

PLANNING REPORT

Knight Frank

Planning Supporting Statement

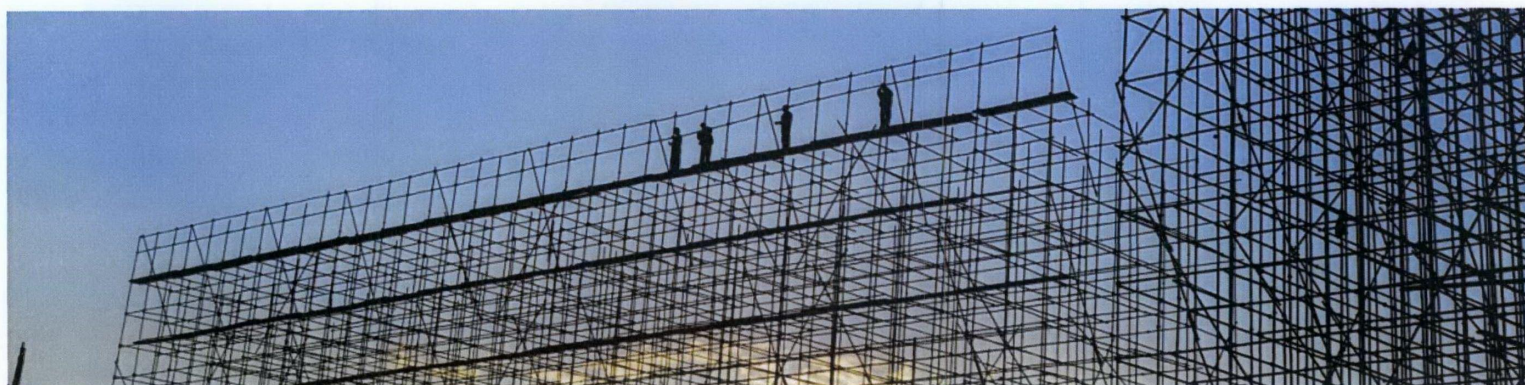
15 Bloomsbury Square, London WC1A 2LS

Prepared on behalf of Le Cordon Bleu

March 2010

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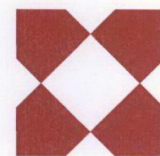


1.0 Introduction

- 1.1 This Supporting Statement provides detailed information to accompany a planning application which seeks to change the use of part of no. 15 Bloomsbury Square, London WC1A 2LS from Class B1(a) (Offices) to Class D1 (Non-Residential Institution) of the Town and Country Planning (Use Classes Order) 1987 (as amended). Detailed evidence relating to the nature of the existing and proposed use of the property is included within this Supporting Statement.
- 1.2 This planning application seeks to obtain a change of use from Class B1(a) 'offices' to Class D1 'non-residential institutions' that is personal to Le Cordon Bleu **only** and no other named non-residential institutional organisation falling within Class D1. It is requested that any future planning permission includes an associated condition that makes it clear that the occupation of no. 15 Bloomsbury Square for Class D1 purposes is only permitted for Le Cordon Bleu and no other named D1 user and if Le Cordon Bleu were to vacate no. 15 Bloomsbury Square, the lawful use should revert back to Class B1(a) 'offices' as currently exists. Justification for the planning permission being made personal to Le Cordon Bleu is set out at para. 4.40 of this Supporting Statement.
- 1.3 This planning application for a change of use relates to part of the basement (186.45 sq m GIA / 111.55 sq m NIA) and ground floor (212.95 sq m GIA / 136.91 sq m EIA) of no. 15 Bloomsbury Square and the whole of the first (364.15 sq m GIA / 300.8 sq m NIA), second (364.17 sq m GIA / 301.69 sq m NIA), third (360.29 sq m GIA / 295.65 sq m NIA), fourth (321.01 sq m GIA / 251.25 sq m NIA) and fifth floors (262.87 sq m GIA / 84.87 sq m NIA). Please note that the change of use applies only to the existing Class B1(a) 'office' accommodation present within the building and does **not include** the small retail unit (75.49 sq m NIA and 95.52 sq m GIA) located at the basement and ground floor levels fronting Pied Bull Yard. A full area schedule is attached at Appendix 1 of this Supporting Statement.
- 1.4 At this stage, the planning application is seeking to establish the general principle of a change of use only and does not include details of any future building works, fit-outs or signage which may be required should the application be approved. As such, as this planning application seeks to establish the principle of a change of use only and does not involve any physical works or alterations to the property, a stand alone Design and Access Statement is not required. The applicant supports the imposition of any conditions that the



Local Planning Authority considers necessary, the details of which would be submitted to, and agreed with, the LB Camden prior to the occupation of the building by Le Cordon Bleu. This could include details relating to waste storage; ventilation equipment; and a Green Travel Plan.



2.0 Site Description and Planning History

- 2.1 No. 15 Bloomsbury Square is located on the western side of Bloomsbury Square in the London Borough of Camden. The front elevation and main entrance into the property faces onto Bloomsbury Square with the rear backing onto Pied Bull Yard. Running alongside the southern elevation of the site is an alleyway leading from Bloomsbury Square into Pied Bull Yard. Pied Bull Yard itself can also be accessed from Bury Place or via an alleyway from Galen Place. Figure 1 reproduced below from www.google.com/maps refers.

