

# Planning Statement

8 Guilford Street, London, WC1N 1DA

Prepared on behalf of DCCM Fashion Limited

04 October 2023



Confidential

KF Ref: I:112642

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## 1. Introduction

- 1.1 This Planning Statement has been prepared by Knight Frank LLP (hereinafter 'Knight Frank') on behalf of DCCM Fashion Limited (hereinafter 'the Applicant') in support of their application for Full Planning Permission and Listed Building Consent (hereinafter 'the Application'). The Application has been submitted to the London Borough of Camden (hereinafter 'LB Camden') for the subdivision and part change of use to provide commercial floorspace (Class E) and a self-contained residential dwelling with first floor extension and associated external and internal alterations at 8 Guilford Street, London, WC1N 1DA.
- 1.2 The description of development is as follows:
- "Full Planning Application with Listed Building Consent for subdivision and change of use to provide commercial floorspace (Class E) and a self-contained residential dwelling (Class C3), with first floor extension and associated external and internal alterations."*
- 1.3 The proposals are set out in detail within Section 3 of this Planning Statement, however in summary the proposals comprise:
- The subdivision of 8 Guilford Street to provide a self-contained residential dwelling (Class C3) and commercial floorspace (Class E);
  - Rear extensions at first floor level to provide additional residential floorspace;
  - The introduction of a dedicated entrance for the residential dwelling from Guilford Street;
  - The replacement of existing mansard hatch with a new window; and
  - Other internal and external alterations.
- 1.4 The proposals have been subject to extensive pre-application discussions with Planning and Heritage Officers at the London Borough of Camden. These pre-application discussions are summarised within Section 4 of this Planning Statement, and have informed by the proposed development.

### Application Documents

- 1.5 In accordance with national and local planning application validation requirements, and as agreed with Planning Officers, this application for Full Planning Permission with Listed Building Consent has been submitted with the following supporting documents:
- Cover Letter – prepared by Knight Frank;
  - Application Form and Notices – prepared by Knight Frank;
  - Community Infrastructure Levy Form – prepared by Knight Frank;
  - Site Location Plan – prepared by Rolfe Judd Architects;
  - Existing & Proposed Drawings – prepared by Rolfe Judd Architects
  - Design & Access Statement – prepared by Rolfe Judd Architects;
  - Planning Statement – prepared by Knight Frank;
  - Heritage Impact Assessment – prepared by Jon Lowe Heritage;
  - Daylight and Sunlight Assessment – prepared by EB7; and
  - Sustainability / Energy Conservation Note – prepared by Rolfe Judd Architects.

### Purpose and Structure of this Planning Statement

- 1.6 The purpose of this Planning Statement is to provide justification in 'town planning' terms for the proposed development; to assess the scheme against the Development Plan; and draw on other material considerations to support the case for the proposed development.
- 1.7 This Statement is set out as follows:
- Section 2 provides an overview of the Site;
  - Section 3 outlines the relevant planning history;

- Section 4 provides a summary of pre-application discussions;
- Section 5 explains the proposed development;
- Section 6 sets out the planning policy framework against which the proposed development should be assessed;
- Section 7 assesses the acceptability of the proposed development against the Development Plan and other material considerations; and
- Section 8 concludes the Statement and makes clear the reasons why the proposal should be approved in line with the National Planning Policy Framework, the Development Plan and other material considerations.

