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2017/2285/P	Mrs Claire Maxey	3 clifton villas Clifton Villas W9 2PH W9 2PH	22/05/2017 14:33:51	SUPPRT	To whom it may concern I write in strong support of the application to convert 52-53 Russell Square into a school. Ecole Jeannine Manuel is an incredibly well-run school that takes community engagement and consideration for neighbours very seriously, which is something that I have observed as a parent to 2 children attending the school at its current Bedford Square address. More broadly, cementing the presence of Ecole Jeannine Manuel in the area would be a complete boon for the neighbourhood, since the school attracts highly educated, open-minded, 'good citizen' families. In addition Ecole Jeannine Manuel is strongly committed to maintaining the school infrastructure in pristine condition, contributing to a pleasant environment for all. The possibility for Ecole Jeannine Manuel to have a second site close to its current location on Bedford Square would be hugely beneficial to pupils and teachers alike, since they would be able to walk between the two campuses. I hope that this complete 'win-win' (local community and Ecole Jeannine Manuel) application can be viewed favourably, as it deserves to be Kind Regards Claire
2017/2285/P	Antonin de Margerie	42 albert st	21/05/2017 22:00:31	COMMNT	As a resident of Camden as well as having my two sons attending Ecole Jeannine Manuel, I am very supportive of the change of use for this building lot. Ecole Jeannine Manuel has established a stellar reputation in France thanks to its innovative education methods, its international value and the continued desire to always improve. The opening of their London school 2 years ago was the first step of building a similar story in the cosmopolitan UK. They have been successful in this launch. I am amazed by the balance of pleasure, work and learnings that the team has put in place. It reflects in the attitude of my 2 sons who are in love with their school. The implantation of the school has solid roots, good momentum and therefor is here to stay. It will bring back to the community through increased exposure to an international community, increased social and cultural mixity in the area. As a Camden resident, I believe this is a great opportunity for the city to host and support this new-born institution. Antonin de Margerie
2017/2285/P	Dom Huou	8 Ordnance Hill London NW8 6pX	22/05/2017 21:27:29	SUPPRT	At long last a positive project that will bring some life in the neighbourhood - adding educated and multicultural youth (and their families) in our neighbourhood
2017/2285/P	Camille Cattet	22 Cleveland Square	16/05/2017 18:34:55	SUPPRT	I fully support this school application. I'm sure that this school, well known for its quality of teaching and the good behaviour of its students, will have a positive effect on the neighbourhood.

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2017/2285/P	Cargill	Flat 101 St Mary's Mansions W2 1SY	19/05/2017 15:58:46	COMMEMPER	A bilingual school with international pupils should be a plus in this area. Strict behaviour policy promote well behave students in this school.
2017/2285/P	Ruth Gonzalez-Concepcion	8 Ordnance Hill London NW8 6pX	22/05/2017 21:36:08	COMMNT	The recent implantation of the school in London was a success from day 1. The very moto of the school (promote international understanding through the bilingual education of a multicultural community of students) could possibly be better aligned with what London - and more specially Camden- is all about, and why it acts as a magnet to people from all walks and places in the world.This will help rejuvenate our borough, bring additional resources and diversity - all with the added benefit of adding to our educational offering at no cost to Camden. The implantation in Bedford square has shown they managed to integrate seamlessly whilst contributing very positively indeed to the community.
2017/2285/P	Isabelle Brodeur	1 Albert Embankment Parliament View Apartments London SE1 7XL	16/05/2017 11:35:37	SUPPRT	This is a wonderful project and it is a great contribution for the community.