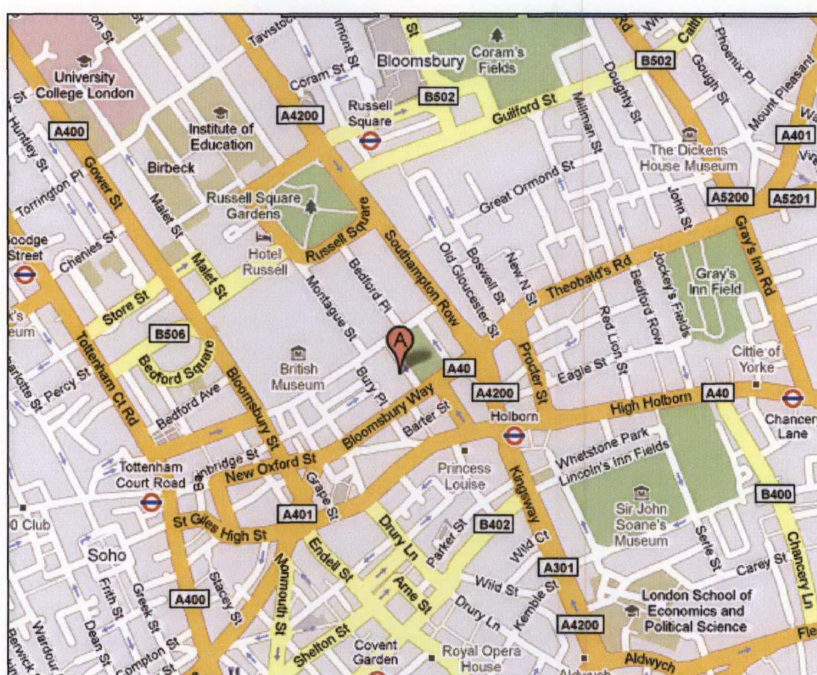
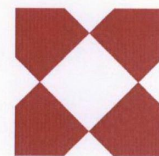
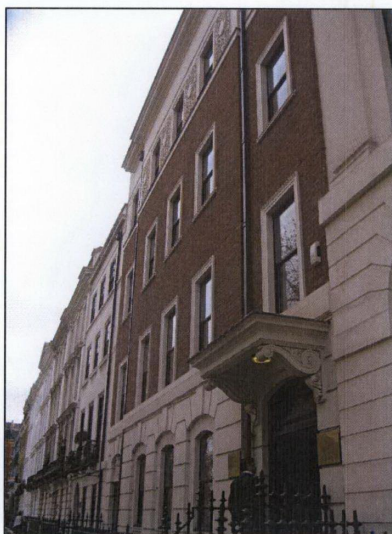


Figure 1: Site Location Plan

- 2.2 No. 15 Bloomsbury Square is exceptionally well connect to the public transport system being located approximately 400m to the north of Holborn underground station (4 minute walk), 600m to the north-east of Tottenham Court Road underground station (7 minute walk), 700m to the south of Russell Square underground station (8 minute walk) and 900m to the west of Chancery Lane underground station (11 minute walk). This provides easy access from no. 15 Bloomsbury Square to the Central, Piccadilly and Northern London underground lines. Bloomsbury Square itself is served by a number of strategic London bus routes including nos. 19, 38, 55, 98, N35, N41 and N207.

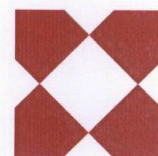


- 2.3 The property comprises accommodation over basement, ground and 5 upper floors. The building is predominantly used as Class B1(a) 'office' accommodation with the exception of a self-contained retail unit to the rear fronting onto Pied Bull Yard. Please note that this planning application relates to the part of no. 15 Bloomsbury Square used as Class B1(a) 'office' accommodation only and does not include the retail unit which will remain as existing. The building occupies a built footprint of approximately 3,396 sq ft and comprises office accommodation totalling 15,960 sq ft / 1,483 sq m NIA with the rear retail unit including 812 sq ft / 75.49 sq m NIA over basement and ground floors.
- 2.4 The building is of similar design to adjacent buildings being constructed of red brick with a rusticated stucco ground floor, rectangular recessed sash windows and a porch over the door. Iron railings run alongside the building adjacent to Bloomsbury Square.



Photograph 1: Frontage onto Bloomsbury Square

- 2.5 The building lies opposite a public area of green open space known as Bloomsbury Square. It includes areas of soft landscaping, mature trees and a children's play area. Situated on the opposite side of the park is Victoria House, an imposing Grade II listed building. Underneath the open space, with the entrance just opposite 15 Bloomsbury Square, is a car park providing spaces for 450 cars across seven levels. This car park is managed by Camden Council and is available for the use of residents in addition to hotel and business users.



Photograph 2: Bloomsbury Square



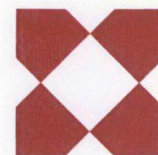
Photograph 3: Entrance to Car Park

- 2.6 It is important to note that 15 Bloomsbury Square is not a listed building but the majority of other buildings located around the square are Grade II listed which includes numbers 14 and 17 Bloomsbury Square which lie either side of the subject property.

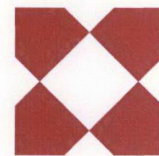
Planning History

- 2.7 Regard has been had to the London Borough of Camden's online statutory planning register. It is considered that the planning application dating from 1981 refers to the building which stands on the site today although it has not been possible to view the plans attached to this permission to confirm that this is the case. The table below sets out those planning applications that have been submitted at the site:

Application Number	Description	Decision	Decision Date
PSX0204196	Alterations to fenestration to include the addition of 2 No. windows to the south facing flank wall, and the addition of 3 No. windows to the north facing wall to rear.	Permission granted	01/07/2002
9401531	Installation of 3 closed circuit television cameras, two on the front elevation and one to the rear	Permission granted	10/03/1995
9470303	Siting of 3 closed circuit television cameras to be positioned on the external wall	Withdrawn	N/A



9180110	The erection of two 1.5m x 1.2m "V" agents letting signboards one on the Bloomsbury Square elevation and one on the Pied Bull Yard elevation.	Permission granted	27/08/1991
9170155	Erection of 5 ft x 4 ft "V" signboards.	Application withdrawn	22/08/1991
8900339	Retention of air conditioning units.	Permission granted with conditions	11/10/1989
8580220	The continued display of non-illuminated sign measuring 24 inches by 12 inches affixed to the front area railings.	Permission granted	18/12/1985
N14/29X/A/2586/R2	Demolition of unlisted buildings in a Conservation Area.	Consent granted with conditions	22/05/1981
N14/29X/A/31782/R2	Construction of new buildings at 24-28 Bloomsbury Way, 15 Bloomsbury Square, Pied Bull Yard and (new) Galen Place, works of alteration and extension and changes of use for offices, institutional, residential, retail and workshop/retail uses.	Permission granted with conditions	Decision notice not dated. Application submitted 23/12/1980 and subsequently revised 27/02/1981 and 09/04/1981



3.0 Le Cordon Bleu

- 3.1 This planning application seeks to change the use of part of no. 15 Bloomsbury Square from Class B1(a) 'offices' to a Class D1 'non-residential institution' to allow the occupation of the building by Le Cordon Bleu as a School of Culinary Arts. Le Cordon Bleu was founded in Paris in 1895 and today encompasses 30 schools in 15 countries providing culinary education for 20,000 students of more than 70 nationalities. Le Cordon Bleu is internationally renowned and synonymous with the highest standards of teaching, performance and excellence. The respect with which Le Cordon Bleu is afforded resulted in their being chosen to prepare the dinner for the Coronation of Queen Elizabeth II.
- 3.2 Le Cordon Bleu's London school was founded in 1933 and is currently located in the City of Westminster at 114 Marylebone Lane. The school welcomes over 500 students every year represented by over 30 different nationalities. Teaching is based upon traditional French culinary techniques with small class sizes of no more than 10 students to 1 chef who will provide individual instruction and feedback on each dish prepared. Students study for either one of the 'Diplome de Patisserie' or 'Diplome de Cuisine', each of which includes basic, intermediate and superior levels. Students will be awarded 'Le Grand Diplome' if they achieve diplomas in both cuisine and patisserie excellence.
- 3.3 Le Cordon Bleu currently offers culinary training and education from premises located in the City of Westminster at 114 Marylebone Lane (please see photograph 4 below). Le Cordon Bleu want to offer courses to a greater number of students in higher quality, contemporary accommodation which necessitates moving away from 114 Marylebone Lane which is severely constrained in terms of available space and opportunities for expansion.



