

62 Doughty Street

Planning Statement

The Bill Thomas Settlement

August 2020

LICHTFIELDS

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Appendix 1 – Heritage Statement

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of the applicant, The Bill Thomas Settlement, to accompany a planning application for a temporary subdivision and change of use of 62 Doughty Street.

1.2 The proposed development comprises the following:

A temporary subdivision and change of use of 62 Doughty Street from the established C3 use to mixed B1 commercial floorspace with ancillary short-stay business visitor accommodation and a single self-contained residential unit at lower ground floor level.

1.3 The building at 62 Doughty Street is a large Grade II listed property located on the eastern edge of Bloomsbury. The property originally dated from the early nineteenth century, but it was rebuilt as a facsimile in the 1970s.

1.4 Due to the property being a facsimile, it should be noted that there is nothing of heritage value internally. The 1970s building's listing is a function of its group value as part of the wider terrace.

1.5 The site is currently vacant and has had a history of successive commercial and residential uses. Further detail of the planning history is provided in Section 3 below.

1.6 The application follows constructive pre-application discussions with Officers from Camden on 15 July 2020 during which the principles of the development were supported.

1.7 The purpose of this Planning Statement is to bring together the necessary information to assess the proposal against prevailing planning policy and having regard to material considerations.

Scope of the Application

1.8 Alongside this Planning Statement, the planning application is accompanied by the following documents:

- 1 Architectural plans;
- 2 Heritage Statement (Appendix 1);
- 3 Site Photographs;

1.9 The scope of the application has been agreed with LBC officers prior to the submission of the application.

Structure

1.10 The structure of this report is as follows.

- **Section 2.0** briefly describes the site and its context and summarises the background to this proposal.
- **Section 3.0** sets out the planning and project history.
- **Section 4.0** provides a description of the proposed development.
- **Section 5.0** identifies the planning policy context and key tests relevant to the determination of the planning application.
- **Section 6.0** contains a comprehensive assessment of the proposed development in planning terms; and

- **Section 7.0** sets out the conclusions.

2.0 **Site and Surroundings**

The Site

- 2.1 The site is located north of Holborn on the corner of Doughty Street and Roger Street. The property contains six bedrooms and is a five-storey (including lower ground floor) terraced house with a Grade II listing, falling within the Bloomsbury Conservation area.
- 2.2 In 1993 the property was acquired by the Fulbright Commission who used it for their London Office. The Bill Thomas Settlement obtained the property in 2009 and proceeded to secure planning permission for a change to a large single residential dwelling. The site is currently vacant.
- 2.3 The site and surrounding area is located in the Central London section of Camden as well as London's Central Activity Zone (CAZ). A large part of London's CAZ falls within Camden. This is an area where residential areas sit alongside the major commercial elements. It contains a significant proportion of the borough's office floorspace, a variety of shopping areas, from neighbourhood centres to specialist retail locations like Covent Garden, and is home to many other uses.
- 2.4 The site is highly sustainable, located approximately 700m from Russel Square Station and 900m from Chancery Lane Underground Station resulting in a PTAL score of 6b which is the highest possible rating.

The Surroundings

- 2.5 Doughty Street comprises a mixture of three and four-storey terraces with basements and mansard roofs. All of the buildings within the street are grade II listed, with the exception of Dickens' House Museum at No 48 which is Grade I listed.
- 2.6 Doughty Street and the surrounding area were first built as residential dwellings which were then converted for commercial purposes. Throughout the area there has been a trend towards converting the townhouses in office use back into large single-family residential dwellings. This has been the case on Doughty Street, including at No. 62.
- 2.7 The area surrounding 62 Doughty Street contains many restaurants, bars and shops with some being as close as 50m from the property, such as the Duke and Woolleys. Russel Square which contains green space is located approximately 800m from the site.

