

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>		<b>02/09/2014</b>	
		N/A		<b>Consultation Expiry Date:</b>		<b>15/08/2014</b>	
<b>Officer</b>				<b>Application Number(s)</b>			
Alex McDougall				1. 2014/4633/P 2. 2014/4634/L			
<b>Application Address</b>				<b>Drawing Numbers</b>			
42, 42A Bedford Square & 13 Bedford Avenue London WC1B				Refer to draft decision notices.			
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>				
<b>Proposals</b>							
<p>1. Conversion of existing building containing 6 self-contained dwellings (1 x 1 bed flat, 4 x 2 bed flats and 1 x 4 bed maisonette) for use as single family dwellinghouse (Class C3), erection of two storey infill extension at lower ground floor level to existing link between primary and mews buildings, erection of new flat roof to enclose existing third floor terrace including lift overrun, installation of balustrade around lantern at roof level, removal of existing roof lights and vents, installation of hatch to roof, installation of 3 x air condensers to middle of existing roof, alterations to external steps and alterations to fenestration.</p> <p>2. Works associated with conversion of existing building containing 6 self-contained dwellings (1 x 1 bed flat, 4 x 2 bed flats and 1 x 4 bed maisonette) for use as single family dwellinghouse (Class C3), including erection of two storey infill extension at lower ground floor level to existing link between primary and mews buildings, erection of new flat roof to enclose existing third floor terrace including lift overrun, installation of balustrade around lantern at roof level, removal of existing roof lights and vents, installation of hatch to roof, installation of 3 x air condensers to middle of existing roof, alterations to external steps, alterations to fenestration, installation of two internal lifts, and various internal works to replace and refurbish ceilings, partitions and mouldings to dwelling house.</p>							
<b>Recommendation(s):</b>		<p>1. Refuse Planning Permission 2. Grant Listed Building Consent</p>					
<b>Application Type:</b>		<p>1. Full Planning Permission 2. Listed Building Consent</p>					
<b>Conditions or Reasons for Refusal:</b>		Refer to Draft Decision Notices					
<b>Informatives:</b>							
<b>Consultations</b>							
<b>Adjoining Occupiers:</b>		No. notified	<b>9</b>	No. of responses No. electronic	<b>3</b> <b>3</b>	No. of objections	<b>3</b>
<b>Summary of consultation responses:</b>		<p>Site Notice: 23/07/14 – 13/08/14. Press Notice: 24/07/14 – 14/08/14.</p> <p>Objections were received from the following properties: 111, 112 &amp; 117 Bedford Court Mansions.</p> <p>The grounds of objection are summarised as follows:</p>					