Photograph 4: Existing Le Cordon Bleu Premises



- 3.4 No. 15 Bloomsbury Square has been identified as a preferred alternative to 114 Marylebone Lane following a thorough and extensive search of available properties. The property is considered particularly suitable given the amount of floorspace it offers; its Central London location with good access to public transport; its sizeable basement plant room; and attractive location with access to Bloomsbury Square and bespoke / specialist retailing including the Sicilian Avenue and Pied Bull Yard. The new premises at no. 15 Bloomsbury Square would allow Le Cordon Bleu to offer culinary education courses to 500 students per term arranged over four 11 week terms (winter, spring, summer and autumn). During term time, a total of 300 students would attend classes at the property over 3 separate sessions spread throughout the day. Please note that courses are offered to adults only, predominately in the age ranges of 18 to 35 years.
- 3.5 Le Cordon Bleu employs a number of people who are responsible for the day to day running of the School of Culinary Arts. This would include 10 full-time teachers / chefs; 6 kitchen porters; 3 customer service staff; and 15 administrative staff in addition to 10 part-time night cleaners. The premises would be open Monday to Friday from 07.30 am to 23.00 pm and on Saturday from 08.00 am to 17.00 pm. During term time classes would run from 09.00 am to 22.00 pm Monday to Friday and 09.00 am to 16.00 pm on Saturday during term time. The majority of daily deliveries would occur between 8am and 9am (Monday to Saturday) with one regular drinks delivery at around 11am.
- 3.6 It is important to note that Le Cordon Bleu currently participates in the City of Westminster ResCard scheme which invites local organisations to offer discounts to Westminster residents who hold a valid ResCard. Information relating to Le Cordon Bleu's participation in this scheme can be found at <http://www.rescard.com/smartsave-article/Special-Interest/291> with card holders being offered a 20% discount on the price of demonstration tickets. Le Cordon Bleu would be more than happy to discuss with the London Borough of Camden how a similar scheme could be offered to Camden residents should the School of Culinary Arts relocate to no. 15 Bloomsbury Square.



4.0 Planning Policy Context

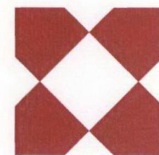
- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for the site currently comprises two principal policy documents. The London Plan (Spatial Development Strategy for London) adopted in February 2008 and prepared by the Greater London Authority (GLA) and the June 2009 version of the London Borough of Camden UDP (originally adopted June 2006). Regard will also be had to the policies contained in the Proposed Submission Versions of the LB Camden Core Strategy DPD and Development Policies DPD which, although not formally adopted, have reached a relatively advanced stage of preparation.
- 4.3 No. 15 Bloomsbury Square is designated on the LB Camden UDP Proposals Map as falling within the Bloomsbury Conservation Area, within the Central London Area (Clear Zone Region) and within an Archaeological Priority Area. The site is not safeguarded for Crossrail but the area to the south of Bloomsbury Square, along High Holborn, is safeguarded for Crossrail Line 2. Bloomsbury Square itself is designated as a Protected Area of Open Space.

New Community Facilities

- 4.4 The use of no. 15 Bloomsbury Square by Le Cordon Bleu as a non-residential Class D1 School of Culinary Arts falls under the definition of 'community uses' as set out at para. 8.2 of the adopted UDP and at para. 15.2 of the emerging LDF Development Policies DPD by virtue of being an educational and training facility. UDP Policy C1 '*New Community Uses*' supports the introduction of new community uses and states that *"the Council will grant planning permission for the development of community uses in suitable locations."* Part C of Policy C1 goes on to state, in the specific context of educational and training facilities, that *"the Council will grant planning permission for the development of educational uses ... provided that travel demand associated with the development would not harm the transport system."*



- 4.5 The UDP, at para. 8.16, goes on to recognise the value of education and training facilities relocating into the Borough that, like Le Cordon Bleu, are vocationally based. It states that *“educational opportunities are necessary to enable people to obtain the skills required in the workplace, and a sufficient number of good quality sites and buildings for educational use are needed to maintain London’s international role as a place of learning and research.”* Furthermore, it identifies access to education as an important issue for increasing employment and developing the Borough’s wider economy.
- 4.6 This general support for the establishment of new community facilities has been taken forward by the Local Planning Authority into the emerging LDF Core Strategy DPD that makes it clear at para. 10.2 that *“the Council will seek to ensure a wide range of services and facilities to meet community needs are provided in the Borough including education ...”* The emerging LDF Development Policies DPD adds more detail to the strategic direction taken in the Core Strategy and reiterates the support of the Council for community facilities which includes, as set out at para. 15.2, all educational and training facilities such as Le Cordon Bleu. Policy DP15 will ensure that all proposals for new community premises are:
- (a) close or accessible to the community they serve;
 - (b) accessible by a range of transport modes, in particular walking, cycling and public transport, and;
 - (c) located in the Central London Area or a designated Town Centre.
- 4.7 The UDP and emerging LDF recognise that there are two broad types of community uses present in Camden – those that serve a local catchment and should be located close to the community they are intended to serve and those with London-wide, national or international significance and should be easily accessible by public transport. Le Cordon Bleu falls into the second category as it offers courses in culinary excellence to students from the UK and around the world who will live in London while they undertake their course. It is considered that no. 15 Bloomsbury Square is an appropriate location for a use that serves a spatially diverse clientele given that it lies less than 1km from four individual underground stations and is well connected to the strategic London bus network (see earlier para 2.2).
- 4.8 Bloomsbury Square lies a short 4 minute walk from Holborn underground station and little more than a 10 minute walk from either of Tottenham Court Road; Chancery Lane; or Russell Square underground stations. In relation to cycling, Bloomsbury Square is served by



two London Cycle Network Routes as illustrated at Figure 2 produced below. The two routes are Route No. 39: Hyde Park – Tottenham Court Road – Theobalds Road – Rosebery Avenue and Holborn Circus – Whitechapel (shown as red on Figure 2) and Route No. 6: Camden Square – Royal College Street – Bloomsbury – Waterloo – Elephant and Castle (shown as blue on Figure 2). In addition to being well connected to designated cycling routes (<http://maps.camdencyclists.org.uk/>), no. 15 Bloomsbury Square is also located only a short walk from a number of public cycle racks as shown in Figure 3.

