

**Planning Statement**  
**New Premier House, 150 Southampton Row, London WC1B 5AL**  
**21 November 2012**

**1. Introduction**

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- 1.1 This Planning Statement is submitted by TJAC ('the Applicant') with the planning application for a part change of use to student accommodation ('the Application') at New Premier House, 150 Southampton Row, London WC1B 5AL (the Property). This Statement sets out a description of the Property's history, the site and surroundings, the proposals themselves and the relevant national and local planning policies.

**2. The Property and Surrounding Area**

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**2.1 The Property:**

- (a) The Property is known as New Premier House and is situated on the eastern side of Southampton Row in the Bloomsbury Conservation Area. Southampton Row is a major thoroughfare extending south to the junction of High Holborn and Kingsway and north to Russell Square.
- (b) 150 Southampton Row was constructed in the early 20th century for use as a boarding house where local authors lived and worked. It was built with a grand Victorian ornate facade of Portland stone. Whilst the façade, the turrets with copper capped roofs and chimney pots remain from the original construction, a large portion of the rear of the building was rebuilt after the Second World War.
- (c) After the building was re-constructed, its use was residential and listed on Camden rating records at that time as containing 26 residential flats. The building remained in residential use until the early to mid-1980s when it was converted from residential to office use.
- (d) The Property is arranged over a lower ground, ground and seven further floors, and currently provides approximately 3,170 square metres ('sq. m') of mixed use retail, restaurant and office accommodation.
- (e) The existing ground and lower ground floors are approximately 1,086 sq. m in size, which constitutes approximately a third of the total building floorspace. These floors are divided into four units which are used for two restaurants and two shops, all with entrances at street level on Southampton Row. The retail

units extend onto the pavement and the restaurants have external seating and canopies, together which provides an attractive, active frontage. The Application does not affect these existing uses which will continue as previously.

- (f) The existing upper floors have a net floor area of approximately 2,089 sq. m in total and are configured into front and rear units, separated by the central core. The central core contains stairs and a lift that is flanked on either side by internal light wells which effectively divide the Property into two. In the 1980s the lift was enclosed for fire protection by a metal panel system, further dividing the front and rear portions of the building.

## 2.2 Surrounding Area

- (a) The Property is situated in a busy, thriving area of London, which is well known as being a home to a variety of academic, cultural and healthcare institutions.
- (b) The immediate surroundings of the development include Russell Square, Guilford Street and Theobalds Road. The area is characterised by a mix of uses, typical of central London. There are many hotels, educational institutions and retail establishments. The area attracts many visitors from overseas and the rest of the United Kingdom for business and pleasure.
- (c) The front of the Property faces Southampton Row and the rear of the Property has tiered external terraces, facing Queen Square gardens.

## 3. The Proposals

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### 3.1 The Applicant:

- (a) The Applicant is an established construction management firm with over three decades of experience creating commercial, cultural and residential facilities in Europe and North America.
- (b) The Applicant has a proven track record of creating quality student accommodation and has previously completed two developments of student accommodation in the London Borough of Camden. Set out below are further details of these projects:

(c) 74-76 Guilford Street:

The Applicant redeveloped this historic property which was listed on the Council's 'At Risk' register by converting them into high quality student accommodation. The renovations included the provision of en-suite living quarters for 118 students. The Applicant worked closely with the Council's preservation officer to reinvigorate a building that was beginning to collapse and fall into the street. The project was successfully completed and has planning references 2010/0885/P and 2010/0910/L.

(d) Byron Court in Mecklenburgh Square:

The Applicant redeveloped Byron Court in Mecklenburgh Square, which was already primarily used for the provision of student accommodation and had to take into account ten existing long term residential tenants who wished to remain in occupation during the entire renovation project. The Applicant worked closely with the Council to develop new accessible entrance without damage to the historic fabric of the building.

### 3.2 The Planning Proposals:

The Application is to change the use of part of the Property from its existing office use to use as student accommodation flats. The development is described as a "*Change of use of upper floors (1st - 7th) from office use (Class B1) to provide 154 bedrooms for use as student accommodation (Sui Generis), involving connection and utilisation of existing structures at roof level to create new eighth floor, installation of plant and solar panels at eighth floor level, and provision of associated communal areas at basement level and communal rear garden at ground floor level for student use.*"

### 3.3 CATS College London:

- (a) The Property will be used only for students of CATS College London, which is part of the Cambridge Education Group (CEG). CEG has existed since 1952 and became the first private institution to deliver University foundation courses in the United Kingdom in 1985. CATS College London is located at 43-45 Bloomsbury Square, London WC1A 2RA.
- (b) CATS College London students attend a minimum of two terms per year, being the Autumn/Winter term (September to December) and Spring Term (January to April). The students are in full time attendance and require full time accommodation for a minimum of 34 weeks (238 days) per year. In

addition, as many as 90% the students attend one of the two additional Summer terms (May to June or July to August) for a further eight weeks.

