

MADDOX PLANNING

PLANNING STATEMENT

LONDON & MANCHESTER

0345 121 1706

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42-43 Queen Square
April 2023

Description of development

Change of use of building from education (Class F1) to a healthcare facility (Class E).

Type of application

Full planning application

Applicant

Royal Female School of Art Foundation (RFSA)

Contents of this statement

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1.0 Site and surroundings

- 1.1 The site comprises 42-43 Queen Square, which form a four-storey end of terrace property plus basement level, currently used as an adult education centre (Class F1) for the Mary Ward Centre.
- 1.2 The property forms part of a wider terrace along the southern side of Queen Square and is located adjacent to the Italian hospital.
- 1.3 The surrounding area is made up of many different uses, with local restaurants and shops located within 0.1 miles (3-minute walk) of the property. Nearby parks and gardens are also in close proximity and other community and healthcare facilities, including the University College London Hospital, the Royal London Hospital for Integrated Medicine, the National Hospital for Neurology and Neurosurgery and the Wellcome Centre for Human Neuroimaging.
- 1.4 The property is a grade II listed building and is situated within the Bloomsbury Conservation Area. The site is also located adjacent to the grade II listed Italian Hospital and grade II listed 24 Old Gloucester Street. The site is also located opposite the grade II listed 25 and 26 Old Gloucester Street, the grade II* listed Church of St George the Martyr and the grade II listed water pump and bollards south of Queen Square.
- 1.5 The site is located within the Central London Area, the London Plan's Central Activities Zone (CAZ) and is within the Knowledge Quarter. The site is also well connected by public transport, being within a PTAL 6b rated area, indicating its excellent access to public transport.
- 1.6 The site is in flood zone 1 (low probability of flooding), is located in the Greenwich Park Wolfe statue to St Paul's Cathedral protected vista and is in a Tier 2 Archaeological Priority Area.



Above: View of the site from the Queen Square and Old Gloucester Street junction.

2.0 Planning History

- 2.1 We have set out in the table below the most relevant planning history for 42-43 Queen Square. For reference, there are multiple Listed Building Consent applications for minor internal works and discharge of condition applications which have not been included.

Reference/address	Description	Status/decision date
2012/2597/L	Re-opening of existing internal doorway and installation of fire shutter to existing non residential institution (Class D1).	GRANTED 31/05/2023
2012/1467/P & 2012/1572/L	Replacement of glazed roof to ground floor level at rear of education facility (Class D1)	GRANTED 21/03/2012
2011/2838/P & 2011/2841/L	Internal and external alterations including installation of internal doors at basement level and works to front entrance steps.	GRANTED 28/07/2011
2010/1987/P & 2010/1986/L	Internal and external alterations including replacement of a window with a doorway and remodelling of rooms at basement level and alterations to internal doors at first floor level, all in association with existing education facility (Class D1).	GRANTED 10/06/2010
2009/2156/P & 2009/2158/L	Internal and external alterations to include the installation of an extract duct flue at rear of site from ground floor level to roof level to education facility (Class D1)	GRANTED 28/07/2009
2009/2161/PL	Internal alterations to include the installation of a disabled chair lift, widening of the existing opening between rooms at second floor level and installation of acoustic flooring within dance hall on first floor level of educational facility (Class D1)	GRANTED 21/07/2009
2008/2181/L	Internal alterations to a Grade II listed building associated with the relocation of offices to third floor and remodel of existing second floor offices into classrooms	GRANTED 30/7/2008
2005/5478/P & 2005/5479/L	Erection of a lift enclosure from basement to 2nd floor within a rear light well, associated works of alteration to the rear elevation of the building and ther re-opening of internal doors currently fixed shut between Nos. 42 and 43.	GRANTED 06/04/2006

Background /history of the site

Royal Female School of Art Foundation (RFSA)

- 2.2 The owner of the site and the Applicant for the purpose of the application is the Royal Female School of Art Foundation (RFSA).

