



GERALDEVE

Planning and Borough Development
London Borough of Camden
Judd Street
London
WC1H 9JE

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

21 April 2017

Our ref: GAO/HBR/EKB/J7860

Your ref:

Dear Sirs

52-53 Russell Square, London, WC1B Planning Application

We write on behalf of our client, École Jeannine Manuel UK, to submit a planning application in respect of 52-53 Russell Square, for the change of use of the existing premises from an office (Class B1) to non-residential institution (Class D1).

The Site

52-53 Russell Square is a Grade II listed building. The existing building comprises of a basement, ground and part four storey terraced property located on the south side of Russell Square. The site has a PTAL rating of 6b, the highest possible rating.

The site falls within the Bloomsbury Conservation Area, an Archaeological Priority Area and within the Central London Area.

Planning History and Lawful Use

There are a significant number of historic applications relating to 52-53 Russell Square. However, only the planning history of relevance is noted here.

On 30 March 1981, planning permission (ref. 29153) and listed building consent (ref. HB2295) were granted for works relating to the conversion and extension of the property to provide residential and office accommodation.

On 4 June 1985, planning permission (ref. 8500189) was granted for works of alteration and extension to form office accommodation.

On 15 July 2005, planning permission was granted for the change of use of the lower ground floor from office (Class B1) to alternative uses of either non-residential institution or office use (Class D1/B1). It is our understanding that the current tenant has occupied the premises in a fully office (Class B1) use since 2009 and accordingly, the D1 use ceases to exist at the property as the lawful use of the property would be whichever use was occupying the property at the end of the 10 year period (i.e. 15 July 2015).

On 10 May 2007, planning permission (ref. 2007/1410/P) and listed building consent (ref. 2007/1419/L) were granted for the erection of a rear extension at ground and first floor half-landing levels to accommodate additional office space, and associated works.

Whilst the original planning permission granting the office (Class B1) use at the premises is not available online, a number of planning permissions refer to an existing office (Class B1) use. Furthermore, the property was valued as an office and premises in 2010.

It is our understanding that the existing lawful use of the premises is as an office (Class B1).

Background

The current lease of 52-53 Russell Square comes to an end in January 2018. Accordingly, the Bedford Estate is looking to grant a new lease, in June 2018, once the Chartered Institute of Public Relations vacates the premises.

École Jeannine Manuel is a French, bilingual, non-profit, independent international school, registered as a charity and located at 43-45 Bedford Square, London. The school is the young sister school of its Paris namesake, founded in 1954 and recognised as the top French Lycée for the fourth consecutive year.

The UK based school opened in 2015 and currently educates 290 pupils from nursery age through to Year 9. Each year the school will take a new year group up to a maximum education level of Year 13. The school welcomes pupils from all nationalities, cultural traditions and native languages from 3 years old and the current pupil intake consists of more than 40 nationalities.

The school can only accommodate 430 pupils on Bedford Square and each year group consists of approximately 40 pupils through Year 10 and 60 thereafter. Accordingly, in 2018, there will no longer be enough capacity at its Bedford Square location to accommodate the school's older pupils.

On this basis, Ecole Jeannine Manuel is looking to take a lease of 52-53 Russell Square. The space at Russell Square offers approximately half the space they currently lease at 43-45 Bedford Square and is required to accommodate approximately 180 pupils (Year 11 – 13 age group) that cannot be accommodated at 43-45 Bedford Square due to the size of the property.

Pre-Application Enquiry

A pre-application enquiry in relation to the proposals was submitted in November 2016. A formal response to the proposals was received on 11 January 2017 (ref.2016/6038/PRE).

Generally officers considered that the proposals were acceptable in principle with additional information requested to be included within any Loss of Office Market Report submitted as part of the planning application.

The pre-application advice has been taken on board and incorporated into the proposals.

Proposals

Accordingly, in order for Ecole Jeannine Manuel to continue operating within the Borough, they are looking to enter into a new lease at 52-53 Russell Square. In order for them to occupy the property,

it will be necessary to change the use of the property from office (Class B1) to non-residential institution (Class D1).

The proposals will not result in any internal or external changes to the building.

Planning Policy

The statutory development plan consists of the Consolidated London Plan 2016, Camden's Core Strategy (2010) and Camden's Development Policies (2010). Camden is in the process of preparing a new Local Plan. Consultation on the main modifications to the submission draft closed on 13 March 2017. It is likely that the document will be adopted sometime in June or July 2017 and is therefore a material consideration of limited weight at this stage.

