

PLANNING STATEMENT

Application for rear extension, external alterations and internal rearrangements to a listed building

25 January 2021

37 Doughty Street
Holborn
Camden
WC1N 2AA

CSJ Reference M).5757

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1. INTRODUCTION

- 1.1. This Planning Supporting Statement has been prepared on behalf of 37 Doughty Street Ltd, the owner of 37 Doughty Street and applicant. It supports an application for full planning permission and Listed Building Consent for the refurbishment and improvement of 37 Doughty Street. The property is in a poor state of repair and would benefit from the restoration of heritage features of significance together with the rationalisation of the existing seven apartments into five.
- 1.2. The formal description of development is set out below:
- Rear extension, external alterations and internal rearrangements to create 5 no. dwellings*
- 1.3. No. 37 Doughty Street is a large Georgian townhouse which forms part of a terrace of Grade II Listed properties, nos. 29-38. The site is also located within the designated Bloomsbury Conservation Area, widely considered to be an internationally significant example of town planning.
- 1.4. However, modifications to the external facades of the building over the years have had a negative impact and the property is in a considerable state of disrepair. Internally, many of the remaining heritage features have been compromised by unsympathetic works which were undertaken prior to the building being entered onto the statutory list in May 1974. Accordingly, the new owners wish to improve the quality of the accommodation and restore the heritage features of significance, both internally and externally, to ensure its long-term preservation.
- 1.5. The property is currently arranged as 7no. flats and bedsits over 5 floors. A Certificate of Lawfulness was recently granted for the change of use of the lower ground floor (2017/2297/P) from B1(a) Office Use to Class C3 Use. The property was bought by the previous owners shortly after the second world war and was already divided into apartments at this point. With the exception of the lower ground floor, the apartments have historically been let on 'short term contracts'. As such, the property is well established as C3 Use.
- 1.6. The supporting statement follows detailed consideration of the planning merits of the development proposal, an analysis of the Local Development Framework and assessment of relevant government guidance.
- 1.7. The proposal will help restore a valuable building which is currently in poor state of repair. If approved the proposal will have a positive impact on the heritage asset itself and consequently it will enhance the historic integrity of both the Grade II Listed terrace and Bloomsbury Conservation Area in which it lies.

SUPPORTING DOCUMENTS

- 1.8. In addition to this planning statement, the following documents have been submitted:
- Application Forms and Ownership Certificates;
 - Design & Access Statement by Shu Architects
 - Heritage Statement by Shu Architects
 - Appendix A Photographic Audit and Heritage Survey by Shu Architects
 - Sustainability Statement & Energy Strategy by JMDC Services
 - Construction Management Plan by Urban Creation

- 2038 100 P1 Location Plan
- 2038 101 P1 Existing and Proposed Roof Plan
- 2038 102 P1 Existing Lower Ground Floor Plan
- 2038 103 P1 Existing Ground Floor Plan
- 2038 104 P1 Existing First Floor Plan
- 2038 102 P1 Existing Second Floor Plan
- 2038 102 P1 Existing Third Floor Plan
- 2038 107 P1 Existing elevations
- 2038 108 P1 Existing Section
- 2038 112 P1 Proposed Lower Ground Floor Plan
- 2038 113 P1 Proposed Ground Floor Plan
- 2038 114 P1 Proposed First Floor Plan
- 2038 115 P1 Proposed Second Floor Plan
- 2038 116 P1 Proposed Third Floor Plan
- 2038 117 P1 Proposed Elevations
- 2038 118 P1 Proposed Section
- 2038 120 P1 Panelling Details
- 2038 121 P1 Proposed Front Door
- 2038 122 P1 Front Step Tiling
- 2038 123 P1 Kitchen with rear wall
- 2038 124 P1 Internal Wall Details
- 2038 125 P1 Floor to Ceiling Details
- 2038 126 P1 Skirting, Architraves and Cornicing
- 2038 127 P1 New Door Elevations
- 2038 128 P1 Door Details
- 2038 129 P1 New windows Elevations
- 2038 120 P1 Window Details
- 2038 131 P1 Roof details
- 2038 132 P1 Laundry
- 2038 133 P1 Accessories
- 2038 134 P1 Method Statements

- 2038 140 P1 Internal Elevations 1
- 2038 141 P1 Internal Elevations 2
- 2038 142 P1 Internal Elevations 3
- 2038 143 P1 Internal Elevations 4
- 2038 144 P1 Internal Elevations 5
- 2038 145 P1 Internal Elevations 6
- 2038 146 P1 Internal Elevations 7
- 2038 147 P1 Internal Elevations 8
- 2038 148 P1 Internal Elevations 9
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- 2038 150 P1 Internal Elevations 11

