

ROLFE JUDD
/ PLANNING

/ 52 Doughty Street

PLANNING STATEMENT

21 December 2023

/ 52 Doughty Street

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01. INTRODUCTION

01.1 SUMMARY

01.1.1 This Planning Statement has been prepared by Rolfe Judd Planning on behalf of the applicant, Socrates Miltiadou, ('The Applicant'). The purpose of this statement is to explain the proposed development and examine the planning and listed building matters relating to the Applicants' proposals at 52 Doughty Street, WC1N 2LS.

01.1.2 The application comprises planning and listed building applications made under the Town and Country Planning Act 1990 (as amended) and; the Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended). The applications have been submitted to the Local Planning Authority, London Borough of Camden, via the Planning Portal.

01.1.3 The description of development for the application is shown below:

*'Change of use of the building from office to residential, in the form of a single family dwelling.
Associated internal and external alterations including partial demolition of ground floor slab to create a rear lightwell at lower ground floor level; replacement of windows and door at rear third floor level and;
the installation of plant equipment and PV panels at roof level.'*

01.2 PLANNING STATEMENT

The purpose of this statement is to examine the planning and heritage issues raised by the current development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the proposed internal and external alterations, including the installation of plant.

01.2.1 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, our planning statement is structured as follows:

- Section 1: Introduction
- Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site and its previous uses.
- Section 3: Planning History – summarises relevant planning policy at the Application Site
- Section 4: Pre-Application Advice – summarises engagement and formal pre-application advice received from London Borough of Camden.
- Section 5: The Proposal – describes the proposed development.
- Section 6: Planning Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels.
- Section 7: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and
- Section 8: Conclusion

01.3 SUPPORTING APPLICATION DOCUMENTS

01.3.1 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- / Plant Noise Assessment – prepared by Zona Acoustics.
- / CIL Form 1: CIL Additional Information – prepared by Rolfe Judd Planning.
- / Design & Access Statement – prepared by Miltiadou Cook Mitzman Architects.
- / Existing Drawings - prepared by Miltiadou Cook Mitzman Architects.
- / Heritage Statement – prepared by Handforth Heritage.
- / Marking Evidence Report – prepared by Ashurst Real Estate.
- / Proposed Drawings - prepared by Miltiadou Cook Mitzman Architects.
- / Site Location Plan – prepared by Miltiadou Cook Mitzman Architects.

02. THE APPLICATION SITE AND SURROUNDING AREA

02.1 SITE DESCRIPTION & LOCATION

02.1.1 52 Doughty Street is located on the eastern side of Doughty Street. The building is located at the centre of Doughty Street bound by the B502 to the north and Roger Street to the South. No.52 is set within a terrace of houses, the building itself is formed of five floors comprising basement, ground, first, second and third. The building is currently in office use (Class E).

02.1.2 The Application Site is located within the following planning policy designations:

- / Bloomsbury Conservation Area
- / Central London Area
- / Protected Vistas LVMF 2010 - Blackheath Point to St Paul's Cathedral
- / Archaeological Priority Area – London Suburbs
- / PTAL rating of 6a

02.2 LISTED BUILDING STATUS AND HERITAGE ASSESSMENT

02.2.1 This pre-application request is accompanied by a Heritage Assessment which has been prepared by Handforth Heritage and provides a comprehensive overview of the history and listed building status of the building. The Heritage Assessment confirms that no.52 was built somewhere between 1800 – 1828, with early cartographic evidence of completion of the building in 1828.

02.2.2 No.52 forms part of a wider terrace of listed buildings that were first designated in 1974, with the list entry updated in 1999. Historic England' list description is as follows:

Terrace of 23 houses, excluding No.48 which is listed separately (qv). Nos 39-46 c1792; Nos 47-62 c1807-9; terrace completed by 1820. No.62 rebuilt in facsimile since 1974. Built by J Wigg, G Slaton and J Wilson. Multi-coloured stock brick most with evidence of tuck pointing; No.45 painted. Plain stucco first-floor sill band. Slate mansard roofs with dormers except Nos 53-55 and 62. Nos 39-47, 49- 52 and 56-61: three storeys, attics and dormers. Three windows each; No.39 with four windows (one blind) and three-window return to Guilford Street. Round-arched doorways with panelled or recessed pilaster-jambs, cornice-heads, most with patterned fanlights and panelled doors. Nos 44-47, 49, 51 and 52 have doorways with stuccoed surrounds; Nos 57-61, doorways with Greek Doric engaged columns carrying cornice heads with guttae. Gauged brick flat arches to recessed, mostly 2-pane sashes. Nos 49, 52, 56, 57 and 60 with cast-iron balconies to first-floor windows. Stucco cornices and blocking courses, except No.39. Most houses with original lead rainwater heads and pipes.

