
Goodenough College

Planning Statement

In Support of a Full Planning Application
for the Subdivision of a Single Residential
Unit to 2 no. Residential Units, and
Associated Alterations to the Existing
Front Elevation and Roof

at 19-20 Doughty Mews,
London WC1N 2PF

11 August 2014



Our Ref: CB/lh/615/WC1/50/1

51 Great Marlborough Street
LONDON
W1F 7JT

0870 777 6292

www.rapleys.co.uk

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1 INTRODUCTION

1.1 This statement has been prepared by Rapleys LLP on behalf of Goodenough College to support a full planning application at 19-20 Doughty Mews, London, for the subdivision of a single residential unit to provide 2 no. self-contained residential units and associated external alterations.

1.2 The statement considers the following:

- (i) The site and surroundings;
- (ii) The site's background and planning history;
- (iii) The development proposal;
- (iv) Review of planning policy;
- (v) Review of planning considerations, and
- (vi) Conclusions.

2 SITE AND SURROUNDINGS

THE SITE

- 2.1 The site (location plan attached at **Appendix 1**), extends to circa 0.008 ha and is located on the east side of Doughty Mews, to the south of Guilford Street (B502). The site is set within the Bloomsbury Conservation Area.
- 2.2 The site as indicated on the accompanying existing site plan and elevations plan, and site photographs within the accompanying Design and Access Statement (prepared by Roz Barr Architects), comprises the following:
- A 2-storey, dwellinghouse (converted stables building), including a roof terrace;
 - The ground floor comprises a main entrance at 20 Doughty Mews, an adjoining garage, 1 bedroom, toilet/bathroom facilities and stair access to the first floor;
 - The first floor comprises 2 kitchens and 2 living rooms, and
 - The roof terrace contains a glass lantern and 2 rooflights.

SURROUNDINGS

- 2.3 In terms of surroundings (see photographs in accompanying **Design and Access Statement**), the site is located within a predominately residential area.
- 2.4 The site forms part of a line of residential converted stable mews houses (Doughty Mews), with pedestrian/cycle access from the north off Guilford Street (B502), and vehicular access from Roger Street, to the south of the site.
- 2.5 Doughty Mews comprises a single row of buildings whose facades vary due to a number of alterations that have been carried out over time, leaving little evidence of the original facade proportions.
- 2.6 Further beyond, to the north of the site, on the opposite side of Guilford Street (B502) is Goodenough College (London House). To the west of the site are a number of community facilities off Millman Street, and to the south is St George the Martyr Church, a public house and other commercial uses. To the east of the site, is the Charles Dickens Museum located off Doughty Street, and beyond, there is a hotel and mixed commercial uses.

3 BACKGROUND TO SITE AND PLANNING HISTORY

- 3.1 19-20 Doughty Mews is owned by Goodenough College and is currently vacant, however the site has previously operated as a dwellinghouse.
- 3.2 In terms of planning history, available online records (dating back to 1971) confirm the site's residential use for over 40 years. The most recent application on the site was for the fixing of a sundial to the front elevation at 1st floor level (Ref: 2005/4765/P), which was approved in February 2006.
- 3.3 A planning history schedule is included at **Appendix 2**.

4 THE PROPOSALS

4.1 Goodenough College seeks to refurbish and improve the mews house at 19-20 Doughty Mews for the commercial rental market.

4.2 Although there will be no fundamental changes to the use of the site, the single dwellinghouse is proposed as 2no. self-contained flats, with the adjoining garage to be removed.

4.3 The changes include (shown on the accompanying proposed site plan and elevation plan):

4.4 Internal:

- Re-orientation of the main entrance and toilet on the ground floor at 20 Doughty Mews;
- Ground floor toilets/bathrooms and 1no. bedroom to be replaced with separate facilities including 2no. living rooms/area, 2no. kitchen/dining areas, and
- Existing doorway on the first floor between 19-20 Doughty Mews is to be blocked up to create 2 no. self-contained flats comprising: 2 no. bedrooms and bathroom, and 1no. bedroom and bathroom.

4.5 External:

- Removal of the existing garage door, and the reinstatement of the original opening. In addition;
- New windows with existing structural openings and folded metal planters to the front elevation. On the ground floor, obscured glass panel windows at street level and openable clerestory windows are also proposed.
- New access to the roof terrace proposed via a roofhatch;
- Removal of existing glass lantern, and provision of an additional rooflight, and new metal handrail on the roof terrace, and
- Replacement of 2no. existing rooflights.

