

# FREETHS

London Borough of Camden  
Development Planning  
5 Pancras Square  
London  
N1C 4AG



23 December 2022



By Planning Portal: Ref: PP-11732110

Dear Sir/Madam,

**FULL PLANNING AND LISTED BUILDING CONSENT APPLICATION IN RESPECT OF THE PROPOSED CONVERSION OF 18 LITTLE RUSSELL STREET, HOLBORN, LONDON, WC1A 2HL FROM BACKPACKER'S ACCOMMODATION (SUI GENERIS) TO A SINGLE RESIDENTIAL DWELLING (CLASS C3), TOGETHER WITH ASSOCIATED INTERNAL AND EXTERNAL ALTERATIONS, INCLUDING DEMOLITION OF NON-ORIGINAL REAR EXTENSION AND REPLACEMENT WITH NEW EXTENSION**

We act on behalf of Whitehall Place Properties Ltd ("the Applicant") and have been instructed to submit this full planning and listed building consent application in respect of the proposed conversion of 18 Little Russell Street, Holborn, London, WC1A 2HLA from backpacker's accommodation (Sui Generis) to a single residential dwelling (Class C3), together with associated internal and external alterations, including demolition of non-original rear extension and replacement with new extension.

The following information is enclosed for your consideration:

- Completed Application Form;
- CIL Additional Information Form;
- Location Plan (including Block Plan) (ref. 1148 P01);
- Plans 1 – Existing (ref. 1148 P02);
- Plans 2 – Existing (ref. 1148 P03);
- Plans 3 – Existing (ref. 1148 P04);
- Elevations 1 – Existing (ref. 1148 P05);
- Sections 1 – Existing (ref. 1148 P06);
- Sections 2 – Existing (ref. 1148 P07);
- Plans 1 – Proposed (ref. 1148 P08);
- Plans 2 – Proposed (ref. 1148 P09);
- Plans 3 – Proposed (ref. 1148 P10);

Please read our Data Protection Privacy Notice at [www.freeths.co.uk](http://www.freeths.co.uk)

Freeths LLP is a limited liability partnership, registered in England and Wales, partnership number OC304688. Registered Office: Cumberland Court, 80 Mount Street, Nottingham NG1 6HH. Authorised and regulated by the Solicitors Regulation Authority. A full list of the members of Freeths LLP is available for inspection at the registered office.

- Elevations 1 – Proposed (ref. 1148 P11);
- Sections 1 – Proposed (ref. 1148 P12);
- Sections 2 – Proposed (ref. 1148 P13);
- Design and Access Statement (Inglis Badrashi Loddo);
- Heritage Appraisal (The Heritage Practice); and
- Market Study (Christie & Co).

The planning application fee of £464 has been paid via the Planning Portal.

### **Site Context and Designations**

The site is a mid-terrace five storey (basement, ground, plus 3 further floors) property located on Little Russell Street, in Holborn, close to the British Museum (140m north) and Holborn Tube Station (320m south east). The site is in use as backpacker's accommodation and has been for around 40 years. As such the lawful use of the building is Sui Generis.

The building is operated as part of the Astor Museum accommodation and is located approximately 200 metres from the main building, situated on Montague Street. The building is a residential style Townhouse with seven bedrooms and approximately 40 beds, toilets and shower facilities but no communal spaces (e.g. lounge, games room, bar, etc.). Such facilities are only available at the main Astor Museum building.

The surrounding area, in the most part, comprises residential uses, with the exception of some ground floor retail / commercial uses on the corner of Little Russell Street and Bury Place and on the corner of Museum Place.

18–21 Little Russell Street are Grade II Listed buildings. There are a number of other listed buildings surrounding the site, including the Grade I listed Church of St George to the south. The site is also located in the Bloomsbury Conservation Area and an Archaeological Priority Area.

