



GERALDEVE

Planning and Borough Development
London Borough of Camden
Judd Street
London
WC1H 9JE

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

FAO: Rob Tulloch

22 December 2016

Our ref: GAO/HBR/J7780

Your ref:

Dear Sir

**27 Montague Street, London, WC1B
Planning Application and Listed Building Consent Application**

We write on behalf of our client, the Bedford Estate, to submit planning and listed building consent applications in respect of 27 Montague Street, for the change of use of the existing premises from an hostel use (sui generis) to a residential use (Class C3) and associated internal works.

The Site

The site is located at the eastern side of Montague Street, towards the south, facing the British Museum. Montague Street links the south east corner of Russell Square with Great Russell Street. The site has a PTAL rating of 6b, the highest possible PTAL level.

The site is Grade II listed and is located within the Bloomsbury Conservation Area. The buildings were first listed on 28 February 1969. The listing description for the building is as follows:

“Terrace of 18 houses. c1803-6. By James Burton. Built by WE Allen, altered. Yellow stock bricks with stucco ground floors. Stucco sill band at 3rd floor level. Nos 15-17 and Nos 22 and 23 slightly projecting. Gateway to rear gardens (qv) between Nos 20 and 21. 4 storeys and basements. 3 windows each. Round-arched doorways with reeded door frames or sidelights, mostly 2-leaf doors; Nos 17, 20, 21, 22, 24, 25, 27, 28 and 29 with patterned fanlights. No.13, door replaced by window. No.19 with mosaic top doorstep with words "White Hall". Gauged brick flat arches to recessed sash windows, most with original glazing bars. Nos 18, 19 and 20 with glazing bars forming patterns of octagons, squares and ladders, to sides of panes, on ground and 1st floor. Nos 21 and 22 with patterned glazing bars to ground floor and No.26 to 1st floor. 1st floor windows with cast-iron balconies. Parapets. Rear elevations of Nos 25-29 with bowed bays. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.”

The site is also located within a Central London Area and an Archaeological Priority Area.

Background and Lawful Use

The original planning permission for the site is not available on Camden’s planning records as it was built prior to 1947. However, due to the layout, architectural construction and location within a

terrace of similar properties, it is highly likely that this building was originally constructed as a single family residential dwelling. This is supported by the Bloomsbury Conservation Area Appraisal (CAA) and Management Strategy (2011). The CAA states that the properties were likely to be constructed in the early 1800's.

The planning history relating to the site is fairly limited, and the only planning decision of any relevance is set out below.

On 24 April 1969, planning permission was refused (ref. 6370) for the change of use of basement, ground and first floors to office purposes with maisonettes on the upper two floors.

Whilst the planning history records for the site are inconclusive in helping to determine the lawful use of the premises, business rates records show that 27 Montague Street was valued as an hotel and premises in 2005 and 2010. There are some staff rooms contained within the hostel, however, these are likely to be ancillary to the use of the premises as an hostel.

At present the building is occupied as a backpacker's hostel (sui generis).

Pre-Application Enquiry

A pre-application enquiry was made by our client in 2011. Pre-application advice on the conversion of the existing building from hostel (sui generis) use to residential (Class C3) use was provided by London Borough of Camden officers in September 2011. The proposals were considered acceptable in principle, including the provision of link between the first floor bedroom and rear closet wing bathroom.

A further pre-application enquiry in relation to the conversion of the property from hostel use to residential use was submitted in August 2016. A formal response to the proposals was received on 16 December 2016. Generally officers considered that the proposals were acceptable in principle with additional information requested to be included within any Desktop Hotel Market Review submitted as part of the planning application. These comments have been taken on board and included within the application submission.

The pre-application advice noted that concern was raised with the link between the first floor bedroom and rear closet wing bathroom. Additional justification for these proposals has been included within the application submission.

Proposals

The Bedford Estate proposes converting the existing hostel (sui generis) at 27 Montague Street into three residential (Class C3) flats.

It is the applicant's intention to revert the premises to its original residential use, providing valuable housing accommodation within the Borough.

