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| Delegated Report | | Analysis sheet | | Expiry Date: 21/03/2022 | |
| | | N/A | | Consultation Expiry Date: 17/04/2022 | |
| Officer | | | Application Number(s) | | |
| Ewan Campbell | | | 2023/0802/P | | |
| Application Address | | | Drawing Numbers | | |
| 1 Southampton Place London Camden WC1A 2DA | | | Please refer to draft decision notice | | |
| PO 3/4 | Area Team Signature | C&UD | Authorised Officer Signature | | |
| | | | | | |
| Proposal(s) | | | | | |
| Change of use from office (Class E (g) (i)) to education (Class F1 (a)). | | | | | |
| Recommendation(s): | | Refuse Planning Permission | | | |
| Application Type: | | Full Planning Permission | | | |
| Conditions or Reasons for Refusal: | | Refer to Draft Decision Notice | | | |
| Informatives: | | | | | |
| Consultations | | | | | |
| | | No. of responses | 00 | No. of objections | 00 |
| Neighbour Consultation | | A site notice was put up on 18/03/2022 and expired on the 11/04/2022. A press advert was put up on the 24/03/2022 and expired on 17/04/2022 No comments. | | | |
| Bloomsbury CAAC | | Bloomsbury CAAC have not commented to the proposal | | | |
| Site Description | | | | | |
| The Site comprises 1 Southampton Place, which is part of a terrace of townhouses featured with darkened multicoloured stock brick with a stone band at 1st floor level that date from circa 1758-1763. 1 Southampton Place achieves a height of up to 4 storeys. The property is currently vacant. The surrounding area comprises a range of uses including commercial, education, residential, retail, restaurants. Bloomsbury Square Garden and the British Museum is situated to the northwest of the Site. | | | | | |

Relevant History

2022/3747/A, 2022/3744/L, 2022/2141/P - The installation of 9 external LED surface mounted lighting fixtures and 7 polished brass signage plates at the entrances to 1 Southampton Place, 18-23 Southampton Place and 46-47 Bloomsbury Square (Decision Pending)

National Planning Policy Framework 2021

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development

Policy A4 Noise and Vibration

Policy D1 Design

Policy D2 Heritage

Policy E2 Employment Premises and sites

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and Car Free Development

Policy DM1 Delivery and Monitoring

Camden Planning Guidance (CPG)

Amenity CPG (January)

Design CPG (January 2021)

Employment site and business premises CPG (January 2021)

Transport (January 2021)

Bloomsbury Conservation Area Appraisal and Management Strategy 2011

Assessment

1. PROPOSAL

1.1. The applicant seeks planning consent for the following:

- 1.1.1. Conversion commercial office premise (Class E (g) (i)) into education use (Class E F1 (a))
- 1.1.2. There are no internal or external alterations and therefore Listed Building Consent is not required for this application.

2. CONSIDERATIONS

2.1. The material considerations for this application are as follows:

- 2.1.1. Change of Use
- 2.1.2. Design and Heritage
- 2.1.3. Amenity
- 2.1.4. Transport

3. ASSESSMENT

Change of use

- 3.1.1. Policy E2 is clear that the Council will resist the loss of a business use to a non-business use unless it has been thoroughly explored whether there is possibility for that use to continue. The Council will consider the suitability of the location for business use; whether the premises are in a reasonable condition to allow the use to continue; the range of unit sizes; and whether the business use is well related to nearby land uses (para. 5.37). Where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use.
- 3.1.2. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers (para. 5.39). The site is also located within the central London area and the Business Improvement District which aims to support cultural, research, scientific and media organisations. This represents a suitable location for space for large and small businesses.
- 3.1.3. The existing office space has a number of constraints such as: being within an older building which was not purpose built for this type of use, further constrained by it being a listed building therefore internal modification are unlikely to be acceptable; the office space is located over five floors of the building and it does not have a lift; there are various levels changes within each of the floors; and access to bathroom facilities do not meet modern standards. That said, smaller office spaces of this nature are often found to be well suited for small and medium sized enterprises.
- 3.1.4. The cover letter states that the site is 'currently vacant' but no proof has been provided that this is the case. As for the required 2 year marketing exercise, none has been provided or mentioned within the supporting information. Therefore this does not represent quality evidence to demonstrate the requirements of policy E2 and Camden Planning Guidance (CPG), have been satisfied. The application is not supported by any material evidence and therefore fails to comply with E2 and the employment and business premises CPG.
- 3.1.5. Because the application is not supported by any such evidence, it is not possible for the Council to determine if there is a realistic prospect of demand to use the site for an employment use. In the absence of this information, proposals would be contrary to policy