	<ul style="list-style-type: none"> <li>• <i>Use</i> – Guest rooms could be used as short term holiday rental accommodation (<b>Officer Comment: See Section 2.1 for details</b>).</li> <li>• <i>Design</i> – Impact of roof plant and lift overrun on appearance of listed building (<b>Officer Comment: See Section 3.7 for details</b>).</li> <li>• <i>Amenity</i> – Unacceptable noise/vibration from roof plant and lift (<b>Officer Comment: See section 4.2 below for more details</b>).</li> <li>• <i>Waste</i> – The proposal does not include any formal waste storage areas (<b>Officer Comment: See Section 8 for details</b>).</li> </ul>
<b>Bloomsbury CAAC comments:</b>	No response received.
<b>Bloomsbury Association comments:</b>	<p>Objection, summarised as follows:</p> <ul style="list-style-type: none"> <li>• <i>Use</i> – Guest rooms could be used as short term holiday rental accommodation (<b>Officer Comment: See Section 2.1 for details</b>).</li> <li>• <i>Use</i> – The proposal is not financial viable (<b>Officer Comment: This is not a relevant planning consideration in this case</b>).</li> <li>• <i>Listed Building</i> – Extent of works requires structural statement (<b>Officer Comment: The proposed works are not considered to be of a scale to warrant a structural statement</b>).</li> <li>• <i>Listed Building</i> – The extent of works to the listed fabric is excessive and the Georgian Group should be consulted (<b>Officer Comment: The Georgian Group has been consulted and has not responded. See Section 3 for more information on design</b>).</li> <li>• <i>Listed Building</i> – The changes to the door to allow for disabled access would have a negative impact on the pattern of the terrace and the character of the area (<b>Officer Comment: See Section 3.10 for details</b>).</li> <li>• <i>Listed Building</i> – The secondary glazing to the Bedford Square frontage is not appropriate (<b>Officer Comment: There is no secondary glazing proposed to the Bedford Square frontage</b>).</li> <li>• <i>Amenity</i> – Roof plant noise/vibration (<b>Officer Comment: See Section 4.2 for details</b>).</li> <li>• <i>Design and Listed Building Impact</i> – Visual impact of roof plant (<b>Officer Comment: See Section 3.7 for details</b>).</li> <li>• <i>Design</i> – The louvered opening on the Bedford Avenue elevation is not appropriate (<b>Officer Comment: See Section 3.8 for details</b>).</li> <li>• <i>Waste</i> – Insufficient provision for storage (<b>Officer Comment: See Section 8 for details</b>).</li> <li>• <i>Amenity</i> – Construction Management Plan should be provided (<b>Officer Comment: Agreed. See Section 6.3 for details</b>).</li> </ul>
<b>English Heritage:</b>	Authorisation to determine application in line with local conservation advice.
<b>Georgian Group:</b>	No response.
<b>Site Description</b>	
The site is occupied by two buildings physically linked by a two storey brick/glazed walkway at basement floor level.	
Primary Historic Building (42 & 42A Bedford Square)	

The primary building is a 3 storey mid-terrace building with basement and loft on the southern side of Bedford Square. The building is part of a terrace of 15 buildings. The building was probably designed by Thomas Leverton or Robert Palmer for the Bedford Estate and dates from 1776-1781. The building is most recently in use as a 2 bedroom flat at basement level and a 6 bedroom maisonette at ground to third floor levels.

#### Secondary Mews Building (13 Bedford Avenue)

The mews building is a 2 storey mid-terrace building with basement and loft on the northern side of Bedford Avenue. The mews building was originally built in the late 19<sup>th</sup> century and later reconstructed during the later 20<sup>th</sup> century. The interiors of the mews building are plain and of no special interest. The mews building is more recently in use as 3 x 2 bedroom flats and 1 x 1 bedroom flat.

The buildings are Grade I listed. The site is located within the Bloomsbury Conservation Area. The area is characterised by residential properties and offices. The Bedford Square public open space is to the north of the site. The subject site has a Public Transport Accessibility Level (PTAL) of 6b (excellent).

### **Relevant History**

#### 42 Bedford Square (subject site)

CTP/N13/55/5/18356 - The provision of a rear lift shaft, alterations to the external elevations, the demolition of the existing mews building and the construction of a new building on four floors for office use, and the provision of a new bridge link between the main building and mews building. **Granted 22/08/1974.**

2006/5534/P & 2007/0134/L - Change of use and works of conversion from office (Class B1) to residential (1 x 1 Bed, 4 x 2 Bed and 1 x 4 Bed) self-contained flats (Class C3). **Granted subject to s106 agreement 16/10/2008.** Note: These works and use are considered to have been substantially implemented. The building is physically separated into 6 units which are all self-contained. The 6 units have all been registered separately for the purposes of Council Tax.