INTERIORS: not inspected. Nos 53-55 and 62: four storeys and basements. Three windows each, No.62 with 3-window return to Roger Street, plus three-storey three-window extension. Nos 53-54, round-arched doorways with moulded jambs and lion-head stops, cornice-heads and patterned radial fanlights. No.55 has projecting round-arched, rusticated stucco portico with cornice and later C19 doorway. Patterned, half-glazed door and overlight. No.62 has return with projecting Doric porch, partglazed doors and patterned fanlight. Gauged brick flat arches to recessed sash windows; first-floor with cast-iron balconies. Cornice, continuing from other houses in terrace, at third-floor level.

INTERIORS: not inspected but Nos 53-55 noted to have stick baluster stairs. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras, IV: London: -1952: 50-54).

02.2.3 In assessment of the existing heritage asset, the Heritage Assessment confirms that the front façade of the building has lost all of its original windows and comprises a modern front door, concrete paving entrance ramp and 20th century awning. The Assessment confirms the rear of the building comprises no architectural or historic interest having been extended and rebuilt in the 1970s, as demonstrated in the Planning History Section below.

02.2.4 The submitted Heritage Assessment provides a full assessment of the building's heritage. A summary of this is provided below.

Lower Ground Floor

02.2.5 The original plan form of the lower ground floor has been eroded – through the removal of the former wine cellar, originally enclosed by two spine walls, the enclosure of the whole rear elevation for a substantially deep extension, and the insertion of a lift and service cupboard that have significantly changed the rear room's original open profile. The only historic features at this level is a Georgian newel post and stick balusters.

02.2.6 Ground Floor

02.2.7 The plan form of the ground floor has been heavily eroded over time; again through the insertion of the lift and service risers.

02.2.8 In terms of historic interest and features – the ground floor retains a geometric staircase; patterned fanlight above the front door and historic shutters and soffits. As cited in the Heritage Assessment the original rear wall, which connects the former rear room to the 1970s extension, is still appreciable. There is also a shallow chimney breast at the centre of the building.

First Floor

02.2.9 The historic plan form of the piano nobile has been eroded through the addition of the 1970's extension, services and lift. These insertions have also altered the proportions of the landing pattern, with access from the staircase to the first floor currently only via a single entrance door leading into the front room. A modern glazed partition has been added to create a meeting room at the front of the building.

- 02.2.10** In terms of historic interest and features – the front room has its original shutters which have been painted shut, the front and rear rooms also retain their chimney breasts, but no fireplaces are in situ.

Second Floor

- 02.2.11** The second floor level is deemed to have experienced the greatest alteration, with the removal of secondary staircase. The staircase layout has also been altered (identical to first floor level) with access from / to the staircase via the front room only.
- 02.2.12** Modern partitions have been added to separate the front and rear rooms in order to create office / storage spaces.
- 02.2.13** In terms of historic interest and features – there are historic shutters and timber aprons at this level, albeit the shutters have been painted shut.

Third Floor

- 02.2.14** The third floor has a modern later addition staircase and is completely open plan. The rear elevation at this level features one sash window and a patio door which presents a non-uniform appearance.
- 02.2.15** In terms of historic interest and features – the chimney breast to the rear room is discernible however other than this no historic features remain at this level.

03. PLANNING HISTORY

03.1.1 Camden's online database provides the following planning history for the site. As demonstrated below there was a 2004 application which previously approved the change of use of the building from office to a single-family dwelling.

