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Head of Planning
London Borough of Camden
5 Pancras Square
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21 July 2015

Dear Sirs,

25 Bedford Square - Application for Planning and Listed Building Consent

On behalf of our client, The Bedford Estates, (the 'Applicant'), we hereby submit an application for planning and listed building consent for the refurbishment of 25 Bedford Square.

The proposal seeks planning and listed building consent for the internal and external upgrade of the building, new comfort cooling throughout the building and associated rooftop plant. Further details are set out below and within the accompanying application documents. We are seeking planning and listed building consent for:

"Internal and external refurbishment works including: removal of basement kitchen fittings, new bathroom and WC fittings; repairs to electrical services and replacement lighting throughout the building; removal of demountable partitions; internal redecoration and repairs; repairs to roof; repairs and redecoration to external elevations and joinery; construction of a small rear extension between existing WC and lift shaft in rear courtyard; and new external plant including 4 x roof mounted condenser units and associated pipe-work connections, 1 x AC Unit in front pavement vault and 21 x new internal VRV units"

This letter sets out the details of the application, the background to the site, the description of the proposal and its justification against relevant planning policy.

Background

Bedford Estates is the largest private landowner in the Bloomsbury area and since the 17th century has owned, managed and developed many of the properties here. The Bedford Estates currently manages a varied portfolio of properties, from office and educational premises, hotel, restaurant and retail premises to residential properties and lock up garages. Bedford Estates own and manage the majority of properties in Bedford Square, including 25 Bedford Square to which this application relates.

As a long term landowner, the Estate prides itself in its dedication to the continuous improvement of the Bloomsbury area and commitment to refurbishing and upgrading properties to maintain and enhance their historic fabric while

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ensuring that they are fit for modern day purpose.

In line with this ethos, the current proposals seek to respectfully refurbish the building, whilst maintaining the existing use and building fabric. The refurbishment works which are the subject of this application will upgrade the existing facilities in order to provide improved, modernised and appropriate B1 office floorspace. The upgrade of the current facilities will ensure that a long term tenant can be secured and safeguard the continued use of the building.

Site Location & Description

Bedford Square, built as part of the Bedford estate in 1775, is a Georgian Square within the London Borough of Camden. The site is located within the Bloomsbury Conservation area. Numbers 12-27 Bedford Square are Grade I listed buildings. At the centre of the square is the private Bedford Square Garden. The garden is Grade II* listed and included in the English Heritage Register of Parks and Gardens of Special Historic Interest in Greater London.

The application site, 25 Bedford Square, consists of 3,764 sq ft of office floorspace over basement, ground, first and second floors with an attic room above. The property is one of 16 terrace houses in Bedford Square that form the northern side of the square.

The site is located roughly 0.3 miles from Goodge Street and Tottenham Court Road Underground Stations. To the east of the square lies the British Museum. Surrounding land uses are varied in line with its Central London location. The Fitzrovia Area Action Plan indicates that buildings surrounding the square are predominantly in office or educational use with occupiers including publishers, colleges and legal firms.

Planning History

The Site has a short planning history available online and this is summarised in the table below.

Ref.	Address	Description of Development	Decision & Date
HB424	25 Bedford Square	Internal alterations in basement and ground floor of 25 Bedford Square, W.C.1.	Listed Conditional 26-06-1972
HB511	24 & 25 Bedford Square	Formation of a door opening in ground floor party wall between 24 & 25 Bedford Square, WC1.	Listed Conditional 13-03-1973
HB874	24 & 25 Bedford Square	The removal of a wooden party wall opening at ground floor level and reinstating the wall in its original condition.	Listed Conditional 13-02-1975
8570161	24/25 Bedford Square	The formation of two doorway links in the rear additions at basement and ground floor levels as shown on drawing nos. 1 & 2.	Grant List.Build. or Cons.Area Consent 23-07-1985
8870076 / 8800180	21/25 Bedford Square	Demolition of rear extensions of 21-25 Bedford Square and of 12 Gower Mews (unlisted).Renovation of main buildings of 21-25 Bedford Square and rebuilding of	Grant List.Build. or Cons.Area Consent 07-07-1988