## 2. The Site

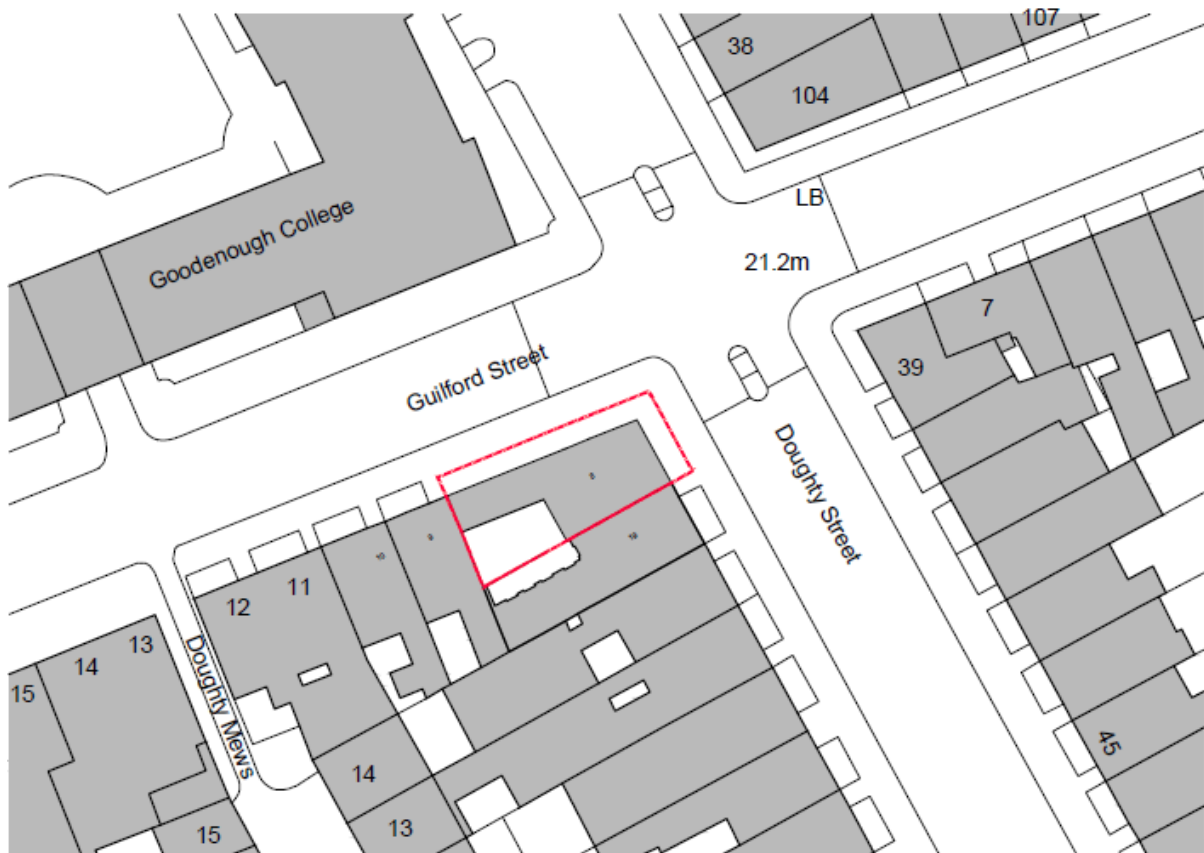
2.1 The following section describes the key characteristics of the Site and surrounding area.

### The Application Site

2.2 The Site comprises the existing property at 8 Guilford Street, London, WC1N 1DA which is located at the junction of Guilford Street and Doughty Street. The Site is located wholly within the administrative boundary of the London Borough of Camden (hereinafter 'LB Camden').

2.3 Located prominently at the junction of Doughty Street and Guilford Street the Site forms part the predominantly residential terraces fronting both Guilford Street and Doughty Street. Consequently the Site is abutted directly to the south by 19 Doughty Street, to the west by 9 Guilford Street and to the north and east by Guilford Street and Doughty Street respectively.

Figure 1: Site Location Plan



Source: Rolfe Judd Architects

- 2.4 The existing property at 8 Guilford Street is Grade II Listed, forming part of a group with 9-10 Guilford Street (which also includes the attached railings at 9 and 10 Guilford Street). The adjoining property at 19 Doughty Street forms part of a separate Grade II Listed group (1-19 Doughty Street). The Site also falls within the Bloomsbury Conservation Area.
- 2.5 Originally constructed as two separate residential dwellings, the Site has been subject to extensive internal and external alterations, reflecting historic changes in use including the most recent use as office accommodation. The property is currently arranged over lower ground, ground, and three upper floors, including existing accommodation provided within a mansard roof. The existing property comprises circa 496.99sq.m of floorspace.
- 2.6 Most recently the property has been used as office accommodation (Class E) by the National Association of Decorative & Fine Arts Societies (hereinafter 'NADFAS'). NADFAS vacated the property at 8 Guilford Street in February 2023 and the property has since been vacant.

- 2.7 The Site benefits from excellent public transport connectivity, with a Public Transport Accessibility Level ('PTAL') of 6a, which is considered 'excellent'. Russell Square Underground Station (Piccadilly Line) is located approximately 500m west of the Site and Chancery Lane Underground Station (Central Line) is located approximately 750m south-east of the Site. In addition to the excellent London Underground connections, the Site is also served by several bus routes that operate throughout the area.
- 2.8 The Site is located within Flood Zone 1 (Low risk). Land and property in this Flood Zone are assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). This indicates the lowest probability of flooding.