Figure 2.1 Site Location



Figure 2.2 Site Photograph



Source: Dexters

3.0 **Planning and Project History**

Planning History and Site Background

- 3.1 Doughty Street and the surrounding area were first built as residential dwellings, which were subsequently converted for commercial purposes. As referred to above, throughout the area there has been a trend towards converting the townhouses in office use back into single family residential use, as is the case on Doughty Street, including at No. 21.
- 3.2 In 1993 the property was acquired by the Fulbright Commission who used it for their London Office. The Bill Thomas Settlement obtained the property in 2009 and proceeded to secure planning permission for a change to residential use which has been implemented
- 3.3 The property at 62 Doughty Street has the following planning history:
- 2010/0189/L - Change of use of a grade II listed building from offices (class B1) to a single dwelling house (class C3). Alterations to include the removal of ground floor rear extension, new staircase to basement, and installation of new front door and doors to rear elevation at basement level – Approved 23.03.10.
 - 9370018 - Minor internal alterations and new external signage to front of building as shown on drawings – Approved 1993.
- 3.4 The change of use application approved a change from office use (Class B1) to a single 6-7 bedroom residential unit (class C3). The property was used for residential purposes following this application, however the property is currently vacant. The last tenants of property vacated on the 6th March 2020.

Project History

- 3.5 In accordance with the National Planning Policy Framework, the proposed development has been subject to early engagement with the Council.

Pre-Application Meeting (July 2020)

- 3.6 The pre-application meeting was held on 15th July 2020 where the scheme was presented to officers for comments.
- 3.7 Formal written feedback was received on the 14th August 2020. The feedback provided by officers was supportive of a temporary subdivision and change of use of 62 Doughty Street from the established C3 use to mixed B1 commercial floorspace with ancillary short-stay business visitor accommodation and a single self-contained residential unit at lower ground floor level.
- 3.8 A summary of the key points received from LBC include:
- The principle of development in terms of the temporary change of use was deemed acceptable. This is supported by the Camden Local Plan Policies.
 - Given the historic uses of the building and the character and context of adjacent buildings and uses, the proposed mixed residential and commercial use is considered appropriate in this location.
 - It was confirmed that the works would be internal only and the physical interventions would be minimal, temporary in nature and confined to the lower ground floor and third floor.
 - It was discussed that the building is a facsimile, rebuilt in 1974 and therefore the internal building fabric is not of significant heritage value and this would be documented in any future planning application.

- As there are no external works, there will be no impact on the setting of the conservation area or the value of the group listing.
- It was requested that a full planning application and listed building consent application would need to be submitted and the scope of detail for the applications was provided.

Summary

- 3.9 The resultant scheme for the site at 62 Doughty Street comprises a well-conceived and supportable proposition in planning terms will contribute to Camden’s housing and economic policy objectives and will not have negative heritage impacts.

4.0 **Proposals**

Land Use

- 4.1 The proposals seek to temporarily reintroduce B1a commercial accommodation at the property between ground and second floor level while retaining an element of residential accommodation on site at lower ground floor level. This would comprise approximately 480 sqm of employment floorspace.
- 4.2 A known end user, Akeneo, is lined up to occupy the proposed temporary office floorspace on the basis of a three-year contract, following which the property is expected to revert to residential use.
- 4.3 Akeneo are intending to lease the property for its London headquarters, should the proposals be delivered. Akeneo is a global leader in Product Experience Management solutions that help merchants and brands deliver consistent and enriched customer experiences. The space would be used for up to 20 employees.
- 4.4 The B1a floorspace would be provided at ground to second floor level, with ancillary business visitor accommodation on the third floor. The third-floor ancillary business visitor accommodation would share access and circulation via the main staircase with the B1a floorspace and would therefore remain ancillary to the business use.
- 4.5 The lower ground floor level, would operate entirely independently owing to its separate entrance and would therefore form a single residential planning unit, retaining a C3 use on site for the duration of the temporary change of use. It is intended that the self-contained lower ground floor accommodation would also be used by business visitors associated with the intended occupiers of the temporary commercial floorspace above.
- 4.6 The proposal therefore requires the subdivision of the property to deliver a B1a Office Unit, ancillary business visitor accommodation and a self-contained residential unit on the lower ground floor level for a temporary basis. It is intended to revert to a single-family dwelling in the long term.