4.6 In total therefore, the total gross internal area [GIA] (including the roof terrace) of 132 sqm is split between the proposed 2no. residential units as follows:

- No.19 Doughty Mews = 46 sqm (GIA)
- No. 20 Doughty Mews = 75 sqm (GIA), plus 11 sqm roof terrace

4.7 The above changes, although primarily planned to accommodate 2 no. self-contained flats, also seeks to resolve a number of existing issues on site, including:

- Upgrading the existing building fabric and quality of the elevations to 19-20 Doughty Mews, to create synergy with other mews buildings along the street, and

-
- Improvements to the front elevations and layout to provide natural daylight to internal spaces, in particular at ground floor level (which is currently limited due to the existing stable doors), whilst respecting the building's heritage by only restoring the existing building fabric which is structurally in need of repair. Therefore the proposals create a better residential environment for future occupants.

5 RELEVANT PLANNING POLICY AND GUIDANCE

5.1 The purpose of this section is to identify and review planning policy and guidance pursuant to the alternations and refurbishment of the site, contained within National, London and Local Plan policy.

NATIONAL POLICY GUIDANCE

5.2 Relevant Central Government Policy is contained within the National Planning Policy Framework (NPPF) published in March 2012 and its accompanying Planning Practice Guidance (PPG) adopted and launched online in March 2014.

5.3 The NPPF states that the Government's planning policy is underpinned by a presumption in favour of sustainable development, which the document identifies as a *golden thread* running through both plan-making and decision-taking.

5.4 In order to achieve the delivery of sustainable development, the NPPF sets out several underpinning aims which provide the context for the development proposals, namely:

Delivering a Wide Choice of High Quality Homes

5.5 Local Planning Authorities (LPAs) are to plan for a mix of housing, responding to the needs of different groups in the community and to include a range of size/type/tenure that is required in particular locations, reflecting local demand (at paragraph 50).

Requiring Good Design

5.6 The NPPF and PPG confirm that design is a key aspect of sustainable development and should contribute positively to making places better for people. In these terms, paragraph 57 advises that it is important for LPAs to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private development and wider areas of development schemes.

5.7 However, paragraph 59 confirms that planning policies and decisions should not attempt to impose architectural styles or particular tastes and should not prohibit innovation, originality or initiative, through unsubstantiated requirements to conform to certain development forms and styles.

5.8 In determining applications, paragraph 63 confirms that LPAs should attach great weight to outstanding or innovative designs, which help to raise the general standards of an area.

5.9 Furthermore, paragraph 64 advises that LPAs should not refuse planning permission for buildings which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.

5.10 According to the PPG, "good design" responds in practical and creative ways to both the function and identity of a place, and will adapt to the needs of future generations. The PPG also places emphasis on "distinctiveness" and physical aspects including the local pattern of street blocks

and plots, building forms, details and materials, style and vernacular as well as an area's function, history, culture and its potential need for change.

Conserving and Enhancing The Historic Environment

- 5.11 According to the PPG, protecting and enhancing the historic environment is an importance component of the NPPF's drive to achieve sustainable development.
- 5.12 Paragraph 126 of the NPPF confirms that in LPA's should take into account the desirability of new development making a positive contribution to local character and distinctiveness. In addition, Paragraph 128 states that LPAs should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting.
- 5.13 Paragraph 137 of the NPPF confirms that LPAs should look for opportunities for new development in Conservation Areas to enhance and better reveal their significance. Proposals that propose those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Promoting Sustainable Transport

- 5.14 Paragraph 30 of the Framework advises that encouragement should be given to development solutions that support reductions in greenhouse gas emissions and reduce congestion. LPAs should therefore support schemes that seek to encourage and facilitate the use of sustainable modes of transport.
- 5.15 At paragraph 39, it is confirmed that local parking standards for residential (and non-residential) development should take into account:
- The accessibility of the development;
 - The type, mix and use of development;
 - Availability of opportunities for public transport;
 - Local car ownership levels, and
 - An overall need to reduce the use of high emission vehicles.
- 5.16 In addition, the PPG advises that development proposals should promote accessibility and safe local routes, and for this reason, development proposals should promote attractive and well-connected permeable street networks that encourage more people to walk and cycle to local destinations.

Consultation

- 5.17 The NPPF outlines the importance of early engagement with the local community in association with the preparation of planning applications. In particular, at paragraph 190, it is noted that resolving issues at the pre-application stage has added benefit, in terms of assisting ultimately in the timely issue of decisions.

5.18 Notwithstanding this, as the PPG states, there is a “no one-size fits all approach” to providing pre-application services and therefore LPAs are encouraged to take a flexible, tailored approach to the pre-application services they offer, which are appropriate to the nature and scale of the proposed development.