2. SITE DESCRIPTION

LOCAL CONTEXT

- 2.1. The application site entails a mid-terrace building constructed in the late 18th century. The building forms part of a terrace of Grade II Listed properties running from 29-38 on the east side of Doughty Street, near to the junction with Guildford Street.
- 2.2. These two bay Georgian houses comprise five-storeys with a three-storey brick façade and an additional lower ground floor, with white rendered light wells to the pavement and inhabited mansard roofs with dormer windows.
- 2.3. The site is located in the Bloomsbury Conservation Area, which covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east.
- 2.4. The area immediately surrounding Doughty Street was developed between 1746 and 1896 and is dominated by elegant Georgian townhouses. The area is of a well-planned nature, with wide roads and an orthogonal street pattern interspersed with formal gardens.
- 2.5. Many of the properties in the immediate vicinity are Grade II or Grade II* listed and the Registered Park & Garden of Mecklenburgh Square Garden is approximately 50m north of the property. Opposite is Goodenough College, a postgraduate residential community, built around a quadrangle in the late 19th century.
- 2.6. Despite the noticeable disrepair of No.37, there is a strong prevailing character in the area, with the repetition and proportion of the generally well preserved Georgian streetscape giving rise to a particular air of grandeur.

THE EXISTING BUILDING

- 2.7. The front elevation has lost many of its heritage features and is in a considerable state of disrepair in comparison with the rest of the terrace. The entrance door to No.37 has a square head which has lost its entablature and decorative fanlight. The existing brickwork on the front façade is in a poor condition and the black and white tile steps to the upper ground floor entrance have also been lost.
- 2.8. The slate clad mansard roof has a dormer window with two sloped windows adjacent. They are a modern addition although not particularly visible from the wider conservation area. Many of the original plain sash windows to the lower ground floor have also been replaced with modern style windows. The property is fronted with black painted cast iron railings.
- 2.9. The rear elevation of No.37 consists of brick with a Victorian rear extension, with the lower ground floor wall comprising a white render. Many of the original sash windows have been lost and various soil vent and rain water pipes have 'grown' over the façade, marring the appearance of the property.
- 2.10. The property was originally built as a townhouse with kitchens to the lower ground level and servant accommodation to the third-floor mansard. At some point shortly after the second world war the property was divided into apartments, with much of the original character and historic value lost as a result. However, there are some features that the building has retained. This is discussed in further detail in the accompanying Heritage Statement with Appendix A by Shu Architects which contains a full audit of the building.

- 2.11. The site is highly sustainable, being within walking distance of a range of shops, amenities, cafes, bars and public transport links. The site is a 10-minute walk from Russel Square and Chancery Lane underground stations. Bus services also run along Theobald's Road.

HERITAGE

- 2.12. No.37 Doughty Street is Grade II listed as part of the terrace stretching from no. 29 – 38. The listing description states:
- 2.13. The building was listed in 1974 and forms part of a terrace of Grade II Listed properties running from 29-38. The listing description states:

Numbers 29 - 38 and attached railings, 29-38, Doughty Street; Terrace of 10 houses. 1794-1810. Built by G Slaton and G Golden. Darkened multi-coloured stock brick with later patching. Plain stucco band at 1st floor sill level. Slated mansard roofs with dormers. 3 storeys, attics and basements.

2 windows each. Nos 29-34, round-arched doorways with reeded surrounds, cornice-heads, fanlights (Nos 29-31 and 33 & 34 patterned) and panelled doors. No.32 with reeded stucco surround and keystone. Nos 35-38, square-headed doorways with stucco surrounds with pilasters and modified cornices, fanlights (Nos 35 & 38 radial) and panelled doors. Gauged brick flat arches to recessed sash windows, Nos 29-34 with glazing bars. Nos 32-38 with cast-iron balconies to 1st floor windows. Stucco cornices and blocking courses. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.

- 2.14. An assessment of the heritage significance of the building is set out in the accompanying Heritage Statement by Shu Architects.
- 2.15. The site is also located within the Bloomsbury Conservation Area, pertinent information of which is included within the Bloomsbury Conservation Area Appraisal and Management Strategy published in April 2011. The document identifies 10 'sub areas' within the Conservation Area. The application site lies within Sub Area 10 (Great James Street/Bedford Row), which has a clear street hierarchy on a grid layout with Doughty Street being one of the wider thoroughfares, characterised by larger properties. The following commentary from the appraisal is pertinent:

Pressure for redevelopment has continued over the last twenty years and a series of modern interventions have resulted, developed particularly by the institutions and to provide housing. More recently there has also been a trend towards converting townhouses in office use back to residential use, typically in streets such as Great James Street and Doughty Street.

