

11 April 2024
Savills Cover Letter



Planning Solutions Team
Planning and Regeneration
London Borough of Camden

John Dyke
E: @savills.com
DL: +44 (0) 7409 8895

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Sir / Madam

19 BEDFORD SQUARE, LONDON, WC1B 3HH

On behalf of the freeholder, Bedford Estates, I submit a planning application for Change of use from non-residential educational institution (F.1) to use as offices (Class E) and/or non-residential educational institution (Class F.1).

The application comprises:

- Application form
- Location and site plan
- Floorplans
- Schedule of interest.

1. 19 BEDFORD SQUARE AND PLANNING HISTORY

19 Bedford Square is a Grade 1 listed building and part of a symmetrical terrace of 16 houses forming the north side of the square. They were probably designed by either Thomas Leverton or Robert Palmer for the Bedford Estate between 1776 and 1781. Bedford Square also forms part of the Bloomsbury Conservation Area. In the Conservation Area Appraisal and Management Strategy adopted by the London Borough of Camden in April 2011, Bedford Square and its buildings are described as follows;

'This sub area [Bedford Square/Gower Street] is a virtually intact and exemplary piece of late 18th century town planning.

...

Dating from 1775, Bedford Square is one of the most significant and complete examples of a Georgian square in London. Its national importance is acknowledged by the Grade I listed status of all the townhouses fronting the square ...The square is the centre piece of the Bedford Estate's planned development which includes a series of interlinked streets and spaces and is a major focal point both along Gower Street and within the wider Bloomsbury area.'

The gardens within Bedford Square are a designated open space and included in English Heritage's Register of Parks and Gardens of Special Historic Interest in Greater London.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



The building is formed of three main storeys with a mansard/attic level above and a lower ground/basement level below to provide a total of five levels of accommodation.

Planning permission was granted to the New College of the Humanities in July 2012 for:

“Change of use from offices (Class B1a) to either use as offices (Class B1a) or a nonresidential educational institution (Class D1).” LBC Ref 2012/1522/P

The Informative said:

“You are advised that if implemented, the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the uses is taking place at the time.”

This enabled occupation by The New College of the Humanities who were the occupants until January 2022 i.e. before the 10 years had elapsed. It is therefore arguable whether the lawful use is now offices or educational but we presume that it's Class F.1.

The permission was subject to a s106 Agreement for a contribution to the provision of six on-street cycle spaces, we presume this was paid by the applicant.

Apart from permission for a number of minor works, the most recent decision was the listed building consent was granted in October 2022 for:

“Renovation and refurbishment of existing building to remove non-original additions, repair/refurbish the existing windows and doors; replacing and upgrading services throughout, replacement of the external condensers with new units to roof top level and infill extension to vacant undercroft at lower ground level beneath rear link extension.” LBC Ref 2022/1172/L

These works have been implemented.

Other permissions for dual office / education use have been granted at 32, 33, 38 and 39 Bedford Square.

2. THE APPLICATION

The application seeks change of use from non-residential educational institution (F.1) to use as offices (Class E) and/or non-residential educational institution (Class F.1).

This is, in effect, a repeat of the 2012 flexible planning permission for dual use. It follows the departure of the former Class F.1 occupant.

The application drawings include the refurbishment works of the 2022 listed building consent.

No further external or internal alterations to the building are proposed as part of this application. The existing layout of the building will also be retained which is suitable for both uses. Accordingly, listed building consent is not sought in tandem with this planning application.

3. ASSESSMENT

19 Bedford Square is within the broader Knowledge Quarter and Bloomsbury Campus Area.

The relevant current policies of the adopted Local Plan and those in the draft New Local Plan are a continuation of those which applied when planning permission was granted in 2012 for the dual use. The principal adopted policies relate to employment (Policy E2 Employment premises and sites) and education (Policy C2 Community

facilities) together with transport (Policy T1 Prioritising walking, cycling and public transport), heritage (Policy D2 Heritage) and amenity (Policy A1 Managing the impact of development).

