amongst some of the earliest buildings to have been listed in England, having been added to the Statutory List in October 1951. All the building, as well as the attached railings, are Grade I listed.

6.5 The official listing description sets out that the buildings were erected between 1775-1786 and attributes the design of No's 1, 6 & 10 to Thomas Leverton, with the remainder also being attributed to either him or Robert Palmer.

6.6 In fact, there is no clear record as to who designed any of the buildings and there is reasonable evidence that they were not designed by Thomas Leverton at all. While it is known that Leverton was involved in finishing off the buildings, including No 1, the overall design is not considered to be his because "*it is quite simply not good enough to be attributed to him"* (P.26: Byrne, 1990)

6.7 Indeed, despite the undoubted appeal of the overall square it could certainly be argued that the architecture is actually rather poor by Georgian standards. The plain brick houses are all plagiarised from designs that were seen forty or fifty years earlier and their main ornament, the door surrounds, were a mass manufactured product from the Coade stone factory in Lambeth. The central houses offer a little more

inspiration and certainly more detail although it is interesting to note that these do not actually offer uniformity (No 6 is two bays larger than the opposite property No 32).

6.8 The importance of the heritage asset (No 4-5) does not therefore lie in the individual design of the properties, or even their particular architectural style, but in their collective contribution to the overall development of the square.

6.9 Bedford Square was certainly not London's first square and, in spite of initial impressions, it is by no means perfect. However, it is unique as it has four uniform sides which form a 'perfect' symmetrical square around a leafy garden. Built between 1775 and 1783, its **chief importance** lies in the fact that it was the first example in London of a square with such consistent uniformity.

6.10 Moreover, the feat was never again exactly repeated. Other squares suffered from being built in "fits and starts", while Bedford Square was completed in a relatively short period of time. Fitzroy Square, for example, only had the south and east sides built to the original elevations in the 1790s. By the time that building commenced again, after the French revolution, tastes had changed and later blocks were influenced by other ideas.

6.11 Bedford Square was conceived at a time when architectural effect depended more on the treatment of complete estates rather than the design of a particular street or group of houses. Lavish fitting out of the interior was also a priority and Bedford Square manages to combine both the exterior restraint and austerity of the Palladian years (while hinting at the decorative stucco of the Regency) with the internal magnificence of the 1770s.

6.12 With so many of its contemporaries all but vanished (Adelphi and Minories) or greatly altered (Portland Place and Stratford Place) Bedford Square remains remarkably unscathed is seemingly the embodiment of all that is so highly valued in the twenty first century, an intact, uniform and perfect Georgian Square.

6.13 Like many properties of this age, 4-5 Bedford Square has been the subject to much alteration, renovation and even reconstruction over time. However, what may come as a

surprise to some admirers of Georgian Architecture is that, despite the very high standards that are set on purely aesthetic grounds, the structural story is often very different. Indeed, the consistent high quality of the facing brickwork of Georgian houses often belies the poor quality of construction of the core of the buildings, particularly of the unseen elements of the buildings.

6.14 Often designed to last for the length of their lease, many early Georgian houses, leased for 60 years, are now on their 6th life. In Bedford Square many of the foundations have failed over time apparently due to the inadequate nature of the soil on which they were placed. In order to overcome the issue originally large timber beams were inserted. However, these have been prone to rot and it is known, for example, that No 6 had to have work undertaken as early as 1889 after the owner wrote to the Estate outlining that failure of his foundations. Most properties have therefore had to be underpinned over time.

