

<b>Address:</b>	14 Bedford Row, 12-13 and 14 Jockey's Fields London Holborn WC1R 4ED		<b>1/2</b>
<b>Application Number(s):</b>	1) 2024/1810/P 2) 2024/1764/L	<b>Officer:</b> Josh Lawlor	
<b>Ward:</b>	Holborn and Covent Garden		
<b>Date Received:</b>	08/05/2024		
<b>Proposal:</b>	<p>1) Change of use from Office (Use Class E) to Apart-Hotel (Use Class C1), partial demolition of link structure, introduction of terrace, rooftop plant and other associated physical works.</p> <p>2) Internal alterations associated with the change of use from Office (Use Class E) to Apart-Hotel (Use Class C1), partial demolition of link structure, introduction of terrace, rooftop plant and other associated physical works.</p>		

**Background Papers, Supporting Documents and Drawing Numbers:**

Planning Statement, prepared by Savills; Cover Letter, prepared by Savills; Marketing Evidence, prepared by CBRE; Interest Schedule, prepared by CBRE; Design and Access Statement, prepared by White Red Architects; Existing and Proposed Plans, prepared by White Red Architects; Heritage Statement, prepared by Donald Insall Associates; Acoustic Report, prepared by Venta; Air Quality Assessment, prepared by RWDI; Construction Management Plan, prepared by Motion; Energy Statement, prepared by EnergyLab; Sustainability Statement (incl. BREEAM Pre-Assessment), prepared by EnergyLab; Landscaping Scheme, prepared by White Red Architects; Transport Assessment (incl. Travel Plan and Delivery and Servicing Management Plan), prepared by Motion; Sustainable Drainage Systems (SuDS) Strategy, prepared by Elliot Wood; Fire Safety Statement, prepared by Semper; Statement of Community Involvement, prepared by Concilio.

5491\_P00001\_P01\_Site Location Plan; 5491\_P01302\_P01\_Existing Section EE; 5491\_P01099\_P01\_Existing Basement Plan; 5491\_P01100\_P01\_Existing Ground Floor; 5491\_P01101\_P01\_Existing First Floor; 5491\_P01102\_P01\_Existing Second Floor; 5491\_P01103\_P01\_Existing Third Floor; 5491\_P01104\_P01\_Existing Fourth Floor; 5491\_P01105\_P01\_Existing Roof Plan; 5491\_P01200\_P01\_Existing Bedford Row Elevation; 5491\_P01201\_P01\_Existing Jockeys Fields Front Elevation; 5491\_P01202\_P01\_Existing Jockeys Fields Rear Elevation; 5491\_P01300\_P01\_Existing Sections AA and BB; 5491\_P01301\_P01\_Existing Sections CC and DD

5491\_P12099\_P01\_Demolition Basement Plan; 5491\_P12100\_P01\_Demolition Ground Floor; 5491\_P12101\_P01\_Demolition First Floor; 5491\_P12102\_P01\_Demolition Second Floor; 5491\_P12103\_P01\_Demolition Third Floor;

5491\_P12104\_P01\_Demolition Fourth Floor; 5491\_P12105\_P01\_Demolition Roof Plan; 5491\_P12200\_P01\_Demolition Bedford Row Elevation; 5491\_P12201\_P01\_Demolition Jockeys Fields Front Elevation; 5491\_P12202\_P01\_Demolition Jockeys Fields Rear Elevation; 5491\_P12300\_P01\_Demolition Sections AA and BB; 5491\_P12301\_P01\_Demolition Sections CC and DD; 5491\_P12302\_P01\_Demolition Section EE

5491\_P00099\_P01\_Proposed Basement Plan.; 5491\_P00100\_P01\_Proposed Ground Floor; 5491\_P00101\_P01\_Proposed First Floor; 5491\_P00102\_P01\_Proposed Second Floor; 5491\_P00103\_P01\_Proposed Third Floor; 5491\_P00104\_P01\_Proposed Fourth Floor; 5491\_P00105\_P01\_Proposed Roof Plan; 5491\_P00200\_P01\_Proposed Bedford Row Elevation; 5491\_P00201\_P01\_Proposed Jockeys Fields Front Elevation; 5491\_P00202\_P01\_Proposed Jockeys Fields Rear Elevation; 5491\_P00300\_P01\_Proposed Sections AA and BB; 5491\_P00301\_P01\_Proposed Sections CC and DD

**RECOMMENDATION SUMMARY:**

- 1) Grant conditional planning permission subject to a Section 106 Legal Agreement.
- 2) Grant conditional listed building consent.

<b>Applicant:</b>	<b>Agent:</b>
C/O agent	Savills Matthew Lloyd-Ruck 33 Margaret Street London W1G 0JD

**ANALYSIS INFORMATION**

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Commercial, business and service	2,358.2	0	-2,358.2
C1	Apart-Hotel	0	+2,293	+2,293 (there would be a net loss of 65 sqm of floorspace on the site)

<b>Parking details</b>			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	0	0	0
Car - Disabled accessible	0	1 (secured through a financial contribution)	1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	+4	+ 4
Cycle – short stay	0	+2 (secured through an off-site contribution)	+2

## **EXECUTIVE SUMMARY**

- i) The applications are for change of the use of the existing office buildings at 14 Bedford Row and 12-13 and 14 Jockey's Fields to a Class C1 apart-hotel use, providing 65 bedrooms. The proposal includes associated internal and external works including partial demolition and reconstruction of the link structure, creation of a terrace and rooftop plant.
- ii) The previous tenants, the Chartered Society for Physiotherapy, relocated due to the cellular layout, size and sub-optimal internal accessibility. This application is supported by two-plus years of marketing evidence, which demonstrates a lack of market demand for the Class E office space. The site's deep cellular floorplates contributed to the lack of market interest. It is also considered that the site is likely to require more investment than a rational owner would want to invest into the site with no guarantee of an end-user given the quality of the space which could be provided. The existing site is not considered to be suitable for continued business use. Therefore, the loss of employment use does not conflict with policy E2 of the Local Plan subject to a contribution to create or promote opportunities for employment or training of local people per the CPG (Employment Sites and Business Premises).
- iii) The London Plan and Local Plan support the delivery of visitor infrastructure within the Central Activities Zone, which is near many destinations and attractions. The proposed aparthotel will bring a listed building that has been vacant since September 2021 back into use. The proposal will enhance and optimise the buildings' environmental performance by retaining and upgrading the building fabric and services strategy.
- iv) The proposal does not harm the listed building's or the Bloomsbury Conservation Area's special architectural interest.
- v) Subject to the recommended conditions and S106 obligations, the development would not harm neighbouring amenities, the local transport network, or infrastructure.

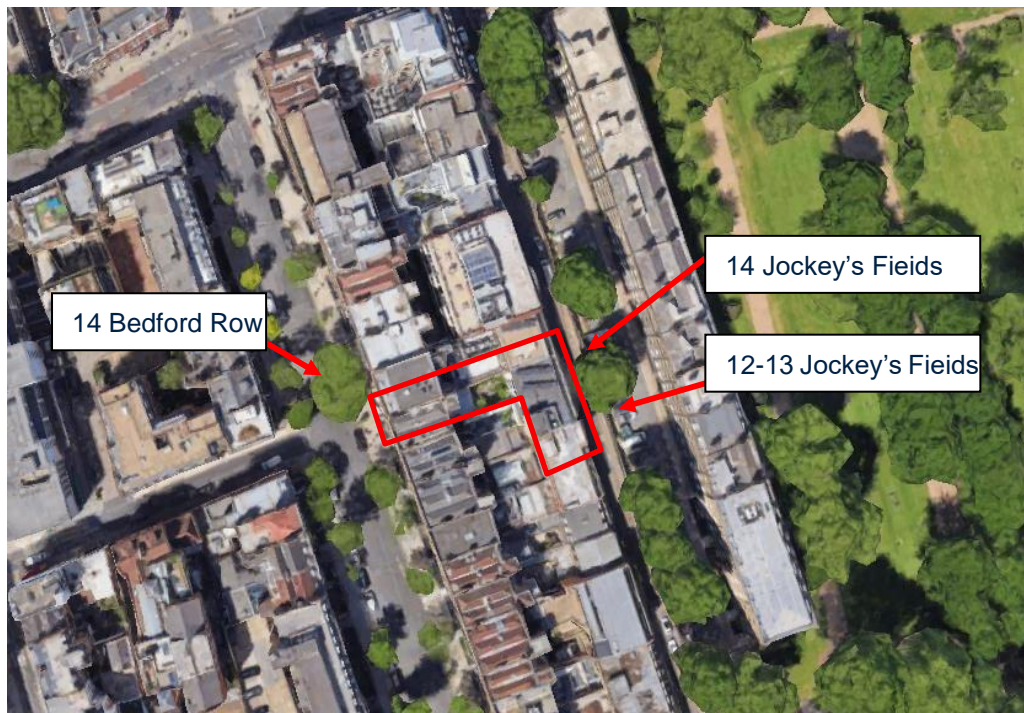
## OFFICER REPORT

**Reason for Referral to Committee: Development involving the change of use of more than 1,000 sqm of non-residential floorspace (Clause 3(ii)); and subject to the completion of a legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).**

### 1. SITE AND BACKGROUND

#### *Location*

- 1.1 The site comprises three buildings and a central link structure between them. These are 14 Bedford Row, 12- 13 Jockey's Fields, and 14 Jockey's Fields. The site has an area of 2,358.2 sqm (GIA); the existing use is Use Class E. Figure 1 illustrates the location of the site and the extent of its ownership boundary.



*Figure 1 Site Location Plan*

- 1.2 The existing office premises' primary frontage faces Bedford Row. 14 Bedford Row is a Grade II listed building (List Entry Number: 1244599) arranged over lower ground, ground, and four upper floors.
- 1.3 12-13 Jockey's Fields is arranged over the ground to third floor. The ground floor comprises two garages sold on a long leasehold basis to neighbouring occupiers which does not form part of the application. 14 Jockey's Fields is arranged over lower ground, ground and three upper floors and is connected to 14 Bedford Row via a central link structure.

- 1.4 The premises are currently vacant (since September 2021) except for the two garages on Jockey's Fields. The Chartered Society of Physiotherapy previously occupied the site but relocated to smaller, more modern premises.
- 1.5 There is a neighbouring residential dwelling at number 13, Bedford Row.
- 1.6 The site is a short walk from Holborn and Chancery Lane Underground Stations. The site has a 6(B) PTAL rating, the highest possible score.
- 1.7 The site is located within London's Central Activity Zone (CAZ) and Knowledge Quarter. The area around Bedford Row and Jockey's Fields is predominantly commercial, notably offices associated with the legal sector.
- 1.8 The site is within the Bloomsbury Conservation Area. It is identified within Sub Area 10: Great James Street/Bedford Row of the Bloomsbury Conservation Area appraisal and management plan. There are several designated heritage assets adjacent to or opposite the site. These are:
  - 8-13 Bedford Row, which is Grade II\* Listed Building (List Entry Number: 1244602);
  - 15-16 Bedford Row, which is a Grade II\* Listed Building (List Entry Number: 1244605);
  - 17 Bedford Row, which is a Grade II Listed Building (List Entry Number: 1244575);
  - 29-32 Bedford Row, which is a Grade II Listed Building (List Entry Number: 1244577);
  - 33-36 Bedford Row, which is a Grade II Listed Building (List Entry Number: 1244579); and
  - Gray's Inn, which is a Grade II Listed Park and Garden (List Entry Number: 1000351)
- 1.9 The site is located in an area of low probability of flooding (Flood Zone 1).

## **2. THE PROPOSAL**

- 2.1 The proposal is to convert the existing office (Class E) into an aparthotel (Class C1). The use is targeted at those working in proximity to nearby legal sectors or tourists.
- 2.2 The existing development currently has a GIA of 2,358 sqm, which this application would decrease by 65 sqm to 2,293 sqm as a section of the existing rear link would be demolished at the ground floor. A broad summary of works include:
  - 65 hotel rooms;
  - 1,191 sqm of proposed guest room NIA;
  - 57 sqm of proposed indoor amenity NIA;
  - 35 sqm of proposed outdoor amenity NIA;

- Reception space; and
  - Refuse / ancillary / back of house space.
- 2.3 No changes are proposed to the street-facing elevation at 14 Bedford Row. The interior layout would be altered to provide rooms with private facilities. Flues are to be removed from the top of the roof. A new door and window at the ground level of the rear elevation of 14 Bedford Row are proposed. A new door is proposed to the third-floor terrace of 12-13 Jockey's Fields, with a set-back green buffer. A proposed fire door and louvred door at the ground-level south corner would facilitate access to the new secure cycle storage. This will contain a minimum of 4 long-stay cycle spaces. High-level louvres on the ground floor are also proposed at 14 Jockey's Fields.
- 2.4 Two plant locations on top of the roof are proposed, one on 12-13 Jockey's Fields and the other on 14 Jockey's Fields. Acoustic screening is to be installed surrounding the plant.
- 2.5 Two new windows are proposed on the internal elevation of 12-13 Jockey's Fields. These will match the existing window lower down and use visually obscured glass on the lower panes.
- 2.6 A courtyard is proposed to be created at the lower ground level by partially removing the northern part of the link structure. The courtyard will bring daylight into the lower-level rooms and feature an internal planted garden.
- 2.7 The existing plant structure would be rationalised into a single plant enclosure on the eastern part of the link structure, and a planted amenity terrace would be created for guests/residents.

