

# NEWMARK

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

One Fitzroy 6 Mortimer Street  
London W1T 3JJ  
Tel. +44 (0)20 7493 3338  
[nmrk.com/en-gb](http://nmrk.com/en-gb)

**Our ref: U0029133/GBR/TEY**

**Your ref: PP-13863973**

**6 May 2025**

Dear Sir/Madam

**11 Doughty Street, London WC1N 2PL**  
**Applications for Full Planning Permission and Listed Building Consent**  
**Town and Country Planning Act 1990 (as amended)**

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

We have been instructed by our client (the 'Applicant'), Tower Pension Trustees Limited, to submit an application for full planning permission and listed building consent for change of use and associated internal and external physical works at 11 Doughty Street, London WC1N 2PL (the 'Site').

Full planning permission is sought for:

**"Change of use from office to residential to form a single-family dwelling; associated internal and external alterations".**

Listed building consent is sought for:

**"Internal and external alterations in association with use of 11 Doughty Street as a single-family dwelling".**

## **Site and Surroundings**

The Site is located on the west side in the middle of Doughty Street. The building is a late 18<sup>th</sup> century Grade II listed former townhouse set over basement ground, and two upper floor levels, with additional accommodation within a mansard roof. The Site has been and is currently used as legal chambers. Much of the original historic fabric remains, and more recent substantial alterations have been limited to reconstruction of the closet wing, construction of a large ground floor extension to the rear, and removal of several walls in

the basement. There have been some superficial alterations which include the introduction of false ceilings, new cornice work, and some new joinery on upper floors in association with its use as a commercial building.

The Site's context is historic. It sits at the centre of a terrace of listed buildings, from 1-19 Doughty Street (all Grade II). Opposite, 39-47 and 49-62 Doughty Street are also all Grade II listed. No. 48 Doughty Street is Grade I listed and is the former home of Charles Dickens between 1837 and 1839. Doughty Street is a well-preserved late 18<sup>th</sup>- early 19<sup>th</sup> century residential street, comprising of four-storey houses typical of the period. Today, Doughty Street is a blend of residential and commercial uses, with several townhouses having become legal chambers historically. Some properties remain in their intended residential use. More broadly, the Site is located in the Bloomsbury Conservation Area, and is also subject to the following designations as set out in Camden's Local Plan (2017).

- Central London Area (CLA);
- Protected Vistas LVMF 2010 – Blackheath Point to St Paul's Cathedral; and
- Archaeological Priority Area Tier 2 – London Suburbs.

## Planning History

An examination of the Council's online planning register has been undertaken and the relevant planning history is set out in Table 1.

*Table 1 – 11 Doughty Street Planning History*

Reference No.	Description of Development	Status
2022/3756/P & 2022/4667/L	Replacement of existing stepped access to number 10 Doughty Street with a platform lift to provide wheelchair access.	Refused 07-03-2023  Appeal Dismissed 24-06-2024
2022/0240/P & 2022/0690/L	Installation of photovoltaic (solar) panels within central valley of main roof and on flat roof of single storey rear extension at 11 Doughty Street	Granted 14-06-2022
2018/1566/P	Replace and upgrade existing condensers on rear flat roofed extension.	Granted 22-05-2018
2017/3366/L	Internal alterations including the demolition of non-original stud partition walls at ground floor level and strip out of modern ceiling and floor finishes and lighting.	Granted 12-07-2017
LS9904310	Formation of new openings in party wall, as shown on drawing numbers 10050/01, /2, /3; LFCDA/plan 1; /plan 2; plan 1 of 1; photographs numbered 10052/P1 to /P6 (inclusive).	Granted 17-06-1999

8800452	Infilling of central courtyard at ground floor level to create extra office space and erection of a second floor rear extension to provide toilets as shown on drawing numbers 226/1 2 3 4 5 & 6.	Granted 05/01-1989
8870177	Erection of second floor addition to rear extension removal of partitions in rear addition and construction of glazed roof over ground floor courtyard and reinstatement of glazing bars to rear windows as shown on drawing numbers 226/1 2 3 4 5 & 6.	Granted 05-01-1989
8670176	Formation of a link through the party wall at basement level as shown on drawings numbered DS/01A and DS/05.	Granted 16-07-1986
HB92(R) & 7893(R)	The erection of a rear ground floor extension and internal alterations to No. 11 Doughty Street, W.C.1.	Granted 10-06-1970

It is worth also noting that at 52 Doughty Street, planning permission (ref. 2023/5432/P) was granted on 25 September 2024 for the change of use from office to residential to create a single family dwelling.