- 2.3 The RFSA Foundation dates back to the middle of the nineteenth century with the founding of the Female School of Art in 1842. The school was established with the aim of educating young women in the arts and allowing them to gain “honourable and profitable employment”. The school was located in Gower Street for several years until 1860.
- 2.4 In 1860, the school successfully purchased the freehold for 42-42 Queen Square. As an official organisation funded by the Government, eventually it came under the control of the London County Council (LCC) in 1908 as an LCC Trade School for Girls and the art school was eventually subsumed into what is now Central Saint Martin’s College of Art and Design. The LCC took over the running of the assets of the charitable foundation linked to the Royal Female School of Art, which became known as the Royal Female School of Art Foundation (RFSA).
- 2.5 From 1908 the buildings previously occupied by the RFSA were then used for various purposes, until the Stanhope Institute occupied them through the Inner London Education Authority (ILEA), by this time the sole trustee of the RFSA.
- 2.6 In 1980 the ILEA dissolved the Stanhope Institute, occupiers of 42-43 Queen Square since the 1960’s. At that time the Mary Ward Centre was having to move from its home in Tavistock Place, so the ILEA (later the London Residuary Body) offered the Mary Ward Settlement the Queen Square building lease, which it has occupied from 1982 until finally moving premises in 2023.
- 2.7 The RFSA Foundation and its Trustees are custodians of the original school’s historic funds and assets. The Foundation continues to use the income from its long-held property asset at Queen Square to offer grants to students in Greater London. Its continuing mission is to widen access to the arts, by supporting those who might otherwise be unable to start or stay in further and higher education due to financial hardship, cultural barriers, physical or mental disability, or caring responsibilities.

The Mary Ward Centre

- 2.8 The Mary Ward Centre settlement originally began in 1890 as University Hall, located in Gordon Square. The centre was founded by Mary Ward CBE, a Victorian novelist and campaigner for better education for the poor but the original name of the institution was the Passmore Edwards Settlement, as it was part of the settlement movement, and was financed by John Passmore Edwards.
- 2.9 Now named the Mary Ward Centre, its home since the 1980’s has been Queen Square in Bloomsbury. Its original 1898 building - still named Mary Ward House - is located just off Tavistock Square and is considered to be one of the best Arts and Crafts buildings in London.
- 2.10 Over time the activities at the Settlement expanded to include fully equipped classrooms for children with disabilities, one of the first in England; pioneering the importance of play within children’s education. In 1920 Mary Ward died and the following year the Settlement was renamed as the Mary Ward Settlement in memory of her work. In addition to the educational centre, the organisation includes the Mary Ward Legal Centre.
- 2.11 In 2018 The Mary Ward Centre announced in a letter to students their plans to move to new premises in Stratford, East London. In the letter, students were told the organisation had purchased a new building in Queensway House on Stratford High Street, citing the need for specialist educational provision in East London, where demand for adult education is also higher. Their new building in Stratford will offer more space for more courses, better facilities, and better disability access, in a part of London that has great transport links for students.
- 2.12 The new building will provide the Mary Ward Centre with additional classrooms, specialist art, textiles, sculpture, ceramics and craft rooms, amongst others, that are much more generous in size than the ones in Queen Square. Another benefit of the move is that the Adult Education Centre and the Mary Ward Legal Centre

will once again share a home, which hasn't been possible since the Legal Centre moved out of 42 Queen Square in the mid 1990's. Their two Centres in Stratford and Blackfriars will now be home to a full range of Mary Ward Settlements work, with courses for adults, legal advice and community projects taking place at both.

- 2.13 The present lease at 42-43 Queen Square terminates at the end of July 2023, having been extended by a year to allow them to prepare their Stratford building for occupation in September. The property is held by the RFSA Foundation as an investment, to support the charity's grant-making function. Given the historic role they have played in the charity's history, and in the context of the RFSA's investment strategy, the optimum solution was to re-let the property.

Marketing

- 2.14 RFSA instructed Cluttons to advise on future options in late 2018. However, a combination of Mary Ward's desire to remain longer, the impact of Brexit and Covid, meant that the property was put on the market in November 2021. Two local factors impacted on demand for the property:

- i) Condition: Given the length of time the buildings have been used – intensively – for teaching, they need to be upgraded for most future re-letting. Given the scarce resources of the charity, this would need to be funded by the incoming tenant.
- ii) Use: The property is in educational use (Class F1), for which there is limited demand in the area. The main land use in and around Queen Square is medical, dominated by such institutions as Great Ormond Street Hospital, National Hospital for Neurology and Neurosurgery, UCL Institute of Cognitive Neuroscience, UCL Institute of Neurology, and the Royal London Hospital for Integrated Medicine.

- 2.15 The initial marketing campaign lasted from November 2021 to late 2022, seeking an occupational tenant. The campaign involved a full-page advert in the Estates Gazette, circulating details to over 1,200 commercial agents, individual responses to known requirements and listing on the Cluttons web site. During this period, what limited interest there was came from a variety of users, ranging from hotel, service offices, art gallery, medical and educational. In all there were a dozen inspections but no offers could be generated.

- 2.16 In November 2022 the building was re-marketed as a long leasehold disposal, with a geared ground rent. Over the next four months – by which time the property had been on the market for 15 months – only one offer was received, from Amethyst, which was subject to planning permission for a change of use to medical.

- 2.17 The charity does not want to hold an empty property. The application for change of use is made to establish the principle of the change of use only; this will fulfil the conditional nature of the deal with Amethyst, as well as providing a marketable alternative use, should the deal with Amethyst fail to be concluded.