		12 Gower Mews and building of new rear extensions to 21 22 24 and 25 Bedford Square. Also some alterations to 11 Gower Mews	
9070052	21-25 Bedford Square & 12-13 Gower Mews	Formation of enlarged fire escape from No. 22 fire escape through 13 Gower Mews fire escape on roof of No. 23 tank rooms on roof of Nos. 23 and 25 and internal alterations to Nos. 21 22 and 23 as amendments to previous permission dated 28th October '88	Grant List.Build. or Cons.Area Consent 11-10-1990
9470140	25 Bedford Square	The installation of internal partitions at basement level. as shown on drawing number MACA no.1.	Grant List.Build. or Cons.Area Consent 24-06-1994
L9601511	25 Bedford Square	New internal partition at basement level, as shown on drawing MACA No. 2.	Grant L B Consent with Conditions 19-07-1996

The most significant consent is that granted in 1988 which granted consent for the demolition of the rear extensions along the terrace between 21-25 Bedford Square and the building of a new rear extension at these properties. In 1996 modern partitions were installed at basement level. The supporting documents for these applications are not available online and as such we have not reviewed in more detail.

Proposed Development

This application proposes both internal and external refurbishment and repair works to 25 Bedford Square. There shall be no change in B1 floorspace as a result of the proposals. A full description of works can be found in the Design and Access Statement (DAS) submitted as part of this application, in summary these include:

Internal Proposals

- Installation of comfort cooling to offices comprising a variable refrigerant volume (VRV) heat pump system;
- Removal of boiler and wall mounted radiators throughout property;
- Installation of 21 indoor variable refrigerant volume heat pump system units;
- Installation of plain, electric panel heaters in common parts and WCs;
- Installation of wall mounted fan coil unit in proposed communications room;
- Removal of existing kitchenette in the basement and the capping of services;
- Replacement of fixtures and fittings in all existing WC's;
- Testing and potential consequent repairs to electrical installation (potential re-wire);
- Replacement of all existing light fittings within the property;
- Installation of a wireless fire alarm system;
- Installation of data and telecoms points throughout the property;
- Replacement of the door access control system;
- Removal of demountable partitions;
- Replacement of all existing ironmongery;
- Replacement of all existing carpets within the property and replacement of WC floor tiles; and,
- General repairs and redecoration to walls, ceilings and floors.

External Proposals

- Installation of 4 x condensers on the roof of the main building and associated pipe work;
- Installation of 1x condenser in the pavement vault under the main entrance stairs;
- Install louvered face to the pavement vault;
- Repair and replacement of pitched roof;
- Repair works to external stonework, brickwork, coping stone, render and isolated pointing where required;
- Inspection and potential consequent repair work to lead work;
- Inspection and potential consequent repair work to external joinery; and,
- Construction of small extension between existing WC and lift motor room in rear courtyard.

Planning Policy Considerations

The development plan comprises the London Plan (2011) (with alterations, 2015), Camden Core Strategy (CS) (2010-2025) and the Camden Development Policies (DP) (2010). The following documents are considered relevant 'material considerations':

- The National Planning Policy Framework (2012);
- Fitzrovia Area Action Plan (FAAP) (2014);
- Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) (2011);
- Camden Draft Local Plan (2015); and,
- Camden Planning Guidance (CPG) 1 'Design' (2014).

Site Designations

- Grade I Listed Building;
- Central London Area;
- Bloomsbury Conservation Area;
- 'Sub Area 5' of BCAAMS; and,
- 'Character Area' of FAAP

The main planning considerations in relation to this application are 'heritage and conservation' and 'local amenity', specifically noise and visual impact. Relevant policy and corresponding responses are summarised in turn below.

Use

Core Strategy Policy CS8 'Promoting a successful and inclusive Camden economy' seeks to safeguard existing employment sites and premises in the borough. Development Management Policy DP13 'Employment premises and sites' sets out that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use.