### Surrounding Area

- 2.9 The surrounding area forms the Bloomsbury Conservation Area, which is characterised by formal landscaped squares and an interrelated grid of street with consistent building form.
- 2.10 The immediate area within the vicinity of the Site is of a predominantly residential character with a high concentration of both designated, and non-designated heritage assets. The streets are typically set out in long terrace blocks with rear mews. Whilst the area originally primarily provided residential accommodation, many of the buildings have been converted to commercial offices, as well as legal and educational institutions.
- 2.11 The Site is bound to the west by 9 Guilford Street, a Grade II Listed Building comprising self-contained residential accommodation (Class C3), set out across basement, ground, and three upper floors. As is characteristic of the surrounding area, 9 Guilford Street comprises a mansard upper storey. Further to the west lies Doughty Mews, which comprises additional residential properties. To the south, the Site is bound by 19 Doughty Street which is also arranged over basement, ground and three upper levels. 19 Doughty Street is understood to be occupied by Doughty Street Chambers. Corams Field is located further to the south.
- 2.12 Grade II Listed London House (also known as Goodenough College) lies to the north of the Site, and provides postgraduate student accommodation along with an educational trust at Mecklenburgh Square, Bloomsbury.

### 3. Planning History

- 3.1 The following section provides a summary of the planning history relevant to the Site and the proposed development. A comprehensive review of the London Borough of Camden’s online planning register reveals an extensive planning history, with a number of planning permissions and listed building consents.
- 3.2 The following represents a summary of the key planning history associated with the Site, as available on LB Camden’s online planning register:

Table 1: Planning History

| Application Reference | Description of Development  | Decision | Determination Date |
|-----------------------|---|----------|--------------------|
| 75783                 | Erection of an additional storey over the back addition at the premises known as No.8, Guilford Street, St. Pancras, and the rebuilding of a portion of the main front well of the existing premises.           | Approved | 21/06/1939         |
| TP/67973/C/14037      | Extension and elevational alterations to an existing office building at No.8 Guilford Street.   | Approved | 02/07/1970         |
| HB85                  | Listed Building Consent for the erection of a second-floor extension, the roofing of a light well, and various elevational alterations to No. 8 Guilford Street.  | Approved | 02/07/1970         |
| HB209                 | Listed Building Consent for replacement of door surrounds to front door at 8 Guilford Street.   | Approved | 17/12/1970         |
| 8770131               | Listed Building Consent for opening up of blocked-up windows on the Guilford Street frontage.   | Approved | 24/09/1987         |
| 87700773              | Opening up of blocked-up windows on the Guilford Street frontage.   | Approved | 24/09/1987         |
| 8701047               | Erection of an additional floor of offices on the Guilford Street frontage as shown on drawings numbered 1739/87/1 2 3 & 9 revised by letter dated 14th August 1987.  | Approved | 24/09/1987         |
| 2005/2866/L           | Listed Building Consent for internal alterations to offices (Class B1) at ground floor and basement levels, including secondary glazing, demolition of and erection new partitions and facilities for disabled. | Approved | 12/10/2005         |

Source: London Borough of Camden

- 3.3 As set out above, the Site has been subject to multiple applications for extensions and alterations, as well as change of use. Notably, the LB Camden originally granted consent for a single storey upwards extension to the annexe building fronting Guilford Street (Ref. 75783). Subsequently, in 1970, Full Planning Permission and Listed



Building Consent were granted to facilitate a further upward extension to provide additional accommodation at second floor. This approval also comprised covering of the light well at the rear of the basement and ground floors (Ref. HB85).

- 3.4 Full Planning Permission and Listed Building Consent were also granted in 1987 for the erection of additional office floorspace at third floor level fronting Guilford Street (Ref. 8701047). This permission was however not implemented, and subsequently expired.
- 3.5 Most recently Listed Building Consent was granted by LB Camden in 2005 for refurbishment works to the ground and basement levels, including new partitions to form reception and office floorspace, as well as facilitating accessibility for disabled users of the building.
- 3.6 On the basis of the above planning history, the existing lawful use of the Site is understood to be as office accommodation (Class E).

## 4. Pre-Application Discussions

- 4.1 The Applicant has undertaken extensive pre-application engagement with the Planning and Heritage Officers at the London Borough of Camden, with the proposals for 8 Guilford Street initially discussed with Planning and Heritage Officers at a pre-application meeting held on the 12<sup>th</sup> of June 2023 (Ref. 2023/2108/PRE). The proposals subject to the initial pre-application discussions proposed:
- The change of use of the rear portion of the building from office accommodation (Class E) to a self-contained residential dwelling (Class C3), with associated external and internal alterations;
  - The reintroduction of a dedicated residential entrance from Guilford Street;
  - The erection of an additional storey in the form of a dormer to the rear outrigger;
  - Infill extensions at ground, first, and second floors;
  - The refurbishment of the remaining commercial floorspace at the junction of Guilford Street and Doughty Street;
  - The insertion of a new doorway at the lower ground floor (Doughty Street elevation);
  - Insertion of a new fenestration at the ground floor, including a 'shop window', domestic window, and doorway to the Guilford Street elevation;
  - Reinstatement of dividing wall with the addition of double doors between the principal front and rear rooms of the property at ground floor;
  - Replacement of the existing dormers to the roof with new, subservient dormers aligned to those on the primary façade.
- 4.2 An additional follow-up meeting was also held on 3<sup>rd</sup> August 2023, with formal written pre-application advice issued by LB Camden on 1<sup>st</sup> September 2023. The written advice is summarised as follows.

