

21 Bloomsbury Street Town Planning Statement

On behalf of: Capital 38 Limited

6 October 2022

Contents	Page
1 Introduction	3
2 Site and Surroundings	6
3 Planning History	8
4 Pre-application Consultation and Community Engagement	10
5 Proposed Development	14
6 Planning Policy Framework	16
7 Assessment – Land Use	19
8 Assessment – Design	28
9 Assessment – Heritage	32
10 Assessment – Sustainability	37
11 Assessment – Transport, Waste, Servicing and Deliveries	41
12 Assessment – Amenity	46
13 Summary and Conclusions	49

1 Introduction

- 1.1 This planning statement has been prepared by Gerald Eve LLP on behalf of Capital 38 Limited (the 'Applicant') in support of an application for full planning permission for the proposed development at 21 Bloomsbury Street, London, WC1B 3HF ('the Site').
- 1.2 The proposals comprise a comprehensive internal refurbishment with modest extensions at roof level and to the rear to provide high-quality office accommodation. Alterations to primary facades on Bloomsbury Street and Bedford Avenue have been minimised and are centred on improving accessibility at ground floor level and also the replacement of the fenestration like-for-like.
- 1.3 At roof level, the creation of a second useable mansard level within the existing pitched roof structure to Bloomsbury Street and Bedford Avenue will provide additional office accommodation and plant equipment at sixth floor. Above this, the existing ad hoc collection of visible items on the roof (lightwell casing, plant, cat ladder and balustrading) will be removed. This will be replaced by a functioning seventh floor level comprising of a roof pavilion, garden and sedum roof, in addition to accommodating the lift overrun and a consolidated and screened plant enclosure.
- 1.4 The rear of the existing building will be extended and a series of stepped terraces are proposed to provide further amenity space for occupiers. Internally the floorplates will be substantially improved, with the focus of the refurbishment being accessibility, sustainability and end-of-journey experience.
- 1.5 The proposed development will increase the office floorspace at the site by 719sqm, deliver significantly improved office floorspace, with outdoor amenity space and end of journey facilities befitting of this prominent Central London location.
- 1.6 Accordingly, full planning permission is sought for:

“Alterations to existing building comprising: rear extension with new pocket terraces at second to sixth floors; creation of office space within existing sixth floor roof with new dormers and plant enclosure; new roof terrace and pavilion with sedum roof;

replacement of windows; alterations to entrances; replacement of faux chimney stacks and associated works.”

1.7 This Town Planning Statement is one of several documents, which are submitted in support of the application. The following supporting documents are submitted:

- Completed Planning Application Form, prepared by Gerald Eve;
- Completed Community Infrastructure Levy Form, prepared by Gerald Eve;
- Applicant’s Covering Letter, prepared by Gerald Eve;
- Existing, demolition and proposed drawings, prepared by Stiff + Trevillion;
- Design and Access Statement, prepared by Stiff + Trevillion;
- Acoustic Assessment, prepared by Sweco;
- BREEAM Pre-assessment, prepared by Sweco;
- Construction Management Plan (Draft), prepared by Momentum;
- Daylight and Sunlight Assessment, prepared by Lumina;
- Delivery and Servicing Management Plan, prepared by Momentum;
- Energy & Sustainability Statement, prepared by Sweco;
- Heritage, Townscape and Visual Impact Assessment, prepared by KM Heritage;
- Statement of Community Involvement, prepared by Kanda;
- Transport Statement, prepared by Momentum; and
- Travel Plan (Draft), prepared by Momentum.

1.8 This Statement provides a comprehensive review of national, strategic and local planning policy and guidance relevant to the proposals. It assesses the degree to which the proposals accord with the policies of the Statutory Development Plan and takes other material considerations into account, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory tests.

1.9 The adopted Development Plan for the Site comprises the London Plan (published in March 2021), Camden’s Local Plan (adopted in July 2017) and Camden’s Site Allocations Plan (adopted in September 2013). The National Planning Policy Framework (the “NPPF”), revised in July 2021 is a material consideration, along with relevant supplementary planning policy guidance.

- 1.10 LB Camden’s planning and conservation officers were engaged for pre-application discussions regarding the principles of the proposed development. Full details of this are included at Section 4 of this Statement.
- 1.11 For the reasons sets out in this Planning Statement, the proposals are considered to be in accordance with relevant planning policy and guidance. The proposed development would provide a sensitively designed, high-quality upgrade to the existing building and deliver enhanced office floorspace in the heart of Bloomsbury.
- 1.12 The proposals have been fully assessed in relation to planning policy, guidance and the statutory tests, and for the reasons set out within this Statement, are considered to meet the objectives of development policies.

2 Site and Surroundings

The Site

- 2.1 No. 21 Bloomsbury Street occupies the corner plot of Bloomsbury Street and Bedford Avenue. The building is in commercial use and is set over basement, ground, and five upper floors. The two primary facades, which face onto Bloomsbury Street and Bedford Avenue, are of high-quality Victorian architecture, featuring primarily red brick punctuated with stone detailing. These facades are the only remaining features of the original building. The building is not listed, although it is identified as a 'positive' building in the Bloomsbury Conservation Area Appraisal. As is evident from a desk-based search of the Council's planning records, the building has been subject to minor incremental works in recent years in addition to substantial redevelopment behind retained façades during the 1990s. That development retained the facades in excellent condition with minimal loss of original architectural fabric.
- 2.2 At the centre of 21 Bloomsbury Square is a large internal atrium with a glazed roof. The atrium is entirely internal, providing limited natural light to the surrounding office floorplates. There is a single, shallow terrace within the atrium at second floor level, which is currently used for storage.
- 2.3 On 31 March 2022 a Certificate of Lawfulness application (ref. 2022/0189/P) was approved, which confirmed that proposed works to partially infill the existing internal atrium did not constitute development on the basis that the works would be internal and would not affect the external appearance of the building. A comprehensive review of the Site's planning history is detailed in Section 3 of this Statement.

The Surrounding Area

- 2.4 The Site's context is historic and while 21 Bloomsbury Street is not listed, there are a number of well-preserved listed buildings in the immediate vicinity. To the north is 33 and 35 Bedford Avenue and Nos. 40-54 Bedford Square which are listed at Grade I. The significance of these buildings is primarily to the front which faces on to Bedford Square, itself a Grade II* listed Park and Garden, however the terrace is considered to form a very important and complete example of 18th Century town planning. On the west side of Bedford Square, Nos. 1-10

comprise a Grade I listed terrace dated between 1775 and 1786. To the west of the site, 24-60 Bloomsbury Street comprises a listed terrace (Grade II) of 19 houses dating from 1766. To the rear of Bloomsbury Street is the British Museum (Grade I). Additionally, to the rear of the site is Grade II* listed 99 Great Russell Street and Grade II listed 98 and 100-109 Great Russell Street.

- 2.5 The site and the surrounding buildings are a mix of commercial and residential use. The Kenilworth Hotel lies directly south of the site with residents to the west. To the north-west is the École Jeannine Manuel UK. The site is designated as within the Central London Area. The site is also in the Bloomsbury Conservation Area and the London Suburbs Archaeological Priority Area (Tier 2).

3 Planning History

3.1 An examination of LB Camden's online planning register has been undertaken and the Site's recent relevant planning history is summarised in this Section.

3.2 An application for listed building consent (ref. 86/70168) was made in 1986 for:

“The demolition of the existing office building”.