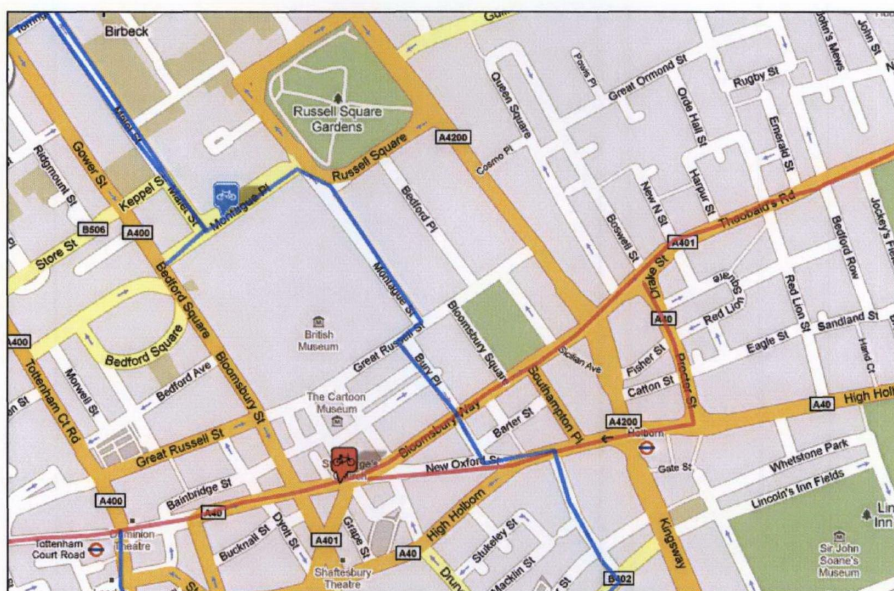


Figure 2: London Cycle Network Routes

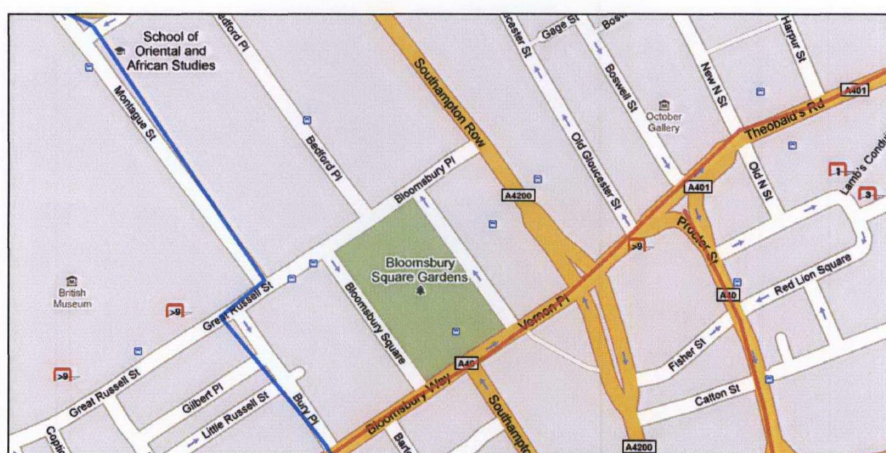


Figure 3: Public Cycle Racks



- 4.9 As can be seen from the previous paragraphs, no. 15 Bloomsbury Square is exceptionally well connected to the public transport system being located only a short walk from 4 London underground stations; numerous strategic bus routes; two London Cycle Network Routes; and is well served by cycle storage racks. In addition, the site falls within the Central London Area as defined on the adopted UDP Proposals Map and consequently achieves the requirements of emerging LDF Development Policies DPD Policy DP15 parts (g) to (i) concerning the suitability of sites to accommodate new community type uses.
- 4.10 It is considered that the relocation of Le Cordon Bleu from its existing premises in the City of Westminster to no. 15 Bloomsbury Square in Camden accords with many of the aims set out in the adopted UDP and emerging LDF. It will introduce a new community use into a highly accessible location that will offer high quality and internationally recognised vocational training in culinary education. Planning permission for a change of use at no. 15 Bloomsbury Square is sought to ensure that Le Cordon Bleu can continue to offer culinary education and training in accommodation that is of a much higher quality, layout and specification.

Loss of Existing Office Accommodation

- 4.11 This planning application seeks to change the use of part of no. 15 Bloomsbury Square (excluding the rear retail unit) from Class B1(a) 'offices' to a Class D1 non-residential School of Culinary Arts. This proposal would result in the loss of approximately 1,483 sq m or 15,960 sq ft NIA of Class B1(a) 'office' floorspace. Regard will therefore be had to any policies in the Development Plan that consider the acceptability, or otherwise, of proposals that involve the loss of existing Class B1(a) 'office' floorspace.
- 4.12 UDP Policy E2 states, as a general approach, that *'the Council will not grant planning permission for development that involves the loss of a business use on a site where there is potential for that use to continue.'* However, the final part of Policy E2 states that *"when a site is not suitable for continuation of any business use other than B1(a) offices, as an exception to the general approach, the Council may allow a change to other uses. In such cases, the Council will seek a change to permanent residential uses or community."*
- 4.13 This policy approach has been taken forward into the emerging Camden LDF Core Strategy DPD which reiterates, at Policy DP13, that *"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 use or community uses." The justification for this approach is set out at para. 8.8 of the emerging LDF Core Strategy which explains that "... *the future supply of offices in the Borough can meet projected demand*" and therefore changes of use for either housing or community purposes will be considered acceptable.