The proposed mix will be as follows:

Bedrooms Nos	Total Provision	Located
1 bedroom flat	x 1	First Floor
3 bedroom flat	x 2	Lower ground and ground floors; Second and third floors

Total Number of Flats	x 3	
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The basement and ground floor flat will have access to a rear yard, at basement level, as private amenity space, which also acts as a lightwell. The flat will also have access at ground floor level to a terrace on the flat roof of the rear basement extension. Whilst the proposals do not provide private amenity space for the upper floor flats, these two flats will have access to Bedford Square gardens.

The only external alterations proposed include refurbishment of the existing windows and provision of a new door. All external alterations are confined to the rear of the property. Any new services required for the building will terminate through the rear elevation.

Joinery, architraves, cornice and skirting details will be retained and restored where damaged. Missing features will be reinstated to match. Secondary glazing will be added to the lower ground and third floor bedroom windows. Secondary glazing is not required at other levels as the rooms fronting the street are living spaces rather than bedrooms.

Planning Considerations

The proposals have been considered against the Statutory Development Plan which comprises policies within the Consolidated London Plan (2015), Camden's Core Strategy (2010) and Camden's Development Policies (2010).

Loss of Hostel (Sui Generis)

Paragraph 8.12 of Camden's Development Policies outlines that hostels do not fall into a planning use class, so any material change to the use (including a change to the type of occupier) is classed as development.

Whilst hostels are classified as Sui Generis uses, paragraph 14.3 states that visitor accommodation includes hotels, bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other short stay accommodation that is intended for occupation for periods of less than 90 days.

Policy 4.5 of the London Plan recognises the importance of visitor accommodation. It also states that **"development should not result in the loss of strategically important hotel capacity"**.

Visitor accommodation is specifically dealt with by Policy DP14 of Camden's Development Policies. The Policy states that **"The Council will protect existing visitor accommodation in appropriate locations"**. Paragraph 14.6 states that the Council will protect existing visitor accommodation in appropriate locations which include Central London, growth areas and the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage.

The above policies are somewhat limited in providing clarity as to when the loss of visitor accommodation might be acceptable. As part of the submission of this application, we have provided a Desktop Hotel Market Review.

The submitted Market Review compares recent closures of small hostels against new hostel rooms, equating to an overall uplift in the supply of rooms. In the area to the south of the Borough there are approximately 12 hostels providing 624 rooms. Whilst there have been a closure of 452 rooms

within a 3 mile radius of this hostel, none of these were located within this southern part of the borough.

The Review identifies that by its very nature of letting primarily by the bed space; hostel accommodation creates intensive building use and therefore requires regular planned maintenance and capital expenditure in order for a building to be maintained properly. This is particularly pertinent in the case of historic building conversions that do not lend themselves well to high-density use due to age, design and building lay-out constraints.

The emergence of new brands such as Generator has effectively disrupted the competitive market by offering significantly larger-scale operations with a wider variety of ancillary guest facilities and higher security. This diversification in competition has provided a difficult challenge for smaller independent hostel operators who are unable to compete in terms of scale, facilities and brand power.

Compounding this increase in competition is the ongoing and rapid development of the budget hotel sector which is providing an indirect challenge in terms of price point.

27 Montague Street is located within the Central London Area, as defined by Camden's Core Strategy Proposals Map. However, it is considered that due to the constraints of the site and the small size of the premises, along with the market moving toward larger branded hostels and budget hotels, as well as overall supply within the market, the loss of visitor accommodation in this location will not materially affect the provision of visitor accommodation within this part of the borough.

Provision of Residential (Class C3) Use

Residential (Class C3) use is the priority use of the Development Plan across the Borough. Policy CS6 of Camden's Core Strategy seeks to maximise the supply of additional housing across the Borough, to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes.

Policy DP2 of Camden's Development Policies seeks to maximise the supply of additional homes in the Borough. It expects the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.