3.3 This application proposed to demolish the building behind retained facades on Bloomsbury Street and Bedford Avenue. To note, it is unclear why listed building consent (and not conservation area consent) was required as the building was (and remains) unlisted. The listed building application was refused on the grounds that the need to demolish the building had not been substantiated and therefore the proposed development was contrary to the Council's policy at the time which resisted the loss or replacement of any buildings which still had a useful life unless an appreciable benefit to the local community would result. This application accompanied a separate planning application (ref. 86/00777) for:

“The works of redevelopment behind the retained street facades to provide office accommodation as illustrated in drawing numbers 6348/PL01B PL02D PL03A PL04B PL05B PL06B PL07C PL08B 09A & 10B and site plan revised by letters dated 11th June 1986 and 11th July 1986. Appeal received against the Council's failure to issue their decision within an appropriate period”.

3.4 The decision notice relating to the application for listed building consent, dated 16 September 1986, states that due to the refusal of the application for listed building consent, the Council would not proceed to determine the planning application. Accordingly, the decision notice relating to the planning application states that the decision would be deferred indefinitely following the Council's decision to refuse consent to demolish the building.

3.5 An appeal was submitted against the decision of the Council to refuse listed building consent for the demolition of a non-listed building within a conservation area, and for non-determination of the planning application. The Appeal Decision, dated 23 January 1987, sets out that the Council had no objection to the grant of planning permission, subject to conditions and that their reason not to determine the application was based solely on their

own practice preference in cases of conflicting listed building consent and planning permission decisions. The Inspector considered this decision to be contrary to Local Government Planning and Land Act 1980 and concluded that planning permission should be granted. Separately, the Inspector considered that the proposed development would preserve the character of the conservation area and overturned the decision thereby granting listed building consent.

3.6 In September 1987 an application (ref. 8703557) was made for:

“Variations to planning permission for the redevelopment for office use (behind the retained facades to Bloomsbury Street and Bedford Avenue) granted by the Secretary of State for the Environment on 23rd January 1987 comprising alterations to elevations relocation of goods and firemans lift lowering of lift shaft and raising of atrium roof. As shown in drawings numbered 6348/PL/ 09 10 11 12 13 and 18 and 6348/SK/PL/ 14 and 15.”

3.7 The proposed amendments were minor in nature and included improvement to the retained façade in the form of the reinstatement of windows to the basement area of an appropriate style in place of unsympathetic historic alterations. The application was granted permission on 12 November 1987.

3.8 Since, there have been a small number of applications relating to air conditioning and condenser units. In 2014 planning permission (ref. 2014/2288/P) was granted for:

“Erection of a single storey rear extension at second floor level and use of existing roof top space as terrace”.

3.9 On 31 March 2022 a Certificate of Lawfulness application (ref. 2022/0189/P) was approved, which confirmed that proposed works to partially infill the existing internal atrium did not constitute development on the basis that the works would be internal and would not affect the external appearance of the building.

4 Pre-application Consultation and Community Engagement

- 4.1 Paragraph 39-46 of the NPPF highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties.
- 4.2 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.
- 4.3 The proposed development has been subject to discussions with the LB Camden planning and conservation officers in advance of formal submission.
- 4.4 An initial virtual pre-application meeting was held on 4 April 2022, which presented the proposed development. The scheme was largely as per this planning application and proposed internal and external alterations, including the creation of a roof terrace, and the provision of improved office accommodation. The existing building was to be retained and refurbished. The atrium was to be partially infilled as per certificate ref. 2022/0189/P (N.B. as confirmed by the same certificate this infill does not require planning permission and it therefore does not form part of this planning application). Additional office accommodation would be provided within the existing pitched roof at sixth floor level and alterations to the façade and building access points formed part of the general proposed upgrades.
- 4.5 The pre-application meeting was positive and officers provided feedback in respect of land use and design. Officers noted the importance of understanding the relationships between 21 Bloomsbury Street and the surrounding buildings, particularly having regard to the terraces proposed as part of the rear extension and the terrace at seventh floor level. A site visit was therefore held at the request of Officers on 21 April 2022.
- 4.6 A formal written response was received on 15 May 2022.
- 4.7 The written response confirmed that the proposed development, which would involve alterations and extensions to an improve an existing office building, is acceptable in principle. In land use terms, LB Camden's response set out that a full exploration of options for delivery

- of on-site residential accommodation should be undertaken to inform the planning application in accordance with Camden Local Plan Policy H2 and on the basis that the development would comprise in excess of 200sqm additional commercial floorspace.
- 4.8 The response also stated that if the certificate application (which was then under determination) confirmed that the atrium infill was permitted development, then the infill floorspace would not be subject to a housing contribution.
- 4.9 Having regard to design and conservation, Officers stated that the proposed extensions were potentially acceptable in terms of the character and appearance of the building and conservation area. Officers noted that the scale and design of the dormer windows should be reviewed, ensuring they were more sympathetic to the architecture of the building. Officers acknowledged the benefits of alterations to the entrance points of the building and stated that new doors should be dark painted timber, entrance steps should be stone, and brickwork and railing should be proposed to match existing.
- 4.10 The written response highlights that the retention of the Bloomsbury Street and Bedford Avenue facades is a positive. The simplification of the building's roof form is supported, as is the replacement of the existing faux chimney stacks. The Council accepted that the existing poor, modern, imitation window casements presented an opportunity to deliver both architectural and thermal improvements. It was noted that the building demanded historically and architecturally appropriate windows on the facades that front the public realm. Regarding the rear elevation, the response considered that a modern taken on 19th century fenestration may prove to be a more appropriate treatment.
- 4.11 In respect of amenity, Officers confirmed that the proposals would require support from a Daylight and Sunlight Assessment, but noted that, due to the separation between the proposed extension and Bedford Court Mansions, the extension was unlikely to be unduly overbearing or oppressive for occupiers of these properties. A Noise Impact Assessment demonstrating the proposed plant would cause no undue impact on neighbouring occupiers is also required.
- 4.12 Transport and specifically the potential impact of construction traffic was considered during the meeting and within the formal written response, and a Construction Management Plan

(CMP), alongside a CMP implementation and a Construction Impact Bond would be secured by s.106 Agreement. In addition, Officers noted that a Delivery and Servicing Management Plan and a Travel Plan would both be secured by s.106 Agreement. Both documents have been submitted in draft in support of this planning application.

- 4.13 The Applicant made clear during the pre-application meetings that sustainability is a key driver of the proposed works and that the project team had high ambitions in terms of ESG output, with a particular focus on embodied carbon and operational output. Officers confirmed that BREEAM Excellent is required for all non-residential development of 500sqm or more floor space. Officers noted that an Energy Statement should be submitted which details carbon emissions reductions in accordance with the Energy Hierarchy would be required and renewable energy technologies to secure a minimum 20% increase in carbon reductions would be required.
- 4.14 Following a period of design development, a follow pre-application meeting was held with officers on 11 August 2022. A subsequent meeting was also held on 22 August 2022 with LB Camden's Transport Officer to discuss the proposed delivery and servicing strategy and construction traffic management.
- 4.15 A second formal written response was received on 21 September 2022, which provides further advice in relation to the provision of on-site housing, in addition to reponse on design development, transport and amenity issues.
- 4.16 Regarding the provision of residential use, the written response accepted that, due to physical constraints, on-site residential use would fail to meet necessary standards and regulations and would have a detrimental impact on the function of the office space. The written response stated, **"it is agreed that the provision of on-site housing to meet the policy H2 requirements would not be satisfactory in terms of residential standards/regulation and design implications on the building."**
- 4.17 The response calculated the off-site payment-in-lieu sum based on the pre-application 2 floorspace figures and excluding the additional floorspace proposed within the certificate ref:

2022/0189/P. Officers stated that any viability appraisal submitted would need to be ratified by LB Camden's financial consultants (BPS).