The listing description for 18-21 Little Russell Street states (list entry number 1379347):

*"Terrace of 4 houses. Early C18, refronted mid C19. Stucco. 4 storeys. 2 windows each; No.18, 3 windows. Architraved doorways with console bracketed cornices, rectangular fanlights and panelled doors. 1st floor bracketed sill band and plain band at 3rd floor level. Architraved sashes to ground, 1st and 2nd floor; 1st floor with cornices. 3rd floor plain recessed sashes. Cornice with pulvinated frieze (missing from No.19) and blocking course. INTERIORS: not inspected but noted to retain early C18 plain panelling with box cornices. Dog-leg staircases with moulded balusters."*

Further, the site is located in the Central Activities Zone. The corners of Little Russell Street and Bury Place (east end) and with Museum Street (west end) are designated as primary / secondary retail frontages (although this does not include the site itself). The site is located in Flood Zone 1 and has a PTAL score of 6b (Excellent).

### **Planning History**

The site does not have an extensive planning history, with the only application being listed on the Council's online register of planning applications being as follows:

- **2010/2325/P:** Retention of the building as a single residential dwelling (Class C3) - withdrawn 2010. The reason for the withdrawal is unknown.

### **Proposed Development**

The proposed development comprises the conversion of 18 Little Russel Street from backpacker's accommodation (Sui Generis) to a single residential dwelling (Class C3). The new dwelling would comprise 3 bedrooms, 3 bathrooms, a kitchen/diner, utility room, downstairs W/C, living room and a media room. As such, the dwelling would be suitable for family occupation. This will make a valuable contribution towards this priority land use especially the need for family housing. This would also have the added heritage benefit of securing the optimum viable use for the building, which would provide the long term protection and conservation of the listed building.

In addition to the change of use, associated internal and external alterations are proposed, including demolition of non-original rear extension and replacement with new extension, in order to facilitate the conversion to residential use.

The internal alterations comprise the removal of non-original partitions that subdivide the rear rooms at basement, ground, first and second floors. The non-original openings in the spine wall will be infilled at first and second floors and the original circulation routes restored by reopening doors, which have been fixed shut. At ground floor level, the door to the front room will be reinstated. It is also proposed to replace the existing stairs to the basement so that it complies with Building Regulations (the existing stair to the basement is steep and does not comply both with regards to steepness and head height). The non-original elements associated with the backpacker's accommodation, such as emergency lighting, signage, servicing, alarms etc, will also be removed.

Externally, it is proposed to demolish the non-original single storey rear extension, which is of poor quality, and replace it with a similarly sized rendered extension, which will be fit for purpose and provide a highly insulated, low energy element to the building.

Further details of the proposed development can be found in the Design and Access Statement and Heritage Appraisal submitted with this application.

### **Pre-Application Advice**

A pre-application advice request was submitted to the Council in July 2022 in respect of the proposed development. A formal response was received in November 2022, whereby the Council confirmed that the proposed change of use is considered acceptable in land use, heritage, and housing terms and presents an opportunity to restore some of the historic features of the listed building. The main points in the advice can be summarised as follows:

- **Land Use:** The loss of the visitor accommodation would be acceptable on balance given the poor quality of the hostel accommodation and other available alternatives.
- **Heritage:** The proposal to return the property back to its original use is supported in principle in heritage terms - any physical works should be done in a conservation-sensitive manner

with traditional methods. A single-dwellinghouse is preferable in heritage and conservation terms rather than being subdivided into flats.

- **Amenity:** Would largely provide acceptable living accommodation, however, the proposed basement bedroom may not receive adequate light levels as it is only served by single aspect lightwells.
- **S106:** An affordable housing contribution of £47,000 is required, and the development is to be car free. Both can be secured through a S106 agreement.

#### **Statutory Development Plan**

The planning policy context relative to the proposed development relates to the London Borough of Camden's Local Plan (2017), and the London Plan (March 2021). The National Planning Policy Framework (NPPF, 2021) is a material consideration. The adopted policies which are the most important for determining any future application at this site are considered to be as follows:

##### Local Plan (2017)

- **Policy G1 (Delivery and location of growth):** This policy outlines how the Council will create conditions for growth, in particular to deliver homes, jobs, infrastructure and facilities to meet identified needs. The policy identifies a need for 16,800 additional homes over the plan period. The location of this growth will be concentrated to certain areas, including Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road. Growth will also be directed to areas of high accessibility in central London.
- **Policy H1 (Maximising housing supply):** This identifies self-contained housing as the priority land use for the Local Plan. This policy also protects existing housing but also identifies that where a site is underused or vacant, the Council would expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site.
- **Policy H4 (Maximising the supply of affordable housing):** All proposals for one or more dwellings will be expected to deliver affordable housing. If the final scheme has a capacity of less than 25 homes, the starting position will be 2% affordable units, but increasing by 2% for each home added to capacity. If there are 10 or less units, the Council will accept a payment-in-lieu.
- **Policy H6 (Housing choice and mix):** This sets out that the Council aims to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes. All self-contained homes are required to meet the nationally described space standards.
- **Policy H7 (Large and small homes):** This policy indicates that two and three bedroom properties are a high priority for market housing.