### **Principle of loss of employment floorspace**

- 4.3 The written pre-application advice notes that while the Council typically seek to protect premises that are suitable for continued office use, and therefore typically resist the development of existing office accommodation for other non-office use, LB Camden acknowledge that the existing employment floorspace provided at 8 Guilford Street is compromised. Indeed, it is acknowledged that the current internal layout and arrangements, including split level floors that do not provide accessible floorspace, provides poor quality accommodation that does not meet the needs of prospective future occupiers.
- 4.4 By contrast, LB Camden acknowledges that the proposed consolidation and refurbishment of the existing poor-quality employment floorspace represents an opportunity to provide high-quality office accommodation that responds to occupier needs / expectations, while enhancing the designated heritage asset at 8 Guilford Street.
- 4.5 It is therefore concluded that the proposed modest reduction in employment floorspace (approximately 27% of existing provision), coupled with the refurbishment of the retained employment floorspace would be considered acceptable in principle.

### **Provision of residential accommodation**

- 4.6 The written pre-application advice states that the Site is considered well-suited for the provision of residential accommodation given the predominantly residential character of the surrounding area. Equally, it is acknowledged that the Site's high level of public transport accessibility supports the provision of residential accommodation. Furthermore, the written pre-application advice concludes that the proposed provision of a three-bedroom family dwelling is supported in principle given the high priority need for family housing within the borough.
- 4.7 In respect of affordable housing provision, Planning Officers accept that a payment in lieu of affordable housing will be made by the Applicant. This affordable housing contribution would be secured via a S106 Agreement.
- 4.8 Overall the written pre-application advice confirms that the principle of the introduction of residential accommodation at 8 Guilford Street is supported.

### **Heritage and Design**

- 4.9 The LB Camden considers the proposed partial change of use from office (Class E) to residential accommodation (Class C3) to be acceptable in terms of the impact on the Listed Building and wider Conservation Area. The

written pre-application advice notes that the part of the property which is to be converted to residential use has been substantially modified over time and retains few original features. On this basis, the proposed subdivision of the property, and partial conversion to residential use is considered to not to represent any harm to the significance of the designated heritage asset.

- 4.10 While the proposed introduction of a dedicated residential entrance on Guilford Street would result in the removal of historic fabric, the written pre-application advice concludes that this is acceptable and is consistent with similar proposals at 62 Roger Street.
- 4.11 Through the extensive pre-application discussions, the form, scale, and materiality of the proposed rear extension has been rationalised, with a single-storey height brick structure with more traditional fenestration now proposed. Planning and Heritage Officers at LB Camden consider the revised approach to be subservient to the existing building and more sensitive in comparison to that proposed in the initial pre-application submission. Coupled with the removal of the previously proposed mansard roof extension, Planning and Heritage Officers support the revised proposals for the modest first floor extension.

### **Conclusion**

- 4.12 The proposed development as described at Section 5 of this Statement, has been fully informed by the extensive pre-application discussions with Planning and Heritage Officers at the London Borough of Camden. With the proposals subject to this application reflecting those comments raised by Planning and Heritage Officers during pre-application discussions.

## 5. The Proposed Development

### Introduction

- 5.1 This application seeks Full Planning Permission with Listed Building Consent for the subdivision of 8 Guilford Street to provide commercial floorspace (Class E) and a self-contained dwellinghouse (Class C3) together with extensions at first floor level and associated external and internal alterations.
- 5.2 The description of development is as follows:

*“Full Planning Application with Listed Building Consent for subdivision and change of use to provide commercial floorspace (Class E) and a self-contained residential dwelling (Class C3), with first floor extension and associated external and internal alterations.”*

- 5.3 The following section sets out those proposed internal and external works at 8 Guilford Street.