- 4.18 Regarding design and heritage, the response confirms that the reorganisation and consolidation at roof level would be welcomed and the additional windows were acceptable subject to integration of window size hierarchy. Feedback was also provided in respect of the proposed works to the access points, which should seek to correspond to the prevailing Queen Anne revival style of the existing building and the adjacent Bedford Mansions.

5 Proposed Development

- 5.1 This planning statement should be read in conjunction with the Design and Access Statement prepared by Stiff + Trevillion, which provides a full description of the proposals and design evolution, in addition to the planning drawings, and other technical assessment documents submitted with this application.
- 5.2 This application seeks full planning permission for:

“Alterations to existing building comprising: rear extension with new pocket terraces at second to sixth floors; creation of office space within existing sixth floor roof with new dormers and plant enclosure; new roof terrace and pavilion with sedum roof; replacement of windows; alterations to entrances; replacement of faux chimney stacks and associated works.”

	Existing	Proposed Extension	Total Proposed
Class E (GIA) sqm	9,841	719	10,650

- 5.3 As set out in paragraph 3.9 above, a Certificate of Lawfulness (ref. 2022/0189/P) was granted on 31 March 2022, which confirmed that proposed works to partially infill the existing internal atrium (531 sq.m.) did not constitute development. For the avoidance of doubt, that floorspace is not included in the floorspace figures set out above.
- 5.4 Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and whole life carbon reduction but in its operational phase in terms of health and wellbeing. The Proposed Development would be highly sustainable with central plant equipment at lower ground level and the roof level to service the building. The Energy Strategy for the building proposes an all-electric solution with no gas or CHP boilers to minimise greenhouse gas emissions, in addition to passive measures to reduce heat loss and naturally ventilate the building.

- 5.5 The proposed development would provide substantially improved internal office accommodation at all existing floor levels, in addition to providing additional office floorspace by way of an extension at sixth floor level that will sit behind the existing pitched roofscape and incorporate an acoustically screened central plant area. The roof will be transformed into a high-quality internal and external amenity space. To the rear, the existing south elevation will be replaced with a new elevation which features stepped terraces, providing on-floor amenity to occupiers. Opportunities for greening will be maximised on terraces to the rear and at sixth and seventh floor level. Further works at seventh floor and roof level will simplify, align and remove clutter from the roof line.
- 5.6 The primary elevations of the building will be retained. Windows will be sensitively replaced to improve thermal performance and the relationship with surrounding heritage assets. A second set of dormers will be introduced on the Bloomsbury Street elevation providing natural light to the new sixth floor office accommodation. It is also proposed to replace the existing faux chimney stacks.
- 5.7 At ground floor level, legibility and accessibility will be improved via enhancement to the primary entrance on Bloomsbury Street, which has been designed with reference to traditional detailing. An improved accessible entrance will also be provided immediately south to the existing primary entrance. The entrance on Bedford Avenue will also undergo enhancements, which correspond to the improved end-of-journey facilities which are proposed at basement level, which are substantially greater than the existing provision. Cycle parking, showers and other commuter facilities will be provided as well as provision for cargo bikes as part of the servicing strategy.

6 Planning Policy Framework

- 6.1 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.
- 6.2 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan (2021)
 - The Camden Local Plan (2017)
- 6.3 The National Planning Policy Framework (“NPPF”) and National Planning Practice Guidance (“NPPG”) are both material considerations.
- 6.4 In terms of emerging policy, Paragraph 48 of the NPPF states that local planning policies may give weight to relevant emerging policies, taking into account the stage of preparation of the emerging plan, the extent to which there are unresolved objections to emerging policies, and the degree of consistency those emerging policies have with regard to the wider development framework. The Draft Camden Site Allocations Plan (2020) has been considered in the context of this proposal.

Statutory Tests

- 6.5 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that Local Planning Authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.
- 6.6 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy and Guidance

- 6.7 The Ministry of Housing, Communities and Local Government (now Department for Levelling Up, Housing and Communities) published the revised NPPF in 2021.
- 6.8 The NPPF sets out the Government's economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice (contained within PPG and PPS). Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.9 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF explains that the policies of the Framework, taken as a whole, constitute what the Government considers sustainable development to mean in practice.
- 6.10 The presumption in favour of sustainable development in the new policy guidance is designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in practice, means that significant weight should be placed on the need to support economic growth and housing delivery through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles of sustainability in the Framework.
- 6.11 The NPPF makes clear that the policies should apply unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 49). Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and homes to meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth and housing delivery through the planning system.

6.12 National Planning Practice Guidance (“NPPG”) is an online resource which is maintained by the Department for Levelling Up, Housing and Communities and is regularly updated. It provides guidance relating to a number of planning matters, the Conserving and Enhancing the Historic Environment PPG is considered relevant to the Proposed Development.

Regional Planning Policy

6.13 The new London Plan was published in 2021 which is centred around Good Growth, with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.

Local Planning Policy

6.14 The Camden Local Plan adopted in July 2017 sets out how development will be managed within the borough. The Plan seeks to address a number of challenges; adapting to Camden’s growing population and to social change, the supply and cost of housing in the borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.

7 Assessment – Land Use

7.1 This section considers the proposed development against relevant planning policy.

Principle of Development – Policy

7.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

7.3 Camden Local Plan Policy G1 sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipates the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.

Principle of Development – Assessment

7.4 Following the Government's amendments to the Use Classes Order, which came into effect on 1 September 2020, existing lawful Class B1 (office) uses transitioned into the new Class E use. Having regard to this, the existing lawful use of the premises is now considered to be Class E use.

7.5 Notwithstanding the changes to the Use Classes Order, Camden Local Plan Policy E1 supports additional office floorspace and directs new office development to growth areas, Central London, and town centres. Local Plan Policy E2 seeks to maintain and enhance the quantum and quality of employment floorspace within the borough. The proposals scheme will deliver a much improved office building which will contribute towards the Council's targets of job creation and will also protect the employment floorspace for the future.

- 7.6 It is proposed to refurbish and alter the existing building to provide improved and increased office floorspace and create a building befitting of this prime location. This will involve the provision of 719sqm of additional office floorspace through the proposed creation of a 'second mansard' at sixth floor level, in addition to the extensions at roof level and to the rear.
- 7.7 As previously noted, an application for a Certificate of Lawfulness has been permitted in relation to the proposed partial infilling of the existing internal atrium, confirming that planning permission is not required. This would create a further 531sqm of internal floorspace. For the avoidance of doubt, this application seeks permission for the external works and additional proposed floorspace only.
- 7.8 The existing office building plays an important role within the borough in terms of employment floorspace, however the building is dated, and the internal accommodation is of poor quality. The purpose of the proposed development is to bring the floorspace up to a standard that meets the requirements and needs of modern office occupiers. The proposed development accords with Camden Local Plan Policy G1 through the retention and enhancement of office floorspace and therefore supporting jobs growth within the borough. Policy E2 states the Council will protect employment sites suitable for continued business use and states that intensified use will be considered on sites delivering affordable workspace, where viable. Further to Local Plan paragraph 5.44, the proposed development does not trigger the requirement to deliver affordable workspace, which is sought on schemes delivering in excess of 1,000sqm of floorspace, due to the proposed uplift comprising 719sqm.