E2 and the Employment and business premises CPG. Therefore, it is considered that, in the absence of sufficient marketing evidence to the contrary, the accommodation remains suitable for employment use, in particular use by small and medium sized businesses, and the loss of such use would result in the loss of employment opportunities within the borough. As such, the current proposal cannot be supported.

Design and Heritage

3.1.6. Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

3.1.7. The site is Grade II* listed with the listing describing the building as

Shopping parade with offices, formerly flats, over, forming the south-east return to Sicilian Avenue (qv). 1906-10. By RJ Worley. For the Bedford Estate, altered C20. Red brick with white terracotta dressings and slate roof.

3.1.8. The proposal only includes the change of use of the building and therefore there are no internal or external works. Therefore the changes would not impact the setting and character of the listed building as well as preserving the character of the conservation area and therefore considered to comply with D1 and D2 of the Local Plan

Amenity

3.1.9. Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes privacy, outlook and implications on daylight and sunlight. This is supported by the CPG Amenity.

3.1.10. Again, because there are no external changes there will be no additional impact on outlook, privacy, overlooking and daylight.

3.1.11. Limited information has been provided in relation to the number of students or how the building will be used. However on balance, because the rooms are staying the same and there is no uplift in floor space, there would not be a significant increase in the intensification of the use in this location. This means that the noise impacts on nearby residents would be similar compared with the existing business use. In the event of approval details such as the hours of operation could also be controlled.

3.1.12. Therefore the proposal complies with policy A1 of the 2017 Camden Local Plan and the Amenity CPG.

Transport

3.1.13. Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measures are in place to ensure the Council meets their zero carbon targets.

3.1.14. Policy T2 limits the availability of parking in the borough and requires new

developments in the borough to be car free. This will be done through not issuing parking permits, resisting development of boundary treatments and using legal agreements to secure these actions. However, in this instance considering the limited scale of the development, the fact the existing use is not controlled as car-free and the nature of the use it would be unlikely that parking permits would be issued. This is because in order for a business to be issued a parking permit it must demonstrate an essential need for the viability of the business. This type of educational use would not demonstrate such a need. Therefore, it is not necessary to secure the development as car free through a S106 legal agreement.

3.1.15. The cover letter provides very limited information and therefore the nature of the educational use is unclear and it is not clear how the building will be used. However given the size of the unit the teaching capacity will be limited and therefore unlikely that travel to and from the site would result in a significant stress on nearby transport and parking infrastructure. Whilst the floor area would fall below the threshold of requiring a travel plan, in any forthcoming application the Council expects more details in relation to the operation of the site including amount of students, teachers and nature of use.

3.1.16. The proposal comply with policies A1, T1 and T2 of the 2017 Local Plan,

4. RECOMMENDATION

4.1. Refuse Planning Permission for the following reason:

4.1.1. The proposed development would result in the loss of employment floorspace which (without marketing evidence to the contrary) is considered to remain suitable for use. It would fail to support economic activity in Camden, particularly small and medium sized businesses and would result in the loss of employment opportunities within the Borough contrary to policy E2 (Employment premises and sites) of the Camden Local Plan 2017.