Internal Alterations

- 4.7 The works required to accommodate the proposed temporary change of use would be internal only and confined to the lower ground, with the physical interventions being minimal and temporary in nature.
- 4.8 The proposal includes the internal reconfiguration of the Lower Ground Floor to provide a 2 Bedroom flat, with a kitchenette and living room. Also proposed, is the provision for two glazed escape doors for the 2 bedrooms facing out onto the garden terrace access-way. the size of the lower ground floor flat is 72 sqm which therefore meets Nationally Described Space Standards for 2 bed single story dwelling.
- 4.9 No work is proposed elsewhere in the building. There is no decorative plasterwork in the building and no changes to joinery are envisaged.
- 4.10 As the property is a facsimile, rebuilt in 1974, the internal building fabric is entirely non original and therefore no historic fabric would be harmed. The photos submitted in support of this application provides evidence as such and confirms that the interior is of no heritage value.

Servicing and Parking

- 4.11 In terms of refuse collection and servicing, the proposal would follow the current refuse collection system in place.
- 4.12 The domestic waste will be collected by the existing waste collection which operates on Doughty Street every Monday, Wednesday and Friday. The collection of the commercial waste on Doughty street operates between 7am-2pm daily.
- 4.13 The site is located on the corner of Doughty Street and Roger Street within the Clear Zone Region. There is no vehicular access to the site and none is proposed given the excellent access to public transport in the vicinity (Public Transport Accessibility Level of 6b, on a scale of 1 to 6b within 6b being excellent).

5.0 **Planning Policy**

- 5.1 This section identifies the planning policy and guidance at national and local level relevant to this proposal. It then identifies key planning considerations against which the planning application will be determined.

National Planning Policy Framework (2019)

- 5.2 The National Planning Policy Framework (NPPF, 2019) sets out the Government’s planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development
- 5.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: ‘economic’ to help build a strong and competitive economy; ‘social’ to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and ‘environmental’ in protecting and enhancing the environment.
- 5.4 Paragraph 11 of the NPPF requires LPAs to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states:

“For decision-taking this means:

approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole....”

- 5.5 Paragraph 121 notes that Local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.
- 5.6 The effect of development on heritage assets is considered in Chapter 16 of the NPPF. Local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (paragraph 192).
- 5.7 Chapter 9 of the NPPF promotes sustainable transport. In paragraph 103, it is stated that ‘significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes’.

Statutory Development Plan

- 5.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.9 The Statutory Development Plan for this site comprises:

- 1 The London Plan (March 2016);
 - 2 The Camden Local Plan adopted (2017),
 - 3 Camden Policies Map (2019),
 - 4 Site Allocations Plan 2013
- 5.10 Within the Development Plan, the site falls with the Bloomsbury Conservation area and the Central Activity Zone.

The London Plan (2016)

- 5.11 The London Plan comprises the strategic component of the development plan and provides London wide policy and guidance. It is expected that this will be replaced by the New London Plan this year. It promotes a sustainable and compact model of development which utilises accessible brownfield urban land efficiently, creates jobs and maximises housing outputs.
- 5.12 This Plan seeks to maximise the economic, social and environmental benefits from such investment in London. For the London economy, these benefits include economic output, employment, productivity, business opportunities, regeneration and the capital's contribution to the wider UK economy.
- 5.13 Inner London is recognised in Policy 2.9 which states how the Mayor and boroughs and other stakeholders should, work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.
- 5.14 Policy 4.1 sets out how the Mayor will work with partners to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors.
- 5.15 Policy 4.2 sets out that mixed use development and redevelopment of office provision to improve London's competitiveness and to address wider objectives, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises is supported.
- 5.16 The London Plan notes that in the CAZ there remains strong long term office demand, and a substantial development pipeline which is partly subject to the implementation.
- 5.17 Policy 7.8 discusses London's heritage assets. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Camden Local Plan (2017)

- 5.18 The Local Plan seeks to meet Camden's needs from 2017- 2031 by providing 16,800 additional homes and 695,000sqm of office floorspace.
- 5.19 A summary of the relevant LBC policy to this application can be found below.