Mixed Use – Policy

- 7.9 Policy SD5 of the London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential in all other areas of the CAZ.
- 7.10 Paragraph 1.3.3 of the CAZ SPG sets out that offices and other CAZ strategic functions should be given greater weight relative to new residential development.

- 7.11 Policy H1 of the Camden Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 7.12 Policy H2 of the Camden Local Plan seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires where more than 200sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant. The requirement to deliver affordable housing on Site is subject to a set of criteria which is set out at Policy H4 of the Local Plan and the Housing CPG.
- 7.13 Supporting paragraph 3.53 states ‘Where development adds 1,000sqm (GIA) or more floorspace, the Council considers that it will generally be possible to achieve a significant number of homes on-site sufficient to support the stairs, lifts and circulation space needed to serve them, and will therefore particularly expect on-site provision. The Council therefore acknowledges that residential on sites with an uplift below 1,000 sqm would be challenging’.
- 7.14 Policy H4 of the Local Plan sets out the Council’s approach to affordable housing provision which is based on a site’s capacity to provide housing, with affordable housing being required on a sliding scale between 2% and 50%. The policy also states that where development sites have capacity to provide fewer than 10 dwellings, that the Council will accept the provision of affordable housing as a payment in lieu of on-site provision.

Mixed Use – Assessment

- 7.15 The proposed development would deliver 719sqm of additional office floorspace. Under Local Plan Policy H2 therefore generates a residential requirement of 359.5sqm. Policy H2 states that in considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:
- a. the character of the development, the site and the area;
 - b. site size, and any constraints on developing the site for a mix of uses;

- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. the need to add to community safety by providing an active street frontage and natural surveillance;
- e. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
- f. the extent of any additional floorspace needed for an existing user;
- g. whether the development is publicly funded or serves a public purpose;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing;
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

7.16 During the course of the pre application stage, the Applicant has considered whether it would be possible to provide residential on site in accordance with Policy H2. The policy tests are considered in turn below:

- a. The character of the development, the site and the area

7.17 The building was first constructed between 1890 and 1896 as a residential building. The building was used as an Hotel in the early 20th century and to support the war effort, housing Jewish people who fled Nazi persecution. The building was reconstructed behind a retained façade in the 1990s and has since been used as an office, making a valuable contribution to the quantum of office floorspace within the CAZ where office development is promoted to support the strategic function of London's role as an economic centre and competitiveness in the world market.

7.18 The site is located in a mixed use area where the proposed land use is considered acceptable.

- b. Site size, the extent of the additional floorspace, and constraints on including a mix of units

7.19 The proposal comprises extensions to the rear of the building and the creation of new useable floorspace behind the existing sixth floor roof, in addition to a small amount of new floorspace at seventh floor level. The existing building is 9,841 sqm (GIA). The proposed extension is 719 sqm (GIA). The proposed works are largely internal, seeking to bring the building up to the standard of modern office occupiers following a protracted period of limited investment.

7.20 Notwithstanding this, the design team have explored three options to deliver residential use on site.

7.21 Option 1 comprises four residential flats located at lower ground and ground floor on the northern frontage of the building, accessed from Bedford Avenue.

Option 1 has been discounted on the basis that the units would ultimately be of low quality, with two of the four units being north facing, single aspect, and non-compliant with building regulations (especially in relation to fire). Furthermore, Bloomsbury Street is heavily trafficked, creating poor air quality and noise, both of which would impact residential amenity.

7.22 Option 2 would comprise three residential flats located over first, second and third floors, located on the northern frontage of the building, accessed from Bedford Avenue

The units would all be large 1-bed flats due to the existing structural grid and retained elevation and fenestration pattern. The units would all be north facing, single aspect units, with limited opportunity for ancillary facilities, such as dedicated communal waste and cycle storage. Option 2 has therefore been discounted.

7.23 Option 3 comprises a single 3-bed flat located at the sixth floor, located on the northern frontage of the building, accessed from Bedford Avenue.

Option 3 has been discounted as it would be single aspect and north facing and would require a large, inefficient core, which would rise to sixth floor level to serve the unit. The unit would benefit from no outdoor amenity space and opportunities to provide dedicated waste and cycle parking facilities are limited.

- 7.24 All three options would require new level access and therefore puncturing through the existing red brick Victorian façade. This would likely detract from the contribution the building makes to the character and setting of the Bloomsbury Street Conservation Area.
- 7.25 Additionally, due to the nominal number of units that could be incorporated, the units would most likely be private rented. The provision of housing on site would trigger the delivery of affordable housing (City Plan Policy H4).
- 7.26 The above options have been assessed from a viability perspective. The supporting Financial Viability Assessment (FVA) also demonstrates that the on-site delivery of housing is not financially viable.
- c. The priority the Local Plan gives to the jewellery sector in the Hatton Garden area
- 7.27 The site is not located in Hatton Garden.
- d. Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses
- 7.28 The Applicant's brief was to provide a Grade A, high-quality office refurbishment scheme with modest extensions required to bring the building up to modern standards through the provision of on-floor amenity space at second to fifth floor level, in addition to the provision of a larger amenity space at roof level. The inclusion of residential use would impact on the quality of the residual offices on affected floorplates and would additionally have a negative impact on the embodied carbon of the development due to the requirement for greater levels of intervention.
- 7.29 The red brick Victorian façade, despite not being listed, is of heritage significance. A new entrance would need to be created on the Bedford Street elevation, detracting from the building's historic form and reducing the contribution made to the Bloomsbury Conservation Area.

7.30 Whilst the residential requirement under policy H2 requires 359.5sqm GIA, the actual habitable area would be well below this once cores, refuse/cycle storage/plant has been included.

e. Whether the development is publicly funded or serves a public purpose

7.31 The proposal is not publicly funded.

f. The need to add to community safety by providing an active street frontage and natural surveillance

7.32 The proposal seeks to enhance the entrance points on Bloomsbury Street, which will improve wayfinding and passive surveillance. It would not be possible to further activate the frontage at this site without detrimentally impacting the contribution the original Victorian facades make to the Bloomsbury Conservation Area.

g. The extent of any additional floorspace needed for an existing user

7.33 As the existing lease is due to expire in November 2022, the building will be vacated.

h. The impact of a mix of uses on the efficiency and overall quantum of development

7.34 As set out above, the inclusion of residential use would impact on the quality (and quantity) of the residual offices on affected floorplates and would additionally have a negative impact on the embodied carbon of the development due to the requirement for greater levels of intervention.

i. The economics and financial viability of the development including any particular costs associated with it having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing

7.35 The proposed development seeks to deliver substantially improved high-quality flexible commercial floorspace in the CAZ. The Financial Viability Assessment (FVA), prepared by DS2,

concludes that the introduction of residential use at the site would have cost implications that exacerbate the viability deficit and therefore cannot be supported by the development.

j. Whether an alternative approach could better meet the objectives of this policy and Local Plan

7.36 The Proposed Development is in accordance with the character and established uses within the surrounding area. The historic primary facades would be retained, while the comprehensive internal refurbishment would be supplemented by modest rear extensions and the creation of new floorspace at sixth and seventh floor levels. The proposed development is clearly in accordance with Local Plan Policies E1 and E2 which support new and improved office floorspace the CAZ.

7.37 In light of the above and in the context of Local Plan Policy H2, it is considered that the provision of on-site housing is not possible. As set out in the FVA, the provision of housing as part of the development would not only detrimentally impact the quality of commercial floorspace, while delivering substandard residential accommodation, it would also lead to an unviable scheme. This is due to the modest uplift in commercial floorspace proposed and the overall cost of a major refurbishment. It is therefore concluded that the provision of residential on site is not possible in the context of Local Plan Policy H2.

