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Your ref

Dear Sirs

**22 Upper Woburn Place, London WC1H 0TB: Planning Application for Alternative Use of the Ground and Lower Ground Floor as either offices (Class B1) or education (Class D1)**

**1. Introduction**

On behalf of our client, Moreland Majestic Limited, please find enclosed a planning application for the alternative use of the ground and lower ground floors of 22 Upper Woburn Place as either offices (Class B1) or education (Class D1).

In support of the planning application we enclose:

- A planning application form, Certificate B and Agricultural Holdings Certificate, duly signed (the original and 3 copies);
- A location plan at 1:1250 (4 copies);
- The existing floor plans for the ground and lower ground floors at 1:100 (drawing nos. WP/01 and WP/02) (4 copies);
- The proposed floor plans for the ground and lower ground floors for D1 use at 1:100 (drawing nos. WP/05 and WP/06A) (4 copies);
- Photographs of the site (4 copies);
- Planning Application Additional Information Requirement Form for CIL (4 copies); and
- A cheque for £385 made payable to the London Borough of Camden, for the planning application fee.

We note that as the application is for a change of use there is no requirement for a Design and Access Statement.



## **2. Background**

The ground and lower ground floors of 22 Upper Woburn Place have been vacant since 24 April 2013. The applicants are seeking alternative use of the premises for either B1 use or D1 use, to allow for flexibility in leasing the premises. There are no external alterations proposed...

## **3. The Site**

Number 22 Upper Woburn Place is located on the west side of Upper Woburn Place, between Endsleigh Court to the north; and Woburn House to the south. The property is generally between eight and ten storeys in height, with a single storey element to the rear. The two lower floors were previously in use for offices, but are currently vacant. The ground floor comprises 331 sqm (gia) and the lower ground floor 479 sqm (gia). The upper floors of 22 Upper Woburn Place are in residential use. Photographs of the property are attached. Number 22 Upper Woburn Place is located within the Central London Area of the London Borough of Camden and within the Bloomsbury Conservation Area

Immediately to the east of the property is Tavistock House; whilst to the south is Tavistock Square, a designated open space. The area comprises a mix of offices, hotels (including the Hilton London Euston Hotel at nos. 17-18 Upper Woburn Place; the Ambassadors Hotel at no. 12; the County Hotel at nos. 7-11; and the Tavistock Hotel on Tavistock Square), residential, institutional and other uses. There are a number of education based uses in the immediate area, including the extensive University College London campus centred around Gower Street and student accommodation at Passfield Hall and Connaught Gardens.

The site has excellent public transport accessibility and a PTAL of 6b and is located within a few minutes walk from Euston Station (rail, underground and bus services) and less than ten minutes from King's Cross (rail and underground) and St. Pancras (international rail services). In addition, Russell Square is located approximately 0.5 km to the south east (underground). Bus routes 168, 91, 59 and 68 run along Upper Woburn Place. Numerous bus services operate from Euston Station including routes 10, 30, 73, 205, 18, 59, 390, 476, 253 and 91.

## **4. Planning History**

A review of the London Borough of Camden's online planning register has not identified any recent planning permissions for the ground and upper ground floors at 22 Upper Woburn Place. The only planning permissions relating to the property are for the erection of the lower ground and ground floor lift extension at the rear of the property, granted on 9 October 1987 (ref. PL/8701005); and a retrospective application for three air conditioning units on the rear wall at first floor level in connection with the existing offices, Class B1.

We note that there have been other examples of planning permissions granted for a change of use from B1 to D1 in Upper Woburn Place, one involving the alternative use of the building for B1/D1 at 14 Upper Woburn Place, as detailed below.

Central House, 14 Upper Woburn Place (ref. 2010/3891/P): Planning permission was granted on 21 October 2010 for the alternative use of the building as either offices (Class B1) or higher educational use (Class D1); and for external alterations including the erection of renewable energy panels and replacement plan equipment at roof level. The proposal was for 5,039 sqm of B1 or D1



use for University College London in order to provide teaching and office space and to accommodate expanding departments.

Third Floor, 16 Upper Woburn Place (ref. 2010/2064/P): Planning permission was granted on 1 September 2010 for the change of use of the third floor from office (Class B1) to non-residential institution (Class D1). The proposal was on behalf of a private college, with a high proportion of foreign students.

16 Upper Woburn Place (ref. 2007/2336): Planning permission was granted on 23 July 2008 for the change of use of the basement from ancillary office (Class B1) space to a student centre (Class D2). The proposal was for the use of 423 sqm of the basement as a student centre which would operate from 8am to 11pm, Monday to Sunday, including a restaurant, study and library area.

### **5. Proposed Change of use at 22 Upper Woburn Place**

The applicant is proposing the dual use of the floorspace (for ongoing B1 use and D1 use). The justification for the dual use is in order to maximise the prospects of the accommodation being occupied as soon as possible.

As noted above, the first option is to retain the ground and lower ground floors as B1 use, as existing.