LPA APPLICATION REFERENCE	DESCRIPTION OF DEVELOPMENT	APPROVED
2004/1512/P / 2004/3115/L	Change of use from office (Class B1) to single dwellinghouse (Class C3) with associated alterations. <i>N.B These planning and listed building consents approved a 6-bedroom single family dwelling.</i>	17-09-2004
9370090	Approval of the brick sample for the reinstatement of the courtyard pursuant to additional condition 03 of Listed Building Consent dated 7th January 1993 (Reg no HB/9270168) for internal refurbishment and reinstatement of the rear courtyard.	11-05-1993
9270168	Internal refurbishment and the reinstatement of the rear courtyard as shown on drawing numbers MF31/01 MF31/02 existing and proposed MF31/07.	21-09-1992
11063	Certificate of Existing Use	20-03-1972
HB310	Demolition of existing rear additions rebuilding of new extension at ground 1st and 2nd floor levels, installation of lift replacement of internal doors removal of internal partitions cleaning and re-pointing of brickwork and replacement of existing windows by new sashes.	18-06-1971

04. PRE-APPLICATION - 2023/3517/PRE

04.1.1 In line with Paragraphs 39-46 of the National Planning Policy Framework (NPPF), the Applicant has actively engaged with Camden Council ("The Council") in order to improve the efficiency and effectiveness of the planning application process. The proposals have been the subject of pre-application discussions – a site visit was held with planning and design and conservation officers of the Council on 20th November 2023, with follow up formal written advice received on the 28th November 2023 under LPA reference. 2023/3517/PRE.

04.1.2 A summary of the pre-application response received and the Applicant's response is shown tabulated below.

TOPIC	LB CAMDEN COMMENTS AT PRE-APPLICATION STAGE	APPLICANT RESPONSE / SUBSEQUENT AMENDMENTS MADE
Land use – loss of existing employment floorspace	<p>Policy E2 of the Local Plan seeks to protect premises or sites that are suitable for continued business use.</p> <p>Where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise.</p>	In accordance with Officers comments – a Marketing Evidence Report has been prepared by Ashurst Real Estate and submitted with the planning application. The marketing report demonstrates the marketing exercises which have taken place and conclusively, that there is no realistic prospect of demand to use no.52 for an employment use. The Marketing Evidence Report and its findings are discussed in further detail in Section 7.4 below.
Land use – proposed residential use	<p>The addition of new housing is supported by Policy H1, which seeks to increase the housing supply within the borough. Although the provision of 1x single-family dwellinghouse does not fully comply Policy H7, the reinstatement of the building into its original and historic use as a single dwellinghouse is welcomed and supported by Policy D2. It is also recognised that the internal</p>	<p>The proposals remain as per those at pre-application stage and will deliver a 4-bedroom family home. The reinstatement of the building to its original and historic use as a single family home is supported by the Council and Local Plan Policy D2.</p> <p>In assessment of the Council's comments on Local Plan Policy H7, policy Criteria c to h acknowledges that the Council will</p>

	<p>floorplan, given the building's narrow width, is not necessarily suitable or viable for long-term office use. Thus, the principle of 1x single-family dwellinghouse on the site is supported pending the submission of marketing evidence as outlined above.</p>	<p>take a flexible approach to assessing the mix of dwelling sizes and that it will not be appropriate for every development to focus on higher priority dwellings listed in Table 1. Supporting Paragraph 3.190 further recognises that there is a demand for all dwellings of every size in the borough, this includes 4-bedroom family dwellings, which this application will deliver.</p>
Affordable Housing	<p>Local Plan Policy H4 requires a contribution to 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.</p> <p>The Council will accept a payment in lieu where development has a capacity for fewer than 10 dwellings – estimated at £42,994.</p>	<p>The Applicant recognises the importance of Policy H4 and is happy to agree a payment in lieu of affordable housing to be discussed and secured within a S106 agreement. It should be clarified that the proposed GIA is 401 sq.m not 429.94sqm. The correct and updated payment in lieu figure is therefore £40,100.</p>
Standard of Accommodation	<p>The proposal consists of 1x single-family dwellinghouse occupying all levels of the building. In terms of space standards, the new dwelling significantly exceeds the national space standards for a four-bedroom, eight-person dwelling at 429.94sqm, with the required GIA being 130sqm. The dwelling would be dual aspect (east and west) and would receive sufficient daylight/sunlight throughout the year. Outdoor amenity space is provided in the form of a rear</p>	<p>As recognised by the Council, the new dwelling will significantly exceed national space standards. However, it should be highlighted that the proposed GIA is 401 sq.m not 429.94 sq.m as cited in the pre-application response. The new dwelling would therefore exceed space standards by +271 sq.m. As recognised in the pre-application response the new dwelling is dual aspect and; will receive sufficient daylight / sunlight. The quality of residential accommodation is also improved</p>