### **3. RELEVANT HISTORY**

#### ***14 Bedford Row***

- 3.1 2014/4323/L (LBC) - Alterations to acoustic screen on rear flat roof (as amendment to Listed Building Consent 2013/1562/L). Granted 08/08/2014
- 3.2 2014/3408/P (NMA) - Increase in height of the acoustic screen and incorporating louvers at low level under planning permission 2013/1179/P dated 02/05/2013. Granted 08/08/2014
- 3.3 2013/7819/L (LBC) - Addition of mullion to windows, and alterations to rooflight. Granted 17/02/2014
- 3.4 2013/7944/P (NMA) - Addition of mullion to windows, and alterations to rooflight approved under planning permission 2013/1179/P dated 2/5/13. Granted 17/02/2014

- 3.5 2013/1179/P - External alterations to include the replacement of existing windows, roof covering, and acoustic screen, installation of new handrails and repositioning of existing handrail to Jockey's Field block and Bedford Row office buildings (Class B1). Granted 02/05/2013
- 3.6 2013/1562/L (LBC) - External alterations to include the replacement of existing windows, roof covering, and acoustic screen, installation of new handrails and repositioning of existing handrail to Jockey's Field block and Bedford Row office buildings (Class B1). Granted 02/05/2013
- 3.7 2012/3111/P - Alterations to third floor and roof to the rear for: replacement of the existing covering to the flat roof, raising of a section of the parapet and relocation of the safety handrails along the northeast and southwest elevations, Installation of photovoltaic panels on the flat roof and the replacement of the existing single/double glazed windows all associated with the use as Offices (Class B1). Granted 10/08/2012

### ***Neighbouring sites***

- 3.8 2016/1351/P Installation of electric vehicle charging points on the Gray's Inn Estate, at 12-15 Jockey's Fields, South Square, Gray's Inn Square and adjacent to 1 Verulam Buildings. Granted 04/08/2016
- 3.9 PS9804708R2 Change of use of 12 and 13 Bedford Row from office (Class B1) to residential (Class C3) to provide 2 single family dwelling houses, and the introduction of 2 single garages, plus internal and external alterations, the part demolition and rebuilding of the rear extension to no 12 Bedford Row and the erection of a double height glazed extension to rear of 13 Bedford Row, as shown on drawing numbers, 9856/D01C, D04, S5, D05A, D06A, D02B, D03B, C03B, accompanying letters relating to repair and refurbishment of sash windows and window sills (5.1.99); repair and replacement of cornices (5.1.99); rear elevation repairs(18.12.98);floor adjustment (18.12.98); fire protection (15.3.99); statement in regard to the construction of a glass extension to rear of 13 Bedford Row (11.3.99); survey of architectural features (July 1998). Existing:- 9865/S1A, S2A, S3A, S4. Granted 22/04/1999

## **4. CONSULTATION**

### ***Statutory consultees***

#### Historic England

- 4.1 Historic England responded to a consultation letter giving authorisation for the Local Planning Authority to determine the application.

#### Thames Water

- 4.2 No objection subject to conditions being imposed on the planning permission.

### ***Local groups***

4.3 No comments were received.

### ***Adjoining occupiers***

4.4 4 sites notice were displayed for the Listed Building Consent and 4 for the Full planning application as follows:

- 2 x SN outside 14 Bedford Row.
- 2 x SN across the street opposite 14 Bedford Row.
- 2 x SN at rear of number 14 outside 12 Jockey's Fields.
- 2 x SN at the rear across the street opposite 12 Jockey's Fields.

4.5 No comments were received

## **5. POLICY**

### ***National and regional policy and guidance***

[National Planning Policy Framework 2023 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

### ***Local policy and guidance***

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)



[Policy CC5 Waste](#)  
[Policy TC1 Quantity and location of retail development](#)  
[Policy TC2 Camden's centres and other shopping areas](#)  
[Policy TC3 Shops outside of centres](#)  
[Policy TC4 Town centre uses](#)  
[Policy TC5 Small and independent shops](#)  
[Policy T1 Prioritising walking, cycling and public transport](#)  
[Policy T2 Parking and car-free development](#)  
[Policy T3 Transport infrastructure](#)  
[Policy T4 Sustainable movement of goods and materials](#)  
[Policy DM1 Delivery and monitoring](#)

### Supplementary Planning Documents and Guidance

*Most relevant Camden Planning Guidance (CPGs):*

[Access for All CPG - March 2019](#)  
[Air Quality - January 2021](#)  
[Amenity - January 2021](#)  
[Basements - January 2021](#)  
[Biodiversity CPG - March 2018](#)  
[Community uses, leisure and pubs - January 2021](#)  
[Design - January 2021](#)  
[Developer Contribution CPG - March 2019](#)  
[Employment sites and business premises - January 2021](#)  
[Energy efficiency and adaptation - January 2021](#)  
[Planning for health and wellbeing - January 2021](#)  
[Public open space - January 2021](#)  
[Town centres and retail - January 2021](#)  
[Transport - January 2021](#)  
[Trees CPG - March 2019](#)  
[Water and flooding CPG - March 2019](#)

*Other guidance:*

[Bloomsbury Conservation Area appraisal and management strategy \(2011\)](#)  
**[Draft Camden Local Plan](#)**

The Council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for which consultation has now ended (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

## **6. ASSESSMENT**

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Design and Heritage
9	Impact on Neighbouring Amenity
10	Sustainability and Energy
11	Air Quality
12	Transport
13	Refuse and Recycling
14	Fire Safety
15	Employment and Training Opportunities
16	Community Infrastructure Levy (CIL)
17	Conclusion
18	Recommendation
19	Legal Comments
20	Conditions Planning Permission
21	Informatives Planning Permission
22	Conditions Listed Building Consent
23	Informatives Listed Building Consent

## 7. LAND USE

### ***Loss of Office Use***

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period.
- 7.2 The property has cellular/compartimentalised layouts over various split levels, which create an inefficient office plan form. There are also outdated services, poor energy efficiency, and not enough kitchenettes or WCs. The premises also have poor sustainability credentials, with a current EPC rating of D. Refurbishing the building to grade-A office space would involve high costs.

- 7.3 Changes to the demand for office space have resulted in a 'flight to quality' in the occupier market. The site does not meet market occupier requirements for office space, which calls for highly sustainable buildings with ample indoor and outdoor breakout and amenity space. Whilst a range of quality office space is needed in the borough to cater for different-sized businesses, and the lack of high-quality specifications does not make the premises inherently unsuitable for business use, the quality of the space does result in less ability to attract a tenant which has been demonstrated through a thorough marketing exercise.
- 7.4 The site is undesirable for a modern office occupier, as demonstrated by the 2+ years of marketing evidence provided by CBRE (the sales and leasing agent instructed to market the site). Given its large floorplates, the site is not deemed suitable for small businesses. No offers were received for any part of the buildings, demonstrating that they are unsuitable for a lower quantum of employment space.
- 7.5 CBRE marketed the site for office use via various platforms, including a visible letting board (since July 2021) and the online industry-wide Agents Society platform (September 2021). The marketing advertised "For Sale and to let – all enquires", inviting offers from all interested parties, including for smaller elements and offers on a 'cost mitigation' basis. However, the marketing failed to result in any formal offers being submitted. One of the most common responses was that the required quantum of space was unavailable across a single unbroken floorplate or to be provided over a smaller demise.
- 7.6 There were 105 enquiries, 17 of which were for smaller spaces (many in the 8800-1000 sqm region, and as small as 200 sqm). The reasons that these interested parties did not proceed with the space are set out below:
- unfavourable arrival experience;
  - focus on better quality opportunities;
  - 500 to 1,500 sqm of space over a single floor required;
  - too much work required to make into serviced offices;
  - self-contained space is required, and the business is too small for the whole area;
  - location not practical;
  - preference for Farringdon due to Crossrail;
  - no appetite for CAPEX works;
  - more creative space is desired; and
  - The location is too quiet.
- 7.7 The graph below outlines Bedford Row Vacancy rates over the last 10 years. It shows that from 2014-2020, rates remained low, sitting between 2 and 4%, except for an anomaly year in 2016 (likely explained by new space coming to market). This is in contrast to Bedford Row data in a post-Covid environment: from 2020-24 the vacancy rate has shot up to in excess of 14%, dropping at its lowest point to just under 12%, which by any market standards

demonstrates an oversupply. The vacancy rate today (14.3%) is higher than it has been at any time in the last decade, surpassing even the 14.1% seen in the immediate aftermath of the first Covid lockdown in Q1 2020. For context, the London-wide average vacancy rate is a much lower 9.2%, representing a 30-year high and evidence of city-wide vacancy and demand issues.

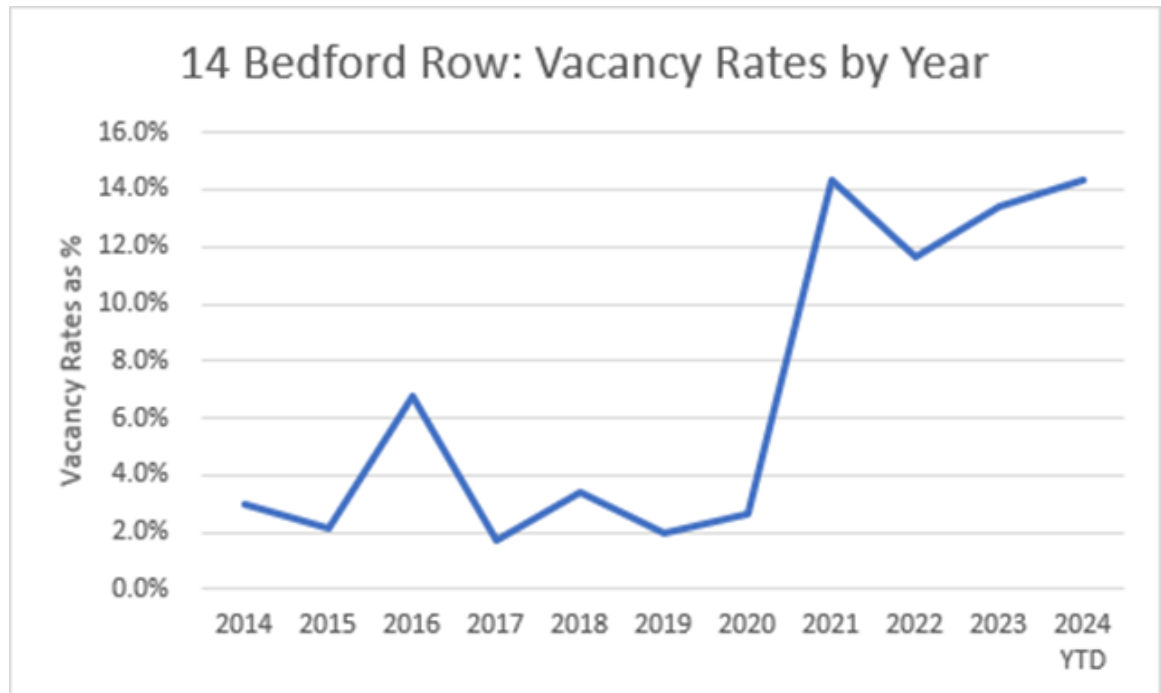


Figure 2 Vacancy rates on Bedford Row from 2014-2024

- 7.8 These fundamental changes within the occupier market, increasing vacancy rates of office space within this area and the awkward configuration of the buildings demonstrate why the site is not suitable for continued Office use.

#### ***Preferred Use for Residential***

- 7.9 Policy H1 (a) and (d) regard housing as the priority land use of the Local Plan and make housing the top priority when considering the future of unused and underused land and buildings. While Policy H1 makes housing the priority for land use when considering the future of unused and underused land and buildings, it is recognised that there are other development plan policies that support hotel use in this location. This includes London Plan policies, E10, SD4 and SD5, which support hotels within the CAZ. It is recognised that Policy H1 is worded in such a way as to require consideration of housing for the future of unused buildings, but does not prevent applications being submitted for other uses, and the Council would not have a strong policy basis for refusing an application at this site for an alternative use to housing.

### ***Proposed Hotel Use***

- 7.10 London Plan policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.
- 7.11 Serviced apartments are a use that are found within the CAZ. The London Plan Policy E10 endorses the provision of "smaller-scale" serviced accommodation in "other parts of the CAZ" (except in wholly residential streets or predominantly residential neighbourhoods) and "subject to the impact on office space and other strategic functions."
- 7.12 In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the importance of the visitor economy in Camden. It states that the Council will support tourism development and visitor accommodation. New, large-scale tourism development and visitor accommodation are expected in Central London. This can include serviced apartments that offer hotel-like amenities and services, but with more space and privacy like a traditional apartment.
- 7.13 The proposed hotel will have a GIA of 2,293 sqm and provide 65 bedrooms. A hotel of this size would be acceptable in this location within the Central London Area. It would bring benefits to the area in terms of attracting footfall, supporting local businesses in the service sector, and maintaining a level of vibrancy in an otherwise quiet and underused part of the Borough, particularly outside of office hours. The proposed use would also bring new jobs to the area. An employment and training benefits package has also been secured (see section 15 below). Condition 17 restricts the use of the site to a hotel to ensure that the rooms are not used as permanent self-contained housing and to protect the amenity of the area from other potential unsuitable uses.
- 7.1 Condition 15 requires the provision of 3 (5%) fully wheelchair-accessible rooms. This ensures that the internal layout of the building ensures sufficient provision for the needs of people with disabilities in accordance with the requirements of Policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.
- 7.2 Overall, the provision of hotel use at the site is acceptable.

## **8. DESIGN AND HERITAGE**

### ***Designated and non-designated heritage assets***

- 8.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to

preserving or enhancing the character and appearance of a conservation area.

8.2 The proposal also includes an application for Listed Building Consent. Section 16 of the Listed Buildings Act requires the local authority to 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 when considering an application for a listed building consent.

8.3 Any harm arising to heritage assets should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and importance must be given to any harm to designated heritage assets, and any harm identified should be outweighed in the balance by considerable public benefits.

8.4 Paragraph 208 of the NPPF states:

*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.*

8.5 There are also non-designated heritage assets in the area, such as various unlisted buildings that make a positive contribution to the Bloomsbury Conservation Area.

8.6 Any harm to non-designated heritage assets is a matter of planning balance as set out in paragraph 209 of the NPPF:

*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

8.7 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision-making. The design and heritage policies set out in the Camden Local Plan (CLP) (Policy D1 and D2) and London Plan (LP) policy on heritage (Policy HC1) all note the importance of character and appearance. The development plan focuses on the potential impact of new development on the built environment and archaeological remains, which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets.

### **Relevant heritage assets**

- 8.8 The original plot of 14 Bedford Row was developed in 1717-1718 and the building subsequently heavily altered by the Victorians. It was demolished in 1967 after damage from WW2 and rebuilt as a modern office accommodation with a Georgian-style facade in the same year. The building was Grade II listed in 1974, described on the register as “rebuilt in facsimile after wartime bombing”. The interiors are entirely modern and are of no significance. Historic England’s listing entry notes that it was included for group value as part of the terrace on the east side of Bedford Row.
- 8.9 The primary significance of the heritage asset is its front elevation, which includes the windows, front door, and porch design. The elevation is significant in 14 Bedford Row's group value. The Bloomsbury Conservation Area Appraisal lists 14 Bedford Row as a positive contributor.
- 8.10 By contrast, 12-13 and 14 Jockey’s Fields are unlisted and described in the conservation area appraisal as “lesser quality and a larger scale, out of keeping with the mews”. 12-13 Jockey’s Fields was built in 1969 in a modernist interpretation of a mews building designed as offices. It is considered to make a neutral contribution to the conservation area, and the rear elevation could be said to detract from the significance of the conservation area.

