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**FAO: Rob Tulloch**

7 June 2017

**Our ref: GAO/HBR/EKB/J7860**

**Your ref:**

Dear Sir

**52-53 Russell Square, London  
Objection Response Letter**

We write on behalf of our client, Ecole Jeannine Manual, in response to an objection letter received from the residents of 54 Russell Square.

There are a number of matters raised in the letter of objection that were of concern to our client and accordingly a letter of response is provided to clarify matters. We will deal with each point in turn.

It should be noted that our client met with the residents as well as the Bloomsbury Association to discuss the proposals on 26 May 2017. The discussions are referenced within this letter.

### **1. Change of use is unnecessary and against planning policy**

The objection letter states that the Loss of Office Report was commissioned by the Applicant rather than the Landlord, the Bedford Estate, and therefore cannot be relied upon. It should be noted that the Loss of Office Report was prepared by Gerald Eve LLP who are the Bedford Estate's predominant property consultant. Accordingly, the purpose and instruction of the report by the Applicant was discussed and agreed with the Estate prior to the submission of the planning application.

The objection letter goes on to state that the Report was commissioned two years prior to a new lease being needed. As I am sure you are aware, the Estate owns a significant number of properties within the Bloomsbury area. As a property owner and manager the Estate review and market properties on a regular basis, and always well in advance of the end of a lease. This is standard practice within the property industry as it reduces risk and ensures that void periods are kept to a minimum. Notwithstanding this, and whilst the current tenants' lease does not end until 2019, the current tenant has a break clause shortly and has advised the Estate that they wish to surrender their lease. Accordingly, the Estate and the current tenants have been marketing the property for office use to let the property as soon as possible. The Estate's preference would be for the use of the property to remain office (Class B1). However, and unfortunately, the marketing of the property for an office use has been unsuccessful. Accordingly, the Estate is considering the conversion to an educational use.

The objection letter goes further to state that the property should be marketed as “a major landmark HQ building”. It should be noted that the subject property is only 1,388sqm in size. Accordingly, it is only suitable to be occupied by a relatively small scale business and therefore unlikely to be considered a suitable location for a company’s headquarters. Furthermore, and as set out in the Loss of Office Report submitted with the application, the configuration of the property, which is heavily segregated and convoluted, is detrimental to the functioning of an office. The majority of office occupiers seek an open plan environmental for their business. This desire is based on a philosophy that staff will collaborate better in this sort of environmental.

It is noted that the objection letter refers to the marketing of the building simply being “one small sign that says ‘Offices to let’”. This is incorrect. As set out in the Loss of Office Report, the marketing agents have:

- Hosted an agent launch covering both West End and City agents, the purposes of which were to ensure that as many advisors who represent tenants are aware of the opportunity;
- Produced marketing particulars;
- Circulated information to reach the widest audience on:
  - WestEndAgents.com
  - CityAgentsClub.com
  - EGi
  - CoStar
  - Realla
  - A variety of social media including Instagram and Twitter

The objection letter goes on to quote the Bedford Estate regarding the undertaking a review of the building. The quote provided has been taken out of context and it is not confirmed who this quote was provided by. As set out above, the property has been marketed for office purposes and the marketing campaign has been unsuccessful. Any review of the building, is likely to refer to a change of use of the property to alternative uses, other than office and educational uses, which have already been reviewed by the Bedford Estate.

The objection letter refers to a change of use of the property being more appropriate to be a residential use, however, the policy states 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 uses or community uses”. In this case, the proposals are for a school. At paragraph 15.2 Camden’s Development Management Policies define community facilities as including “childcare facilities, all educational and training facilities, healthcare facilities, policing facilities, youth facilities, libraries, community halls, meeting spaces, places of worship, public conveniences and other use in Class D1 that provide a service to the local community”. Accordingly, it is considered that should the Council accept that the loss of office in this location is acceptable, change of use to a school is appropriate.

## **2. The building is unfit for use as a school and represents a fire hazard**

It should be noted that Ecole Jeannine Manual currently run a primary up to Year 11 school from 43-45 Bedford Square, which is Grade I listed. The Applicant has operated the school with no detrimental impact on the listed building and it is considered that this will also be the case in respect of 52-53 Russell Square which is Grade II listed.

Since the issue of the objection letter, the Applicant has met with the Bloomsbury Association and two representatives from the residents of 54 Russell Square to discuss their issues with the planning application. The Applicant has also asked their building control consultant to advise on the

fire escape from the top floor of the building which was raised within the objection. The building control consultants' letter is attached at Appendix 1 and should form part of the application submission. The letter advises that whilst there is an emergency exit through the neighbouring building, in the event of an emergency, only the occupants of the fourth floor would use this exit. Occupants of the fourth floor would be exclusively adults as the fourth floor as it will comprise of a staff room and a conference room, used intermittently and rarely at full occupation.

Students located in classrooms at lower levels will never use the neighbouring property for emergency exit. Moreover, since the safeguarding of pupils is the main objective of all adults in a school, the adults on the fourth floor will in almost all foreseeable circumstances, move down to assist in the evacuation of pupils, rather than exit through the neighbouring building.

### **3. Internal and external alterations**

The objection letter suggests that the Applicant is not aware of the permission and consents required for the proposals. As the Applicant's planning consultants we can confirm that they are aware, and being advised, of any permissions or consents required for any works proposed.

The planning application that has been submitted is for a change of use of the building from office (Class B1) to a school (Class D1). Should any further details or applications be required for internal or external alterations, they will be applied for through the appropriate submissions to the Council, or dealt with by way of condition, and will be determined on their own merits.

### **4. Impact on traffic congestion and pollution**

The objection letter states that the Transport Assessment submitted with the application is "entirely misleading" as it is based upon "theoretical analysis". However, in the lieu of the school actually being up and running, it is difficult for the Applicant to provide anything but theoretical analysis.

