

Planning Services
London Borough of Camden
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For the attention of Mr A. Kresovic

April 19th 2024



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4/4a Bloomsbury Square
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WC1A 2QP

Dear Sir/Madam,

Planning Application No: PP-12782407 (in respect of 5 Bloomsbury Place)

Camden Reference: 2024/0787/New

On behalf of our client, Aspect International Language Academies Limited (part of Kaplan International) we provide this letter as further information in support of an application for full planning consent for the change of Use from Class E to a Class F1(a) over 5 Bloomsbury Place, London, WC1B 3HH. This is to allow our client to occupy and utilise the building as a teaching centre, as with its previous occupancy since 1997.

The application itself comprises the following material, submitted via the Planning Portal (ref: PP-12782407).

- Completed application form;
- A Building Location Plan; and
- Floor Plans (showing proposed Education Spaces)
- A fee of £462.00 plus VAT has been paid.

Summary of Submission

- This submission is to be read in conjunction with the above mentioned planning application in respect of the proposed Use of 5 Bloomsbury Place as an education centre with an associated administration office staff quota of 17.6 (see below Appendix 2).
- This would constitute a continuation of the previous Education Use (F1a) for the building, albeit granted as a Personal Use to the Institute of European Studies, since March 1997 (ie over 25 years).
- The building reverted back to Office Use on their vacating the building in October 2022.
- We highlight that local travel facilities and local utilities fit the parameters required under Local Authority guidance for such a Use.
- We outline the background of the proposed occupier and their connection with the Bloomsbury area as well as their attachment to this location as a renowned education centre and most suited for their role as Language Course providers.
- We provide an account of the planning history for the building.
- We highlight references to the benefits of education uses in past and forthcoming (2017 and 2024) Local Plan guidelines for Camden as well as the benefits that a balanced and varied range of commercial occupier types provide for the Camden environment.
- We provide information on past planning history, the proposed usage for the building and provide a review of local market conditions in attached Appendices. We highlight that there has been a net loss of education organisations in the immediate area and whilst there is a high level of available office accommodation there is very little available Education Use accommodation currently.
- We discuss the heritage aspects of the building and that the proposed Use will be in keeping with London Plan and Local Plan Heritage requirements.
- In concluding we emphasise that we understand the current Camden Policy toward Office and Education spaces but ask that as this will not constitute a reduction of Office accommodation or employment over the last 25 years, the application and request for the Change to F1(a) Education be granted for 5 Bloomsbury Place.

Introduction

This letter provides a review of our application and proposed usage in the context of Camden's policies toward Office and Education Uses, market conditions and the building in question.

We respect Camden's planning policy and views toward change of Use from Office to Education Uses. With this application we ask that due to the recent history of the building as the London education centre for US based Institute for International Education of Students for over 25 years, that the Council consider it as appropriate for further education usage by our client, Aspect International Language Academies Ltd (a part of Kaplan International).

We provide details of the proposed usage, and insight into local markets activity and the commercial property market and a reasoning behind our view that such a concession should be provided.

Background

5 Bloomsbury Place is an end of terrace Georgian townhouse that dates from circa 1758-1763.

It comprises approx 3,600 sq. ft (net internal area) over basement, ground and three upper floors. It has a garden with separate independent access to Southampton Row for bicycle and pedestrian access.

The building is part of the Bedford Estates and is currently vacant having just been refurbished. The building plan submitted with the application provides a visual guide as to the boundary of the premises.

The former occupier of 25 years was US Overseas student course provider, the Institute of European Studies. They vacated in order to facilitate a significant expansion in 2022. They utilised the building as an education centre under a personal D1 Use (now Class F1) granted in 1997 (see Appendix 1 for a full planning review)

The surrounding area comprises a wide range of Uses including commercial, education, residential, retail and restaurants. Bloomsbury Square garden and the British Museum are situated closeby and to the south and west of the building respectively.

The building is a Grade II* listed building and falls within:

- The Bloomsbury Conservation Area
- The Knowledge Quarter

The building has a Public Transport Accessibility Level (PTAL) of 6b (highest achievable) (Source: Transport for London Website) with Russell Sq and Holborn underground stations closeby and multiple bus services available on Southampton Row. Proposed Occupier

The proposed occupier is a part of Kaplan International who have a teaching and administration centre on Southampton Place, off the south side of Bloomsbury Square and some 300 metres away.

Kaplan also have an ongoing search for office accommodation of approx. 3-3,500 sq ft to house an administration centre looking to relocate from current serviced offices in Hammersmith.

Should the acquisition of **5 Bloomsbury Place** be successful then options closeby, such as 4 Bloomsbury Place, Russell Square House and Synergy House Southampton Place will become very viable to accommodate this requirement.

The specific roll of Aspect International Language Academies Limited is to teach English Language to overseas based students above the age of 30.

