



GERALDEVE

London Borough of Camden  
Planning and Borough Development  
5 Pancras Square  
London  
N1C 4AG

72 Welbeck Street, London W1G 0AY  
Tel. +44 (0)20 7493 3338  
[geraldev.com](http://geraldev.com)

**Our ref: GAO/JOR/BWA/U0018666**

**Your ref: PP- 11036071**

6 April 2022

Dear Sir/Madam

**33 Bedford Row**

**Town and Country Planning (As Amended) Act 1990**

**Planning (Listed Buildings and Conservation Areas) Act 1990**

**Application for Full Planning Permission and Listed Building Consent**

We write on behalf of our client, The Harper Trust, to submit an application for full planning permission and listed building consent for works at 33 Bedford Row, London, WC1R 4JH.

The proposals comprise minor external alterations of plant equipment. Full planning permission and listed building consent is sought for:

**“Installation of plant equipment at first floor rear roof and associated internal works.”**

**Existing Building**

The site is situated on the junction of Bedford Row and Princeton Street, facing onto Bedford Row. The property comprises 5 stories and is currently in Use Class E.

The site is a Grade II listed building and is located within the Bloomsbury Conservation Area. The listing description states:

*4 terraced houses. c1691. Built by Nicholas Barbon, refronted early/mid C18. No.33: brown brick with stucco ground floor and stone band at 1st floor level, tiled roofs. Stone band between floors. 3 storeys, attic and basement. 3 windows with 8-window return to Princeton Street, some blind. Architraved door surround with console-bracketed hood, fanlight and panelled door. Gauged red brick flat arches to flush framed sash windows. Later parapet with stone cornice and dormers behind. No.34: multi-coloured stock brick. Bracketed cornice at 3rd floor. 4 storeys and basement. 3 windows. Architraved door surround, recessed panelled door with fanlight. Architraved sash windows. 1st floor casements with ornate blind boxes and stone balcony with wrought-iron railings. Parapet. No.35: multi-coloured stock brick under a slate roof. Stucco band at 1st floor level and sill band. 3 storeys and basement. 3 windows. Stone architraved doorcase with console bracketed hood, radial fanlight and panelled door. Gauged red brick flat arches to recessed sash windows, those at 1st floor with cast-iron balconies. Cornice below later parapet. No.36: red brick under a tile roof. Stucco band at 1st and 2nd floor level. 3 storeys and basement. 3 windows. Architraved door case with console-bracketed*

*hood, radial fanlight and panelled door. Gauged red brick flat arches to slightly recessed sash windows with exposed boxing. Stucco keystones. Cornice below later parapet. INTERIORS: not inspected but No.36 noted to retain lead cistern dated 1691. SUBSIDIARY FEATURES: attached cast-iron railings with torch flambe finials to areas.*

The majority of properties along Bedford Row are Grade II listed, and there are a number of listed buildings within the surrounding area. These include:

- 1-6 Raymond Buildings- Grade II listed;
- Gray's Inn Square Buildings- Grade II\* listed;
- The Chapel, Gray's Inn Square- Grade II listed;
- The Hall, Gray's Inn Square- Grade I listed;
- 45, 46 and 50 Red Lion Street- Grade II; and
- Conway Hall, Grade II listed.

The surrounding area is characterised by commercial and residential units.

The site is well placed for access to public transport, being located close to Chancery Lane and Holborn Underground Stations and Farringdon Rail Station. The site has a Public Transport Accessibility Level of 6b meaning excellent accessibility.

### **Planning History**

A desk-based review of the planning history at 33 Bedford Row has revealed a number of historical applications relating to the site. No applications are considered relevant to this proposal.

### **Proposals**

The works proposed under this application include the installation of replacement plant equipment on the first-floor rear flat roof. The recent sale of the 34 Bedford Row property, which was in the same ownership of 33 Bedford Row, necessitates the separation of the mechanical ventilation equipment which is currently linked and serves both properties at basement level.

The plant equipment is required to provide ventilation for the kitchen, the WCs and the new office located to the rear side at basement level. Whilst the front part of the basement is accessible through a small yard on Bedford Row, the rear rooms can only be accessed through the internal staircase. The ceiling level of the basement is barely above the street level allowing only a few air bricks providing natural ventilation to the corridor. The height restrictions do not allow for rooms in the basement to be naturally ventilated therefore a mechanical ventilation system has to be introduced as well as an active cooling system.

The proposals involve the removal of the existing outdated plant equipment and installation of new air conditioning and ventilation plant on the first-floor flat roof. The proposed plant equipment comprises of two units, both smaller in size compared to the existing unit. The units are proposed to be set back from the railing at approximately the same position as the existing service. Due to the reduced size of the units, they will hardly be seen from the street level.

