



52-53 RUSSELL SQUARE
LONDON WC1B 4HP

PROPOSAL: CHANGE OF USE FROM OFFICE (CLASS B1) TO NON-RESIDENTIAL INSTITUTION (CLASS D1)

Application for planning permission: 2017/2285/P

27 May 2017

The Bloomsbury Association endorses the representations on this application made by neighbouring residents and wishes to make the following additional comments.

1. Whilst we acknowledge that this proposal concerns a strategic London-wide educational asset, we should point out that the local community was not informed and given the opportunity to comment prior to the application being submitted. Para 188 of the NPPF encourages applicants who are not already required to do so by law to engage with the local community before submitting their application and for good reason.

We did have the opportunity to speak with the school about their proposal on 26 May, after the consultation period had expired, and this has informed our comments that follow.
2. We note the wider school community has been informed about the application and many representations of support have been submitted by parents of pupils and by pupils at the school's existing premises in Bedford Square. With parental interest in a pupil's continuity through the school, it is a moot point as to whether these are 'public' comments or further submissions by the applicant but comments that are not relevant to the determination of the application should not be considered.
3. In principle, the Association welcomes a diverse mix of uses in the area that such a change of use would provide. The school does not meet local need, but we believe there could be local economic and social benefits should the school open up more to the community as is evident around Institut Français in South Kensington. However, there are related issues to do with intensification of use in Bloomsbury in one particular sector and some are of the view that, with the planned expansion of the University of London's campus on the other side of Russell Square, there could ultimately be too great a concentration of D1 use in one place.
4. Unless there is an appropriate '*use swap*' we would be concerned by the loss of business space, which is contrary to policy DP13 of the LDF. We are not convinced by the arguments put forward by the applicant's consultants that such premises are no longer suitable for continued business use when there are many examples in the area where the contrary is evident. Nevertheless, should the Council be minded to approve a change of use, this should be made personal to the applicant so it may revert back to the existing use in the future.
5. École Jeannine Manuel had a few problems settling into its existing premises in Bedford Square. Although benefitting from buildings that already had D1 use to a far lesser intensity (as a VAT Tribunal), there were issues with listed building consent, with the construction stages on fit-out and with vehicle management on initial occupation. As their first venture in London, they were not experienced with all the issues that accommodating a school in Grade I listed buildings in a sensitive setting could present. While most of these have now been overcome, we think it fair to surmise that an application for change of use in Bedford Square may have been refused planning permission, principally for reasons to do with a significant issue that has not yet been

fully resolved: traffic generation and its management. This could become worse as the school grows and on implementation of the Council's West End Project.

The school is a considerate neighbour and has worked hard to manage these issues in liaison with the Council and adjoining residents. Officers are referred to their colleague Jacqueline Saunders for a better understanding of how this has worked. We have urged the school to submit a draft of their revised Travel Plan for Bedford Square so the school premises can be considered as a whole.

6. The Bedford Square school is currently served by five coaches that deliver pupils to the school each morning and collect them each afternoon. We understand this number will decrease to four in the coming year. Pupils also arrive and depart in substantial numbers in parents' cars, by chauffeur driven cars, by taxi or on foot. In addition, coaches take pupils to facilities off-site during the day or sometimes pupils may walk. The school is a high traffic generator, both vehicle and pedestrian.

In addition, food and beverages are also delivered by trucks daily and refuse taken away through a contract with First Mile. The school generates a lot of refuse each day.
7. Transportation issues are a major concern in Russell Square for, while the school may currently intend the proposed accommodation for a senior school and this may be limited by the terms of their lease from Bedford Estates, this may not be the case in the future. Any change of use cannot, we believe, constrain the type of school use the buildings can be put to. So, whereas a senior school might assume a higher number of students arriving by public transport rather than coach and therefore vehicle generation is less, there is no guarantee this may be the case for the length of their occupation so transportation impact should be judged on a par with characteristics of the school's accommodation already in Bedford Square. Whereas there may be economies of scale in sharing some services between the two locations, this could also generate some movement at times between them in various modes. The Transport Statement accompanying the application is deficient in making no reference to any of this. We suggest that it should because Russell Square cannot be considered in isolation from the school in Bedford Square.
8. We are skeptical of the conclusions reached by the Transport Statement. It is not credible that a school of 180 pupils, 10% of whom are expected to arrive and leave by private car, can have a lesser traffic impact than the existing office premises whose staff are fewer in number and all travel by public transport. Equally, given the requirements of LDF Policy DP32, consideration needs to be given to the desirability of 18 cars arriving to drop-off and pick-up students from the school in the morning and afternoon peak periods each day on roads that are already seriously congested and in close proximity to an existing bus stop.
9. We understand that the proposal will result in the displacement of 40 current secondary admissions from the existing school premises, which in turn could effect a greater traffic impact in Bedford Square as pre-secondary admissions increase correspondingly. This could be compounded by what we understand to be a planned 50% increase in the number of pupils in Bedford Square over the next two years to increase the school population there from 297 to 450 with an overall total of 630 pupils. This is a degree of intensification of use across the Bloomsbury school 'campus' that needs to be brought under planning control and any potential harmful traffic impacts managed. Again, the Travel Plan for all the school's premises needs to be considered rationally, as a whole.
10. Additionally, there are other issues that flow from the proposal that need to be considered, which we see as follows:
 - On-street vehicular servicing;
 - Refuse storage and collection – a refuse management plan needs to be submitted for consideration;
 - Vehicle trips for pupils to facilities out of school;
 - External noise impact on neighbouring residential uses contrary to LDF Policy DP28;
 - Internal noise impact on neighbouring residential uses arising from sound transfer through what we understand to be a poorly constructed party wall and the feasibility of carrying out internal alterations to the listed building to meet any deficiencies;
 - Inadequate provision for means of escape in case of fire and toilet accommodation given the

increase in occupancy and the feasibility of carrying out internal alterations to the listed building to meet these deficiencies;

- Suitability of provision for inclusive access and the feasibility of carrying out internal alterations to the listed building to meet any deficiencies;
- The application suggests there will be no changes required to the building to meet such deficiencies, which is misleading – Building Regulations compliance may be unachievable for the design proposal shown in the drawings;
- Lack of any on-site external activity space and the appropriateness of public open space in Russell Square, Bloomsbury Square or elsewhere for pupils' recreational use given the shortfall in public open space provision that has been identified in Camden's Core Strategy;
- The adequacy of space for congregation outside the school;
- The adequacy of cycle parking provision;
- Implications of LDF Policies DP15 and DP26 that new community uses and new development should not harm residential amenity, the environment or transport networks;
- Implications of Policy 7.14 of the London Plan concerning development likely to be used by those particularly vulnerable to poor air quality, such as children in an area with high levels of pollutant emissions.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Jim Murray
Chairman
On behalf of the Bloomsbury Association

Copies to:

Councillor Adam Harrison, London Borough of Camden
Councillor Sue Vincent, London Borough of Camden
Rob Tulloch, London Borough of Camden
Jacqueline Saunders, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Steward, Bedford Estates
Local residents
Chair, Bloomsbury Association