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Contact: Sarah Freeman
Direct line: 020 7974 2437
Email: sarah.freeman@camden.gov.uk

Planning Solutions Team
Planning and Regeneration
Culture & Environment
Directorate
London Borough of Camden
2nd Floor
5 Pancras Square
London
N1C 4AG

www.camden.gov.uk/planning

Elena Weale
Fletcher Priest Architects
Middlesex House
34/42 Cleveland Street
London
W1T 4JE

Dear Elena

Pre-planning Application Advice: 53-54 Doughty Street, London, WC1N 2LS

Thank you for submitting a pre-planning application enquiry for the above property, which was received on 11 April 2017, together with the required fee of £1,218.

A site visit was undertaken on the 12 May 2017.

I hope you will find the below comments useful in determining your approach to the eventual application.

1. Site description

The pair of buildings that constitute the application site form part of a terrace of 23 houses (excluding no.48 which is listed separately), nos.29-47 and 49-62, listed as a group at Grade II. Opposite on the west side of the street is another terrace of 19 houses (nos.1-19) that are listed as a group at Grade II. Nos. 47-62 (including application site) were built c.1807-9, as part of the development of the Doughty estate in the south-east of Bloomsbury from c.1790.

Nos.53-54 are constructed of multi-coloured stock brick and comprise basement, ground and three upper floors. The properties have round-arched doorways with moulded jambs and lion-head stops, cornice-heads and patterned radial fanlights, three windows to each frontage with gauged brick flat arches to recessed 2 over 2 sash windows and stucco cornices and blocking courses. Railings to the front of the properties are included within the listing.

The 'Initial Heritage Appraisal' notes that no.53 was the home of Thomas Cubitt from 1837-49 and that by 1953 nos.53-54 were in the ownership of the Society of Lithographic Artists, when the two properties were linked through openings within the party wall. A single storey rear extension was added to the rear of no.54 in 1961.

The property is currently in office (Class B1) use.

The site is located within the Bloomsbury Conservation Area.

2. Proposal

Minor internal alterations to the ground floor area to create a new reception and waiting area space for Doughty Street Chambers. The proposals aim to enhance the overall staff and visitor provisions within the Chambers by creating new meeting rooms, break out space and a new seminar event space. The design aims to uncover and retain all original features and bring them back to life.

3. Drawings and documents received

- Pre-application report prepared by Fletcher Priest Architects, dated 22/05/2017
- Initial Heritage Appraisal prepared by Portice Heritage Ltd, dated May 2017

4. Relevant planning history

Application site – 53-54 Doughty Street

69277/3829 - (a) The use of the basement of No. 53, Doughty Street, St. Pancras, as a meeting room and the second floor as offices and (b) for the carrying out of alterations, including the erection of an extension at rear, at ground floor level, and the formation of a self-contained flat at third floor level at Nos. 53 and 54, Doughty Street, St. Pancras. **Granted 27/07/1954**

69277/15033 - Alterations to elevation at Nos. 53-54, Doughty Street, St. Pancras. **Granted 08/12/1954**

69277/18760 - The erection and retention of an extension to the ground floor at the rear of Nos. 53-54, Doughty Street, St. Pancras, for use as a meeting room, as shown on plan, Regd. No. 18760 (Your drawings Nos. 40 and 41), as a variation from plans previously approved, No. 3829 (Your drawing Nos. 15 and 16). **Granted 12/01/1955**

69277/314 - The erection of a single-storey extension at ground-floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room in connection with the existing use of the premises as the headquarters of the Society of Lithographic Artists. **Granted 05/06/1959**

69277/28977 - The erection of a single-storey extension at ground floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room

and interview rooms in connection with the existing use of the premises as the Headquarters of the Society of Lithographic Artists. **Granted 01/05/1961**

69277/12379 - The erection of a single-storey extension at ground floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room, and interview rooms in connection with the existing use of the premises as the Headquarters of the Society of Lithographic Artists. **Granted 20/10/1961**

69277/11970 - Alterations and extensions at third floor level at Nos. 53-54 Doughty Street, St. Pancras and for the use of the two front rooms on the third floor of No. 53 for office purposes and the two rear rooms on the third floor of No. 54 for residential purpose. **Granted 17/11/1960**

