



**12 ADELINE PLACE**  
LONDON WC1B 3AJ

**PROPOSAL:** Change of use on raised ground floor from office (Class B1a) to residential (Class C3) and replacement of steel windows to provide a 3-bed flat.

Application for planning permission reference: 2020/2658/P

30 September 2020

The Bloomsbury Association objects to this application and wishes to make the following comments.

### **Change of use**

1. When the applicant first sought a change of use of their ground and basement floors from office to residential in 1996 (P9602972 and PS9704875), the Bloomsbury Association supported the proposals. We considered that the fragile residential community in this part of Bloomsbury would benefit from more residential and less office use and that imbalance was reflected in planning policy. Since then, there has been a dramatic loss of workspace to residential conversions in Central London to the extent that, not only is there a shortage of affordable housing but also a shortage of affordable workspace. The housing market, predominantly driven by an overseas demand for 'buy to leave' or 'buy to let', became overheated and had to be regulated. Camden revised its local planning policy and loss of workspace is currently resisted through Local Plan policies E2a and E2b. This proposal would be counter to that policy. The proposal would also be counter to good practice that encourages mixed use in centres.
2. The proposal would result in a loss of employment. The statement made in Section 18 of the application form that there are no existing employees on the site and the proposed development does not decrease the number of employees is therefore misleading and incorrect.
3. However, Covid-19 has changed things again as everyone with a keyboard found they could work at home as effectively as in the office, including the Council. The prospect of being able to run a business without the cost of accommodation is appealing. In parallel, the rapid decline of the high street prompted government intervention through a change in the Use Classes Order to allow more flexibility of use - Use Class E. Now office space is within Use Class E and it can change to retail, financial and professional services, café or restaurant, sport and recreation, medical services and nursery, and vice versa as all are now in the same use class. This change became law on 1 September 2020 and local planning policy has yet to catch up.
4. The proposal appears to be driven by maximizing asset value rather than any tangible planning benefit. So, if the applicant's application for change of use to residential is refused, office space could change to any of the other uses in Use Class E, depending on the specifics of any proposed change of use needing planning permission. There is currently a limited market for office space; the accommodation and its means of access is poorly suited to many of the other activities in Use Class E and would fail to comply with policy C6(a) of the Local Plan. So there is an argument that residential may be most appropriate. This is particularly so when the host building is otherwise entirely residential and 12 Adeline Place was originally a duplex in residential use prior to becoming an office.
5. The proposed plan, drawing number AP\_PP101, described in the D&AS as a "single-dwelling lateral flat", appears from its layout to be more suited for use as a house of multiple occupation (Use Class C4), or for the AirBnB market, than as a single family dwellinghouse (Use Class C3). There also appears to be no provision for off-street refuse storage, which for the number of

occupants would be considerable. This is contrary to Local Plan policy CC5(d) and CPG:Design 8.6. Section 14 of the application form states that waste storage and collection will be coordinated in line with all other residential flats within the building, which may be correct for collection but not storage. Refuse is stored within internal or external communal parts of the building to which there is no access from 12 Adeline Place so the proposal needs to demonstrate how domestic refuse would otherwise be stored off the street.