2013/3042/PRE - Works of alteration to building. Acceptable in principle, amendments suggested. **Issued 05/08/2013.**

2013/6444/P & 2013/6469/L - Erection of a two storey extension to the existing link structure, installation of a new dormer, balustrade and 3 condenser units to roof, installation of two internal lifts, creation of two plant rooms, and alterations to fenestration of dwelling house (Class C3). **Appeal against non-determination dismissed on grounds of invalidity of planning application, listed building consent withdrawn by Applicant.**

#### 6 Bedford Square (similar application nearby with regard to air conditioning plant)

2011/3803/P & 2011/3878/L - Installation of 4 air conditioning units with associated pipe work, walkway and access ladders at roof level of No. 6 Bedford Square. **Granted 15/12/2011.**

#### 12 Bedford Square (similar application nearby with regard to air conditioning plant)

2010/5036/P & 2010/5050/L - Installation of an air conditioning extraction unit at roof level to existing office building (Class B1). **Granted 15/11/2010.**

#### 32 Bedford Square (similar application nearby with regard to air conditioning plant)

2012/5450/P & 2012/5453/L - Alterations and associated works including, the addition of entrance platform lift and passenger lift to No.35, installation of roof level plant, erection of roof covering over rear yard of Nos. 34-36 at first floor level and creation of roof terrace over, erection of extensions at basement, ground and top floor level to Nos. 34-36 to allow new lift, services, reconfiguration of workshops at basement level and creation of gallery space at ground floor level all in connection with existing use as an educational institution (Class D1). **Granted at Members Briefing 10/12/2012.**

14 Templewood Avenue (similar application with regard to use)

2009/4648/P & 2009/4651/L - Conversion of 6 flats to a single dwelling house (Class C3). **Refused 11/01/2010.** Reason for refusal: The proposed change of use from six flats to a single dwelling, by reason of the resulting loss of five residential units, would undermine the strategic objective to increase the supply of housing as set out in the London Plan. In addition it would neither provide for a balanced mix of housing nor contribute to the supply of affordable housing units suitable for families in this location, for which there is demonstrable need in the Borough, contrary to policy H3 (Protection Existing Housing) of the London Borough of Camden Replacement Unitary Development Plan 2006.

### **Relevant policies**

#### **National Planning Policy Framework 2012**

National Planning Practice Guidance

#### **London Plan 2011**

London Housing SPG

#### **Camden LDF Core Strategy 2010**

CS1 Distribution of growth

CS3 Other highly accessible areas

CS5 Managing the impact of growth and development

CS6 Providing quality homes

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

CS16 Improving Camden's health and well-being

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

#### **Camden Development Policies 2010**

DP2 Making full use of Camden's capacity for housing

DP5 Homes of different sizes

DP6 Lifetime homes and wheelchair homes

DP16 The transport implications of development

DP17 Walking, cycling and public transport

DP18 Parking standards and limiting the availability of car parking

DP22 Promoting sustainable design and construction

DP24 Securing high quality design

DP25 Conserving Camden's heritage

DP26 Managing the impact of development on occupiers and neighbours

DP28 Noise and vibration

DP29 Improving access

#### **Camden Planning Guidance (updated 2013)**

CPG1 Design (Sections 1, 2, 3, 4, 5, 10 & 11)

CPG2 Housing (Sections 1, 4, 5 & 6)  
CPG3 Sustainability (Sections 1, 4, 7, 8 & 12)  
CPG6 Amenity (Sections 1, 4, 6, 7, 8, 9 & 11)  
CPG7 Transport (Sections 1, 5, 8, & 9)  
CPG8 Planning Obligations (Sections 1 & 10)

## **Fitzrovia Area Action Plan 2014**

### **Bloomsbury Conservation Area Appraisal and Management Strategy**

#### **Assessment**

##### 1. Detailed Description of Proposed Development

1.1. Use of both buildings on site as a nine bedroom single family dwellinghouse including self-contained ancillary caretaker flat and four self-contained ancillary guest suites.