The townhouses along John Street, Doughty Street and Guilford Street are of significance as they are almost complete Georgian streets, lined with terraces. John Street dates from the mid 18th century, whilst Doughty Street and Guilford Street span the late 18th century to the early 19th century. Although later in date, the townhouses are similar in plan form to those in Bedford Row, but are of a smaller scale and footprint. They are constructed from yellow stock brick, the earlier examples with red brick trim and the later examples with stucco detail. Various designs of doorcases, fanlights and balconies are evident. Doughty Street comprises a mixture of four-storey terraces with basements and three-storey terraces with basements and mansard roofs.



Extract from Borough of Camden Policies Map

RELEVANT DESIGNATIONS

2.16. In terms of planning policy designations, the following apply:

- Grade II listed;
- The site is within the Bloomsbury Conservation Area (Sub Area 10);
- Flood Zone 1;
- Air Quality Management Area;

3. PLANNING HISTORY

- 3.1. A search of the Camden Borough Council planning application website has revealed the following planning history:

2017/2297/P Certificate of Lawfulness for proposed use as studio bedsit unit at basement floor level rear (Class C3 Use).

Status: Granted 24th April 2017

2017/0409/P Change of use from office (Class B1 Use) at basement floor level rear to studio self-contained flat (Class C3 Use)

Status: Withdrawn 28th February 2017

8870170 Alteration of in internal partition and plumbing arrangements to afford individual ablution for each bedsit at 2nd floor and improve facilities at basement flat.

Status: Withdrawn 20th September 1988

HB2631 The removal of a partition in the first floor front room and alterations in the rear ground floor room to provide a bedroom, bathroom and kitchen.

Status: Listed Permission 6th March 1981

- 3.2. The planning history for the site, available on Camden Borough Councils files, dates back to 1981, where an application for Listed Building Consent for internal alterations was granted consent.

4. PLANNING POLICY CONTEXT

- 4.1. This section provides an overview of the policy context within which this application is made.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

CAMDEN LOCAL PLAN (2017)

- 4.3. The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough. The following policies apply in this instance:
- Policy H3 Protecting existing homes
 - Policy H6 Housing Choice and Mix
 - Policy H10 Housing with shared facilities
 - Policy A1 Managing the impact of development
 - Policy D1 Design
 - Policy D2 Heritage
 - Policy T1 Prioritising walking, cycling and public transport

SUPPLEMENTARY PLANNING DOCUMENTS, GUIDANCE AND ADVICE

- 4.4. The following documents are considered relevant to the development proposal:
- CPG1: Design
 - CPG2: Housing
 - CPG3: Sustainability
 - CPG4: Basements and light wells
 - CPG5: Amenity
 - Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

THE NATIONAL PLANNING POLICY FRAMEWORK

- 4.5. The National Planning Policy Framework (NPPF) sets out government planning policy as a material consideration and advises that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.6. The NPPF should be referred to as a whole, but Chapter 7 'Requiring good design', Chapter 12 'Achieving well-designed places' and Chapter 16 'Conserving and enhancing the historic environment' are of particular importance in this instance.
- 4.7. Paragraphs 194-196 are of relevance to the determination of the proposal, particularly 196 which states:

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

RELEVANT CASE LAW

Barnwell Manor Wind Energy Ltd v E.Northants DC, English Heritage, National Trust & SSCLG [2014] EWCA Civ 137

- 4.8. The judgment in Barnwell Manor emphasised that “there is a need to give considerable importance and weight to any harm...when carrying out the planning balance”.

R (on the application of) Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC 1895 (Admin)

- 4.9. Forge Fields reiterated Barnwell Manor’s approach, finding that the statutory duty imposed under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings and their settings requires that ‘considerable weight’ must be accorded to any harm to listed buildings or their settings. The judgment concluded:

‘The presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation...’

Palmer v Herefordshire Council and Anr [2016] EWCA Civ 1061

- 4.10. The Court stated that where a proposed development would affect a listed building or its setting in different ways, some positive and some negative, the decision maker may legitimately conclude that although each of the individual effects has an impact, taken together there is no overall adverse effect on the listed building or its setting.
- 4.11. The Case confirmed that it is appropriate to consider both the quality of the listed building, the degree of heritage harm and the degree of heritage benefit. It said that the duty to have special regard to the desirability of not harming the setting of a listed building cannot mean that any harm, however minor, would necessarily require the refusal of planning permission.