### **Impact of proposals**

- 8.11 There is no heritage reason to resist the change of use of this building from office to hotel. However, it is noted that the building is essentially a purpose-built office (albeit emulating a terraced house in terms of the front facade). The interior of the buildings has no significance. Still, the Bedford Row façade has a high degree of significance due to its role in the setting of adjacent listed buildings and its prominence in the conservation area.
- 8.12 The conversion would not involve any internal alterations that might impact the main façade of the building. Compared to the existing condition, minimal servicing/ventilation/extracts/lightwell storage is required for the 14 Bedford Row façade. The internal subdivisions (for ensembles, etc.), avoid cutting over any sash windows on the main façade.
- 8.13 Tidying up existing plant arrangements is acceptable, and there is no objection to creating green roofs on the lower parts of the site. Two plant locations on top of the roof are proposed, one on 12-13 Jockey’s Fields and the other on 14 Jockey’s Fields. The plant is within an acoustic screen and set-back to reduce visibility from street level. Views have been provided which show that the plant is not visible from Jockeys Fields street level. The 12-13 Jockey’s Field plant would be visible from Gray’s Inn Gardens in a very limited view that is still lower than the stairwell. The visibility in this view is not harmful to the conservation area. The alterations to the façade of the Jockey’s Field mews

building do not result in a substantial alteration to its appearance and, therefore, preserve the character and appearance of the area.

- 8.14 A courtyard is proposed by removing material from the link structure at the lower ground floor level. This allows light to enter the lower ground floor and ground floor rooms. Removing some of the link structures better reveals the closet wing of 14 Bedford Row, which is considered a minor heritage benefit.
- 8.15 In respect of all parts of the Act cited above, the proposals preserve the special architectural and historic interest of the listed building and the setting of its listed neighbours and that the proposals preserve the contribution which the



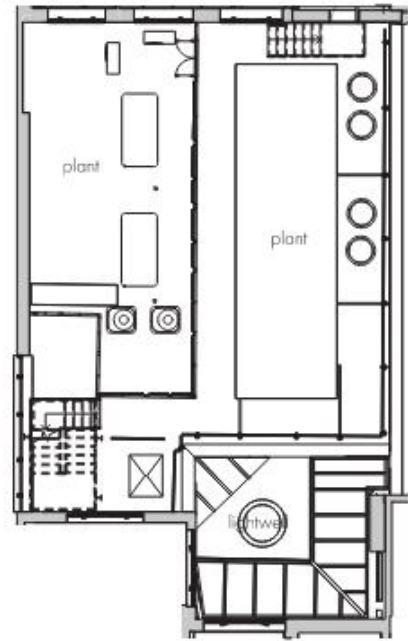
site as a whole makes to the character and appearance of the conservation area.



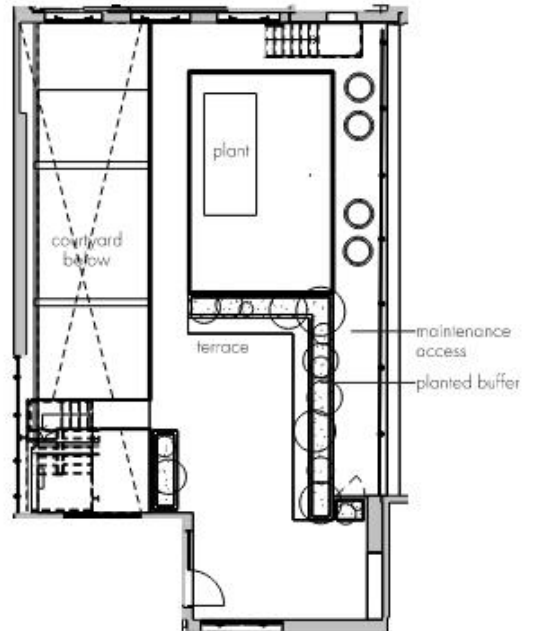
*Figure 4 Existing and proposed rear elevation of Bedford Row with link structure partially demolished and replaced*



Existing Roof of 'Link' Structure



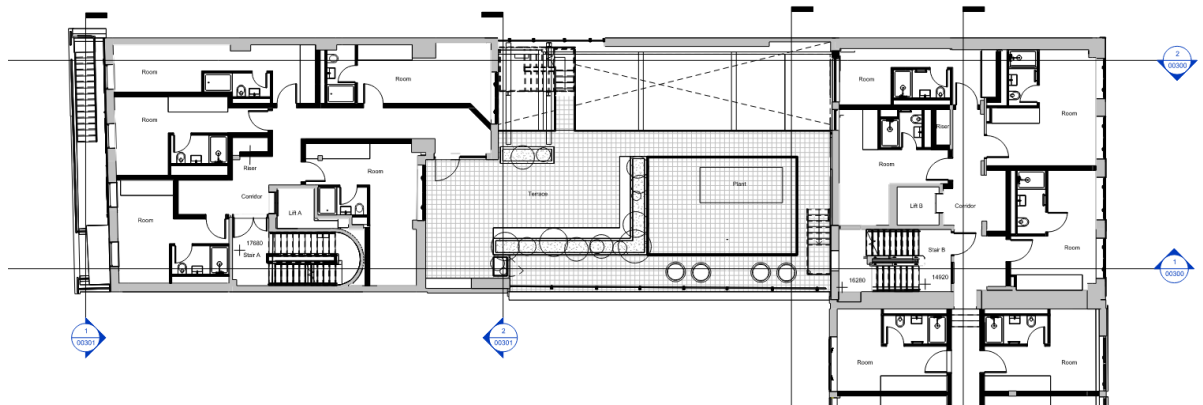
Proposed Roof of 'Link' Structure



*Figure 5 Proposed roof link structure*

## 9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy, and noise. Construction work impacts are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and proposed occupiers should be protected, and development, which causes an unacceptable level of harm to amenity, should be refused.
- 9.2 Since no extension is proposed for the building, the proposal would not reduce sunlight or the outlook to surrounding properties.
- 9.3 A roof terrace is proposed on the first floor flat roof of the existing link structure. Planting and seating are provided to limit the extent of the terrace area so that it does not cover the entire flat roof. This would act as a screen for the neighbouring residential property at number 13 Bedford Row. There would not be opportunities for directly overlooking neighbouring properties. This green buffer and seating would be secured by condition 11 to preserve neighbouring occupiers' privacy. Given its proximity to residential uses, the terrace would be conditioned only to be used from 9 a.m. to 11 p.m. daily.



*Figure 6 The extent of roof terrace at the bottom of the plan is limited by planting and seating*

- 9.4 Two new windows are proposed on the internal elevation of 12-13 Jockey's Fields. These will match the existing window lower down and use visually obscured glass on the lower panes to minimise privacy concerns. A condition would secure the lower panes as obscurely glazed.

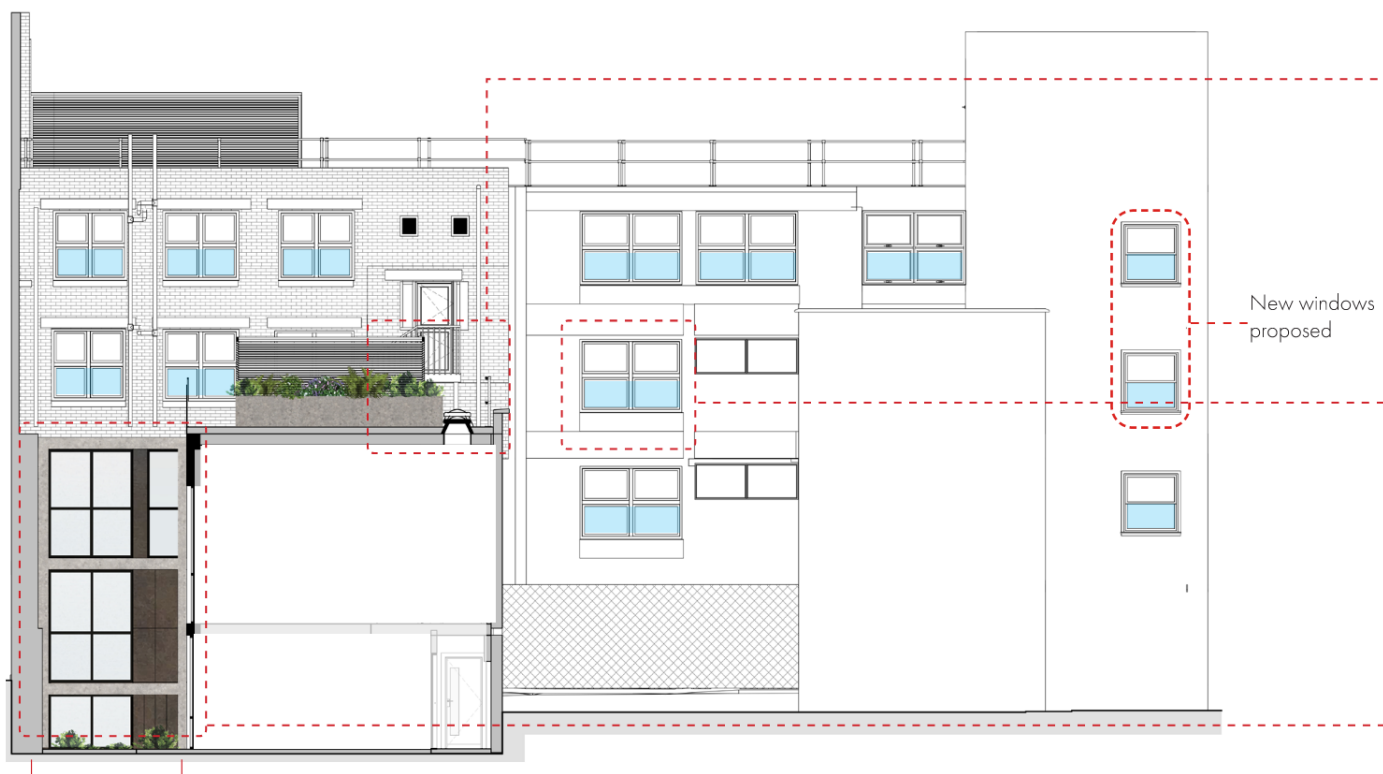


Figure 7. Proposed rear elevation of 12-14 Jockey Field's with new windows (top) and image of interior view from the proposed windows with bottom pane obscuring view (bottom)

### ***Noise impacts***

- 9.5 The proposal includes installing Air Source Heat Pumps (ASHPs) and air conditioning units.
- 9.6 A Plant Noise Assessment, in accordance with BS 4142, has identified the maximum acceptable noise levels that the proposed plant equipment may emit during both the daytime and nighttime periods. The Council's Environmental Health Noise Pollution Officer has reviewed the submitted Plant Noise Assessment and has confirmed that the proposals are acceptable in their impact and compliant with the development plan policies with regards to noise and vibration, subject to compliance with condition 5 to install anti-vibration measures and condition 4 to ensure the cumulative sound level from building services and fixed plant is 10dB(A), and by 15dB(A) where the source is tonal, at the nearest residential receptor.
- 9.7 It is considered that these conditions would ensure that the amenity of neighbouring residents is protected in terms of noise and vibration from the proposed rooftop plant. With the proposed mitigation measures, the noise levels identified should ensure a low likelihood of an adverse impact on amenity.

## **10. SUSTAINABILITY AND ENERGY**

- 10.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency and adopted the Camden Climate Action Plan 2020-2025, which aims to achieve a net zero carbon Camden by 2030.
- 10.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 10.3 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

### **Energy (CO2 reduction beyond Part L 2013)**

- 10.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2), and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and

the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

10.5 As shown in Table 1 (below), the proposed refurbishment for the new use will reduce emissions by 73% compared to the Part L 2021 baseline, and the proposed energy efficiency measures will reduce emissions by 12% and 61%, as described in the 'Be Lean' and 'Be Green' results section.

10.6 Therefore, the scheme significantly exceeds the 35% carbon reduction target over Part L building Regulations as set out in the London Plan Policy SI2. The scheme also meets and exceeds Policy CC3 requirements from the Camden Local Plan 2017.

#### Energy and carbon summary

10.7 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes set out in the London Plan and Camden Local Plan.

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	73%
Be lean stage (low demand): LP policy SI2	15%	12%
Heat Network/Active Savings (Be Clean)	0%	0%
Be green stage (renewables): CLP policy CC1	20%	61%

*Table 1 - Carbon saving targets and the scheme results*

#### Total carbon reductions

10.8 Reductions are measured against a baseline, the requirement set out in the Building Regulations. Major development should achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).

10.9 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 73% below Part L requirements, as shown in Table 1 above. A refurbishment scheme does not require a carbon offset payment to bring it to zero carbon.

#### Be lean stage (reduce energy demand) -

10.10 London Plan policy SI 2 sets a policy target of at least 15% reduction of carbon emissions beyond the Building Regulations baseline through reduced energy demand at the first stage of the energy hierarchy.

10.11 In this case, the development does not meet the policy target of 15%, reducing emissions by 12% at this stage. However, domestic hot water

accounts for most of the proposals energy demands. This results in limited potential to reduce carbon emissions for this type of development where domestic hot water demand significantly impacts energy performance. If the domestic hot water consumption is excluded from the calculation, the emissions savings obtained in the rest of the energy use from the efficiency measures, including measures such as energy-efficient lighting and ventilation at the Be lean stage, would be 25%. The applicant has also demonstrated that Waste Water Heat Recovery would not be suitable for the development. However, the Council's Sustainability Officer considers the shortfall in achieving the targeted reduction of 15% to be acceptable.

- 10.12 The applicant has submitted dynamic thermal modelling as part of the justification for proposing active cooling. Active cooling is only required in c.20% of the spaces within the property. The MVHR with air tempering principle is proposed to mitigate the overheating risks. The council's Sustainability Officer has reviewed the modelling and considers that due to the nature of the hotel with small single-aspect rooms, and considering the modelling results, it is accepted that active cooling is necessary on this site to meet the TM52 Thermal Comfort criteria.