School capacity is 210 split into am and pm shifts, so no more than 105 students in class at any given moment. 120 including staff and 150 including students who remain in the building for a short time after their class and while the other 105 have started their class. **90 is a reasonable average.**

The full time and part time **administration staff numbers** housed within the building provide an effective full time equivalent of 17.6 (see appendix 2).

Planning History

Planning history includes “the change of Use from Office (Class B1 Use Class) to an Education (Class D1 Use Class) (Application no: PS9704228R1), which was granted in 1997 as a personal Education Use for the benefit of the Institute of European Studies only.

Other recent planning history of the building includes the following:

- 2022/1635/P - Replacement of existing gas fired boiler with Air Source Heat Pumps including 3 external units within enclosure in rear garden.....(Camden Contact: Matthew Dempsey)
- 2023/4916/T - Consent for Works to Trees under a Tree Preservation Order. Jan 2024 (Contact Tom Little)

A complete planning history including alterations to the building pre-dating 1992 are outlined on the attached Appendix (1).

The Proposal

The full planning application seeks permission for:

“Change of Use from Class E to a Class F1(a) Education Use”.

The property is currently vacant. Aspect International Language Academies Ltd (a part of Kaplan International) have agreed terms (subject to planning) for a new 10 year lease with the Bedford Estates and to occupy the building once planning permission is granted.

No external or internal alterations are being proposed to the building as part of this application.

Reasoning for the Development

1. The principle of the change of Use from Class E to Class F1 is intended to accommodate Educational Use for the proposed future occupier (the applicant) Aspect International Language Academies Ltd / Kaplan International.
2. The proposed F1 Use is effectively a continuation of a 25 year education based occupancy by previous occupier, the Institute of European Studies who benefited from a personal D1 (now F1) Education Use since 1997 and vacated the premises for new larger accommodation in October 2022.
3. We appreciate the fundamental policy of retaining Office Use across the Borough. The Use returned to Class E after the vacation of the building by the former occupier.
4. Educational Uses are generally supported by local policy in both the current Local Plan as well as the draft new Local Plan of 2024. Specifically I refer to the following references:
 - i. Local Plan Policy E1 “Economic Development” encouraging the development of Camden’s education sectors and recognising **“the importance of other employment generating uses, such as education”**. This is specifically set out in supporting text Policy E1 paragraph 5.33 (page 172).
 - ii. Strategic Objective 4 “To strengthen Camden’s nationally important economy, in terms of business and employment, the knowledge economy, shopping and entertainment, culture, entertainment and tourism, and to secure benefits for local people to reduce inequalities in the borough through increased access to jobs, skills, training **and education opportunities**, ensuring nobody gets left behind”.
 - iii. To **“support the concentration of medical, educational, cultural and research institutions within Central London that for an integral part of the Knowledge Quarter”**
 - iv. 5.33 “The Council recognises that jobs are provided by many types of Uses within the borough, not just the based in offices or industrial premises. **These include shops and markets, hotels, and restaurants leisure, and tourism Uses as well as knowledge based sectors such as health and education.”**

5. Employment on site, in the form of teaching and administration positions, will still be retained (potentially enhanced) at the building. Please see accompanying note Appendix 2 “Statement of Education Use”. As a result, the proposal will not result in a net loss of employment over the previous occupation of 25 years. The estimated number of employed staff is provided.
6. London Plan Policy S3 “Education and childcare facilities” (page 208) further supports educational development appreciating its importance, especially within accessible locations, with good PTAL and access by walking and cycling, and next to green spaces where possible.
7. Bloomsbury Square Garden is also located directly south west of the building providing a green space for students and teachers to break from work.
8. The local Office / Education ratio would remain balanced with a significant number of local Bloomsbury Education users having closed or relocated recently (or are due to):
 - i) **Northeastern University** (formerly the New London College of the Humanities, Bedford Square) Approx 6,500 sq ft (building now returned to Office Use and vacant undergoing refurbishment).
 - ii) **New York University** (4,5,6 Bedford Square) (approx 18,000 sq ft) relocating away from Camden late 2024, leaving the buildings vacant.
 - iii) **IES Abroad** (Bloomsbury Place) (approx. 3,600 sq ft) (formerly within the building in question)
 - iv) **Delfin School** (Language) (formerly 4/5 Bloomsbury Square) (Closed in 2019 - approx. 4,500 sq ft building remains unrefurbished and vacant.
 - v) **The Language Gallery** - 18-19 Southampton Place, London, WC1A - Language school - approx. 6,800 sq ft building vacated in 2021 - currently vacant with a flexible Class E and Class F(a) Use.

Heritage

The building is a Grade II* listed property within Bloomsbury Conservation Area. This application does not propose external or internal alterations to the property. Due to the specific layout of the demise and the rooms provided within it, we considered an Educational Use as highly appropriate for this historic property without need for any adaptation or change.