## Proposal

This Planning Statement should be read in conjunction with the Design and Access Statement (DAS), prepared by Trehearne Architects and the Heritage Impact Assessment (HIA), prepared by Handforth Heritage.

The proposed development would reinstate the original residential use, in the form of a 4-bedroom family dwelling. The proposed development, while making the upgrades necessary for the enjoyment of the building as a home, seeks to take the opportunity to reverse unsympathetic modern interventions and ensure as much historic fabric is preserved and exposed as possible.

## Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:

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

The National Planning Policy Framework ("NPPF") and National Planning Practice Guidance ("NPPG") are both material considerations. As are the following LB Camden supplementary planning guidance (SPG) documents:

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011);

- Design CPG (January 2021);
- Developer Contributions (March 2018);
- Employment Sites & Business Premises (January 2021); and
- Housing CPG (January 2021).

In terms of emerging policy, Paragraph 49 of the NPPF states that local planning policies may give weight to relevant emerging policies, taking into account the stage of preparation of the emerging plan, the extent to which there are unresolved objections to emerging policies, and the degree of consistency those emerging policies have with regard to the wider development framework. LB Camden consulted on the Draft New Camden Local Plan between 17 January and 13 March 2024. Camden are currently considering responses received and are expected to publish an updated version of the draft plan for further consultation in Spring 2025. Given the stage of the new Local Plan, it is considered to attract limited if any weight in the determination of planning applications and it therefore has not been considered in this assessment.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regards to listed buildings, require the planning authority to have “special regard to the desirability or preserving the listed building or its setting or any features of special architectural or historic interest which it possesses”. In respect of conservation areas, it is required that “special attention shall be paid to the desirability of preserving or enhancing the character of appearance of that area”.

## **Assessment**

### Principle of Development

Camden Local Plan Policy H1 seeks to exceed the target for additional homes, particularly self-contained homes, by recognising these as the priority land use. The proposed reinstatement of residential use at 11 Doughty Street would accord with Policy H1 by contributing to meeting and exceeding the target for additional homes within the borough and will deliver a self-contained home.

Local Plan Policy H7 states the Council will aim to secure a range of homes of different sizes that contribute to creation of mixed, inclusive and sustainable communities. Policy H7 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. 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. Holborn and Covent Garden is listed in paragraph 3.76 as a ward with a low proportion of large dwellings. It is acknowledged that while 4-bedroom homes are lower on the Council’s priority list, the reinstatement of 11 Doughty Street to a 4-bedroom family dwelling would nevertheless help address a deficiency in larger homes.

Moreover, the recently approved change of use of 52 Doughty Street demonstrates that the optimum beneficial use of the buildings on this street is residential.

In summary, the principle of the proposed residential use is in accordance with Local Plan policy and will deliver a large family dwelling, that meets and exceeds nationally described space standards, in a ward with an identified low proportion. The building was designed and built for residential use. The proposed physical works, described in the DAS and HIA, will ensure high quality living accommodation is reinstated.

#### Affordable Housing

Local Plan Policy H4 requires that a contribution to affordable housing is made by all developments that provide one or more additional homes and involve a total addition of 100sqm residential floorspace. 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.

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 £109,497, based on a total floor area of 364.99sqm and will be secured by way of Section 106 agreement.

#### Loss of Office Use

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 the site or building is no longer suitable for its existing business use, and 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 notes that the Council will take into account a range of following factors, including 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.