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2017/2285/P	Bob Osborne	Flat 2 54 Russell Square WC1B 4HR WC1B 4HR	21/05/2017 16:32:09	OBJLETTER	PDF of letter and other submissions sent by email to planning officer. I wish to attend committee and speak if this is not refused outright. I write on behalf of residents of all 5 flats at 54 Russell Square, the immediately adjacent residential property to 52-53 Russell Square. Our building shares a party wall with the property. All 5 sets of residents are completely opposed to this proposal and suggest that the proposal for a change of use put should be completely rejected for the following reasons: • A change of use is unnecessary at this time and the Loss of Office report misrepresents the position. Overall, this proposal is counter to Policy DP13 in that it does not demonstrate that the site or building is no longer suitable for existing business use and we understand that the estate has specifically NOT yet carried out a review to 'fully examine the possibility of retaining, reusing or redeveloping the site for similar or alternative business use over an appropriate period of time' The submission was started over two years ahead of the lease becoming available in 2019 and there is thus plenty of time for alternative uses to be properly considered in line with Camden policy. This application should be rejected outright because it directly contravenes Policy DP13. • Noise will greatly impact the day to day lives of all the families and residents whose 5 homes share a thin party wall with the proposed school. This will be a major impact on their amenity. Contrary to the statement made in the proposal all these homes are likely to be occupied while the school is active.. • The proposal will generate substantially more traffic congestion and pollution than the transport report suggests. There is already a major traffic problem in Russell Square and this proposal would make a bad situation far worse. • The proposal states that there will be no changes made internally or externally. This must be untrue. There will have to be major changes to the Grade ll listed building to accommodate a school, provide sound proofing, provide catering, and many other resources that a modern full curriculum secondary school needs. This proposal should be rejected because it is clearly misleading on the level of change that would be needed. • There are very serious fire, safety and security issues which are not addressed. • There will be an significant loss of jobs within Camden – halving the number of employees at the site. 1. Background The southerly row of houses 52-58 were originally built as residential property in approximately 1806. Over the years, they have been used as a mix of residential and office accommodation. They are currently used as office accommodation. Institutions and public bodies such as the Mathematics Institute and other organisations have made good use of these buildings and could continue so to do, but they are entirely not fit for use by a secondary school with 180 youngsters. 2. A change of use is entirely unnecessary and counter to Camden planning priorities Our first point is that a change of use is completely against policy DP13 which states that: the council 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

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possibility of retaining, reusing or redeveloping the site for similar or alternative business use has been fully explored over an appropriate period of time.
The Loss of Office report was commissioned by the school (not Bedford Estates, the Landlord) and obviously is designed to support the application. It was commissioned when the property had only been on the market for a short while – and fully two years before a new lease is needed. Clearly discussions started between the school and the Estate in 2016 and agreement was very quickly reached that a change of use should be sought. It would appear that there has been no significant marketing for this as a major landmark HQ building with a new lease from 2019. All that exists outside the building is one small sign that says 'Offices to let'. This is hardly a major marketing campaign selling the benefits of the site and the building. The brochure simply lists the possibility of a new lease – again with no copy selling the attractive features of this building or the location.
Alternative use has emphatically NOT been fully explored over an appropriate period of time. WE understand that Bedford Estates would undertake such an review only if this application is unsuccessful. They said specifically that "In the event that Ecole Jeanine Manuel were to be unsuccessful in securing planning consent for use of the building for educational purposes, the Estate would undertake a review of the building. Any such review is likely to include a consideration of letting the property as an office building and a consideration of alternative uses for the building".
To suggest that it will be impossible to let existing office buildings in Russell Square, Bedford Square and the surrounding area and that all such buildings as their lease comes up will need to apply for change of use does not sound supportable. It would mean every similar building will need a change in use and result in the loss of not just 50% of the jobs at this location but a significant loss of employment in the area to Camden and the biggest transformation the area has seen since the early and mid-nineteenth century when the area moved from predominantly residential to office use.
Further, if there were to be a change of use, it should surely be to residential since this is a priority need for the area and a key Camden planning priority. It would be more in keeping with the nature of the property.
Overall, this proposed change is counter to Policy DP13:
- It has not been demonstrated that current use is impossible. The property has had only minimal marketing and the application has been started over two years ahead of a tenant being needed.
- The Estate have not yet carried out a full review exploring current office use and alternative use and we understand that they will do this only if planning consent for this change of use is refused. Current and alternative uses have therefore emphatically NOT been 'fully explored for an appropriate period of time'.

Camden should reject this application in line with policy DP13.