- **Policy G1:** The Delivery of Growth – LBC will expect the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible and supporting a mix of uses either on site.
- **Policy H3:** Protecting existing homes - The Council will resist development that would involve a net loss of residential floorspace. This policy seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs)
- **Policy E1:** Economic Development – LBC will support businesses of all sizes, in particular start-ups, small and medium-sized enterprises. It is noted that premises suitable for small and medium businesses are currently under pressure from rising land values, limited land availability and ‘permitted development’ rights which allow the change of use from offices (B1(a)) to housing (C3) without the need for planning permission.
- **Policy D2:** Heritage - The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings. LBC will also resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.

Emerging Planning Policy

New London Plan

- 5.20 The Mayor of London is in the process of adopting a New London Plan (NLP). The Mayor published an ‘Intend to Publish’ version of the London Plan on 9 December 2019 which was sent to the Secretary of State alongside a schedule of the Panel’s recommendations and the Mayor’s response to them.
- 5.21 The Housing Secretary, Rt Hon Robert Jenrick MP, issued his letter to the Mayor of London on his ‘Intend to Publish’ London Plan in March 2020. The letter sets out eleven directions and ‘remedies’, which must be incorporated into the plan before it can be published.
- 5.22 Policy E1 supports new office provision, refurbishment and mixed-use development to deliver improvements to the quality, flexibility and adaptability of different sized office space for enterprises of varying size. Town centre locations are also identified as key locations for office development.
- 5.23 Policy GG2 promotes higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services, applying a design-led approach. Policy D1B also seeks to optimise density (with consideration being given to site context, connectivity and accessibility, and the capacity of surrounding infrastructure).
- 5.24 Policy D6 also confirms development proposals must make the most efficient use of land and be designed at the optimum density. Proposals that do not demonstrably optimise the housing density of a site should be refused and greater scrutiny of design is required the greater the level of density. The policy also discourages an overly mechanistic approach to density based on the matrix.
- 5.25 Policy T1 applies a strategic approach to transport. The Mayor is encouraging 80% of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated. Policy T2 supports development

proposals that will reduce the dominance of vehicles of London's Streets and that they are permeable by foot and cycle opportunities as well as public transport.

Other Material Considerations

5.26 In addition to the Statutory Development Plan and emerging draft policy, the following documents are considered relevant and material in determining its application:

5.27 National Planning Policy

- National Planning Policy Framework
- Planning Practice Guidance ('PPG') (CLG; 2014, 2017, 2018 and 2019); and

5.28 Local Guidance (LBS)

- Camden Housing Guidance (2019)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

6.0 **Assessment of the Proposed Development**

6.1 This section provides an assessment of the proposed development having regard to the Development Plan policies outlined above. From analysis of the statutory development plan, national policy and the statutory tests it is considered that the following planning considerations represent the key policy issues against which the planning application should be considered:

- Principle of development
- Temporary replacement of residential floorspace
- Heritage impacts
- Access and servicing

Principle of Development

- 6.2 The proposed development will comprise of a temporary change of use from the established C3 use to introduce B1 Office Space on the ground and first floor of the property. This temporary change of use will assist in meeting the employment targets and provide economic benefits for LBC. It is anticipated that this change of use will provide 20 full time jobs. The building will return to residential use following its temporary use as office space.
- 6.3 The site has been vacant since March 2020 as the previous tenants have vacated the property. Paragraph 121 of the NPPF (2019) notes that Local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. The site is not allocated for a particular use in Camden Planning Policies.
- 6.4 Policy E1 of the emerging London Plan supports new office provision, refurbishment and mixed-use development to deliver improvements to the quality, flexibility and adaptability of different sized office space for enterprises of varying size.
- 6.5 The Camden Local Plan (2017) policies guide development in the borough until 2031. The site is located in the area of Holborn, one of the areas where the Local Plan expects growth to be delivered (Policy G1). Policy G1 states that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden. This policy also notes that the Council will support a mix of uses on site.
- 6.6 The Local Plan seeks to meet Camden’s needs from 2017- 2031 by providing 695,000sqm of office floorspace. Policy E1 states that the Council will support businesses of all sizes, in particular start-ups, small and medium-sized enterprises. It is noted that premises suitable for small and medium businesses are currently under pressure from rising land values, limited land availability and ‘permitted development’ rights which allow the change of use from offices (B1(a)) to housing (C3) without the need for planning permission.
- 6.7 The Camden Housing Guidance (2019) notes that the Council when assessing proposals, will take into account other material considerations and particularly the history of the building since June 2006, including previous developments.
- 6.8 The temporary change of use to reintroduce the commercial element to the property is therefore in line with the local Policy E1. The proposal will provide workspace for a small business, bringing activation to this currently vacant site.
- 6.9 The applicant is currently in advanced discussions with a potential occupier for use as their London headquarters, the business requirements of which have informed these proposals. The