### Internal Alterations

- 5.4 The property at 8 Guilford Street was originally constructed as two separate dwellings, which were later cojoined to create a single property. The proposed subdivision will seek to reinstate the property as two separate properties through the reintroduction of an internal party wall at basement, ground, first and second floors. The proposed party wall broadly reflects the location of the original party wall.
- 5.5 In addition to the reintroduction of a party wall, the proposed internal alterations include the introduction of a second stair to service the proposed residential dwelling.
- 5.6 Further to the main structural changes required to facilitate the subdivision of the property, the proposals also incorporate alterations to the internal layout of the proposed commercial floorspace and residential dwelling. These alterations reflect the proposed use of the properties for commercial floorspace and a residential dwelling, and are set out in detail within the accompanying planning drawings, Design & Access Statement and Heritage Impact Assessment.

### Change of Use

- 5.7 The proposed development includes the change of use of part of the property from office accommodation (Class E) to form a self-contained residential development (Class C3). The self-contained residential dwelling is to be located within the western part of the property, and is to be accessed via a dedicated entrance from Guilford Street.
- 5.8 The proposed residential dwelling is to comprise a three-bedroom property arranged over basement, ground, first and second floors, with private external amenity space provided at basement and first floor levels. The proposed dwelling will be 183sq.m (GIA).

### Rear First Floor Extension

- 5.9 The proposed development includes a modest rear extension at first floor level, providing additional residential accommodation. The proposed rear extension is designed to reflect the historic character of the property.

### Fenestration

- 5.10 The proposed development includes minor alterations to the existing fenestration at 8 Guilford Street, including the replacement of the existing hatch within the mansard roof with a window, and the introduction of a new door to the Guilford Street elevation.
- 5.11 The proposed additional door will provide a dedicated entrance to the proposed residential dwelling from Guilford Street.
- 5.12 Full details of the proposed internal and external alterations at 8 Guilford Street are set out within the accompanying drawings, Design & Access Statement and Heritage Impact Assessment that support this application.

## 6. Planning Policy Framework

### Introduction

- 6.1 The following section provides a summary of the planning policy context relevant to the consideration of this application.
- 6.2 A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision-making process. In accordance with Section 38(6) of the Planning and Compulsory Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.3 For the purpose of this application, the Development Plan comprises:
- London Plan (2021);
  - Camden Local Plan (July 2017);
  - Camden Site Allocations Local Plan (September 2013); and
  - Camden Local Plan: Policies Map (June 2017).
- 6.4 The London Borough of Camden is in the process of reviewing their Local Plan ('Local Plan Review'). In November 2022, the Council launched the initial consultation on its review of its Local Plan, alongside a Call for Sites (including housing, employment and gypsy and traveller sites) exercise. It is anticipated that the Local Plan Review will be adopted in Summer 2025.
- 6.5 We note that the Site is not designated within a Neighbourhood Planning Area.
- 6.6 Other material considerations include:
- The National Planning Policy Framework ('NPPF');
  - Bloomsbury Conservation Area Appraisal and Management Strategy

## 7. Planning Assessment

### Introduction

7.1 This section assesses the proposed scheme against the development plan and identifies other material considerations of weight where appropriate. Through pre-application discussions, and as made clear by planning policy and guidance, the key matters to consider are as follows:

- Principle of Sustainable Development;
- Principle of Consolidation of Existing Use;
- Principle of Residential Development;
- Affordable Housing;
- Heritage Impact; and
- Residential Amenity;

7.2 Each of these matters is considered in detail below.

### Principle of Sustainable Development

7.3 National, regional, and local planning policies and guidance seek to meet development needs through the effective and efficient use of highly sustainable previously developed sites.

7.4 Paragraph 119 of the NPPF outlines that *'planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land'*.

7.5 Paragraph 120 of the NPPF states that *'planning policies and decisions should... give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs'*.

7.6 London Plan Policy GG2 (Making the Best Use of Land) highlights that to make the best use of land, proposals that enable the development of previously developed land will be supported, particularly where sites are well connected to public transport and in close proximity to town and local centres.

7.7 The policy further explains that those involved in planning and development must proactively explore the potential to intensify the use of land in the most sustainable locations. The proposals reflect these principles, with the Site representing highly sustainable and previously developed land which benefits from close proximity to key local services / facilities and public transport.

7.8 More specifically, Camden Local Plan Policy G1 (Delivery and location of growth) states the Council will deliver growth by securing high-quality development and promotion the most efficient use of buildings in Camden by expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible.

7.9 Given the special architectural and historic interests of the heritage asset, the proposal comprises the sensitive refurbishment of the existing building, coupled with sensitive extensions that reflect the historic development of the Site.

7.10 Overall, we contend the proposals, which will make the efficient and effective use of a sustainable and previously developed site, represent sustainable development and should therefore be supported under the provisions of the NPPF, London Plan and Local Plan.

