

10 John Street
London
WC1N 2EB

Proposed change of use from
office to residential

Loss of Employment Statement

November 2015

Revision A – November 2015

This is a revised version of the statement
dated August 2015 previously submitted to
support application ref: 2015/2037/NEW.
Additional text is marked in red for clarity.



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1.0 SITE HISTORY

According to Horwood's maps of London No. 10 John Street was built between 1799 and 1813.

Initially this terrace was used solely as private residences, however, during the 19th Century it became increasingly common for the houses to be put to Professional use, primarily by Solicitors. Records show that No. 10 was put to mixed residential and Professional use from 1851 after which an extension was built to the rear.

By the end of the 19th century the site was taken over and used as the Holborn Public Library. There was a short period in which the basement and rear of the property were used as a photographic studio but otherwise the building is believed to have been in office use ever since.

Planning consent was granted in 2007 for a change of use to a single-family dwelling, however, this change of use was not implemented.

2.0 PLANNING POLICY

2.01 Development Planning Policy DP13. Policy DP13 generally seeks to retain employment premises however the policy states:

'When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses...'

Later in this statement it is demonstrated that the site is clearly not suitable for other Class B Industrial Uses, hence this policy clearly supports the proposals.

2.02 Core Strategy Policy CS8. Policy CS8 Item 8.8 of the Core Strategy states that:

'...the future supply of offices in the borough can meet projected demand. Consequently, the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing'

This policy clearly supports the proposals.

2.03 Permitted Development Rights. It should be noted that conversion from B1(a) offices to C3 private dwellings is considered Permitted Development around most of the UK. We are aware that the Borough of Camden and all Listed Buildings have exemptions from this legislation, however, it is a very significant backdrop against which to consider any similar proposals such as these.

3.0 PLANNING PRECEDENT

The proposed change of use from Class B1(a) to Class C3 is very typical of properties along this street and it is clear that this area no longer dominated by office use. Planning Department records indicate that out of the 11 properties that make up this terrace 4 are already private dwellings (Nos. 11, 13, 17 & 18) and another 4 have recently achieved Planning consent for change of use back to a dwelling (Nos. 12, 15, 16 & 20).

4.0 UNSUITABILITY FOR ALTERNATIVE CLASS B USES

4.01 Categories. Camden Planning Guidance note 5 (CPG5) defines three categories for grading the suitability of a site for Class B industrial use. These range from the most suitable sites (Category 1) down to the least suitable sites (Category 3).

4.01.1 Category 1 sites are defined by the following characteristics:

- purpose built accommodation;
- predominantly single storey premises;
- clear, high ceiling heights;
- high loading bays and doors (min 5.5m or 18ft high);
- access for large delivery and servicing vehicles both into and around the site;
- 24 hour operation with unrestricted loading access; and
- minimal risk that the 24-hour operation will adversely harm the amenity of neighbouring properties.

4.01.2 Category 2 sites are defined by the following characteristics:

- good access for servicing and delivery;
- slightly more restricted hours of operation than Category 1 sites;
- roller shutter doors;
- clear, high floor to ceiling heights (3-5m);
- lots of natural light;
- level access – normally ground floor;
- flexible neighbouring uses;
- limited number of upper floors with goods lift access; and
- some off street parking.

4.01.3 Category 3 sites are defined by the following characteristics:

- small, isolated premises;
- poor access - narrow streets, small doors, steps;
- no goods lifts;
- little or no space for servicing;
- incompatible neighbouring uses (most often residential); and
- lower ground or basement level.

4.02 Policy Guidance. Items 7.12 & 7.13 of CPG5 state:

‘Category 1 sites are rare in Camden and will always be protected. Category 2 sites are more common in Camden and will usually be protected unless there is very strong marketing evidence to show that they are no longer suitable... Category 3 sites are heavily compromised and may not be suitable for continued industrial use when they become empty or need significant investment, although they could be suitable for office B1(a) space.’

‘We will use these categories to determine which sites and premises should be retained and which can be released for redevelopment.’

It is also suggested that proposals for change of use of Class 3 sites will not need to be supported by marketing evidence.

Based on these classifications it is extremely clear that 10 John Street would be considered a Category 3 site. The clear implication is that this means the site could be released from Class B use and therefore the proposals will not need to be supported by marketing evidence.

