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Planning and Regeneration
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Date: 18/10/2017
Our ref: 2017/5090/PRE
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Robert Prewett
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By email

Dear Mr Prewett,

Re: 42 Doughty Street, WC1N 2LY

Thank you for submitting a pre-planning application enquiry for the above property which was received on 11/09/2017 together with the required fee of £609.00.

1. Drawings and documents

145 P 00, 145 P 01, 145 P 02, 145 P 10 (section AA) 145 P 10 (section BB), 145 P 13, 145 P 20, 145 S 100, 145 S 00, 145 S 01, 145 S 02, 145 S 10 (section AA) 145 S 10 (section BB), 145 S 13, 145 S 20, Heritage Statement and Impact Assessment, Design and Access Statement, Rear view 3Ds, 145 SK 09.

2. Proposal

Change of use from office (B1a) to residential (C3), erection of single storey rear extension, extension of existing basement floor to the rear and associated internal alterations.

3. Site description

The application site comprises a three storey property with basement and attic storey which is currently in use as offices. The application building is located on the eastern side of Doughty Street and is Grade II listed along with the rest of the Street. The surrounding area is predominantly used for residential and office purposes.

The application site is located within the Bloomsbury conservation area.

4. Relevant planning history

There is no planning or enforcement history for this property.

Building control records suggest an air conditioning system was installed in 2014 (application ref: 14/CP/02785). Planning permission and listed building consent were not sought for these works and they may therefore be liable for enforcement action as both are required for such an installation.

Neighbouring properties

No.52 - 2004/1512/P & 2004/3115/L - Change of use from office (Class B1) to single dwellinghouse (Class C3) with associated alterations. Granted 17/09/2004.

No.43 - 2005/0566/P - Change of use from residential and offices (Class C3/B1) to a single dwelling house (Class C3). Granted 06/05/2005.

No.56 - 2006/4199/P & 2006/5738/L - Change of use from existing office use (Class B1) to a single family dwelling house (Class C3). Granted 03/01/2007.

No.50 - 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. Granted 02/03/2007.

No.60 - 2007/3921/P & 2007/3931/L - Change of use from offices (Class B1) to a single family dwelling house (Class C3). Granted 14/12/2007.

No.57 - 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. Granted 08/05/2008.

2010/6940/P & 2010/6943/L - Renewal of planning permission granted on 8/5/2008 (Ref. 2008/0540/P) for (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). Granted 21/03/2011.

No.40 - 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. Granted 22/04/2009.

No.62 – 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. Granted 12/08/2010.

No.39 - 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). Granted 17/11/2010.

No.41 - 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).

No.60 - 2011/4542/P & 2011/4543/L - Change of use from offices (Class B1) to a single family dwelling house (Class C3). Granted 21/11/2011.

5. Relevant policies and guidance

[National Planning Policy Framework 2012](#)

[The London Plan March 2016](#)

[Camden Local Plan 2017](#)

G1 Deliver and location of growth
 H1 Maximising housing supply
 H6 Housing choice and mix
 H7 Large and small homes
 E2 Employment premises and sites
 A1 Managing the impact of development
 A4 Noise and vibration
 A5 Basements
 D1 Design
 D2 Heritage
 T1 Prioritising walking, cycling, and public transport
 T2 Parking and car-free development
 T4 Sustainable movement of goods and infrastructure
 DM1 Deliver and monitoring

[Camden Planning Guidance](#)

CPG1 (Design) 2015
 CPG2 (Housing) 2016
 CPG4 (Basements and Lightwells) 2015
 CPG5 (Town centres, retail and employment) 2013
 CPG6 (Amenity) 2011
 CPG7 (Transport) 2011

6. Assessment

The key planning issues are as follows:

- Land Use (loss of office floor space and creation of a single dwellinghouse)

- Design (the impact of the proposal on the special character of the host Grade II listed building, the setting of the wider terrace of listed buildings and the Bloomsbury Conservation area)
- Residential standards
- Amenity (impact on neighbouring amenity in terms of daylight, outlook, and privacy)
- Transport Considerations
- Basement excavation.

7. Land Use/Loss of office floor space

The proposal involves the loss of the entire office floorspace (B1a) to provide a 5 bedroom dwellinghouse, within the Central London Activity Zone (CAZ). The principle of this change of use was discussed as part of the previous pre-application advice report, but is reproduced below for information.

In terms of the loss of the existing office space, policy E2 states that sites that are suitable for continued business use, in particular, premises for small business, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy will be protected. The council will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- 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.

A market research report by Farebrother was submitted with the previous pre-application documents along with a cost plan for the upgrade of the existing office space.