Bedford Borough Council v SSCLG [2013] EWHC 2854 (Admin)

- 4.12. Two principal points arise in this case. First, it is clear that the test for the grant of planning consent varies according to the quantum of harm to the significance of the property. There is a presumption against granting consent if the harm to significance is substantial or if there is a total loss to significance. Second, if the harm is less than substantial, it is simply a question of weighing that harm against the public benefits of the proposal. Public benefits can include heritage benefits.

5. THE PROPOSED DEVELOPMENT

- 5.1. The application seeks planning and listed building consent to refurbish and restore the heritage features of the existing building both internally and externally. The proposal also seeks to improve quality of accommodation and rearrange the internal layout, providing 5 no. flats in total, one to each floor.
- 5.2. The development is detailed in full on the proposed plans and in the accompanying Design & Access Statement and Heritage Statement by Shu Architects. A summary of the proposals is set out below:

EXTERNAL WORKS

Front Elevation

- Removal of cement pointing to main façade and repointing of the brickwork with a lime mortar
- Reintroduction of entablature and fanlight to the main entrance door
- Replacement of the tile to front entrance steps with black and white tiles
- Replacement of Lower Ground Floor windows with 2no. timber sash windows incorporating slim line double glazing
- Replacement of third floor windows to mansard roof with 2n. sash windows and 2no. fixed windows incorporating slim line double glazing
- Front Lightwell: Alteration of door to plant room

Rear Elevation

- Replacement of upper ground floor elevated walkway and shed to rear with a new walk-on extension for a laundry and boiler room including new access door
- Replacement of the rainwater pipe with black painted heritage style cast aluminium
- Replacement and reduction in soil vent pipes
- Removal of external flue outlets and relocation of external vents. New vents to be black painted aluminium
- Replacement of modern windows with painted timber sash windows with slimline double glazing

General Internal Works

- Acoustic floors to the existing apartments, not communal areas
- Replacement of modern plasterboard ceilings with acoustic fire board ceiling (Identified on 2038 125 P1 Floor to Ceiling Details)
- Removal of picture rails to rooms
- Removal of services through coving and repair to coving by a specialist
- Upgrading of existing ceilings with intumescent paint where required

- Removal of existing ventilation system and replacement with new continuous ventilation system throughout refer to proposed plans, section and document 133
- Existing plaster to internal walls of external façade to be removed and with lime plaster incorporating wood fibre where appropriate. Refer to document 2038 124 & 2038 134

Proposed Works: Lower Ground Floor

- Removal of existing partitions to front room and replacement with new partitions in alternative arrangement including the forming of 2no en suite bathrooms and the separation to form a plant room
- New opening between front and rear main room
- Fixing shut door adjacent to base of stair
- New partition to form a fire lobby at base of stairs. Stair post to remain
- Removal of wall to form kitchen to extension
- New partition to rear of Victorian extension

Proposed Works: Upper Ground Floor

- To entrance hall: removal of dado rail and replacement with timber panelling to match existing
- To entrance hall: removal of meters and boxed out areas and relocation of services to a single service riser to the recess behind the entrance door
- Front room: removal and repair of service meter hatch above room entrance and repair to the lath & plaster
- Location of kitchen to front room including a 2.2m high stud wall to rear for services including ventilation
- Raising of the door head to the double doors connecting the front and rear room

Proposed Works: First Floor

- Removal of existing partitions to rear room and reinstatement with new partitions
- Relocation of the kitchen & associated services from adjacent to the chimney breast to far wall with 2.2m high wall to rear for services
- Replacement of ceiling to front and rear room (not communal areas) including coving to front room to replicate ground floor
- Removal of cupboard to communal stair

Proposed Works: Second Floor

- Blocking up of existing doorway and forming 2nd floor as a single apartment
- Replacement of existing door and partition to entrance to apartment with a fire rated one
- Upgrading of door leaf to apartment on third floor so fire rated

- Removal of all partitions to rear room including boxings surrounding window and replacement with boxing out to chimney breast only
- Removal of plasterboard ceiling to rear room and replacement with fireboard ceiling with service void under
- Removal of partition wall to front room and introduction of 2no. en-suite
- Door widened to Bedroom 2 with replica of heritage door leaf and architraves

Proposed Works: Third Floor

- New partition wall to existing kitchen/ dining to form new shower room including boxing out to rear
- Wider door to rear room including new fire door in style to match
- New opening between the two rear rooms to form a kitchen/ living/ dining room with painted timber lining
- New loft access hatch rear room & enlarged loft access hatch to front lobby
- Larger loft access hatch from stair to roof with boarding out to form suitcase store to loft area
- Infill of recess to wall adjacent to no. 36 Doughty Street
- The insulation between and under the existing rafters to sloping mansard and to between the ceiling joists to the loft space

