

**25 John Street,
Camden, London WC1N 2BS**



**Planning Statement
On Behalf of Mr Jones
August 2021**

Contents

1. Introduction2

2. The Site and Surroundings.....4

3. Planning History6

4. The Proposals 12

5. Relevant Planning Policy..... 14

6. Planning Considerations 21

7. Conclusions25

Appendix One Listing Description

1. Introduction

- 1.1 This Planning Statement has been produced on behalf of Mr Jones to support the change of use from office use to residential use at 25 John Street, London, WC1N 2BS ('the site') in the London Borough of Camden.
- 1.2 25 John Street is a Grade II listed building. The building is listed as part of a group listing description covering Numbers 22 – 28 John Street. The listing description is included at **Appendix One**.
- 1.3 The site has been vacant since March 2019.
- 1.4 This Planning Statement provides the details of the site and the surrounding area, planning history and an overview of the proposed development. This planning statement also considers the planning policy context for the development.
- 1.5 The details of the proposals to change the use of the premises from office use (Class E(g)(i)) to residential use (Class C3) are set out in Section 4 of this Statement.
- 1.6 This Planning Statement is accompanied by drawings setting out the detail of the existing layout and the proposed alterations to the listed building to facilitate the proposed change of use from office to residential use.
- 1.7 An Historic Building Report has been undertaken by Donald Insall Associates which sets out the heritage case for the proposed works.
- 1.8 A Marketing Report has been undertaken by Hargreaves Newberry Gyngell Limited Chartered Surveyors who have actively marketed the site as an office for over two years. They demonstrate in their report that there has been no interest in the site for office use.
- 1.9 The rest of this review is set out in the following sections:
 - Section 2. Site and Surroundings
 - Section 3. Planning History
 - Section 4. The Proposals
 - Section 5. Relevant Planning Policy
 - Section 6: Planning Policy Considerations
 - Section 7. Conclusions

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Appendix One Listing Description

2. The Site and Surroundings

- 2.1 The site is located at 25 John Street, London, WC1. The local planning authority is the London Borough of Camden.



- 2.2 25 John Street is a basement, ground plus three upper storeys building and is Grade II Listed.
- 2.3 The listing description is included in **Appendix One** and is referred to in detail in Donald Insall Associate's documents: Design and Access Statement and the Historic Building Report.
- 2.4 The building is currently vacant. The previous use of the building was offices, and the building was last in use as an office in March 2019.
- 2.5 Originally, the building was built for residential purposes. As set out within the submitted Historic Building Report '*25 John Street was erected between 1800 and 1819 as part of a range of terraced houses along the street's west side.*'
- 2.6 25 John Street lies within the Bloomsbury Conservation Area (Sub Area 10 Great James Street/ Bedford Road). The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted in April 2011 for this area.

- 2.7 The properties on the opposite side of John Street are also listed buildings and in the same conservation area.
- 2.8 The site currently is highly accessible, with a PTAL rating of 6a/6b (site lies on the border between these two zones). PTAL 6b represents the most accessible locations. Tube stations in close proximity include Chancery Lane, Farringdon and Russell Square.
- 2.9 The site lies in Central Activities Zone as defined in Camden's Local Plan dated 2017 and the adopted London Plan dated 2021. More details of these designations are set out in Section 5 of this report.
- 2.10 In summary, the site has the following relevant allocations from the London Borough of Camden's Local Plan which was adopted on 3 July 2017:
- Grade II Listed Building
 - Bloomsbury Conservation Area
 - Central Activities Zone

3. Planning History

- 3.1 We set out below, key relevant details of the planning history for the site and immediate surroundings as listed on the London Borough of Camden's website.

25 John Street

- 3.2 From our review of the London Borough of Camden's website there is limited planning history included for 25 John Street. We set out below the more relevant applications:

Application Ref: 2016/4220/L

- 3.3 In 2017, in response to enforcement action, an application was submitted, and Listed Building Consent was granted, for retrospective permission for the insertion of toughened glass panels in the opening between the original front and rear ground floor rooms.