- **Policy E2 (Tourism):** This policy supports the provision of tourism accommodation. Criterion e. seeks to protect existing visitor accommodation (including backpacker accommodation) in appropriate locations – including Tottenham Court Road and Holborn see paragraph 5.59).
- **Policy D2 (Heritage):** The Council will not permit the substantial harm to a designated heritage asset unless it can be demonstrated the substantial harm or loss is necessary to achieve substantial public benefits to outweigh its harm or loss or all of the following apply:
  - The nature of the heritage asset prevents all reasonable uses of the site;
  - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
  - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
  - The harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will require development in a conservation area to preserve and enhance its character or appearance, resist demolition of buildings that make a positive contribution to the area. The Council will also resist proposals for a change of use or alterations and extensions to a listed building that would harm the special architectural and historic interest of the building, or its setting.

- **Policy T1 (Prioritising walking, cycling and public transport):** The Council will ensure walking, cycle and public transport is promoted in new developments, including the need to exceed the minimum requirements as set out in the London Plan for cycle parking.
- **Policy T2 (Parking and car-free development):** The Council will not issue on-street or on-site parking permits for new developments through legal agreements.

London Plan (2021)

- **Policy GG4 (Delivering the homes Londoners need):** Planning and development must ensure that more homes are delivered.
- **Policy SD4 (The Central Activities Zone (“CAZ”)):** The unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced. Further, the attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced, including through public realm improvements.
- **Policy SD5 (Offices, other strategic functions and residential development in the CAZ):** New residential development should not compromise the strategic functions of the CAZ.
- **Policy D4 (Delivering good design):** The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers.
- **Policy D5 (Inclusive design):** Development proposal should achieve the highest standards of accessible and inclusive design.

- **Policy D6 (Housing quality and standards):** Housing development should be of a high quality design and provide adequately-sized rooms (in accordance with Table 3.1). Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables and food waste.
- **Policy H1 (Increasing housing supply):** Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. For Camden, this is 10,380 dwellings.
- **Policy E10 (Visitor infrastructure):** London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.
- **Policy HC1 (Heritage conservation and growth):** Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- **Policy T5 (Cycling):** Securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3 of the Plan.
- **Policy T6 (Car parking):** Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.

## **Planning Assessment**

### Principle of Development

The key policies of relevance are Local Plan Policy E2 (Tourism) and London Plan Policy E10 (Visitor Infrastructure). The accommodation predominately caters for backpackers and is therefore regarded as a tourism related use. Both Policies E2 and E10 encourage tourism related uses, particularly in the CAZ and Policy E2 seeks to resist their loss. Neither policy however offers any specific criterion in order to assess the loss of such tourism use.

A Market Study Report has been prepared by Christie & Co, and this Report looks at the suitability of the site for backpackers' accommodation, the general market trends in London in terms of use performance, and the current and pipeline supply. Overall, it concludes that the site is in need of repair and does not provide the space or layout to operate, or be adapted, to accommodate a standalone facility with communal facilities, as it would become unviable due to its small size. Communal facilities are a key attraction and decision criteria for backpackers and are available at the majority of competitive facilities. The majority of key competitive facilities in London are larger, part of international brands and offer various amenities and facilities such as lounges, game rooms, restaurants and bars, laundry and storage facilities, etc.

