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FAO: Rob Tulloch

22 December 2016

Our ref: GAO/HBR/J7780

Your ref:

Dear Sir

23-24 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 23-24 Montague Street, for the change of use of the existing building from an hotel use (Class C1) 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; however, the planning decisions of relevance are set out below.

Two separate applications for planning permission were also refused on 24 April 1969 at both 23 (ref. 6366) and 24 Montague Street (ref. 6367) for the change of use of the basement, ground and first floors of the building to office with maisonettes on the upper two floors.

On 26 November 1976, listed building consent was granted (ref. HB1465) for the internal alterations to 23 and 24 Montague Street, involving the rearrangement of partitions and the installation of a new lift. It is likely that this was when the two properties were linked internally.

Whilst the planning history records for the site are largely inconclusive in helping to determine the lawful use of the premises, business rates records show that 23-24 Montague Street was valued as a hotel and premises in 2005 and 2010. Whilst we are aware that the Council tax records indicate some residential use at the premises, we understand that this relates to some of the staff rooms within the building that are ancillary to the existing hotel use.

At present the building is occupied as a hotel (Class C1).

Pre-Application Enquiry

A pre-application enquiry in relation to the proposals 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 and minor revisions to the internal arrangements as set out in the letter below.

The pre-application advice has been taken on board and incorporated into the design proposals.

Proposals

The Bedford Estate are seeking planning permission and listed building consent for the conversion of the existing hotel (Class C1) at 23-24 Montague Street into six 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 and reinstating a divide between the two properties to revert the properties to the original plan form.

The proposed mix is as follows:

23 Montague Street:

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	

24 Montague Street:

Bedrooms Nos	Total Provision	Located
1 bedroom flat	x 1	First Floor
2 bedroom flat	x 1	Basement and ground
3 bedroom flat	x 1	Second and third floors
Total Number of Flats	x 3	

The basement and ground floor flats of both 23 and 24 Montague Street will have access to rear amenity areas. These areas will also act as lightwells. The basement and ground floor flat at 24 Montague Street will also have access to amenity space at ground floor level to the rear of the building. Whilst the proposals do not provide private amenity space for the upper floor flats, the flats will be provided with access to Bedford Square gardens.

The only external alterations proposed are the replacement of the existing windows with timber sash windows (with high performance glazing) to match the neighbouring properties and reinstate a historic characteristic of these buildings. To the rear of the properties windows are replaced with doors at basement and ground floors to allow access to the amenity areas. It is proposed to provide a new fanlight to the front entrance door of 23 Montague Street to match neighbouring properties and reinstate a historic detail which is characteristic of this area. 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 provided to the lower ground and third floor bedrooms 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 (2016), Camden's Core Strategy (2010) and Camden's Development Policies (2010).

Loss of Hotel (Class C1) Use

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"**.

Paragraph 14.3 of Camden's Development Policies 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.

Visitor accommodation is 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 Review identifies that the ongoing development of budget hotels is effectively providing direct competition to existing bed and breakfast operations such as 23-24 Montague Street.

The marked level of growth in the sector is clearly illustrated in the volume of supply with the presence of 6,094 2-star/budget hotel rooms within a 1 mile radius of the property (as at 1 November 2016). There are also a number of pipeline developments due to enter the market in the future, estimated at 2,643 rooms (across 20 budget hotels). This represents 23% of the existing supply and will provide a considerable degree of additional competition to existing hotel businesses.

The poor quality of the existing accommodation, together with its lack of product uniformity, is another factor in this issue. As such, a degree of capital expenditure in relation to 23-24 Montague Street would arguably be required in the short to medium term in order to support future trading levels. This cost would likely increase further should a more comprehensive reconfiguration of the accommodation be deemed necessary.

23-24 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 level of supply of similar accommodation within close proximity of the building, compounded by a significant level of pipeline development, 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 within 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 six 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 across the two properties will be two 1 bedroom units (lower priority), one 2 bedroom unit (very high priority) and three 3 bedroom unit (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 three 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 buildings.