Planning Considerations

Loss of Office

Policy CS8 of Camden's Core Strategy seeks to ensure a strong economy in Camden by promoting the provision of office floorspace in growth areas and Central London and by safeguarding existing employment sites and premises in the Borough, to meet the forecast demand. The Policy also recognises the importance of other employment generating uses, including education.

Paragraph 13.2 of the Core Strategy notes that the Borough's aim is to make sure that the Borough's economy will be stronger and more diverse while helping more residents to have the skills, education and training to take up local job opportunities and bridge Camden's skills gap.

Policy DP13 of Camden's Development Policies 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 it can be demonstrated that the site or building is no longer suitable for existing business use, 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. 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.

Policy E2 of the emerging Local Plan echoes the sentiments of the currently adopted Development Plan Policies, seeking to resist re-development of business premises for non-business use unless it can be demonstrated that the site is no longer suitable for the existing use and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use have been fully explored over an appropriate period of time.

Camden Planning Guidance (CPG5 – Town Centres, Retail and Employment) lists various criteria for assessing applications for a change of use from business to non-business use. These include factors including the age and condition of the premises; location; whether there are existing tenants in the building and whether there is evidence of demand.

52-53 Russell Square has been combined laterally. The existing buildings comprise of 1,388sqm of office floorspace across the two buildings. Whilst the principal floors largely retain their original plan form, the basement, rear ground and upper floors have been altered and extended which has resulted in a heavily segregated and convoluted series of spaces within the building. It is noted that the office contains 22 separate rooms. This layout of spaces does not lend itself to office working, with the majority of conventional office occupiers seeking an open plan environment to base their

business. The desire to be based within an open plan office comes from the philosophy that staff will collaborate better in this sort of environment, as well as the occupational cost efficiencies.

The existing tenants have occupied the building since 2009. Whilst they have tried to sublet parts of the space to conventional office occupiers since this time, they have struggled and have resorted to renting parts of the building out on an hourly/daily rate to mitigate their liability since taking on the lease. These areas are predominantly used for training purposes. Kinney Green is in the process of searching for alternative premises for the existing tenant due to the inefficiencies of the existing building. Accordingly, it is not considered that the building is suitable for its existing business use.

The property is a Grade II listed building and due to its heritage significance, it would not be appropriate to redevelop. Accordingly, and in line with part (b) of Policy DP13, the building has been marketed for office use since June 2016. The specific details of the marketing that has been undertaken are contained within the Loss of Office Report submitted with the application.

Whilst the existing office tenant's agents have undertaken a full marketing campaign, the interest in the property has been predominantly from those wishing to use the building for educational purposes (D1) and, in one instance, as a consulate (Sui Generis in most circumstances). There has been no interest from conventional office (Class B1a) occupiers. Furthermore, due to its Central London location, listed nature and the local area predominantly being a mix of office (Class B1a), educational (Class D1), residential (Class C3) and visitor accommodation (Class C1) uses, a change of use to other business uses falling with Class B2 and B8 is not considered appropriate.

Policy DP13 goes on to state that where it can be demonstrated that a site is not suitable for any business use other than B1(a), which we consider has been demonstrated, the Council may allow a change to permanent residential or community uses.

Accordingly, on this basis, it is considered that a change of use to educational facility, which is also considered a community use, will provide a suitable alternative to the existing business use, whilst still retaining a significant number of jobs on site (23) and providing a community facility to serve local residents. As such the change of use is considered to be directly in accordance with Policy DP13.

Provision of Educational Use

Policy CS10 states that the Council will work with its partners to ensure that community facilities and services are provided for Camden's community and people who work in and visit the Borough. Additionally, part f) of the policy states that the Council will support the retention and enhancement of existing, community, leisure and cultural facilities.

Development Policy DP15 states that to help meet increased demand for facilities, the Council will expect developments that result in any additional need for community or leisure facilities to contribute towards supporting existing facilities or providing for new facilities.

Policy C2 of the emerging Local Plan aims to provide a high standard of education and training for everyone. Policy C2 (a) aims to provide 963 new school places in Camden and part (d) aims to provide a range of community facilities to support Camden's growing population. The proposals would therefore offer educational and community facilities in line with Policy C2 of the emerging Local Plan.