space would be used for up to 20 employees, therefore, the change of use would deliver a significant uplift in employment growth and the subsequent, associated economic benefits.

- 6.10 The temporary nature of the change of use would, however, safeguard the property’s residential use in the long term. This is considered to be an appropriate balance between the local economic and employment benefits provided by the prospective occupants of the building, in place of the current vacant floorspace, and the concurrent need to protect housing stock.
- 6.11 On this basis, officers from LBC have confirmed through pre-application discussions that the principle of the temporary change of use is supported in land use terms.
- 6.12 It is therefore considered that the principle of a temporary commercial use on this site is consistent with the NPPF, the development plan and pre-application guidance from officers.

Temporary replacement of residential floorspace

- 6.13 Paragraph 117 of the NPPF (2019) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. They should also promote and support the development of under-utilised land and buildings.
- 6.14 The current lawful use of the property is C3 residential however, the property is currently vacant with no residential occupants.
- 6.15 Policy H3 of the Camden Local Plan states that the Council will resist development that would involve a net loss of residential floorspace. This policy seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs).
- 6.16 The proposal would involve a temporary change to use to reintroduce a commercial element to the property to enable its occupation by the prospective commercial tenant. It should be noted that the property is currently vacant with no residential occupants and is likely to remain so in light of the very limited market demand and housing need for a single residential property of this size and nature. The property is not therefore currently contributing meaningfully towards Camden’s housing need or economic growth.
- 6.17 The temporary loss of (vacant) residential floorspace is offset and outweighed by the benefits of introducing an employment generating use to the property, alongside a smaller self-contained residential unit (2bed) at lower ground floor (which is more suited to local market demand) and with the long term commitment to return the property to C3 residential use in its entirety.
- 6.18 A time limited application would therefore allow 62 Doughty street to be temporarily used and occupied partly for B1 workspace until the permission ceases at which point the building would revert back to the current C3 residential use.
- 6.19 We consider the economic benefit that will be brought by the reintroduction of office space coupled with the long term reversion to C3 residential use, to outweigh the temporary loss of a proportion of existing residential floor space at the property. In addition, the retention of a self-contained residential use at basement level would continue to contribute to Camden’s Housing Need.

Heritage

- 6.20 As described above, 62 Doughty Street is a large Grade II listed property located on the eastern edge of Bloomsbury in the London Borough of Camden (LBC). The property is within the Bloomsbury Conservation area.

- 6.21 Chapter 16 of the NPPF requires that, in determining planning applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).
- 6.22 London Plan (2016) Policy 7.8 states that London’s heritage assets including listed buildings, should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- 6.23 Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings. LBC will also resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.
- 6.24 The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted by LBC in 2011 and defines the special interest of the Conservation Area in order that its key attributes are understood and can be protected.
- 6.25 The Bloomsbury Conservation Area is located within central London, its southern boundary around 750 metres north of the River Thames. It covers an area of approximately 160 hectares which extends from Lincoln’s Inn Fields and High Holborn to Euston Road and from King’s Cross Road to Tottenham Court Road.
- 6.26 The Bloomsbury Conservation Area Appraisal discusses Doughty Street and surrounding area which has a clear street hierarchy structured on a grid layout and notes that the historic built form comprises townhouses built in long terraces with rear mews.
- 6.27 It is stated that the townhouses, dating from the 18th and 19th centuries, are either of three or four storeys raised on basements fronted by cast-iron railings and the fine grain remains an important characteristic and the continuous building frontage created by the terraces creates a strong sense of enclosure.
- 6.28 However, it should be taken into consideration that while the property originally dated from the early nineteenth century, it was rebuilt as a facsimile in the 1974. 62 Doughty Street is therefore not of significant heritage importance and it is listed by grouping with the other properties on Doughty Street.
- 6.29 The works proposed are only internal and the physical interventions would be minimal, temporary in nature and confined to the lower ground floor. In light of its reconstruction as a facsimile, the interior of the building is not of any heritage value or significance and therefore the temporary interventions would not cause any harm in heritage terms. Furthermore, as there are no proposed works to the external building fabric the proposals would not have any impact on the significance of the listed building or the setting of the conservation area. This has been confirmed through pre-applications discussions with LBC officers.