7.38 In respect of the second cascade within Policy H2, the applicant owns no other buildings within Camden. In addition, the FVA demonstrates that off-site housing could also not be supported by the development for the same reasons as above i.e. purchase and conversion would lead to an unviable scheme.

7.39 In respect of the third part of the policy, using example 1.1 contained in the Housing CPG, 2021, Table 1 sets out the mixed-use residential requirement associated with the proposal (over the page).

Table 1: Mixed Use Calculation

Total additional floorspace proposed	719 sqm (GIA)
Self-contained housing floorspace target	719 x 50 % (as per Policy H2 Target) = 359.5 sqm (GIA)
On-site self-contained housing proposed	0 sqm
Self-contained housing shortfall	359.5 sqm
Payment-in-lieu (PIL) for housing (shortfall in sqm x £1,500)	£539,250.00

- 7.40 The FVA demonstrates that the proposed office refurbishment and extension could not viably support the provision of any contribution towards residential use, including affordable housing, on a present-day basis. This includes any type of contribution, including an off-site contribution or a payment-in-lieu. A housing contribution would further constrain the viability of project and reduce the ability to deliver the Proposed Scheme.
- 7.41 The FVA notes that that the sensitivity testing indicates that there may be potential long term value growth and, taking a long term view of future rental growth, the development may be able to support a form of payment.
- 7.42 Therefore, a review mechanism could be included within a S106 agreement which would require a further viability assessment to be undertaken post completion to review the viability of the scheme. If it is found that a PIL is viable, this money could be put towards other housing projects in the Borough which would help create cohesive communities.

8 Assessment – Design

- 8.1 The Section considers the Proposed Development against relevant national, regional and local design policy and guidance. This Section should be read alongside the Design and Access Statement, prepared by Stiff + Trevillion.

Policy

- 8.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 124 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 8.3 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 8.4 Camden Local Plan Policy C6 seeks to promote access for all by expecting all buildings and places to meet the highest standards of accessibility and inclusive design.
- 8.5 Local Plan design Policy D1 seeks to secure high quality design in development, requiring that local context and character is respected, that the development is sustainable in terms of design, construction and operation, that details and materials complement local character, that the building integrates well with the surrounding streets and open spaces, and that the building is inclusive and accessible.
- 8.6 Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. This includes a general presumption in favour of retaining buildings that make a positive contribution to the character and appearance of a conservation area.

Assessment

- 8.7 As described in Chapter 5 of this Planning Statement, the existing building is outdated and refurbishments are required to enable Grade A commercial accommodation and flexible floorplates to cater for a range of future commercial needs.
- 8.8 The existing building, despite being subject to major development through its lifetime, has retained its two Victorian primary facades facing Bloomsbury Street and Bedford Avenue. The main access to the building is via a reception located on Bloomsbury Street with secondary access to the lower ground floor level from Bedford Avenue via a timber gates and ramp. The Bedford Avenue façade is seen within the context of Bedford Court Mansions and although the properties are not identical, there is consistency and correspondence between them.
- 8.9 The Proposed Development has been designed by Stiff + Trevillion to a very high standard and would retain the historic primary facades, maintaining the valuable contribution the building makes to the streetscape and the Bloomsbury Conservation Area. The comprehensive internal refurbishment would be supplemented by modest rear extensions and the creation of new floorspace at sixth and seventh floor levels which has been carefully sited and designed to minimise perceived visual impact and improve the roofscape in longer views.
- 8.10 To the rear, the existing building comprises a central glazed curtain wall elevation which appears incongruous with the rest of the building, particularly the historic primary facades. In addition, the extensive glazing causing thermal issues due to the façade being south facing. The proposed development re-imagines the south elevation by removing the central glazed curtain walling and introducing a contemporary but sensitive elevation with a more balanced brick to glass ratio. Modest extensions are proposed at second to fifth floor level alongside the creation of stepped terraces. The proposals seek to consolidate the existing inconsistent and incongruous reading of the rear of the building into a cohesive elevation. The rear extension would provide in total circa. 100sqm GIA of Grade A office accommodation. The stepped terraces have been designed to respond to traditional building hierarchy and will deliver valuable on-floor amenity space.

- 8.11 It is proposed to create a sixth floor level at existing roof level and largely behind the pitch of the existing roof. This new habitable storey would be articulated by the addition of a second set of dormer windows within the pitched roofs facing Bedford Avenue, which would be viewed as a double mansard. The subtle addition would have no detrimental impact on building hierarchy, responds to the prevailing character of the immediate vicinity, the conservation area, and is a feature seen elsewhere on Bedford Avenue.
- 8.12 The proposed dormer windows, having been redesigned following initial feedback received at pre-application stage, respond to the existing fenestration pattern on lower floor levels and would match the existing building in terms of materiality. creation of new floorspace at this level without requiring a full scale extension ensures the balance and hierarchy of the existing building is unaffected by the proposed development.
- 8.13 A set-back, seventh floor roof pavilion is also proposed. This would comprise an internal amenity space, providing access to a spacious roof garden with planting. The roof would also provide a sedum roof as well as housing screened plant and a lift overrun which provides access. The existing roofscape appears untidy and incongruous and houses plant, balustrading and the large, sloped glazed roof over the existing internal atrium. All of this would be removed to facilitate the proposed works at this level. The rationalisation of equipment would declutter the roofscape and the new roof level would be a substantial improvement, as it would become a managed and maintained area of the building. The proposed height of the roof extension corresponds to the highest point of the existing building and the proposals have been carefully designed to respond to key views in the area (see chapter 9 and THVIA).
- 8.14 The existing fenestration would be removed and replaced like-for-like with high-quality, sensitively designed windows, which respond to the vernacular of the existing building and prevailing surrounding historic architecture. The high-quality replacements would also have heritage and thermal benefits.
- 8.15 Taking reference from within the Bloomsbury Conservation Area and following feedback received at pre-application stage, the main Bloomsbury Street entrance will be enhanced to provide a high-quality inclusive and legible entrance befitting a Grade A office in Bloomsbury. In response to comments from Officers received during the pre-application process, a refined

revolving door more sensitive to the architectural proportioning of the existing building will replace existing heavy revolving doors. The pass doors and glazed framing surrounding the drum would be subdivided in hierarchy with small, glazed panes reflective of the same architectural style and these would harmonise with the adjoining entrance and exit doors.

- 8.16 Black metal work and stone steps have been incorporated which are a nod to the original decorative metalwork which would have adorned the Bloomsbury Street entrance. The accessible entrance on Bloomsbury Street, which provides step-free access, takes reference from the primary entrance, ensuring it does not appear as secondary.
- 8.17 The same approach has been taken in the design evolution of the Bedford Square entrance which provides access to the end of journey facilities and the servicing area via a ramp.
- 8.18 The proposed development would retain the primary facades of 21 Bloomsbury Street, which are key to the contribution the building makes to the streetscape and the wider conservation area. The proposed development has been designed to respond positively to local context and to respect prevailing local character. The proposed development is of high-quality, inclusive design that seeks to make subtle additions and enhancements to the building to facilitate substantial internal improvements. The proposed development is therefore considered to accord with Camden Local Plan Policy D1 and D2 and with NPPF paragraph 124 and 130.

9 Assessment – Heritage

- 9.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and impact heritage assets, notably the setting of one the Grade I Listed terraces on Bedford Square.
- 9.2 A full analysis of the impact of the proposed development on designated heritage assets is included within the submitted and the Townscape, Heritage and Visual Impact Assessment (THVIA) prepared by KM Heritage and submitted as part of the application and should be read alongside this Section of this Statement.