	garden and roof terrace at attic level.	through the rear garden and roof terrace. The proposals therefore accord with Local Plan Policy H6 and will provide a high quality, accessible new home.
Design and Conservation – Exterior Alterations	<p>The replacement of the external front lightwell staircase is acceptable. The reinstatement of the rear lower ground floor lightwell is acceptable.</p> <p>Option 4 for the changes to the window and doors on the rear fenestration at ground floor level is supported and does not raise any concerns from a heritage perspective.</p> <p>PV panels on the roof are acceptable – submitted roof plans should show their location. The Air Source Heat Pumps in the lower ground floor lightwell are acceptable, subject to confirmation noise will not affect amenity.</p>	<p>The proposals remain as per those submitted and supported by the Council at pre-application stage. Option 4 (changes to ground floor windows and doors) which was supported by Officers is shown on the formal submitted planning drawings.</p> <p>A noise report has been submitted and confirms the ASHP units with acoustic enclosures will ensure no harm to residential amenity.</p>
Design and Conservation – Interior Alterations	<p>The removal of the existing office floorplan partitions, bathrooms and fixtures is supported – none of these are historic.</p> <p>The erection of partitions to create a residential dwelling is acceptable.</p> <p>The reinstatement of original historic architectural features including fireplaces, cornices, ceiling roses, panelled doors, architraves, and skirting throughout is all considered acceptable and will help preserve</p>	<p>The proposals remain as per those submitted and supported by the Council at pre-application stage.</p> <p>The Applicant is happy to agree a suitably condition requiring details of the interior fixtures and detailing to be submitted.</p>

	<p>and enhance the character and setting of the listed building.</p> <p>Details of the interior fixtures and detailing will need to be submitted with any future application.</p>	
Amenity	<p>The proposed change of use is not considered to give rise to any amenity impacts to neighbouring residential occupiers, as the predominant land use in the area is residential.</p> <p>Given the modest scope and location of the proposed alterations, they are not considered to cause harm to the amenity of neighbouring residential occupiers in terms of loss of light, outlook, and privacy.</p>	<p>The proposals remain as per those submitted and supported by the Council at pre-application stage. As confirmed in the Councils formal pre-application response the change of use will not give rise to amenity impacts given the predominant residential uses in the area and, the modest alterations proposed.</p>
Sustainability	<p>The current proposal would result in the retention and refurbishment of the existing building which is welcomed.</p>	<p>The proposals have been designed to be sustainable and will move from a gas system to electric. This is in direct accordance with Local Plan policies CC1 and CC2. The sustainability credentials the application will deliver are discussed in further detail in Section 7.6 below.</p>
Transport	<p>Cycle parking provision can be provided within the dwelling given the dwelling size. In accordance with Local Plan Policy T2 the new dwelling should be car free.</p>	<p>In accordance with the Councils comments cycle parking will be provided within the dwelling.</p> <p>The applicant is happy to agree the dwelling be car free development – to be secured within a s106 agreement.</p>

05. THE PROPOSAL

- 05.1.1** The Proposals have been prepared by Miltiadou Cook Mitzman Architects with heritage input from Handforth Heritage.
- 05.1.2** The proposed works will reinstate no.52 back to its original residential use – in the form of a 4 bedroom family dwelling. Alongside this, the proposals will improve the quality of the floorspace, the thermal efficiency, general enjoyment of the building and represent an opportunity to reinstate historical features.
- 05.1.3** The proposals can be separated into the following principal works:

EXTERNAL WORKS

Front Elevation

- / Removal of non-traditional metal awning above the front entrance of the building.
- / Replacement of front entrance ramp with traditional and more historically in-keeping entrance steps
- / Installation of new front door
- / Demolition of non-original external staircase in front lightwell and replacement with new staircase. The new staircase will be positioned away from the front elevation
- / Replacement of third floor timber sash windows to match existing

Rear Elevation

- / Partial demolition of ground floor slab to create rear lightwell – as per 1914 plans.
- / Replacement of non-original French doors and 2no. sash windows at rear ground floor level with contemporary patio doors and two windows – this is 'Option 4' which was referenced and supported by LB Camden in their pre-application response.
- / Replacement of French doors and window at roof level with – designed to match existing but incorporate double glazing.
- / Installation of two Air Source Heat Pumps at lower ground floor lightwell level.

INTERNAL WORKS

*Removal of lift and service cupboard across all floors

Lower Ground Floor

- / Demolition of non-original partitions
- / Demolition of wall in front lightwell to open up the pavement vault. This will create two vaults (1 already existing). This is as per plans dated 1914.