It should be noted that Ecole Jeannine Manuel's primary school, located on Bedford Square, currently contains 290 pupils. Of this 290, 60 pupils reside within the London Borough of Camden

(21%) and we are advised that a considerable number of existing pupils' parents are considering moving to the Borough in the foreseeable future. The proposed school extension is therefore aimed at educating residents of the Borough.

Whilst an educational facility does not technically fall within a "business" or "employment" use, the proposed school will generate employment and it is proposed to employ 23 full time staff at the building. The number of workers currently employed within 52-53 Russell Square is 54. Whilst the proposals will result in the reduction in number of employees on site, the reduction is considered marginal in the context of bringing a listed, historic building into a viable use, as well as providing a community facility to serve local residents. It is also worth noting that a considerable amount of the existing floorspace is already currently used for training purposes. Please see the Loss of Office Report submitted with this application for more information.

We note that where proposals result in the reduction in number of jobs, the Council seek provision of a training and employment contribution to mitigate the loss of employment floorspace to be secured via a s106 Agreement. On the basis of a reduction of 31 full time employees, and based on Camden's formula, we calculate the employment and training contribution to be as follows:

31 full time jobs lost x 23% x £2,750 = £19,607.50

The vast majority of the buildings in the surrounding area are in office or educational use and therefore the change of use of the building to an educational use would be in keeping with the character of the area. Accordingly, it is considered that provision of a school in this location is considered acceptable in principle and in accordance with planning policy.

Amenity

Policy DP26 and emerging Policy A1 of the Local Plan seek to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Whilst we are aware of the neighbouring residential properties of 20 Bedford Place and 54 Russell Square, the proposals are not considered likely to result in any harm to the amenity of these adjoining occupiers.

The proposed development will have similar opening hours as that of the existing office. The proposals by their very nature are unlikely to impact on residential amenity and the operating hours of a school use will be similar to that of the existing office. The hours of operation are as follows:

The school building will be open Monday to Friday from 8am to 8.30pm;

The school will be in operation from 8.30am to 6pm;

The school staff would be able to be on site between 8am to 7pm;

The school pupils' will be able to be on site between 8.30am to 5.30pm;

The cleaning company would work every evening (Monday-Friday) from 5.30pm to 8.30pm; and

The school is not planning to open at the weekend.

There are not currently proposed to be any extra-curricular activity outside the school opening hours of 8.30am to 5.30pm.

The Travel Plan submitted as part of the application shows that students of Years 11-13 will travel by foot or will be using public transport, in turn limiting any congestion which is associated with school drop off and pick-ups.

Any anti-social behaviour of pupils of the school, which is causing detrimental harm to amenity of neighbouring properties will not be tolerated.

Access and Transport

Camden's 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 Tottenham Court Road, Russell Square and Holborn tube stations in close proximity and the site benefitting from a Public Transport Accessibility Level of 6b (Excellent). It should be noted that the pupils of the new school will be of Years 11-13 and on this basis pupils will travel to the school by public transport. Accordingly, there will be no impact on the surrounding road network.

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.

It is proposed to provide 12 cycle parking space for staff and visitors within the rear internal courtyard of the building. There are three existing stands, with three new linked Sheffield-type stands proposed to be loose-laid within the internal courtyard. The loose-laid stands are considered appropriate as they are located in a secure courtyard and due to the listed nature of the building. This is set out within the accompanying Transport Statement.

The Transport Statement submitted in support of this application also assesses the impact of the proposals on the highways network. The Statement concludes that there will be no detrimental impact on the highways network due to the excellent opportunities to travel by modes other than the private car.

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.

Heritage Impact

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.*" Moreover Policy CS14 of the Core Strategy seeks to preserve Camden's rich and diverse heritage assets and their settings.

Development Policy DP25 stipulates that the Council will only grant permission 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.

Policy D2 of the emerging Local Plan seeks to preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Development which causes harm to the significance of a conservation area will not be permitted unless there are public benefits to the development that outweigh that harm, taking into consideration the scale of the harm and the significance of the asset. The Policy goes on to state that the Council will resist proposals for a change of use or alterations and extensions to a listed building where it considers this would cause harm to the special architectural and historic interest of the building.