Policy

- 9.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 9.4 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 9.5 Paragraph 193 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 9.6 Paragraph 196 of the NPPF states that where a development proposal will 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.

- 9.7 In line with paragraph 202 of the NPPF, where the level of harm is assessed to be less than substantial harm, this harm should be outweighed by the public benefits of the proposals.
- 9.8 Local Plan design policy D1 seeks to secure high quality design in development. Policy D2 has regard to heritage assets and stipulates the Council will require that development within conservation areas to preserve, or where possible, enhance the character and appearance of the area. Policy D2 continues that development that would cause harm to the significance of a listed building through an effect on its setting would be resisted. Policy D2 also notes that the Council will seek to protect other heritage assets, including non-designated heritage assets, Registered Parks and Gardens and London Square.

Assessment

- 9.9 The Site is located immediately to the south of Bedford Square, a Grade II* listed Park and Garden. The buildings which front Bedford Square are listed, having varying heritage significance, with the south range being Grade I listed. Indeed, the mews properties on Bedford Avenue, which face 21 Bloomsbury Street, are identified in the Bloomsbury Square Conservation Area Appraisal for their consistent character. More broadly, Bloomsbury is a historically significant area of Central London, which comprises largely original streetscapes in terms of layout and scale.
- 9.10 The THVIA, prepared by KM Heritage, states that 21 Bloomsbury Street was one of the first to be built on the south side of Bedford Avenue, however it underwent heavy alterations during the 1990s. The TP Bennet Architects scheme comprised, **“complete replacement of all roof structures and internal structures, with the addition of a roof to an existing lightwell to create an atrium. All south and west facing façades were replaced. The entrance on Bloomsbury Street was altered and that on Bedford Avenue removed. In 2014, a rear extension with a roof terrace was added at second floor level.”**
- 9.11 The TVHIA acknowledges the evidential and historic significance of 21 Bloomsbury Street in representing Victorian and Edwardian development in this part of Bloomsbury. The

immediate vicinity possess significance, **“by virtue of the area’s role in the 18th and 19th century northern expansion of London and the overall development of Bloomsbury as an urban quarter.”**

- 9.12 In acknowledging the contribution, the exiting building makes to the Bloomsbury Conservation Area, the TVHIA states the building is, **“a modest instance of late Victorian development in the area. It retains much of its architectural character, materiality and detailing in its facades to Bloomsbury Street and Bedford Avenue, despite the 1990s changes to the building, but behind these street elevations, the building has no architectural quality of any note.”**
- 9.13 The proposed development comprises comprehensive internal refurbishment with modest rear and roof level extensions to provide a substantially improved office building.
- 9.14 As noted, the building’s significance and contribution to the character of the Bloomsbury Conservation Area, and the setting of listed buildings in the immediate vicinity of the site, lies in the primary facades on Bloomsbury Street and Bedford Avenue. These facades will be retained and repaired where necessary to ensure their longevity and continued contribution to nearby heritage assets.
- 9.15 The proposed development would also introduce a second level of subtly designed and sensitively sited dormers to facilitate the creation of additional floorspace within the existing pitched roofscape. This would partially house plant equipment, which contributes to the general tidying up at roof level, which includes the removal of existing unsightly plant and the replacement of existing faux chimney stacks. The extent of seventh floor level extension is limited and it has been sited and sized to minimise visibility. Views of the proposed development have been tested in a series of accurate visual representations, prepared by Miller Hare and included in the Design and Access Statement. The THVIA considers that the consolidation at roof level will improve the relationship with Bedford Court Mansions and represents an improvement in the visible massing from Bedford Square and the wider Bloomsbury Conservation Area.
- 9.16 The Council’s first formal written response, dated 16 May 2022, noted that the original window casements have been removed and replaced with poor quality imitations which are

in a state of disrepair having lacked durability. The written response states, **“this presents an opportunity to introduce casements that are both architecturally appropriate and thermally efficient.”** The significance and prominence of the primary facades on Bloomsbury Street and Bedford Avenue dictates the installation of a historically sensitive fenestration system. It is primarily proposed to replace the windows like-for-like, however casement windows will be installed at fifth and sixth floor level, which correspondence to the hierarchy of the fenestration patterns found at Bedford Court Mansions. The proposed removal and replacement with high-quality casement windows represent a demonstrable improvement on the existing poor, modern windows. The THVIA confirms the replacement of the windows is based on an assessment of the existing fenestration, a review of the fenestration on Bedford Court Mansions, and a balance between historical authenticity and contemporary requirements.

- 9.17 The alterations to the entrances too have been designed in reference to historic architectural detailing found at 21 Bloomsbury Street and the wider Bloomsbury Conservation Area.
- 9.18 The rear of the building lacks is modern and lacks architectural quality. The proposed reimagined rear elevation is balanced and provides contemporary and sensitive approach, which complements the retained primary Victorian facades and is sensitive to its context comprising the rear of buildings fronting Great Russell Street.
- 9.19 Overall, the proposed works are subtle and seek to substantially enhance the building internally, while ensuring that external alterations only consolidate and improve the building’s contribution to the conservation area and its impact on the setting of nearby heritage assets. The THVA concludes that, **“the effect of the proposed scheme upon the character and appearance of the Bloomsbury Conservation Area or the setting of other nearby heritage assets will be either neutral (by not being visible from the setting of nearby listed buildings or within the sub-area of the conservation area) or positive, removing from view what should not be seen. Their heritage significance is safeguarded, sustained and enhanced. The character and appearance of the conservation area will be preserved and enhanced – the positive contribution made by 21 Bloomsbury Street to the Bloomsbury Conservation Area will be sustained for the long term.”**

- 9.20 In terms of the effect upon other further removed heritage assets, the THVIA considers that given the lack of intervisibility and degree of separation from the site, their heritage significance will be safeguarded and sustained. The THVIA concludes that, **“the setting of the listed buildings, and thus their special architectural or historic interest, will be preserved. The local interest of positive contributors to the conservation area is similarly preserved.”**
- 9.21 The proposals are therefore considered to accord with Camden Local Plan Policies D1 and D2, London Plan and NPPF paragraphs 193, 196 and 202.

10 Assessment – Sustainability

10.1 This section considers the Proposed Development against relevant planning policy regarding sustainability. Sweco has prepared an Energy and Sustainability Statement which has been submitted as part of this application.

Policy

10.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision- taking.

10.3 The NPPF contains the Government’s policy on climate change. NPPF paragraph 20 encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.

10.4 NPPF paragraph 119 encourages development that makes as much use as possible of previously developed or ‘brownfield’ land.

10.5 NPPF Paragraph 152 sets out that planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

10.6 Paragraph 149 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change. Paragraph 150, states that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways that reduce greenhouse gas emissions; such as through suitable adaptation methods, location, orientation and design.