- 3.4 The Council's Decision Notice stated:

'Following enforcement action and subsequent discussions the timber folding doors which were removed to allow for the glazing are to be reinstated and will sit adjacent to and in front of the glass within the front reception room to enable the original character and proportions to be appreciated.'

The glazed panels are considered temporary and reversible and their insertion involved no loss of historic fabric; and following the addition to the application to reinstate the timber folding doors the proposed development is considered to preserve the appearance, and hence the special interest of the grade II listed building.

Special regard has been attached to the desirability of preserving the listed building and its features of special architectural or historic interest, under s.16 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

As such, the proposal is in general accordance with policy CS14 of the London Borough of Camden Local Development Framework Core Strategy, and policy DP25 of the London Borough of Camden Local Development Framework Development Policies. The proposed development also accords with policy 7.8 of the London Plan 2016, and paragraphs 14, 17, 56-68 and 126-141 of the National Planning Policy Framework.'

Application Reference Nos: 8870080 & 8800194

- 3.5 Planning and Listed Building consent were granted on 24 April 1988 for *‘the erection of a conservatory at ground floor level with the rebuilding and enlargement of an extension on the basement ground and first floors as offices...’*

Other Relevant Nearby Planning Applications

- 3.6 We also set out below a number of other planning applications on sites nearby which are of relevance to this case.

Address	Planning Ref No	Description	Decision Notice	Comment
28 John St	2020/5684/L	Listed building consent for internal alterations to Flat 5.	Granted listed building consent 19/01/21	In granting consent, it is noted that the application property forms part of a group of brick and stone 19 th Century properties in the Bloomsbury Conservation Area attached by a four-storey building and shared circulation route to Grade II listed 28 John Street. The proposal seeks to reconfigure the internal spaces of Flat 5 to improve form and functionality. The existing interior plan form makes little contribution toward the historic or architectural interest of the listed building and the reconfiguration of spaces as proposed would result in an acceptable impact on the legibility of the historic plan form and historic fabric.
28 John St	2019/3146/L	Listed building consent for Internal alterations to Flat 1 at Lower Ground Floor level.	Granted listed building consent 22/07/19	In granting consent, it is noted that the works are minor internal configuration at lower ground floor level. The works are minimal, do not affect any historic features of note, nor do they affect the legibility of the original plan form.

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27 John St	2019/4496/P	Application submitted to “renew the existing consents (listed building consent and planning permission) in connection with 27 John Street and 21 John’s Mews. Covering letter states that everything is exactly the same as the drawings consented under 2017/1959/P dated 3 Aug 2017 and 2017/2450/L dated 4 Aug 2017. Copies of consents and S106 agreement included.	Granted 12/02/20	The decision notice identified the reasons for approval and makes reference to the previous approved scheme on the site. Reference is made to the reasons for approval on the previous consent and ref to policy E2 which was emerging at the time of the previous approval (and carried significant weight). The reasons for approval note that the future supply of office space in the borough can meet projected demand; and that the Council will consider alternative uses for older premises. Due to the room layouts and sizes it is not flexible or suitable for modern office accommodation. Due to its listed status the internal alternations required are unlikely to be acceptable. The dwelling house will see harmful interventions associated with the office use removed. The reasons for approval also highlight that housing is a priority use in the Local Plan with this ward being identified as having a low proportion of large dwellings. It concludes that the proposal is acceptable in land use terms.
27 John St	2019/5338/L	Listed building application accompanying planning application (2019/4496/P)	Granted 12/02/20	As above.
27 John St	2017/1959/P	Change of use from publishers office (B1) to dwelling House (C3), demolition of existing rear extension and erection of new single storey rear extension with associated terrace above and new French windows to provide access; alterations	Granted 03/08/17	Reason for approval refers to previous permissions on the site and reference to Policy CS8 and Policy E2 of the emerging Local Plan note that future supply of office space in the borough can meet projected demand and the council will consider alternative uses for older office premises.