5.0 UNSUITABILITY FOR B1(a) OFFICE USE

5.01 Overview. It must be acknowledged that this terrace of properties was always designed and built as private dwellings and so it is no great surprise that this is the use to which they remain best suited. They do not possess the qualities required to be used successfully as modern offices. It is now generally accepted that properties like 10 John Street are no longer viable propositions for attracting business tenants. With every passing day they become less and less attractive on the lettings market for the reasons set out below.

5.02 Layout & Flexibility. Given that the building was originally a house its interior is compartmentalised into numerous rooms. In residential terms the rooms would be considered generous in size, however, they are certainly not attractive to commercial Clients. We also note that some areas are only accessible through other rooms which is also a concern in commercial terms.

There is no possibility of creating large, flexible open plan office space without destroying huge amounts of Listed fabric. It is obvious that this would be resisted strongly by the Planning Department and Conservation Officers making the building unsuitable for its current purpose.

5.03 Building Services. The building's climatic control is woefully short of modern expectations for office space. There are no comfort cooling facilities for the summer and the single glazing makes it difficult to retain heat in the winter. The owner is currently trying to have air conditioning installed at the property but currently Planning and Listed Building consent are not forthcoming.

The building also lacks raised access floors or suspended ceilings which are considered a prerequisite for a successful office development. Without these facilities it is also difficult to undertake routine maintenance or improvements to electrical / mechanical services. It would be physically possible to install suspended ceilings, however, this is likely to harm existing protected Architectural features.

The building also lacks W.C.s at every floor which would make it more desirable to the lettings market. Only the third floor and basement have more than one W.C. so on other levels males and females are required to share.

5.04 Disabled Access. Disabled Access throughout the building is also a serious issue. The building does not have any lift facilities which is a very significant problem. The accommodation is spread over five relatively small floor plates which means that vertical access is a key concern for any commercial tenant.

We do not imagine that Listed building consent would be easy to achieve for the installation of a large commercial lift shaft through the whole building due to the material damage that would be caused to the historic fabric and decorative features. These works would also have a very harmful impact upon the already limited floor area. It is far more likely that a very small domestic platform lift could be considered acceptable. This would be far more suitable for the proposed private residential use rather than the current office use.

We also note that the ground and first floors are both set at varying levels with steps separating the front and rear of the property. This makes disabled access particularly difficult for staff and visitors.

In addition to the lack of W.C.s on every floor noted earlier there is an additional concern that the existing W.C.s are generally too small to be disabled compliant.

- 5.05 **Parking & Servicing.** The site has no parking facilities for staff and there is no convenient way in which commercial deliveries can be made.
- 5.06 **Structural Limitations.** The building was designed and built for private domestic use hundreds of years ago. The BCO provides recommendations for load bearing capabilities of offices in order to account for installation of heavy equipment or dense storage solutions. It is considered highly unlikely that the existing building would be anywhere near the recommended standard.
- 5.07 **Expert Advice.** We have sought the opinions of expert local commercial agents with regard to the proposed change of use. Both Knight Frank and Morgan Lambert & Partners have confirmed that the application site would not be considered an attractive proposition for prospective tenants and that there is virtually no demand whatsoever for offices of this type. Both agents firmly believe that the most suitable course of action for the building is to return it to its original use as a private dwelling. Both agents have written to us confirming these views and also discussing the numerous reasons why the buildings are not considered fit for purpose. Copies of their letters are attached in the appendix to this document for reference.
- 5.08 **Summary.** Technically none of the issues listed above are insurmountable, however, addressing them would require a huge amount of invasive work to be undertaken. The Listed status of the building makes it quite impossible for a suitable office modern environment to be created and so it is far more sensible to allow the building to return to its intended use as a private dwelling.

6.0 CONCLUSION

Through this report we have shown that the existing building is unsuitable for B1(a) office use and does not have any potential whatsoever for conversion to other Class B uses either.

There are modern purpose-built office developments all around the borough with a huge amount more currently under construction. It goes without saying that these will meet all of the requirements for a modern office environment far more successfully than an old house can.

We conclude that by far the most suitable future for the building in terms of practicality and heritage conservation would be to allow it to return to its original purpose as a private dwelling.