3. The building is entirely unfit for use as a school building and represents a fire hazard
The building is entirely unfit for use as a school for over 200 staff and students. It is an historic building with original plaster and lathe wall linings and ceilings. The floors are timber with separate ceiling and floor supports which results in substantial voids in the floor

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construction again providing a concealed route within which fire can spread very quickly. The internal walls are similarly timber stud and lined with lathe and plaster again providing a fire route though the internal void spaces. This would represent a major fire hazard for this number of people. The building has one narrow twisting central staircase serving the four floors and an emergency escape through our loft space – which under the terms of our lease is used for storage. Whilst this escape may be just about workable for the current office workers, it must be very suspect for a school of 200 young school students. With the historic fabric having inherent compromises it is considered that young lives should not be exposed to these risks. There is no external space for the children to be accommodated on the site and Fire Drills are likely to be required on a regular basis and it would be further dangerous to have 200 distressed students discharging from the building directly onto the busy roads that surround the building and the Square.

The building meets none of the criteria that one would expect for a modern secondary school which should offer configurable teaching spaces, be bright and modern, with open spaces for students, good catering facilities, drama spaces, CDT facilities, science labs, sports facilities, ready access to safe spaces for students to meet and on a site of its own where students should feel safe when they step outside the school.

Specifically on the fire risk, planning permission should not be granted until a full report on fire safety has been commissioned and it is confirmed that the building is safe in its current layout for occupation by 200 students. If it is not, the changes necessary to make it safe should be stated and considered against Heritage guidelines.

If the building falls short of being ideal for office use, it surely falls far, far shorter on suitability as a secondary school. This is an entirely inappropriate use for a Georgian building of this type.

4. The statement that 'The proposals will not result in any internal or external changes to the building' cannot be true. To be used as a school, the building will require very significant building changes.

It is a complete misrepresentation to suggest that the building will not need to be altered to be used as a school. There are a myriad number of issues that will need to be addressed from public areas through to toilets and catering. The proposal will result in the occupancy numbers going from 50 to over 200 – a fourfold increase – so either the current building had four times the facilities it needs, or significant changes are needed.

Further, when this school took occupancy of the site they currently occupy in Bedford Square they immediately made changes to the school without permission – so they have a track record of ignoring planning regulations.

If the school is to offer a modern curriculum in to a high standard for students aged 11-18, all sorts of special facilities will be need. It cannot be the case that the existing office building can meet these needs without change. Where are the Science labs for A level or equivalent science? How will CDT be delivered? Are toilet facilities adequate? How will catering be delivered? On all of these issues the proposal is silent – but the school will surely need to address these issues if it gets change of use approval and these are bound to need significant alterations.

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The school should be required to state clearly all the alterations that are needed to turn this building into an efficient secondary school building before change of use is granted so that planning can make an informed decision on the impact of this change on Heritage considerations. The attached 'Building Guidelines' could perhaps serve as a standard against which this might be judged. (attached DFE Building Bulletin 103).

5. The school would greatly increase traffic congestion and pollution in Russell Square- and make a bad situation even worse – see also attached traffic survey.
The transport report submitted in support of the application is, in our view, entirely misleading. It suggests that vehicle trips will remain at much the same level and proposes this through a theoretical analysis. The reality is that the school in Bedford Square has many students being dropped off by car in the morning and picked up in the evening. They block the road and park illegally and the school makes little effort to manage the situation. There is virtually no vehicular traffic for the current users of 52-53 Russell Square at any point during the day.

Photos show the level of traffic chaos caused by parents dropping off in the morning.
Rather than a theoretical analysis, there should be an actual survey of the drop off numbers at the Bedford Square site at the start of the school day and a similar survey of vehicle drop offs at the same time period at 52-53 Russell Square. We attach as an appendix a survey undertaken on the morning of 12th May by us.
Whilst the school states that it will use the site as a secondary school, this usage cannot be required by planning – and so any planning judgement must be made on the assumption that one possibility is it could be used in exactly the same way as Bedford Square – which is chaotic – see separate traffic survey.
Catering arrangements.
The application is silent on catering arrangements – and yet 200 students will need to be fed each day. It would be reasonable to assume that the same arrangements may pertain as in Bedford Square: dining area with prepared food brought in daily by truck. There is nowhere on the plan for communal eating areas and therefore changes will need to be made which are not revealed in this planning application. At Bedford Square, their supplier is Whole Foods and the waste is removed at 10pm daily by First Mile. There appears to be no provision shown on the proposed drawings for refuse storage so the mountain of bags will be left on the footway. The trucks will have to unload food into the building as they do in Bedford Square causing further congestion and disruption for residents.
Actual data of the congestion caused by the school currently should be used for the purposes of any comparison with current office use rather than a theoretical analysis. It cannot be the case that will be no change in traffic as this proposal suggests.
6. It would greatly affect the amenity of residents of adjourning buildings with high levels of noise.
The building is now 200 years old and was original designed as a bachelor house and the party walls were therefore constructed between residential units where the noise levels were minimal. With the current office use when they occasionally have an event with many people this can be heard in this building. As an occasional event this is tolerable, but to have this all