- (c) Students that attend CATS College London range in age from 15 to 19 and are British and International students. International students are required to obtain a Tier 4 visa which is a restrictive student visa. Students are enrolled in a strict academic curriculum that enables them to achieve academic targets which then allow them to enter directly into a partner University programme.
- (d) The university partners include Cambridge University, Lancaster University, York University, Coventry University, Sunderland University, London University (Birkbeck, Goldsmiths, Queen Mary, Royal Holloway and Royal Veterinary), the London School of Economics, the University of the Arts, London, Kingston University and Imperial College. Many of these institutions are in Camden or the surrounding areas.
- (e) CATS College London has approximately 250 students per academic year in attendance at its teaching campus in Bloomsbury, Camden. CATS College London currently uses student accommodation just outside of Camden, at Caledonian Road. However, this accommodation is more than two underground stops away from the academic centre and the space is shared in part by university-age students. CATS College London has deemed this accommodation to be unacceptable in the long term as CATS College London students are younger and a potential for conflicting or competing interests with the older students exists. In addition, CATS College London is concerned for the general health and safety of their students and even with full supervision, CATS College London prefers exclusive residential accommodation for its students separate from the university level students.
- (f) CATS College London has agreed to a long-term lease of the Property in order to allow it to provide continuing safe and proper housing for its students. The application will provide long-term solution to providing accommodation specifically for the Camden based students studying and living in Camden. The Applicant is content for any planning permission granted for the use as student accommodation to be exclusive to the proposed tenant, CATS College London.
- (g) CEG and CATS College London are not only concerned with the excellence of their academic programmes, but they are also committed to providing first class accommodation which is safe, affordable, age appropriate and located near their academic centre. CATS College London and CEG take great pride

in stating that their approach to teaching and learning has been called 'exemplary' by recent government inspectors.

### 3.4 A highly managed environment:

- (a) The overall aim of CATS Colleges is to provide a rigorous high quality education by encouraging all students to realise their potential, while fostering independence and maturity. A Student Management Plan accompanies the Application which sets out these standards and is to be followed by staff and students.
- (b) The following programme is the typical weekly schedule throughout the a term:

#### Monday to Friday

(i)	Breakfast at academic centre	7:30 to 8:30 am
(ii)	Attend classes and lunch break	9:00 to 4:30 pm
(iii)	Evening meal at academic centre	5:00 to 6:00 pm
(iv)	Return to residential building - 25%	6:00 to 7:30 pm
(v)	Participate in scheduled activity - 50%	6:00 to 7:30 pm
(vi)	Group study at the academic centre - 25%	6:00 to 7:30 pm
(vii)	Return to residence	7:30 to 8:30 pm
(viii)	Required academic study time.	8:30 to 10:30 pm
(ix)	Mandatory lights out or in room study	10:30 pm

#### Saturday

(i)	Breakfast at academic centre	8:00 to 9:00 am
(ii)	Attend classes and lunch break	9:00 to 1:00 pm
(iii)	Participate in scheduled activity	1:00 to 6:00 pm
(iv)	Arrive at the academic centre for dinner	6:00 to 7:00 pm
(v)	Evening event	7:00 to 9:30 pm
(vi)	Return to residence	9:30 to 10:30 pm
(vii)	Mandatory lights out or in room	11:30 pm

#### Sunday

(i)	Academic centre open for brunch	10:00 to 2:00 pm
(ii)	Scheduled activities - 50%	12:00 to 5:00 pm
(iii)	Domestic time or study	12:00 to 5:00 pm
(iv)	Dinner at academic centre.	5:00 to 6:00 pm
(v)	Group study at academic centre - 50%.	6:00 to 8:30 pm
(vi)	Required academic study at residence - 50%	6:00 to 8:30 pm
(vii)	Lights out or in room study	10:30 pm

- (c) Students are supervised at all times day and night, inclusive of times to and from residence and academic building. Attendance is mandatory and all students must participate fully in academic and non-academic activities. Again, the Management Plan is able to demonstrate the requirement for full attendance and the activities of the students.