### Principle of Consolidation of Existing Use

7.11 The property at 8 Guilford Street is currently arranged over lower ground, ground and three upper floors, which include the existing mansard roof, providing circa 496.99sq.m of floorspace. Prior to the Applicant's acquisition the property was occupied by 'NADFAS' and utilised as low-grade office accommodation (Use Class E).

7.12 Policy E2 of the Camden Local Plan states that the Council will seek to protect existing employment premises, or sites that are suitable for continued business use, in particular those premises that are suitable for small businesses, those businesses and services that provide employment for residents of the London Borough of Camden and those uses that support the functioning of the Central Activities Zone ('CAZ') or the local economy.

7.13 Whilst the Council would typically resist the redevelopment of business premises and sites for non-business use, it is noted that the Council will support proposals for the consolidation of existing employment floorspace where: (a)

the site or building is no longer suitable for its existing business use; and (b) that the possibility of retaining, reusing or redeveloping the site or building(s) for similar or alternative business use has been fully explored over an appropriate period of time.

- 7.14 In relation to the above, the Camden Local Plan explains that when considering whether there is potential for continued business use, the following points will be considered: the suitability of the location for any business use; whether the premises are in a reasonable condition to allow the use to continue; the range of unit sizes it provides, particularly suitability for small businesses; and whether the business use is well related to nearby land uses.
- 7.15 It is contended that the existing employment floorspace is compromised because of the current internal layout and arrangements, including split level floors that do not provide accessible floorspace, and therefore represents poor quality accommodation that does not meet the needs of future users. As a result, the existing vacant floorspace is not commercially attractive and cannot meet the needs or expectations of the current occupier market, which is impacting the long-term sustainability and use of the property.
- 7.16 It is also contended that the proposals represent a minor reduction (circa 170sq.m) of the existing employment floorspace, which is situated within the rear part of the building, and equates to less than 27% of the existing employment floorspace.
- 7.17 Therefore, although Policy E2 of the Camden Local Plan typically seeks to protect existing viable office floorspace, it is contended that the proposals at 8 Guilford Street represent the consolidation of the existing commercial floorspace, with the commercial floorspace that is to be retained is to be subject to extensive refurbishment. Through the consolidation of the existing floorspace, and extensive refurbishment of the retained commercial floorspace, the proposed commercial floorspace will meet the requirements of future occupiers and the long-term and optimal use of the commercial floorspace is secured. Indeed, it is strongly contended that the proposed consolidation and refurbishment of the existing poor quality low-grade employment floorspace will respond to modern needs and ultimately safeguard and enhance the existing Grade II Listed Building.
- 7.18 The Applicant is committed to providing enhanced commercial floorspace through the consolidation, and refurbishment of, the existing employment floorspace; and intends to occupy the proposed commercial floorspace for use as DCCM Fashion London's headquarters, demonstrating their a long-term commitment to the preservation of the property. As such, the proposals will unlock the Site as a whole for its optimum viable use and secure the long-term conservation of the Grade II Listed Building through considerable expenditure and investment.
- 7.19 Camden's Employment Sites and Business Premises CPG (2018) adds that where the Council support the loss of office use, the Council will seek a contribution from developers towards measures which create or promote opportunities for employment or training of local people. Such a contribution is only sought in where the net loss of employment space is 500sq m (GIA) or more.
- 7.20 Overall, it is concluded that the proposals will result in a modest reduction to the existing low-grade employment floorspace, while the significant refurbishment of the retained commercial floorspace will ensure that it meets modern requirements.

### Principle of Residential Development

- 7.21 National policy, London Plan and LBC policies all identify a need for new residential supply and generally support new residential development.
- 7.22 At a strategic level, London Plan Policy H1 (Increasing housing supply) housing target is to provide 10,380 new homes within the London Borough of Camden over a 10-year period of 2028/29, at an average of 103 homes per year.
- 7.23 Furthermore, the London Plan also states that increasing the rate of housing delivery from small sites is a strategic priority, adding that boroughs should pro-actively supported well-designed new homes on small sites through planning decisions (Policy H2 Small Sites).
- 7.24 Camden Local Plan Policy H1 (Maximising housing supply) explains that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. The London Borough of Camden will achieve this by regarding self-contained housing as the priority land-use of the Local Plan.
- 7.25 LBC have not published their latest housing supply figures but the latest Housing Delivery Test 2021 measurement for Camden is 76%, therefore, as the delivery has fallen below 85% LBC will need to add a 20% buffer to their housing target to address the reasons for the housing shortfall.