7.0 APPENDIX

Supporting letters provided by commercial agents Knight Frank and Morgan Lambert & Partners

Mr Malcolm Cook
Danks Badnell Architects
Kings Stables
3-4 Osborne Mews
Windsor
Berkshire
SL4 3DE

Tuesday 27 October 2015

Dear Mr Cook

10 John Street, Bloomsbury, London, WC1N 2EB

The subject property is located at the junction John Street and Northington Street. To the rear are properties fronting North Mews. The property is five storeys in height including the basement and is three windows wide, built as a residential house during the turn of the nineteenth century, it is Grade II listed and within the Bloomsbury Conservation Area.

It is my opinion that these properties are not suitable for commercial occupation for various reasons, including: the lack of a lift shaft/lift, the internal layout does not lend itself to modern office demand, it is over several floors and so is not practical nor user-friendly to the general public and is not DDA compliant; in short, it is not a commercially viable prospect to keep this unit as class B1. In addition to this, there is very little demand, if any at all, for office space within these five storey Georgian town houses. They cannot compete with purpose built, fully serviced office space that is now widely available locally. There are a number of current planning policies and Government guidance's that support the need for new housing, where possible utilising existing buildings/brown field sites. It is widely accepted that within London there is a surplus of Grade II office space, both Georgian and Victorian buildings that were originally designed as residential dwellings, with commercial use, are identified as suitable for residential conversion.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Jeremy W G James".

Jeremy W G James MA

Associate

jeremy.james@knightfrank.com

T +44 20 3435 6447

T +44 20 3435 6440 F +44 20 7486 0203
55 Baker Street London W1U 8EW

knightfrank.co.uk

Knight Frank LLP is a limited liability partnership registered in England with registered number OC305934.
Our registered office is 55 Baker Street London W1U 8AN where you may look at a list of members' names.

Morgan Lambert & Partners

12 John Street, London WC1N 2EB

▶ Telephone: +44(0) 207 405 1686 ◀

www.morganlambert.co.uk

e-mail: info@morganlambert.co.uk

Our Ref: PDM/10 J

M Cook Esq,
Danks Badnell Architects Ltd,
3/4 Osborne Terrace,
Windsor,
Berks SL4 3DE

28th October 2015

Dear Mr. Cook,

10 John Street, London WC1N 2EB

Morgan Lambert & Partners, as Estate Agents, have been involved in the Bloomsbury area of Central London for nearly 35 years, with particular reference to the properties comprising the listed former houses in John Street, Doughty Street and Great James Street. During this period we have occupied offices in the area ourselves and are considered a “niche” practise in this location. Over the years we have done work in one form or another, on many of the properties in the area.

As I am sure you have established, the majority of the properties in these streets were originally constructed as 5 storey houses between 200/275 years ago and during the early 1900's Solicitors working in the various Inns, started working from home, creating what we now know as “live-work” and gradually the work element expanded through the property.

It is now accepted that these buildings are not suitable for commercial occupation, for a variety of reasons. Firstly, they comprise rooms of various sizes, which are not ideal for commercial occupation and, more importantly because of the listed status, ingoing tenants are not able to alter the internal layout.

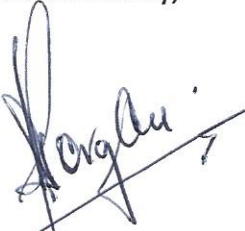
As these properties were constructed for residential use and in view of the listed status, they are not suitable for the modern amenities as required by commercial tenants, i.e. IT, raised floors, air conditioning/comfort cooling, lifts, etc. The lift aspect is the most important because as very few of these buildings actually have lifts and access to the buildings, from the street, is up some steps, these properties are not capable of ever being fully DDA compliant, which seems to be more important for occupiers and indeed regulations these days. As these properties are laid out mainly over 5 floors, (basement, ground & three upper floors) access between the floors is “walk up” which can cause staff problems, due to disabilities, age, health etc. with some tenants.

For this reason, more and more commercial tenants are now seeking more modern non-Listed single, “open plan” office floors where they can plan their own use, can partition accordingly and which would include the standard modern amenities. It is general knowledge that a more modern property is fundamentally more viable, is more business friendly and is also economically more suitable to tenants.

Cont/-

For the reasons given above and because demand for commercial occupation is all but non-existent, virtually all of the properties that have come to the market in recent years have reverted to their former residential use, which generally is C3 Family Housing, for which purpose they were originally designed and constructed.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Peter Morgan', written over a diagonal line that extends from the bottom left towards the right.

Peter Morgan

peter@morganlambert.co.uk

D/D Telephone: +44(0) 207 025 4721

Mobile: +44(0) 7836 558 960