#### 4. Planning Considerations

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- 4.1 Set out below is a detailed consideration of the applicable planning policies to the Application.

*Principle of Land Use: Camden Development Policies 2010:*

**Policy DP13 – Employment premises and sites**

- 4.2 The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use;

- (i) The Property, as demonstrated in detail in the Commercial Viability Report which is submitted along with this Application, has for more than six years been subject to an extensive marketing and leasing programme. The Property was not viewed as an attractive or viable proposition by those seeking offices for their business. Even within in a market that has seen an increase in office lettings, the marketing of the Property did not achieve lettings. The Applicant submits that it can be concluded from this that the Property is not suitable for office use if no tenant wishes to use the Property for this purpose.

- b) AND there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

- 1. The Commercial Viability Report demonstrates that in addition to no demand for office use, the site has severe physical constraining features that restrict the ability to use the Property for similar or alternate business uses.

- 2. Other uses that may be permitted at the Property without the need to apply for planning permission are those within class B1c (light

industrial) or B8 (storage and warehousing). The features that render the Property unattractive to office users also apply to those who would wish to use the Property for an alternative business use. The physical constraints of the Property include for example, the entrance to the building, the limitations of the internal structural wall and columns and the central core that divides the building. These features reduce the flexibility of any occupier and so make the Property less attractive for any alternative business use. The size and nature of the current lifts and the access to the building would make the use of the Property for storage and warehousing difficult, for example. The central London location, the position upon the busy Southampton Row, and the lack of vehicular servicing are all limiting factors which could not easily be overcome..

4.3 At paragraph 13.3 of the Camden Development Policy, there is set out the considerations that the Council will take into account when considering whether there is the potential for the existing use to continue. These are addressed in turn:

- (i) Is the site located in or adjacent to the Industry Area, or other location suitable for large scale general industry and warehousing;  
The location of the Property is not within or adjacent to the Industry Area and precludes large scale general industry and warehousing, being in a busy, built up area of central London which would impede deliveries and distribution by road.
- (ii) Is the site located in a location suitable for a mix of uses including light industry and local distribution warehousing:  
Again, the Property is not located within an area suitable for this use and none of the surrounding area includes locations suitable for these uses.
- (iii) Is the site easily accessible to the Transport for London Road Network and/or London Distributor Roads:  
Southampton Row is a distributor road but, due to traffic flow and also the parking and waiting restrictions that are in place, frequent deliveries and on-street servicing by large vehicles would not be viable.
- (iv) Is the site, or will it be, accessible by means other than by car and has the potential to be serviced by rail or water:  
The Property is mainly accessible by foot or by public transport within the Central London area.

- (v) Does the site have adequate on-site vehicle space for servicing:  
The Property has no on-site space where vehicles could be serviced.
- (vi) Is the site well related to nearby land uses:  
The area is a mixed use area including offices, hotels and other central London uses, but not light industrial or warehousing uses.
- (vii) Is the site in a reasonable condition to allow the use to continue:  
The Property is unable to be let to continue the existing use, as evidenced by the Commercial Viability Report, due to the outdated condition of the Property and the physical constraints within it.
- (viii) Is the site near to other industry and warehousing, noise/vibration generating uses, pollution and hazards:  
No, there are no uses which cause the above near to the Property.
- (ix) Does the site provide a range of unit sizes, particularly suitable for small businesses (under 100sqm):  
The floorplates of each floor are above that threshold, but are not easily divided to suit or be attractive to small businesses due to the condition of the Property and the physical constraints referred to above.

4.4 The policy goes on to list design features that are considered attractive to enable flexible use, such as:

- (i) clear and flexible space with few supporting columns;
- (ii) adequate floor to ceiling heights;
- (iii) wide doors/corridors;
- (iv) loading facilities;
- (v) large amounts of natural light;
- (vi) availability of a range of unit sizes; and
- (vii) space for servicing by/parking of commercial vehicles.

In considering these desirable features against those that exist in the Property, it is clear that very few are in existence. There are adequate floor to ceiling heights and there is natural light however.

4.5 Paragraph 13.5 expands on the Council's requirement that all realistic prospects for use of the Property for employment use to have been exhausted. The Applicant is able



to demonstrate in the Commercial Viability Report which accompanies this Application that the property has been marketed for over two years, at a realistic price, and there has been consideration of alternative business uses and layouts where possible.