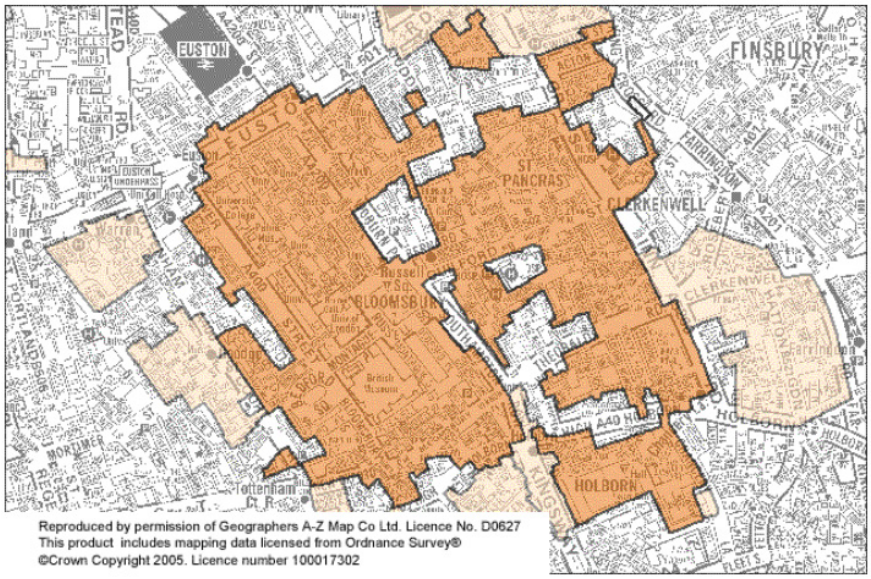
6.15 Furthermore, the walls at Bedford Square were made of two skins, an out facework, made of good quality brick (approx 4½") and an inner skin of largely poor quality brickwork of anything up to 22 ½" thick. These two walls were often not bound together, although in Bedford Square it tends to occur, on average, on every tenth course.

6.16 Softwood timbers were inserted as the brickwork carried up. These performed several essential functions, from carrying the immediate load of the beams and joists to providing a fixture point for internal joinery such as skirting and dad rails. However, in extended old age, these have often decayed, resulting in walls bulging. As a result they have often been taken out and steel ties and straps inserted. Steel beams have also been inserted into many of the floors, in order to strengthen the overall sub-standard structure.

6.17 The reason for setting out this level of detail is because the majority of the works to the building are internal and are limited to areas of the building that would not normally be seen (i.e. under floor boards). However, as can be seen, the building actually has been significantly amended and altered over time and, as is set out below, there will be no significant impacts on these areas in any instance.

Conservation Area

6.18 As can be seen below, Bloomsbury Conservation Area is of a significant size, stretching from Euston Road in the north to High Holbourn in the south and from Bedford Square in the west to Farringdon Road in the east. Bedford Square comprises just a very small element of this overall area.



Map reproduced from Camden Council Website.

6.19 As set out below, the vast majority of the works are internal. The only external elements are the provision of four small condenser units and these will be located within an existing plant area and, as such, would not be visible from any vantage point.

6.20 Therefore it is considered that there would be no impact on the Conservation Area and there is no requirement for any further description of this heritage asset.

7.0 Application Details

Purpose of the Application

7.1 Like many historic buildings, particularly those that have been converted into alternative uses, 4-5 Bedford Square currently suffers from heat gain throughout the year. This is caused by several factors, notably the use of heat generating IT systems and the higher occupation rates associated with non-residential uses.

7.2 In order to ensure that the building meets modern requirements for either a B1 or D1 occupier, it is necessary to address this issue, which will help to secure its long term viability and allow it to compete against more modern accommodation.

7.3 This, in turn, will help to ensure the continued occupation of the building. As noted within paragraph 3.59 of the UDP *"the best way of securing the upkeep of historic buildings is to keep them in active use"*.

Description of Development

7.4 The proposed development is for:

The instillation of 4 x air conditioning condenser units on the roof of No 6 Bedford Square, to be used in relation to the attached 4-5 Bedford Square, and the instillation of associated pipe work.

Proposed System

7.5 The sensitivity of the Grade I listing of the building has been at the forefront of the design solution and therefore care has been taken to ensure that any system would have minimal impact upon the building.

7.6 Consideration was originally given to only providing cooling to certain rooms, particularly those that would be more intensively used. However, although cheaper to install, such an approach means that each room that is cooled would have to be provided with its own individual condensing unit. Due to the size of the building, this was going to result in a

total of 20 condenser units, which would have had to be located externally. This was felt to be completely inappropriate.