ACCOMMODATION

- 5.3. The proposed development will deliver 5 x residential units (Use Class C3) in the following arrangement:
- Lower Ground Floor – 1 x 2-bedroom flat
 - Upper Ground Floor – 1 x 1-bedroom flat
 - First Floor – 1 x 1-bedroom flat
 - Second Floor – 1 x 2-bedroom flat
 - Third Floor – 1 x 2-bedroom flat
- 5.4. The dwellings fall marginally short of minimum space standards as the scope for expansion is restricted by the envelope of the current building and the size of the heritage floor places. However, the proposal would still significantly improve the space standards and amenity areas of the dwellings overall, whilst the number of bed spaces will remain the same as the existing arrangement.
- 5.5. The difference in GIA between proposed and existing dwellings is included below.
- 5.6. The GIA for the existing dwellings is as follows:
- Flat 1 (1bed) – 48.46m²
 - Flat 2 (1bed) – 45.42m²

- Flat 3 (2bed) – 49.65m²
- Flat 4 (1bed) – 31.76m²
- Flat 5 (1bed) – 24.08m²
- Flat 6 (1bed) – 21.42m²
- Flat 7 (1bed) – 24.69m²

5.7. The GIA for the proposed dwellings are as follows:

- Flat 1 (2bed) – 52.45m²
- Flat 2 (1bed) – 48.51m²
- Flat 3 (1bed) – 45.43m²
- Flat 4 (2bed) – 48.59m²
- Flat 5 (2bed) – 49.42m²

KEY PLANNING CONSIDERATIONS

5.8. Taking into account the proposed development, Development Plan policy, and all other material considerations, there are considered to be five Key Planning Considerations which determine the acceptability of the scheme, to be addressed over the next sections:

- Key Planning Consideration 1 – Principle of development
- Key Planning Consideration 2 – Design and impact on the historic environment
- Key Planning Consideration 3 – Residential amenity

6. KEY PLANNING CONSIDERATION 1 – THE PRINCIPLE OF DEVELOPMENT

RATIONALISING EXISTING RESIDENTIAL UNITS

- 6.1. In reference to the judgement of *Richmond upon Thames LB v SoS & Another 2000*, it is unclear in this instance whether the amalgamation of dwelling houses of a C3 Use would constitute a material change of use in accordance with S55 of the Act. However, for the avoidance of doubt, planning permission is sought alongside listed building consent to cover all aspects of the proposed works.
- 6.2. The long standing use of the property is considered to fall within Class C3. The use probably pre dates planning legislation. The proposal seeks the internal rearrangement of the property and the amalgamation of the existing 7no. units to form 5 no. larger units, one to each floor, resulting in the loss of two residential units.
- 6.3. Policy H3 (Protecting existing homes) of the Camden Local Plan concerns the protection and loss of existing homes and is therefore pertinent. It states:

The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

a. resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided;

- within hostels or other housing with shared facilities; or*
- as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use*

- 6.4. The proposal solely consists of the rearrangement of the internal layout with a C3 Use and the relocation of existing services. As such, it would not involve any net loss of residential floor space and would constitute an improvement on the existing layout in terms of amenity space, fire safety and accessibility.

b. protecting housing from permanent conversion to short-stay accommodation intended for occupation for periods of less than 90 days; and

- 6.5. The proposal does not entail the permanent conversion to short-stay accommodation for periods of less than 90 days. On the contrary, the proposal would likely see the past use of the residential units as 'short term holiday lets' and 'short term contracts' change into more desirable and stable long term contracts as is intended by the applicant. The loss of this type of tenancy is not considered to have a detrimental impact on the market, with there being plenty of other holiday lets available within the area and wider city.

c. resisting development that would involve the net loss of two or more homes (from individual or cumulative proposals), unless they:

- create large homes in a part of the borough with a relatively low proportion of large dwellings;*
- enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or*

- *enable sub-standard units to be enlarged to meet residential space standards. Exceptionally, the Council may support development that involves a limited loss of residential floorspace where this provides for the expansion of existing health premises to meet local needs.*