4.6 To return to policy DP 13, it then states that:

Where a change of use has been justified to the Council's satisfaction, we will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses.

- (i) The Application retains a third of the total building for existing retail and restaurant business uses with associated services. In consultation with the tenants of the existing businesses on the ground floor of the Property, the Application seeks to improve the physical constraints around their operations by the provision of office facilities for Pizza Hut, stopping rain water infiltrating each of the units and upgrading the fire alarm system that protects the whole building. These businesses are further discussed below.

4.7 The Camden Council Planning Guidance Note 5 (CPG 5) provides further guidance as to the loss of office use in Camden and we go on to consider this in light of the proposals.

4.8 Paragraph 6.2 states that 'We will protect existing employment sites and premises that meet the needs of businesses and employers. This guidance explains the circumstances when we will consider alternative uses for an employment site.'

4.9 Further, at paragraph 6.3, the SPG refers back to Camden's Core Strategy, which sets out the projected demand and planned supply of office floorspace in the borough. The paragraph states: 'We expect the supply of offices to meet the projected demand over the plan period and as a result we may allow a change from B1(a) offices to another use in some circumstances, such as older office premises or buildings that were originally built as residential dwellings. Our priority is for the replacement use to be permanent housing or community use. This approach is in line with policy DP13 Employment premises and sites in the Camden Development Policies'.

4.10 The Applicant submits that this guidance is directly applicable to the Application; the Property was reconstructed as residential flats after the Second World War. The proposed use as student accommodation meets the residential needs of an identified section of society in identifiable housing need.

4.11 Paragraph 6.4 sets out the considerations that we will take into account when assessing applications for a change of use from office to a non-business use, specifically:

- (i) the criteria listed in paragraph 13.3 of policy DP13 of the Camden Development Policies;  
This is discussed in detail above.
- (ii) the age of the premises. Some older premises may be more suitable to conversion;  
The Property is many years old as discussed in detail in this statement and requires conversion to become more suitable for other uses.
- (iii) whether the premises include features required by tenants seeking modern office accommodation;

As set out above and in the Commercial Viability Report, the Property is of some great age and unsuitable and unattractive to those tenants looking for modern office accommodation. It is not suited to flexible, open plan use that is required by tenants in the current market.

- (iv) the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;

The Property is not purpose built for office use and currently is of poor quality, requiring significant financial investment to bring it to a suitable standard for any type of retained business use.

- (v) whether there are existing tenants in the building, and whether these tenants intend to relocate;

The existing tenants are either coming to the end of their leases or are very happy to relocate to more suitable office premises within the area. We have letters from the tenants confirming this that are appended to the Commercial Viability Report.

- (vi) the location of the premises and evidence of demand for office space in this location;

The Commercial Viability Report sets out the lack of demand for office space; and

- (vii) whether the premises currently provide accommodation for small and medium businesses

The Property is not sufficiently flexible to meet the demands of businesses of this size and the Applicant submits that the Property cannot provide suitable accommodation of this nature.

#### **Policy DP9 - Student housing, bedsits and other housing with shared facilities**

4.12 In accordance with the specifics of DP9, the Council will support development of student housing provided that the development:

- (a) will not involve the loss of permanent self-contained homes:
  - (i) The Property is not currently used for residential use. Further, the potential residential use was rejected on viability grounds by more than 30 residential developers that viewed the Property as was evidenced in the Commercial Viability Report.
- (b) will not prejudice the supply of land for self-contained homes nor the Council's ability to meet its annual target:
  - (i) The Application will provide residential accommodation for students which are a group identified as being in housing need. This central London location, in immediate proximity to the existing educational cluster in Bloomsbury make it the ideal location to assist in meeting the housing needs of students within the Borough.
- (c) does not involve the loss of sites suitable for affordable, older or vulnerable people, particularly sites identified for such provision in the Camden Site Allocations Local Development Framework.
  - (i) Due to its central London location in the heart of busy commercial zone and physical site constraints the Property is not suitable for older or vulnerable tenants.
- (d) complies with HMO standards
  - (i) The proposal complies with HMO standards and have been designed to meet the specific operational needs of an educational institution.