Amethyst (QRSC Ltd)

- 2.18 Now QRSC Ltd proposes to lease the buildings from The Mary Ward Centre for 30 years, setting up a Radiotherapy Treatment Centre. This major investment by the company will complement facilities in nearby institutions and will establish a major state of the art cancer treatment centre in central London, by relocating from across the Square.

- 2.19 QRSC Ltd - the prospective tenant – is a UK trading company within the Amethyst Radiotherapy Group BV ("Amethyst") - a registered company in the Netherlands. It was founded in 2010 to deliver next generation (non-surgical) Oncology treatments to address the legacy demand and supply deficit (both quantitative and qualitative) across the international Cancer Care market. The group is now the largest provider of Radiotherapy (RT) services in Europe treating over 20,000 patients a year. Amethyst employs over 550 clinical and administrative staff across the Group.

- 2.20 Amethyst was one of the first operators to deploy cutting edge radiation techniques such as Intensity Modulated Radiotherapy (IMRT), Volumetric Modulated Arc Therapy (VMAT) and Image Guided Radiotherapy (IGRT) at a time when government systems across the world were typically still using old 3D conformal radiation technology. These new techniques deliver more precisely targeted radiation treatment to patients with vastly improved outcomes sparing less damage to healthy tissues and organs at risk.
- 2.21 Amethyst entered the UK healthcare market in March 2020 with the acquisition of two leading Radiosurgery Centres in London and Sheffield and operates a specialist Intracranial Stereotactic Radiosurgery Service for the treatment of inoperable brain tumours in adults, on behalf of University College Hospital's NHS Trust's (UCLH) National Hospital for Neurology and Neurosciences; a world-renowned clinical research, teaching and tertiary service Centre of Excellence, recently named one of the top three leading Neurosciences Centres in the world by Newsweek.
- 2.22 Amethyst also operates a paediatric brain tumour radiosurgery service in collaboration with Great Ormond Street Hospital for Children NHS Trust. Their collaboration with UCLH is one of only two such national Centres of Excellence approved by NHS England.
- 2.23 NHS patient activity currently accounts for +80% of Amethyst's UK patient throughput funded under long-term evergreen contracts with UCLH, Sheffield NHS and NHS England. Amethyst is now scaling up its UK Service Operations given the post Covid operating landscape where Cancer Care is one of the top UK health priorities.

3.0 Planning policy framework

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act and Section 70(2) of the Town and Country Planning Act 1990 (as amended) outline the requirement for planning applications to be determined in accordance with the development plan for an area unless material considerations indicate otherwise. This legal requirement is reiterated within the introduction of the National Planning Policy Framework (NPPF).
- 3.2 The adopted development plan for the site comprises of the following documents:
- Camden Local Plan (July 2017)
 - London Plan (March 2021)
- 3.3 The following documents are material considerations:
- NPPF (July 2021)
 - Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011)
- 3.4 The Draft proposed changes to the NPPF were published on 22 December 2022. The consultation, which closed on 2 March 2023, sought views on the proposed approach to updating national policy. In our view, at this stage it should only be given very limited weight.

4.0 Planning considerations

4.1 The main planning considerations include:

1. Land use
2. Heritage
3. Neighbour amenity
4. Transport
5. Sustainability

1. Land use

4.2 Local Plan Policy C2 (G) (Community Facilities) states existing community facilities should be retained unless one of the following tests are met:

- i. A replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users; or
- ii. The existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing.

4.3 Local Plan Policy E1(E) supports the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan.

4.4 Local Plan Policy E2 (Employment premises and sites) also states that the Council will encourage the provision of employment premises and sites in the borough and will protect premises or sites that are suitable for continued business use and premises that support the functioning of the Central Activities Zone (CAZ) or the local economy.

4.5 Camden's Local Plan defines community facilities as "a wide range of social infrastructure that provides a service to the community. This includes childcare, **education** (our emphasis), adult learning and training, **healthcare** (our emphasis), police stations, youth provision, libraries, public houses, community halls, places of worship and public toilets."

4.6 Both the existing (education) and proposed (healthcare) uses are therefore defined as community uses in the Local Plan. As such, the proposed change of use meets the first test of Local Plan Policy C2(G), as a healthcare facility is proposed to replace the existing education use, where the replacement use is a facility of a similar nature provided in order to meet the needs of its intended users.

4,7 As set out in the background/history of the site section of this report, the existing educational use (The Mary Ward Centre) is moving to Stratford where there is a greater need for specialist educational provision and where the demand for adult education is higher. Their new building in Stratford will offer more space for more courses, better facilities, and better disability access. As such the lease at 42-43 Queen Square is available and given the history of Amethyst and its current location at the National Hospital for Neurology and Neurosurgery on the other side of Queen Square, the occupation of the building by Amethyst is logical.