Be clean stage (decentralised energy supply)

- 10.13 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network or establishing a new network where this is not possible.
- 10.14 In this case, the existing London heat map has been assessed and demonstrated that no existing local networks are present within the scheme's connectable range.

Be green stage (renewables)

- 10.15 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.16 In this case, the development exceeds the policy target of 20%, reducing emissions by 61% at this stage through renewables in compliance with the development plan. The proposal includes PV panels on the roof, and the extent has been maximised. Full details are secured by condition 6. The proposal also includes low-carbon heating like air-source heat pumps (ASHPs).

### Be seen (energy monitoring)

- 10.17 The London Plan policy SI 2 requires monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting, which would be secured as part of the S106 agreement.

### Sustainability (BREEAM)

- 10.18 Local Plan Policy CC2 point (h) expects all non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments. A BREEAM Pre-Assessment has been carried out, showing that all main targets are met and exceeded per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an ‘Excellent’ rating). The proposal reviewed currently achieves a score of 72.64%, which equates to an ‘Excellent’ rating. The Pre-Assessment report shows that:

- Energy - 10 out of 12 credits are achieved, which equates to 83% with a target of 60%;
- Water - 2 out of 2 credits are achieved, which equates to 100%, with the target being 60%,
- Materials - 7 out of 13 credits are achieved, which equates to 53.8%, with the target being 40%

- 10.19 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.

### ***Climate change adaption and sustainable design***

- 10.20 The proposal incorporates water-efficient design measures to minimise on-site water consumption. Condition 8 would secure the water usage target of 105 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.
- 10.21 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible.
- 10.22 The development proposals do not incorporate any increase in hardstanding areas. Including soft landscaping at the new courtyard and further planting on the new terrace would result in reduced surface water runoff from the site.
- 10.23 The proposals do not incorporate greywater harvesting. The existing layout presents challenges due to three linked structures offering little room for adjustments and modifications to the drainage setup for greywater recycling



inclusion. However, condition 7 is attached to require details of a rainwater harvesting system. The Council's Sustainability Officer has reviewed the proposal and supports the introduction of rainwater harvesting within the hotel.

- 10.24 The retrospective addition of further sustainable drainage systems is considered disproportionate to the scope of works, and the incorporation of attenuation, either above or below ground, would require significant structural strengthening works. Instead, it is proposed to reuse the existing drainage infrastructure where feasible.
- 10.25 The proposal provides green roofs and details of the substrate depth, species, and maintenance, secured by condition 9 to ensure their sustainability and biodiversity contribution.

### ***Summary***

- 10.26 The proposal satisfies policy objectives by optimising sustainability by incorporating best practice design, construction, and operation measures. Based on the above, it is considered the proposals accord policy and guidance regarding sustainability matters and is therefore acceptable in terms of sustainability.

## **11. AIR QUALITY**

- 11.1 The applicant has prepared an assessment of the air quality impacts associated with the proposed development's construction and operational phases.
- 11.1 The building currently passes the AQ Neutral Transport and Building emissions assessment. There is no new parking proposed, and the impact on traffic activity is expected to be small; therefore, the transport emissions are considered air quality neutral. The proposals are all electric (non-combustion), and the air quality neutral assessment shows that the proposed development will fully meet transport and building emissions requirements.
- 11.2 The air quality assessment shows that the proposed development will not introduce new receptors into an area where the UK air quality objectives are exceeded by the proposed opening year.
- 11.3 The results of the dust risk assessment indicate that construction activities, at worst, have a 'Medium' risk for demolition, and "Low" risk of dust soiling, and a 'Negligible' risk of health effects from PM10 at nearby receptors without mitigation. These impacts can be minimised through the implementation of appropriate mitigation measures. With mitigation in place, residual dust effects from construction will be minimal and are considered to be not significant.

- 11.4 Air quality impacts from construction and operational traffic are considered to be negligible due to the expected low number of vehicle movements during these phases of the proposed development. A condition would require the monitoring of construction-related impacts.
- 11.5 The Air Quality Report's conclusion stated, "The design team is exploring a ventilation strategy to protect new residents within the proposed development to PM2.5 concentrations in order to meet the future UK air quality target values and WHO guideline values." A condition is recommended to ensure that the ventilation strategy protects the amenity of the residents. The condition requires the submission of details of the mechanical inlet locations.
- 11.6 Overall, it is judged that the proposed development is consistent with Paragraph 180 of the NPPF, being appropriate for its location regarding its effects on the local air quality environment. It is also consistent with Paragraph 181, as it will not affect compliance with relevant limit values or national objectives. The proposed development is compliant with Camden Council Local Plan as well as with Policy S11 of the London Plan.

## **12. TRANSPORT**

- 12.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 12.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 12.3 It is the Council's intention to transform Holborn into a place for people with attractive, healthy, accessible, and safe streets for everyone, and ensure getting around by sustainable and healthy types of transport is easier and faster. This is being progressed through the Holborn Liveable Neighbourhoods project creating ideas such as widening pavements, making some are as car free, improving cycle routes, adding public spaces and plants and trees.
- 12.4 In terms of the wider context, [Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.
- 12.5 CTS priorities include:
- increasing walking and cycling;

- improving public transport in the Borough;
- reducing car ownership and use;
- improving the quality of our air; and
- making our streets and transport networks safe, accessible, and inclusive for all.

### ***Parking including car-free***

12.6 Policy T2 seeks to limit parking availability and require all new developments in the borough to be car-free.

12.7 The new hotel would be secured as car-free through a section 106 legal agreement, restricting the hotel from obtaining any on-street parking permits in connection with the development.

### 12.8 Disabled car parking

12.9 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential developments should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

12.10 Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site'.

12.11 Therefore, an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site is required.

12.12 Officers expect the vast majority of staff and visitors to travel to the site by sustainable modes of transport. However, there is the potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. This would put pressure on infrastructure, which has been provided primarily for local stakeholders. Officers, therefore, suggest that an additional EVCP (fast charger on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policy T1 if planning permission is granted.

### 12.13 CPZ Review

12.14 In 2023, a review of the CTS was undertaken and a delivery plan set out for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). This committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:

- Controlled Parking Zone (CPZ) hours extensions
- Workplace Parking Levy
- EVCP roll out.

12.15 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This could increase on-street parking pressure, which may drive demand for CPZ reviews. Considering the proposed development's scale and location, it is appropriate to request a contribution of £30,000 towards the CA-D CPZ review, which will likely take place in 2025/26.

#### 12.16 Coach parking and taxis

12.17 If coach access is required, drop off and pick up will be available on the single yellow line adjacent to 14 Bedford Row or on Bedford Row carriageway. The hotel may attract the arrival of coach parties (which may be outside the applicant's control) causing delays and safety issues on Bedford Row and in close vicinity of the hotel. We would, therefore, require a planning obligation to be secured by a legal agreement preventing coach party bookings and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Camden Local Plan Policy E3 (paragraph 5.60).

12.18 There is a taxi rank on Bedford Row able to accommodate three vehicles, and it is not considered that any further dedicated spaces would be required.

#### ***Cycle parking***

12.19 The Council requires high-quality cycle parking to be provided in accordance with Local Plan Policy T1, London Plan Policy T5 (1 space per 20 bedrooms long-stay and 1 space per 50 bedrooms short-stay), CPG Transport, and the London Cycling Design Standards (LCDS).

12.20 The current site does not include any dedicated cycle parking spaces. A dedicated long-stay cycle store is proposed on the ground floor, with step-free access to Jockey's Fields. Four long-stay cycle parking spaces would need to be provided for the proposed 65 room hotel in accordance with London Plan Policy T5 and final details of the exact location and type of cycle storage would be secured by condition 14. The requirement for short-stay cycle parking for the proposed use is two-cycle spaces. An off-site

contribution of £500 would be secured by S106 for 2 short stay cycle spaces. Council Officers would decide the best location for these cycle spaces.

- 12.21 The cycle parking proposals are compliant with Local Plan Policy T1 and London Plan Policy T5.

### ***Trip generation***

- 12.22 The site comprises three interconnected buildings with 2,358 sqm of currently unoccupied office space across six floors. TRICS database was interrogated to derive the anticipated total person trip rates generated by the proposed development. Analysis of the existing office use has been undertaken to compare this to the proposed apart-hotel use. Trip Rates and proposed person trips have been undertaken with the proposed based on the existing office floor space and the proposed 65 room apart-hotel.
- 12.23 The total number of person trips for the office in the AM peak period would be 35, with a GIA of 2,358 sqm. In the evening, this would be approximately 31 person trips. Over an average day, there could be up to 457 two-way person movements from the proposed apart-hotel.
- 12.24 The total person trips for the apart-hotel in the AM peak period would be 28 with 65 rooms. In the evening this would be approximately 30 person trips. Over an average day there could be up to 357 two-way person movements from the apart-hotel.
- 12.25 The above demonstrates that there will be a significant reduction in the number of trips from the site. The net change of the site suggests that there will be a reduction in the number of trips overall, with a reduction of 100 trips.
- 12.26 The majority of trips are projected to be taken by public transport and active travel. The anticipated high volume of walking trips will likely be made from Chancery Lane, Holborn and Farringdon station, the bus stops on Theobald's Road and High Holborn, and commercial, entertainment, shopping, and restaurant venues in Holborn.

### ***Highways works***

- 12.27 It is felt that significant damage to the public highway is unlikely during demolition and construction. A legal agreement secures a highway contribution of £20,000.

### ***Travel planning***

- 12.28 A Framework Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. However, the Travel Plan does not include a projected modal share for cycling and walking. Modal share projections for walking and cycling will

need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

- 12.29 A legal agreement will secure a Travel Plan covering an associated monitoring and measures contribution of £11,348.

***Managing and mitigating the impacts of construction***

- 12.30 Construction management plans demonstrate how developments will minimise impacts from moving goods and materials during the construction process (including any demolition works). A Construction Management Plan was submitted; however, the document does not adhere to the Council's guidance.
- 12.31 The site is located near Theobald's Road, forming part of the strategic road network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day from Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to various amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.
- 12.32 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the construction's impacts on the transport network. The site is within the Cumulative Impact Area (CIA), where Saturday work is not permitted unless agreed with Camden Council.
- 12.33 A more detailed CMP document will also be secured by legal agreement in accordance with Local Plan Policy A1. This will be prepared using the Council's CMP proforma. The applicant is requested to visit LB Camden's published guidance on construction management.
- 12.34 The development will require input from officers at the demolition and construction stage. This will relate to the development and assessment of the CMP and its ongoing monitoring and enforcement during demolition and construction.
- 12.35 Implementation support contributions of £10,116 and construction impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1.
- 12.36 The contractor must register the works with the Considerate Constructors Scheme and adhere to the CLOCS standard for Construction Logistics and Community Safety.

### ***Servicing***

- 12.37 Local Plan Policy A1 seeks to manage the impact of development by transport impacts such as servicing. Policy A4 states that conditions will usually be applied to require servicing to take place between the hours of 08:00 to 20:00. Developments requiring deliveries outside of these times will need to demonstrate there will be no adverse impact in an acoustic report. Policy T4 requires developments of over 2,500 sqm that are likely to generate significant movement by road to provide a Delivery and Servicing Plan. While the development is under this threshold and not expected to generate significant movements, a draft Delivery and Servicing Plan accompanies this application, which would be secured by legal agreement.
- 12.38 The proposed development has a potential to generate six servicing trips per day. Deliveries are proposed to take place either to the front of the development along Bedford Row at the single yellow line, or to the rear along Jockey's Fields. Any deliveries or refuse collections from Jockey's Fields will be specifically carried out by 6.7m long vehicles. The swept paths analysis for the vehicles accessing the proposed servicing locations was provided and is considered acceptable.
- 12.39 The number of service vehicle trips is anticipated to reduce compared to the existing office use. Site management will liaise with occupiers to manage the arrival of deliveries, aiming to avoid deliveries during peak hours on the highway network and peaks in delivery activity on site.

### ***Pedestrian, cycling and environmental improvements***

- 12.40 The Council is developing proposals to transform the Holborn area's public realm and make many streets more attractive to pedestrians and cyclists. The estimated cost of delivering these proposals, which will be delivered under the Holborn Liveable Neighbourhood (HLN) scheme, is estimated at circa £40M.
- 12.41 The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. Construction of the HLN scheme will take place as funds become available. Implementing some changes to roads in the area is likely to start in 2024 using secured funding, with each subsequent phase of construction subject to financial approval as funding becomes available.
- 12.42 The development would generate a projected increase in cycle trips. The Travel Plan and the need for pedestrian, road safety and public realm enhancements would further promote cycling and walking. We will seek a contribution of £8,000 towards several improvement schemes to enhance the pedestrian and cycling environment in the vicinity of the site.

### ***Micromobility improvements***

12.43 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. The STAL analysis shows grades between 4 and 5 throughout the area, which indicates improvement opportunities, considering our aspiration (and target) for the STAL score to be 6b. Officers anticipate significant demand for more shared mobility parking bay capacity to be provided in the area should planning permission be granted. A contribution of £2,000 for micromobility improvements would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for parking dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

### ***Summary***

12.44 Overall, the proposal is acceptable in terms of transport implications. It is car-free and is located in a highly sustainable and accessible location that is in line with planning policy. The proposal will not generate a significant level of vehicular traffic and, as such, will not significantly impact the capacity of the surrounding highway network. Conveniently accessible long-stay and short-stay cycle parking would be provided.

## **13. REFUSE AND RECYCLING**

13.1 Policy CC3 (Waste) states that the Council will seek to make Camden a low-waste borough. Part (d) of the policy states that we will ensure that developments include facilities for storing and collecting waste and recycling. A large waste storage room on the ground floor facing Jockey's Fields will store the site's recycling and waste bins for collection.

13.2 The total waste generated per week for the development is expected to be 9,000 litres, including general and recyclable waste. The waste split is proposed to be 60% general refuse and 40% recyclable. The expected waste demand for each stream and the required refuse storage are provided in the table below.

13.3 The assumed split of refuse and recycling is 40:60, with refuse and recycling in 1,100-litre bins for the hotel. The provision of 2 refuse bins and 3 dry mixed dry recyclable bins (1,100 litre) for the proposed hotel use is based on uncompacted waste and will offer three-day waste storage. The size and step-free access to the street from this space are supported. Condition 20 requires the waste storage to be provided before the commencement of the use hereby permitted and retained for the duration of the development.