Suitability for Business Uses other than B1(a) Offices

- 4.14 Prior to the Council considering a change of use of Class B1(a) 'office' premises for either residential or community purposes, it is necessary to demonstrate that the property in question is not suitable for the continuation of any other business use falling outside Class B1(a). Appendix 2 of this Supporting Statement includes a letter received from Knight Frank's West End Development Department who specialise in marketing properties that are suitable for a range of business uses including Class B1(a) (offices), Class B1(b) (research and development), Class B1(c) (light industrial), Class B2 (general industrial) and Class B8 (storage and distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended).
- 4.15 The letter can be referred to in full at Appendix 2 but is worth summarising within this Section. The letter states that no. 15 Bloomsbury Square was constructed in the early 1980s as a Class B1(a) 'office' building and as a result, would be difficult to convert in order to accommodate any alternative non B1(a) business uses. The principal reasons for this include the lack of an off-street parking or loading area; absence of loading facilities; limited lift capacity; and floor loading limits; all of which would make the property unsuitable for business uses falling within Class B1(c) '*light industrial*,' Class B2 '*general industrial*' or Class B8 '*storage and distribution*.' In addition, due to the size of the building; general location; location of building services; and difficulties of sub-division; the building is considered as being generally unsuitable for any research or development uses falling within Class B1(b).
- 4.16 UDP Policy E2 and emerging LDF Development Policies DPD Policy DP13 both allow, as an exception to normal policy, the loss of existing office premises to either residential or, as in the case of this planning application, community uses if "*it can be demonstrated that a site is not suitable for any business use other than B1(a) offices.*" The letter attached at Appendix 2 of this Supporting Statement clearly demonstrates that the building was designed and constructed to offer accommodation for Class B1(a) 'office' occupiers only and, due to constraints of building fabric, size, height, lift access, off-street vehicle access, general



location, floor loading and sub-division, is not considered suitable for accommodating any alternative business uses falling outside Class B1(a) 'offices.' Given that the building is not suitable for any business use other than Class B1(a) 'offices,' the Local Planning Authority are able to grant planning permission for a change of use of no. 15 Bloomsbury Square from Class B1(a) 'offices' to a Class D1 non-residential School of Culinary Arts in the context of adopted UDP Policy E2 and emerging LDF Development Policies DPD Policy DP13.

Demand and Supply of Offices in the Locality

- 4.17 The reason for the Local Planning Authority allowing the loss of existing premises that are not suitable for any business use other than Class B1(a) 'offices' is given at para. 8.8 of the proposed submission version of the LDF Core Strategy DPD which points to "... *the future supply of offices in the Borough (which) can meet projected demand.*" This part of the Supporting Statement will demonstrate that the loss of 1,483 sq m / 15,960 sq ft NIA of B1(a) 'office' floorspace at no. 15 Bloomsbury Square would not result in any material impact upon the supply of Class B1(a) 'office' accommodation in the London Borough of Camden as a whole or the area of Noho / Bloomsbury within which the property is located. Nor would it impact upon the ability of future office occupiers to find suitable office premises in this part of Camden.
- 4.18 Having regard to the Table included at Appendix 3 of this Supporting Statement, in the third quarter of 2009 – the most recent period for which figures are available - there was a total stock of 444,581 sq ft of Class B1(a) 'office' accommodation available for occupation in the Noho / Bloomsbury area. This stock of vacant and available accommodation offered 81,181 sq ft of new or refurbished office space; 158,940 sq ft of 'second hand A' office space and 204,460 sq ft of 'second hand B' office space. 'Second hand A' office space generally describes a property in reasonably good condition including air-conditioning while 'second hand B' office space describes a property without the benefit of air-conditioning and of relatively low quality. No. 15 Bloomsbury Square is considered to fall within the 'second hand A' office space classification.
- 4.19 The table also identifies Class B1(a) office take-up in the same period which equated to only 28,137 sq ft representing 6.33% of the total available office stock. These figures therefore suggest a large surplus of 416,444 sq ft of vacant and available Class B1 'office' accommodation in and around the area of no. 15 Bloomsbury Square that is available to the



market. This data demonstrates that supply is significantly exceeding demand and that the loss of approximately 15,960 sq ft (NIA) of office accommodation at no. 15 Bloomsbury Square that would result from the grant of this planning application would have little or no discernable effect upon availability of office space within the Noho / Bloomsbury area.

- 4.20 The Table produced below sets out available 'second hand A' office space in the vicinity of no. 15 Bloomsbury Square which is of similar quality to that currently offered at the subject property. It demonstrates that there is significant stock available to meet the needs of prospective office occupiers. A more extensive list of available office premises is attached at Appendix 4 of this Supporting Statement and shows that there is some 1,285,000 sq ft of vacant space in the WC1 and WC2 postcodes.

Date Marketed	Address	Floor Area (sq ft)	Specification
15/12/09	21 Southampton Row	4,460	Air con Raised access flooring Suspended ceilings LG7 lighting
1/12/09	210 High Holborn	2,396	Air con Raised access flooring LG7 lighting
20/11/09	Fox Court, 14 Grays Inn Road	11,512	Air con Raised access flooring Suspended ceilings
11/09/09	The Connection, High Holborn	3,854	Air conditioning Raised access flooring Suspended ceilings Commissionaire Passenger lift
24/08/09	74-77 Great Russell Street	1,589	Air conditioning Raised access flooring Suspended ceilings Passenger lift
11/08/09	198 High Holborn	2,065	Air conditioning Raised access flooring Suspended ceilings
27/07/09	Dragon Court, 27-29 Macklin Street	19,914	Air conditioning Raised access flooring Suspended ceilings Commissionaire Passenger lift

- 4.21 When looking at the relationship between the average rental cost of office space per quarter and percentage take up of office space per quarter, it is possible to identify a clear



relationship between the two. The relationship follows that of a normal demand and supply trend. The present office market is characterised by low rates of take-up of available office space which has resulted in average rental levels falling away in direct response (see Figures 5 and 6). With take-up of available Class B1 'office' space being extremely low, there is a large amount of vacant office space available to prospective tenants at extremely low rents. This lack of take-up was evident in the marketing of no. 15 Bloomsbury Square by Knight Frank LLP which commenced in March 2009 and received no interest from prospective Class B1 'office' occupiers. The loss of office space from no. 15 Bloomsbury Square is likely to have no discernable impact upon the local office market given the over-supply of directly comparable 'second hand A' space.

- 4.22 The schedule of available office properties located within the WC1 and WC2 postcodes as attached at Appendix 4 of this Supporting Statement, demonstrates not only that there is a large amount of vacant office space available to the market at relatively low rental levels, but also that take-up of available office space is exceptionally low. On analysis of figures for the 3rd quarter of 2009 (see Figure 5), take-up of available office space only reached 6.33% leaving nearly 94% of total available office floorspace vacant. This clearly illustrates the vast over supply of B1 accommodation in the Borough as a whole and also within close proximity to the subject property at Bloomsbury Square.
- 4.23 No. 1 Alfred Place, which is located a short distance to the west of the subject property, is a good example of the low take-up rates having been first marketed on the 15th May 2009 yet remains vacant. Swan House at nos. 37 to 39 High Holborn is similar having been first marketed on the 23rd April 2009 but again remains vacant and unlet. The main point to note is that the loss of no. 15 Bloomsbury Square as office accommodation would not result in any discernable impact upon the availability of office accommodation in the immediate locality given the quantum of similar quality premises currently on the market at competitive rental levels.

