

Zerum Planning Limited Calls Landing Third Floor 36-38 The Calls Leeds LS2 7EW

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London Borough of Camden Council Planning Department 5 Pancras Square London N1C 4AG

20th June 2023

Dear Sir / Madam,

2<sup>ND</sup> FLOOR, COUNTY HOUSE, CONWAY MEWS, LONDON, W1T 6AA

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
FULL PLANNING APPLICATION FOR THE CHANGE OF USE FROM OFFICES (USE CLASS E(g)-i) TO AN EDUCATIONAL FACILITY (USE CLASS F1-a).

On behalf of the applicant, First Intuition Ltd, we hereby submit a planning application seeking the Change of Use from Offices (Use Class E(g-i) to an educational facility (Use Class F1-a) at the second floor of County House, County Mews, London. W1T 6AA. This Planning Application has been submitted via the Planning Portal (Ref: PP-120303336) and contains the following:

- Application form and fee of £494.20;
- This supporting technical and heritage impact letter prepared by Zerum; and,
- Site Location Plan; and,
- Existing and Proposed floor plans.

# The Applicant

The Applicant, First Institution, provide study services for aspiring accountants across the UK, facilitating individuals in obtaining accounting qualifications. First Intuition are an award-winning professional education provider with expert tutors and exceptional pass rates, offering online and classroom courses.

The Applicant opened its first study centre in 2007 and now operate 16 study centres across the UK, providing a variety of online study options to create a blend of programs to fit in with the most demanding of lives.

Over 10,000 students annually use First Intuition and achieve industry leading results.

## **Site Description**

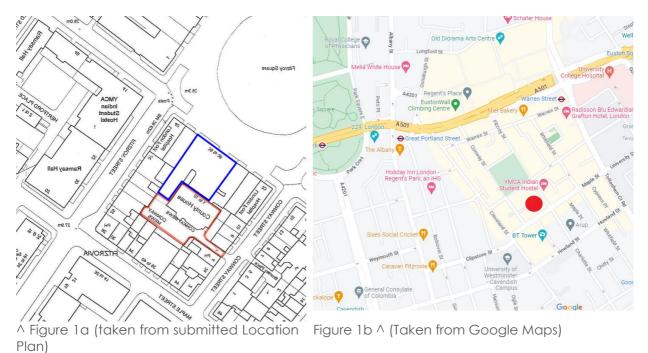
The application site is located within the administrative boundary of London Borough of Camden Council ('LBCC'). The application site comprises the second floor of County House, a 1960's office building, in Conway Mews



County House is a five-storey building located within an urban block formed by terraced buildings on Fitzroy Square, Conway Street, Maple Street and Fitzroy Street. The site is located immediately to the rear (south) of Boston House and is currently accessed via a narrow archway on the east side of Conway Street.

The basement, ground and first floors which have a total floorspace of 680.7 sqm are currently occupied by the applicant, First Intuition (Use Class F1-a). There are five car parking spaces and 18 cycle spaces provided within the site.

**Figure 1a** shows the site red line boundary (indicated with red line) and **Figure 1b** shows the site location within the wider context (marked by red dot).



The property is not listed but is located within the Fitzroy Square Conservation Area where the building is identified as making a neutral contribution (neither positive contributor or a detractor) to the character and appearance of the Conservation Area.

The property lies within Flood Zone 1, therefore has a low probability of flooding.

## **Planning History**

The most recent and relevant planning history at both the application site is set out within Table 1.1 below.

Application Ref	Description of Development	Address	Decision and Date
2020/2319/P	Change of use of basement, ground and first floors from accountancy school (Class F1) to office (Class E).		Withdraw 10-06-2020
2012/3913/P	Replacement of existing shopfront and addition of security roller shutters to jewellery shop (Class A1).		