Camden's Development Policy DP5 states that the Council will seek a contribution to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. The Council will do this by ensuring that residential development meets the priorities set out in the Dwelling Size Priorities Table and by expecting a mix of large and small homes in residential developments. In considering the mix of dwelling sizes appropriate to a development, the Council will take account of the character of the development; the site and the area; any constraints on including homes of different sizes; and the economics and financial viability of the site.

Policy DP6 states that all housing developments should meet lifetime homes standards and 10% of homes should either meet wheelchair housing standards, or be easily adapted to meet them.

The proposals will result in the provision of three residential (Class C3) flats, the priority use of the Development Plan across the Borough. Accordingly, the residential land use is considered acceptable.

The proposed mix is proposed to be one 1 bedroom unit (lower priority) and two 3 bedroom units (medium priority). Due to the constraints of working within an existing listed building, there is limited

scope for an alternative mix. The proposals will provide a mix of dwelling sizes, as well as providing two family sized units with access to amenity space.

This development will not meet all requirements of lifetime homes and wheelchair housing standards, however, the proposals are for the conversion of refurbishment of an existing listed building, accordingly consideration should be given to the heritage constraints of the existing building.

In summary, the provision of housing, which is the priority land use within the Development Plan, is considered acceptable in accordance with Policies CS6 of Camden's Core Strategy and Development Policies DP2 and DP5.

Heritage and Conservation

Policy CS14 of Camden's Core Strategy requires development to preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Policy DP25 of Camden's Development Policies states that to preserve or enhance the borough's 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.

27 Montague Street is located within sub-area 6 of the Bloomsbury Conservation Area and part of a terrace that is listed Grade II.

The proposals seek to restore the historic significance of this Grade II listed building within the core of the Bloomsbury Conservation Area, and close proximity of the Grade I listed British Museum. The heritage works forming part of the proposals are considered to be of significant public benefit, substantially enhancing the architectural and historic interest of the building through the reinstatement of the original historic use and layout of the principal rooms.

Paragraph 131 of the NPPF states that **“in determining planning applications, local planning authorities should take account of the desirability of sustainable and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”**.

The existing building has gone through a series of changes. However, on the whole, these changes are considered to be reversible. It is considered that the intensity of the use at 27 Montague Street detracts from the appearance of the building. The associated subdivisions and hostel facilities such as basins that have been installed in all of the rooms do not enhance their architectural appearance. The proposals will result in the restoration of the general plan form of the building, where the historic layouts of the principal rooms as single spaces will be reinstated. This makes a significant enhancement to this historic building, helping to ensure the plan form is preserved for the future.

As set out above, the pre-application advice on the proposals stated that an opening in the wall between the central bedroom and rear closet wing is likely to harm the composition of, as well as involve the loss of historic fabric from, the main rear wall of the property. It is important to note that the breakthrough to the rear closet wing is required in order to make the scheme practically feasible. If no breakthrough to the rear closet wing is provided it is likely that the scheme would not come forward for residential and the provision of much needed residential units within the borough, would be lost.

It is important to note that as part of previous pre-application advice on almost identical proposals, the breakthrough to the rear closet wing was considered acceptable in principle by Camden's conservation officers. Furthermore, a breakthrough of this very nature was considered acceptable and approved as part of planning permission and listed building consent (refs. 2013/3881/P and 2013/3915/L respectively) at 24-25 Bloomsbury Square.

The proposals are not considered to harm the significance of the designated heritage asset and are considered to be of overall benefit to the appearance and historic interest of the building, as set out in the accompanying Heritage Assessment. In order to create this breakthrough, there will be a loss of 1.02m³ of historic fabric, which in relation to the size of the scheme as a whole, is considered insignificant. The restoration of this listed building, along with the removal of inappropriate subdivisions and the reinstatement of decorative details, is considered to be a significant public benefit in accordance with Paragraph 134 of the NPPF, ensuring the optimum viable use of the premises for the future.