Access and servicing

- 6.30 The site is located on the corner of Doughty Street and Roger Street within the Clear Zone Region. There is no vehicular access to the site and none is proposed given the excellent access to public transport in the vicinity. The site has a PTAL of 6b.
- 6.31 The domestic waste will be collected by the existing waste collection which operates on Doughty Street every Monday, Wednesday and Friday. The collection of the commercial waste on Doughty street operates between 7am-2pm daily.

7.0 Conclusion

- 7.1 This Planning Statement provides a detailed planning assessment of the proposals at the application site in relation to national, strategic and local planning policy and guidance. This Statement concludes that the proposed development makes efficient use of land and is acceptable at this location.
- 7.2 On the basis of the above assessment, we consider the principle of bringing the historic commercial use on the site back for a temporary period to enable its occupation to be acceptable for the following reasons:
- The property is currently vacant and does not contribute towards local housing need or economic growth;
 - Although once primarily residential, the area now has a mixture of uses. The property is currently vacant and has had a history of commercial and residential uses. Many neighbouring properties on the street are in mixed commercial use which supports this change of use in this location;
 - Small scale business premises in Camden have been progressively lost during recent years;
 - The temporary reinstatement of commercial office floorspace would yield a significant number of new jobs and contribute to the local economy;
 - There is an end user lined up to occupy the floorspace; meaning that the abovementioned benefits are tangible and deliverable;
 - Through subdivision of the property a residual C3 component could be retained here.
- 7.3 As a direct result of the development proposals, the application will deliver a number of planning benefits for LBC such as job creation and economic growth while retaining and safeguarding the existing residential use. These are significant and material benefits which weigh in favour of a grant of planning permission.
- 7.4 The principle of a development proposed at the site is supported by the NPPF, the development plan and emerging policy. The development principle has also been endorsed during pre-application discussion the LBC officer. It is concluded that the proposed development complies with the objectives and requirements of the development plan. We respectfully submit that planning permission should be granted for the development.

Appendix 1 – Heritage Statement

Introduction

- 1.1 This Heritage Statement has been prepared by Lichfields on behalf of the Bill Thomas Settlement to assess the effects of the proposed internal works involved in a temporary subdivision and change of use of 62 Doughty Street from the established C3 use to mixed B1 commercial floorspace with ancillary short-stay business visitor accommodation and a single self-contained residential unit at lower ground floor level.
- 1.2 It accompanies an application for planning permission and a and listed building consent application.
- 1.3 62 Doughty Street is a large Grade II listed property. The property is located within the Bloomsbury Conservation Area in the London Borough of Camden.
- 1.4 The Bill Thomas Settlement wishes to make a number of minor internal alterations to 62 Doughty Street with the aim of improving the internal layout on the ground and first floor to provide temporary office space. There are no external works proposed.
- 1.5 Previous applications 2010/0187/P and 2010/0187/L involved a change of use of a grade II listed building from offices (class B1) to a single dwelling house (class C3) and associated alterations. This application was approved along with Listed Building Consent.
- 1.6 In accordance with the requirement of Paragraph 189 of the National Planning Policy Framework (NPPF) this statement establishes the significance of the heritage assets concerned and assesses the impact of the proposed development on their significance.

