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Matthias Gentet Head of Planning London Borough of Camden 5 Pancras Square London N1C 4AG

17 August 2016

Dear Matthias,

25 Bedford Square - Listed Building Consent Application for new Skylight

On behalf of our client, The Bedford Estates, (the 'Applicant'), we hereby submit a Listed Building Consent application for the removal of a roof top smoke vent and replacement with a new skylight within the rear flat roof of 25 Bedford Square.

The description of development is:

"Listed Building Consent for the removal of smoke vent and replacement with skylight on rear flat roof of 25 Bedford Square"

Background

Planning and Listed Building Consent (reference 2015/4185/P & 2015/4844/L) was granted on 5 and 11 November respectively for:

"Erection of a single storey extension within the rear courtyard. Installation of 4 x condenser units to roof level and associated pipe-work connections, widening of opening to lift motor room and addition of new louvered timber doors and addition of an extract fans to rear elevation at basement level, repairs and redecoration to roof level and external elevations all in connection with offices (Class B1a)".

Since then, work has commenced on the refurbishment of the building. During the refurbishment works, it became apparent that an existing and unsightly smoke vent on the flat roof to the rear of the property was redundant. It was also discovered that it was leaking and allowing water to penetrate into the building. The removal of this vent was not included in the original scope of works and therefore listed building consent is now being sought for its removal and replacement with a new skylight.

Site Location & Description

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.

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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 roof area to which the application relates, is located at the rear of the property. It is a non-original flat roof that sits beneath the pitch of the original building. Please refer to the roof plans for a better understanding of the context.

Proposed Development

This application proposes that the existing smoke vent is removed and replaced with a new skylight. The skylight will fit into the existing opening without the need for further demolition or amendments to the original fabric of the building. The glass skylight will protrude less than the existing smoke vent. A specification of the proposed skylight has been submitted as part of this application.

Planning Policy Considerations

The development plan comprises the London Plan (2011) (with alterations 2016), Camden Core Strategy (CS) (2010-2025) and the Camden Development Policies (DP) (2010). Relevant 'material considerations' include:

- · 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 (2016); and,
- Camden Planning Guidance (CPG) 1 'Design' (2015).

Site Designations

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

The key planning consideration in relation to this application is 'heritage and conservation'. The section below summarises the key policies and justifies the proposals against these.

Heritage and Conservation

The NPPF at paragraph 131 sets out the importance of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

Core Strategy Policy CS14 'Promoting High Quality Places and Conserving Our Heritage' and Development Management Policy DP25 'Conserving Camden's Heritage' promote the protection, preservation and enhancement of heritage assets and settings, including listed buildings and conservation areas.

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.

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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.

Response

The proposal is minor in nature and involves the replacement of an existing unsightly smoke vent with a new skylight. There will be no harm to the original fabric of the building as the opening will not be changed once the smoke vent has been removed. The skylight will be made bespoke to fit the existing opening. The internal finishes below the opening are modern and will not be impacted by the proposals.

The proposal will not visibly change the appearance of the listed building, nor will it be visible in views of the Bloomsbury Conservation Area as the skylight is low level. It will not be visible in the front or rear elevations nor from the street.

Overall, the proposed skylight is considered to be an improvement on the existing smoke vent, which is an unsightly and unoriginal piece of redundant plant equipment. The insertion of the skylight will in fact improve the appearance of the flat roof and the internal environment of the building. It will also ensure that the roof is water tight, where currently water is entering the fabric of the building and causing damage.

The specification of the proposed skylight has been included in the submission documents.

The proposals have also been subject to informal pre-application discussions with the planning officer and the conservation and design officer. During these discussions, the requirement for listed building consent was agreed. It was agreed that, due to the minor nature of the proposal, planning consent was not required. It was also noted that the proposal would contribute positively to the significance of the building and would be an improvement over the existing redundant smoke vent.

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 with Heritage Statement prepared by TFT Consultants; and,
- Existing and proposed plans and elevations prepared by TFT Consultants.

This application has been submitted via the planning portal.

Summary

This application proposes a minor alteration to the Grade I Listed building that will not harm the significance of the listed building nor the character of the Conservation Area. The proposal has been subject to informal pre-application discussion with both planning and conservation and design officers at Camden where it was agreed it was uncontentious.

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

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Yours sincerely,

Leonie Oliva Deloitte LLP