7.7 Therefore, the proposal is for the installation of a Variable Refigerant Volume (VRV) system within the building. Although a more expensive option, which allows cooling to all rooms (indeed all the rooms have to be cooled in order to make it viable) it means, critically, that each VRV system only requires two condenser units to be installed.

7.8 In the case of 4-5 Bedford Square, in order to reduce the size of the condenser unit and the amount of pipe work required, it is proposed to have two separate VRV systems, thus resulting in just two small condenser units. The provision of two systems means that pipe work does not have to be laid across the landings. These are the only areas where there are not floor boards so it avoids having to cut into the floor.

7.9 It may be worth noting that when the pre-application drawings were submitted it was proposed to have just two larger VRV units. However, it is now proposed to have four smaller units which will be of very similar dimensions to the larger units but will be easier to install and maintain.

Pre-Application Discussions

7.10 As set out in PPS1 *"Pre-application discussions are critically important and benefit both developers and local planning authorities in ensuring a better mutual understanding of objectives and the constraints that exist"*. While this is true of all developments it is particularly true of Listed Buildings, which represent an important and finite resource. It is therefore important to engage with officers so that proposals can be fully understood and amended and adapted as required.

7.11 On this basis full details of the proposed air conditioning system, including a written statement and drawings, were sent to the Local Planning Authority on 10th September 2010.

7.12 A written response was received from Mr Charles Rose, Conservation and Urban Design Officer, on 28th September

2010. Within the response Mr Rose advised that any works would need to be checked on site, particularly in relation to the impact on the fabric in terms of location of the service riser and the notching of joists.

7.13 It was also recommended that, if possible, any new plant be positioned within the large amount of existing plant on the roof of No 6.

7.14 Following receipt of the advice a thorough investigation was undertaken of each of the proposed runs within the building. This involved lifting all the relevant floor boards in order to establish the exact runs and where any additional work might be required.

7.15 Once this exploratory work had been undertaken two important aspects were revealed. Firstly, the floors had been significantly altered in the past, including the insertion of steel beams, the replacement of many floor joists and all the floor boards and an increased depth on almost all floors. The latter element has resulted in the few original remaining elements often being built up with new timber. Therefore, there is a significant amount of space under the floorboards.

7.16 Secondly, the area under the floor boards has already been adapted to take various modern servicing, such as data cabling. This has included notching and drilling beams. Furthermore, a large amount of this modern cabling is now superfluous to requirements. For example, data cabling that has been previously fitted has now been rendered redundant through the advent of wi-fi networks and fibre optic cabling.

7.17 On this basis it became clear that pipe work for the air conditioning can be fitted with almost no impact on the historic fabric of the building. The existing runs can be used for the vast majority of the work by removing the redundant cabling and inserting the required 15mm pipe work (reduced from the 20mm originally suggested). Those areas where any new notching is required is almost exclusively within modern beams, with the exception of a very limited area on the second floor where a small amount of drilling will be required.

7.18 The proposals were reviewed on site by Mr Rose and, with the exception of some modest alterations, which have been

accommodated within this application, they were considered to be acceptable subject to an application.

7.19 The letter also set out some other modest changes, however where these require consent they will be the subject of a separate application or applications.

Instillation of Pipe Work

7.20 As well as requiring very few condenser units, one of the other key advantages of the VRV system is that it can use vary narrow pipe work. In this instance it will be just 15mm in diameter with 2 pipes attached to each unit (a total of 4 in this instance). The pipe is made of copper so it is very flexible and can be manipulated to go through existing notches or around any difficult obstacles.

7.21 The existing floorboards will simply be lifted and the pipe work placed underneath before the floor boards are replaced. As discussed above, the floors are of sufficient depth which, combined with the narrow diameter of the pipe work means this presents no difficulties. Existing notching will be used almost exclusively, particularly within any original beams. Where new notching is required it is within modern beams, notably on the third floor.