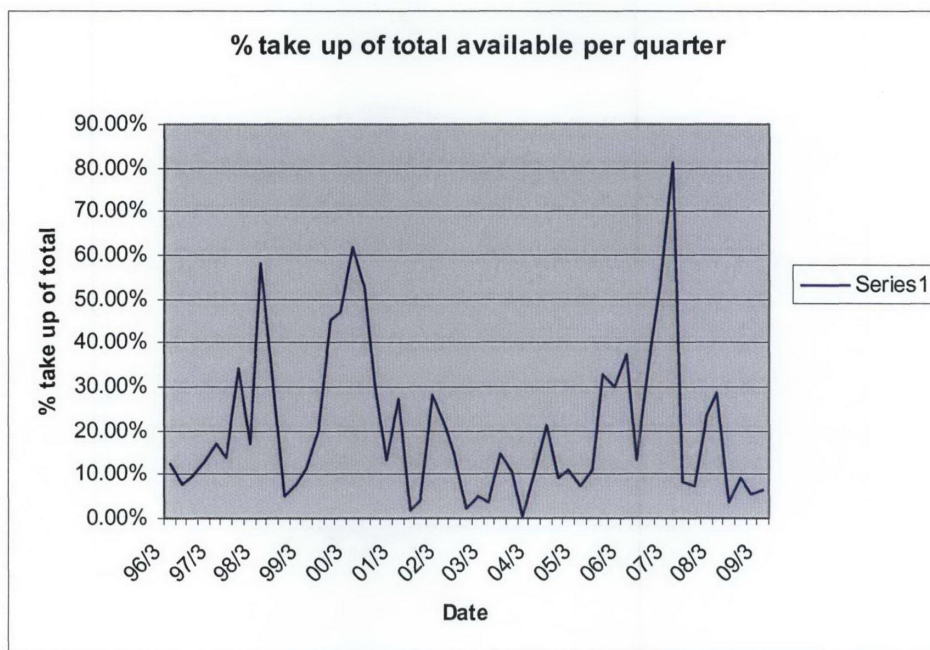
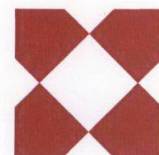


Figure 5: Rates of Office Take-Up vs. Availability

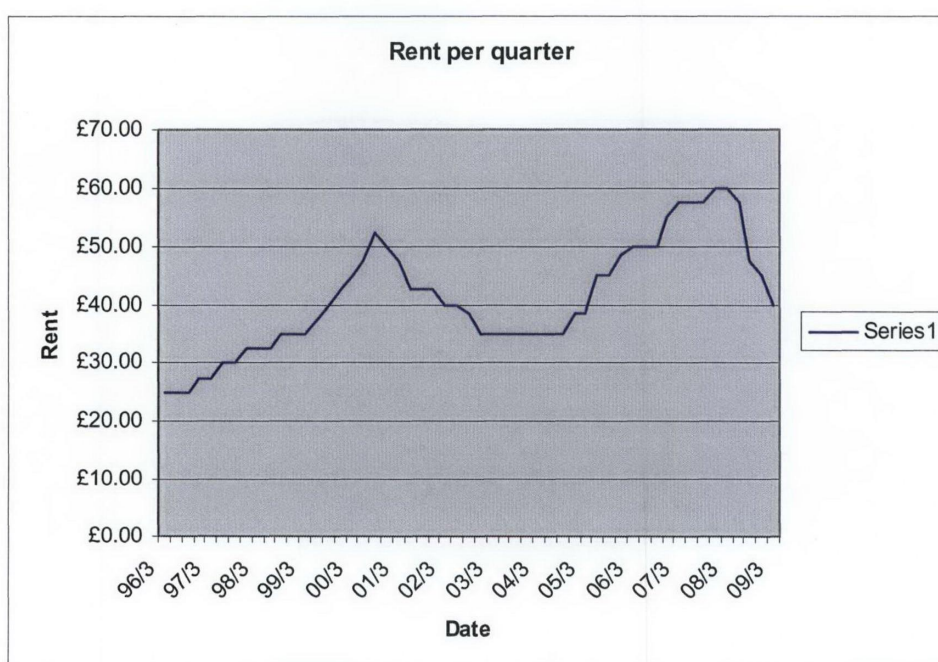


Figure 6: Office Rental Levels

- 4.24 Regard has also been had to the Camden Employment Land Review (2008) which estimated that between 2006 and 2026 there would be an increase in demand for office



accommodation in the Borough by around 615,000 sq m (6,619,805 sq ft). In order to satisfy this demand, the Council has identified a number of 'Growth Areas' within which new commercial office development will be directed. The Proposed Submission version of the LDF Core Strategy DPD refers to these areas within Policy CS 2 and identifies them as Kings Cross, Euston, Tottenham Court Road and Holborn.

- 4.25 At Kings Cross, large scale redevelopment is already underway with planning permission having been granted for 444,000 sq m (4,779,176 sq ft) of new office space. Network Rail has plans to remodel Euston Station in order to alleviate overcrowding and to meet predicted future growth in passenger numbers. The LB Camden envisages that in the second half of the Core Strategy adoption period, large scale office development in the vicinity of Euston Station would be capable of providing in the region of 70,000 sq m (753,474 sq ft) of office floorspace.
- 4.26 In the other identified Growth Areas of Holborn and Tottenham Court Road, the Proposed Submission version of the LDF Core Strategy DPD expects significant but smaller levels of office development to be delivered to the market. Para. 8.8 of the document states that the delivery of additional office space in the Growth Areas will ensure that supply is capable of meeting projected demand. It goes on to state that the Council will therefore consider proposals for other uses of older office premises if they involve the provision of permanent housing or, as in the case of this planning application, community uses.

