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24 January 2025

Dear Ms Smith

**50-51 Russell Square, WC1B 4JP (Ref: 2023/5470/P) and
39, 42, 43 Store Street, WC1E 7DB (Ref: 2024/2299/P)
Revised Community Infrastructure Levy Form 1**

On behalf of our client, The Bedford Estates Bloomsbury Ltd, we are instructed to submit a revised Community Infrastructure Levy (CIL) Form 1 relating to two connected Planning Applications within the London Borough of Camden ('LB Camden') at:

- 50-51 Russell Square, WC1B 4JB (Ref: 2023/5470/P); and
- 39, 42 & 43 Store Street, WC1E 7DB (Ref: 2024/2299/P).

Bedford Estates are the Applicants for both Planning Applications.

We are submitting a revised CIL Form 1 to replace two CIL Forms which have already been submitted to LB Camden as part of two Planning Application submissions to develop both sites.

The CIL Forms to be replaced are:

- CIL Form 1 relating to 50-51 Russell Square – This form is undated but was issued to LB Camden on 22 December 2023; and
- CIL Form 1 relating to 39, 42 & 43 Store Street – dated 10 December 2024.

The revised CIL Form 1 dated 23 January 2025 which is submitted with this letter will supersede the two previously submitted CIL Forms referred to above. The revised CIL Form 1 also corrects some typos which were present in the previous forms.

In this letter we set out the rationale for replacing the two CIL Forms (for each site) with one CIL which covers both sites so that the CIL contributions reflect the development across both the connected sites.

Background

The Planning Applications

We understand that LB Camden has agreed a resolution to grant consent subject to the signing of the Section 106 Agreement for the refurbishment and extension of 50-51 Russell Square as offices.

The Description of Development (Ref: 2023/5470/P) is as follows:

‘Deep refurbishment of existing building including new facades; erection of replacement roof extension with terrace to rear; reopening of lightwell to front and reconfiguration of entrance area; demolition two storey outrigger and replacement with three storeys plus plant enclosure; single storey rear infill extension to existing car park with terrace above; erection of full height stair rear core extension.’

We understand that LB Camden has agreed a resolution to grant consent subject to the signing of the Section 106 Agreement for use of the upper levels of 39, 42 and 43 Store Street. The Description of Development (Ref: 2024/2299/P) is as follows:

‘Change of use of first to third floors from office (Class E) to residential (Class C3) and reconfiguration of existing residential floorspace to provide 5 residential units (uplift of 4); associated installation of ASHPs at roof level.’

These two Planning Applications are linked by two draft Section 106 Legal Agreements to ensure that the Store Street site provides the off-site residential accommodation which is required to be provided as a result of the extension of the office use at 50-51 Russell Square to accord with the requirements of Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes (Camden Local Plan 2017).

Community Infrastructure Levy and Treatment of Floorspace

We consider that the two sites should be combined and treated as one site for the purposes of calculating CIL.

The Government states that:

‘The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals and other health and social care facilities, park improvements, green spaces and leisure centres.’

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The CIL in development (over 100 sqm) goes towards the cost of infrastructure projects such as educational facilities, transport improvements, medical facilities etc.

In the case of the connected redevelopment of the two sites at 50-51 Russell Square and 39, 42 & 43 Store Street, Store Street was developed because of the requirements of Policy H2 to provide residential floorspace as a result of the increase in office floorspace at Russell Square.

We have assessed the Existing and Proposed Floorspace figures extensively with Garnett Architecture and from our assessment, the two developments resulted in the following changes to the floorspace within the buildings:

- There will be an increase in office floorspace of 399 sqm GIA at 50-51 Russell Square
- There will be a decrease in office floorspace of 276.4 sqm GIA at 39, 42 & 43 Store Street
- There will be an increase in residential floorspace of 272 sqm GIA at 39, 42 & 43 Store Street

We have excluded a negligible increase in retail floorspace at ground floor within 43 Store Street as part of the CIL floorspace calculations. Reference to existing and proposed retail floorspace is excluded from the attached replacement CIL Form 1.

Summary of GIA

Land Use	Existing Floorspace (sqm GIA)	Proposed Floorspace (sqm GIA)	Net Additional Floorspace (sqm GIA)
Office	2054.4	2168	122.6
Residential	129	400.8	271.8

If the Council treats the two sites as one site for CIL purposes, then CIL will be calculated on the basis of the net increase in office floorspace as a result of the Russell Street development after taking into account the decrease in office floorspace at Store Street. This results in a net increase in office floorspace of 122.6 sqm as a result of the proposals.

Using the figure of 122.6 sqm as the net addition in office floorspace, will then reflect the true impact of the developments on the Borough. As a result of this increase in office at Russell Square but a loss in office floorspace at Store Street, CIL will be generated accordingly to fund the relevant infrastructure projects.

In addition, CIL will also be charged on the increase in residential floorspace (which was previously office floorspace which will be lost) at Store Street. And so, the previous office floorspace at Store Street which will now become residential floorspace will also be liable for CIL. And again, the money generated from this increase in residential floorspace will also go towards the costs of the relevant infrastructure projects.

Summary

In summary, treating both sites as one site for CIL purposes in this way means that the actual net increase in floorspace for both office use and for residential use results in CIL being properly charged based on the true impact from the connected developments on the Borough and London.

Material Submitted with this Letter

Please find submitted with this letter a revised CIL Form to replace the forms previously submitted in relation to the Planning Applications at Russell Square (Ref: 2023/5470/P) and Store Street (Ref: 2024/2299/P).

If you, or your CIL team, have any questions relating to this letter or the revised CIL Form 1 please do not hesitate to contact Rory Joyce (07771 898315) or Kate Espezel (07779 149287).

Yours sincerely

A handwritten signature in black ink that reads "Rory Joyce". The signature is written in a cursive style with a horizontal line underneath the name.

Rory Joyce
Principal
Brunel Planning

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