2008/0556/P	Change of use from office (Class B1) to mixed use Class D1 (Non residential institution) at basement, ground and First floors and Class B1 (Office) on the second floor.	Granted 13- 02-2008
2007/4950/P	Change of use from office (Class B1) to non residential institution (Class D1) at basement to second floor levels.	 Withdrawn 21-12-2007

^ Table 1.1

## **Proposed Development**

This application seeks to the change the use of the 2<sup>nd</sup> floor of County House property from offices (Use Class E(g-i) to an educational facility (Use Class F1-a). This will enable First Intuition to expand as they currently operate on the lower ground, ground and 1<sup>st</sup> floors of County House, delivering specialised education in a high-quality classroom environment.

The proposed learning facility aims to target those wanting to obtain professional accounting qualifications, such as Chartered Institute of Management Accountants (CIMA).

No external alterations are proposed as part of this application. The client seeks to implement some internal alterations which involve inserting partition walls to create 2no. classrooms and 1no. break out area.

The number of car parking and cycle spaces are proposed to remain the same, given that they are not fully utilised.

## **Planning Policy**

## Adopted Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with an up-to-date Development Plan unless material planning considerations outweigh it.

For the purpose of this application, the adopted Development Plan for LBCC comprises:

- London Plan (2021): This is the spatial development strategy for London which sets out policies to ensure the delivery of the Mayor's vision and objectives.
- The Camden Local Plan (2017): This sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.
- Fitzrovia Area Action Plan (2014): This sets out the development strategy for Fitzrovia and the western part of Bloomsbury.

The London Plan (2021) Policies of relevance to this application include:

- Policy GG5: Growing a Good Economy
- Policy D1: London's Form, Character and Capacity for Growth
- Policy D14: Noise
- Policy \$1: Developing London's social infrastructure
- Policy S3: Education and childcare facilities
- Policy E1: Offices
- Policy E2: Providing Suitable Business Space



Policy HC1: Heritage Conservation and Growth

The following policies from the Camden Local Plan (2017) are also relevant to the application:

- Policy G1: Delivery and location of growth
- Policy C2: Community facilities
- Policy E1: Economic development
- Policy E2: Employment premises and sites
- Policy A1: Managing the impact of development
- Policy A4: Noise and vibration
- Policy D1: Design
- Policy D2: Heritage
- Policy CC1: Climate change mitigation
- Policy CC2: Adapting to climate change
- Policy CC4: Air quality
- Policy T1: Prioritising walking, cycling and public transport
- Policy T2: Parking and car-free development

## Material Considerations

The National Planning Policy Framework

In terms of material considerations, the National Planning Policy Framework ('NPPF') was published on 27<sup>th</sup> March 2012 and was recently updated in July 2021. It acts as a material consideration in the determination of this planning application.

The NPPF has a clear presumption in favour of sustainable development at its heart (para 11). The NPPF outlines that the primary objective of development management is to foster the delivery of sustainable development. Local planning authorities should look for solutions rather than problems, working pro-actively with applicants to secure developments that improve the economic, social and environmental conditions of an area. The relevant provisions of the NPPF are as follows.

Section 6 ('Building a strong, competitive economy') of the NPPF is applicable as it sets out how planning decisions should help create conditions in which businesses can invest, expand and adapt.

Section 8 ('Promoting healthy and safe communities') of the NPPF is applicable as paragraph 93 states that planning decisions should promote the provision of community facilities that serve local residents.

Section 9 ('Promoting sustainable transport') emphasises the need for development to be located close to public transport links to reduce reliance on cars.

Section 11 ('Making effective use of land') of the NPPF is also relevant as it seeks development to makes use of underutilised sites.

Section 16 (Conserving and enhancing the historic environment') sets out that planning applications affecting conservation areas, designated or non-designated heritage assets need to assess how the heritage asset will be affected.



Planning (Listed Buildings and Conservation Areas) Act 1990

Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and 72 (1): "...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

#### Camden Plan 2025

The Camden Plan 2025 seeks to make Camden a better borough- a place where everyone has a chance to succeed and where nobody gets left behind.