- 7.26 Therefore, there is a pressing need for additional housing within the London Borough of Camden, and given the reasons set out above it is considered that the modest reduction of office floorspace at 8 Guilford Street to provide a family dwelling should be considered to be appropriate.
- 7.27 Furthermore the proposed change of use would reinstate an original residential use at the Site, as the property was purpose-built as two separate properties, which is an important planning material consideration in favour of the change of use.
- 7.28 Camden Local Plan Policy H7 (Large and small homes) states that residential development should contribute towards Camden's Dwelling Size Priorities Table, which is based upon the outputs of the Camden Strategic Housing Market Assessment. The proposals at 8 Guilford Street seek to provide a three-bedroom dwelling, which is identified within the Camden Local Plan as a higher priority.
- 7.29 Overall, the proposals accord with local and regional policy as it will contribute to meeting prioritised and local housing needs on a small site, through the delivery of a well-designed dwelling, in a highly sustainable location where new housing in Camden is being focused.

### Affordable Housing

- 7.30 The Council aims to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17-2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 7.31 The London Borough of Camden expect a contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 7.32 The proposals at 8 Guildford Street are to provide a dwellinghouse with a floorspace of 183sq.m. Consequently, in accordance with Policy H4 of the Camden Local Plan the Applicant will make a payment-in-lieu of affordable housing. The affordable housing contribution would be secured via the s106 legal agreement.

### Heritage Impact

- 7.33 The Site at 8 Guilford Street is a Grade II Listed Building and also falls within the Bloomsbury Conservation Area. The Site is also in close proximity to a number of other listed buildings, and given the Site's prominent location and position as part of a larger terrace, performs an important role in the setting of these nearby listed buildings.
- 7.34 Given the sensitive heritage context, a Heritage Impact Assessment has been prepared by Jon Lowe Heritage Ltd in support of this planning application. The Heritage Impact Assessment assesses the significance, character and appearance of the existing building as well as its contribution to the Bloomsbury Conservation Area and nearby listed buildings. The Heritage Impact Assessment also assesses the impacts and effects of the proposed works upon the significance of those designated and non-designated heritage assets. In doing so it supports the statutory obligation on decisionmakers to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas and to have special regard to the desirability of preserving listed buildings and their settings.
- 7.35 The Site is considered to have architectural and historic interest and significance. Its interest and significance are not however archaeological or artistic. The street-facing elevations (to Guilford Street and Doughty Street) are the property's principal features of architectural interest, with their proportions, hierarchy, materiality, and detailing, along with their role in the wider planned townscape, all contributing to the building's architectural interest and significance.
- 7.36 The interior interest of the building has somewhat been lessened due to the changes to the building's plan form and proportions, which are as a result of an infill extension at basement level and the addition of the second-floor rear wing extension. In addition, very few elements of original and historic decorative fabrics have survived because of the property's history of commercial use, which has again reduced the property's sensitivity to change.
- 7.37 In terms of historic interest, the property derives this significance through its inclusion within the development of the Foundling Hospital and Doughty Estates in the late 18th century.
- 7.38 The Bloomsbury Conservation Area is also of architectural and historic interest. It covers a significant area of planned urban landscape with a street layout, urban form, and architectural character, with much of its building stock is residential in form and character.
- 7.39 In townscape and urban design terms, the Site plays an important role as the bookend to a larger terrace along Doughty Street and contributes positively to the character and appearance of the Bloomsbury Conservation Area. It is however identified that the following later changes to the property have diminished its the contribution:
- Rendered ground floor elevation;