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		of rear elevation and replacement of metal windows at 21 John's Mews with new timber sash windows and conversion of garage to habitable room.		Change back to residential will see the removal of many harmful interventions associated with the office use. Housing is identified as the priority land use in the Local Plan and the Holborn and Covent Garden Ward has been identified as having a low proportion of large dwellings. Car free development controlled by S106.
27 John St	2017/2450/L		Granted 04/08/17	Listed building application accompanying planning application (2017/1959/P)
25 John's Mews	2012/4925/P	Works associated with and Change of use from office at ground floor (B1) and flat on first floor (C3) to a single dwelling house. Creation of roof terrace with privacy screen on flat roof and installation of 2 rooflights and external alterations to fenestration.	Granted 26/03/13	Ground floor was vacant office space. First floor most recently used as self-contained flat. Proposal was for a three-bed dwelling. Application accompanied by a statement by commercial agents Montagu Evans assessing the quality of the existing space and its suitability for an alternative or continued use. Constraints of site include low ceiling height, proximity to residential use, lack of servicing facilities, no air-conditioning. Officers considered evidence that there were 198 properties within 1.5Km radius of the site offering a total of over 204,000 sqm of commercial floorspace. Many of these properties were of a higher spec than the site. The expense of refurbishment unlikely to be viable. Evidence that the site had been marketed since Feb 2012. Reference to compliance with Policies CS8 and DP13.
25 John's Mews	2012/5150/L	Listed building application associated	Granted 26/03/13	

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		with planning application 2012/4925/P		
18 John St	2011/1285/P	Continued use of property as one dwelling, plus external alterations.	Granted 31/05/11	Previous consent allowed the change of use to residential.
18 John St	2011/1291/L	Listed building consent associated with planning application 2011/1285/P	Granted 31/05/11	Reference to the fact that the entire building is a single-family dwelling – consented under planning permission PS9904398 and listed building consent LS9904399 both granted March 2000. Previous planning permission PS9904146 granted in April 1999 for the change of use from B1 to single residential dwelling.
16 John St	2012/5456/P	Change of use from office B1 to single dwelling house (C3)	Granted 12/02/13	The decision notice includes reasons for granting permission including reference to Policy CS8 and DP13. S106 agreement included to ensure car free development. Planning history shows a change of use from office to resi was granted on 27/06/2006 (2006/2040/P)
10 John St	2015/2037/P		Granted 02/02/16	The decision notice includes reasons for granting permission including reference to Policy CS8 and DP13 of the LDF (now superseded). S106 agreement included to ensure car free development. Evidence submitted included details on originally built as a dwelling, layout and flexibility not suitable for offices, building services inc. aircon, lack of raised access floors or suspended ceilings, lack of WC's on each floor, limited disabled access and lack of lift, parking and servicing, structural

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				limitations for heavy equipment. Expert advice provided by commercial agents (Knight Frank and Morgan Lambert & Partners).
42 Doughty St	2017/6024/P	Change of use from office to a single dwelling house, partial demolition of existing 3 storey rear closet wing and erection of replacement 2 storey closet wing with single storey side return, repair and restoration of historical interior inc replacement fenestration across front entrance.	Granted 29/01/2018	Marketing evidence provided. Including reference to the features lacking in the property as sought by modern office occupiers incl: open plan layout, a lift, wheelchair accessible, separate M/F and wheelchair toilets, suspended floors and ceilings to accommodate services, modern heating, double or secondary glazing and a suitable means of escape. A cost of the works required to make the building suitable for offices was included in the application. The application also includes a marketing assessment (6months) and a commercial agent's letter.

4. The Proposals

- 4.1 The proposed development is for the change of use of the building at 25 John Street from office use to residential use. It is proposed that the building will be occupied as a single-family dwelling house. This requires a change of use application.
- 4.2 Internal and external alterations are also proposed to the listed building to facilitate the proposed change of use of the building to a single residential dwelling.
- 4.3 Sensitive alterations to the building are proposed, mostly to remove the 20th Century alterations relating to the office use, in keeping with the character of the Grade II listed building. The alterations will not provide any increase in the overall floorspace.
- 4.4 Full details of the proposed works are set out within the submitted Design and Access Statement and Historic Building Report, both prepared by Donald Insall Associates.
- 4.5 In summary:

External Alterations

- To replace the existing timber service stairs with traditionally designed metal service stairs to the front elevation at basement level.
- Installation of new external wall lights adjacent to front door and at basement level and installation of new doorbell and porch light.
- Installation of new wastepipes at the rear of the property.
- New painted timber casing around the existing service outlets to the first floor roof to the rear of the property.