- 6.6. Whilst it is acknowledged that the proposal would involve the net loss of two individual dwellings, the number of bedrooms provided within the property remains the same. The proposal would result in the loss of two individual bedsits of poor quality and amenity, which would be compensated for by an increased number of 2 bedroom flats provided within the property. As such, there would be no overall loss of accommodation within the borough per capita.
- 6.7. Furthermore, in relation to the above criteria, the existing dwellings are of a poor quality with a poor internal layout, all of which fail to meet residential space standards in accordance with the London Plan 2016. As previously noted, the proposal involves no loss of residential floor space and would provide dwellings of an increased and more suitable size whilst improving the overall amenity, accessibility, health and safety of future occupiers.
- 6.8. Whilst it is recognised that not all the proposed dwellings meet the residential space standards stipulated within London Plan 2016, the units have been increased to the maximum size possible within the envelope of the building and constraints of the historic fabric. Additionally, the proposal still significantly improves the space standards and amenity areas of the dwellings overall, whilst the number of bed spaces will remain the same as the existing arrangement.
- 6.9. Overall, it is considered that the proposal is compliant with all aspects of policy H3. The proposed layout of the property consists of a much more desirable and viable arrangement than existing situation, and the negligible loss to residential units is outweighed by the proposed benefits to amenity, safety, accessibility and heritage. The proposal is therefore deemed wholly acceptable and policy compliant.

7. KEY PLANNING CONSIDERATION 2 – DESIGN AND IMPACT UPON THE HISTORIC ENVIRONMENT

- 7.1. Policy D1 (Design) aims to secure high quality design in development that respects local context and character whilst preserving and enhancing the historic environment and heritage assets.
- 7.2. Policy D2 (Heritage) states that the Council will not permit the loss or substantial harm to a designated heritage asset, including conservation areas and listed buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweighs that harm or loss.
- 7.3. Section 66 of the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 places a duty on Local Planning Authorities to pay 'special regard' for the desirability of preserving a listed building, its setting and any features of architectural or historic value.

IMPACT UPON THE LISTED BUILDING

- 7.4. It is considered that the heritage value and significance of the building is derived primarily from its external appearance and contribution to the character of the listed terrace and the Bloomsbury Conservation Area. The heritage significance of the front and rear façade is a part of the wider group of properties nos. 29-38 which display a high degree of uniformity in historical architectural character.
- 7.5. However, there are many elements of no. 37 noted within the listing that have since been lost, marring the positive contribution towards the group. This includes the loss of features to the main entrance door and excessive amount of pipework and loss of sash windows to the rear façade.
- 7.6. The improvements and reinstatement of heritage features to the front façade, main entrance and brickwork will have a most positive impact on the heritage asset, the wider listing group and the conservation area as a whole. Further heritage benefits will be provided through the replacement of modern windows with ones of a timber heritage style and the simplification of pipework and services, which will rationalise the cluttered rear façade, reversing previous harmful alterations.
- 7.7. Although the interior of the building is in poor condition and has been remodelled on numerous occasions, the property still possesses several significant heritage features such as the main stairwell and communal areas, along with the upper ground floor front room. However, the setting of these features of significance has been marred by the excessive amount of service runs and meters. The proposal aims to restore internal heritage features through the rationalisation of service runs including the introduction of a central plant room.
- 7.8. Internal works such as the removal of existing partitions / creation of a new layout and the relocation of kitchens and services are necessary to improve the design of the apartments and maximise residential amenity, providing a more conventional layout, with the kitchen next to the living room / dining space.
- 7.9. The installation of slim line double glazing along with other thermal performance measures will improve the sustainability of the building, increasing the long-term viability of the asset.
- 7.10. The proposed extension to the rear of the property at the lower ground floor is simple in design and modest in scale. Its design should have a low impact on the heritage asset. As it provides a dedicated place for washing and drying laundry, we would consider this to provide a significant benefit to the protection of the historic fabric in the long-term.

- 7.11. Whereas the scope of the internal alterations involves the reconfiguration of the layout as well as the restoration of the historic fabric, the external changes to the property are focused on restoring the building's historic features and reinstating its positive contribution to the listed terrace and wider Conservation Area. As such, rather than seeking alterations to the buildings historic form, the considered proposal should be as one that aims to restore the original features and architectural detail that were missing when the properties were entered onto the statutory list in 1974.
- 7.12. The impact of the proposed works on the significance of the heritage asset are considered in greater detail in Section 3 of the Heritage Statement by Shu Architects. It concludes that the vast majority of changes to the listed building will have a positive impact on the significance of the heritage asset, with others having a neutral impact at worst.