10.7 Policy GG6 of the London Plan considers how London can become a more efficient and resilient city. The policy highlights the needs for developments to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London

- becoming a zero-carbon city by 2050, as well a need for developments to ensure buildings and infrastructure are designed to adapt to a changing climate.
- 10.8 London Plan Policy D3 advises that developments should aim for high sustainability standards and take into account the principles of the circular economy.
- 10.9 London Plan Policy SI4 states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 10.10 Policy SI2 of the London Plan states that major development should be net zero carbon by achieving reductions in greenhouse gases in operation and through the energy hierarchy of; “be lean, be clean, be green, be seen”. Part C of the policy sets out that a minimum on site reduction of 35% is required for major development, 10% of which should be achieved through energy efficiency measures for residential development.
- 10.11 A carbon offsetting contribution will be sought for the remainder to make up the shortfall to net zero at a rate of £95 per tonne for 30 years.
- 10.12 Policy SI7 of the London Plan sets out how developments should reduce waste and support the circular economy, by promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible by encouraging waste minimisation through re-use. It sets targets for 95% re-use, recycling and recovery of construction and demolition waste, and 95% beneficial use of excavation materials.
- 10.13 In July 2019, Camden declared a climate emergency and subsequently published a Climate Action Plan setting out how the Council will work towards zero carbon by 2020.
- 10.14 Policy CC1 of the Local Plan sets out that the Council will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation by promoting zero carbon development, requiring all development to reduce carbon dioxide emissions through the London Plan energy hierarchy and to promote sustainable travel.

10.15 Part E of the policy requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. The supporting text at paragraph 8.17 of the Plan states that all proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.19 of the Plan states that the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency.

10.16 Policy CC2 of the Local Plan requires all development to be resilient to climate change by promoting sustainable design and construction measures. Developments involving conversions of over 500sqm should achieve BREEAM "Excellent" for domestic and non-domestic buildings.

Assessment

10.17 The Energy Strategy for the building proposes an all-electric HVRF system with thermal storage, free cooling from summer by-pass from the mechanical ventilation heat recovery units and openings on the facades for natural ventilation.

10.18 The proposed scheme will comply with the London Plan 2021, Approved Document Part L Volume 2 (Conservation of Fuel, and Power) of the Building Regulations 2021.

10.19 The Energy and Sustainability Statement, prepared by Sweco provides full detail of the energy strategy and the sustainability credentials of the proposed development. The Statement confirms that following the energy and carbon evaluation, it is proposed that extensive energy efficiency measures, along with low, and zero carbon technologies are incorporated into the design. The energy and carbon emissions calculation confirm that the proposed development will, inter alia, achieve:

- Regulated carbon dioxide savings of 2% relative to a New-Build Part L 2021 at Be Green stage and 36% at Be Lean stage;
- BREEAM UK Refurbishment and Fit-out 2014 targeting "Excellent" for office areas with aspiration for "Outstanding";

- WELL Standard v2 'Core' targeting "Gold" with an approach to pre-certificate and certify the building at a later stage; and
- All-electrical development by removing the gas-fired boilers and CHP onsite.

10.20 The proposed development would be net zero carbon for operational and embodied energy, and carbon offsetting is therefore not applicable to this scheme.

10.21 A BREEAM Pre-assessment, also prepared by Sweco, indicates that the proposed development would achieve an 'Excellent' rating.

11 Assessment – Transport, Waste, Servicing and Deliveries

11.1 Chapter 9 of the NPPF sets out the Government’s policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 110 of the NPPF states it should be ensured that:

- i. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- ii. safe and suitable access to the site can be achieved for all users;
- iii. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- iv. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

11.2 London Plan Policy T1 ‘Strategic approach to transport’ examines the integration of transport and development, outlines that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.

11.3 London Plan Policy T1 also states that developments should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

11.4 London Policy T2 advises that development proposals should promote and demonstrate the application of the Mayor’s Healthy Streets Approach to: improve health and reduce health

- inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.
- 11.5 Policy T4 requires the submission of transport assessments/statements with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 11.6 London Plan policy T5 sets out minimum cycle parking standards for new developments. For office (Class B1) use, Table 10.2 requires one space per 75 sqm GEA for long stay cycle parking, for short stay cycle parking, the requirements are 1 space per 500sqm GEA for the first 5,000sqm, and thereafter 1 space per 5,000sqm GEA.
- 11.7 Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in Camden by supporting public realm improvements and the pedestrian environment, promoting cycling and providing high quality parking and end of trip facilities in developments. Policy T2 of the Local Plan requires all new development in the Borough to be car free. Policy T4 of the Local Plan requires developments over 2,500sqm to provide Construction Management Plans, Delivery and Servicing Management plans and Transport Assessments.
- 11.8 Policy T2 of the Local Plan states that the Council will require new developments in the borough to be car free and will not issue on-street or on-site parking permits in connection with new development. On-site parking will be limited to spaces designated for disabled people and/or essential operational or servicing needs.
- 11.9 The Transport CPG published in March 2019 provides detailed guidance relating to deliveries and servicing, cycle parking and end of trip facilities.
- 11.10 The Camden Transport Strategy 2019-2041 sets out the visions and objectives for transport in the borough, in order to help people to travel more sustainably and live healthier lives, whilst reducing pollution and improving air quality.

Assessment – Parking

- 11.11 This planning application is supported by a Transport Statement (TS), prepared by Momentum. The site benefits from a PTAL rating of 6b, indicating excellent access to public transport. The site sits on the corner of Bloomsbury Street and Bedford Avenue.
- 11.12 The site currently has off-street car parking capacity for five cars and 40no. bicycles with 6no lockers. It is in close proximity to 126 TfL Santander cycle docks. The London Underground stations Goodge Street, Tottenham Court Road, Holborn, Covent Garden, Leicester Square, Oxford Circus, Euston Square, Euston and Euston National Rail Station are all within walking distance. There are 27 car club bays within 1km of the site.
- 11.13 In terms of on-site cycle parking, the London Plan requires that 1no. long-stay space is provided per 75sqm GEA and 1no. short-stay space is provided per 500sqm GEA. The proposed development would, together with the atrium infill, deliver an uplift of 1,368sqm of office floorspace (GEA). Together with the existing retained floorspace, the requirement would be for 162no. long-stay parking spaces and 12no. short-stay spaces.
- 11.14 There are currently 40no. of cycle parking spaces located at basement level. The cycle parking area shares the basement area with the waste and servicing area and is accessed via a ramp from Bedford Avenue. The proposed development would deliver 174no. cycle parking spaces in total. Of these, 162no. would be long stay and the remaining 12 would be designed for short stay visitor trips. The long stay spaces would be provided as a combination of two-tier racks, Sheffield stands, Brompton spaces, wall mounted racks and in accordance with London Cycle Design Standards (2014), 5% or 8 spaces, will be provided for adaptable cycles. Short stay spaces would be provided both within the facility at basement floor level and also on the footway on Bedford Avenue.
- 11.15 End of journey facilities will also be provided within the basement area, comprising of 17no. showers (including one accessible shower) and 108 cycle lockers, with separated male, female and mixed changing areas.

- 11.16 In accordance with London Plan Policy T6 and Local Plan Policy T2, no car parking will be provided on site and the proposed development is car free.

Assessment - Waste

- 11.17 In addition to the TS, a framework Delivery and Servicing Management Plan (DSMP) has been prepared by Momentum and is submitted in support this planning application. Chapter 5 of the framework DSMP deals with the proposed waste management strategy for the building.
- 11.18 Waste collection will take place on street as per the existing arrangement. A BS 5906 compliant waste store will be provided at basement level and will be accessible via the cycle ramp on Bedford Avenue. An electric bin mover will be provided to roll bins along the gradient of the ramp up to street level where they will be picked up. Waste would be segregated into waste streams that would separate general waste, recyclables, and food waste.
- 11.19 A private waste contractor will be engagement to collected waste every two days.