### Window replacement

6. The application also refers to replacement of all the windows, including the original, elegant curved steel windows on the corner of Adeline Place and Bedford Avenue. Although a generic, prior permission has been obtained to replace metal windows in Bedford Court Mansions (2014/0033/P), the Bloomsbury Conservation Area Advisory Committee commented at the time: *"The windows, as proposed, and for the reasons stated above, fail to preserve or enhance the conservation area..."*.
7. Approved drawing 1120-01-02-07, referred to in the prior permission, shows details for a flat, not curved window. The corner windows that are the subject of this application are the only curved windows in the Mansions and they are original, pre-Crittall, dating from the late 1890s, some with curved, cast glass. They are in a prominent corner location and, because of this are highly visible from various angles at street level. One of the reasons why the BCAAC considered the replacement windows in the earlier proposal failed to preserve or enhance the conservation area was because the: *"Proposed 'stick on' transoms and mullions... are entirely inappropriate and, one would assume, have been proposed for cost saving measures. 'Stick on' mullions and transoms are particularly ghastly when viewed from an angle (as they all will be with such a tall building) and they should be resisted at all costs"*. Furthermore, it may not be possible to reproduce the curve of the frame in any aluminium, double-glazed replacement within the cost parameters envisaged, precluding the like-for-like replacement that the generic permission requires.
8. Bedford Court Mansions is not symmetrical but was developed as a single architectural composition and the two prominent corners with Adeline Place, to the west, and with Bloomsbury Street, to the east, are both expressed as 'turrets' of projecting bay windows. The corner bays are more or less identical and the whole corner needs to be considered for the height of the building, not just one floor. There are original curved windows frames to 12 and 12A Adeline Place, at raised ground and lower ground floors of this corner. They align with each other. Most of the curved glazing to the windows of number 12 has been replaced with flat glass in recent history but the original curved glass is evident below at 12A. This particular feature of the architectural expression of the building is important and should be retained to enhance the Bloomsbury Conservation Area, not destroyed.
9. The Association has always taken a firm position in ensuring that the asset value of Bloomsbury's heritage is not adversely affected by new development and expects the Council to ensure that the requirements of policy D2(e) are met and that it will not permit any further development that it considers would cause harm to the character and appearance of the Bloomsbury Conservation Area.
10. The original curved windows to 12 Adeline Place should be compared with where they have been replaced by inelegant, flat, double-glazed windows at 21 Bloomsbury Street, originally residential and part of Bedford Court Mansions but now also in office use – refer to images on page 4. The difference is evident. We therefore object to the



replacement of the original curved metal windows with contemporary flat windows and encourage the retention and refurbishment of the original window frames with curved glass and internal secondary glazing as necessary to enhance thermal and acoustic performance.

11. Likewise, we would encourage the retention of the original timber sash windows, which appear in sound condition, with existing single glazing replaced with slim double-glazed units rebated within the existing timber glazing bars, as in the windows above, facing Bedford Avenue.
12. Bedford Court Mansions is owned by Bedford Court Mansions Ltd, a company limited by guarantee and owned by its lessees. In other words, it is a resident-owned building. The D&AS incorrectly states that the Mansions is owned by Bedford Estates. Similarly, the Certificate of Ownership, in Section 25 of the application form, incorrectly states that nobody other than the applicant is the owner of any part of the land or building to which the application relates. This is also incorrect and, under the Town and Country Planning (Development Management Procedure) Order 2015, formal notice of the application should have been served on Bedford Court Mansions Ltd as freeholder. Without this, the application should not have been validated and, if determined on this basis, the decision may be legally unsound.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this does not. There are reasons to support the change of use but it is not clear-cut. A number of significant concerns have been expressed about the proposal that prompt us to object at this stage. Hence we look to the Council to refuse this application in its current form. It is suggested that the application be withdrawn and resubmitted as two separate applications so change of use may be considered separately from that for window replacement.

We would be grateful if you would let us know of any further modification to the application; the decision, if decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath

**On behalf of the Bloomsbury Association**

*Copies to:*

Councillor Rishi Madhani, London Borough of Camden  
Mark Chan, London Borough of Camden  
Chairman, Bedford Court Mansions Ltd  
Bloomsbury Conservation Area Advisory Committee  
Charlotte Street Association  
Chair, Bloomsbury Association



Original curved window frame, single-glazed with curved glass



## Reference images

Window replacement – page 2, item 10



12 Adeline Place – Original curved window frames, single-glazed



12 Bloomsbury Street – New flat window frames, double-glazed



12A Adeline Place – Original curved window frames, single-glazed with curved glass ▲ ►



12 Adeline Place – Original curved window frames, single-glazed