1.2. The following internal alterations are proposed to the principle historic building:

- Various refurbishments throughout
- New lift from basement to fourth floor
- *Lower Ground Floor*
  - Internal subdivision
  - Conversion of 2 existing rooms to bathroom and wine store
  - Introduction of doorway to rear of outrigger
  - Water storage tanks installed in vaults
- *Ground Floor*
  - Internal subdivision
  - Removal of unsympathetic joinery in front room
  - Introduction of doorway to rear of outrigger
  - New WC fit-out
- *First Floor & Mezzanine*
  - Relocating existing historic timber staircase to accommodate lift
  - New bathroom and closet fit-out
- *Second Floor*
  - New staircase connecting to third floor
  - Relocating existing historic timber staircase
- *Third Floor*
  - Internal subdivision including en-suite bathrooms within three rooms
  - Convert external enclosed terrace to internal sitting room
  - New ceilings
  - New ceiling ladder and access to roof

1.3. The following internal alterations are proposed to the secondary mews building:

- New lift and stairs
- Internal subdivision
- Convert lower ground and ground floor windows at rear to doors
- New plant room at second floor level
- Ground floor entrance level modified to provide level access to Bedford Avenue

1.4. The following external works are proposed to both buildings:

- Two storey infill addition at lower ground floor level to existing link between primary building and mews building.
- Convert enclosed fourth floor terrace of primary building to sitting room by building new flat roof
- New balustrade at roof level around lantern
- Two new roof access hatches to primary building
- Remove existing roof lights
- Three additional air conditioning condensers to existing roof and lift overrun
- Existing sash window at mansard level of mews building integrated with timber louvers to bottom sash only for plant room ventilation.
- Existing windows to the rear of the mews building refurbished with secondary glazing.
- Lowering the door to the mews building to provide disabled access.

## 2. Principle of Development

### 2.1. *Proposed Use*

Some concern has been raised from adjoining and nearby properties as to the proposed use of the mews building. The mews would include five self-contained 'caretaker' or 'guest accommodation' suites with their own cooking facilities. The configuration proposed suggests that the primary function of the building would be as a single family dwellinghouse with several ancillary self-contained units which have access to the living spaces in the main building. If approval were recommended an informative would be included that the self-contained suites could not be let out separately from the dwelling.

### 2.2. *Conversion*

The proposal would result in the loss of 5 self-contained dwellings. LDF Policy DP2 resists the loss of more than 1 dwelling except in the following circumstances:

- *create large homes in a part of the borough with a relatively low proportion of large dwellings,*

Policy DP2 provides an exception if a proposal creates large homes in an area where there are a shortage of large family dwellings. The site is located within the ward of Bloomsbury which is identified as being an area with a shortfall. Policy DP5 states that a '3-bedroom or larger unit is considered a large home'. The existing site contains one large home (No. 42 Bedford Square has 6 bedrooms). The proposal would result in a single large home. As such the proposal is not creating any additional large family dwellings and thus this exception does not apply.

The existing building contains 4 x 2 bedroom apartments. Policy DP5 identifies that there is a very high demand for 2 bedroom market dwellings throughout the Borough. As such, even if the proposal were amended to create a new large unit out of the existing 2 bedroom units, it would be contrary to DP5.

- *enable sub-standard units to be enlarged to meet residential space standards, or*

Camden Planning Guidance 2 p6.7 states that existing homes must be 20% below current space standards for them to be considered sub-standard. Below is a comparison of the dwelling and bedroom sizes for the existing dwellings on site versus current standards:

**Table 1. Summary of existing dwelling/bedroom sizes on site.**

		Occupants (min)	Existing size (sqm)	London Plan Reqd (sqm)	Compliance	Camden CPG2 Reqd (sqm)	Compliance
42 Bedford Square (ground to third floor)	Overall	7	527.5	113	367%	93	467%
	Bedroom 1	2	51.0	11.5	343%	11	364%
	Bedroom 2	1	22.7	7.5	203%	6.5	249%
	Bedroom 3	1	18.3	7.5	144%	6.5	182%
	Bedroom 4	1	20.8	7.5	177%	6.5	220%
	Bedroom 5	1	14.4	7.5	92%	6.5	122%
	Bedroom 6	1	12.0	7.5	60%	6.5	85%
42A Bedford Square (lower ground floor)	Overall	3	134.0	61	120%	61	120%
	Bedroom 1	2	23.4	11.5	103%	11	113%
	Bedroom 2	1	20.8	7.5	177%	6.5	220%
Flat 1, 13 Bedford Ave (lower ground floor)	Overall	3	68.4	61	12%	61	12%
	Bedroom 1	2	15.9	11.5	38%	11	45%
	Bedroom 2	1	13.5	7.5	80%	6.5	108%
Flat 2, 13 Bedford Ave (ground floor)	Overall	3	57.8	61	-5%	61	-5%
	Bedroom 1	2	17.0	11.5	48%	11	55%
	Bedroom 2	1	12.8	7.5	71%	6.5	97%
Flat 3, 13 Bedford Ave (first floor)	Overall	3	55.8	61	-9%	61	-9%
	Bedroom 1	2	13.1	11.5	14%	11	19%
	Bedroom 2	1	11.5	7.5	53%	6.5	77%
Flat 4, 13 Bedford Ave (second floor)	Overall	2	41.0	50	-18%	48	-15%
	Bedroom 1	2	10.4	11.5	-10%	11	-5%
Overall Averages			Combined		98%		120%
			Dwellings		78%		95%
			Bedrooms		106%		130%
Averages not inc. main dwelling			Combined		48%		59%
			Dwellings		20%		21%
			Bedrooms		64%		81%

The existing units are considered to provide an adequate standard of accommodation for the following reasons

- The proposal does not include any dwellings, or rooms, 20% or more below space standards.
  - All of these units were found to provide an acceptable standard of accommodation during the assessment of planning application 2006/5534/P.
  - The units were inspected internally and were found to be in a good state of repair.
- *enable existing affordable homes to be adapted to provide the affordable dwelling sizes that are most needed.*

The existing building does not contain any affordable homes and as such this criterion does not apply.

The proposal does not satisfy any of the exemption criteria in DP2 and as such is a significant breach of planning policy.

The Applicant has submitted that the proposal overcomes the non-compliance with policy DP2 for the following reasons:

- *The conversion of three of the Bedford Square buildings from offices to single dwellings, including Nos. 40, 52 and 53, sets a precedent for the proposal.*

These permissions are not considered to be precedent for the proposal as the existing building is not offices and those proposals did not result in the loss of any existing dwellings.

- *Use of a Grade 1 listed building for its original purpose is a reason, on balance, to overcome the above policy non-compliance.*

With reference to paragraph 132 of the NPPF, the conservation of the asset is not dependant on the use of the entire site as one dwelling. The significance of the heritage asset does not change based on its use. The significance of the building is primarily, as stated by the Agent's heritage expert, in its external appearance as part of the Georgian terrace and square.

The Agent contends that it is historically more accurate to include the mews buildings as part of the main house. No evidence has been provided as to the original use of the mews building. The mews buildings on Bedford Avenue, c. late 19th century, are curtilage buildings with regard to the heritage listing. As such there is not 'Grade 1' listed value in their inclusion with the main buildings. The mews building does not include openings that would indicate that it was used for ancillary functions such as the storage of horses, carriages or motor vehicles. As such this is not considered to be sufficient reason, on balance, to overcome the policy compliance outlined above. Note that there is no objection to the primary building being used for its historic use as one dwelling; the amalgamation of the existing 42A and 42 Bedford Avenue dwellings is permitted within policy DP2 as it would only result in the loss of a single unit of residential accommodation.

- *Camden is already exceeding its housing target and that as such the loss of 5 dwellings should be of less concern.*

In a recent appeal decision (2191564) the Inspector concludes, in dismissing the appeal, that the objective of Camden's housing policy is to maximise housing, not to simply meet or exceed targets. As such this is not considered to be reason to approve the application.

- *All but one of the dwellings on the site are currently vacant and have been paying an empty property Council tax premium.*

The fact that the proposal would bring a vacant building back into use is not considered to be a positive element of the proposal as it is only vacant at the behest of the owner who is seeking the permission. Notwithstanding, at the time of the site visit, several of the dwellings were in use.

The justifications above are not considered, cumulatively, to overcome the significant non-compliance of the proposal with policy DP2. As such the proposal is considered to be contrary to policy, thus unacceptable in principle and is recommended for refusal.