Mixed-Use Character of Bloomsbury Square

- 4.27 Para. 8.7 of the adopted UDP relates to proposals involving the introduction of new community uses and advises that *"the most appropriate locations for new community facilities are on sites in non-residential use within predominantly residential or mixed-use areas..."* No. 15 Bloomsbury Square is considered a suitable location for the introduction of a Class D1 non-residential School of Culinary Arts given that it is currently in non-residential use; lies in close proximity to public transport modes (see paras. 4.8 to 4.9); and is located in an area with a strong and vibrant mixed-use character which includes community, business, retail, institutional and residential accommodation.
- 4.28 The property falls within the Bloomsbury Conservation Area and given that this planning application does not propose any physical alterations to the building, it will be the



introduction of the proposed Class D1 non-residential School of Culinary Arts use that will be assessed in the context of adopted UDP Policy B7. The policy states that *"the Council will only grant consent for development in a Conservation Area that preserves or enhances the special character or appearance of the area."* As stated above, the special character of the area is one of a vibrant and dynamic mixture of uses which includes a number of specialist community and institutional occupiers. These include:

- Malvern House College at nos. 46-47 Bloomsbury Square which specialises in English language courses;
- Anglo American Educational Services at no. 22 Bloomsbury Square which was established to service study-abroad programmes based in London;
- Albion College at no. 23 Bloomsbury Square which is an independent College offering pre-university, degree and professional programmes;
- The German Historical Institute at no. 17 Bloomsbury Square which is an independent academic institution focusing on modern history;
- The Chartered Institute of Arbitrators at no. 12 Bloomsbury Square, and;
- Specialist retail at the Sicilian Avenue and Pied Bull Yard.

4.29 As can be seen from the list of occupiers above, Bloomsbury Square, in addition to office accommodation and some limited housing, is characterised by a variety of community and institutional uses focused upon education and training. It is considered that the occupation of no. 15 Bloomsbury Square by Le Cordon Bleu as a School of Culinary Arts would positively contribute to the existing special character of the area with the use having a direct relationship and synergy with other adjacent occupiers. Le Cordon Bleu would build upon the vibrant and youthful feel of the Square, ensuring that this part of London continues to offer educational and training courses to the highest national and international standards.

Transport Implications

4.30 The occupation of no. 15 Bloomsbury Square by Le Cordon Bleu would offer culinary education courses to 500 students per term arranged over four 11 week terms (winter, spring, summer and autumn). During term time, a total of 300 students would attend classes at the property over 3 separate sessions spread throughout the day. Please note that courses are offered to adults only, predominately in the age ranges of 18 to 35 years. At any



one time there would be no more than 100 students travelling to the premises to attend lessons. This is coupled with an additional 35 day teaching and administrative staff.

- 4.31 Having regard to the document '*Employment Densities: A Full Guide*' published in July 2001 by English Partnerships, it can be estimated that, at a ratio of one worker per 19 sq m / 205 sq ft of Class B1(a) 'office' floorspace (GIA), that no. 15 Bloomsbury Square would be capable of accommodating approximately 131 staff within its 2,482 sq m / 26,719 sq ft (GIA) of office accommodation. Given that no more than 135 people would be travelling to the site at any one time to attend Le Cordon Bleu courses (including staff) as a result of classes being spread throughout the day, a strong case can be made that the proposed use would have no materially greater impact upon the local transport system than if the premises were brought back into use as fully occupied Class B1(a) 'offices.'
- 4.32 In addition, it must also be noted that Le Cordon Bleu is proposing to relocate from its current premises at 114 Marylebone Lane in the City of Westminster to no. 15 Bloomsbury Square. This is an important consideration as the demand placed upon the public transport system by the 500 pupils that already attend the existing facility will simply be relocated from one part of the transport system to another. Having regard to the above, it is considered that the proposed use accords with adopted UDP Policy T2 and that the Council should "*grant planning permission for development where it considers that all forms of travel associated with the development can be accommodated by the capacity of the existing transport provision.*"
- 4.33 The proposed change of use of no. 15 Bloomsbury Square from Class B1 'offices' to a Class D1 non-residential School of Culinary Arts will have no discernable or materially greater impact on the local transport network by virtue of:
- the sites exceptionally high connectivity to various modes of public transport (see paras. 4.8 to 4.9);
 - the site being served by 4 separate underground stations all located little more than 10 minutes walk away;
 - the site being served by two separate strands of the London Cycle Network;
 - the site falling within the Central London Area;
 - Le Cordon Bleu offering courses to adults only who are able to travel to the site independently;



- the site being located in the Congestion Charge Zone thus discouraging the use of private vehicles;
- pupils accessing the site at different times throughout the day thus ensuring that pressures placed on the local transport network are minimised;
- the existing lawful use of the property as Class B1(a) 'offices' placing similar demands on the local transport network as the projected peak demand of the proposed Class D1 use;
- there is no car parking associated with the building although there is a public car park lying immediately opposite the site which could be used by staff or students who are unable to use public transport. This would ensure no additional pressure is placed upon on-street parking in the vicinity of the site.

4.34 Having regard to the above, and Policy T1 of the adopted UDP, it is not considered that the development as proposed would significantly increase travel demand or would otherwise have a significant impact on travel or the transport system. However, the applicant would support the imposition of a Condition onto any future grant of planning permission that requires Le Cordon Bleu to submit for the agreement of the Council a Travel Plan that would encourage staff and students to access the site using the wealth of public transport modes available to them.

Plant (incl. Ventilation)

4.35 It is acknowledged that the occupation of no. 15 Bloomsbury Square by Le Cordon Bleu would require the installation of plant and ventilation / extraction equipment associated with cooking and food preparation taking place within the building. At this stage the applicant is seeking only to establish the principle of changing the use of the property from Class B1 'offices' to a Class D1 non-residential School of Culinary Arts and has yet to undertake any detailed space planning exercises (although the presence of a sizeable basement plant room at 4,417 sq ft will allow the majority of plant to be contained within the building).

4.36 The applicant would support the imposition of a Condition that requires, prior to the occupation of no. 15 Bloomsbury Square by Le Cordon Bleu, the submission of details of the siting; installation; and operation (including noise) of any plant to be installed into the building including that of ventilation and extraction. This approach will ensure that Le Cordon Bleu cannot occupy the building until the Council are comfortable that the plant proposed will not cause any harm or detriment with regard to noise; smells; vibrations or visual amenity.



Deliveries, Waste and Recycling Storage

- 4.37 On average around 6 deliveries would be made to the site per day (Monday to Saturday) and would occur between 8am and 9am, with one regular drinks delivery at around 11am. It is envisaged that all deliveries would be received on-street and transferred into the basement of the property down the stairs that lead directly off the street. It is not envisaged that the number of deliveries per day would be materially different to those associated with an office occupier but the applicant would support the imposition of a Condition that requires a Delivery and Servicing Plan to be submitted to and agreed with the LPA prior to the occupation of the building by Le Cordon Bleu.
- 4.38 The property benefits from a large basement area that comprises a 4,417 sq ft plant room. This is considered of a suitable size to accommodate waste storage (recyclable and non-recyclable separated) and the applicant would support the imposition of a Condition that requires the submission of details of waste and recycling storage to the LPA prior to the occupation of the building by Le Cordon Bleu in accordance with UDP Policy SD12. The property benefits from direct access from the basement onto the street for ease of waste collection.

