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Savills Cover Letter (AutoRecovered)



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Dear Sir / Madam

## **21 BEDFORD SQUARE, LONDON, WC1B 3HH**

On behalf of the freeholder, Bedford Estates, I submit a planning application for change of use from offices (Class E) 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
- Marketing Report.

### **1. 21 BEDFORD SQUARE AND PLANNING HISTORY**

21 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.

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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.

The planning history is limited to a number of permissions for minor internal works.

Planning permission for dual office / education use was granted on 12 March 2025 at 19 Bedford Square.

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 offices (Class E) to use as offices (Class E) and/or non-residential educational institution (Class F.1).

No 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**

21 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 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**

21 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 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 affects the demand for offices and this is reflected in the proposed reduction of the marketing period from two years to one year.

The property has been formally vacant since July 2022 and actively marketed since then for its lawful use by joint agents, Compton & Edward Charles & Partners, nearly three years. The Marketing Report sets out in a schedule that the property has been viewed 23 times by a variety of potential occupiers together with the outcome. There have been no formal offers and the Report concludes that:

*“given the limited demand and challenges in securing a suitable tenant, we believe that allowing dual office and educational use will enhance the property’s appeal and provide a greater opportunity for its productive use.”*

It is also relevant that the potential employment from an educational use can be greater than offices. This was acknowledged by the Council when granting permission for the New College of the Humanities at 19 Bedford Square in 2012. 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.

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 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.”

Accordingly, it is considered that the application complies 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**

21 Bedford Square has been vacant since July 2022 despite extensive marketing efforts.

This application seeks 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 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 dark ink, appearing to read "John M Dyke", with a long, sweeping horizontal line extending to the right.

John M Dyke  
Director