- (e) will be accessible to public transportation, workplace, shops, services and community facilities
  - (i) The Property is within a very short, and safe, walking distance for students to the Camden based academic centre and is well served by many forms of public transport. Compared to current travel patterns of students attending the college who use public transport, the proposals will lead to a reduction in the use of public transport services at peak hours. Further, the Property is within a local area that has many shops, services and community facilities.
- (f) contributes to creating a mixed and inclusive community
  - (i) The Application enables the student population to become part of the local community, bringing cultural and economic benefits with it. However, as stated previously, as the college programme is highly structured and caters for all the needs of the students, there is little extra burden on public services. The local community is well served by the college, which is a large local employer. The scale of the proposal is appropriate for the size and scale of the Property and will not dominate the local area nor local community.
- (g) does not create an over-concentration of such a use in a local area or cause harm to residential amenity or the surrounding area
  - (i) Camden does not have a surfeit of student accommodation and the accommodation that exists is spread throughout the Borough rather than being focused on a specific area. The immediate surrounding area of the Property contains a mix of uses and the Application fits well into the area without creating an over-concentration of that specific use. As the students are highly supervised and younger than those attending higher education institutions, they will not bring with them the common difficulties associated with more traditional student populations.

#### 4.13 Student housing development should:

- (a) serve higher educational institutions based in Camden
  - (i) The proposed user is a Camden based educational institution that channels its students towards higher educational establishments. The college is a key partner of and has close links with Camden

based HEFCE institutions. While at CATs College London, students attend HEFCE institutions to further their studies. Post completion of the academics at CATs, a majority of the students (98%) go on to complete their full degree level courses with many students (30%) will continue attending HEFCE institutions in Camden.

(b) be located where the it is accessible to the institution it serves

(i) The Property is situated within a short, and safe, walking distance to the institution it serves. A key reason for the choice of the site is the concern for the safety of the specific student user group of younger students and so it is easily accessible to the college.

(c) include a range of flat layouts including flats with shared facilities

(i) The Application provides 39 flats of differing size and type, but all of a high standard of quality and design. The flats range in sizes from two to five bedrooms. The five bed units are specifically designed for those families that send two siblings to the college in order that they may live together. The Property provides additional study space, laundry facilities, an external garden and building wide Wi-Fi. The design and the layout has been approved and is tailored to the needs of the CATS College London. The variations in the size and configuration of the units allows CATS College London to have the option of accommodating students by gender, siblings and age group.

4.14 The Council will resist development that involves the net loss or self-containment of bedsit rooms or of other housing with shared facilities unless:

the development provides student housing that satisfies criteria d) to i) above

(i) The above demonstrates compliance and thus accords with Councils requirements.

## **5. Retained Retail / Restaurant Use and Local Economic Employment Benefit**

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5.1 The employment opportunities that will be derived from the Application include a full time building management and supervisory teams, building facilities teams and housekeeping team. In addition to a competitive wage, subsidised housing allowances will be provided to both the building managers. The employment within the Property associated with CAT's College London is 17 full time and part time positions.

- 5.2 In addition to these new employment opportunities, currently CATS College London employees approximately 70 full and part time positions directly related to the academic centre in Bloomsbury Square.
- 5.3 CATs College London and its students are strong community economic contributors and use local services, businesses and employ people from the local community.
- 5.4 The retail units on the ground floor and basement will be unaffected by the development and the occupiers have expressed support for the Application. It is fully expected that the tenants will remain in situ and continue to provide economic and employment benefits at a minimum of the same level and potentially increased with added demand from the new occupation. The proposed work also intends to support their business operations with added amenities that each have specifically stated would help better their operations and strengthen their viability.
- 5.5 Each of the four existing users, specifically Portland Food and Wine, Pizza Hut, IL Fornello, and Clockwork Pharmacy have provided a written statement of support of the redevelopment.
- 5.6 The reconstruction and refurbishment of the Property will also provide a substantial number of direct local construction jobs and indirect economic by the building materials that will be purchased from local suppliers.

## **6. Residential Amenity**

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### **6.1 The Property**

- (a) The proposed accommodation will provide 39 high quality self-contained flats each with kitchens, en-suite bathrooms and common space. The Property will have additional common rooms for student group study. The Property will have sophisticated sprinkler fire suppression systems and fire alarm systems, multiple means of egress, re-use collected rain water, highly energy efficient heating and lighting systems, solar panels for hot water, on site laundry facilities and IT facilities that link directly to the CEG's academic network.
- (b) Provision is also made for substantial bicycle storage, an on-site managed waste and recycling programme and a 24 hour, seven day a week reception presence. The building will meet BREEAM "Very Good" and exceed the minimum requirements for reduction in on-site carbon production.