In relation to the proposed change of use to D1, the premises would provide a self-contained college facility. The ground/lower ground floors have a separate access from Upper Woburn Place, and are separated from the upper residential floors. The proposed use for education purposes involves some internal reorganisation of space with internal partitioning, but will not impact on the external appearance of the building.

At ground floor level, the property currently comprises an entrance area and seven rooms of varying size, as shown on drawing no. WP/01. These have previously been used as offices and meeting rooms. There is in addition a lift accessed from the entrance area, which serves the lower ground floor. It is proposed to partition the main room to provide a reception area, administrative office, two training rooms and a seminar room, as shown on drawing no. WP/05. The other rooms would be retained as existing, but utilised as training and seminar rooms and as an office for the principal.

At lower ground level, the current layout comprises a series of offices of varying sizes, including one very large office space at the rear of the building (east side), three toilet areas, a small kitchen and a store, as shown on drawing no. WP/02. The general layout of the rooms in the western part of the building would be retained in their existing layout, but would be utilised for training and seminar rooms and as an administration office for the language school. One of the existing toilets would be altered to provide a separate disabled toilet. The eastern part of the building, would be subdivided to create four additional training rooms at this level. The proposed layout is shown on drawing no. WP/06A.

There is an existing parking courtyard to the west of the building which contains three parking spaces for use by the lower ground/ground floors of no. 22 Upper Woburn Place. These would be retained as existing. The store area below the exit ramp could be utilised for cycle storage if required and could incorporate eight cycle spaces, in accordance with the Council's requirement for



4 staff and 4 student cycle spaces (on the basis of the requirement for 1 staff parking space and 1 visitor space per 250sqm, as set out in Appendix 2 of the Camden Development Policies DPD). Due to the highly accessible location of the site, staff and students would travel to the site by public transport.

## **6. Planning Policy Context**

The National Planning Policy Framework (NPPF), published on 27 March 2012, sets out the Government's planning policies for England and replaces all previous PPGs/PPSs. It states that the purpose of the planning system is 'to contribute to the achievement of sustainable development' (paragraph 6). Paragraph 7 sets out the three dimensions of sustainable development; 'economic' in contributing to a strong and competitive economy; 'social' in supporting strong communities and providing the supply of housing required for present and future generations; and 'environmental' in protecting and enhancing the environment.

The development plan for the site is the London Plan (2011), The Camden Core Strategy (2010) and Development Management Policies (2010). Further guidance is provided by Camden Planning Guidance. Key policies of relevance to the proposed development are considered below.

The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) notes at paragraph 4.21 that the decline in the desirability of Bloomsbury as a residential area, along with the construction of fashionable villa developments to the north and west, such as Belsize Park and St John's Wood led to an increase in non-residential uses taking over formerly residential dwellings for office space during the 19<sup>th</sup> Century, including University College and a number of educational uses around Queen's Square. The advent of the railway also encouraged hotel and office redevelopments to the area. Major developments during the first half of the 20<sup>th</sup> Century were largely associated with the expansion of the University of London in the area between Gower Street and Russell Square and offices, hotels and shops along the main arterial routes. The expansion of the university and other education uses has continued up to the present day. The Bloomsbury Conservation Area Management Strategy recognises at paragraph 5.5 that uses have changed over time, including expansion of the university into the former terraces and into offices and the change of use from residential to hotel and hostel use. In consequence the existing area around the application site is mixed in character.

## **7. The Case of the Proposed Change of Use**

The applicant is seeking planning permission for the alternative use of the building as either offices (B1) or education (D1). In relation to the retained offices use, there is no requirement for planning permission or conservation area consent, as this is the existing lawful use and there are no external alterations proposed to the building.

### **(i) Change of use to Education Use/ D1 use**

Policy 3.18: Education Facilities of the London Plan (2011) states at point (A) that the Mayor will support the provision of further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater education choice. Point (C) notes that development proposals which enhance education and skills provision, including change of use to education purposes, will be supported. Point (H) of Policy 3.18 states that "*Boroughs should*



*support and maintain London's international reputation as a centre of excellence in higher education".*

Paragraph 10.4 of the Camden Core Strategy also states that the Council will work with higher education and further education colleges and universities, community and voluntary sector to ensure that suitable services and facilities for education and training are provided.

The area in which 22 Upper Woburn Place is located is recognised in the Camden Core Strategy as being an area suitable for higher education uses. Paragraph 10.7 of Camden's Core Strategy notes that higher and further education facilities are clustered in Camden's Central London Area, particularly in Bloomsbury and Fitzrovia, and that the Council recognises the importance of the higher and further education sector in Camden. Core Strategy Policy CS10: Supporting community facilities and services states at (b) that the Council will support the higher education sector in Camden and balance its requirements with those of other sectors and the local community.