THE DEVELOPMENT PLAN

5.19 The Development Plan relevant to this site comprises:

- (i) The London Plan, adopted July 2011;
- (ii) The Site Allocations Plan, adopted September 2013;
- (iii) The Core Strategy 2010-2025, adopted November 2010, and
- (iv) Camden Development Policies 2010-2025, adopted November 2010.

5.20 The 2014 policies map accompanying these documents confirms that the site is located within the Bloomsbury Conservation Area, with no other designations. The London Plan (2011) confirms that the LB Camden, and thereby the site, falls within the Central London Sub-Region.

5.21 In this respect, there are a range of policies which would be relevant to the proposal, including:

- **London Plan Policy 3.8 (Housing Choice):** Boroughs should work with the Mayor and local communities to identify a range of needs likely to arise within their areas and ensure that new developments offer a range of housing choice, in terms of the mix of housing, sizes and types, taking into account the housing requirements of different groups and the changing roles of different sectors, including the private rented sector in meeting these.
- **London Plan Policies 5.1, 5.2, 5.3, 5.5, 5.10, 7.14 and 7.15:** Future development should meet the highest standards of sustainable design and construction and include measures to reduce carbon dioxide and other emissions, minimise energy use, supply energy efficiently, reduce air/water pollution, manage flood risk and further reduce adverse noise impacts.
- **London Plan Policies 7.1, 7.2, 7.4 and 7.6:** In design terms, developments should seek that, inter alia, they promote inclusive environments that respect local character and make a positive contribution to the locality, including the public realm, streetscape and wider cityscape.
- **London Plan Policy 7.4 and 7.8:** Development should have regard to the form, function and structure of an area, place or street, and the scale, mass and orientation of surrounding buildings, particularly within conservation areas.
- **Core Strategy Policy CS1 (Distribution of growth):** The Council promote the most efficient use of land and buildings in Camden by seeking development that makes full use of its site, whilst taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Council will also promote development in highly accessible parts of the borough.
- **Core Strategy Policy CS5 (Managing the impact of growth and development):** The Council will manage the impact of growth and development with particular consideration given to

providing uses that meet the needs of Camden's population and contribute to the borough's London-wide role, as well as to protecting and enhancing the environment and heritage and the amenity and quality of life of local communities.

- **Core Strategy Policy CS6 (Providing quality homes):** The Council aim to make full use of Camden's housing capacity of housing including to maximise the supply of additional housing to meet or exceed Camden's target of 4,370 additional self-contained homes. The Council therefore aim to seek a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes, including a range of self-contained homes of different sizes to meet the Council's identified dwelling-size priorities.
- **Core Strategy Policy CS13 (Tackling climate change through promoting higher environmental standards):** The Council will require all development to take measures to minimise effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- **Core Strategy Policy CS14 (Promoting high quality places and conserving our heritage):** The Council will require development of the highest standard of design that respects local context and character. The Council will also ensure that Camden's heritage assets including conservation areas are preserved and enhanced.
- **Core Strategy Policy CS19 (Delivering and monitoring the Core Strategy):** The Council will use planning obligations and other suitable mechanisms, where appropriate, to support sustainable development, secure the necessary/ related infrastructure, facilities and services generated, and to mitigate the impact of development.
- **Development Policies Policy DP2 (Making full use of Camden's capacity for housing):** The Council will seek to maximise the supply of additional homes by expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.
- **Development Policies Policy DP5 (Housing size mix):** The Council will seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential floorspace. The accompanying table confirms a 'very high' priority for 2-bedroom market units.
- **Development Policies Policy DP17 (Walking, cycling and public transport):** The Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport, including where appropriate, pedestrian/cycle access to the development.
- **Development Policies Policy DP18 (Parking standards and limiting the availability of car parking):** The Council will seek to ensure that development provide the minimum necessary car parking provision. Development within Controlled Parking Zones and with good accessibility to public transport to be car free, and this will be secured via legal

agreement to ensue that future occupants are aware they are not entitled to on-street parking permits. Developments will also be expected to meet the Council's minimum cycle parking standards.