The site is an existing office building (Use Class B1) and the proposed refurbishment will ensure that the building provides high quality office accommodation to meet the demand of modern occupiers in accordance with Policy CS8 and DP13.

Heritage and Conservation

The NPPF states at paragraph 131:

131. In determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Core Strategy Policy CS14 'Promoting High Quality Places and Conserving Our Heritage' promotes the protection and enhancement of heritage assets and settings, including listed buildings and conservation areas.

Development Management Policy DP25 'Conserving Camden's Heritage' seeks to preserve or enhance the boroughs listed buildings, the Council will:

- Prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- Only grant consent for a 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 it considers would cause harm to the setting of a listed building.

Draft Local Plan Policy D2 'Heritage' states that the council will preserve and enhance Camden's rich and diverse heritage assets and their settings, including listed buildings and conservation areas. It states that the Council will consider conservation area statements and appraisal and management plans when making their assessment. The policy also states that the Council will resist proposals that alter listed buildings where it is considered that this would cause harm to the special architectural and historic interest of the building.

The Fitzrovia Area Action Plan 'Urban Design Principles' states that proposals should positively respond the prevailing form of dwellings, in terms of scale and grain. Particularly in the case of listed buildings and of features that make a positive contribution to conservation areas.

The Bloomsbury Conservation Area Appraisal notes that the Bedford Square/Gower Street (Sub area 5) area is a virtually intact and exemplary piece of late 18th century town planning consisting of terraced housing built speculatively by a number of different buildings to a plan produced by the Bedford Estate.

The Square is considered to be one of the most significant and complete examples of Georgian Square in London, acknowledged by the Grade I listed status of all the townhouses fronting the square. Paragraph 5.64 notes:

"The terraces comprise three principal storeys with a basement and attic level. The frontages are of particular note because they were designed as a whole in a neo-classical style to give a sense of architectural unity and harmony to the square. The front facades are constructed from yellow stock brick with tuck pointing. Each of the four terraces has a central, stuccoed pediment as a centrepiece, with rusticated bases. The doorways have distinctive intermittent voussoirs of Coad stone (a type of artificial stone) and each key stone is decorated with a human face."

Response

A full detailed heritage assessment of the proposals is provided in the Heritage Statement which accompanies the application. In summary the proposals are relatively minor in nature and are not considered to affect the architectural or historic interest of the Grade I Listed building in accordance with Policy DP25. The proposals will ensure that the Listed Building is upgraded and repaired and new comfort cooling will ensure that the building has a long term use as a modern office space as required by the NPPF.

The internal repair works and refurbishments proposed are sympathetic to the architectural and historic interest of the building, as outlined in Policy CS14, Paragraph 14.12 'promoting high quality places and conserving our heritage', CPG1 Paragraph 3 'Design', Policy D2 of the Draft Local Plan 'Heritage' and DP25 'Conserving Camden's Heritage'.

Careful consideration has been given to the materials and fixtures used within the proposal, in order to closely match the existing and original features, whilst introducing more contemporary features where appropriate to increase the viability of office use within the premises.

Careful consideration has also been given to the processes involved in the refurbishment, such as the methodical numbering and reinstating of original floorboards, preventing harm to the special architectural and historic interest of the building as outlined in Policy D2 of the Draft Local Plan and Policy DP25.

External refurbishments to the property will be carried out with respect to the historic fabric of the building to ensure that the most significant parts of the building are carefully restored and continue to contribute to the character and appearance of the Conservation Area. Existing roof level lead work will be used where possible and reclaimed London stock bricks will be used in the repair works to elevations, in order to match the existing external materials and preserve the character of the building. This sympathetic approach to the selection of materials will also be used in the repairing of joinery and metal work.