Ground Floor

- / Demolition of non-original partitions
- / Reinstatement of fireplace in front living room
- / Reinstatement of cornice
- / Reinstatement of ceiling rose in both the front living room and rear kitchen
- / Reinstatement of rear lightwell – in accordance with previously dated 1914 plans
- / Reinstatement of panelled doors, architraves and traditional skirting boards throughout
- / Reinstatement of original door opening from the hallway

First Floor

- / Demolition of non-original partitions and WC sanitaryware and WC partitions
- / Reinstatement of fireplace in front sitting room
- / Reinstatement of cornice
- / Reinstatement of ceiling rose in front sitting room and rear music room
- / Reinstatement of panelled doors, architraves and traditional skirting boards throughout

Second Floor

- / Demolition of non-original partitions and WC sanitaryware and WC partitions
- / Reinstatement of fireplace in front master bedroom

- / Reinstatement of cornice in master bedroom and dressing room
- / Reinstatement of panelled doors, architraves and traditional skirtings throughout

Third Floor

- / Demolition of non-original partitions and WC sanitaryware and WC partitions
- / Reinstatement of partitions as per 1971 plans
- / Reinstatement of cornice in the stairwell
- / Reinstatement of panelled doors, architraves and traditional skirtings throughout.

06. RELEVANT PLANNING POLICIES

06.1 GOVERNMENT GUIDANCE

06.1.1 The proposals have been designed in line with, and have given due consideration to, the adopted Development Plan for Camden. The adopted Development Plan consists of the following documents:

- / London Plan (2021)
- / Camden Local Plan (2017)

06.1.2 Material considerations include the National Planning Policy Framework (NPPF – December 2023) and the local planning authority's supplementary planning guidance (SPG or CPG) documents. The following planning guidance documents are therefore considered relevant to the proposals:

- / Amenity CPG (January 2021)
- / Bloomsbury Conservation Area Appraisal and Management Strategy (2011)
- / Design CPG (January 2021)
- / Developer Contributions (March 2019)
- / Employment Sites & Business Premises (January 2021)
- / Housing CPG (January 2021)
- / Transport CPG (January 2021)

07. PLANNING CONSIDERATIONS

07.1.1 The legal framework for determining planning applications is set out in section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. These state that a Local Planning Authority must have regard to the provisions of the development plan and other relevant material considerations when considering an application for planning permission; and that determination of the application must be in accordance with the development plan unless material considerations indicate otherwise.

07.1.2 The application is supportive of both national and local plan policy objectives for the reasons outlined below.

07.2 LAND USE – DELIVERY OF A NEW FAMILY HOME

07.2.1 The principle of development remains unchanged from the change of use sought in 2004 under application LPA References 2004/1512/P and 2004/3115/L. The Applicant proposes the change of use of No.52 to restore it to its original use as a single-family dwelling.

07.2.2 In policy terms, Local Plan Policy H1 (Maximising housing supply) seeks to maximise the supply of housing in the borough – targeting 16,800 additional homes up to 2030/31. Under Local Plan Policy H1 self - contained homes are recognised as the priority land use of the Local Plan. The proposals directly support this and will deliver a 4-bedroom self-contained family home.

07.2.3 Local Plan Policy H7 (Large and small homes) seeks to secure a range of homes of different sizes that contribute to the creation of mixed, inclusive and sustainable communities. Policy H7 and its supporting text further recognises that the Council will seek a mix of large and small homes in the borough and will take a flexible approach in assessing dwelling sizes – having regard to character of the development and the surrounding area amongst other criteria. In accordance with Policy H7, Doughty Street is a locale which is akin with listed buildings in residential use, with many of the listed buildings having been converted back to residential use over time – as shown in the table below. The reinstatement of no.52 back to residential use is therefore akin with the locale and whilst not implemented was previously approved at the site in 2004.