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.

23-24 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, which are set out in the accompanying Heritage Statement prepared by DLG Architects, 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 went through a series of changes in the 1970's/80's, including the installation of basins in all rooms, lift access to all floors and a lounge and dining space at basement and ground level. The alterations also included the formation of lateral corridors between the two properties and the subdivision of many of the larger and medium sized rooms. As a result of these works, the hierarchy of rooms, with larger spaces on the principal floors, has been lost and the lateral connections have destroyed the sense of individual buildings which is an essential part of the significance of a terrace. It is considered that the changes made and the intensity of the use at 23-24 Montague Street detracts from the character and appearance of the interior of the building.

The proposals seek the removal of the lateral connection between 23 and 24 Montague Street and will result in the restoration of the general plan form of the buildings, particularly in the basement, ground, first and third floors, where the historic layouts of the principal rooms as single spaces will be reinstated. This makes a significant enhancement to these historic buildings, helping to ensure the plan form is preserved for the future. The associated subdivisions and hotel facilities such as basins that have been instated in all of the rooms do not enhance their architectural appearance and will be removed.

It was originally proposed to create a breakthrough from the central bedrooms to the rear closet wing in order to provide en-suite bathroom facilities. The pre-application advice was that the loss of historic fabric to enable this connection was likely to be considered unacceptable. The proposals were revised and the rear closet wings are now proposed to be used as utility facilities. In order to provide bathroom facilities, bathrooms have been incorporated within the bedrooms themselves. The bathrooms have been designed so as not to extend to the full ceiling height, ensuring that the main ceiling remains in views and the principle room can be experienced. It is also important to note that the first floor is currently subdivided into hotel bedrooms and bathrooms so the proposed scheme is considered an improvement on the existing position. The pre-application advice also noted that the double door breakthrough at ground floor level should be removed and replaced with a single jib door. This has been incorporated into the design proposals.

Whilst none of the rooms have significant architectural detailing, as part of the proposals, decorative features throughout the buildings, such as plaster work and joinery, will be restored where possible. Surface mounted services will also be removed to enhance the buildings appearance. This will enhance and preserve these historic buildings.

The only changes proposed to the front of the buildings are the provision of a new fanlight to the front entrance door of 23 Montague Street and the replacement of the existing windows with timber sash windows, with high performance single glazing, to match the neighbouring properties and reinstate a historic characteristic of these buildings. The other minor external alterations proposed, which include the replacement of windows with doors to allow access to the amenity areas, are confined to the rear of the buildings, and are not considered to harm the character or appearance of the Conservation Area or the significance of this Grade II listed building.

It is considered that overall there is no harm to the architectural or historic interest of the buildings 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 buildings through:

1. The removal of lateral connections thus restoring the hierarchical significance of the rooms with the principal rooms being clearly preserved on the first and ground floors respectively;

2. The removal of inappropriate subdivisions to reinstate the significance of the individual rooms;
3. Retention and preserving of the main staircases;
4. The repair and restoration of historic details; and
5. The creation of viable and sustainable residential use in accordance with the original buildings and the objectives of the NPPF.

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 to basement and third floor rooms where bedrooms front 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 6 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 three 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 hotel market information provided, and the opportunity to provide much needed residential accommodation in this part of the Borough, mean that the proposals outweigh any policy conflict with Camden's Development Policy DP14.

Application Documents

We enclose the following documents submitted via the Planning Portal:

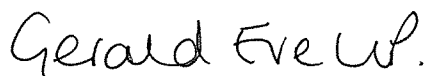
- This Covering Letter;
- Application Forms;
- Site Location Plan;
- CIL Forms;
- Fabric Removal, Existing and Proposed Drawings prepared by FT Architects;
- Heritage Assessment prepared by DLG Architects;
- Design and Access Statement prepared by FT Architects;
- Sustainability Statement prepared by FT Architects; and
- Desktop Hotel 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



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