The London Plan and Camden Policy CS1 seek to maximise the full use of a site and resist the inefficient use of land. The London Plan density test, table 3.2, states that the site should accommodate 4 – 13 units based on the site area of 312sqm, a central location, and a PTAL of 6b. As such, the existing number of dwellings on the site is very much in keeping with current policy. However, the loss of the number of homes is considered to be a more pressing issue, and ultimately contributes to more harm in this instance, than the proposed low density and therefore density is not considered to be sufficient itself to be included as a reason for refusal.

### *2.3. Alterations and additions*

Alterations and additions to listed buildings are considered to be acceptable in principle subject to a detailed assessment on the following grounds:

- a) Listed Building, Conservation Area and Design
- b) Residential Amenity
- c) Standard of Accommodation
- d) Transport, Traffic & Parking
- e) Sustainability
- f) Waste

## 3. Listed Building, Conservation Area and Design

### *3.1. Internal alterations*

The proposed internal alterations are considered to be of an acceptable design, and have an acceptable impact on the listed building, for the following reasons:

- a) The internal subdivision would be undertaken with lightweight materials that have acceptable impact on the historic fabric of the building. The level of subdivision, while excessive in some area, adequately maintains the historic sense of space within the primary rooms of the building.
- b) Some of the proposed works would remove non-original fabric and restore it to a more appropriate historic interpretation including the works to enclose the existing roof terrace, the removal of existing roof lights and the removal of unsympathetic joinery.
- c) The new openings in the rear outrigger at lower ground and ground floor level are to the rear of the building are not considered to materially detract from the historic character of the building due to the secondary nature of the façade and its lack of visibility from public areas of adjoining/nearby properties
- d) While it detracts slightly from the historic character of the building, where the proposed lift cuts through original staircases, these elements would be dismantled and reused within the building.
- e) The new staircases and proposed alterations to existing staircases would be appropriate detailed. A condition is recommended requiring that details be provided prior to construction.
- f) Details of service runs would be required prior to construction.
- g) The internal alterations to the mews building are considered to be acceptable as they would impact only non-original fabric.

### *3.2. Two storey infill extension*

The proposed two storey infill extension is considered to be of an acceptable design, and have an acceptable impact on the listed building, for the following reasons:

- a) The extension is wholly contained within the existing fabric of the building and the courtyard and as such would not add to the bulk of the proposal when viewed from any adjoining or nearby properties.
- b) The area is not visible from any public place.
- c) The proposal would generally transcribe the design of the existing side elevation of the existing link.
- d) The proposal appears to propose high quality materials which match the existing building. Notwithstanding, a condition is recommended ensuring appropriate materials are used.

### *3.3. Roof existing enclosed terrace*

The proposed roofing of the existing terrace is considered to be of an acceptable design, and have an acceptable impact on the listed building, as it would reinstate the original configuration and use of the room, remedying a previous unsympathetic alteration.

### *3.4. Balustrade to roof lantern*

The proposed balustrade to the roof lantern is considered to be of an acceptable design, and have an acceptable impact on the listed building as it would be of a lightweight design, would not be visible from any public areas or adjoining/nearby properties and would be easily reversible in the future.

### *3.5. Two new roof hatches*

The proposed roof hatches are considered to be of an acceptable design, and have an acceptable impact on the listed building as they would be flush with the roof face, of the same material as the roof, and not readily visible from any public place or adjoining properties.

### *3.6. Remove existing roof lights*

The proposed removal of the existing roof lights is considered to be of an acceptable design, and have an acceptable impact on the listed building, as it would reinstate the original configuration of the roof, remedying previous unsympathetic additions.