- **Development Policies Policy DP19 (Managing the impact of parking):** The Council will resist development that creates a shortfall of parking provision in terms of the Council's Parking Standards for bicycles, people with disabilities, service vehicles, coaches and taxis.
- **Development Policies Policy DP22 (Promoting sustainable design and construction):** The Council will require development to incorporate and demonstrate sustainable design and construction measures.
- **Development Policies Policy DP24 (Securing high quality design):** The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design. Developments will be expected to consider:
 - a) The character, setting, context and the form and scale of neighbouring buildings;
 - b) The character and proportions of the existing building, where alterations and extensions are proposed;
 - c) The quality of materials to be used;
 - d) The provision of visually interesting frontages at street level;
 - e) The appropriate location for building services equipment;
 - f) Existing natural features, such as topography and trees;
 - g) The provision of appropriate hard and soft landscaping including boundary treatments;
 - h) The provision of appropriate amenity space; and
 - i) Accessibility.
- **Development Policies Policy DP25 (Conserving Camden's heritage):** The Council will take into account conservation area statements and appraisals and management plans when assessing applications within conservation areas. Development will only be permitted within conservation areas if it preserves and enhances the character and appearance of the area.
- **Development Policies Policy DP26 (Managing the impact of development on occupiers and neighbours):** The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.

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- **Development Policies Policy DP32 (Air quality and Camden's Clear Zone):** The Council will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impact of development schemes in the Central London Area.

Supplementary Planning Guidance and Documents

5.22 Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011)

5.23 The document provides information about the types of alterations and development that are likely to be acceptable or unacceptable in the conservation area, and therefore used in the assessment of planning applications for proposed developments.

5.24 In particular, it is noted that many of the Doughty Mews have been altered, despite being some of the best surviving examples of original mews buildings.

5.25 Camden Planning Guidance (2011/2013)

5.26 Camden Planning Guidance provides advice and information on how the Council will apply planning policies and is a 'material consideration' in planning decisions.

EMERGING POLICY

5.27 In terms of emerging policy, the Policy Officer has confirmed that the Council is currently reviewing the Core Strategy and Development Policies, and updating evidence to support a new 'Local Plan'. Public consultation on the Draft Document is due in Autumn 2014, with final adoption anticipated in Winter 2015.

5.28 In addition, public consultation on the Council's Draft Charging Schedule 2014 ended on 31 July 2014, and according to the Policy Officer, the Schedule is due to be submitted for examination in September 2014, with final adoption set for March 2015.

6 PLANNING CONSIDERATIONS

6.1 From the preceding review and analysis of planning policy, the principle key planning issues relevant to the determination of this application are as follows:

- (i) The principle of an additional residential unit at this site;
- (ii) Design and Amenity, and
- (iii) Transport.

NEW RESIDENTIAL UNIT

6.2 A mix of 1-2 bedroom units are considered to be in accordance with the site's size and context, as well as policies and standards relative to housing choice, size and priority mix within the London Plan (2011) and Development Plan. This has been previously confirmed as acceptable by a Council Planning Officers (Mr Hugh Miller) during the pre-application stage of this application.

6.3 It is considered that the proposed development provides an opportunity to refurbish and enhance the currently vacant property, in order to bring it back into residential use to meet the demands of the commercial rental market.

6.4 The scheme has been designed to respect the residential design standards as far as possible in the context of its existing fabric.

DESIGN AND AMENITY

6.5 Given the longstanding residential use of the property (since 1971), it is considered that its upgrading and reconfiguring should be acceptable in principle.

6.6 Only the existing building fabric which is structurally in need of repair is to be restored to improve the provision of natural sunlight and private amenity for future occupants, whilst also respecting and enhancing the historic mews streetscape and Bloomsbury Conservation Area.

6.7 Further details on design are in the accompanying Design and Access Statement.

TRANSPORT

6.8 The proposed removal of the garage door at 20 Doughty Mews and the reinstatement of the original opening in its place, is in accordance with the site's location within a Controlled Parking Zone and Council policies which seek to promote sustainable modes of travel by reducing the need to travel by car, particularly in relation to sites that have good public transport accessibility.

