

## Planning History

The Statutory planning register has been inspected in respect of this site. On 2 January 2001 a certificate of existing lawful use was granted for use of basement, ground, first, second and third floors for offices (Class B1). There have also been several applications for minor internal and external alterations to the building.

## Proposals

The proposal is for the change of use of 12 Bedford Square from offices (Class B1) to office and/or educational use (Class B1/D1). As stated above, flexible B1/D1 use is sought in order to retain flexibility for the Estate and attract more potential occupiers. No alterations to the building fabric are proposed as part of this application.

## Planning Policy

The statutory development plan consists of the London Plan, which was adopted on 22 July 2011, Camden Core Strategy, adopted in November 2011 and Camden Development Policies, also adopted in November 2011.

Consideration is also given to Camden Policy Guidance 5: Town Centres, Retail, and Employment.

The site is identified on the Core Strategy proposals map as being within the Central London Area and Bloomsbury Conservation Area.

## Considerations

### Office Use

Policy CS8 seeks to ensure a strong economy in Camden by b) safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; and f) recognising the importance of other employment generating uses, including education.

Policy DP13 states that: *"the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use 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; and*
- b) *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.*

*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.*

*When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses".*

Supporting paragraph 13.3 sets out the ways in which the council will assess proposals that involve the loss of a business use, whether there is potential for that use to continue the site:

- is located in or adjacent to the Industry Area;
- in a location suitable for a mix of uses including light industry;
- is easily accessible to the road network;
- accessible by means other than the car including rail or water;
- has adequate on-site vehicle space for servicing;
- well related to nearby land uses;
- is in a reasonable condition to allow the use to continue;
- is near other industry and warehousing; and
- provides a range of unit sizes.

This application is for a change of use from the existing B1a offices to a dual use of either offices and/or a D1 non-residential institution, specifically an educational use.

These proposals will not result in the permanent loss of the existing offices. They seek to obtain permission for flexible B1a/D1 use in order to respond to the current downturn in the office market by creating flexibility for the Estate to attract more potential occupiers. The proposals will enable the site to remain in active use in the interim until the office market improves.

The proposals have been assessed against Policy DP13 part a) below, having regard to the detailed criteria set out at supporting paragraph 13.3 for assessing the loss of business uses:

- The site is neither in nor adjacent to an industry area;
- This area of Central London and these premises cannot be considered as being suitable for large scale industry and warehousing.
- The central location of the site, Grade I listed status and location within Bloomsbury Conservation Area does not make the site suitable for local distribution warehousing or light industrial uses.
- The site is highly accessible but the above applies in respect of the level of access required in association with industrial/warehouse (B1(c), B2 and B8) uses.
- There is no parking on site and servicing currently takes place on street.
- There is no existing warehousing or industrial uses in the vicinity of the site.
- The office use could continue on site, as discussed above.
- The area is characterised by office, higher educational and residential uses. There are no industrial or warehousing uses, nor uses which lead to significant amounts of noise, vibration, pollution or hazards.



- Given the size and Grade I listed status of the building it would not be possible to subdivide the building without harming the significance of the designated heritage asset.

In relation to Policy DP13 part b), whilst there will be no permanent loss of office use, should the building be used for educational purposes; a certain amount of both full and part time employment would be generated by this use. However, as the Estate has no identified future tenant at this stage, it is not possible to provide a precise indication of staff numbers.

In respect of CPG5: Town Centres, Retail and Employment, paragraph 6.3 states that the Council 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.

Furthermore, paragraph 6.4 sets out the considerations that the Council will take into account when assessing applications for a change of use from office to a non-business use:

- *"..The age of the premises. Some older premises may be more suitable to conversion;"*  
*"whether the premises include features required by tenants seeking modern office accommodation;"*

*"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 building was not originally built for office use. Due to its Grade I listed status it would be very difficult to make any significant alterations to its fabric in order to make changes to the internal layout as required by most modern office occupiers. The property can be converted for an educational occupier without the requirement for any internal or external alterations. It should be noted that a number of permissions have been granted for other dual B1 and/or D1 uses for similar buildings in the area eg. 19 Bedford Square. The proposed use is clearly suitable for a building such as this.

- *"Whether there are existing tenants in the building, and whether these tenants intend to relocate;"*

The building is currently vacant. The previous tenants vacated over a year ago.

- *"The location of the premises and evidence of demand for office space in this location; and"*

The Bloomsbury area is characterised by higher education and academic uses. There is also a number of existing office premises on the square so there is no shortage of supply in the immediate vicinity. These uses make a significant contribution to both the local character and economy. A change of use at this site would therefore make a positive contribution to the distinctive character of this part of the borough.

The existing office unit has been marketed for several months and the Estate has experienced no interest.

- *"Whether the premises currently provide accommodation for small and medium businesses."*



The site has in the past been utilised by a single tenant and will continue to be used as such. Given that the building has only one central core and is Grade I listed, it is not possible to subdivide the building without harming the significance of this designated heritage asset. The building is therefore better utilised in its current form as a single unit.