### *3.7. Additional roof condensers and lift overrun*

The proposed roof condensers and lift overrun are considered to be of an acceptable design, and have an acceptable impact on the listed building, for the following reasons:

- a) The roof condensers and lift overrun would not be readily visible from the public realm or adjoining/nearby properties as they would be hidden behind the existing pitched roof elements. While the upper stories of the Bedford Court Mansions building, to the rear of the site, would look down on the building, there are several street trees on Bedford Avenue which provide screening of the roof.
- b) Roof condensers and lift overruns are characteristic of roofs in the area. Several recent applications have been approved for similar plant (see history section above).
- c) The condensers are not permanent and do not result in irreversible damage to the listed building.
- d) The number of condensers is considered to be reasonable given the size of the building.

### *3.8. Modification to mews mansard window*

The proposed modification to the mews mansard window is considered to be of an acceptable

design, and have an acceptable impact on the listed building, for the following reasons:

- a) The proposal relates only to the lower half of one of the windows and as such would have a negligible impact on the overall facade.
- b) The mews building is considered to be of lesser historical significance.
- c) Due to the significant setback of the mansard the proposal would not be readily visible from the street.

### *3.9. Rear mews windows provided with secondary glazing*

The proposed modifications to the rear mews mansard windows is considered to be of an acceptable design, and have an acceptable impact on the listed building as the windows are not to the principle listed building and are to the rear of the mews only and as such would not be visible from any adjoining or nearby properties.

### *3.10. Lowering of door on Bedford Avenue*

While it would not normally be considered appropriate to lower the door on the rear elevation, as it would not be in keeping with the majority of such doors on other buildings in the terrace, as this elevation is of secondary importance to the character of the listed building, and would provide disabled access to an otherwise inaccessible building it is considered to be acceptable on balance. Notwithstanding, a condition is recommended requiring details of the proposed door.

For the reasons listed above the proposed development is considered to be consistent with LDF policies CS14, DP24 and DP25 of the London Borough of Camden's Local Development Framework as well as Camden Planning Guidance on Design.

### *3.11. Planning benefit of proposed works*

While the section above concludes that the proposal is acceptable it should be noted that the works are not considered to of such exceptional quality as to overcome the in principle objections to the proposal raised in section 2.1 above. Specifically, the proposal is not considered to go beyond the minimum acceptable requirements for the following reasons:

- a) Most of the refurbishments proposed would be required in any redevelopment of the site, irrespective of the use.
- b) The existing building is not at risk, and as such the proposal is not 'saving' a listed building.
- c) The public benefits from the improvements to the building are not considered to outweigh the public harm of the loss of 5 dwellings. The heritage listing refers primarily to the outside of the building, the element that the public benefit most from, which is currently in a good state of repair. The internal elements specifically described in the listing as important are already either in situ or have been removed. The proposal does not specifically reinstate any of the elements referred to in the listing of special architectural or historic interest.

## 4. Residential Amenity

### *4.1. Two storey infill extension*

The proposed two storey infill extension is considered to have an acceptable impact on the amenity of adjoining and nearby properties for the following reasons:

- a) Based on the height and orientation of the proposed windows the proposal would not offer

- any close or direct views into adjoining or nearby habitable windows or amenity spaces.
- b) No additional bulk outside of the external envelope of the existing building is proposed and as such there would be no unacceptable impact on solar access, outlook, and sense of enclosure or the like.
  - c) The use of the extension is not considered to add to noise or general disturbance.

#### *4.2. Plant and ventilation equipment*

The Applicant has provided an acoustic report demonstrating that the proposed plant would not have an unacceptable noise impact on adjoining or nearby properties. Notwithstanding, a standard condition of consent would be recommended with any consent to ensure that there is no unacceptable impact.

For the reasons listed above the proposal is considered to be in accordance with Development Policy DP26 of the London Borough of Camden's Local Development Framework.

#### 5. Standard of Accommodation

The proposal is considered to provide an adequate standard of accommodation for the following reasons:

- a) The proposed rooms generally comply with the minimum requirements in CPG2 and the London Housing SPG.
- b) All habitable rooms would have an acceptable outlook.
- c) The proposed lift would increase disabled access within the site, particularly to the rear, which would have level access to the street.