The current tenant has given notice that it will be vacating the premises owing to the fact that they no longer provide suitable or viable offices for a modern set of chambers. The premises are expensive to maintain and operate with limited heating, air-conditioning, comfort-cooling facilities. These are unable to sustain an appropriate or comfortable working environment particularly where there are several people working together or where IT equipment is being used. In addition appropriate office lighting, communication systems and computer cabling etc are difficult to install and maintain. The floor-plates are split into small offices isolated both horizontally and vertically that prevent collaborative work between individuals and teams. They are not conducive to the flow of information or people within an office environment. The basic domestic toilet/bathroom and kitchen/restroom facilities cannot cope with the number of people who regularly attend the premises let alone guests

or functions. A particular difficulty is the lack of facilities for people with restricted mobility, wheelchair users or people with impaired vision. There is no lift installed and the premises cannot be adjusted for entry and use by wheelchair users. The cramped awkward layout means there are numerous areas of potential risk for people with limited mobility and/or impaired vision. Previous planning decisions mean it is not possible to create a DDA compliant workspace for members of chambers, clients or guests attending the premises and that is not acceptable in a modern working environment.

As has been demonstrated, the existing office is in a poor condition, is cramped and has limited, ageing services. Its current state is unfit for modern office needs and is unappealing to modern office occupiers, who require high quality fit outs and on-site amenities. A marketing report has been prepared by Farebrother and is submitted in support of this application. The report provides evidence of the marketing of the building since September 2024 and provides a detailed assessment of the failures of the existing building as an office that contribute to it being unattractive to potential occupiers. The report also provides a summary of availability in the Midtown office market, in addition to providing analysis on the grades of office stock on the market, availability and take-up.

The Farebrother report states that 11 Doughty Street falls into 'Second-hand Grade B', which is poor quality office space. It is noted that just 3% of total availability in Midtown is Grade B owing to the fact that landlords acknowledge the need to refurbish space to ensure it is income producing. Farebrother's analysis of the existing building and its position within the market is corroborated by the lack of interest since marketing commenced.

The marketing campaign has included a bespoke set of marketing details, which highlight the property's selling points. The property was listed on Farebrother's website in addition to third-party sites such as Rightmove, CoStar and LoopNet. In addition, the availability was also circulated to over 1,500 Central London office agents on Agent's Society, which is used for all agent-led office leasing requirements. Despite the extensive outreach just 12 enquiries have been made, including one from Rightmove. These 12 enquiries resulted in no inspection and the general feedback from agents was that "the property fell short of the standard that their clients were looking for, with parties citing the specification, lack of amenity and small floor plates as a reason to discount the property and focus elsewhere".

The marketing report conclusively demonstrates that the building in its current form has no prospect of being let and that that prospect would not be improved without significant investment to improve floorplates, services, and provide on-site amenities, including end-of-journey facilities.

In addition to a marketing exercise, a cost analysis have been undertaken to establish the cost of basic refurbishment works that would be required to retain the building in office use and bring the accommodation up to an appropriate and attractive standard. The cost report has been prepared by Metric and is submitted in support of this application. Metric's report demonstrates that even a very basic refurbishment, which comprises the upgrading of M&E and services and modest general upgrading would cost in excess of £1.1m. This level of works would not impact the historic significance of the building but would fail to deliver on much sought after amenity facilities and the site would remain inaccessible in terms of the

Equality Act 2010. The required capital expenditure for continued office use at the site is significant for only modest improvements and given the prevailing rents on Doughty Street it is considered unviable for any developer or owner-occupier. It is worth noting that planning permission and listed building consent (refs. 2022/3756/P & 2022/4667/L) were refused on 7 March 2023, with the subsequent appeal dismissed on 24 June 2025 which sought to replace the stepped access with a platform lift to enable disabled access. It is therefore clear that the building is unviable and impractical for continued use as office accommodation.

### Design and Heritage

The NPPF directs local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and the level of detailed assessment should be 'proportionate' to the assets' importance. (Paragraph 194).