- (c) The Property will be a completely car free development and students will be informed of this and not be permitted to keep private motor vehicles at any time. The Property is well served by local transport with several bus routes and six underground stations within 900 metres; the nearest being Russell Square which is approximately 200 metres away. Students will no longer be required to use the underground twice daily during peak hours to commute to and from the academic centre in Bloomsbury Square as they would be living within walking distance.
  
- (d) The Applicant notes the existence of the Camden Local Procurement Code and agrees to abide by it wherever possible. The Applicant understands the importance of maximising the opportunities available to local businesses in Camden from property development and is looking forward to working in partnership with the Camden Labour Market and Economy Service to fulfil the objectives of the code.
  
- (e) The Applicant has provided with this Application the outline of the rules that CEG uses within its student accommodations and the applicant has provided a Student Management Plan in cooperation with the intended user of the Property, being a plan setting out a package of measures to be adopted in the management of the student accommodation. The plan includes the following:
  - (i) the Code of Practice of the Management of Student Housing: The Universities UK Code of Practice of University Managed Student Accommodation;
  
  - (ii) mechanisms to ensure the occupation of the student accommodation is for a period of no less than one semester with provision for evidencing compliance with this requirement to the Council's reasonable satisfaction; and
  
  - (iii) provision of a designated community contact to enable any issues affecting local residents or businesses be dealt with in an efficient manner by creating a point of reference for local residents or businesses.

## 6.2 Daylight and sunlight

- (a) The existing windows in the building will remain unchanged. The daylight levels enjoyed by the Property will not be affected. Although the lower rooms facing into the light wells receive correspondingly lower daylight levels as recorded in the Daylight Report that accompanies this Application, it should be noted that bedrooms facing into light wells represent a typical feature of many mansion blocks in central London, and the Application is no different in this respect. This configuration occurs in the immediate vicinity and can be demonstrated by the adjacent Mercure and Bloomsbury Hotels on Southampton Row. Other multi floor student accommodation schemes previously approved elsewhere in Camden also have student rooms which look into equivalent light wells.

### **6.3 Noise and residential amenity**

- (a) The accompanying acoustic report to the Design and Access statement which accompanies this Application, demonstrates that the noise generated from the Application would comply with the criteria for both day and night time set by the Council. It should also be noted that the removal of the redundant equipment within the existing light wells will improve the amenity of adjoining properties.

### **6.4 Overlooking and privacy**

- (a) As the existing light well remains as is, save for removal of redundant plant and being given a general clean up, the adjoining neighbours on either side maintain the same level of privacy that they currently have. All the windows in the rooms have restricted openings, as do doors to the existing balconies, and so no students will be able to leave the Property by these. The students will have the benefit of a garden in the rear, and this is enclosed to provide privacy to both neighbours and students alike.

### **6.5 Outlook**

- (a) The overall renovations greatly improve the amenity of the residents of the adjoining Russell Mansions who look on to the light well on the south side of the building. The noise reduction stated above is a further amenity for these occupiers. The adjoining building on the left of the Property also has an improved outlook due to the removal of the debris and plastic roof covering currently in the garden. The properties off Queen Square currently view roof top equipment, which is replaced with a green roof and green landscaped



wall. Additional works include introducing paving and planting at the base of the light wells, and effective netting to eliminate the long-standing nuisance caused by pigeons, which have for many years been a nuisance to the residents of Russell Mansions. The students are provided with a quality outlook within the light wells, as well as to the front and rear of the property.

## **7. Conclusion**

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- 7.1 The Application is for a change of use of the Property for student accommodation and this Statement demonstrates that the Application will meet the needs of the students of CATS College London whilst respecting and enhancing a historic building in a busy and thriving area of central London. The Property is currently designated for office use, which this Statement has further demonstrated is an unviable one and one which does not enable the Property to be used to its full potential.
- 7.2 The Statement has demonstrated that, in accordance with Policy DP13, the Property is no longer suitable for its existing business use and that every possibility of retaining the existing use has been explored. The Applicant has identified the considerations the Council will take into account when considering the Application and addressed each of these in turn. Evidence for the assertions as to the lack of viability for the existing use is provided in the Commercial Viability Report.
- 7.3 The Applicant considers that Policy DP9 supports the Application as there is no loss of existing homes and the accommodation will enable the students to become part of the existing mix of local community and contribute to this in a cultural and economic way. The design of the proposals means that there will be no detrimental impact upon the existing amenity, and in fact the amenity of the neighbouring properties will be enhanced.