Access

- 4.39 At present the property is fully accessible internally with each floor being served by a lift and having level floorplates. There are however 4 steps leading into the building from street level. It is acknowledged that the majority of properties bordering Bloomsbury Square have a similar frontage appearance with steps leading from the pavement to a raised entrance and that the loss of these steps would be likely to be considered detrimental to the character and appearance of the Bloomsbury Conservation Area. However, the applicant would support the imposition of a Condition that requires the applicant to have investigated possible ways of mobility impaired people being able to gain access into the building prior to occupation. This could include using the side entrance or rear entrance (in conjunction with the retail user) for level access.



Personal Permission to Le Cordon Bleu

4.40 It is requested that any future planning permission be made personal to Le Cordon Bleu and no other named Class D1 '*non-residential institutional*' user so that when Le Cordon Bleu vacate the premises, the lawful use reverts back to Class B1 '*offices*.' Para. 92 of Circular 11/95 relates to general considerations on occupancy and identifies that restricting the occupancy of a particular property to an individual user should only be allowed when special planning grounds can be demonstrated. It is considered that such grounds can be demonstrated in this case given that:

- planning permission granted for an unrestricted Class D1 non-residential institutional use could see the property occupied by a tenant that, unlike Le Cordon Bleu, could have a much greater impact upon the local transport network e.g. private school;
- should Le Cordon Bleu vacate the building, it would be very difficult to use it for any non-community use given the protection afforded by adopted UDP Policy C2. This would be overly restrictive, especially for a building of this size, and would expose the freeholder to uncertainty of future occupation;
- the Council are generally supportive of existing business premises, including Class B1(a) '*office*' stock and would, through the use of a personal permission, be able to ensure that should Le Cordon Bleu vacate, the lawful use would revert back to offices thus ensuring no permanent loss of stock.



5.0 Reasoned Justification

5.1 In light of the above, we therefore submit a planning application for a personal change of use from Class B1(a) (Offices) to Class D1 (Non-Residential Institution) of the Town and Country Planning (Use Classes) Order 1987 (as amended) for part of no. 15 Bloomsbury Square on the basis that:

- the change of use applies only to the existing Class B1(a) 'office' accommodation present within the building and totalling 15,960 sq ft / 1,483 sq m NIA and does not include the small retail unit 812 sq ft / 75.49 sq m NIA located at the basement and ground floor levels fronting Pied Bull Yard;
- Le Cordon Bleu offer internationally renowned courses in culinary excellence and are seeking to relocate from their existing premises in the City of Westminster to new premises at no. 15 Bloomsbury Square which are of a greater size and higher quality;
- the adopted and emerging Development Plan for the site generally supports the introduction of new community uses, including education and training facilities, recognising the value of such facilities locating into the LB Camden;
- no. 15 Bloomsbury Square is exceptionally well connected to the public transport system being located only a short walk from 4 London underground stations; numerous strategic bus routes; two London Cycle Network Routes; and is well served by cycle storage racks. This planning application seeks to introduce a new community use into a highly accessible location that will offer high quality and internationally recognised vocational training in culinary education;
- whilst the Development Plan, as a general approach, seeks to protect existing business uses, exceptions to this approach are allowed where an applicant can demonstrate that the subject property is not suitable for the continuation of any business use other than Class B1(a) 'offices.' In such cases, the LPA will allow changes of use for permanent residential and community purposes;
- it has been demonstrated that no. 15 Bloomsbury Square was originally designed and constructed to offer accommodation for Class B1(a) 'office' occupiers only and, due to constraints of building fabric, size, height, lift access, off-street vehicle access, general location, floor loading and sub-division, is not considered suitable for accommodating any alternative business uses falling outside Class B1(a) 'offices;'
- given that the building is not suitable for any business use other than Class B1(a) 'offices,' the Local Planning Authority are able to grant planning permission for a change



of use of no. 15 Bloomsbury Square from Class B1(a) 'offices' to a Class D1 non-residential School of Culinary Arts in the context of adopted UDP Policy E2 and emerging LDF Development Policies DPD Policy DP13;

- a large surplus of 416,444 sq ft of vacant Class B1 'office' accommodation is available to the market in and around the area of no. 15 Bloomsbury Square demonstrating that supply is significantly exceeding demand;
- the loss of approximately 15,960 sq ft (NIA) of office accommodation at no. 15 Bloomsbury Square would have little or no discernable effect upon the availability of office space within the Noho / Bloomsbury area;
- with take-up of available Class B1 'office' space being extremely low at only 6.33% of available stock – no. 15 Bloomsbury Square has been marketed since March 2009 with no interest from prospective office occupiers - there is a large amount of vacant office space available to prospective tenants at extremely low rents;
- the loss of office space from no. 15 Bloomsbury Square is likely to have no discernable impact upon the local office market given the over-supply of directly comparable 'second hand A' space;
- the delivery of a large amount of new office space in Camden's 4 Growth Areas will ensure that supply is capable of meeting projected demand in the short and longer term thus providing flexibility for premises suitable for only Class B1(a) 'office' purposes to be lost for permanent residential or community uses;
- No. 15 Bloomsbury Square is considered a suitable location for the introduction of a Class D1 non-residential School of Culinary Arts given that it is currently in non-residential use; lies in close proximity to public transport modes; and is located in an area with a strong and vibrant mixed-use character which includes community, business, retail, institutional and residential accommodation;
- the proposed use would have no materially greater impact upon the local transport system than if the premises were brought back into use as fully occupied Class B1(a) 'offices;'
- justification is provided so that any future planning permission be made personal to Le Cordon Bleu and no other named Class D1 'non-residential institutional' user so that when Le Cordon Bleu vacate the premises, the lawful use reverts back to Class B1 'offices.'

5.2 It is important to note that this planning permission seeks to establish the principle of Le Cordon Bleu occupying no. 15 Bloomsbury Square as a Class D1 School of Culinary Arts



only. Should planning permission be granted, Le Cordon Bleu would then commit the substantial funds required to establish the details of occupation. It is therefore requested that any grant of planning permission includes the imposition of Conditions (details of ventilation; access; waste / recycling storage) to be submitted to, and agreed by, the LPA prior to full occupation of the building.

- 5.3 This Supporting Statement has demonstrated that the proposed personal change of use at no. 15 Bloomsbury Square from Class B1 to Class D1 accords with all applicable Development Plan policies and should be granted planning permission by the London Borough of Camden as Local Planning Authority.