As such, the proposal is in keeping with London Plan Policy HC1 "Heritage conservation and growth" and Local Plan Policy D1 "Design" and Policy D2 "Heritage", protecting and preserving the elements of historic significance.

Therefore, the property will continue to contribute positively to the historic character of the building and the surrounding conservation area. We consider the proposal to adhere to the legislative requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Conclusion

We appreciate and understand the local policy of protecting Class E office Uses across Camden.

We request that owing to the continuous Education Use of the building in question for over 25 years, and the appreciation of Education Use across Camden as an important factor in maintaining a balanced commercial environment that the proposed return of Use from Office (Class E) back to Education (Class F1) is considered appropriate usage for the building.

In doing so the building can meet the current needs of Aspect International Language Academies Ltd / Kaplan International who will continue to grow and thrive within Camden and more specifically the Bloomsbury area for the long term.

We stress that the proposal maintains or, indeed, possibly improves on former employment levels at the building whilst also protecting its historic significance.

We trust you have everything required to validate and determine this application.

Should you wish to discuss any aspect of this application, please do not hesitate to contact Michael Boardman of MB&A Commercial (contact details set out below).

Yours faithfully

MB&A Commercial

Contact: Michael Boardman Director

MB&A Commercial

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APPENDIX 1

Planning History - 5 Bloomsbury Place

Application Number	Site Address	Development Description	Status	Date Registered	Decision
2023/4916/T	Institute For International Education Of Students 5 Bloomsbury Place London WC1A 2QP	REAR GARDEN: 1 x Whitebeam (Sorbus aria) (T179) - Lift low canopy to southwest over rear garden, to clear tree in garden by 1m - 2m. Lift to approx. 5m above ground level., retaining furnishing growth to minimise visual impact. All final cuts to be at suitable growth points.	FINAL DECISION	20-11-2023	Approve Works (TPO)
2022/2246/L	5 Bloomsbury Place London WC1A 2QP	Replacement of existing gas fired boiler with Air Source Heat Pumps, including 3 external units and 19 corresponding internal units	FINAL DECISION	24-05-2022	Granted
2022/1635/P	5 Bloomsbury Place London WC1A 2QP	Replacement of existing gas fired boiler with Air Source Heat Pumps, including 3 external units within enclosure in rear garden (and 19 corresponding internal units - see associated Listed Building Consent application 2022/2246/L).	FINAL DECISION	24-05-2022	Granted
PS9704228R1	5 Bloomsbury Place, WC1	The change of use of the building from offices (B1 Use Class) to an educational use (D1 Use Class), as shown on drawing numbers 0084/SY/01-05 and 0082/WD/11C, 12D, 13C, 14C & 15C.	FINAL DECISION	09-06-1997	Grant Full Planning Permission (conds)
PS9704228	5 Bloomsbury Place, WC1	Change of use from offices (Class B1) to non-residential institution (Class D1) associated with the proposed occupation of this building by the Institute of European Studies. (Plans submitted).	FINAL DECISION	11-03-1997	Withdrawn Application-revision received
LS9604176R1	3, 4 & 5 Bloomsbury Place, WC1	Internal alterations in connection with the continued use of the premises as offices, as shown on drawing nos. 3788/01, 3788/02, 3788/03, 3788/04, 3788/05, 0082.WD.11A, 0082.WD.12A, 0082.WD.13A, 0082.WD.14A and 0082.WD.15A.	FINAL DECISION	22-11-1996	Grant L B Consent with Conditions
LS9604176	3, 4 & 5 Bloomsbury Place, WC1	Reinstatement of original layouts. (Plans submitted)	FINAL DECISION	12-11-1996	Withdrawn Application-revision received
9570339R1	1-5 Bloomsbury Place, WC1	Alterations to rear extensions, boundary walls and railings as shown on drawing numbers 92.353/AS(O)01B, AD(O)/101A, 120B, 121, 122, 123, 124A, 125, 126 and 15628:D113/010A.	FINAL DECISION	04-03-1996	Grant L B Consent with Conditions
9501895R1	1-5 Bloomsbury Place, WC1	Alterations to rear extensions, boundary walls and railings as shown on drawing numbers 92.353/AS(O)01B, AD(O)/101A, 120B, 121, 122, 123, 124A, 125, 126 and 15628:D113/010A.	FINAL DECISION	04-03-1996	Grant Full Planning Permission (conds)
9570339	1-5 Bloomsbury Place WC1	Demolition of garden wall and gable wall and rebuilding to match existing (Plans submitted)	FINAL DECISION	08-11-1995	Withdrawn Application-revision received