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day every day it would not be the case.
There are 5 residential flats in 54 Russell Square occupied by couples past retirement age. All are occupied during the time the school will be open. The peace and calm of the setting is a right guaranteed by their lease – that there will be no exceptional noise or disturbance. All the flats share the party wall with 52-53 and whilst quite office workers cannot be heard through the wall, large classes of 30 students engaging in active learning will surely have a massive impact on the peace and quiet within the main living rooms of most of the flats. Students will pound up and down stairs as they change classrooms. No amount of sound proofing is likely to be adequate and thus the 'quiet enjoyment' of the property that is currently enjoyed will be completely shattered.
This proposal should be rejected on the grounds of its impact on Amenity.

7. It would badly affect the immediate surroundings of 54 and 52-53 Russell Square. It is also likely to cause major disruption to the public in Russell Square itself.
Behaviour at school gates is notoriously noisy and impossible to constrain. Pavements are already blocked every day in at the school in Bedford Square and the situation will be even worse in Russell Square. Rubbish, often 2 meters high, blocks the pavement all evening in Bedford square.
Further, there is no school playground or space for students to gather and interact. Their only option will be the immediate vicinity – the steps and streets on either side of the building being particularly badly affected.
Russell Square is also likely to be badly affected – it is a public space used by thousands of visitors every week and if the school were to use it for students as they do in already in Bedford Square, it have a massive impact on an already very crowded Square.
8. It will reduce the number of jobs from this site by 50%
Currently about 54 full time staff are employed at the site. The school will employ half this number of teachers – thus losing 31 full-time jobs for Camden.

9. The school will not offer relevant or accessible educational benefits to the Borough. It does not offer the National Curriculum and will be working in buildings that are unsuitable and do not conform to the guidelines for Mainstream schools.
This is a proposal for a private school with annual fees of £16,410 offering bilingual education on the French Curriculum. The proposal makes much of the educational benefit of this school to the Borough but there are a significant number of reasons why this should be discounted.
Firstly the curriculum is not aligned with the UK National Curriculum. The school's mission is stated as: Our curriculum is based on an enriched version of the international sections programmes of the French Ministry of Education. Whilst this will be a choice for some – presumably French citizens working in the UK - it is highly unlikely to be something that a typical Camden resident would want for their child or something that would align with Camden planning priorities in Education.
The school charges annual fees of £16,410 which would surely mean that its benefits cannot be described as being available to the wider Camden community. Further, the submission confirms that 80% of students come from out of the Borough.

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The buildings must be completely unsuitable for use as a secondary school – particularly as the submission states that there will be no internal or external alterations. This point is already covered more fully in point 4 above – but is obviously relevant to planning priorities in Education where the Borough will want to ensure that Education takes place in suitable buildings.
When it moved into its present building in Bedford Square the school immediately made alterations without having secured planning position.
Conclusion
We strongly argue that this change in use should not be granted.
No change of use is needed and the proposal is counter to Policy DP13 since current use and alternative uses have not been fully explored over an appropriate period of time. It should therefore be rejected as against policy.
The building is completely unfit for purpose and will pose a major fire hazard which should be addressed before change of use is granted.
It will have a very significant noise impact on adjacent homes and so should be refused on grounds of impact on amenity.
It will bring a major increase in vehicular traffic and raises many safety and other issues and should be rejected on traffic impact grounds. It will make a bad problem far worse.
It will undoubtedly need major changes to turn this office building into an efficient secondary school having no impact on amenity. Because no detail of these changes is given, and indeed it is stated that no changes will be made, the application significantly misrepresents the situation and should be refused outright.

Bob Osborne
David Marchant
On behalf of residents of 54 Russell Square