Assessment - Servicing and Deliveries

- 11.20 The existing off-street loading bay is spatially constrained, providing no turning circle. Access is also limited due to the size of the opening and the ramp. The off-street bay is therefore poorly used with servicing and deliveries tending to happen informally at street level. As a result, and due to the harm to the external appearance of the building that would be imposed in order to make the bay fully functional, it is proposed to remove the bay entirely. The removal would facilitate the installation of a 174no. cycle parking spaces and the high-quality end of journey facilities discussed in the previous section as well as provision for off-street cargo bike servicing.
- 11.21 Due to the constraints with providing a dedicated formal on-street servicing, a predominantly cargo bike delivery strategy is proposed for the refurbished building. Full details of the strategy are set out in the TS and the framework DSMP. The strategy would be secured via legal agreement and would see a minimum of 75% of forecast vehicular deliveries made by cargo bike. The proposed strategy represents a sustainable solution which actively reduces

the impact of the proposed development on the existing highways network and therefore contributes to improving air quality in Camden. This proposal is in line with policies T1 and T4 of the Local Plan.

12 Assessment – Amenity

- 12.1 Paragraph 130 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 12.2 Camden Local Plan Policy A1 seek to protect the quality of life of occupiers and neighbours and states the Council will grant permission for development unless this would cause unacceptable harm to amenity. The Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected, having regard to visual privacy, outlook, daylight and sunlight, highways impacts, noise and vibration levels and impacts of construction.

Daylight and Sunlight

- 12.3 London Plan Policy H6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 12.4 Lumina have prepared a Daylight and Sunlight Assessment which is submitted in support of this planning application. The Assessment has been prepared in accordance with BRE Guidelines (2022).
- 12.5 The Daylight and Sunlight Report prepared states that the only existing neighbouring residential properties that could be affected by the proposed development is Bedford Court Mansions. All of the rooms/windows serving the flats in close proximity of the development have been tested for VSC, Internal Daylight Distribution and Annual and Winter Sunlight and the results show that there will be full and comfortable compliance with the tests and standards in the BRE Guidelines.
- 12.6 The Report concludes that the effects caused by the Proposed Development on nearby residential properties will be entirely compliant with BRE criteria and it is considered that the Proposed Development meets National, Regional and Local policies.

Noise

- 12.7 Camden Local Plan Policy A4 (Noise and vibration) sets out the council will seek to ensure that noise and vibration is controlled and managed and that planning permission would not be granted for development likely to generate unacceptable noise and vibration impacts, or development sensitive to noise in location which experience high noise levels. Planning permission will only be granted for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.
- 12.8 Sweco have been instructed to provide an acoustic assessment of atmospheric noise emission from the proposed building services equipment to the nearest noise sensitive receptors in line with Camden Local Plan Policy A4.
- 12.9 An environmental noise survey was undertaken from 10 March 2022 and 15 March 2022 in order to cover typical weekdays and the weekend.
- 12.10 From their acoustic survey Sweco established the daytime and night time noise criteria in line with technical guidance note. The proposed plant is only operational during daytime hours and noise levels calculated at the nearest sensitive receptors, being two top floor residential dwellings at 40-71 Bedford Avenue, which sits to the west of the site. The rear of the Radisson Blu Hotel was also identified one of the nearest noise sensitive properties. The assessment confirms that the noise control measures and further assessment of the building services noise to be carried during the detailed design phase to inform the selection of attenuation will ensure that the building services noise level limits are achieved.

Terraces & Overlooking

- 12.11 The proposed development comprises a series of stepped terraces to the rear at second to fifth floor level. Additionally, the seventh floor level will provide landscaped amenity space for office users. Due to the proximity of neighbouring buildings, particularly Bedford Court Mansions to the west, the Florida State University building at 98-99 Great Russell Street and the Radisson Blu Hotel at 97 Great Russell Street, both to the south, technical analyses have

been undertaken that confirm that there would be no detrimental impact on the neighbouring sensitive uses in respect of daylight and sunlight, and noise.

- 12.12 An additional study has been undertaken with respect to overlooking, the details of which are set out in full in the supporting Design and Access Statement, prepared by Stiff + Trevillion.
- 12.13 Regarding the rear, the overlooking study details that terrace lengths and planting treatment ensure that there is no overlooking from the proposed development to the hotel or the adjacent educational building. Furthermore, users of the terraces would be separated from the adjacent users by the planters, further minimising any adverse impact on amenity.
- 12.14 Views from the sixth floor terrace and seventh floor amenity space towards the residential units at Bedford Court Mansions will be obscured by screening and planting, ensuring that there is no direct intervisibility between the two uses.

13 Summary and Conclusions

- 13.1 The proposals provide the opportunity to substantially improve the existing office building via a sensitive and sustainable refurbishment and extension. The proposals will maximise the retention of embodied carbon on site whilst making sensitive interventions to the building to both modernise it to a high standard and incorporate principles of health, wellness, flexibility and environmental responsibility. The design proposal meets and exceeds the targets set for sustainability.
- 13.2 The design philosophy and project brief has been to work with the existing building to deliver high quality and flexible commercial space with a clear and strong identity. The proposals comprise a comprehensive internal refurbishment with modest extensions at roof level and to the rear to provide high-quality office accommodation. Alterations and extensions have been designed to minimise change to the primary facades and, in new areas, to mediate happily with the surrounding townscape.
- 13.3 The application for these proposals follows pre-application consultation with officers of the London Borough of Camden, statutory consultees, local residents and local community groups. During this process, the team has positively responded to feedback within the proposed design.
- 13.4 The proposed development will increase the office floorspace at the site by 719sqm, deliver significantly improved office floorspace, with improved accessibility, outdoor amenity space and end of journey facilities befitting of this prominent Central London location.
- 13.5 The site benefits from excellent public transport accessibility and transport, servicing and waste matters have been thought through in detail and are addressed as part of this application. The existing lower ground floor will be transformed into a cycle and commuter hub for employees together with provision for a cargo bike servicing strategy.
- 13.6 Amenity matters have been carefully considered with BRE guidance met for daylight and sunlight and noise criteria met for plant noise. Overlooking from proposed terraces will be mitigated through screening and planting, blocking users from direct overlooking and directing user's views.

- 13.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Town Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 13.8 In conclusion, these proposals comply with the relevant statutory tests, policies within the NPPF, the London Plan, the Camden Local Plan, relevant emerging planning policy and the principles of the presumption in favour of sustainable development. The proposals meet the aspirations of the statutory development plan, which actively supports office development in this location. From the assessment set out in this Statement, it is concluded that there are no material considerations of sufficient weight to determine that these applications are other than in accordance with the Development Plan. We therefore consider that planning permission should be granted accordingly.

OFFICES

London (West End)
72 Welbeck Street
London W1G 0AY
Tel. +44 (0)20 7493 3338

London (City)
Bow Bells House
1 Bread Street
London EC4M 9BE
Tel. +44 (0)20 7489 8900

Birmingham
45 Church Street
Birmingham B3 2RT
Tel. +44 (0)121 616 4800

Cardiff
32 Windsor Place
Cardiff CF10 3BZ
Tel. +44 (0)29 2038 8044

Glasgow
140 West George Street
Glasgow G2 2HG
Tel. +44 (0)141 221 6397

Leeds
1 York Place
Leeds LS1 2DR
Tel. +44 (0)113 204 8419

Manchester
No1 Marsden Street
Manchester M2 1HW
Tel. +44 (0)161 259 0450

Milton Keynes
Avebury House
201-249 Avebury Boulevard
Milton Keynes MK9 1AU
Tel. +44 (0)1908 685950

West Malling
35 Kings Hill Avenue
West Malling
Kent ME19 4DN
Tel. +44 (0)1732 229420