## **14. FIRE SAFETY**

- 14.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 14.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The Fire Safety London Plan Guidance accompanies the London Plan policy. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 through its use of fire safety professionals and that the planning officer must ensure the information has been provided. The review of the fire safety measures and their compliance with building regulations and standards will still take place at the Building Control stage. It shall not be undertaken by planning officers.
- 14.3 The application is accompanied by a “Fire Safety Statement” document outlining the critical fire safety features incorporated within the development. The submitted document has been prepared by Fire Safety Statement and prepared by Semper, a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures.
- 14.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5.

## **15. EMPLOYMENT AND TRAINING OPPORTUNITIES**

- 15.1 Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to secure a successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents and recognise the importance of other employment-generating uses, including retail, education, health, markets,

leisure and tourism. The Council's Inclusive Economy Team have been consulted on the application, and their comments are incorporated below.

- 15.2 The Council will expect developers to assist with training and employment initiatives via section 106 agreements where the development impacts the availability of jobs for Camden residents. The Council will expect schemes of 1,000 (GIA) or larger to provide employment or training initiatives secured through a section 106 agreement with the Council unless evidence demonstrates that the scheme is below the £3m build cost trigger. The build costs in this case are estimated at £5.5 million.
- 15.3 The council may seek a financial contribution to assist residents in receiving training in the skills that would enable them to access the jobs created by the new development. This contribution will be held by the Council and used to support activities that create or promote opportunities for employment or training.
- 15.4 Approximately 32.5 full-time jobs would be created during the operational phase. This is calculated as the number of bedrooms (65) x 0.5 [number of employees per bedroom] = 32.5 full-time jobs created.
- 15.5 The training and skills payment of £9,553.58 is calculated as follows.  $32.5 \times 21\%$  [% of Camden residents who work in Camden] x 35% [% of employees requiring training] x £3,995 [£ per employee requiring training] = £9,553.58.
- 15.6 Sections 54- 60 of the CPG Employment Sites and Business Premises expect a financial contribution where there is a loss of employment space/office over 500 sqm. The number of full-time (FT) jobs created through the hotel use would be fewer than if the building remained in office use. The contribution is based on the difference between the number of jobs expected to be supported if a building remained in its existing employment-generating use and the number of jobs expected to be generated by the hotel use. The compensatory payment of £62,921.25 is calculated below.
- 15.7 The Net Internal Area has been used for this calculation rather than the GIA because much of the premises is made up of stair cores, reception, and circulation space. This contributed to the building's inability to attract tenants due to its poor efficiency.
- 15.8 No. of full-time jobs expected in current employment use (office) is calculated as the NIA divided by average space per worker:  $1502 \text{ sqm} / 12 = 125 \text{ FT jobs}$
- 15.9 Net jobs lost is calculated as FT jobs expected in current employment (office) use minus FT jobs in new use (hotel):  $125 - 50 = 75 \text{ FT jobs}$ .

- 15.10 The number of net jobs lost expected to be filled by Camden residents is calculated as a net loss of FT jobs x % of Camden residents who work in Camden):  $75 \times 21\% = 16$  jobs.
- 15.11 The cost of retraining and supporting the number of Camden residents expected to be employed in former use:  $16 \times \text{£}3,995 = \text{£}62,921.25$
- 15.12 In terms of apprenticeships during the construction phase, as the build cost for this scheme exceeds £3 million (total build cost of £5.5 million), the applicant must recruit 1 construction apprentice paid at least London Living Wage per £3 million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Whilst the build costs are £5.5 million, the applicant has agreed to 3 construction apprentices and a combined support fee of £5,100. Construction apprentices should be recruited through the Council's King's Cross Construction Skills Centre. The construction apprenticeships and contributions would be secured through a s106 legal agreement.
- 15.13 Regarding Construction Work Experience Placements, there is an expectation for the applicant to provide a set number of work experience placements (being one placement per 500m<sup>2</sup> of employment floorspace) of not less than 2 weeks each, to be undertaken throughout the development, and to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG. The hotel provides 2,293 sqm C1 floorspace, equating to 4.5 construction work experience placements. The applicant has agreed to 5 construction work experience placements, which will be secured through a section 106 legal agreement.
- 15.14 Regarding Local Recruitment, Camden's standard local recruitment target is 20%. The applicant should work with the Kings Cross Construction Skills Centre to recruit for vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 15.15 Regarding Local Procurement, the applicant would also sign up for the Camden Local Procurement Code (to be secured as part of the section 106 legal agreement), as per section 61 of the Employment Sites and Business Premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction contract. Spending a significant proportion of the total construction build cost on supplies/suppliers and sub-contractors within the Camden borough area will support local businesses and the overall functioning of the local economy.
- 15.16 The proposal also presents opportunities to secure end-use / occupation phase benefits. In this regard, a Section 106 legal agreement would secure 3 x end-use apprenticeships (rolling term) for the hotel operation.

15.17 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:

- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives

## 16. COMMUNITY INFRASTRUCTURE LEVY (CIL)

16.1 The proposed development is liable for both Mayoral and Camden CIL. The development would uplift 2,293 sqm GIA (Class C1 hotel accommodation). It is noted that the CIL Form signed and dated 3<sup>rd</sup> May states 2,256 sqm and this would need to be clarified when the CIL In providing the below draft calculation, the retained or demolished sqm GIA has not been applied, as these values need to be evidenced with business rates, covering 6 months over 3 years before the decision. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule. Based on the Mayor's CIL2 and Camden's CIL charging schedules and the information submitted, the charges would be approximately £6,583.55

### Mayor CIL2

Hotel - £140 sqm (Central London and Isle of Dogs)

### Camden

Hotel - £110 sqm (Zone A – Central)

- Camden CIL: £2,788.23
- Mayoral CIL: £3,706.32
- **Total CIL: £6,583.55**

16.2 The above is an estimate only and would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

## 17. CONCLUSION

17.1 The application is to change the use of the existing office buildings at 14 Bedford Row and 12-13 and 14 Jockey's Fields to a Class C1 apart-hotel use.

17.2 This application meets the policy tests of LBC LP Policy E2, which seeks to protect existing employment space within the borough. The two-plus years of marketing evidence demonstrate a lack of market demand. The site's deep,

cellular floorplates, lack of end-of-journey facilities, and inaccessibility contribute to this lack of interest. Despite a marketing period since September 2021, the site has been unable to attract prospective office tenants.

- 17.3 The London Plan and Local Plan support the delivery of visitor infrastructure within the Central Activities Zone, which is near many destinations and attractions.
- 17.4 The proposed high-quality and sustainable aparthotel will bring a vacant listed building into use. The proposal will enhance and optimise the buildings' environmental performance by retaining and upgrading the building fabric and services strategy within the building envelope as part of a retro-first approach to minimising embodied and operational carbon.
- 17.5 The development would not result in undue harm to neighbouring amenity, the local transport network, or infrastructure subject to the recommended conditions and S106 obligations.
- 17.6 Paragraph 10 of the NPPF states that there is a presumption in favour of sustainable development. The dimensions of sustainable development are economic, social, and environmental, and they should be sought jointly. The proposed development would result in benefits through all three strands of sustainable development without any adverse impacts significantly or demonstrably outweighing them. The proposal is considered to be a favourable sustainable development in accordance with relevant national and regional policy, the Camden Local Plan, Camden Planning Guidance, and other supporting policy guidance.

## **18. RECOMMENDATION**

- 18.1 Grant conditional Planning Permission and conditional Listed Building Consent subject to a Section 106 Legal Agreement with the following heads of terms:

### Energy and sustainability

- Energy Plan
- Sustainability plan (BREEAM compliance) – secure BREEAM Excellent rating (Overall score of 72.64%, 83% for Energy, 100% for Water, 53.8% for Materials)

### Transport

- Car-free development
- Travel Plan and associated monitoring and measures contribution of £11,348.
- Off-site contribution of £4,000 for a disabled parking space.

- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-D CPZ review contribution of £30,000.
- Off-site cycle parking contribution of £500 towards short-stay cycle parking.
- No coach party bookings and a ban on customers being picked up or dropped off by coach at any time outside the hotel.
- Construction management plan (CMP) CMP implementation support contribution of £10,116 and CMP Impact Bond of £16,000.
- Highway works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £8,000.
- Micro-mobility improvements of £2,000
- Delivery and Servicing Management Plan

Employment and training

- Payment for loss of employment generating use £62,921.25
- Payment for local skills and training of £9,553.58
- 3 x end-use apprenticeships (rolling term) for the hotel operation.
- 3 construction apprentices and a combined support fee of £5,100.
- 5 construction work experience placements
- The applicant should work with the Kings Cross Construction Skills Centre to recruit for vacancies
- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives

**19. LEGAL COMMENTS**

19.1 Members are referred to the Legal Division's note at the Agenda's start.

**20. CONDITIONS PLANNING PERMISSION 2024/1810/P**

1	<p><b>Three years from the date of this permission</b></p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
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## Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Planning Statement, prepared by Savills; Cover Letter, prepared by Savills; Marketing Evidence, prepared by CBRE; Interest Schedule, prepared by CBRE; Design and Access Statement, prepared by White Red Architects; Existing and Proposed Plans, prepared by White Red Architects; Heritage Statement, prepared by Donald Insall Associates; Acoustic Report, prepared by Venta; Air Quality Assessment, prepared by RWDI; Construction Management Plan, prepared by Motion; Energy Statement, prepared by EnergyLab; Sustainability Statement (incl. BREEAM Pre-Assessment), prepared by EnergyLab; Landscaping Scheme, prepared by White Red Architects; Transport Assessment (incl. Travel Plan and Delivery and Servicing Management Plan), prepared by Motion; Sustainable Drainage Systems (SuDS) Strategy, prepared by Elliot Wood; Fire Safety Statement, prepared by Semper; Statement of Community Involvement, prepared by Concilio.

5491\_P00001\_P01\_Site Location Plan; 5491\_P01302\_P01\_Existing Section EE; 5491\_P01099\_P01\_Existing Basement Plan; 5491\_P01100\_P01\_Existing Ground Floor; 5491\_P01101\_P01\_Existing First Floor; 5491\_P01102\_P01\_Existing Second Floor; 5491\_P01103\_P01\_Existing Third Floor; 5491\_P01104\_P01\_Existing Fourth Floor; 5491\_P01105\_P01\_Existing Roof Plan; 5491\_P01200\_P01\_Existing Bedford Row Elevation; 5491\_P01201\_P01\_Existing Jockeys Fields Front Elevation; 5491\_P01202\_P01\_Existing Jockeys Fields Rear Elevation; 5491\_P01300\_P01\_Existing Sections AA and BB; 5491\_P01301\_P01\_Existing Sections CC and DD

5491\_P12099\_P01\_Demolition Basement Plan; 5491\_P12100\_P01\_Demolition Ground Floor; 5491\_P12101\_P01\_Demolition First Floor; 5491\_P12102\_P01\_Demolition Second Floor; 5491\_P12103\_P01\_Demolition Third Floor; 5491\_P12104\_P01\_Demolition Fourth Floor; 5491\_P12105\_P01\_Demolition Roof Plan; 5491\_P12200\_P01\_Demolition Bedford Row Elevation; 5491\_P12201\_P01\_Demolition Jockeys Fields Front Elevation; 5491\_P12202\_P01\_Demolition Jockeys Fields Rear Elevation; 5491\_P12300\_P01\_Demolition Sections AA and BB; 5491\_P12301\_P01\_Demolition Sections CC and DD; 5491\_P12302\_P01\_Demolition Section EE

5491\_P00099\_P01\_Proposed Basement Plan.; 5491\_P00100\_P01\_Proposed Ground Floor; 5491\_P00101\_P01\_Proposed First Floor; 5491\_P00102\_P01\_Proposed Second Floor; 5491\_P00103\_P01\_Proposed Third Floor; 5491\_P00104\_P01\_Proposed Fourth Floor; 5491\_P00105\_P01\_Proposed Roof Plan; 5491\_P00200\_P01\_Proposed Bedford Row Elevation;

	<p>5491_P00201_P01_Proposed Jockeys Fields Front Elevation;  5491_P00202_P01_Proposed Jockeys Fields Rear Elevation;  5491_P00300_P01_Proposed Sections AA and BB  5491_P00301_P01_Proposed Sections CC and DD</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p><b>Materials to Match Existing</b></p> <p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p><b>External Noise levels</b></p> <p>The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
5	<p><b>Anti-vibration isolators and fan motors</b></p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration-isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
6	<p><b>Photovoltaic cells</b></p> <p>Prior to commencement of development, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority</p>



	<p>in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
7	<p><b>Rainwater harvesting</b></p> <p>Prior to the occupation of the aparthotel rooms hereby approved, details of rainwater recycling proposals should be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
8	<p><b>Water efficiency</b></p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
9	<p><b>Green roof details</b></p> <p>Prior to commencement of development, full details in respect of the living roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority. The details shall include:</p> <ul style="list-style-type: none"> <li>i. a detailed scheme of maintenance</li> <li>ii. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials use</li> <li>iii. full details of planting species and density</li> </ul>

	<p>The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2, and A3 of the London Borough of Camden Local Plan 2017.</p>
10	<p><b>Hours of use of the roof terrace</b></p> <p>The first-floor flat roof of the link structure, as shown on drawing number 5491_P00101_P01, shall not be used as a roof terrace, sitting-out area or other amenity space outside of the times of 9 am to 11 pm daily (it can be used in the event of an emergency).</p> <p>Reason: To protect the amenity of adjoining occupiers and the area in accordance with policy A1 of the Camden Local Plan 2017.</p>
11	<p><b>Installation of landscaping and seating privacy buffer</b></p> <p>The seating and planting, as shown on 5491_P00101_P01, shall be installed in accordance with the approved drawing prior to first use of the terrace and shall be permanently maintained and retained as such thereafter.</p> <p>Reason: To protect the amenity of adjoining occupiers in terms of privacy in accordance with policy A1 of the Camden Local Plan 2017.</p>
12	<p><b>Mechanical ventilation</b></p> <p>Prior to commencement of development excluding demolition and site preparation works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1</p>
13	<p><b>Construction-related impacts – Air Quality Monitoring</b></p>