7.22 Where the pipe work needs to move from one room to another it is sometimes required to drill a small 15mm hole in the wall, below floor level, and feed the pipe work through. The holes will be no bigger than required and will be kept as minimal as possible. They will have no visual impact whatsoever and only minimal impact on the original fabric.

7.23 There is also a requirement to drill 15mm holes in two original beams on the second floor, as the pipe work enters the front class room of No 5. It may be possible to remove an existing lighting cable and utilise this run, however even if these two modest holes are required then they would not have any adverse impact on the special architectural or historic character of the building.

7.24 As discussed above, some runs were amended to ensure that no further notching was required and the drawings submitted with this application reflect these alterations.

7.25 The risers for the VRV units will be located within existing service areas. Within No 4 this is in a cupboard that is currently used for the electrics within the building and runs from basement to third floor level. Two small 15mm holes will be required between the floors in the corner of this cupboard. These would not have any adverse impact on the special architectural or historic character of the building.

7.26 Within No 5 the riser can be provided within the existing lift shaft, which has an area at the rear that is already sub-divided and used for servicing. No further works are required to accommodate this.

7.27 Details of all the proposed pipe work runs and risers are provided on the enclosed drawings.

Instillation of Internal Cooling Units

7.28 In terms of the internal air conditioning units themselves, it is proposed to use floor mounted units rather than provide modern wall mounted units, which could be incongruous with the building. The floor mounted units will then be concealed within decorative casing. This approach has been followed in No 6 to great success and the casings appear to be an historic feature (such as radiator casings).

7.29 This approach means that only two 15mm holes will be required in the floorboards, all of which are modern, and there will be no intrusive wall mounted fixtures and associated servicing.

7.30 Due to the fact that the units and casings will be freestanding within the building it is not considered that they will require Listed Building Consent, as informally discussed with the Design & Conservation Officer on site. However, details are provided here in the interest of completeness.

Instillation of External VRV Condenser Units.

7.31 Every precaution has been taken in order to ensure that the external condenser units will not be visually intrusive. The one draw back with the VRV system is that the units require a large amount of airflow and therefore they cannot be located within the pavement vaults. However, given the number of units required for an individual cooling system,

some units would also have had to be provided on the roof using the individual method in any instance.

7.32 The proposed condenser units are not particularly large, measuring just 930mm in width, 1680mm in height and 765mm in depth. This will allow them to be positioned so that they can be easily screened. Details of both the units and their proposed locations, are provided on the enclosed drawings.

7.33 Two options were originally considered for the location of the condensers, to be located on No 4 or to be located on the roof of the adjacent (but co-owned) property of No 6.

7.34 On No 4, the proposed location was within a lower area of roof adjacent to the glass dome that provides light to the central staircase area. This is located in the centre of the building and there are no views possible from outside the site due to the existing roofscape and party wall. The units would replace two existing condenser units that are already located in this area.

7.35 The Design and Conservation Officer advised that, due to the visibility of the units from the dome, this location would only be satisfactory if the overall impact of the units could be reduced from the existing situation. Following a thorough review of the system it is considered that locating the units in this area would have a greater impact on glazed dome.

7.36 Therefore, it is proposed to provide the units on the roof of the adjacent property, No 6, which is currently occupied by New York University. The significant advantage with this proposal is that there are already a number of units on the roof, arranged within a u-shape (see photographs on drawing). The proposed units will sit within this arrangement and will therefore have no greater impact than the existing situation.

7.37 Furthermore, views into and out of the site are not achievable from any adjacent point (other than on the roof tops of adjacent properties) and therefore there would be no adverse impact on either the Listed Building or the wider Conservation Area.

Noise Impact of Proposed Units

7.38 Given the roof top location of the plant it is important to assess the potential impact that they could have on any adjacent residential properties in terms of noise. In order to address this issue an Acoustic Report has been undertaken by Conabeare Acoustics and it is submitted as part of this application.

7.39 The report considers both the possible locations set out above and survey work was undertaken, in accordance with the principles of BS7745-1 (2003) in order to establish the existing background sound levels. As one would expect, these were at their lowest between 00:00 - 07:00 hours at 46.3dB(A).