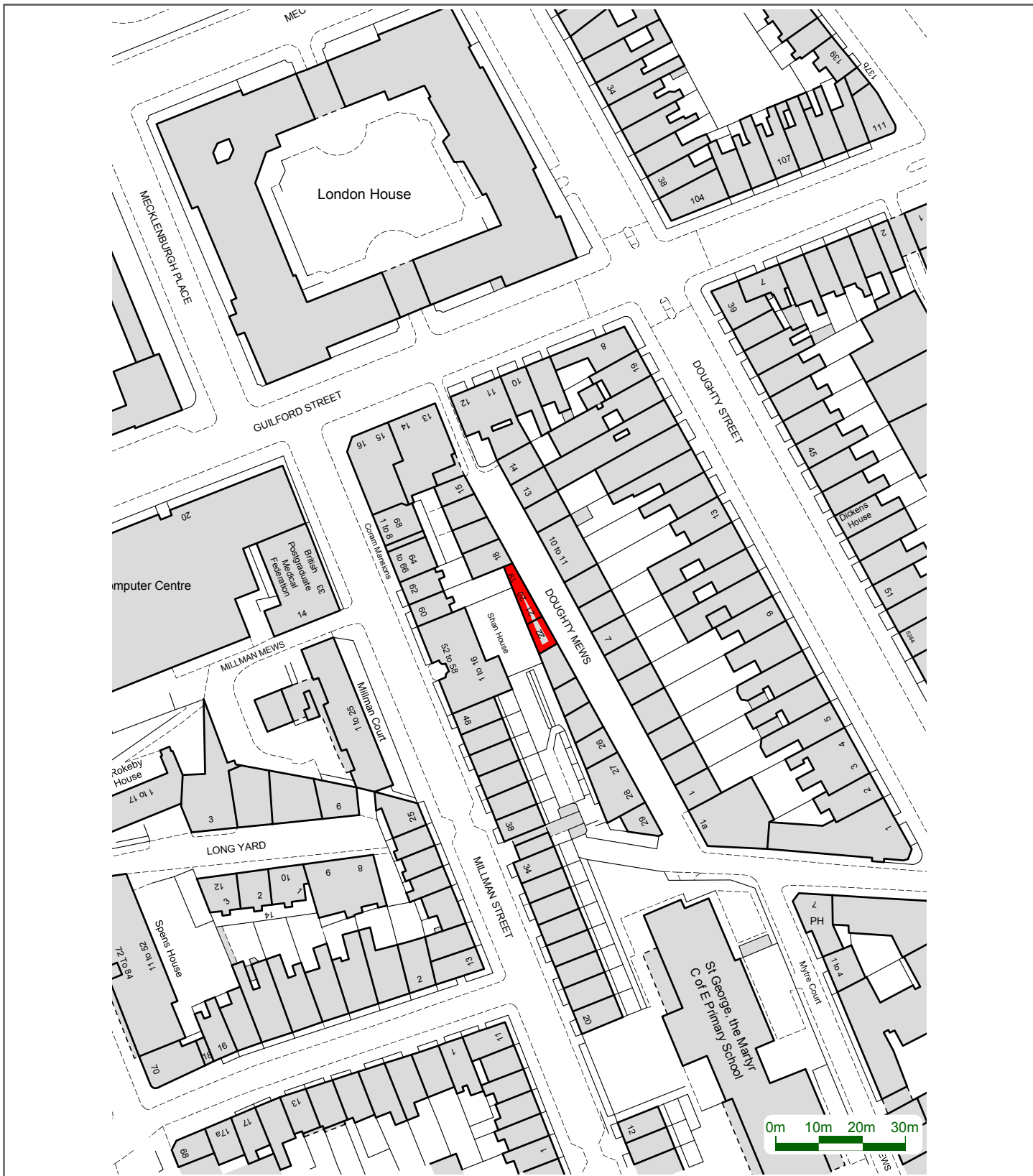
7 CONCLUSIONS

- 7.1 It is concluded that the scheme to upgrade and improve the existing site is in accordance with the Development Plan, constitutes appropriate development within the Bloomsbury Conservation Area, and is acceptable in terms of its proposed numbers and mix of residential units.
- 7.2 Overall, the proposal will respect the scale and character of the local environment, consistent with relevant planning policy and guidance, whilst bringing a currently vacant residential property back into use. The provision of an additional unit therefore also helps housing need.
- 7.3 In these terms, the following analysis/commentary demonstrates that the proposal will accord with the provisions of the Development Plan, and thus, it must be acknowledged that the proposal is acceptable and supportable in planning terms.



Appendix 1
Site Location Plan





SITE LOCATION PLAN
 19-20 Doughty Mews,
 LONDON. WC1N 2PF.



Scale @ A4 : 1:1250
 Plan No. : 615/WC1/50/1_SLP01

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Appendix 2
Schedule of Planning History



Schedule of Planning History

19-20 Doughty Mews, London WC1N 2PF

APPLICATION REF.	DESCRIPTION OF PROPOSALS	DECISION	DATE OF DECISION
2005/4765/P	Fixing of sundial to the front elevation at 1 st floor level of the single family dwellinghouse	Permitted	10-02-06
PS9704766	Use of the 2 properties as a single family dwelling house, as shown by drawing number D.M.1.	Certificate of Lawfulness Granted	17-10-97
9988	Change of use of ground floor of 19/22 Doughty Mews from storage to residential accommodation as an extension to first floor flat, and alterations in connection therewith.	Permitted	16-02-71