These documents indicate that due to the existing state of the premises, the significant amount of refurbishment that would be required to bring the offices up to modern requirements, and the constraints on internal alterations due to the building's heritage significance, this redevelopment would not be financially viable. Furthermore, by converting the building back to its original intended use, many original features would be restored, and the harmful modern interventions linked to the office conversion would be removed.

Despite this, full marketing evidence would still be required at application stage along with a thorough assessment against Policy E2. Provided the lack of demand is adequately demonstrated and justified, the loss of office space is likely to be considered acceptable.

With regards to the replacement land use, housing is regarded as the priority land-use of the Local Plan and the Council will make housing its top priority when considering the future of unused and underused land and buildings. As such, the creation of a new residential dwelling is compliant with policy H1 as long as it meets the Council's and national residential development standards and does not harm local amenity.

Policy H7 seeks to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table. The table identifies 2 bedroom and 3 bedroom market dwellings as the highest priority, whilst 1 bedroom and 4+ bedroom units are lower priority. Nevertheless, the Council acknowledges that there is a need and/ or demand for dwellings of every size and would expect most developments to include some homes that have been given a medium or lower priority level.

Furthermore, policy H3 of the Local Plan 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 (within which the application site is located) is listed as such a ward.

The loss of employment space and the creation of a larger single dwellinghouse is therefore likely to be considered acceptable, subject to the relevant policy compliant justification, in land use terms.

8. Design and Heritage

Overall the revised design and heritage approach is welcomed. The proposals largely work with the existing building's plan form and seek to retain architecturally and historically significant features and detailing, including the retention of some of the better examples of the Edwardian additions. The whole house approach to sensitive upgrading of original fabric where possible is supported.

The proposed servicing strategy was briefly discussed during the meeting with Sarah Freeman on 18/09/2017 where it was indicated that the intention is to utilise an existing A/C void within the centre of the building to run SVPs for new bathrooms and that there is a desire to rationalise pipework to the rear of the building. Consideration should be given towards retaining any significant Victorian cast iron downpipes. It is recommended that the issue of new services is addressed at application stage rather than being left to conditions. Therefore you are asked to include as much information on this at application stage as you can to ensure that these details are able to be fully considered.

Front elevation

The proposed removal of the Edwardian plate glass windows and reinstatement of 6/6 sash windows to the front elevation and the replacement of the modern fanlight is supported in principle. It is understood that the sash boxes are also not original, and therefore the principle of their replacement is supported. Full details of the replacement sash windows should be included in support of any full application.

Further information regarding the condition of the brickwork and justification to support the proposed repointing of the front elevation should also be submitted with any future application.

Rear extension

The design of the proposed rear extension has been reconsidered from the initial pre-application proposals, significantly reducing its overall depth and retaining a much larger area

of garden, which is generally supported. It is appreciated that the reduced depth of the proposed extension allows for a more comfortable relationship with the garden of the neighbouring property and alleviate potential amenity issues. The overall aim to present a clear articulation between the original building and later additions is welcomed.

The proposed demolition of the late 19th century closet wing is considered to be justifiable due to its overall low level of significance, and the principle of its replacement with a modern extension could be supported. The demolition of the top storey of the existing closet wing between the 1st/2nd floor levels and reinstatement of a sash window demonstrates clear heritage benefits and is strongly supported.

However, it is considered that the design concept underlying the different elements of the proposed rear extension needs further resolution. The current design reads as a replacement two storey closet wing with a lightweight single storey element wrapping around at ground floor, although not full width.

It is understood that pulling away slightly from the boundary wall has been developed as a response to improving the relationship with the neighbouring garden, which is supported. This has the added effect of allowing the form of the two storey element to run to the ground in the manner of a traditional closet wing. However, in the meeting of 18/09/2017 it was advised that the intention was for the two elements to read as a harmonious addition and to relate clearly to one another.

It is recommended that the design is developed and revised so that the replaced two storey element should read as a contemporary interpretation of a closet wing with its solid walls contrasting with the more lightweight proposed 'infill' at ground floor level. The revised sketch submitted via email on 21/09/2017 indicates that a glazed corner to the single storey element is proposed, which is supported. This sketch also shows the rear elevation of the two storey extension should run straight down to the ground level (as opposed to the previous sketch that shows an upstand to section set away from boundary wall), which is a preferred option in this instance.

It has been suggested that the solid external walls of the two storey element could be finished in brick to reflect this, with more lightweight materials used for the ground floor element. It is understood that the proposed construction method may not allow for the weight of brick, and that a dark stained timber cladding is currently being considered. There are concerns about the use of timber cladding in this context, and it is strongly recommended that alternative materials are considered - perhaps metal cladding. In your email of 21 September 2017 you mention that you are considering the use of mathematical tiles or brick slips as a cladding material for the two storey element. These are likely to be considered appropriate, provided that the brick slips and bonding match the original brickwork.