### Educational Use

Policy CS10 relates to supporting community facilities and services. Part b) 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"* and Part d): *"providing a range of other community facilities to support Camden's growing population."*

Development Policy DP15 states that *"new community and leisure uses must be:*

- a) close or accessible to the community they serve;*
- b) accessible by a range of transport modes, in particular walking, cycling and public transport*
- c) located in the Central London Area or in the Camden Town Centres..... if they are expected to attract larger numbers of visitors".*

In addition to the above DP15 states: *"new community facilities must be provided in buildings which are flexible and sites to maximise the shared use of premises"*.

The proposals seek a dual B1/D1 use. The site can accommodate a small scale educational institution, which is likely to be a higher education use, which is:

1. Close to and accessible to the community it will serve being situated in an area characterised by higher education and academic uses.
2. Highly accessible by a range of transport modes including public transport (bus, tube), cycling and walking.
3. Located in the Central London area however given the size of the application site it is unlikely to attract a large number of visitors.

The impact of the proposed use on the surroundings will be similar to that of the office use. The only buildings in residential use in the vicinity of the site are to the rear of the site on Gower Mews. However, given that the only entrance is from Bedford Square the building's operations will be unlikely to have any material impact upon the amenity of these properties and no staff or students will need to enter Gower Mews. In addition, the operating hours of an educational use will be similar to that of an office use.

The vast majority of buildings on Bedford Square are in office use, and there are a number of eminent educational institutions in the vicinity. Therefore the change of use of the building to office and/or educational use would be in keeping with the character of the area.

### Conservation

The National Planning Policy Framework (NPPF) was adopted in March 2012. The document requires that local planning authorities set out in their local plan: *"a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk*



*through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance."* (Paragraph 126)

Furthermore, paragraph 131 states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of the heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 132 requires that when considering impact on the significance of the heritage asset, great weight should be given to the conservation of the asset. The more important the asset the greater the weight should be. Substantial harm to or loss of grade I and II\* buildings should be wholly exceptional. Under paragraph 134, however, where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In respect of Camden's Core Strategy, part i) of Policy CS9 states that the council will: "...preserve and enhance the area's historic environment."

Development Policy DP25 stipulates that the Council will only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building.

The NPPF applies substantial weight to the conservation of heritage assets by ensuring that they are kept in viable use consistent with their conservation and acknowledges that heritage assets should contribute to the economic vitality of local areas. In this regard the proposed change of use from offices to dual office and/or non-residential institution use will ensure that the building is attractive to a wide range of potential tenants and either use will make a positive contribution to the local economy and/or local community.

These proposals will have no physical impact upon the building and as such will fully protect the heritage value of both the Conservation Area and listed terrace. Given this, there is clearly no conflict between the heritage asset and the use proposed, and as such a clear protection of the heritage asset.

#### Sustainability, Access and Transport

Under Development Policy DP22, there is a requirement for non-domestic developments of 500 sq m or more to achieve at least a 'very good' BREEAM rating. The proposals do not involve any alterations to the building fabric, any proposals to improve the BREEAM rating of the building would be substantially restricted by the building's Grade I listed status. The proposed change of use itself would have a minimal material impact on the building itself. As such, a formal assessment of sustainability is deemed inappropriate in this instance.

In relation to access, Development Policies, DP16-19 set out a series of access requirements for any development including accessibility by walking, cycling, use of public transport and private car with the emphasis on reducing reliance on use of private cars.

The site is highly accessible by public transport with both Goodge Street underground station, 450m to the west, and 650m of Russell Square underground station to the north-east, as well as



being in close proximity to numerous bus routes. There are no existing parking spaces on site and none are proposed. Given the accessibility of a wide range of modes of public transport, it is not considered that the proposed change of use will create any undue pressure on the transport infrastructure around the site.

Due to the existing steps leading up to the main entrance to the listed building it is not possible to create any permanent disabled access to the building without significantly altering the character of the façade.

### Summary

The application proposes a material change of use of No.12 Bedford Square from office (Class B1) use to office and/or non-residential educational institution (Class B1/D1) use. No physical changes are proposed as part of this application and the proposed use is entirely in keeping with the Grade I listed status of the property.

The Bloomsbury area is characterised by a mix of uses including a number of colleges and universities. Therefore, the proposals would be in keeping with the character of the wider area in line with DP15.

The number of staff employed on the site, should the building be utilised for educational purposes, would be similar to the number of staff employed should the building be utilised for offices. Similarly the impact on residential amenity in the vicinity of the site would be similar to that of an office use in accordance with CS10.

The site is highly accessible by public transport in accordance with the objectives of Policy CS10 and DP15.

### Application submission

We enclose a cheque for £335, the requisite fee for this planning application, along with three copies of the following documentation to support this application:-

- A site location plan at 1:1250 scale;
- Existing and proposed plans; and
- Planning application form.

We trust that you have all of the information you require in respect of the application. Should you have any queries or require any further information please do not hesitate to contact Graham Oliver or Hannah Farmer of this office.

Yours faithfully,



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Enc.

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