



[REDACTED]

16th February 2025

2025/0056/P

Henry Yeung
London Borough of Camden
5 Pancras Square
London
N1C 4AG

OBJECTION to proposals at 37 Great Russell Street: part change of use from Class E to residential / short let.

Dear Mr Yeung,

The Bloomsbury CAAC strongly objects to this application.

Change of use from commercial to residential uses is contrary to both the development plan (Local Plan Policy E2) and the Bloomsbury CA Management Strategy, and causes harm to the special character of the conservation area.

There are specific circumstances under which change of use may be justified under the development plan. Paragraph 5.39 of the Local Plan states that when considering change of use from employment to a non-employment use:

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 combination of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.'

Paragraph 5.37 states:

When assessing proposals that involve the loss of a business use to a non-business use, we will consider whether there is potential for that use to continue. We will take into account various factors including:

- *The suitability of the location for any business use.*
- *Whether the premises are in a reasonable condition to allow the use to continue.*
- *The range of unit sizes it provides, particularly suitability for small business; and*
- *Whether the business use is well related to nearby land uses.*

The site is located in a thriving commercial district on one of the busiest streets in the UK, receiving approximately 16,000 visitors per day on average (these are the British Museum visitor numbers). The business use is well related to nearby land uses, is suitable for small business, and exceptionally suitable for general business use.

It is therefore somewhat difficult to suggest that there is no potential for business use to continue on this site.

There are a number of letters submitted in evidence attempting to justify that business use is no longer viable on the site. The evidence suggests the property has only been marketed as office space when there are several other uses within Class E (shops, cafés etc) and Sui Generis (services etc) that have not been explored and are clearly viable alternatives given the longstanding success of several such businesses on the street and in the area.

Furthermore, the proposed plans provide very poor Class E space at ground floor, below the threshold necessary for a functioning shop, café, or service use, and smaller than necessary for a useful office space, which will further frustrate the use of this land for business.

We therefore object to this application. In planning terms, the proper use for this property is for business (both by the development plan and conservation policy). The full range of alternative business uses and layouts have not been explored on this site. The site is somewhat exceptionally located for business use and any arguments to the contrary should not be accepted.

Bloomsbury Conservation Areas
Advisory Committee