#### 6. Transport, Traffic & Car Parking

##### *6.1. Car Parking*

The site is located within the Holborn & Covent Garden Controlled Parking Zone (CPZ). The previous application for conversion of the site to 6 dwellings (2006/5534/P) was granted subject to a section 106 legal agreement that the development be car-free, restricting occupants from applying for permits to park in the CPZ. The proposal would thus result in an increase in the number of units eligible for on-street permits. Council data suggests that the local CPZ is exceeding capacity at a rate of 1.08 permits per space. Further permits would result in an increase in vehicles roaming for spaces. As such it is considered that the proposal should be designated as 'car-free' in keeping with the requirements of DP18. The Applicant has not entered into such an agreement and as such the proposal is considered to be unacceptable in this regard.

##### *6.2. Cycle Parking*

The subject site does not have any secure cycle parking and the proposed plans do not specifically identify the location or design of any new parking. The Applicant has suggested that the vaults to the front of the site could be used as cycle storage. The London Plan requires that there be at least 2 cycle parking spaces for such a dwelling. If approval were to be recommended a condition could be included requiring details of the location and design of such storage.

##### *6.3. Construction*

There is no on-site parking or servicing and as such construction vehicles would need to park/wait on the street. Based on the scale of the fit-out works and the location of the site in central London, the construction and servicing activities are likely to have a significant impact. Servicing and construction of the development should be planned and managed in order to minimise any impact on the adjoining road network and the significant public and visitor amenity provided by Bedford Square and the surrounding area. As such a Construction Management Plan (CMP) is considered to be required. Given that the construction would have impacts outside of the red-line boundary of the site it is considered that such a CMP should be secured via legal agreement. The Applicant has not entered into such an agreement and as such the proposal is considered to be unacceptable in this regard.

## 7. Sustainability

LDF Policy DP22 requires development to incorporate sustainable design and construction measures. As the proposal is for refurbishment of over 500sqm of residential floorspace, paragraph 4.3 of Camden Planning Guidance 3 requires that the proposal demonstrate that an EcoHomes rating of 'excellent' can be achieved. As the proposal is retrofitting an existing listed building and not adding significant additional floor space there are fewer options for the incorporation of sustainable design features. Notwithstanding, the applicant has not provided a pre-construction assessment to determine the levels achievable under the EcoHomes regime, nor have they agreed to enter into an agreement to secure these measures (including post-construction certification). As such the proposal is considered to be unacceptable in this regard.

## 8. Waste

While the proposal does not include any dedicated waste storage areas, as the proposal would result in a reduction in the number of units on the site the proposal is considered to result in a reduction in the amount of waste generated. Given the size of the building it is considered that there would be adequate internal area to store waste prior to collection.

## 9. Conclusion

### 9.1. *Application for full planning permission*

The proposal would result in several benefits, namely:

- a) reversal of some of the unsympathetic alterations to the Grade 1 listed building,
- b) increased disabled accessibility,
- c) use of part of the building for its original purpose, and
- d) provide a high standard of accommodation.

However, LDF policy CS6 indicates that the Council seeks to maximise the supply of homes and minimise their loss, with housing regarded as the priority land-use of the Camden Local Development Framework, and text supporting policy DP2 states "*...the expected delivery of additional homes from 2010/11 to 2024/25 falls significantly short of the projected growth in the number of households up to 2026. Any loss of residential floorspace that could potentially house an individual or household would worsen this shortfall, and will be therefore be resisted by the Council*" (p2.17). Therefore, on balance, the public benefits of the proposal are not considered to outweigh the harm caused by the loss of 5 residential units and as such the proposal is considered to be unacceptable and contrary to Council LDF Policies CS1 (Distribution of growth), CS6 (Providing quality homes) and policy DP2 (Making full use of Camden's capacity for housing).

### *9.2. Listed Building*

The proposal is considered to be acceptable subject to a condition requiring detailed design specifications of several elements of the proposal.

### 10. Recommendation

- 10.1. Refuse planning permission
- 10.2. Grant listed building consent