Notwithstanding this, following discussions between the Applicant, the local residents and the Bloomsbury Association, it was noted that a Travel Plan covering both the existing school on Bedford Square and the new school on Russell Square would be helpful. Whilst the Bedford Square Travel Plan is independent from any Travel Plan for Russell square, in that it will evolve regardless of whether future older pupils study at Russell Square or elsewhere, the Applicant has agreed that it will undertake its own survey of the existing school, collecting data from staff and pupils of the school on Bedford Square. It is anticipated the survey data will be collected by 9 June and that the information can be provided to Camden officers by 16 June. It was agreed with the Bloomsbury Association that this would be an 'illustrative submission example' rather than a formal Travel Plan relating to the Bedford Square school. The Applicant will continue to work closely with Camden's School Travel Plan officer to improve their school Travel Plan.

Our client has undertaken a review of the existing school at Bedford Square, and confirms the following:

- Of the 29 pupils within Year 7 of the school, 8 take the school bus in the morning and 12 take the school bus in the evening.
- Of the 32 pupils within Year 8 of the school, 7 take the school bus in the morning and 3 take the school bus in the evening.
- Of the 15 pupils within Year 9 of the school, one takes the school bus and 14 use public transport.



It is proposed that pupils from Years 11-13 (ages 15-19) will be located at 52-53 Russell Square. Accordingly, and on the basis that the majority of those students within Year 9 already use public transport, it is anticipated that the majority, if not all, of the older pupils being taught at 52-53 Russell Square, will use public transport. It should also be noted that a school bus is not proposed as part of the Russell Square transport arrangements.

The Applicant is also willing to work with Camden and the pupils' parents to better manage the drop-off and pick-up activities. They can offer a member of staff to be on hand, supported by local PCSOs, to help manage parent drop-off and pick-up.

It also considered that a School Travel Plan, secured via a s106 agreement, specific to any new school at 52-53 Russell Square, would considerably help to manage the situation. Measures such as finding a suitable drop-off location from which pupils can be safely walked to the site will reduce the potential for inappropriate parking.

Notwithstanding this, and in any event, outside the existing school on Bedford Square, the street is narrow, and one-way, with marked out parking all along one side. Any stationary vehicle in the carriageway would therefore block the street. In comparison, Russell Square, outside the proposed site is a wide, two lane two-way carriageway where traffic could still pass a stationary vehicle. Furthermore, the new site also adjoins Bedford Place which is also a wide two-way carriageway. Bedford Place also has a small length of kerb where parking would not interfere with two-way traffic (although this section does have Double Yellow lines). Accordingly, it is considered that the highway arrangements at Bedford Square exacerbate the transportation arrangements, which do not exist outside the Russell Square property.

We note the comments raised by the residents in respect of servicing and refuse. It should be noted that it is not proposed to provide lunch for pupils or staff located at Russell Square. Therefore there will be no food deliveries. Students and staff will have areas designated for lunch should they wish to bring their own. It is anticipated that the removal of refuse from the school will be undertaken by providers who are compatible with, or the same as those that serve neighbouring properties, so as not to create an increased impact on the local transport infrastructure. Should a more detailed refuse and servicing plan be required, it is considered that this can be secured by condition.

#### **5. Impact on amenity of adjoining buildings with high levels of noise**

The objection letter states that the proposed change of use to a school will have a detrimental impact on the noise amenity of the neighbouring residential properties. It should be noted that the school will only operate during daytime hours (between 8am-6pm). Accordingly, whilst some noise is likely to be generated by the pupils it will only take place during hours when it is anticipated the majority of residential occupiers will be awake in any event.

Furthermore, other than outside the front of the school, when pupils arrive and leave, any noise from pupils will be contained within the building and is unlikely to equate to exceptional noise and/or disturbance.

Notwithstanding this, our client has offered to provide sound insulation to the party wall between 53-52 and 54 Russell Square to minimise any potential impact. This would be subject to agreement with officers and any necessary listed building consent.

## **6. Impact on the immediate surroundings**

The objections raised have been covered above within section 4.

## **7. Reduction in number of jobs**

As set out above, the building has been marketed as an office and no tenant has been found. Accordingly, whilst an educational facility does not technically fall within a “business” or “employment” use, the proposed school will still generate employment and it is proposed to employ 23 full time staff at the building. Whilst the proposals result in the reduction in number of employees on site, the reduction is considered marginal.

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

We consider that the contribution to local employment and training helps to mitigate the reduction in jobs on site.

## **8. Accessible educational benefits to the Borough**

The proposed school offers education to students from international backgrounds, of which there are many within London. Whilst the existing school, at Bedford Square, is also a French International school, it teaches 60 pupils who reside within the London Borough of Camden. It is anticipated that the proposed school will teach even more pupils who reside within the Borough.

You will note that there has been a significant amount of support for the application from the public. Many of the supporting comments that have been issued have been from those that live within the local area, and consider that the school will be a welcome addition to the community. In addition, the proximity of the school to many of the cultural facilities within Camden is of benefit to the pupils.

## **Summary**

This letter seeks to respond to concerns raised by the residents of 54 Russell Square, in their objection letter. In particular this letter responds to matters associated with the marketing of the existing property; fire hazards; internal and external alterations; traffic impacts; amenity; jobs; and Borough benefits.

For the reasons set out above, as well as those set out within our covering letter and accompanying documents submitted in support of the planning application, it is considered that the proposals are in accordance with planning policy and should be approved.

We trust that you have everything required to proceed with the determination of the application but should you require anything further from us, please do not hesitate to contact Graham Oliver or Hannah Bryant of this office.

Yours faithfully



**Gerald Eve LLP**

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