The associated internal works for the plant equipment are minimal as existing routes will be used. Current services running at the ceiling level of the basement will be fully stripped out as indicated on the demolition drawings. Existing openings through the historic fabric will be utilised where possible and new proposed routes will be redirected to avoid any areas of historic fabric.

The proposals are set out in more detail within the submitted Heritage Statement which has been prepared by MEB Design Ltd, however in summary, the following works are proposed:

- Removal of existing plant on the first-floor rear flat roof;
- Installation of air conditioning plant on the first-floor rear flat roof;
- Installation of ventilation plant of the first-floor rear flat roof;
- Internal works to existing ductwork;
- Replacement of existing VRP fan cell unit at Basement level; and
- Replacement of existing air-brick to match existing.

The proposals will have no material changes to the fabric of the building, as the plant equipment is being replaced, located in the same area and the existing routes will be reused for the required pipework.

### **Planning Policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the local planning authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The National Planning Policy Framework (2021), the London Plan (2021) and the Camden Local Plan (2017).

Camden adopted a suite of updated Camden Planning Guidance documents on 25 January 2021, of which the 'Energy Efficiency and Adaptation' is deemed a material consideration in the assessment of this application.

### **Planning Assessment**

#### Heritage and Design

Local Plan Policy D1 seeks to ensure development respects local context and character, preserves or enhances the historic environment and heritage assets, is of sustainable and durable construction and is adaptable to different activities and land uses and comprises details and materials that are of high quality and complement the local character.

Local Plan Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.

Paragraph 7.13 of the Local Plan states that building services equipment, such as air cooling, heating, ventilation and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position.

The proposed plant equipment replaces existing external plant. The proposed plant will match the size of the existing plant and is discretely located on the flat roof at first floor level adjacent to the external facade. The equipment will be set back to ensure that it is only partially visible from street level as per the existing

situation and the colour / materials will further ensure that it is not easily detected behind the railings which face the street. The proposals involve no material change on the fabric of the building as existing routes will be reused for the required pipework. It is therefore considered that the proposals do not cause any harm to the significance of the listed building or the Conservation Area and comply fully with Local Plan Policy in respect of design and heritage.

### Amenity

Through Local Plan Policy A4, Camden seek to ensure that noise and vibration is controlled and managed.

A Noise Report prepared by RBA Acoustics assesses the prevailing noise conditions at the site and presents the results. The Puma Supply Fan is to be placed within an acoustic enclosure with an open grille for air intake.

The report confirms that the noise emissions from the proposed plant equipment is within the criteria required by Policy A4 and as such the plant installations should be considered acceptable in terms of noise.

### Energy

Camden's Local Plan states that proposals for new plant must demonstrate how the London Plans cooling hierarchy (Policy SI 4) has been considered and demonstrates a clear need for the chosen option.

Camden's cooling hierarchy is:

- Minimise internal heat generation through energy efficient design;
- Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;
- Manage the heat within the building through exposed internal thermal mass and high ceilings;
- Passive ventilation;
- Mechanical ventilation; and
- Active cooling.

The proposals are for replacement plant equipment on a listed building. The ceiling level of the basement is barely above the street level allowing only a few air bricks providing natural ventilation to the corridor. The height restrictions do not allow for rooms in the basement to be naturally ventilated therefore a mechanical ventilation system has to be introduced as well as an active cooling system.

Given the building is an existing building and is listed it is considered that the mechanical ventilation proposals are the most appropriate strategy for the building and as such the proposals comply with Policy A4 of Camden's Local Plan and Policy SI 4 of the London Plan.

### **Conclusion**

The proposals will not alter the elements of the building which provides its special quality and will not affect the significance of heritage assets. The proposed works will have minimal impact to the site and the conservation area whilst also providing necessary ventilation and cooling to the building.

In support of this application, we enclose the following supporting documents;

- Completed Application Form, prepared by Gerald Eve LLP;

- Additional CIL Information Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by MEB Design Ltd;
- Existing and Proposed Plans, prepared by MEB Design Ltd;
- Existing and Proposed Elevations, prepared by MEB Design Ltd;
- Heritage Statement, prepared by MEB Design Ltd; and
- Noise Report, prepared by RBA Acoustics.

The requisite fee of £462 plus a £32.20 (including VAT) Planning Portal fee for the planning application has been paid online via the Planning Portal. The accompanying listed building consent application does not require a fee.

We trust that we have provided all of the material required for the purposes of validation and therefore await confirmation of this application shortly. Please let us know if a site visit is required and we will be more than happy to organise this.

In the meantime should you have any queries or require further information, please do not hesitate to Contact Joanne Rams (07551173158) or Bethan Warwick (07385409543) of this office.

Yours faithfully



**Gerald Eve LLP**

JRams@geraldev.com

Direct Tel. +44 207 333 6372

Mobile. +44 755 117 3158