4.8 Additionally, Camden's Local Plan supports the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter. The Knowledge Quarter comprises the general area of King's Cross, Euston Road and Bloomsbury. Considering the proposed medical

use is situated in the Bloomsbury area, coupled with the highly accessible location of the site allowing for sustainable travel to the community facility, it is considered the site is suitable for a medical use.

- 4.9 The proposed change of use therefore replaces one community use with another, in an area which supports healthcare provision and the principal of the change of use is therefore considered to accord with Local Plan Policies C2, E1 and E2.

2. Heritage

- 4.10 Policy D2 (Heritage) of the Local Plan seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

- 4.11 No internal or external alterations are proposed as part of this application, which is for change of use only. As such there will be no physical impact upon the designated heritage assets and as such, the proposal would conserve both the listed building and Conservation Area. The Bloomsbury Conservation Area Appraisal and Management Strategy states that "hospital and medical uses dominate the square, which is active and busy with people throughout the day". As such, it is not considered that the change of use will impact upon the character of the Listed Building, which is already in a community use, or the wider Queen Square which is an area already characterised by medical uses.

- 4.12 Therefore, the proposal is considered to be in line with Local Plan Policy D2.

3. Neighbouring amenity

- 4.13 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours through ensuring that the amenity of communities, occupiers and neighbours is protected.

- 4.14 As there are no external alterations proposed, there will be no impact to neighbouring properties in terms of outlook, visual privacy and daylight and sunlight levels.

- 4.15 Given that the existing and proposed uses are of similar nature, it is considered that there will be no impact to noise levels. If anything, the proposed use will be less intensive than the use of the property as a school, where there will be fewer daily visitors and less members of staff.

- 4.16 It is considered that the proposal is in line with surrounding land uses and the application to change the use to Class E (medical) would not result in any adverse impact to neighbouring amenity and therefore complies with Local Plan Policy A1.

4. Transport

- 4.17 Local Plan Policies T1 (prioritising walking, cycling and public transport) and T2 (parking and car-free development) set out a clear strategy for managing the transport impacts of development which has a strong focus on designing schemes and taking measures which promote active travel and to ensure that where this is not possible that the emphasis is on using public transport rather than private motor vehicles.

- 4.18 The site situated in a highly accessible area with a PTAL rating 6b (best) with Russell Square Underground station located circa 5 minutes away on foot and Holborn Underground station located circa 7 minutes away on foot.

- 4.19 The site has no car parking and none is proposed as part of the change of use. Therefore, the proposal complies with the Council's policies for promoting the use of sustainable transport and mitigating against climate change.

- 4.20 There is currently no cycle parking on site. Staff and students currently use the cycle stands located to the north of the property on Queen Square. 9 long term and 15 short term cycle parking spaces are required for the proposed healthcare facility in line with the London Plan standards, which is based on the employment of 45 full time equivalent staff. The required cycle parking is proposed to be located in the vaults and offers a vast improvement to the existing situation, where there is none on site. It should also be noted however that the proposed change of use is far less intensive than the existing school use and in reality, visitors to the site would also likely utilise the cycle stands available on Queen Square.
- 4.21 The bin store is proposed in the same location as the existing bin store on site. As per the existing arrangements, waste would be stored in the building and then brought out to the bin for collection by Camden business waste services.
- 4.22 The proposed development is therefore considered to be in accordance with Policies T1 and T2 of the Local Plan and the London Plan minimum cycle parking standards.

5. Sustainability

- 4.23 Pursuant to Local Plan Policies CC1-CC5, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions.
- 4.24 Due to the listed nature of the building and as this application is for change of use only with no internal or external alterations proposed, no upgrades to the building's sustainability are proposed at this stage. Any future internal or external works which result from this change of use application will be subject to a separate planning/listed building consent application and a Sustainability Statement would be submitted at that stage.

5.0 Conclusions

- 5.1 This planning statement has been prepared in support of this application for planning permission for the proposed change of use at 42-43 Queen Square from education (Class F1) to a healthcare facility (Class E). This statement demonstrates that the proposal is in accordance with the relevant policies contained within the development plan.
- 5.2 No internal or external alterations are proposed to the building. This statement concludes that the proposed change of use will not impact upon the grade II listed building or wider conservation area, while also safeguarding the amenities of neighbouring properties. A policy compliant level of cycle parking spaces is also proposed, and the proposed change of use is considered to be a less intensive use of the listed building than the current educational use.
- 5.3 The Council is therefore respectfully requested to grant planning permission for the proposed change of use.