A small extension is proposed at the rear of No. 25. This will facilitate improved access to the rear courtyard whilst also retaining the basement level WC. The small extension will be constructed from reclaimed London stock bricks in order to ensure that it matches the existing building and is in keeping with the external rear façade. It is considered that this minor extension will not harm the special interest of the building in accordance with DP25 and will provide a more efficient use of space and access to the rear courtyard.

New external plant is included as part of the proposals. It is recognised that this plant, if positioned poorly, could negatively impact on the heritage sensitivities of the surrounding area and the building itself. Therefore, careful consideration has been given to the location of the plant in order to protect the significance of the Grade I heritage asset. A number of locations were considered for the condenser units, with the location for 4 of these units on the roof deemed the most suitable given their lack of visibility and therefore minimal impact on the setting and views of the Bloomsbury Conservation Area and Listed Buildings.

The roof top plant is considered to be located in a discrete location between the pitched roof, the height of the units will not rise above the ridge line and the plant will not be visible from the public realm and most importantly from Bedford Square. The proposed approach to roof top plant has been based on recent approvals for roof top plant at nearby Grade I listed buildings 12 and 18 Bedford Square.

A further unit is proposed to be located within the pavement vaults, located beneath the pavement at the front of the building. Various locations for siting this unit have been considered to ensure that no harm is caused to the listed building. This was considered the most sensitive option because the units would not be visible from the street or be

able to be read in relation to the Grade I listed building. It is considered that this option has the least impact on the conservation area, neighbouring listed buildings and garden, and the Grade I listed building itself.

Overall, the Heritage Statement concludes that the proposals comply with the objectives of the NPPF.

Noise & Visual Amenity

Development Management Policy DP28 'Noise and Vibration' states that the Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed Camden's noise thresholds.

Development Management Policy DP26 'Managing the impact of development on occupiers and neighbours' also resists development that will cause harmful effects on the amenity of occupiers and nearby properties. This includes visual outlook, noise and vibration.

Response

The Camden noise thresholds for noise levels from plant and machinery (Table E of Policy DP28 'Noise and Vibration') states that noise levels should be a least 5dB below the lowest recorded background level. A survey of existing background noise levels has been carried out in order to set suitable noise criteria for the new plant to be set. Full details of which can be found in the Acoustic Report, submitted alongside this application.

The Acoustic report sets out that the nearest noise sensitive receptor is situated at the third level of Gower Mews Mansions, located 43m away from the proposed rooftop location for new plant, on Gower Mews. It concludes that the proposed plant conforms with Camden's DP28 requirements. Therefore it is considered that the new proposed roof top plant will not impact on local amenity.

Regarding visual amenity, the plant proposals will not be visible from street-level, with the plant sitting lower than the maximum pitch of the roof. This is clearly demonstrated in drawing 25-P07A 'proposed section A-A'. The surrounding buildings are of a similar scale and therefore it is unlikely that views from neighbouring windows will be impacted. Neighbouring windows that are above the location of the plant are not in residential use and therefore residential amenity shall not be impaired.

Application Submission Package

This application comprises the following documents:

- Covering Letter prepared by Deloitte
- Application Form and Certificates prepared by Deloitte;
- Design and Access Statement prepared by tft Consultants;
- Heritage Statement prepared by dlj Architects;
- Acoustic Report prepared by Clarke Saunders;
- Existing, proposed and demolition plans, sections and elevations prepared by tft Consultants (please refer to drawing schedule for further detail);
- Mechanical & Engineering drawings showing proposed servicing and plant prepared by TPS;
- Drawings demonstrating detail of plant prepared by mnp engineers; and,
- Planning application fee comprising £385 sent via post.

This application has been submitted via the planning portal and a cheque for the application fee will follow in the post.



Summary

This application proposes a sensitive set of refurbishment works to a Grade I listed building. The proposals have been developed to ensure that the areas of heritage significance are retained and enhanced while providing modern office accommodation in the heart of Camden.

If you would like to discuss any points raised in this letter please do not hesitate to contact me or my colleague Vicky Woollett (020 7303 4172),

Yours faithfully



Leonie Oliva
Deloitte LLP