52-53 Russell Square is listed Grade II as part of the terrace at 52-60 Russell Square, and located in the Bloomsbury Conservation Area. The buildings have been extensively altered and linked over time, and are now effectively one building. Despite alteration, they retain special architectural or historic interest as listed buildings. That special interest derives from: their typology as terraced Georgian houses; their association with James Burton and the Bedford Estate; the corner location of No. 52; their overall appearance, scale and proportions; their elevational design including the nature, distribution size and proportions of fenestration; their use of traditional materials, their Georgian plan form (where it survives); their original internal materiality and detailing (where it survives); and later interventions of significance such as the addition of terracotta at the end of the 19th century.

The planning application is for a change of use. The physical alterations proposed in connection with that change of use are minor. They have been assessed in terms of their effect on the special architectural or historic interest described above. They have no effect on that special interest. They therefore do not require listed building consent, the requirement for which is set out in S.7 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act states that 'Subject to the following provisions of this Act, no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised'.

The NPPF applies substantial weight to the conservation of heritage assets by ensuring that they are kept in a 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 office use to non-residential institution use will ensure that the building is preserved in a viable use that is attractive to a prospective tenant, who already makes a positive contribution to the local economy and local community and will be able to continue to do so.

Accordingly, it is considered that the proposals are in direct accordance with the NPPF, and Policies CS14 and DP25 of Camden's planning policies and PolicyD2 of the emerging Local Plan.

Sustainability

Policy CS13 of Camden's Core Strategy seeks to tackle climate change through promoting higher environmental standards.

Development Policy DP22 requires non-domestic developments of 500sqm or more to achieve at least a 'very good' BREEAM rating and "excellent" from 2016.

Policy DP23 requires developments to reduce their water consumption and pressure on the combined sewer network.

Policy CG1 of the emerging Local Plan requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

An Energy and Sustainability Statement has been submitted alongside this planning application which outlines the approaches that will be taken to ensure that the development follows the steps in the energy hierarchy and will meet all the sustainable requirements of Camden's planning policies, where appropriate and viable.

Any opportunity to improve the BREEAM rating of the building is substantially restricted by the building's Grade II listed status. The sustainability report submitted with the application shows that the proposals target a BREEAM rating of 'very good'. Whilst policy requirement is for "excellent", it is only "very good" that is achievable due to the listed nature of the building and the constraints of working with an existing building. The Sustainability/Energy Statement submitted with the application does not include any works which would alter the interior or exterior of the listed building, including only like for like replacements.

Accordingly, it is considered that the proposals accord with the relevant London Plan Policies, Camden Policies CS13, DP22, DP23 and emerging Local Plan Policy CG1, and should be considered acceptable.

Summary

The application proposes a change of use of 52-53 Russell Square from office (Class B1) use to non-residential institution (Class D1) use. The proposals will not result in any internal or external changes to the building. The proposed use is therefore in keeping with the Grade II listed status of the property and will ensure that the historic building is retained within a viable use in accordance with the NPPF.

Whilst the proposals will result in the loss of employment floorspace, the existing floorspace is not considered suitable for continued business use, which has been substantiated with marketing evidence. The change of use to an educational facility, which is also considered to provide a significant number of jobs, as well as providing facilities for the local community, is considered to be in direct accordance with policy.

The Bloomsbury Area is characterised by a mix of uses including a number of colleges and universities, hotels, offices and residential units. The school will operate within similar hours to the existing office use and accordingly it is considered unlikely that there will be any resulting detrimental impact on amenity.

The site is highly accessible by public transport in accordance with the objectives of Policy CS10 and DP15 and it is anticipated that most pupils will arrive by foot or public transport meaning there will be no resulting impact on the local road network. Furthermore, 12 cycle parking spaces are proposed to be provided for visitors and staff.

The proposed use is targeting a BREEAM level of "Very Good".

Accordingly, it is considered that the proposed change of use is in accordance with planning policy and should be considered acceptable in principle.

Application Documentation

Please find enclosed the following documents submitted in support of this application:

- A copy of this cover letter;
- A site location plan at 1:1250 scale;
- Existing and proposed plans;
- Design and Access Statement;
- Office market report;
- Energy/sustainability statement;
- Transport Assessment; and
- Travel Plan.

We trust that you have all of the information you require in respect of this application. Should you have any queries or require any further information please do not hesitate to contact Hannah Bryant (020 7333 6427) or Emily Barnard (020 7518 7256) of this office.

Yours faithfully



Gerald Eve LLP

goliver@geraldeve.com

Direct tel. +44 (0)20 7333 6315