

DP4179/JHM/DTJ

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**FAO: ROSE TODD**

Dear Ms Todd,

**48 BEDFORD ROW, LONDON WC1R 4LR  
TOWN AND COUNTRY PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS)  
ACT 1990  
APPLICATION FOR LISTED BUILDING CONSENT**

On behalf of our client, SRG Holborn Ltd, we hereby submit this application for listed building consent for works to 48 Bedford Row, London.

**The Site**

The site is located within the London Borough of Camden, in the heart of Holborn, close to the City of London and the theatre district. The area is distinguished by the retail facilities of Hatton Gardens, Holborn Circus and Holborn Viaduct. The site comprises of a Georgian terraced building fronting Bedford Row within the urban block known as High Holborn Estate which is bound by Bedford Row, Brownlow Street, High Holborn and Hand Court. The site is located within the Bloomsbury Conservation Area ('CA') and buildings 46, 47, 47a Bedford Row are listed as a group with No. 48 listed individually as Grade II.

**Background**

Planning and listed building consent were granted by the London Borough of Camden under permission ref. 2020/0689/P and 2020/1335/L in July 2020 for the refurbishment and extension of the properties at 46-48 Bedford Row. These permissions included the retention and refurbishment of the existing stair at 48 Bedford Row.

Since the grant of planning permission, a contractor has been appointed and the applicant has been progressing with site investigative works to better understand the structural stability of the building(s). A condition assessment of the staircase and associated timbers at 48 Bedford Row was undertaken by BM Trada which confirmed that fungal decay consistent with dry rot and wet rot was present. Moisture



readings in the area of the stair taken by BM Trada showed that the damage was pre-existing, and this suggests that historic water ingress has undermined the timber structure. This report can be found within Appendix A of the submitted Design and Access Statement.

Following a detailed review with the structural engineers it is now realised that the existing stair poses a significant health and safety risk to operatives on site and to the building itself.

This has been discussed with the Council and it has been agreed that due to the health and safety risks associated with the structural instability of the stair, that its removal should take place as a matter of urgency. Prior to these works taking place a survey of the existing stair was undertaken and shared with the Council to ensure that the replacement stair would be like for like.

The design team have been developing the designs for the replacement stair ensuring that it matches that of the existing as closely as possible whilst meeting the loading and building regulation requirements. This has resulted in the inclusion of metal structural elements which, where possible, are hidden within the stair structure. The enclosed Design and Access Statement and drawings provide further detail on the proposed design.

The applicant team have been in discussion with the Council who has provided helpful input into the proposed designs. This application for listed building consent has been prepared to formalise the demolition of the existing stair and its replacement.

### **The Proposed Development**

This application seeks listed building consent for:

*"Application for the demolition and replacement of the existing staircase, and associated works, at 48 Bedford Row."*

### **Planning Policy Consideration**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan (2021), and the London Borough of Camden Local Plan (2017). In addition, further guidance is provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').

The Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') is the legislative basis for decision making when determining planning applications that relate to the historic environment.

Section 66 of the Act imposes a duty on local planning authorities when considering applications which affect a listed building or its setting to have 'special regard' to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses.



Paragraph 197 of the NPF states that in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

When considering the impact of a Proposed Development on the significance of a designated heritage asset, paragraph 199 states that ‘...great weight should be given to the asset’s conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm to its significance’.

Paragraph 200 of the NPPF states ‘Any harm to or loss of the significance of a designated heritage asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings... should be exceptional.

Paragraph 202 of the NPPF states ‘Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use.

In relation to the consideration of impacts on non-designated heritage assets, paragraph 203 states “the effect of an application on the significance of a non-designated heritage asset should be taken in to account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balance judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Local Plan Policy D1 seeks to secure high quality design within development proposals whilst Policy D2 outlines that in order to maintain the character of Camden’s Conservation Areas the Council will not permit development that causes harm to the character and appearance of that conservation area.

The proposals seeks to replace the existing stair at 48 Bedford Row with a new stair which (1) is a like for like replacement of the existing in respect of its location, positioning, form, function and materiality, (2) meet the loading requirements of the building and its users and (3) meets building control requirements.

To do this, the stair requires steel interventions which have been incorporated in a manner which will be hidden, where possible, within the wooden exterior. The proposals have been designed to mirror that of the existing stair through the previously issued survey drawings.

Unfortunately, the building will not pass building control if it does not incorporate the structural elements required. Therefore, the alternative is that without the inclusion of these interventions the building will not be able to be refurbished or occupied.

The design team have undertaken a great deal of work to incorporate the steel structural elements to meet the necessary building control requirements. These interventions have been incorporated in a manner which is sympathetic to the listed nature of the building to ensure, where possible, the proposed stair is a visual replica of the existing.



However, following investigations by the design team it was discovered that due to the lack of newel posts from the first half landing and the small size of the timber spindles that they would not meet the lowest required horizontal loading. Therefore, it is proposed that the spindles are constructed from square steel bars and painted to match the original timber spindles. They will be dimensionally identical to the original balusters with the same painted finish.

We understand that the existing stair in isolation is not considered to be of high significance, but it is instead the positioning and layout which holds greater significance to its listing. Therefore, the proposals seek to replicate the stair in both its location, positioning, form, materiality and through the re-use of materials, such as the hard wood handrail. We believe that the proposals are the most appropriate and sympathetic solution to address the building control requirements, ensuring that the building can be used and enjoyed in the future.

The proposals developed by Buckley Gray Yeoman provide an appropriate balance between preservation and change. Any minor harm to this heritage asset arising from the changes proposed is balanced by the benefits of bringing this building back into active, safe use for years to come.

The approach taken meets the requirements and aspirations of the NPPF, and Policy D1 and D2 of the London Borough of Camden Local Plan. It is in accordance with paragraph 197 of the NPPF, which states that in determining planning applications, local 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 and the desirability of new development making a positive contribution to local character and distinctiveness.

The proposals are in accordance with LBC Local Plan Policy D2 Heritage, in that they protect and enhance the borough's heritage assets, their setting and their significance as key elements of developing the sense of place of the borough, and do not, as a whole, result in an adverse impact on the character, fabric or identity of heritage assets or their settings. The proposals are appropriate in terms of design, scale, form, detailing and materials in the local context and are carefully conceived to enhance or better reveal the significance of the assets and their setting.

Overall, the proposals would result in the sensitive heritage focussed refurbishment and enhancement of the heritage asset in accordance with the policy context. The proposals will enable the preservation of the Grade II listed building whilst bringing it back into a viable use.

## **The Submission**

This submission comprises the following documents:

- **Planning application forms and certificates** prepared by DP9 Ltd;
- **CIL additional information form** prepared by DP9 Ltd;
- **Planning application drawings** (existing, demolition and proposed) prepared by Buckley Gray Yeoman;



- **Design and Access Statement** (including heritage and structural statement) prepared by Buckley Gray Yeoman; and
- **Staircase Record Report** prepared by Buckley Gray Yeoman.

This application has been submitted via the planning portal (ref. PP-10147158).

We trust the enclosed documentation meets your requirements. Please contact Dean Jordan or Mike Moon of this office should you require any further clarification regarding the above.

Yours sincerely,

**DP9 Ltd**  
Enc.