Property Number	LPA Reference	Description of Development	Approved
39 Doughty Street	2010/1395/P & 2010/1399/L	Change of use of ground, first, second and third floor levels from office (Class B1) to one residential unit (Class C3) (The existing self-contained basement floor level flat remains unaltered).	17/11/2010

40 Doughty Street	2008/2473/P & 2008/3175/L	Change of use from office use (Class B1) to residential use (Class C3) as a single family dwelling, and external alterations including the installation of three rear dormer windows, new spiral staircase, balcony, vents, removal of ground floor timber sash windows with replacement timber framed French doors and removal of first floor flat roof to create external terrace area with decking.	22/04/2009
41 Doughty Street	2010/6055/P	Change of use of basement, ground and first floor levels from offices (Class B1) and maisonette on second and third floor to create a single residential dwelling (Class C3).	08/07/2014
42 Doughty Street	2017/6024/P	Change of use from office (Class B1) to single dwellinghouse (Class C3) with associated alterations.	17/09/2004
43 Doughty Street	2005/0566/P	Change of use from residential and offices (Class C3/B1) to a single dwelling house (Class C3).	06/05/2005
50 Doughty Street	2006/5086/P & 2006/5207/L	Change of use from office (Class B1) to a single family dwelling house (Class C3) involving removal of part of ground floor extension to form a courtyard.	02/03/2007
56 Doughty Street	2006/4199/P & 2006/5738/L	Change of use from existing office use (Class B1) to a single family dwelling house (Class C3).	03/01/2007
57 Doughty Street	2008/0540/P & 2008/0542/L	Change of use and works of conversion from office use (Class B1) on lower ground and ground floors and 3 self contained residential flats on upper floors to create a single family dwelling house (class C3) plus excavation to create new basement extension under whole rear garden; erection of enlarged front dormer and alterations to all rear and front windows.	08/05/2008
60 Doughty Street	2007/3921/P & 2007/3931/L	Change of use from offices (Class B1) to a single family dwelling house (Class C3).	14/12/2007

62 Doughty Street	2010/0187/P & 2010/0189/L	Change of use of a grade II listed building from offices (class B1) to a single dwelling house (class C3) and associated alterations.	12/08/2010
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07.2.4 Whilst it is recognised that 4-bedroom homes are lower on the Councils priority list. Paragraph 3.18.6 of Camden's Local Plan highlights that Camden's existing stock of homes is largely made up of relatively small dwellings. The Local Plan explicitly references the 2011 Census which indicates that 70% of Camden's housing stock is 2 bedroom or lower, the reinstatement of 52 Doughty Street to a 4 bedroom family dwelling would therefore help address the deficiency of larger homes.

07.2.5 Twinned with the above, Paragraph 3.190 of the Local Plan recognises that there is a need and demand for all dwellings. Policy H3 (Protecting existing homes) explicitly states that the Council will favourably consider proposals that create large homes in parts of the borough where there is a relatively low proportion of large dwellings - Holborn and Covent Garden (which the application site is located within) is listed as one of these wards. This application therefore direct addresses a specific housing need in Holborn and Covent Garden ward.

07.2.6 In summary, the pre-application proposals accord with Local Plan Policy and will deliver a large family home in a ward where there is a low proportion of large dwellings. The 4-bedroom home also meets and exceeds national space standards and has been designed to be of high quality in both layout and function. The high residential quality of the proposals, with regard to floorspace quantum, orientation, daylight sunlight and; outdoor amenity space was recognised by the Council in their formal pre-application response.

07.3 AFFORDABLE HOUSING PROVISION

07.3.1 Policy H4 requires a contribution to 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. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.

07.3.2 In accordance with Policy H4 this application will create a new dwelling and will deliver off-site affordable housing in the form of a payment in lieu. The contribution is estimated at £40,100 and will be secured by way of Section 106 agreement.

07.4 LOSS OF OFFICE FLOORSPACE

07.4.1 Local Plan Policy E2 (Employment premises and sites) states that the change of business premises to non-business premises is acceptable in policy terms 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 for similar or alternative type and size of business use has been fully explored over an appropriate period of time. The supporting text to Policy E2 and Camden's Employment & Business Premises CPG highlights that the

Council will take into account the following factors – 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 and whether the business use is well related to nearby land uses.