- Low quality brick to rear wing extension;
  - Replacement windows;
  - Partial infilling of the front lightwell/area;
  - Loss of original railings; and
  - Change to entrance tiling.
- 7.40 The proposals seek to deliver a high-quality refurbishment of the existing property to provide enhanced and improved facilities that improve the overall character and condition of the Grade II Listed Building. The following section considers how the proposed development would be sympathetic to local heritage, character and significance.
- 7.41 The NPPF sets out the policy basis for assessing development affecting heritage assets, in line with statute and case law on listed buildings and conservation areas. It states that in determining applications that result in any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 7.42 On the basis of the above, the proposed development has evolved to ensure that opportunities for enhancement are maximised, and that any heritage impacts are reduced. The proposals therefore reflect the extensive pre-application discussions held with Planning and Heritage Officers at the London Borough of Camden.
- 7.43 The Heritage Impact Assessment has identified isolated elements of the proposals that could have a slight adverse effect on the asset's significance, but on the whole these impacts and their effects are concluded to be minor and neutralised by several benefits. It is considered that any perceived harm to the asset's significance should be considered at the very lowest limit of 'less than substantial' in NPPF terms.
- 7.44 It is an important consideration that the property has been subjected to many phases of invasive and often unsympathetic changes, which have removed the vast majority of its historic decorative features and made large changes to its historic plan form. Many of its spaces can therefore comfortably accommodate sensitive change without adversely impacting the building's overall special interests.
- 7.45 Where slight adverse impacts have been identified they are largely in areas of lesser sensitivity and are relatively minor in nature, often reversible. They are also mitigated by beneficial impacts being proposed elsewhere, such as through the reinstatement of a dividing wall between principal rooms at ground floor level. Potential adverse impacts on the Bloomsbury Conservation Area are extremely minor in nature, and the significance of nearby listed buildings would be preserved by the proposals.
- 7.46 Paragraph 202 of the NPPF requires that a less than substantial harm be weighed against the public benefits of a proposal. The following heritage-related public benefits arise from the development, taken as a whole:
- The securing of the long-term conservation of the listed building through considerable expenditure and investment;
  - Bringing the vacant property back into a viable use;
  - Improvements to condition, decorative fabric and quality throughout the building; and
  - The returning of part of the building to residential use: a key characteristic of the area.
- 7.47 The proposals will unlock the Site fully and significantly increase the potential long-term use and viability. Further benefits include enhancing the existing townscape through revitalisation the fenestration, delivering high sustainability and environmental standards and improving the usability of the rear part of the building.
- 7.48 It is strongly contended that the proposed development should be supported on the basis of the wider public benefits. Given the location of the Site within the Bloomsbury Conservation Area, the development will be of the highest quality, preserve and enhance the character and appearance of the Grade II Listed Building, and protect the setting of the Bloomsbury Conservation Area.
- 7.49 The proposals have been assessed against the policy and guidance set out within the NPPF and Camden Council's Local Plan. This assessment concludes that the proposed development accords with the policy and guidance and offer sympathetic and informed changes that will maintain and improve the overall interests of the listed building and street scene without detracting from their special interests.

### Residential Amenity

- 7.50 The proposals include the change of use of part of the existing property to provide a self-contained dwelling. The architectural approach that has been adopted within the proposals ensures that the proposed residential dwelling

will benefit from excellent residential amenity, including the provision of private external amenity space as well as ensuring the property benefit from adequate daylight / sunlight.

- 7.51 The proposed residential dwellings will provide a high-quality family home, comprising three bedrooms across basement, ground, first and second floors. The proposed dwellings will comprise 183sq.m therefore exceeding the nationally described space standards.
- 7.52 The proposals incorporate the provision of private external amenity space at basement and first floor levels, with a 'courtyard' provided within the existing lightwell at basement level and a terrace at first floor level. The proposed external amenity space is considered to reflect the character of the dwelling and the wider area.
- 7.53 The application is accompanied by a Daylight & Sunlight Assessment prepared by EB7, which concludes that 75% of the habitable rooms will meet or exceed the recommended targets for daylight. The only habitable room that does not meet or exceed the relevant targets being the proposed bedroom located at basement level. Whilst this bedroom represents a deviation from the BRE guidance the bedroom will still receive 52 Lux which is considered to be a reasonable level of the median BRE illuminance lux targets. The Daylight & Sunlight Assessment concludes that those three habitable rooms that will meet or exceed the BRE Guidance for Sunlight will benefit from excellent levels of daylight and sunlight, with the main living space significantly exceeding the BRE Guidance.
- 7.54 Overall, it is contended that the proposed residential dwelling will benefit from excellent residential amenity.

## 8. Conclusion

- 8.1 This Planning Statement has been prepared by Knight Frank on behalf of DCCM Fashion Limited in support of their application for Full Planning Permission and Listed Building Consent at 8 Guilford Street, London, WC1N 1DA.
- 8.2 The proposals seek the subdivision and change of use of 8 Guilford Street to provide high-quality commercial floorspace for use by DCCM Fashion Limited together with a self-contained residential dwelling, with a modest extension at first floor level and associated internal and external alterations.
- 8.3 The development proposals have been fully informed by extensive and constructive pre-application discussions with Planning and Heritage Officers at the London Borough of Camden, with the proposals reflecting the pre-application advice received. The pre-application process concluded with broad support for the proposals.
- 8.4 The proposals at 8 Guilford Street which will consolidate and enhance the existing poor quality, vacant office accommodation, creating high quality commercial floorspace that meets modern requirements alongside the provision of a high-quality family dwelling. The proposals therefore make the efficient and effective use of a highly sustainable site.
- 8.5 Those proposed alterations to the Grade II Listed Building will result in the refurbishment, alteration and reinstatement of features throughout 8 Guilford Street which would greatly improve the overall condition and quality of the building and enhance its significance.
- 8.6 Overall it is contended that the proposals at 8 Guilford Street are consistent with those objectives of the NPPF and Camden Local Plan and should therefore be approved.

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