2.0 The site and Surrounding area

- 2.1 The site is located north of Holborn on the corner of Doughty Street and Roger Street. The property contains six bedrooms and is a five-storey (including lower ground floor) terraced house with a Grade II listing, falling within the Bloomsbury Conservation area.
- 2.2 Doughty Street comprises a mixture of three and four-storey terraces with basements and mansard roofs. All of the buildings within the street are grade II listed, with the exception of Dickens' House Museum at No 48 which is Grade I listed.
- 2.3 Doughty Street and the surrounding area were first built as residential dwellings though were then converted for commercial purposes. Throughout the area there has been a trend towards converting the townhouses in office use back into single family residential use. This has been the case on Doughty Street, including at No. 21.
- 2.4 No. 62 was rebuilt in 1974 as a facsimile. As such, the interior is entirely non original, has no heritage value and the proposed internal works will not affect the character or appearance of the listed building or conservation area. The buildings Grade II listing is a function of its group value as part of the wider terrace.
- 2.5 The building is of heritage significance as a statutorily listed building, but its value is entirely connected to the building's street elevation and its relationship with adjacent terraced properties in the wider street scene. The interior makes no contribution to its significance as a heritage asset.

3.0 Policy Assessment

- 3.1 The relevant statutory development plan for the Site comprises The London Plan (2016) and The Camden Local Plan adopted (2017).
- 3.2 Material considerations include:
- 1 National Planning Policy Framework (NPPF) (February 2019);
 - 2 National Planning Practice Guidance: Historic Environment (July 2019);
 - 3 The Intend to Publish London Plan (December 2019), which holds substantial weight in the planning process as it is at an advanced stage of preparation. As there is no material difference between the heritage policies of the current and emerging London Plan which would affect this assessment, only the current London Plan is referred to below;
 - 4 The Bloomsbury Conservation Appraisal (2011)
- 3.3 Chapter 16 of the NPPF requires that, in determining planning applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).
- 3.4 London Plan (2016) Policy 7.8 states that London’s heritage assets including listed buildings, should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- 3.5 Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings. LBC will also resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.

4.0 Proposed Internal Alterations

- 4.1 As shown on the photographic schedule submitted with the application, the property contains no significant internal heritage components. As it was a replica in 1974, it is only the exterior of the property which is of value as part of its group value and there are no external works proposed.
- 4.2 The works required to accommodate the proposed temporary change of use would be internal only and confined to the lower ground and third floor, with the physical interventions being minimal and temporary in nature.
- 4.3 The proposal includes the internal reconfiguration of the Lower Ground Floor to provide a 2 Bedroom flat, with a kitchenette and living room. Also proposed, the provision for two glazed escape doors for the 2 bedrooms facing out onto the garden terrace access-way.
- 4.4 No work is proposed elsewhere in the building. There is no decorative plasterwork in the building and no changes to joinery are envisaged.

5.0 Heritage Assessment

- 5.1 The Pre-application process confirmed that proposals would not impact the setting or significance of the conservation area or listed building, owing to the fact that the proposals comprise of minor physical alterations to the interior of the building only and are minimal and temporary in nature.

5.2 London Plan Policy 7.8 requires listed building to be identified in order to enhance their significance. The proposals do not conflict with this policy as it is only the internal of the building being altered.

5.3 Doughty Street properties are listed by grouping and it is considered that No. 62 is not of the same significance given its reconstruction as a replica in 1974.

6.0 Conclusion

6.1 The proposals have been designed to improve the quality of the lower ground floor and third floor with minimal alterations to allow a temporary subdivision and change of use of 62 Doughty Street from the established C3 use to mixed B1 commercial floorspace with ancillary short-stay business visitor accommodation and a single self-contained residential unit at lower ground floor level.

6.2 An understanding of the history of No. 62 Doughty Street has been established which demonstrates that the property was rebuilt in 1974 as a facsimile. As such, the interior is entirely non original and the proposed works will not affect the character or appearance of the listed building or conservation area.

6.3 It is noted that the neighbouring buildings on Doughty Street are in a mixture of business and residential use and the area has a history of the buildings fluctuating between residential and commercial use. The proposed temporary change in use is therefore consistent and reflective of the character of Doughty Street, the wider grouping of listed buildings and the surrounding conservation area.

6.4 In accordance with NPPF paragraph 192, London Plan Policy 7.8 and local policy D2 the proposed scheme would not impact upon the significance of No. 62 Doughty Street.

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