Internal Alterations

- **Basement Level** – Works to include removal of modern fixtures and fittings including the modern suspended ceiling, AC units, consumer units and other meters and associated cabling at high level, modern cabinets and kitchen fixtures. Modern partition walls and doors to be removed so that the basement can be internally reconfigured. Traditionally designed timber shutters to be installed to the door opening to the lightwell to match the historic shutters on the adjacent window opening.

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- **Ground Floor** – Works to include the removal of modern fixtures and fittings including modern service risers, electric trunking, office fire alarm and potable water supply pipe, modern radiators and their casings, the modern pendant light from the front room, the modern tubular handrail from the rear conservatory and the partially glazed timber door and overhead light which subdivides the hallway. New lightweight cabinets will be installed and the floorboards beneath the carpets are proposed to be refurbished.
- **First Floor** – Works to include the removal of modern fixtures and fittings including the modern service riser, electric trunking and potable water supply pipe, modern lightweight partition walls and doors and sanitary fittings and the modern pendant light. New partitions and doors are proposed to be installed within the modern extension to create a reconfigured WC and shower room with new fittings and a new central pendant light to be installed to the front room. The floorboards beneath the carpets are proposed to be refurbished.
- **Second Floor** – Works to include the removal of modern fixtures and fittings including the modern service riser, electric trunking and potable water supply pipe, the modern chimneypieces and hearth to the north wall of the front room to be replaced with a new chimneypiece of traditional design. It is also proposed to remove the modern door and architrave within the arched opening off the staircase into the landing. New traditionally design radiators would be fitted, and the rear room will be subdivided with a new partition wall and door to create a bathroom and dressing area, with new sanitary fittings and built-in cabinets installed. Existing cornice and skirting to be restored to match the adjacent.
- **Third Floor** – Works to include the removal of modern fixtures and fittings; including modern radiators and their casings; the modern service riser and modern electric trunking and potable water supply pipe, modern partitions forming a WC to the southwest rear room to be removed to create a single bathroom. A new timber panelled door and architrave opening would be created between the two rear rooms to enable en-suite access. New lightweight partitions would be installed to the western side of the front room to create a small bathroom with new sanitary fittings and walk-in wardrobe. It is also proposed to install slim-line secondary glazing to the front windows.

- 4.6 Please refer to the Donald Insall Associates Historic Building Report for the full justification for each the proposed works in Heritage terms, and their Conclusions on the positive overall contribution the works will make to the Listed Building.

5. Relevant Planning Policy

- 5.1 We set out below a summary of the key policy considerations for the proposed development as assessed against the relevant guidance and policies within the NPPF and the Development Plan.
- 5.2 The key planning policy issues for the proposed development include:
- the proposed change of office floorspace (Class E(g)(i)) to residential use (C3),
 - proposed works to a Grade II listed building in a conservation area.

National Planning Policy Framework

- 5.3 The updated National Planning Policy Framework (NPPF) was published in July 2021. This is part of the Government's ongoing reforms to make the planning system less complex and more accessible and promote sustainable growth.
- 5.4 The updated NPPF retains a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would '*significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole*' (NPPF para 11).
- 5.5 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the determination of planning applications must be made in accordance with the development plan, unless '*material considerations*' indicated otherwise.
- 5.6 The NPPF states at para 60 that '*To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*'
- 5.7 The NPPF also considers how to make the most effective use of land. Para 120 d) states that '*Planning policies and decisions should: promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock ups and railway infrastructure).*' The footnote to this point states that '*As part of this approach, plans and*

decisions should support efforts to identify and bring back into residential use empty homes and other buildings, supported by the use of compulsory purchase powers where appropriate.'