	<p>Air quality monitoring should be implemented on-site. No development shall take place until:</p> <ol style="list-style-type: none"> <li>1. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</li> <li>2. a confirmation email should be sent to <a href="mailto:airquality@camden.gov.uk">airquality@camden.gov.uk</a> no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</li> <li>3. prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.</li> </ol> <p>The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
14	<p><b>Cycle parking details</b></p> <p>Prior to occupation of the apart hotel rooms hereby approved, details of secure and covered cycle storage area for at least 4 cycles shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation of any of the new hotel bedrooms, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
15	<p><b>Obscure glazing</b></p>

	<p>Prior to the occupation of the development hereby permitted, the bottom pane of the two new windows on the rear elevation of 12-14 Jockey Field's shall be fitted with obscure glass with restricted opening (as shown on drawing number 5491_P00202_P01), and the windows shall be permanently maintained and retained as such thereafter.</p> <p>Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with policy A1 of the Camden Local Plan 2017.</p>
16	<p><b>Wheelchair accessible rooms</b></p> <p>Prior to the commencement of use of the hotel, there shall be the provision of 3 (5%) fully wheelchair accessible rooms.</p> <p>Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.</p>
17	<p><b>Premises to only be used as hotel</b></p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall not be used other than as a hotel within a single planning unit.</p> <p>Reason: In order to ensure that the site is not used as permanent residential accommodation and to protect the amenities of the surrounding area in accordance with policies A1, A4, H6, and D1 of the London Borough of Camden Local Plan (2017).</p>
18	<p><b>Number of hotel bedrooms</b></p> <p>The development hereby permitted shall not comprise more than 65 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.</p> <p>Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan (2017).</p>
19	<p><b>Fire safety</b></p>

	<p>The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by Fire Safety Statement, prepared by Semper dated 22<sup>nd</sup> April 2024.</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.</p>
20	<p><b>Waste and recycling storage to be implemented</b></p> <p>The waste and recycling storage shown on the approved plans 5491-WRA-ZZ-00-DR-A-P00100] shall be provided prior to the commencement of the use hereby permitted, and shall thereafter be retained for the duration of the development.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the in accordance with policies CC5, D1 and D2 of the Camden Local Plan 2017.</p>

## 21. **INFORMATIVES PLANNING PERMISSION 2023/3970/P**

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
2	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p>

	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
5	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
6	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
7	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>
8	<p>Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "<a href="http://nrmm.london/">http://nrmm.london/</a>".</p>

9	We recommend that hotel bedrooms shall be designed and located such that the unoccupied noise levels do not exceed the criteria specified in Table H.1 Airborne Sound Insulation and Table H.3 Indoor ambient noise level ranges for hotel bedrooms of BS8233:2014.
10.	You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.

**22. CONDITIONS LISTED BUILDING CONSENT 2024/1764/L**

1	<p><b>Implementation</b></p> <p>The works hereby permitted shall be begun not later than the end of three years from the date of this consent.</p> <p>Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>
2	<p><b>Approved drawings</b></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>Planning Statement, prepared by Savills; Cover Letter, prepared by Savills; Marketing Evidence, prepared by CBRE; Interest Schedule, prepared by CBRE; Design and Access Statement, prepared by White Red Architects; Existing and Proposed Plans, prepared by White Red Architects; Heritage Statement, prepared by Donald Insall Associates; Acoustic Report, prepared by Venta; Air Quality Assessment, prepared by RWDI; Construction Management Plan, prepared by Motion; Energy Statement, prepared by EnergyLab; Sustainability Statement (incl. BREEAM Pre-Assessment), prepared by EnergyLab; Landscaping Scheme, prepared by White Red Architects; Transport Assessment (incl. Travel Plan and Delivery and Servicing Management Plan), prepared by Motion; Sustainable Drainage Systems (SuDS) Strategy, prepared by Elliot Wood; Fire Safety Statement, prepared by Semper; Statement of Community Involvement, prepared by Concilio.</p> <p>5491_P00001_P01_Site Location Plan; 5491_P01302_P01_Existing Section EE; 5491_P01099_P01_Existing Basement Plan; 5491_P01100_P01_Existing Ground Floor; 5491_P01101_P01_Existing First Floor; 5491_P01102_P01_Existing Second Floor;</p>

	<p>5491_P01103_P01_Existing Third Floor; 5491_P01104_P01_Existing Fourth Floor; 5491_P01105_P01_Existing Roof Plan;  5491_P01200_P01_Existing Bedford Row Elevation;  5491_P01201_P01_Existing Jockeys Fields Front Elevation;  5491_P01202_P01_Existing Jockeys Fields Rear Elevation;  5491_P01300_P01_Existing Sections AA and BB;  5491_P01301_P01_Existing Sections CC and DD</p> <p>5491_P12099_P01_Demolition Basement Plan;  5491_P12100_P01_Demolition Ground Floor;  5491_P12101_P01_Demolition First Floor;  5491_P12102_P01_Demolition Second Floor;  5491_P12103_P01_Demolition Third Floor;  5491_P12104_P01_Demolition Fourth Floor;  5491_P12105_P01_Demolition Roof Plan;  5491_P12200_P01_Demolition Bedford Row Elevation;  5491_P12201_P01_Demolition Jockeys Fields Front Elevation;  5491_P12202_P01_Demolition Jockeys Fields Rear Elevation;  5491_P12300_P01_Demolition Sections AA and BB;  5491_P12301_P01_Demolition Sections CC and DD;  5491_P12302_P01_Demolition Section EE</p> <p>5491_P00099_P01_Proposed Basement Plan;  5491_P00100_P01_Proposed Ground Floor;  5491_P00101_P01_Proposed First Floor; 5491_P00102_P01_Proposed Second Floor; 5491_P00103_P01_Proposed Third Floor;  5491_P00104_P01_Proposed Fourth Floor;  5491_P00105_P01_Proposed Roof Plan; 5491_P00200_P01_Proposed Bedford Row Elevation; 5491_P00201_P01_Proposed Jockeys Fields Front Elevation; 5491_P00202_P01_Proposed Jockeys Fields Rear Elevation; 5491_P00300_P01_Proposed Sections AA and BB  5491_P00301_P01_Proposed Sections CC and DD</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p> <p>Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.</p>
3	<p><b>New work to match original</b></p> <p>All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.</p>

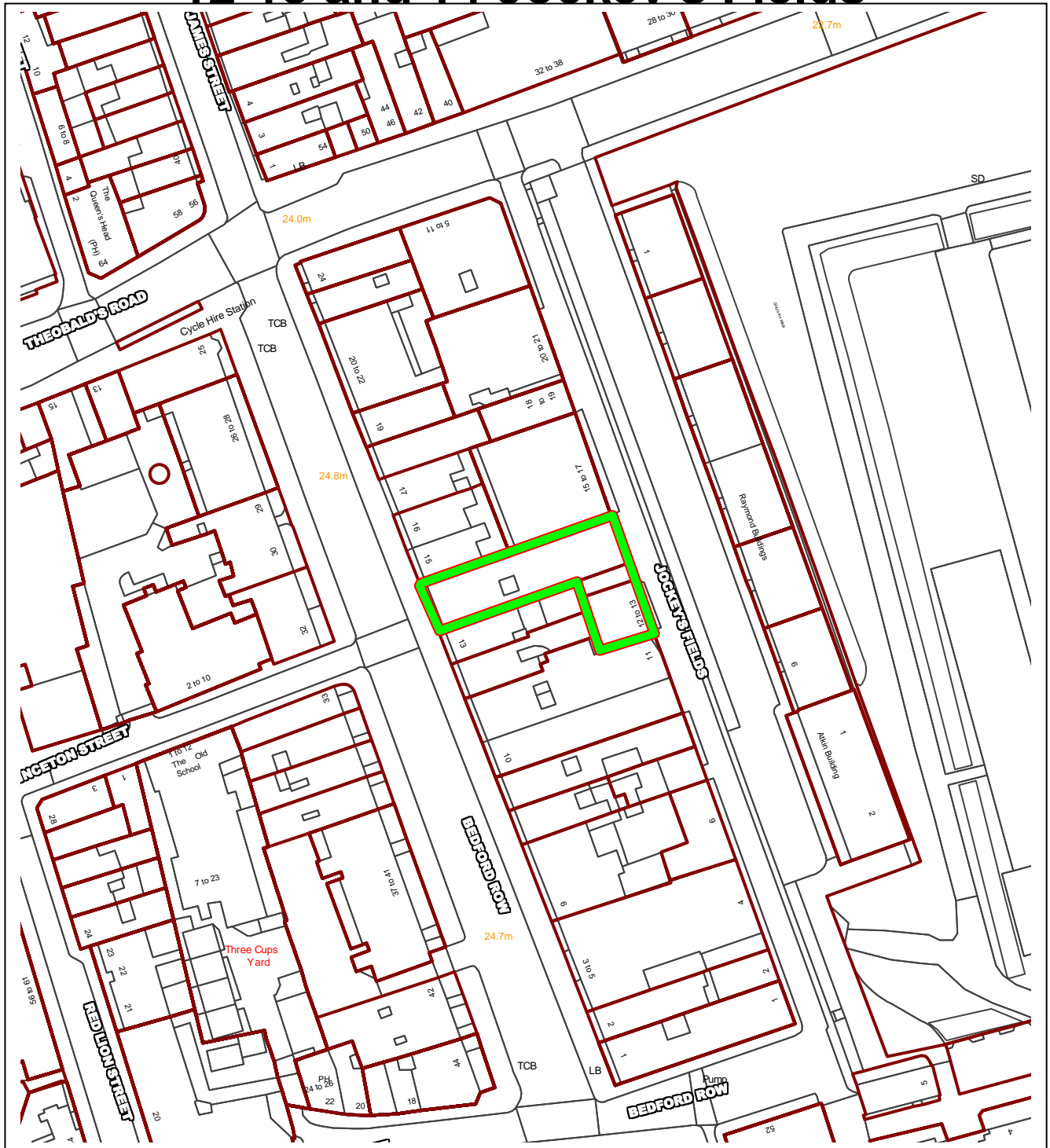


	Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of Policy D2 of the Camden Local Plan 2017.
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**23.      **INFORMATIVES LISTED BUILDING CONSENT 2024/1764/L****

1.	You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
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# Site Location Plan 14 Bedford Row, 12-13 and 14 Jockey's Fields



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# Planning Committee

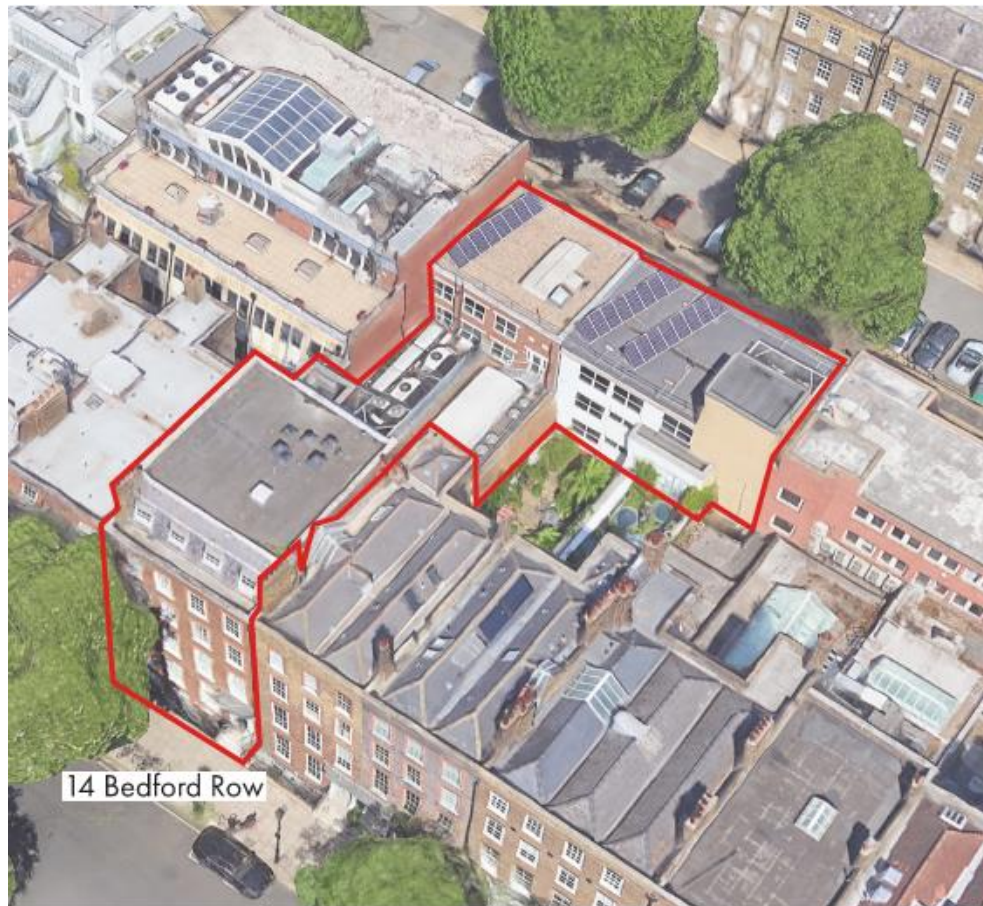
1<sup>st</sup> of August 2024

# 2024/1810/P

14 Bedford Row, 12-13 and 14  
Jockey's Fields  
Holborn



# Aerial views of the site



# Rebuilt Grade II Listed front elevation of 14 Bedford Row



Rebuilt Elevation (Completed 1967)

# Views of interior layout



Generic office space looking onto Bedford Row



Internal Stair



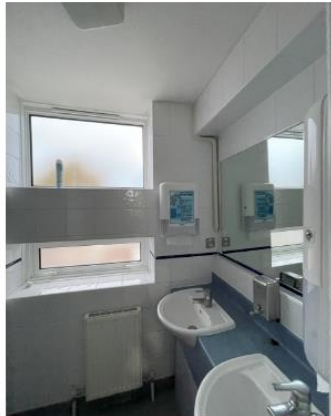
Plant equipment on 'link' structure roof



Corridor through 'link' structure



Level 04 mansard room



Level 02 Male WC



Access to existing lightwell



Ground Floor conference room



Internal courtyard



Roof of glazed 'link'