IMPACT UPON THE CONSERVATION AREA

- 7.13. Policy D2 stipulates that in order to maintain the character of Camden's conservation areas the Council will take account of Camden's Conservation Area statements, appraisals and management strategies when assessing applications.
- 7.14. The Council will also require that development within conservation areas preserves or, where possible, enhance the character and appearance of the area.
- 7.15. Doughty Street falls within Sub-Area 10 of the Bloomsbury Conservation Area. The character of this particular part of the Bloomsbury Conservation Area is set out in the Camden Council document Bloomsbury Conservation Area Appraisal and Management Strategy.
- 7.16. One particular point of the listing relevant to this proposal refers to the building's significance as part of the streetscape of Doughty Street:

The townhouses along John Street, Doughty Street and Guilford Street are of significance as they are almost complete Georgian streets, lined with terraces. Various designs of doorcases, fanlights and balconies are evident. Doughty Street comprises a mixture of four-storey terraces with basements and three-storey terraces with basements and mansard roofs. All the buildings within the street are grade II listed, with the exception of Dickens' House Museum at No 48, which although architecturally almost identical is listed grade I for historical reasons. p77

- 7.17. The proposed works seek to preserve and enhance the listed terrace and the Conservation Area in accordance with policy D2. It does so by restoring the features upon the front façade of no.37 that are considered to contribute to character and appearance within the Bloomsbury Conservation Area Appraisal and Management Strategy.
- 7.18. The replacement of the decorative fanlight and entablature upon the front door and repointing of the brickwork will have a positive impact upon the streetscape and wider Conservation Area, as will the reinstallation of heritage style timber windows. The use of slim line glazing to these windows has been carefully considered and will only occur in locations less visible within the Conservation Area, such as the rear façade.
- 7.19. It should also be noted that the Conservation Area Appraisal and Management Strategy recognises that the internal reconfiguration of properties is prevalent and not out of place within the Conservation Area:

Pressure for redevelopment has continued over the last twenty years and a series of modern interventions have resulted, developed particularly by the institutions and to provide housing.

More recently there has also been a trend towards converting townhouses in office use back to residential use, typically in streets such as Great James Street and Doughty Street.

THE PLANNING BALANCE

7.20. In line with paragraph 196 of the NPPF, it is necessary to carry out a balancing exercise, weighing any harm to the historic environment against relevant public benefits. The Heritage Statement by Shu Architects has concluded that the proposed works would not cause any harm to the significance of the property, with elements of the proposal having a **neutral to positive** impact upon the identified heritage assets. Therefore, as the scheme results in heritage benefit, it should not be necessary for paragraph 196 to be engaged.

7.21. However, should the LPA consider otherwise, then paragraph 196 of the NPPF applies in which the public benefit outweighs any perceived harm caused by development.

7.22. Paragraph 196 states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.23. The PPG provides commentary on what can be considered a public benefit. It references paragraph 8 of the NPPF which seeks to deliver economic, social and environmental improvements. It also states that public benefits can include heritage benefits, such as:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation*

7.24. In this instance, the benefits include the following specific conservation gains:

- Improving the external appearance of the building as a heritage asset
- Reintroduction of heritage features to front façade and main entrance including entablature and fanlight
- Replacement of the tiles to front entrance steps with black and white heritage style tiles
- Removing of cement pointing and repointing of brickwork with lime mortar
- Replacement of modern windows to both front and rear facades with painted timber sash windows
- Replacement of third floor windows to mansard roof with 2no. sash windows
- Simplification of pipework and services to the rear façade
- Replacement of the rainwater pipe with black painted heritage style cast aluminium
- Restoring the internal heritage features by rationalising service runs and introducing a central plant room
- Removal of dado rail and replacement with timber panelling to match existing

7.25. And more general public benefits, such as:

- Arresting the decay of historic fabric
- Ensuring the long-term use and maintenance of the building
- Enhancing the appearance and immediate setting of the listed building and wider Conservation Area through external works

CONCLUSION

- 7.26. Taking the scheme as a whole, it is considered that the overall impact on the historic environment will be a profoundly positive one that will increase the long-term viability of the asset. Any harm will be more than compensated for by the significant heritage and public benefits. It should be noted that the net enhancement is beneficial to both the listed building, the other buildings in the group listing and the wider conservation area. Therefore, the positive impact should receive significant weight in accordance with S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. As such, the application accords with policy D2 of the Camden Local Plan and the NPPF.