- 07.4.2** The existing office space at No.52 is cramped and dislocated – this being typical of historic converted floorplates which would have originally been in residential use. The current condition is unfit for modern business purpose needs and is uncompetitive against offices within the locality particularly since COVID and the change in office users needs, consequently the office floorspace currently lies vacant.
- 07.4.3** A marketing report has been prepared by Ashurst Real Estate and submitted with the application. The marketing report confirms evidence of marketing the building for a period of time. It reiterates that no.52 is in poor condition with a substandard specification and that its configuration is not congruent with current market trends and occupier expectations. As demonstrated in Appendix A of the marketing report of 24 interested parties, 6 were office users and 3 were interested for residential use. The office users dismissed no.52 due to its location, isolated from main commercial locations and distance to transport hubs and; its substandard condition. These reasons (isolation from main commercial locations, distance to transport hubs and substandard condition) are not only applicable for office floorspace but all Class E commercial uses. Further, the acceptability of other Class E uses, such as retail, restaurants, gyms and creches / day nurseries would not be appropriate in Doughty Street, which are primarily in their original residential uses.
- 07.4.4** The marketing report further demonstrates that the significant amount of refurbishment required would not be financially viable and would require both structural changes in the market. The 3,000 sq.ft of office floorspace at no.52 represents 0.2% of total accommodation available in the local area. As evidenced in Paragraph 10 of the marketing report – there is 1,350,000 sq.ft of office floorspace to rent within a half mile of no.52, this both represents the existing capacity for prospective office uses but, more importantly, is representative of the office market in this area with a number of vacant properties (2, 9 and 14 John Street) being townhouses with office floorspace laid out over multiple floors (as per the configuration at no.52 Doughty Street). Other cited available floorspace is modern floorspace. The availability of so much office accommodation in the market clearly illustrates a lack of demand even for offices that benefit from a higher specification, better condition / repair and preferred layout / configuration.
- 07.4.5** In summary, the significant amount of refurbishment that would be required to bring the offices up to modern requirements would not be financially viable. Twinned with this the marketing evidence demonstrates there is a lack of demand for no.52 due to its location. By contrast converting the building back to its original intended use will deliver a new family home and is consistent with a prevalent land use change along Doughty Street. The evidence therefore satisfies Local Plan Policy E2 part a. – it is no longer suitable for its existing business use and; b. that the possibility of retaining, reusing, or redeveloping the site for alternative type and size of business use has been fully explored. The loss of office floorspace was also recognised and accepted by the Council in their pre-application response, citing (ad verbum) *'It is also recognised that the internal floorplan, given the building's narrow width, is not necessarily suitable or viable for long-term office use. Thus, the principle of 1x single-family dwellinghouse on the site is supported pending the submission of marketing evidence.'*

07.5 HERITAGE AND DESIGN

- 07.5.1** The NPPF stipulates that the creation of high-quality buildings is fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development. Paragraph 200 requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. In support of this application a Heritage Statement has been produced by Handforth Heritage and provides a detailed assessment of the existing building and the heritage impact of the proposed works. This has also been informed by pre-application advice received by Camden.
- 07.5.2** In regard to the heritage significance of the building, the Heritage report confirms that no.52 has undergone so much internal and external change (to the rear), that it is now primarily the principal facade that is of architectural and historic significance due to its contribution to the wider listed terrace. Some internal features of interest do survive, but these are limited to most of the principal staircase, joinery around the front windows and chimney breasts.
- 07.5.3** At a National Planning Policy Level – NPPF Paragraph 208 states that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'* In direct accordance with Paragraph 208, the proposals reinstate the heritage asset of no.52 back to its original use as a single family dwelling and will return it to its optimum viable use, as evidenced by the submitted marketing report. As will be further demonstrated below, the proposals lead to less than substantial harm and will deliver significant enhancements to the heritage assessment. The application is therefore supported at national planning policy level.
- 07.5.4** Local Plan policies D1 (Design) and D2 (Heritage) apply. Policy D1 highlights that development should respect local context and character, comprising details and materials that are of high quality. Policy D2 highlights that the Council will not permit the loss of or substantial harm to a designated heritage asset. In accordance with the NPPF and Local Plan policies the heritage statement confirms that converting No.52 back to its original use, many original features will in fact be restored. These enhancements to both the listed building and Bloomsbury Conservation Area are discussed in detail below.

ENHANCEMENTS TO THE LISTED BUILDING AND BLOOMSBURY CONSERVATION AREA

- / Removal of the incongruous awning above the front entrance. The awning is not a traditional feature of a residential Georgian dwelling. **Enhancement to the listed building and conservation area.**
- / Removal of the existing cementitious non-original front tiled ramp and replacement with traditional front steps, in-keeping with surrounding properties including no's 51 and 53. **Enhancement to the listed building and conservation area.**