Employment

The 2012 Officer's report explained that:

“Policy DP13 seeks to protect employment uses, but this is on the basis that they can be used flexibly for a range of employment uses. The applicants have stated that the building is unsuitable for other employment uses because it is grade 1 listed, cannot provide for servicing by larger vehicles, is not close to other industry and warehousing uses, in a mixed use area including residential and commercial uses, and could not provide a range of unit sizes for small businesses. The site therefore has few, if any, of the typical design features as outlined in paragraphs 13.3 and 13.4 of policy DP13 that would allow flexible employment use and it is unlikely that incorporating such features would be feasible in a building such as this. Furthermore, Policy CGPG states that the loss of B1(a) may be allowable for that older premises or buildings that were originally built as residential.”

The 2012 application did not include any evidence of a marketing exercise over at least two years because there was then a substantial availability in this area of alternative sites which provided significant amounts of modern office floor space. This applies equally now. The draft New Local Plan recognises in Policy IE2 that there may be a permanent shift towards greater working from home with employees attending the workplace less frequently. This will affect the demand for offices and this is reflected in the proposed reduction of the marketing period from two years to one year.

19 Bedford Square is a Grade 1 listed building originally built as a residential house and an additional factor is that it would not be appropriate to install features of more modern office accommodation.

The premises have been marketed since June 2022 by Edward Charles & Partners and Compton on behalf of The Bedford Estates and there has been interest from both educational and office (and medical) tenants but none has turned yet into a formal offer. This can be seen from the Schedule of Interest accompanying this application.

It should also be noted that the 2012 permission demonstrated that the potential employment from an educational use can be greater than offices so continuation of the former would not lead to any loss of job opportunities. Moreover, as then, a dual use protects employment use since the flexibility enables return to entirely office use without need to obtain further planning permission. There would be no permanent loss of office accommodation.

Accordingly, it is considered that the application continues to comply with the employment policies not only of the Local Plan but also the direction of travel of the draft New Local Plan.

Social and Community Uses

Education (Class F.1) is a Social and Community use supported by Policy C2 of the Local Plan and Policy SC2 of the draft New Local Plan. Policy

The site is in a highly accessible location close to Goodge Street and Tottenham Court Road tube stations within the Knowledge Quarter and the Bloomsbury Campus Area and therefore inherently suitable for continued education use.

Heritage

This proposal involves no physical alterations, either internally or externally, to the building. There will be no physical impact upon the building and therefore an application is not necessary for listed building consent.

Access, Sustainability and Amenity

The status of the building as a Grade I listed building is such that it would be difficult to introduce physical alterations in order to support improved sustainability without also causing significant harm to the heritage asset.

Since the application comprises only a change of use and no physical alteration, a formal assessment of sustainability is deemed inappropriate in this instance. The building will essentially continue to operate in its existing form.

In terms of accessibility, it is recognised that the building does not provide unimpeded access for users who are not fully physically able. However, given the significant heritage value of the building and its contribution to the appearance of both Bedford Square and the Bloomsbury Conservation Area more widely, it is considered that alterations to provide level access to the building would cause harm that is greater than the benefits that would accrue.

Given that there are no external alterations proposed, there would be adverse impact on neighbouring properties in terms of overlooking, loss of sunlight or daylight. No condition restricting the hours of operation was thought necessary with the 2012 permission and the same considerations apply equally today.

On this basis the application complies with the relevant policies relating to transport (Policy T1 Prioritising walking, cycling and public transport), heritage (Policy D2 Heritage) and amenity (Policy A1 Managing the impact of development).

4. CONCLUSION

The July 2012 dual use permission has expired and the former occupants, The New College of the Humanities has left. 19 Bedford Square is now vacant.

This application seeks effectively to renew the flexibility of either offices (Class E) and/or non-residential educational institution (Class F.1). No alterations are proposed so, as before, no application for listed building consent is submitted.

Similar policy considerations apply in the adopted Local Plan as before and the draft New Local Plan recognises that the changes in the offices market warrant a slight loosening of Policy E2.

A further flexible planning permission will safeguard the employment use of the building and maximise the prospects of early re-occupation of this Grade 1 listed building.

Yours faithfully

A handwritten signature in black ink, appearing to read "John M Dyke", with a long horizontal flourish extending to the right.

John M Dyke
Director