Some concerns have been raised by officers regarding potential lightspill from the proposed rooflights, particularly to the roof of the proposed two storey extension. It is recommended that this issue is considered when developing the final proposals and that measures such as one way glazing that allows light in but not out is considered or obscured glazing.

Another key design consideration is the articulation and contrast between the original rear elevation and the extended elements. As a result of the revised design approach to the extension, it is now proposed to fully enclose the lightwell shown on the initial pre-application proposals. Concerns were previously raised regarding the potential for the reduction in natural light provision as a result of extending to the rear. Consideration has been clearly given to this issue within the new design through the provision of various rooflights, which is welcomed.

Consideration has also been given towards maintaining the distinction between the original rear elevation and the new extension, through the retention and adaptation of the sash window to the rear at ground floor level, with a large rooflight above and the retention of exposed brickwork internally and the retention of the layout of the lightwell at basement level, all of which are welcomed. It is recommended that further consideration is given to maintaining a sense of the basement lightwell at ground floor level through the use of walk-on glazing / other transparent materials.

The principle of the installation of a new stair within the existing basement lightwell is generally supported, although further information would be welcomed regarding any impacts on the vaulted wine cellar below and the design and materials proposed.

The idea of creating a jib door to access the new extension, retaining and adapting the sash window, is something that is likely to be supported in principle subject to further detail, which should be submitted in support of any application.

Roof Dormer Extension

This element of the proposal has been developed as a way of providing access into both loft spaces without the need for cutting new access hatches into original lath and plaster ceiling. This proposal appears to be an innovative solution and is likely to be considered acceptable subject to further information regarding the impacts on the roof timbers and the amount of intervention required. Please confirm that the ceiling below would not be removed as part of the future planning application? It is also recommended that you investigate salvaging and re-using the existing roof covering.

Other Proposed Internal Alterations

Basement:

- There is no objection to provision of an en-suite bathroom within the front room. Compared to ground / first floor levels this floor has an overall lower level of significance and can accommodate some further alteration.
- The proposed retention and re-use of the existing wine vault and safe is welcomed. There is no objection to the principle of the proposed additional excavation within the garden from a heritage perspective. Please refer to section 12 for further assessment of the basement works.

Ground floor

- The principle of creating a new opening between the original front and rear rooms is not supported due to the impact on the plan form and character and resultant loss of historic fabric. Therefore this element should not be included within future applications.

Second Floor

- There are some concerns regarding the proposed partition within the front room. It is understood that there is some evidence that this room may have been subdivided in the past (perhaps originally) though markings in the floorboards, albeit not in the location of the proposed new partition.
- The current arrangement of a new partition wall dividing the spaces is not supported due to the awkward relationship of the partition wall with the chimneybreast / fireplace. It is recommended that either a partition wall along the lines of the former partition is considered, or alternatively a joinery feature is designed within the roof, but not full height, could allow for built in storage that retains the proportions and character of the room.

Third Floor

- The proposed retention of the original panelled partition wall between the front rooms is welcomed.

9. Residential Standards

The proposed use would comprise a 5-bedroom (10 Person) single residential dwellinghouse and would provide approximately 360sqm gross internal floor space.

The Council expects development to provide high quality housing that provides secure, well-lit accommodation with well-designed layouts and rooms in accordance with guidance provided by CPG2 (Housing). The DCLG's [Nationally Described Space Standards](#) sets out new space standards which all new dwellings, including conversions of existing residential units, must meet. The floor area requirements does not extend to a 10 person dwelling; however, the proposal would substantially exceed the minimum overall floor area requirement for a 6 bedroom/8 person 3 storey dwelling of 138sqm. The development would provide dual-aspect accommodation which would ensure it received good levels of daylight and natural ventilation. The property already benefits from outside amenity space, 50% of which is proposed to be retained.

10. Amenity

Policy A1 seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight.

The revised proposals have significantly reduced the size of the proposed extension, which is welcomed. This would ensure an adequate sized garden is retained whilst limiting the impact on neighbouring properties. At ground floor level, the extension would measure 5.7m deep along the boundary with no.43, which would be a 50cm increase on the existing situation.

Likewise, at first floor level the extension would be a similar footprint as existing, which would ensure that any impacts on daylight and outlook at no.43 would be limited when compared to the current arrangement. However, the proposed rooflight above the two storey element raises concerns due to its size and proximity to the first floor window at no.43. As discussed above, it is recommended that measures to prevent lightspill to this property are investigated.