- / Reinstatement of the second front vault – as per historic plans for the building including a historic drainage plan from 1892, which can be found in the heritage statement. **Enhancement to the listed building.**
- / Reinstatement of the rear lightwell at lower ground floor level – a previous feature of the building as shown on a historic 1914 plan for the building. **Enhancement to the listed building.**
- / Repositioning of the front lightwell staircase away from the front façade to allow for a greater appreciation of the facade. **Enhancement to the listed building and conservation area.**
- / Removal of lift and service room at the centre at the floorplate. This will restore the floorplan to its original plan form – particularly on principal levels such as first floor. **Enhancement to the listed building.**
- / Reinstatement of fireplaces, ceiling roses and cornices. **Enhancement to the listed building.**
- / Reinstatement of panelled doors, architraves and traditional skirtings. **Enhancement to the listed building.**
- / Reinstatement of original door openings – this will reconnect the staircase landing to provide direct access into the living room at ground floor level; the games room at first floor level and bedroom (no.3 on plans). **Enhancement to the listed building**

07.5.5 The proposals also include the installation of secondary glazing across all floors. The existing poor condition single-glazed French doors and single window at rear third floor level will be replaced with a double-glazed window and door to match existing. PV panels will be installed on the roof. **This would represent a neutral impact in listed building terms.**

07.5.6 In summary, the proposals will reinstate original features, plan form and use. The acceptability of the internal and external alterations was supported by officers in the Councils formal pre-application response. The proposals are therefore in accordance with Local Plan and national policy context in heritage terms.

07.6 SUSTAINABILITY AND CLIMATE CHANGE MITIGATION

07.6.1 Local Plan Policy CC1 (Climate change mitigation) and Policy CC2 (Adapting to climate change) outlines the Council's requirements for all development to minimise the effects of climate change and meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy emphasis to reduce carbon emissions and improve the energy efficiency of buildings is entrenched at national and strategic policy too.

07.6.2 In direct accordance with all policy levels, the building will improve the buildings sustainability and future co2 reduction by moving from a gas energy system to electric – in the form of two Air Source Heat Pumps (at lower ground floor lightwell level) and PV panels (at roof level). The introduction of double glazing at rear third floor level and secondary glazing across the building will further improve the thermal efficiency of the building.

07.7 AMENITY

- 07.7.1** Local Plan Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for redevelopment that would not harm the amenity of neighbouring residents.
- 07.7.2** As recognised in the Council's pre-application response the proposed change of use is not considered to give rise to any amenity impacts to neighbouring residential occupiers, as the predominant land use in the area is residential. The Council also recognised that the installation of ASHPs (model: 2 no. Vaillant aroTHERM Split 12kW) within the new rear lightwell is considered acceptable. The submitted noise assessment by Zona Acoustics confirms that the ASHPs with acoustic enclosure will meet the Councils required noise limits.
- 07.7.3** Conclusively, the proposals do not represent any harm to neighbouring amenity.

08. CONCLUSION

- 08.1.1** In summary, the proposals represent an opportunity to restore No.52 Doughty Street to its original use, delivering a 4-bedroom family dwelling within the Holborn and Covent Garden Ward, a ward identified as low on large dwellings. The change of use from office to residential was previously approved in 2004 and is a prevalent change of use along Doughty Street.
- 08.1.2** As demonstrated in the submitted Heritage Assessment the building has been heavily altered over time. The external works are limited but will significantly improve the character of the listed building and its relationship with the Bloomsbury Conservation Area. The internal works will reinstate original plan form to create an enjoyable family dwelling for future residents. As recognised in the submitted marketing assessment, the existing office floorspace is not fit for purpose or viable and justification of its loss has been evidenced in a marketing report.
- 08.1.3** A summary of the many significant planning and listed building benefits this application will deliver is outlined below:
- / Delivery of a 4-bedroom family home within the Holborn and Covent Garden Ward, a ward which is identified within the Local Plan as low on large family dwellings.
 - / Provision of a family dwelling (401 sq.m) which significantly exceeds national space standards by +271 sq.m.
 - / Reinstatement of no.52 back to its original and historic residential use.
 - / Provision of affordable housing in the form of a payment in lieu.
 - / Significant heritage enhancements to reinstate traditional features and detailing lost in a highly altered building.
 - / A high environmentally performing home – transferring a building currently run on a gas energy system to electric in the form of Air Source Heat Pumps and Photovoltaic panels.
- 08.1.4** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Application Scheme is in accordance with both the adopted development plan and planning permission should therefore be granted.
- 08.1.5** We trust that the submitted documents and supporting information is sufficient for the Council to validate the application and we look forward to a swift and positive outcome.

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