In terms of growth and access to job, The Camden Plan 2025 asserts that in 2025, growth should be strong and inclusive, and everyone should be able to access the work that is right for them.

It sets out that the council and others will need to work with local businesses and major organisations to understand what they need to continue to grow. One key aim set out is the need to make Camden the best place in London to do business, with the infrastructure that business needs to grow. Businesses and their employees should be part of our community and contribute to our vision for Camden in 2025.

## **Planning Assessment**

The key assessment is the consideration of the principle of the development and the extension of an educational use (Use Class F1-a) to the second floor in County House. The Camden Local Plan refers to community facilities as consisting of a wide range of social infrastructure including education, and adult learning and training facilities. The existing accountancy school (F1-a Use Class) at County House would therefore be considered a community use.

In this context, Local Plan policy C2(g) applies which states that the Council will ensure existing community facilities are retained unless either 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. The extension of the accountancy school to the second floor will ensure that First Intuition can continue to operate and improve the quality and quantity of training. As such the proposal is also considered to accord with London Plan Policies, as well as the provisions of section 8 of the NPPF.

The educational training and skills that the Applicant provides to individuals will support surrounding businesses in the long run as it will equip individuals with finance skills for future employment. Therefore, the proposed use is considered compatible and as such accords Policy E1 of the Camden Local Plan, Policy CG5 of the London Plan and Section 6 of the NPPF.

The unit lies within Camden Town and the hours of opening will be the same as the hours of opening of other existing businesses within County House, therefore not causing any disturbance outside normal 9:00 to 17:00 business hours. For this reason, the proposed change of use is considered to accord with Policies A1 and A4 of the Camden Local Plan and Policies G1 and DM14 of the London Plan (2021).

By granting this application, more members of the local community will have the opportunity to gain professional qualifications and further their skills within finance, enabling them to have increased prospect. It will open the door to jobs and careers in finance which will not only benefit the individuals but also the wider community. This will in turn have a host of long-term economic benefits, therefore meeting the aims of the Camden Plan 2025 and London Plan Policy CG1.



Moreover, the site is highly accessible to a range of public transport links including local bus route and the London Underground with a strong Public Transport Accessibility Rating (PTAL) rating of 6, therefore meeting Camden Local Policies T1 and T2, as well as Section 9 of the NPPF. Given that the site is highly accessible, prospective students will be expected to travel via public transport routes therefore it is not deemed that the proposal will have a detrimental impact on air quality and as such accords with Policy CC4 from the Camden Local Plan.

The proposal will ensure that an underutilised unit is brought back into use whilst also allowing a business to expand and grown. As such it is considered that the proposed change of Use accords with Policy E1 of the Camden Local Plan, Policy 4.1 of the London Plan and Section 11 of the NPPF.

The change of use of the second floor of County House proposes no external alterations or extensions to the building, and on the basis that the part of the existing building is already used as an educational facility (Use Class F1-a), the proposal would not significantly alter the way the building currently operates. As a result, the proposed change of use of this building will have no discernible impact on the character and appearance of the Conservation Area or the setting of surrounding listed properties. The proposals are in accordance with Policy HC1 from the London Plan and Section 16 of the NPPF.

Clearly, the proposals will bring a realm of both social and economic benefits, therefore representing sustainable development.

## **Summary**

This planning application seeks to change the use of the second floor of County House, Conway Mews from Offices (Use Class E(g-i) to an educational facility (Use Class F1-a) to enable the applicant to deliver further and higher education to students. The proposal will bring a host of social and economic benefits to the community, whilst bringing a vacant space back into use. The proposed change of use is therefore considered appropriate and acceptable in planning terms.

I trust that the above sets out the basis for the submission however if I can be of any further assistance then please do not hesitate to contact me.

Yours faithfully,

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Meghan Gleeson Planner