Paragraph 207 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. Paragraph 212 requires that great weight should be given to the asset's conservation when considering the impact of a proposed development on the significance of a designated heritage asset. Paragraph 213 clarifies that any harm to significance should require clear and convincing justification. Paragraphs 214 and 215 require a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development.

With regards to conservation areas and the settings of heritage assets, paragraph 219 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

Local Plan design Policy D1 seeks to secure high quality design in development, requiring that local context and character is respected, that the development is sustainable in terms of design, construction and operation, that details and materials complement local character, that the building integrates well with the surrounding streets and open spaces, and that the building is inclusive and accessible.

Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. This includes a general presumption in favour of retaining buildings that make a positive contribution to the character and appearance of a conservation area.

The proposed physical works are required to enable the proposed change of use and deliver a single-family dwelling. The property could not be subdivided into a flat due to the impact that associated physical works would have on the listed building. The extent of the proposed works has been carefully curated to ensure the special architectural and historic interest of the building is preserved, while reversing some unsympathetic modern interventions and facilitate the optimum and original use of the building as a single-family dwelling, a clear heritage benefit.

The residential floorspace to be delivered will be high quality. It will far exceed the nationally described space standards, the property is dual aspect which will ensure excellent levels of natural light, and benefits from substantial external amenity space.

The application is supported by a Heritage Impact Assessment, prepared by Handforth Heritage, which provides full details of the proposed physical works and the attributable level of harm.

The proposed development is considered to enhance the significance of the listed building and preserve the character and appearance of the conservation area. The proposed development is considered therefore to comply with the NPPF and Camden Local Plan Policy C6, D1 and D2.

## Sustainability

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 proposed development will breathe a new lease of life into the building, ensuring its long-term future as a single-family dwelling. Ageing plant equipment associated with the existing office use will be removed and will not be replaced given the proposed use has a lesser requirement for mechanical heating and cooling. Overall, the minimalist interventions in the building that are necessary to deliver the optimum use of the building are considered sustainable. The proposed development therefore accords with Policy CC1 and CC2.

## Amenity

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.

The proposed development is not considered to give rise to any amenity impact that would affect neighbouring residents or sensitive receptors.

## **Summary**

The proposed development represents an opportunity to restore No.11 Doughty Street to its original use in a building where there is no further demand for commercial use, delivering a 4-bedroom family dwelling within the Holborn and Covent Garden Ward, a ward identified as low on large dwellings. This would be undertaken in a way which would enhance the building's heritage features. Accordingly, we consider that this application should be granted planning permission and listed building consent.

## **Application Documents**



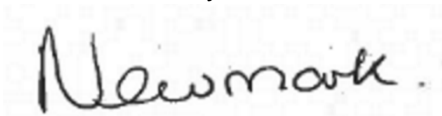
In accordance with the Council's validation requirements, the following documents, along with this Planning Statement, have been submitted via the Planning Portal:

- Completed Application Form, prepared by Newmark;
- CIL Form, prepared by Newmark;
- Site Location Plan, prepared by Trehearne Architects;
- Existing, Demolition and Proposed Drawings, prepared by Trehearne Architects;
- Design and Access Statement, prepared by Trehearne Architects;
- Historic Building Record, prepared by Trehearne Architects;
- Statement of Significance and Heritage Impact Assessment, prepared by Handforth Heritage;
- Marketing Evidence Report; prepared by Farebrother; and
- Office Refurbishment Cost Report.

The requisite planning application fee of £648 has been made via the Planning Portal. There is no fee associated with an application for listed building consent.

We trust the information submitted in support of this application is sufficient for validation, and we look forward to your confirmation of this in due course. If you have any queries, please do not hesitate to contact Tom Eyres (020 7333 6429) of this office.

Yours sincerely,

A handwritten signature in black ink that reads "Newmark." The signature is written in a cursive, slightly stylized font.

**Newmark**

[Gary.Brook@nmrk.com](mailto:Gary.Brook@nmrk.com)

+44207 333 6311  
+44 755 774 2363

Enc. As above