- 5.8 Para 123 of the NPPF sets out that LPA's 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 NPPF states that *'in particular, they should support proposals to: a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework.'*
- 5.9 The NPPF also promotes conservation and enjoyment of the historic environment. Para 194 of the NPPF sets out that, *'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage asset that may be affected by a proposal...'*
- 5.10 Para 197 also states that local authorities should take account of:
- *'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; and*
 - *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - *The desirability of new development making a positive contribution to local character and distinctiveness.'*
- 5.11 Para 202 of the NPPF 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.'*

The Development Plan

- 5.12 The Development Plan relevant to the site comprises the following:
- a. The London Plan (March 2021); and
 - b. The London Borough of Camden Local Plan (July 2017).

Emerging Planning Policy Framework

The London Plan

- 5.13 The need to meet the housing needs of the capital is a clear priority in the adopted London Plan.
- 5.14 Policy E1 - Offices states at Part I that *'The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.'* Part G relates to the need for a range of suitable workspace including lower cost and affordable workspace and Part H states that the scope for the reuse of otherwise surplus large office spaces for smaller office units should be explored.

The London Borough of Camden Local Plan 2017

- 5.15 The Camden Local Plan includes strategic policy G1 covering the delivery and location of growth in the borough. This policy sets out Camden's objectively assessed needs to 2031 for 16,800 additional homes and 695,000 sqm of office floorspace. The most significant growth is expected to be delivered in the growth areas of Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road.
- 5.16 The site does not lie within a designated growth area.
- 5.17 Camden's Local Plan Policy H1 seeks to maximise housing supply. Policy H1 states that self-contained housing is the priority land use of the Local Plan.
- 5.18 Para 3.30 seeks to make the best use of sites to deliver housing. However, this para does state that *'the Plan seeks to protect existing uses on site, such as business premises, community uses and shops.'*
- 5.19 Policy H4 is also relevant which seeks to maximise the supply of affordable housing. Camden has an expectation of a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more.
- 5.20 Policy H7 seeks a mix of dwelling sizes in developments, including large (over 3 beds) and small units, including the conversion of existing homes and non-residential properties. The supporting text at para 3.193 and 3.194 acknowledge the need to be flexible, taking into account the character of the development and any significant features in heritage assets that may restrict alterations.

- 5.21 The Local Plan encourages investment that supports business growth creating further job opportunities for Camden residents and developing the infrastructure that will help businesses to thrive. This desire for a strong economy is balanced with the need to ensure that the borough's housing targets are achieved as set out above.
- 5.22 Policy E1 seeks to secure a successful and inclusive economy in the borough. Policy E1 includes:
- b) 'maintaining a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources,'*
- f) 'direct new office development to the growth areas, Central London, and town centres in order to meet the forecast demand of 695,000 sqm of office floorspace between 2014 and 2031' and*
- g) 'safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers'*
- 5.23 Para 5.6 sets out that Camden have a large proportion of small businesses, with 83% employing less than nine people and a further 10% employing between 10 and 49 employees. However, it states that *'premises suitable for small businesses as well as medium sized enterprises are currently under pressure from rising land values, limited land availability and 'permitted development' rights (B1a to C3).'*
- 5.24 As set out below, the Council has introduced Article 4 Directions to remove the permitted development right to convert offices to homes. The site at 25 John Street is included in this Article 4 Direction area and therefore does not have permitted development rights for the move between office to residential use.
- 5.25 Para 5.25 confirms that the majority of demand for office floorspace will be met at Kings Cross through the implementation of 444,000 sqm of permitted office space in Kings Cross Central. Plans for further, large scale, office development in Euston envisages in the region of 180,000 to 280,000 sqm of business floorspace being provided in the second part of the plan period.
- 5.26 We note that this means approx. 624,000 – 724,000 sqm of the objectively assessed office floorspace need of 695,000 sqm is proposed to be met at Kings Cross and Euston during the plan period.
- 5.27 Policy E2 promotes and protects the provision of suitable employment premises and sites. This policy seeks to resist the development of business premises and sites for non-business uses unless it is demonstrated to the Council's satisfaction that:

- *'a) the site or building is no longer suitable for its existing business use; and*
- *b) that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.'*

5.28 The supporting paragraphs to Policy E2 provide guidance on what the LPA will take into account when assessing the loss of existing employment premises. Para 5.37 lists the various factors including:

- The suitability of the location for any business use;
- Whether the premises are in a reasonable condition to allow the use to continue;
- The range of unit sizes it provides, particularly suitable for small businesses; and
- Whether the business use is well related to nearby land uses.