7.40 It is considered that an appropriate measure is to ensure that the plant operates at 10dB(A) below the background sound level, when measured at 1 metre from the nearest effected residential property. In this instance that is a roof light that serves the top floor on 7 Bedford Square, which is approximately 13.5m away. Therefore, the plant should operate at 36dB(A).

7.41 It is calculated that at 1m the specific sound level would actually be 30dB(A), well below both the existing background noise levels and the reduced level. As such, it is considered that the external units would have no adverse impact on the occupants of any adjacent property.

8.0 Conclusions

8.1 4-5 Bedford Square is a Grade I listed building, which has been amended and updated over time. Notably, the property has undergone extensive refurbishment during the late 1980s.

8.2 During its life a significant number of steel beams have been added to the property in order to strengthen it, which has had an inevitable impact on the original floor. The floor boards have also all been replaced over time, with the majority being very recent additions to the property.

8.3 The property has a D1 (non-residential accommodation) use and was previously occupied by the Aga Khan University. It has now been purchased by the New York University and will continue to operate in this use class.

8.4 As with most properties, and particularly those within non-residential uses, there is a requirement to not only maintain but also to update and modernise the building. This ensures that the building fabric remains in good condition and that the building remains an attractive and viable option. The best way to protect buildings is to keep them in use.

8.5 Consent has already been secured for internal repairs and alterations to the property, including redecoration, new lighting and the reconfiguring of layouts. However, given that the entire building is currently empty the opportunity is being taken to review the whole building and its operational requirements. In particular this application seeks to deal with the issue of heat gain, a problem that affects many older buildings due to more intensive uses and the increased reliance on IT systems.

8.6 Therefore, it is proposed to provide an air conditioning system within the building. All aspects of this, from the choice of system through the laying of the pipe work and the location of internal units has been carefully considered in order to ensure that there is no adverse impact on the listed building.

8.7 A significant number of steel beams have been added to the property in order to strengthen it, which has had an

inevitable impact on the original floor. The floor boards have also all been replaced over time, with the majority being very recent additions to the property.

8.8 It is considered that the laying of the pipe work underneath the floor will have no impact on the '*special architectural or historic interest'* of the building for the following reasons:

- Floor boards can simply be lifted and replaced;
- Pipe work is very small and unobtrusive;
- Existing service runs and notches can be utilised (see photo);
- Copper pipes are very flexible so can be easily manipulated;
- Minimal impact on (non-original) floor boards where pipes exit;
- VRV risers all contained within existing service areas;
- There will be no visual impact of the pipes themselves;

8.9 Furthermore, the design and layout of the pipe work has been amended to address any concerns of the Local Authority following a site visit during pre-application discussions.