CTP6591 - The erection of an additional storey of office accommodation at first floor level, at the rear of Nos 53-54 Doughty Street, Camden. **Refused 22/05/1969**

CTP9549 - The erection of a small ground floor office extension at the rear of 53 & 54 Doughty Street, Camden. **Granted 09/12/1970**

8701922 - Erection of extensions at the rear of the second floor of No 53 and the second and third floors of No 54 as shown on drawings numbered 34DS/3 4 and 5. **Refused 24/09/1987**

8770267 - Restoration of existing buildings to include re-instatement of original glazing pattern cornices and fireplaces. Construction of new lift shaft to rear of buildings alterations and extension to existing closet wings to remove pipes etc and resite lavatories. **Decision Deferred Indefinitely 24/09/1987**

8770502 - Alterations to rear additions and minor internal alterations as shown on drawing numbers 3260/1 1864/P1A & 1864/P2 revised by letter dated 10th November 1987. **Granted 21/01/1988**

8703614 - Erection of extensions at the rear of ground, second and third floors and construction of a new roof over the existing ground floor rear extension for use as offices. **Granted 21/01/1988**

8970081 - Subdivision of rooms on second third floors and at basement level as shown on drawing numbered 101417/1 and letter dated 25th May 1989. **Granted 01/08/1989**

2007/0774/P & 2007/0775/L - External alterations in association with the refurbishment of the existing office building (Class B1) incorporating the installation of 2 air conditioning units in rear lightwell; replacement of existing plastic roof of the rear link structure and the insertion of new door and window at rear ground floor level; installation of timber panels to the entrance doors to replace unauthorised glass panels; and installation of 2 security cameras on front elevation. **Granted 31/08/2007**

2007/4533/L - Details of security cameras pursuant to condition 3 attached to listed building consent granted on 31/08/2007 (ref:2007/0775/L), for external alterations in association with the refurbishment of the existing office building (Class B1). **Granted 07/11/2007**

2007/5532/L - Details of pipe runs for air conditioning pursuant to condition 4 attached to Listed building consent granted on 31 August 2007 (ref: 2007/0775/L) for external alterations in association with the refurbishment of the existing office building (Class B1). **Granted 07/11/2007**

2007/6105/L - Details of internal pipe runs for the air conditioning units pursuant to condition 4 of listed building consent dated 31st August 2007 (ref. 2007/0775/L) (for external alterations in association with the refurbishment of the existing office building (Class B1)). **Granted 28/01/2008**

Relevant applications to nearby properties (determined since adoption of LDF policies in 2010)

2010/3185/L (40 Doughty Street) - Extensions at basement level, creation of a roof terrace at ground floor and third floor level and associated internal alterations to building. Granted 23/08/2010

2010/4974/L (46 Doughty Street) - Various external and internal alterations in association with conversion of flats (Class C3) and of Class A2 floorspace to a new dwelling house (Class C3), plus erection of rear extension at basement and ground floor level and rebuilding with increased height of the rear closet wing. **Granted 05/01/2011**

2013/2149/L (60 Doughty Street) - Alteration to the ground floor layout: relocation of the existing spine wall between the front and rear rooms. **Refused 10/06/2013**

2013/4163/L (50 Doughty Street), - Internal alterations at ground floor level, the formation of an opening between the front and rear rooms, and the re-instatement of a fireplace within the rear room, to dwelling house (Class C3). **Granted 06/08/2013**

5. Relevant policies & guidance

National Planning Policy Framework 2012

Chapter 7 Requiring good design (paragraphs 56-61, 66)

Chapter 12 Conserving and enhancing the historic environment (paragraphs 128-134, 138)

The London Plan March 2016

Policy 7.4 Local character

Policy 7.6 Architecture

Policy 7.8 Heritage assets and archaeology

LDF Core Strategy

CS14 Promoting high quality places and conserving our heritage

LDF Development Policies

DP24 Securing high quality design

DP25 Conserving Camden's heritage

Draft Camden Local Plan

D1 Design

D2 Heritage

Supplementary Planning Guidance

CPG1 Design (2015)

Bloomsbury Conservation Area Appraisal (2011)

6. Assessment

External alterations

The principle of installing new signage to the front elevation of the building is considered to be acceptable. Please note that care should be taken to ensure that all new signage is of an appropriate size and design, and any fixings required are to mortar joints not brickwork.

