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**Date:** 14th August 2020  
**Our ref:** 61915/01/BK/TJ/18669210v3  
**Your ref:** PP-08979668

Dear Jaspreet

**62 Doughty Street: Planning Application and Listed Building Consent for the temporary subdivision and change of use 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**

On behalf of our client, The Bill Thomas Settlement, please find enclosed an application seeking planning permission and listed building consent for the temporary change of use to introduce mixed B1 commercial floorspace with ancillary short-stay business visitor accommodation and a single self-contained residential unit at lower ground floor level for a period of three years at 62 Doughty Street. The building which is currently vacant was constructed in the 1970s in replica of the wider terrace and is listed (Grade II) for group value. The application follows constructive pre-application discussions with officers on the 15<sup>th</sup> July 2020 during which the principles of the development were agreed.

**Application Submission**

This application has been submitted via the Planning Portal (ref. PP-08979668) and comprises the following:

- 1 Completed Application Form for Full Planning Permission and Listed Building Consent;
- 2 This Cover Letter;
- 3 Planning Statement, prepared by Lichfields;
- 4 Heritage Statement, prepared by Lichfields (Appendix 1 of Planning Statement);
- 5 Architectural Drawings, prepared by CLTH;
- 6 Photographic Schedule.

The application fee of £487 (£462 plus £25 admin fee) has been paid online via the Planning Portal for the planning application.

## **Background**

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.

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 single family residential use. This has been the case on Doughty Street, including at No. 62.

## **The Site and Surroundings**

The site is located north of Holborn on the corner of Doughty Street and Roger Street. The property is a five-storey (including lower ground floor) terraced house with a Grade II listing, falling within the Bloomsbury Conservation area. It was built in the 1970s so is a of post-war construction and significantly post-dates neighbouring properties.

The site and surrounding area is located in the Central London area 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.

The site is highly sustainable, located approximately 700m from Russel Square Station and 900m from Chancery Lane Underground Station. As mentioned above it is currently vacant, inefficient and makes no meaningful contribution towards either housing or employment objectives.

## **Proposal**

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. 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.

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.

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. The self-contained lower ground floor accommodation would be used by business visitors associated with the intended occupiers of the temporary commercial floorspace above.

The proposal therefore requires the subdivision of the property to create 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.

## **Schedule of Works**

The only physical works required are to enclose 2 bedrooms in the basement. The works comprise 50 x 100 stud partitions clad in 15mm plasterboard both sides plus fire check ply doors [2no] with stainless steel ironmongery.

No work is proposed elsewhere in the building. There is no decorative plasterwork in the building and there are no changes to joinery planned.

## **Planning Policy Assessment**

In considering the current proposals for this site, we have had regard to the planning policies and requirements as set out in the National Planning Policy Framework (NPPF, 2019), Camden Local Plan adopted (2017), Camden Policies Map (2019), Site Allocations Plan 2013 and the London Plan (2016).

## **Assessment of Proposed Development**

### **Principle of development**

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 Local Plan employment objectives and will deliver significant economic benefits for LBC; it is anticipated that this change of use will provide up to 20 full time jobs. The building will return to residential use following its temporary use as office space.

The site has been vacant since March 2020 when the previous tenants 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.

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. The temporary change of use to reintroduce the commercial element to the property is therefore in line with the local policy E1.

The temporary nature of the change of use would, however, also 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.

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.

### **Temporary replacement of residential floorspace**

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).

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.

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.

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 Effects**

As set out 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.

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). 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.

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.

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.

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.

On this basis, officers from LBC have confirmed through pre-application discussions that the heritage impacts are acceptable. The fabric of the building is modern and would not be affected by the proposed works and the development would not impact on the setting of neighbouring listed buildings or the Bloomsbury Conservation area.

### **Summary**

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.

While the proposal will result in the temporary replacement of some C3 floorspace, the proposal is in general accordance with the statutory development plan. The temporary reinstatement of commercial office floorspace would yield jobs and contribute to the local economy as there is an end user lined up to occupy the floorspace meaning that the benefits are tangible and deliverable.

We trust you have sufficient information to validate and determine the application, but should you require any further information, please contact Jonathan Finch or me.



Yours sincerely

**Tara Johnston**  
Planner

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