5.29 Para 5.39 states that in addition to the factors above from para 5.37, the applicant must demonstrate that there is no realistic prospect of demand to use the site for an employment use. The applicant *'must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, including a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.'*

5.30 Para 5.53 considers live/work premises and notes that they can provide a valuable contribution to the range of business premises and may enable certain sites to remain in employment use. It states that *'The Council will allow live/work developments where they do not result in the loss of sites that are suitable for continued business use or the loss of permanent housing.'*

5.31 Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours.

5.32 Good design and the protection and enhancement of heritage assets is also a key concern in the adopted Local Plan. Policy D1 seeks to secure high quality design in development.

5.33 Policy D2 sets out the Council's approach to heritage. Policy D2 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 outweigh that harm or loss.

London Borough of Camden Planning Guidance (CPG) Employment Sites and Business Premises, March 2018

- 5.34 In addition to the adopted Camden Local Plan, Camden has produced a Supplementary Planning Document on Employment Sites and Business Premises. This document is dated March 2018.
- 5.35 This document supports the Camden Local Plan policies E1 Economic Development and E2 Employment premises and sites.
- 5.36 Further detail is included on the marketing evidence required to support an application involving the loss of employment uses in line with Policy E2.
- 5.37 The evidence required includes:
- Use of a reputable local or national agent with a track record of letting employment space in the borough;
 - A visible letting board on the property (constant throughout the marketing period);
 - Marketing material should be published on the internet, including popular online property databases such as Focus and should include local or specialist channels where appropriate – e.g. jewellery-specific press in Hatton Garden, through Business Improvement Districts, the GLA's Open Workspace Group or other workspace providers;
 - Existing lawful use of the advertised premises should be included in the marketing materials;
 - Continuous marketing over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed) to the date of the submission of the planning application;
 - Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;
 - Lease terms should be attractive to the market:
 - i. be for at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works
 - ii. and/or include short term flexible leases for smaller premises which are appropriate for SMEs;
 - iii. appropriate rent-free periods should be offered to cover necessary fit out or refurbishment costs.
 - A commentary on the number and details of enquiries received, such as the number of viewings and the advertised rent at the time, including any details of why the interest was not pursued; and

- Where there is an existing employment use then we will require evidence that the tenant intends to move out.

5.38 Section 6 of this Planning Statement sets out the main findings of the Marketing Evidence Report submitted in support of the proposals indicating how we have met these requirements.

Article 4 Direction to remove Permitted Development Rights for change of use from Office to Residential (implemented 31 May 2019)

5.39 The London Borough of Camden has approved proposals to introduce an Article 4 direction in this area to remove permitted development rights for the change of use from office to residential use.

5.40 This Article 4 direction came into force on 31 May 2019 when the exemption that is applied to the Central Activities Zone in London was removed.

5.41 As a result of the Article 4 direction, there are no permitted development rights to convert 25 John Street from office (Class E (g)(i)) to residential (C3 use).

Site Designations

5.42 As set out in section 2 above, the site has the following relevant designations:

- Grade II Listed Building
- Bloomsbury Conservation Area
- Central Activities Zone