Although the ground floor extension would be full width and built up to the boundary wall with no.41, it would only extend marginally higher than the existing wall which would ensure the daylight and outlook of no.41 was preserved. Although a large rooflight is introduced at the join between the new extension and original rear elevation, this would not cause disturbance to no.41 due to its position next to the neighbouring blank flank wall. It is recommended that the second, smaller rooflight is treated similarly to that at first floor level to prevent any lightspill which could potentially disturb no.41.

Aside from the two rooflights discussed, the proposed extension in its current form, is not considered to unduly harm neighbouring amenity in terms of outlook, privacy or daylight.

11. Transport

Car Parking

Policy T2 seeks to promote sustainable travel and make private transport more sustainable by requiring all new developments in the borough to be car-free.

As the proposals involve the creation of a new residential unit, the development would be required to be car-free in line with Policy T2. This would be secured via Section 106 legal agreement.

Cycle Parking

Policy T1 requires a development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards. We also expect the development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan.

Table 6.3 in the London Plan lists the minimum number of cycle parking spaces required for C3 residential use and states that 2 long stay spaces are required for each dwelling with 2 or more bedrooms. In order to comply with policy the development would be required to provide 2 cycle parking spaces.

When you submit a formal planning application, all detailed dimensions of the cycle parking facilities must be provided as part of the planning application. The cycle parking facilities and access arrangements would need to comply with the guidance provided within [CPG7](#).

12. Basement impact

The proposals involve the extension of the existing basement floor into the rear garden by an additional 11sqm to a depth of approximately 2.1m below ground level.

Policy A5 of the Local Plan states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of heritage assets.

The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- a) not comprise of more than one storey;
- b) not be built under an existing basement;
- c) not exceed 50% of each garden within the property;
- d) be less than 1.5 times the footprint of the host building in area;
- e) extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- f) not extend into or underneath the garden further than 50% of the depth of the garden;
- g) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- h) avoid the loss of garden space or trees of townscape or amenity value.

The Council will require applicants to demonstrate that proposals for basements:

- a) maintain the structural stability of the building and neighbouring properties;
- b) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) do not harm the structural stability of the host building, neighbouring buildings or the water environment in the local area;
- d) avoid cumulative impacts;
- e) do not harm the amenity of neighbours;
- f) provide satisfactory landscaping, including adequate soil depth;
- g) do not harm the appearance or setting of the property or the established character of the surrounding area;
- h) protect important archaeological remains; and
- i) do not prejudice the ability of the garden to support trees where they are part of the character of the area.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

The application site is located in an area subject to underground development constraints due to slope stability and subterranean (groundwater) flow. Given this, and the heritage significance of the host listed building, you are advised to thoroughly examine the requirements of Policy A4 of the Local Plan and CPG4 prior to submission. The site is also located in an area with potential contamination and this should also be addressed.

The development would require a comprehensive and accurate Basement Impact Assessment to be submitted with the formal application demonstrating no significant harm to the application site, neighbouring sites or those surrounding.

The BIA will need to include at least the screening and scoping stages, to determine whether a full BIA would be required. This would comprise the following:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

At each stage in the process the person(s) undertaking the BIA process should hold qualifications relevant to the matters being considered. The Council will only accept the qualifications set out in paragraph 2.11 of CPG4.

Independent verification of Basement Impact Assessments, funded by the applicant, is now also required (since CPG4 was updated in September 2013) in the following situations:

- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment);
- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).
- A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern.

Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in [appendix A](#) of Camden's BIA audit service terms of reference.

13. Conclusion

In terms of land use, residential standards and impact on neighbouring residents, the proposals are likely to be considered acceptable at full application stage provided the comments regarding the proposed rooflights and detailed design are taken into account. The majority of the proposals are considered acceptable in terms of the impact on the special character of the host listed building; however, the proposals to insert a new opening at ground floor level and a new partitioning wall at second floor level (as currently proposed) cannot be supported.

14. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full planning permission and listed building consent.
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Justification of loss of office floor space including marketing evidence
- Heritage Statement
- Sample photographs/manufacturer details of materials.
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.
- Additional details of:
 - New services.
 - Further information regarding the condition of the brickwork and justification to support the proposed repointing of the front elevation.
 - Further information on the proposed stair within the existing basement lightwell (including the design and materials proposed) and any impacts on the vaulted wine cellar below.
 - Further details of jib door to access the new extension

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and must allow 21 days from the consultation start date for responses to be received.

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. For more details click [here](#).

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 about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Planning Officer

Planning Solutions Team