# Existing (top) and proposed (bottom) Jockey Fields elevation



Existing Rear Elevation - Jockey's Fields



Proposed Front Elevation - Jockey's Fields

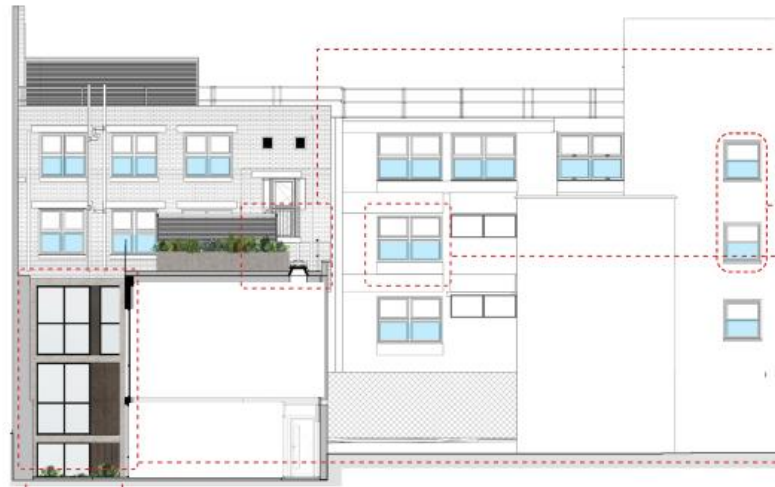
# The existing (top) and proposed internal rear elevation (bottom) of Jockey Field's



Existing Internal Rear Elevation - Jockey's Field



Set-back green buffer



3350mm  
New Lightwell  
Proposed Internal Rear Elevation - Jockey's Field



New windows proposed

High quality visually obscured glazing

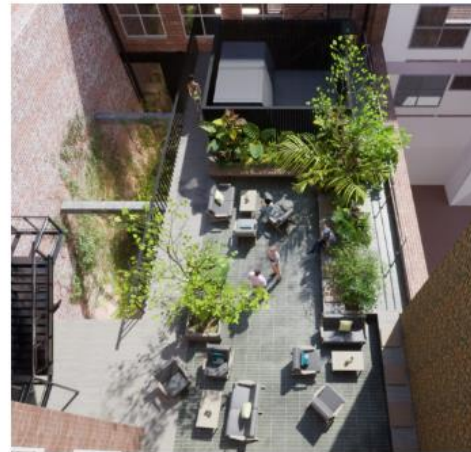
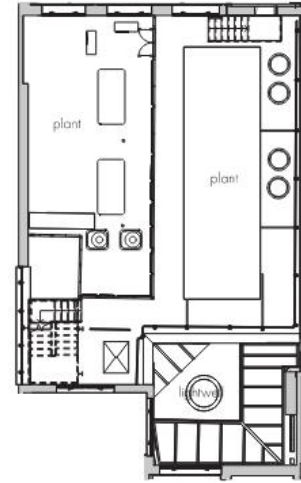


Proposed Courtyard

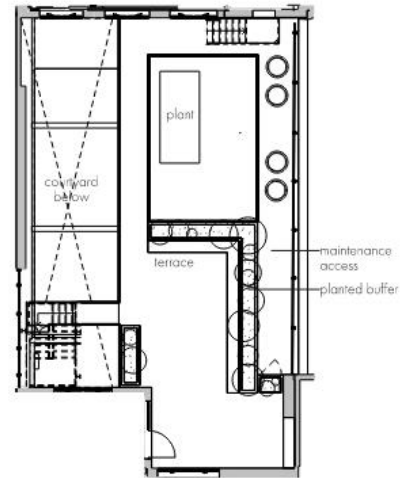
# Existing and proposed roof of link structure with new terrace