6. Planning Considerations

Proposed change of use from office to residential use

- 6.1 25 John Street has been vacant since 11 March 2019 when the previous office occupier went into administration.
- 6.2 The most relevant land use planning policy to consider is Policy E2 from the adopted Camden Local Plan 2017.
- 6.3 This policy seeks to resist the loss of existing business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that the building is no longer suitable for its existing business use and that the possibility of retaining, re-using or redeveloping the site for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- 6.4 There are clear requirements on the evidence needed to address this policy in the Local Plan's Policy E2 supporting text and the adopted March 2018 Camden Planning Guidance on Employment Sites and Business Premises.
- 6.5 Evidence includes continued marketing for a period of 2 years from when a letting board is erected, or the property advertised online. There are circumstances where this may be reduced to 1 years marketing evidence including where the premises have been completely vacant for at least 3 years up to the date of the submission of a planning application.
- 6.6 It is noted that there are a number of previously consented applications for the change of use of from office to residential uses in the wider area. Although a number of these consents pre-date the adopted Camden Local Plan in 2017, the emerging draft plan carried increasing weight prior to its adoption.
- 6.7 The previous planning policy has now been superseded by Policy E2 of the 2017 Local Plan and the March 2018 Camden Planning Guidance.
- 6.8 A particularly relevant application to note was submitted post the adopted of the 2017 Local Plan is the application for 42 Doughty Street which is on the corner of John Street close to the site.
- 6.9 This application Ref 2017/6024/P was granted permission on 29/01/2018. The application was for the change of use from office to a single dwelling house, partial demolition of existing 3 storey rear closet wing and erection of replacement 2 storey closet wing with single storey

side return, repair and restoration of historical interior including replacement fenestration across front entrance.

- 6.10 Marketing evidence was provided to support this application and the application also included a marketing assessment (for 6 months) and an agent's letter.
- 6.11 Planning officers granted planning permission for this change of use on 29 January 2018.

Marketing evidence to demonstrate the lack of demand for office occupiers

- 6.12 We have reviewed the guidance from the London Borough of Camden of the marketing evidence required to support a planning application for the loss of office employment floorspace.
- 6.13 In accordance with these requirements, Hargreaves Newberry Gynge Limited has actively marketed the 25 John Street site for just over two years in respect of both the freehold sale and subsequent offer to let.
- 6.14 The Marketing Report concludes the following:

'Over the last 26 months or so, we have been marketing the building in respect of both the freehold sale and subsequent offer to let, due to the nature of building, there has been a general resistance by office occupiers.

Firstly, this is a grade II listed office building and by nature, potential alterations are significantly limited, this also impacts on the use of the individual floors.

The offices are planned over 5 floors and without the benefit of a passenger lift, is not practical for tenants.

The building is not DDA compliant and together with the absence of a lift, significantly reduces the target market. The offices are primarily served by central heating, and the principle of air conditioning is not practical. Prospective tenants have also been concerned by the lack of flexibility on data and connectivity which is more consistent with a modern building having accessible raised floors and risers.

In this size range, typically 3,000 sq ft, there is a preference by tenants to occupy a single floor within purpose built offices. There is much competition from this sector and examples of availability are shown within the attached Appendix 9. You will note such options provide amenities which 25 John Street is unable to offer.

In light of Covid and the periodic lockdowns, this has severely impacted on the demand for Central London office space which is

expected to remain low for the foreseeable future. This meaning that competition amongst landlords to create lettings is prevalent for the reasons I have mentioned above, 25 John Street becomes even less appealing to office occupiers.'

Use of 25 John Street for residential

- 6.15 As set out in the submitted Historic Building Report, 25 John Street was built for residential use and this application seeks to revert its use back to its original form having been vacant since March 2019.
- 6.16 As demonstrated within the Design and Access Statement, a high-quality residential space can be achieved within the building for future occupiers in accordance with *Policy D1 - Design*.
- 6.17 *Policy H7 – Large and small homes* states that ‘we will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:
- Contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and*
- Includes a mix of large and small homes’*
- 6.18 The Council’s *Dwelling Size Priorities Table* (Para. 3.189 – Table 1) states that there is ‘high’ priority for 3-bedroom properties, which this proposal offers.

Proposed works to the Grade II listed building at 25 John Street

- 6.19 The proposed works are minor in nature and have been sensitively designed. The works include removing modern additions and details associated with the building’s previous use as an office and where possible reinstating the original plan form of the building.
- 6.20 *Policy D1 – Design* states that ‘The Council will seek to ensure high quality design in development... that... ‘preserves or enhances the historic environment and heritage assets...’
- 6.21 The Historic Building Report and Design and Access Statement both prepared by Donald Insall Associates have been submitted in support of the proposed works and demonstrate that there will be no adverse impact to the listed building as a result of the proposals.
- 6.22 We set out below an assessment of the proposed works against the relevant criteria within *Policy D2 – Heritage*:

- e) the minor changes to the external elevations of the building will enhance the appearance of the building within the conservation area;
- j) the proposed change of use from office to residential use and the external and internal alterations to the building will not cause harm to the special architectural and historic interest of the building.