London currently has at least 68 backpacker facilities with 2,500 rooms and c. 9,000 beds available with limited new supply in the pipeline. This type of accommodation had an overall occupancy of 84% in 2019, with steady demand and peak months being June, July and October. Due to the Covid-19 pandemic, data is not available for the months of April – July and November – December 2020, however based on the available data, average occupancy amounted to c. 40% for the months open. On this basis, it is considered that there is already a sufficient supply of visitor accommodation in the area (with at least 7 larger branded buildings in the immediate vicinity) and the loss of around 40 backpacker beds will not affect the overall supply of visitor accommodation in Central London / Camden. Indeed, the building is poorly performing, with a reducing occupancy rate (even before the Covid-19 pandemic).

Overall, the Report concludes that considering the market and accommodation demand dynamics, as well as the physical characteristics of the subject property, the property is not suitable for a backpacker's accommodation operation. As such, the proposed conversion of the property to a single residential dwelling would ensure the optimum use of the site. Indeed, housing is a priority use in the Local Plan, particularly in the context that the Council has a Housing Delivery Test score of 79% (2021) (meaning a Buffer is required). This can enable compliance with Local Plan Policy E2 as an exception.

#### Heritage

A Heritage Appraisal has been prepared by The Heritage Practice. This has examined the historic character of the site. The Appraisal has identified that the proposed reinstatement of the building's residential use, along with positive alterations to its plan form, will be a significant enhancement in heritage terms. The proposed works to the building will include a comprehensive refurbishment of its fabric and services in order to secure its ongoing beneficial use and will reinstate its original domestic character. The Appraisal also confirms that the proposals will preserve the key high significance front façade of the listed building, its positive contribution to the streetscene along Little Russell Street and the character and appearance of this part of the Bloomsbury Conservation Area.

Overall, there would be clear heritage benefits associated with the returning of this Grade II listed property in the Bloomsbury Conservation Area back to residential use. Firstly, it would be consistent with its original intended use, bringing the use of the building in line with surrounding uses along Little Russell Street. Further, given there has been a lack of investment / care for the internal layout of the building due to its current use, the proposed restoration and improvement works to both the internal and external appearance of the building are a significant heritage benefit which is considered to outweigh the loss of sub-standard backpacker accommodation. The proposed development therefore complies with Local Plan Policies D1 and D2, London Plan Policy HC1 and the NPPF.

#### Amenity

The proposed dwelling will meet nationally described space standards and will provide acceptable living accommodation in accordance with Policy H6. In response to the pre-application advice received, the originally proposed bedroom in the basement has been amended to instead accommodate a media room, as by its nature, this would be appropriate for a space served by single aspect lightwells only. The proposed development is therefore acceptable in terms of living conditions/amenity, in accordance with Local Plan Policy H6.

### Highways

In terms of highways, the site has excellent access to public transport (PTAL rating 6b) and is to be car free. The proposal includes 2no. secure covered cycle parking spaces in the outbuilding in the rear courtyard of the building. The proposed development is therefore considered acceptable in highway terms, in accordance with Local Plan Policies T1 and T2 and London Plan Policies T5 and T6.

### **S106 Heads of Terms**

The applicant proposes to enter into a Legal Agreement in relation to the proposed development. The Heads of Terms for the legal agreement will need to be agreed by separate negotiation in accordance with the tests set out at paragraph 57 of the NPPF and the regulations governing planning obligations i.e. Planning obligations must only be sought where they meet all of the following tests:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related in scale and kind to the development.

It is expected that the following will be provided:

- Development to be car free.
- Affordable housing contribution.

### **Conclusion**

The benefits of returning this listed property to its original plan form and a single family dwelling are significant. In our view, the benefits and extent of policy compliance outweighs any harm that may be identified from the loss of the backpacker's accommodation. Such a loss will not have any material policy harm in any event as the building has been identified as unsuitable for modern requirements and there is a sufficient supply of such accommodation in the area.

Indeed, the Council, through its pre-application advice has confirmed that that the proposed change of use is considered acceptable in heritage, land use and housing terms and presents an opportunity to restore some of the historic features of the listed building. We therefore respectfully request that this application is approved.

We look forward to receiving confirmation of registration of the application. In the meantime, if you have any comments or require any further information, please do not hesitate to contact me, or my colleague, Mark Harris.



23 December 2022  
Page 9

Yours faithfully

*This letter is approved but unsigned as it is sent electronically.*

Beth Evans  
Senior Associate  
Please respond by e-mail where possible

Enc.