Paragraph 10.7 of the Core Strategy notes that while generally supporting the expansion of higher education use in the Borough, the Council recognises that in areas where such uses already have an extensive presence they can have a harmful impact and in consequence the Council will assess applications for such uses against the criteria set out in Policy CS10b: Supporting community facilities and services, which states:

*"In assessing applications for higher education use, the Council will ensure that such developments are sensitive to their surroundings, take into account the cumulative impact on the balance and mix of uses in the area, protect residential uses, the local environment and the amenity of, and services for, the residential community and other users of the area and their future needs".*

It is considered that the area around no. 22 Upper Woburn Place is characterised by a mix of commercial, hotel, retail, residential and other uses, which is compatible with additional D1 uses. As the site has excellent public transport links there will be no traffic implications. The proposed change of use to D1 is therefore considered to accord with Policy CS10b.

**(ii) Loss of employment (B1 floorspace),**

Policy DP13: Employment premises and sites of Camden's Development Management Policies seeks to protect business uses where there is potential for that use to continue. However, Policy DP13 does cite specific cases where a change of use will be allowed, i.e.

- (a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and*
- (b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for a similar or alternative business use has been fully explored over an appropriate period of time".*

In relation to (a), the premises are considered outdated for office use without internal improvements. Moreover, there is a good supply of office accommodation in the immediate area. Paragraph 8.6 of Camden's Core Strategy recognises that 444,000 sqm of new office space has been granted planning permission at King's Cross and that there will be further large scale office development in Euston, where the Council envisages in the region of 70,000 square metres of





business floorspace being provided in the second half of the Core Strategy period, i.e. up to 2025. Paragraph 8.8 of the Core Strategy suggests that this provision, along with other new provision in the growth areas of Holborn and Tottenham Court Road can meet projected demand.

We note also that Policy CS8: Promoting a successful and inclusive Camden economy states at (f) that the Council will recognise the importance of other employment generating uses, including education in relation to securing a strong economy in Camden. The change of use to D1 would create employment opportunities for the borough.

In regard to (b) paragraph 13.5 of the Camden Development Policies states that where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must also submit evidence of a thorough marketing exercise. The property should be marketed at realistic prices, include a consideration of alternative business use and layouts and marketing strategies.

The ground and lower ground floors of number 22 Upper Woburn Place have been marketed for lease or sale since 14 February 2013. The marketing particulars were circulated on two occasions in March and June 2013 to 500 Central London agents to place the property fully on the market. During June and July 2013 two direct mail campaigns were implemented to office tenants. The first one was a mailing of property details to all office tenants employing between 20 and 75 personnel and within 10 minutes walking distance of the property and details were sent to 470 companies. The second was an email campaign contacting some 6,539 companies in Central London postal districts, employing between 20 and 75 people. The two mailing campaigns resulted in responses from four companies.

Eleven inspections of the property by potential leases/buyers have taken place between 26 February and 2 August 2013. Of the eleven companies who have viewed the property, three expressed concerns over the standard of the accommodation and the need for upgrading work. Two expressed interest in the use of the floorspace for D1 purposes.

It is therefore considered that the proposed use of the property for education use is appropriate, given:

- the unsuitability of the premises for modern occupational requirements;
- a lack of demand for the premises for B1 use despite extensive marketing over the past six months;
- the existing good supply of modern and second hand office accommodation in King's Cross and Euston;
- the scope to make use of the premises to provide alternative employment opportunities, i.e. associated with a D1 use;
- the unsuitability of the accommodation for alternative business use such as warehousing or light industry due to its central location and limited parking and loading/unloading area with difficult access;
- the mixed nature of the immediate area, which includes a number of educational uses; and



- the proximity of the site to good transport links.

## 8. Other Considerations

There are no external changes proposed to the property and there will therefore be no impact on the conservation area.

The proposed use of the premises for training purposes will depend on the occupier but would most likely be between 8.30am and 8.30pm, Monday to Friday. Given the largely commercial nature of surrounding buildings, which include a number of hotels, it is not considered that the proposed use will impact on the existing character and residential amenity of the area.

In terms of accessibility, a separate access is provided to the ground floor/lower ground floor of no. 22 Upper Woburn Place, with lift access to the lower ground floor. There are no proposed changes to the pedestrian or vehicular access to the property. There is level access into the property from Upper Woburn Place.

The ground and lower ground floors of the property have use of three parking spaces at lower ground level, which are accessed via the basement car park. Exit is via a ramp up to Upper Woburn Place. Use of these parking spaces will be strictly managed by any future occupier. Existing servicing arrangements will be maintained. There is scope to provide cycle parking spaces in the existing external store areas at lower ground level, as detailed above.

## 9. Conclusion

In conclusion, it is considered that the proposed change of use from B1 to D1 would make good use of the existing accommodation, which is considered outdated for commercial office accommodation, particularly in view of the existing and future supply of modern office accommodation in the King's Cross and Euston area; and would provide an alternative use to the existing B1 use. The proposed D1 use is compatible with the mixed use of the surrounding area and will bring new jobs into the area. We therefore request that planning permission be granted for the alternative use of the premises for B1 or D1 use.

Please do not hesitate to contact me should you require any further information or clarification.

Yours faithfully

A handwritten signature in black ink that reads 'Frances Young'.

**Frances Young**  
Senior Planner

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