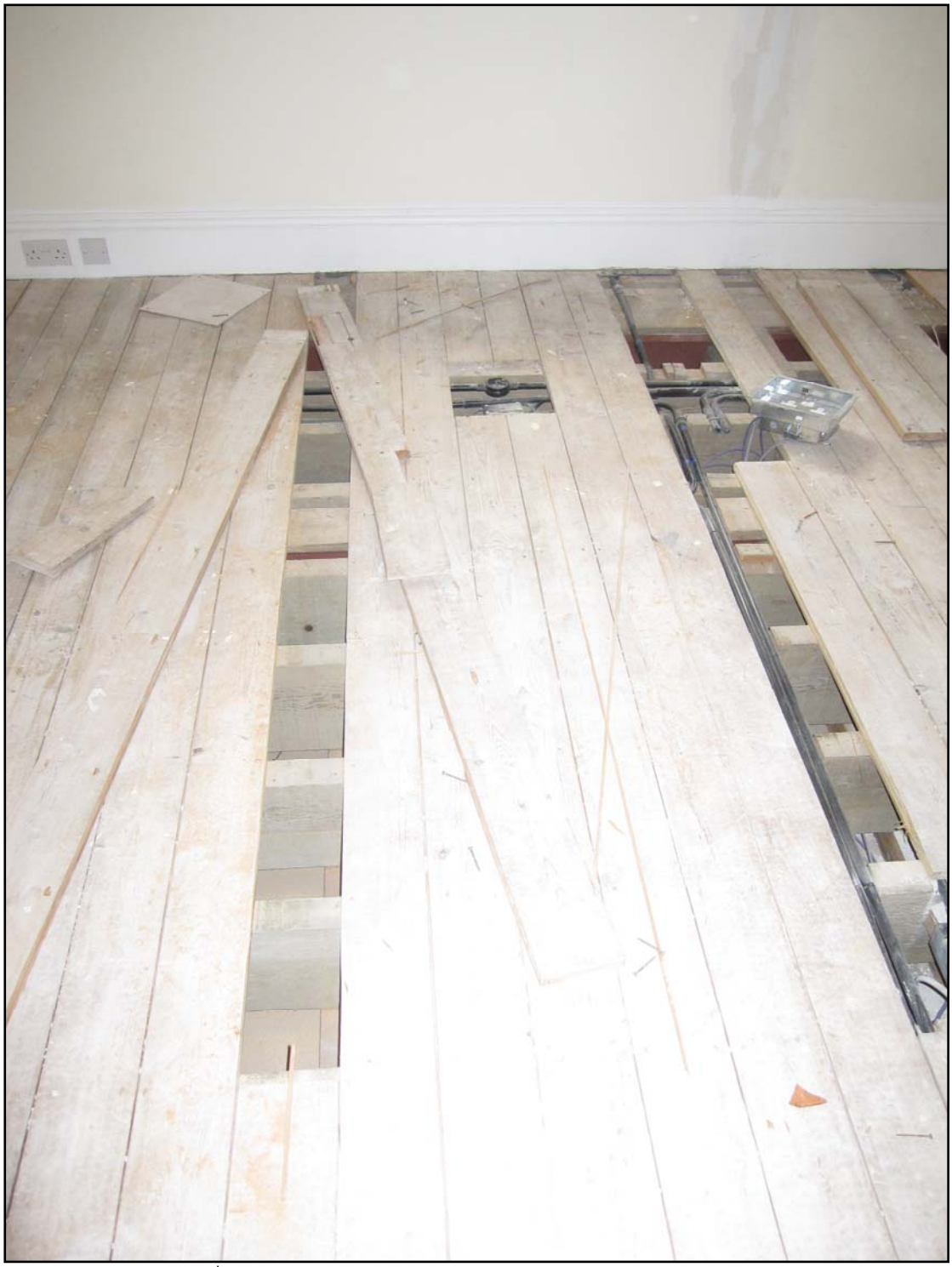
8.10 The internal units will be floor mounted and will be encased with decorative covers. As such, it is not considered that these will have any impact on the special architectural or historic interest of the building.

8.11 The external roof mounted condenser units will be located with an existing plant area on the roof of the adjacent building, No 6. Therefore, they will have no greater impact over the existing situation and will have no adverse impact either on the listed building or the conservation area in which it is situated.

8.12 A noise survey has been undertaken in order to assess the impact on the roof plant on the occupants of adjacent properties. This shows that there will be no adverse impact and that relevant planning conditions can be attached should this need to be controlled.

8.13 In conclusion, the proposal is in accordance with both national and local planning policy and the Local Planning Authority is therefore respectfully requested to approve the application.

APPENDIX 1 - Photographs



View of one of the 3rd floor rooms with floor boards lifted. The modern floor boards and joists are clearly visible. Modern services have also been provided, note the electrical floor box in the top right. This is typical within the building.

View of the lift shaft area, where one of the risers will be located. It can be seen that this area has been heavily altered in the past, including the erection of a modern block wall (right), new brick work and the insertion of modern services.

Modern data cabling running through existing notches in the joists. These existing notches can be largely re-used and old cable can also be removed.

View of existing plant on the roof of No 6 Bedford Square, situated within the existing valley.

Consideration was given to simply replacing the existing plant but it is visible from within No 5. Therefore, the location within the existing plant location is favoured.