The proposed rationalising of external cabling, repainting of the existing railings and base is welcomed, as is the cleaning and restoration of the existing mosaic floor.

Minor internal alterations

The proposed removal of modern partition walls within the existing rear extension to nos.53-54 and the proposed installation of partition walls to subdivide spaces at basement level are considered to be acceptable and to not cause any harm to the special interest of the listed building. The aspiration to improve the access arrangements to the GF WC is supported.

The proposed stripping out of modern finishes, including modern suspended ceilings and the existing floor finish within the hallway to reveal the existing mosaic tile flooring, is welcomed. Further details within a schedule of works should be submitted within any forthcoming applications for listed building consent.

It is recommended that the installation of period appropriate fireplaces to the revealed chimneybreasts is considered.

Proposed new opening between front and rear rooms at ground floor level

The proposed double-door opening between the front and rear rooms within no.54 Doughty Street is not supported in principle. The curved spine wall, incorporating two original curved timber panelled doors, is considered to contribute considerably towards the building's overall significance. The proposals are considered to cause harm to the special interest of the listed building as a result of the loss of fabric and alterations to the character/plan form of the ground floor spaces. Notwithstanding these issues, the proposed configuration with a larger double door opening flanked by the two original curved doors is considered to be incongruous. The harm identified is not considered to be sufficiently outweighed by the heritage benefits identified through of minor improvement works identified within the pre-application documents submitted.

It is acknowledged that there are a number of listed properties in Doughty Street which have openings between front and rear rooms at ground floor level, however many of these represent historical changes that may have occurred prior to the listing of the terrace in 1972. However there is no uniformity to the interiors of buildings within Doughty Street and each case is judged on its own merits.

Nonetheless, in terms of more recent planning precedents (since the adoption of the Camden Local Development Framework policies in 2010) there have been some applications approved involving this form of alteration (see relevant planning history above). However there are not considered to be any direct precedents that relate to the particular circumstances regarding the proposed opening at nos.53-54. The approved proposals relating to nos 40 and 46 Doughty Street involved the enlargement of an opening between front and rear rooms at GF level, therefore the character of these spaces had already been altered and further minor alteration was considered acceptable. At no.50 a new opening was approved within a wall that had no existing openings, however the character of the space affected was more modest and did not involve any complications with existing doorways as at nos.53-54. It should be noted that at no. 60 Doughty Street, an application for the demolition and rebuilding of original early 19th century lath and plaster curved spine wall was refused due to the harm caused to the significance and architectural integrity of the listed building as a result of the loss of historic fabric and plan form.

It is recommended that alternative configurations are explored, potentially through using no.53 as the main reception area where an opening already exists, and considering improvements to wayfinding and signage.

7. Information required to support a full application

Notwithstanding the above advice, if you do decide to submit an application for listed building consent, the following plans and documents should be submitted to support the application:

- Completed application form – listed building consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Design and access statement
- Heritage Statement
- Floor plans at a minimum scale of 1:50 labelled 'existing' and 'proposed'
- Internal elevation drawings at a minimum scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a minimum scale of 1:50 labelled 'existing' and 'proposed'
- Detailed elevation and section drawings at a minimum scale of 1:20 showing the design and location of the proposed new signage to the front elevation and details of fixings to wall.
- Method Statement for the proposed internal and external restoration works

Please also see [Camden's Local Area Requirements](#) for more information on supporting information for planning applications.

We are required to consult the public regarding all external changes to Grade II listed buildings. The Council must allow 21 days from the consultation start date for responses to be received.

8. Conclusion

This is the Council's initial view of your proposals based on the information provided to us at this stage. It is recommended that revisions to the proposals, outlined in the above assessment, are made prior to the submission of an application for listed building consent.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers.

Please note that this document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries please do not hesitate to contact me directly.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Sarah Freeman
Conservation Officer
Planning Solutions Team