Appendix 2

Statement of Education Use and Proposed Occupancy Levels

1. Staff levels
 - 8 Full time staff
 - 12 Part time staff
 - Total Full Time Equivalent estimated at 17.6
2. Student Faculty Numbers
 - School capacity is 210 spilt into am and pm shifts, so no more than 105 students in class at any given moment.
 - 120 including staff and 150 including students who remain in the building for a short time after their class and while the other 105 have started their class. **90 is a reasonable average.**
3. Opening Hours
 - It is anticipated that the property will be used for education purposes between the hours of 8.00 am and 18.00 pm Monday to Friday.
4. Anticipated Student Age Group
 - Students attending this facility will be over the age of 30.
5. Smoking Policy
 - Students and staff are not allowed to smoke and will not be permitted to loiter immediately in front of the building.
6. Transport Policy
 - Bloomsbury Place is a two way thoroughfare off Southampton Row.
 - Russell Square (Piccadilly Line) and Holborn underground (Central and Piccadilly Lines) stations are closeby.
 - The building has a Public Transport Accessibility Level (PTAL) of 6b (highest achievable).
 - With the wide range of public access/ transport and no onsite parking facilities student and faculty members will use public transport to and from the building.
 - It is perceived that a high proportion of attending students will journey by bus and underground to the building.
7. Impact on surrounding area
 - There is no change of circumstance with the surrounding area from the previous occupancy which was similar to that proposed.
 - There is little residential occupancy closeby with only 1 Bloomsbury Place being a residential building on the terrace. There are a few residential units on Bloomsbury Square itself. The impact of the proposed occupancy of 5 Bloomsbury Place is deemed minimal, if anything at all, particularly in comparison to the previous occupation.

Prepared and submitted by:

Michael Boardman

MB&A Commercial

Appendix 3

Local Market Conditions and recent Education availability and activity levels

Immediate location

- 5 Bloomsbury Place is an end of terrace Georgian building that fronts onto Southampton Row and Bloomsbury Place.
- Opposite the building to the south is Victoria House comprising approx 300,000 sq ft of “office, laboratory and amenity space” which is currently under refurbishment and being marketed. It is available from Autumn 2024.
- The building to the north (67/69 Southampton Row) is occupied by Spink the Auctioneers
- The immediate neighbouring building (4 Bloomsbury Place) is an office, vacant and offered to the market for assignment or subletting of approx. 4,500 sq ft.
- The adjacent two buildings (2 and 3 Bloomsbury Place) are both serviced office providers offering small office suites to let.
- 1 Bloomsbury Place is a residential building which has a mix of vacant and occupied flats. We consider this building to be remote from 5 Bloomsbury Place. As a result, and in the context of a central London building located on the corner of two busy thoroughfares, that the impact of a continued Education Use on local residential occupiers to be zero, or minimal at worst.

General Bloomsbury Market (source: Agents Society Database)

Within the postcode of WC1 there are currently:

- Approx. 1,550,000 sq. ft office space available to let
- Approx. 110,500 sq. ft office space within small self contained buildings (1,000 - 10,000 sq ft)
- Approx. 224,000 sq. ft office space offered as large self contained buildings (10,000 - 85,000 sq ft)
- Approx. 1,420,000 sq. ft office space offered as floor plates.
- This includes the 300,000 sq ft under refurbishment at Victoria House, Bloomsbury Square immediately to the south of 5 Bloomsbury Place.
- To our knowledge only one available space is offered with an existing F1 teaching space consent (18 Southampton Place).

Education User Conditions within Bloomsbury

Owing to the presence within Bloomsbury of some of the most prominent and influential education organisations of the world, the location has an immediate appeal to education based occupiers.

Whilst there is a significant presence of education based organisations, some of who are expanding, there appears to be a recent erosion of numbers due to relocations away from Bloomsbury brought about by a lack of opportunity to secure appropriate premises within which to operate.

Recent activity has included the following relocations away from the area

- viii) New York University based on 4,5, and 6 Bedford Square totalling approx. 18,000 sq ft in total relocation away from Camden in order to expand.
- ix) Northeastern University (formerly the New London College of the Humanities, Bedford Square) Approx 6,500 sq ft (building now returned to Office use and vacant after refurbishment).
- x) IES Abroad (Bloomsbury Place) (approx. 3,600 sq ft) (formerly within the building in question)
- xi) Delfin School (Language) (formerly 4/5 Bloomsbury Square) (Closed in 2019 - approx. 4,500 sq ft building remains unrefurbished and vacant
- xii) all having closed or relocated (or committed to do so) recently.

Acquisitions have included:

- i) West Dean College KLC School of Design leased Dilke House Mallet Street, approx. 12,625 sq ft existing Education Use (2023)
- ii) Architects Association leased 1/2 Montague Street off the British Museum (agreed 2021) approx. 8,000 sq ft.