6.23 The Historic Building Report concludes the following in support of the proposed minor works:

'No. 25 John Street is an early 19th Century, Grade II listed building that makes a positive contribution to the character and appearance of the Bloomsbury Conservation Area. The significance of the building is primarily derived from its external appearance and its contribution to the listed terrace, the wider street scene; elements of particular note are the building's façade proportions, the composition and hierarchy of the window openings and its original double pitched roof. The interior plan form has been largely preserved and is of significance, particularly on the principal of the ground and first floors. All floors, however, have seen modern intervention associated with the buildings use as an office, which has been to the detriment to the building's special interest. The proposals are minor in nature, and would see the removal of modern fabric in association with the proposed change of use from an office to a residential dwelling. Where possible, original plan form would be reinstated, while minor plan form changes are proposed to support the long-term use of the building in residential use, the optimum viable use of the building. Appropriate traditional fixtures and fittings would also be reinstated...

...The proposals comply with the relevant policies of the NPPF including the requirement in paragraph 189 to conserve heritage assets 'in a manner appropriate to their significance,' and with relevant local policies in heritage terms including specifically policies D1 and D2 of the Camden Local Plan (2017) and Policy HC1 of the London Plan, and are therefore considered to be acceptable in heritage terms.'

7. Conclusions

- 7.1 25 John Street is a basement, ground plus three upper storeys building located with the London Borough of Camden.
- 7.2 It is Grade II listed and falls within the Bloomsbury Conservation Area.
- 7.3 The building has been vacant since March 2019 when the previous office occupier went into administration.
- 7.4 The proposed change of use of the buildings at 25 John Street to residential use, is required to be justified under the criteria in the London Borough of Camden's adopted Local Plan policy E2, which seeks to retain existing employment sites and buildings.
- 7.5 The Local Plan and the Camden Planning Guidance provides details on what evidence would be required by the local planning authority to support this loss of an existing employment use.
- 7.6 We are aware of the precedent set by a number of other office to residential conversions that have occurred in the immediate surroundings.
- 7.7 A relevant recent consent at 27 John Street for the change of use from office to residential use. This was granted consent on 12 February 2020. Whilst this property had a previous planning permission, the officer's conclusions in the reasons for the approval of the application has relevance to our site.
- 7.8 The officer's decision notice refers to the previous approved scheme on the site. Reference is made to the reasons for approval on the previous consent and ref to policy E2 which was emerging at the time of the previous approval (and carried significant weight).
- 7.9 The reasons for approval note that the future supply of office space in the borough can meet projected demand; and that the Council will consider alternative uses for older premises.
- 7.10 The reasons for approval go on to say that due to the room layouts and sizes it is not flexible or suitable for modern office accommodation. Due to its listed status the internal alternations required are unlikely to be acceptable. The proposed dwelling house will see harmful interventions associated with the office use removed.
- 7.11 The planning officers' reasons for approval also highlight that housing is a priority use in the Local Plan with this ward being identified as

having a low proportion of large dwellings. Officers concluded that the proposal is acceptable in land use terms.

- 7.12 Section 6 of this statement provides a summary of the details of the Marketing Exercise that has been undertaken by Hargreaves Newberry Gyngell Limited for 25 John Street. This summary and their submitted Marketing Statement demonstrate that the Council's policy requirements have been met.
- 7.13 Section 6 also refers to the Donald Insall Associates Historic Building Report, which provides evidence of the benefits that the proposed works will have for the listed building with the removal of the unsympathetic alterations which were introduced to allow the office use of the buildings.
- 7.14 In conclusion, this Planning Statement and the supporting reports provide sufficient evidence to support the proposed change of use of the premises from office use to residential use.

Appendix One – Listing Description

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