Whilst none of the rooms, other than the original wine store, have significant architectural detailing, as part of the proposals, decorative features throughout the property, such as plaster work and joinery, will be restored where possible. Surface mounted services will also be removed to enhance the building's appearance. On the principal floors, the existing shutters will be restored in working order. This will enhance and preserve this historic building.

There are no changes proposed to the front of the building which retains its appearance and contribution to the terrace. The minor external alterations proposed, which are confined to the rear of the building, are not considered to harm the character or appearance of the Conservation Area. The new doorway from the ground floor kitchen to the terrace over bedroom 1 of the basement and ground floor flat, makes good use of external space in conjunction with a family sized unit and is not considered to harm on the significance of the listed building.

It is considered that overall there is no harm to the architectural or historic interest of the building and that as a result of the proposals the internal heritage features will be enhanced and preserved for the future.

It is therefore considered that the proposals comply with national, regional and local conservation policy and positively enhance the significance of the building through:

1. The restoration of the historic plans;
2. The repair and restoration of historic details; and
3. The creation of viable and sustainable residential use in accordance with the original building.

Accordingly, it is considered that the proposals are in direct accordance with the NPPF, and Policies CS14 and DP25 of Camden's planning policies.

Services and Sustainability

A Sustainability Statement has been submitted alongside these planning and listed building consent applications which outlines the approaches that will be taken to ensure that the development will meet all the sustainable requirements of Camden's planning policies.

Policy CS13 of Camden's Core Strategy relates to tackling climate change through promoting higher environmental standards. Policy DP22 of Camden's Development Policies requires developments to incorporate sustainable design and construction measures.

Policy DP23 required developments to reduce their water consumption and pressure on the combined sewer network.

As recommended by Camden's CPG 3, the energy hierarchy of Be Lean, Be Clean and Be Green, will be followed.

It is proposed that the building will have low energy lighting throughout. The rooms will generally be ventilated by means of opening windows, however, bathrooms and kitchens will be provided with mechanical ventilation. The replacement glazing will be single glazing to ground; first and second floor rooms and secondary glazing will be provided to all bedrooms fronting Montague Street. Green Tariff energy source will be selected, and boilers with min. NOx4 rating will be specified. New radiators will be provided, plus electric towel rails in the bathrooms. White goods with 'A' ratings will be specified.

All sanitary fittings will be specified to minimise water consumption, including aerator taps and shower heads, and efficient dual flush toilets.

Refuse and recycling facilities will be accommodated within the scheme.

In terms of thermal insulation, the roof void of the main house will be insulated. However, upgrading the walls and floor is not proposed, as to do so would detrimentally impact the character and appearance of the listed building.

Accordingly, it is considered that the proposals accord with the relevant London Plan policies and Camden policies CS13, DP22 and DP23, and should be considered acceptable.

Conclusion

The proposals would secure the provision of 3 residential units, which are a priority land use within the Borough. The proposals would result in appropriate mix of residential units, including the provision of two family housing units. Therefore, the proposals are considered to accord with planning policies at all levels.

Whilst visitor accommodation is protected in Central London locations, it is considered that the substantial heritage benefits of these proposals, alongside the hostel market information provided, and the opportunity to provide much needed residential accommodation in this part of the Borough, outweigh any policy conflict with Camden's Development Policy DP14.

Application Documents

We enclose the following documents submitted via Planning Portal:

- This Covering Letter;
- Application forms;
- Site Location Plan;
- CIL Forms;
- Fabric Removal, Existing and Proposed Drawings prepared by FT Architects;
- Heritage Assessment prepared by DLG Architects;
- Design and Access Statement prepared by FT Architects;
- Sustainability Statement prepared by FT Architects; and
- Desktop Hostel Market Review prepared by Gerald Eve LLP.

The application fee has been paid electronically and concurrently with the submission of the application on the planning portal.

We trust that you have all the information required to proceed with these applications.

Should you have any queries or require further information, please do not hesitate to contact Hannah Bryant of this office.

Yours faithfully



Gerald Eve LLP

goliver@geraldeve.com
Direct tel. +44 (0)20 7333 6315
Mobile +44 (0)7879408511