8. KEY PLANNING CONSIDERATION – 4 RESIDENTIAL AMENITY

- 8.1. Policy A1 (Managing the impact of development) seeks to ensure that the amenity of occupiers and neighbours is protected, stating that the Council will grant permission for development unless this causes unacceptable harm to amenity. Factors considered by the Council include visual privacy, outlook, noise and vibration levels, odour, fumes and dust.
- 8.2. The current arrangement of flats is of poor quality with a poor internal layout and a failure to meet national space standards. The property is currently arranged as 7 no. flats/bedsits over five floors. The proposal works seek to rearrange the internal layout so there are 5 no. flats in total, one to each floor. This would be arranged as one bedroom flats to the upper ground and first floor and two bedroom flats to the lower ground, second and third floors.
- 8.3. The internal changes also include the relocation of kitchens and services.
- 8.4. The revised layout is considered to provide the following benefits to residential amenity:
- Increased natural light to properties;
 - Increased space for residents to carry out everyday tasks;
 - Improvement of fire separation including through the upgrading and replacement of modern interventions and introduction of laundry away from the communal staircase;
 - Improvements to acoustic separation between the flats;
 - Replacement of ventilation system, improving ventilation from the kitchen and bathrooms;
 - Improved thermal performance of building.
- 8.5. The replacement windows will be of the same size as the existing ones within the same location. As such, the proposed new works will not increase overlooking or loss of privacy to neighbouring properties.

SPACE STANDARDS

- 8.6. The GIA for the proposed dwellings are as follows:
- Flat 1 (2bed) – 52.45m²
 - Flat 2 (1bed) – 48.51m²
 - Flat 3 (1bed) – 45.43m²
 - Flat 4 (2bed) – 48.59m²
 - Flat 5 (2bed) – 49.42m²
- 8.7. In accordance with the London Plan 2016, minimum floor space standards require a GIA for new dwellings:
- 1 bed dwelling (1 person/2 person) - 39m²/50m²
 - 2 bed dwelling (3 person/4 person) – 61m²/70m²

- 8.8. Whilst the 1-bed dwellings comply with the required space standards, due to the constraints posed by the envelope of the building and heritage floor plates it is not possible for the 2-bedroom dwellings to meet requirements. However, the amenity areas of the flats have been significantly improved from the existing arrangement and the number of bedrooms provided has not changed.
- 8.9. Overall, the design of the proposed development is considered to considerably improve the amenity of future occupiers and comply with all aspects of policy A1.

9. SUMMARY AND CONCLUSION

- 9.1. This application seeks planning permission and listed building consent to extend, refurbish and internally rearrange the existing building to provide 5no. apartments.
- 9.2. The property is currently in a poor state of repair both internally and externally and therefore detracts from the heritage significance of the listed group nos. 29-38. As such, No. 37 requires significant investment and action to ensure its long-term preservation.
- 9.3. Whilst the proposal would result in the net loss of two bedsits, this loss is compensated for by the provision of 2-bedroom flats within the property which are of a much higher quality and standard, with the proposed works significantly improving services, amenity and safety for future occupiers. Most importantly, there is no net loss of residential floor space, with the GIA of each dwelling having been increased to the maximum size possible within the constraints of the historic fabric.
- 9.4. The external changes to the property are focused on restoring the building's historic features and reinstating its positive contribution to the listed terrace and wider conservation area.
- 9.5. The improvements and reintroduction of heritage features to the front façade, main entrance and brickwork will have a positive impact and deliver heritage benefits. Further conservation gains will be provided through the replacement of modern windows with ones of an appropriate timber heritage style and the simplification of pipework and services, which will rationalise the cluttered rear façade, reversing previous harmful alterations.
- 9.6. Although the interior of the building is in poor condition and has been remodelled on numerous occasions, the property still possesses several significant heritage features such as the main stairwell and communal areas, along with the upper ground floor front room. However, the setting of these features has been marred by the excessive amount of service runs and meters. The proposal aims to restore internal heritage features through the rationalisation of service runs including the introduction of a central plant room.
- 9.7. Internal works such as the removal of existing partitions / creation of a new layout and the relocation of kitchens and services are necessary to improve the design of the apartments and maximise residential amenity, providing a more conventional Georgian layout, with the kitchen next to the living room / dining space.
- 9.8. The Heritage Statement provided by Shu Architects concludes that the vast majority of changes to the listed building having a positive impact on the significance of the heritage asset, with others having a neutral impact at worst.
- 9.9. Taking the scheme as a whole, it is considered that the overall impact on the historic environment will be a profoundly positive one that will increase the long-term viability of the asset. Any perceived harm will be more than compensated for by the significant heritage and public benefits. In particular, the restoration of a listed building and the enhancement of the streetscape within the Conservation Area, should be attributed considerable weight in the planning process, in accordance with S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 9.10. The design and layout of the proposed apartments is considered to significantly improve the amenity of future occupiers and increase the sustainability of the property. Measures have been put in place to ensure no loss of privacy for future and existing residents.

Given the above, it is considered that the proposed development is in accordance with both national and local planning policy. As such, it should be welcomed by the Local Planning Authority and granted consent accordingly.

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