Existing Roof of 'Link' Structure



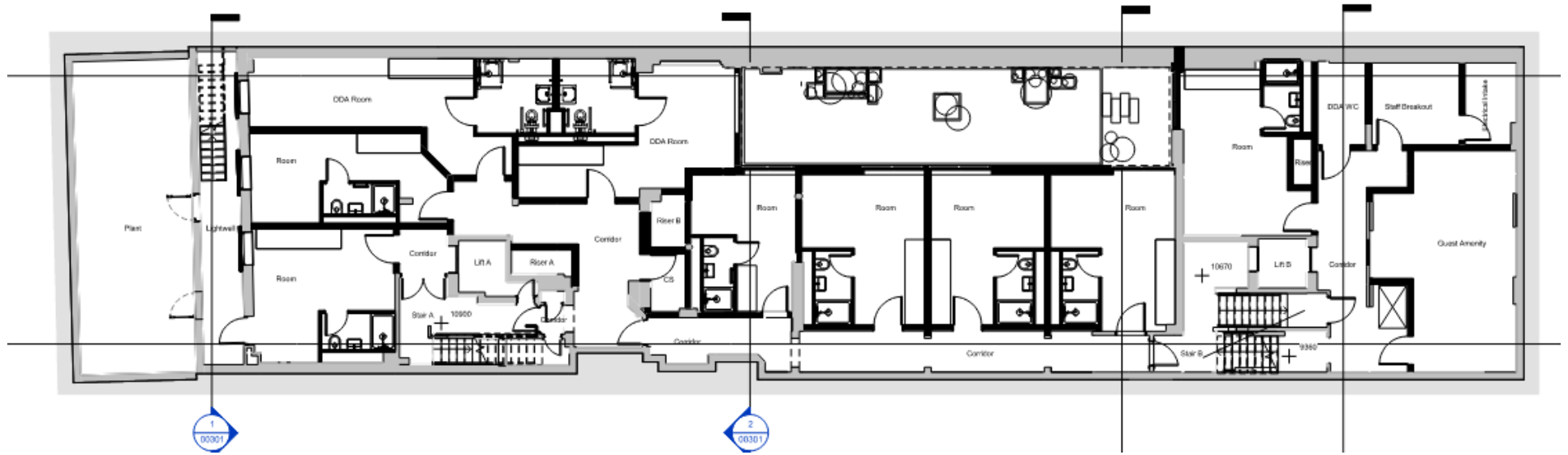
Proposed Roof of 'Link' Structure



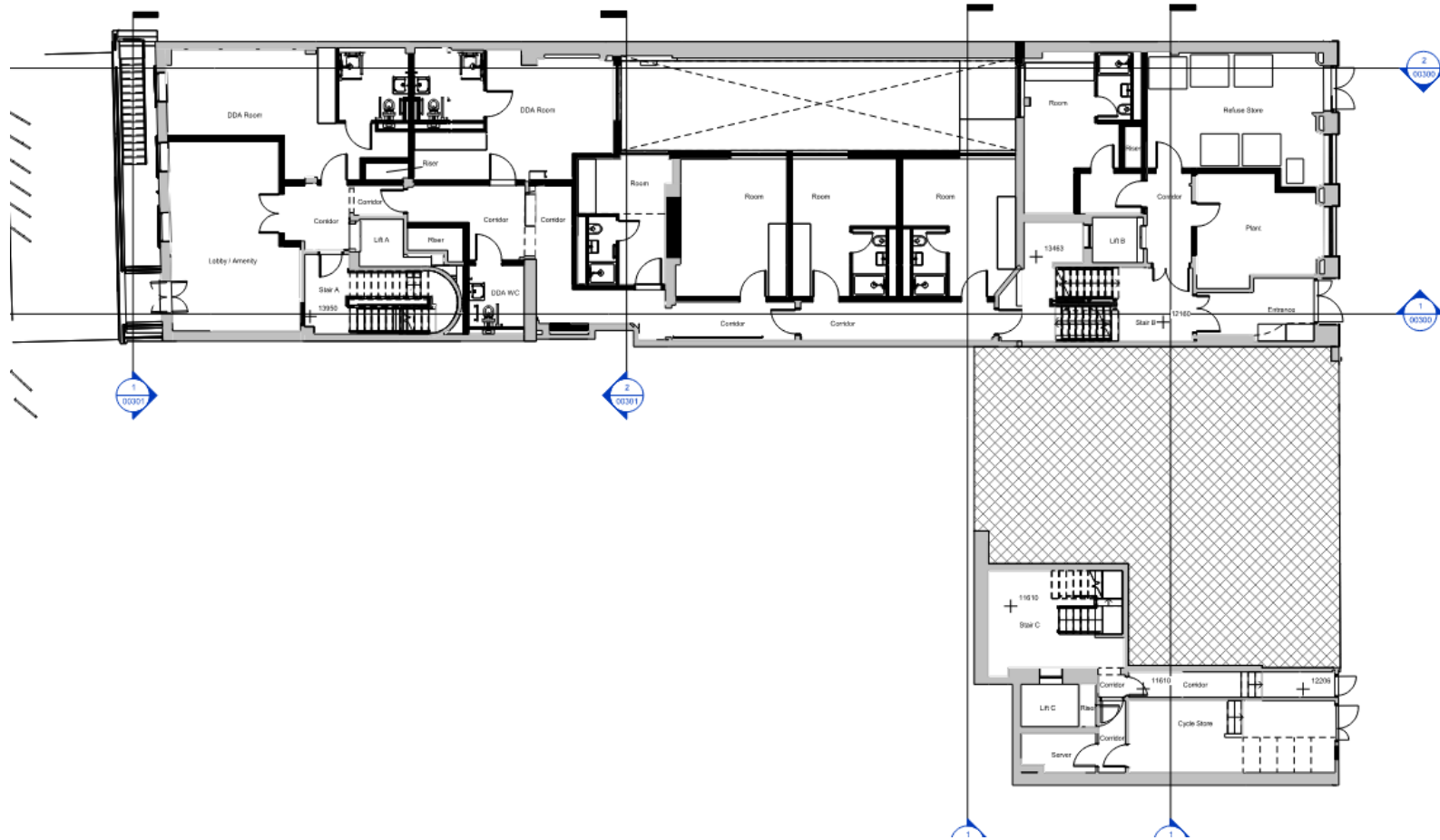
# Proposed courtyard



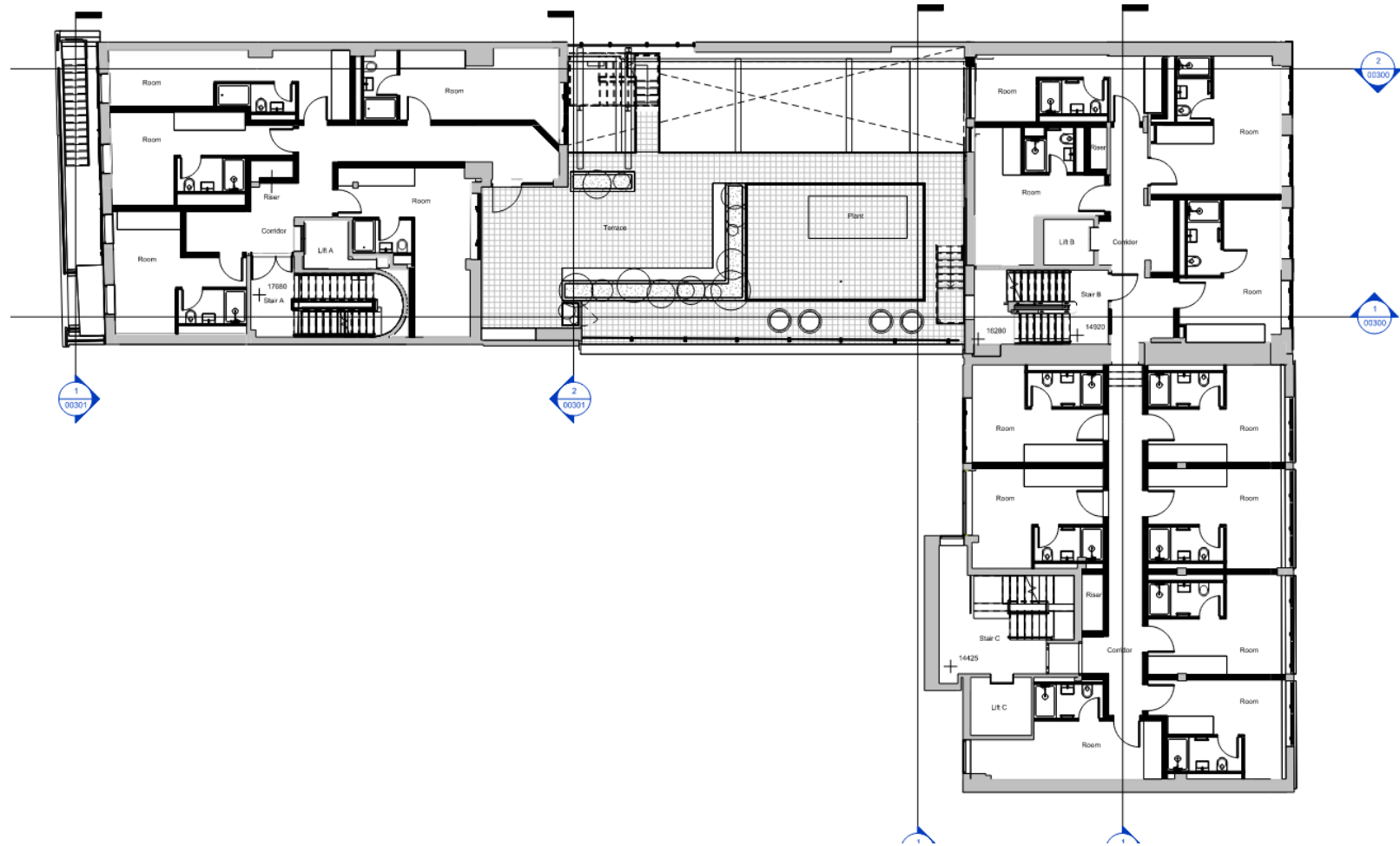
# Proposed basement



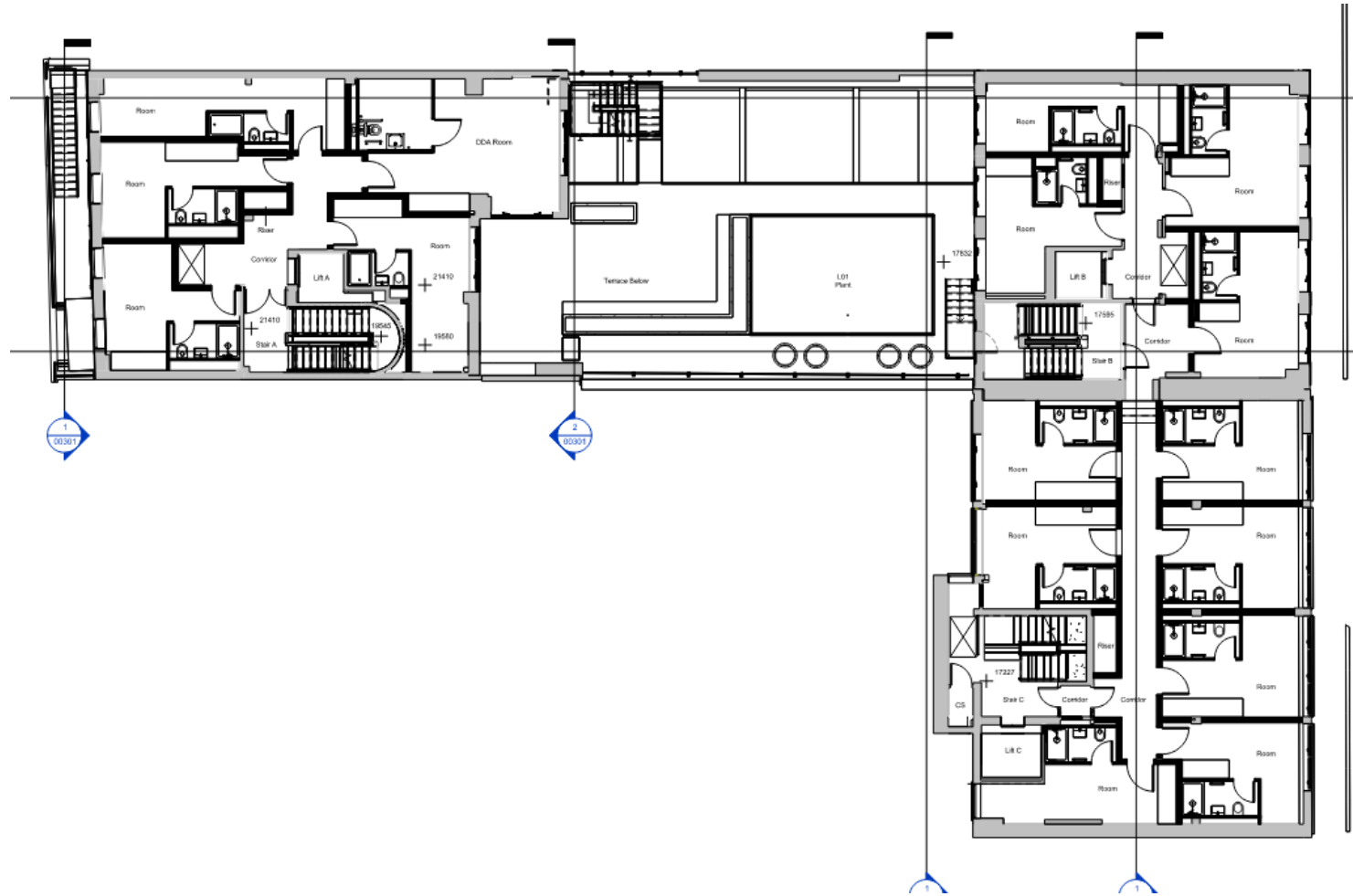
# Proposed ground floor plan



# Proposed first floor

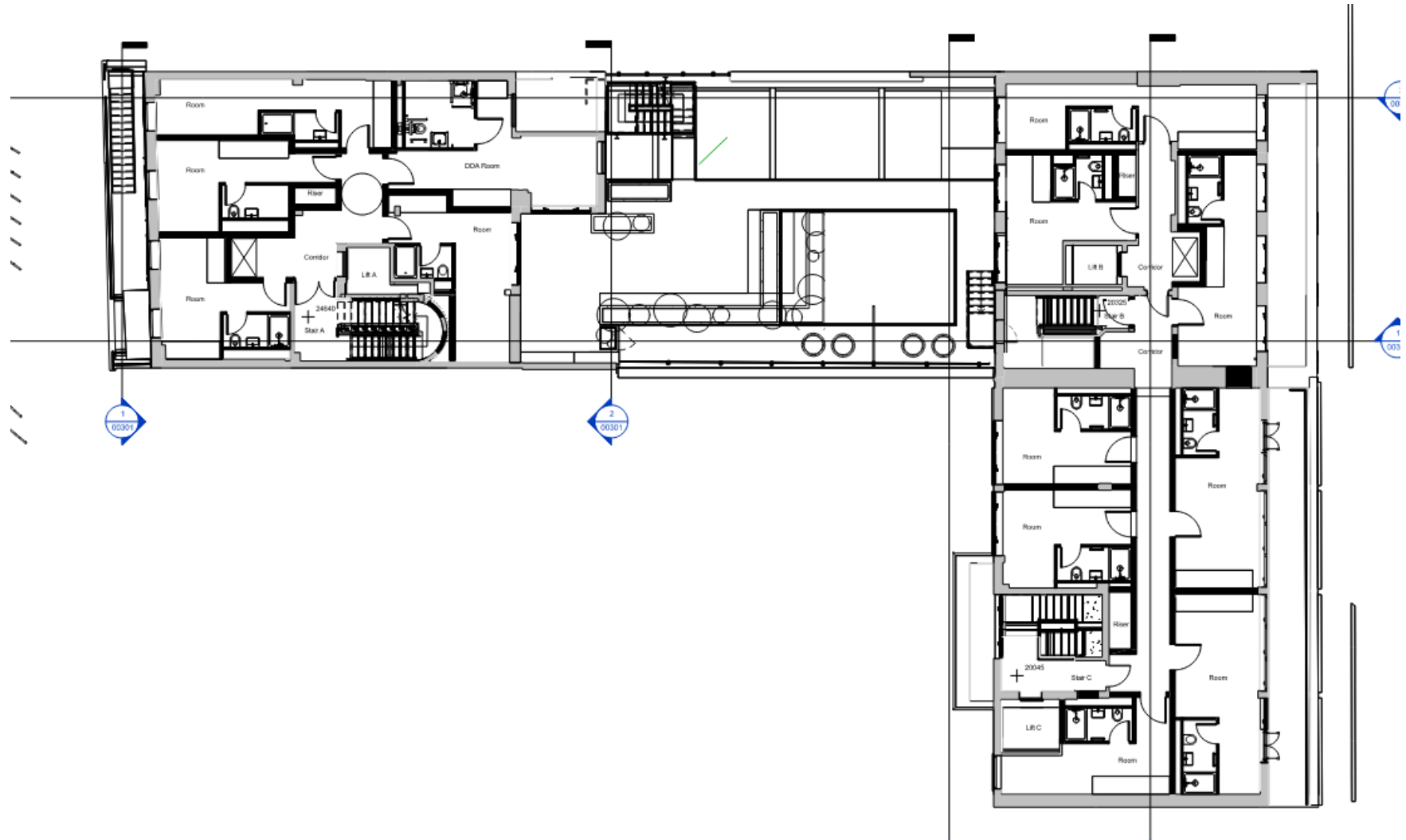


# Proposed second floor

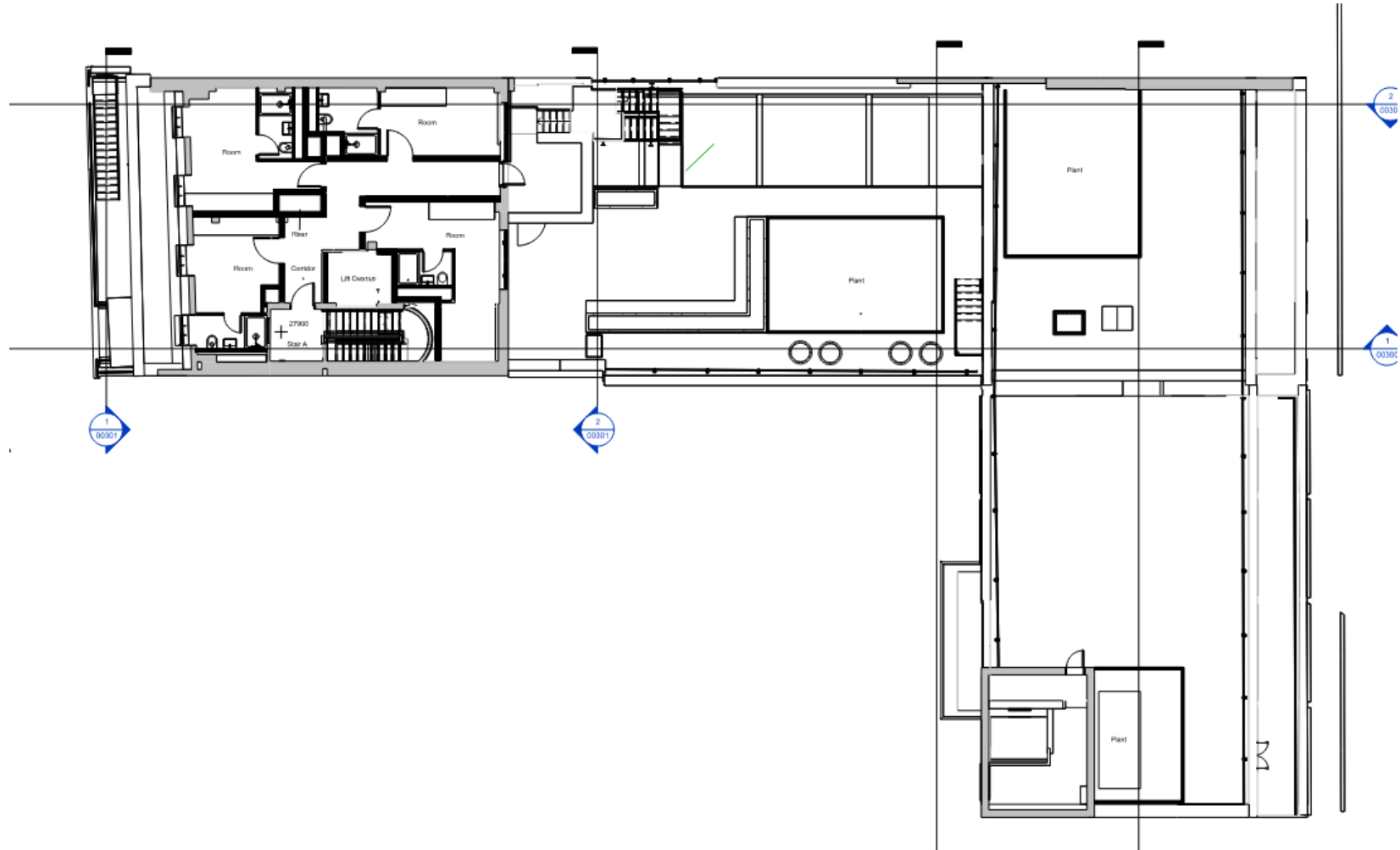




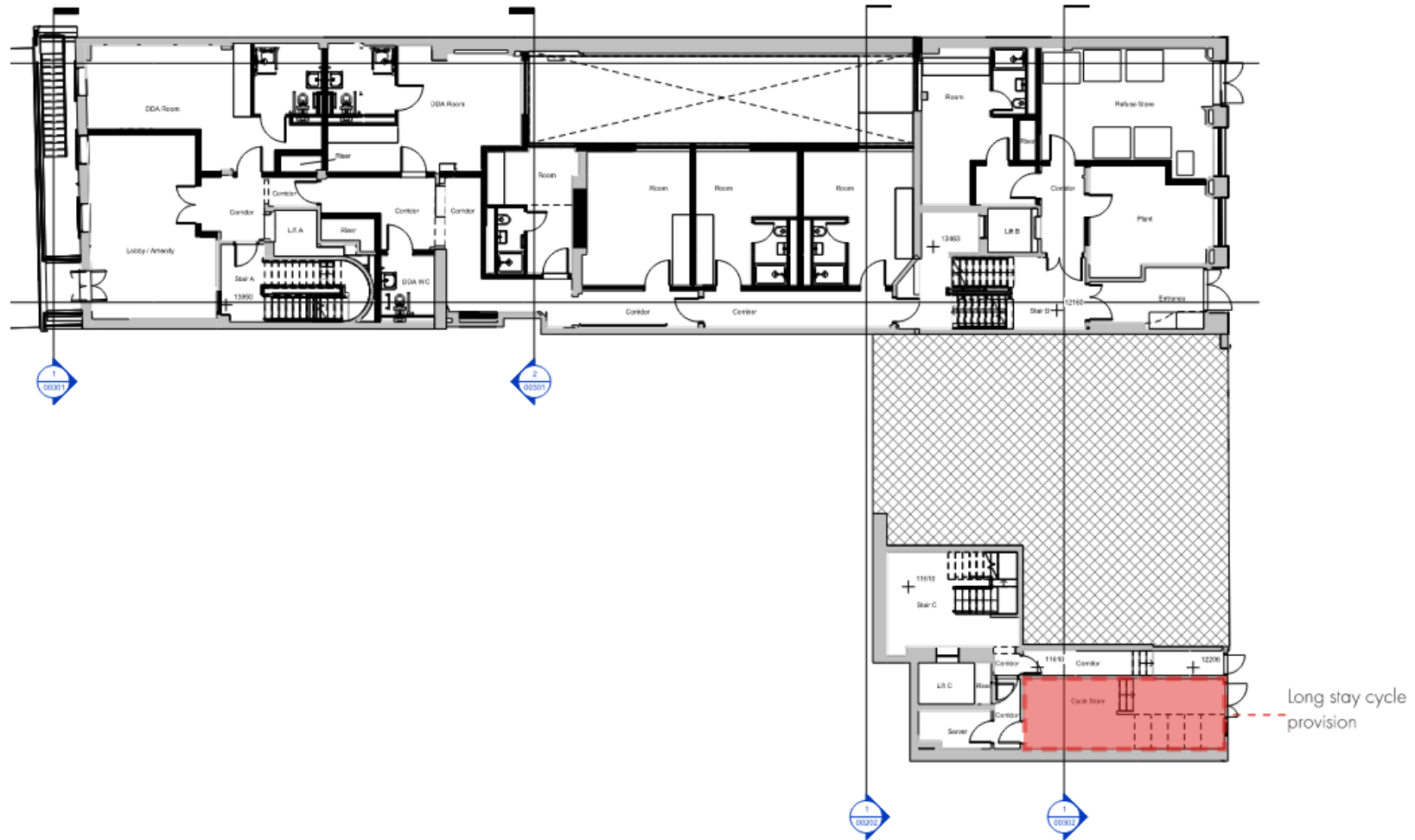
# Third floor plan



# Proposed fourth floor plan



# Location of cycle parking



# Refuse storage location

