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FAO: Rob Tulloch

25 September 2017

Our ref: GAO/HBR/J7860

Your ref:

Dear Sir

52-53 Russell Square, London Objection Response Letter

We write on behalf of our client, Ecole Jeannine Manuel, in response to two objection letters received from Planning Porta on behalf of the residents of 13-16 Russell Square (Bloomsbury Mansions) and 54 Russell Square dated 1 September 2017 and 7 September 2017.

Whilst the letters raise concern regarding the impact of the proposals on the amenity of the residents, our response to these matters was covered within our previous objection response letter dated 7 June 2017 and accordingly we would direct you towards this previous letter and therefore do no reiterate our comments.

We will deal with the letter dated 1 September 2017 first.

It is worth noting, before we deal with the more detailed points raised within the letter, that the letter states that the Bedford Estate might have a conflict of interest in respect of the developments proposed and the implications that they have on the garden squares that they own. We consider that this is incorrect and would go so far as to say that the position is in fact the opposite. Due to the Estate's significant land holdings around the garden squares, within Bloomsbury, the Estate have a vested interested in the impact of development on the area. As part of the Estate's role, they are constantly re-assessing the mix of uses they have across the Estate, whilst seeking to ensure that the special interest of their historic buildings and garden squares, are preserved for the future. Accordingly, we would refute this point. It is also worth noting that Simon Elmer, the Steward of the Bedford Estate, is a member of The Commissioners of Russell Square group but was not party to the objections raised by the Commissioners via Alan Train at the University of London.

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.

Whilst the objection letter states that the proposals ***"will not support the provision of floorspace available to support businesses and employment growth in Camden"***, it is important to note that the floorspace has been marketed for office (Class B1) use but there has been limited interest in letting the floorspace. The proposals will result in the change of use of the property from

business floorspace to educational floorspace. However, the education floorspace itself will provide employment so we consider this point to be factually incorrect. The objection letter states that the proposals do not meet part (g) of Local Plan Policy E1, however this part of the policy relates specifically to Camden's industries, rather than offices, and is therefore irrelevant in the context of the proposals.

Whilst we appreciate the points raised within the letter with regards to the need to provide a range different types and sizes of business floorspace, as we set out within our application submission, the premises at 52-53 Russell Square do not appear to meet a specified need which is shown by the limited interest there has been in the property for use as an office (Class B1). Furthermore, the objection letter quotes Camden's Employment Land Review in respect of the demand for office floorspace but fails to quote the full sentence. The letter states ***"the demand for offices will increase by 695,000sqm between 2014 and 2031"***.

What the Employment Land Review in fact says is that ***"our demand forecasting exercise found that LB Camden is expected to experience demand for approximately 695,000sqm of office floorspace for the period 2014-2031. The majority of office space demand is expected to be for large, high quality offices in Midtown area, in and around King's Cross, Euston, Tottenham Court Road and Holborn, as the expectation is that central London office market will continue to grow in importance."*** This is a pertinent point and is in accordance with the Loss of Office Report that we submitted with the application.

The objection letter states that in order for a change of use from existing business use to be considered acceptable, it is necessary to demonstrate that there is no realistic prospect of demand to use the site for an employment use, including marketing evidence. Whilst this is true, there are also other criteria which the Council should take into consideration. One particular criterion that the objection letter fails to mention is whether the premises are in a reasonable condition to allow the use to continue. We are of the opinion that due to the poor appearance and state of the existing offices, significant refurbishment would be required to bring them up to a suitable market standard. This is therefore a material consideration to be weighed in the balance.

The letter states that the marketing information that was submitted with the application was not sufficient. As previously advised, it should be noted that the following marketing was undertaken:

- 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;
- Installed a letting board to target the local occupiers
- Tracked occupiers with relevant requirements
- Circulated information to reach the widest audience on:
 - WestEndAgents.com
 - CityAgentsClub.com
 - EGi
 - CoStar
 - Realla
 - A variety of social media including Instagram, LinkedIn, Facebook and Twitter.

The objection letters states that the Loss of Office Report contains details of accommodation available within the Fitzrovia and Bloomsbury area but does not reference where the information has been obtained from. This information has been independently researched and sourced from various agents. We enclose with this letter a copy of the availability report which, if you total up the

available floorspace under each property, totals the figures summarised within the Loss of Office Report.

The objection letter states that new developments with large floorplates are likely to be unsuitable for start-ups and small to medium sized enterprises. However, the objection letter fails to account for the fact that redevelopment of sites which are suitable for continued business use are required by the new Local Plan to make provision for floorspace suitable for start-ups and small and medium sized enterprises. Therefore provision within new developments will help to meet this demand.

The letter then goes on to state the marketing items that are required by paragraph 7.18 of Camden's Planning Guidance (CPG) 5 to be provided should the loss of employment uses be considered acceptable. We have listed out each of these items in the table below and clarified that in some form or another all of these items have been provided:

Information required by paragraph 7.18 of CPG 5	Provided?
Use of a reputable local or national agent with a track record of letting employment space in the borough.	The marketing exercise was initially undertaken by MB&A Commercial, a specialist in the Bloomsbury market, followed by Kinney Green who have 20 years of experience in this market and have let a significant amount of employment space within the borough.
A visible letting board on the property (constant throughout the marketing period).	A photo of the lettings board is enclosed with this letter. This has been in place since the marketing of the property began.
Marketing material should be published on the internet, including popular online property databases such as Focus.	Screenshots of the marketing material that has been published on the internet is enclosed with this letter.
Continuous over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed). We will consider shorter marketing periods for B1(a) office premises.	The existing office floorspace is B1(a) office for which shorter marketing periods may be considered. The property has been marketed since February 2016 which we consider sufficient for this type of use.
Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property.	Rents advertised are reasonable and reflect market rents in the local area as well as the condition state of the existing building.
Lease terms should be attractive to the market: <ul style="list-style-type: none"> - at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works. - and/or short term flexible leases for smaller premises which are appropriate for SMEs. 	The lease terms provided were flexible and the Bedford Estates were open to granting both short and longer term leases.
Commentary on the interest shown in the building, including any details of why the interest was not pursued.	The only interest in the property was from serviced office occupiers who the Bedford Estates were hesitant to give consent to as they felt they already had too much exposure to this sector within their estate. The Estate feels strongly that permanent occupiers of any use

	invite a stronger sense of community within the area. The only other interest was from those wishing to use the building for D1 uses such as Birkbeck University.
Where there is an existing employment use then we will require evidence that the tenant intends to move out.	The property is being marketed by the existing tenant's agents who are looking to exit their lease. This is set out within the Loss of Office Report submitted with the planning application.

We would also like to clarify the objector's comments in relation to the Bedford Estate's involvement in this matter. Whilst the Estate is willing to support the school in achieving planning permission for the change of use of the premises, as the Estate consider the school use to be valuable in terms of what it can add to the character and vitality of the area. The Estate was equally willing to retain the building in an office use, had the demand been there. There was limited interest in the property as an office use, and the school expressed an interest in the property for Class D1 purposes, therefore resulting in the submission of the change of use application. The Estate would like to see the change of use come to fruition due to the limited interest in the property as an office. To be clear, the fact that the Estate supports the use of the premises a school is not considered to be justification for the change of use.

It should be noted that in terms of the timings set out within the objection letter, discussions with school began in October 2016. A pre-application enquiry was submitted to the Council in November 2016. The property was marketed from February 2016 to May 2017 when terms were agreed with the School which is considered a sufficient period of time to market a property of this nature and use.

We will now consider the matters raised within the second objection letter dated 7 September 2017.

The objection letter raises concern with the way in which the Bedford Estate has dealt with the marketing of the property. For the avoidance of doubt and to clarify matters, The Bedford Estates has not been marketed the premises at 52-53 Russell Square. Kinney Green is the marketing agents and have been marketing the property on behalf of CIPR, the current tenants.

The Bedford Estates have not undertaken an appraisal to consider alternative uses of the building. This is an endless task and not something necessary for planning purposes. The existing use is office (Class B1). The property has been marketed as such but no tenant has been found. Ecole Jeannine Manuel was interested in leasing the property and accordingly an application for the change of use of the premises was progressed. It is worth noting that the office at 25 Bedford Square that the objection letter refers to is not comparable as it is almost a third of the size of the office at 52-53 Russell Square.

The Estate considers the school to be a positive use that will contribute to the existing mix of uses in the area whilst still providing a significant element of employment generation. This is in accordance with Policy E1 (i) which specifically states that Camden will recognise the importance of other employment generating uses including education. This is reiterated by supporting paragraph 5.33 which specifically refers to educational uses and the employment they can generate.

Furthermore, paragraph 5.40 is clear that community facilities, within which the proposed use will fall, are a priority use within the Borough. Whilst this part of the policy itself, which relates to redevelopment of sites that are suitable for continued business use, is not specifically relevant to

the application proposals, it does highlight that community facilities are a priority use within the Borough which should be taken into consideration in the determination of the application.

The letter goes on to state that a school is opening at 46-47 Russell Square and therefore there will be a proliferation of the same uses within the locality. It is important to note that The Bedford Estates also own 46-47 Russell Square. The property is occupied by CIEE who, whilst they are a teaching organisation, are not a school and this statement is misleading. It is also worth noting that the Bloomsbury area is well known as an area within which there are a number of educational and teaching facilities. We consider that the proposed use will complement and support the existing uses within this part of Camden.

We note the comments made by the objection letter in relation to fire evacuation. We covered this matter within our letter dated 7 June 2017. Fire evacuation matters are not controlled through the planning system. The proposals meet Building Regulations requirements and accordingly, no further comment is provided on this matter.

The objection letter states that the proposals are contrary to Policy D2 which seeks to protect the special architectural and historic interest of the building. The objection letter then goes on to state that the planning application submission is disingenuous as the submission states that the proposal would not involve any alterations to the property. This statement is correct. As set out in our letter of 7 June 2017, the planning application that has been submitted is for a change of use application. No physical works to the property form part of this application. Accordingly, the proposal does not result in any alterations to the property and therefore has no impact whatsoever on the special architectural and historic interest of the building. 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, and will be determined on their own merits. Ecole Jeannine Manuel is aware of the planning and listed building consent requirements and will seek the relevant permissions/consents, as necessary.

In regards to the matters raised in respect of traffic congestion, the permission will be subject to a Travel Plan which will be secured by way of a s106 agreement. Accordingly, this matter is not considered further within this letter as this is considered to be a sufficient control on transportation matters in relation to the school.

The objection letter refers to the students of the school being able to leave the premises at lunchtime and that they may use the Russell Square Gardens as a playground. Whilst the sixth form students will be allowed to leave the premises at lunchtime, all students of 16 and younger will not be able to leave the premises without parental permission as the pupils are the responsibility of the school during school hours. We are advised that parental permission is rarely granted for pupils of 16 or below to leave the school premises during the day. In respect of the older pupils, due to the academic nature of the school, pupils will be encouraged to undertake further studies on their lunch break including academic activities e.g. chess, homework or meetings with teachers etc. There will also be a lunch break area allocated within the building for the pupils to spend their lunch break. It is therefore anticipated that only a small number of sixth form pupils will leave the school during a normal school day.

The objection letter questions whether the proposed school could be considered a community facility. Paragraph 4.21 of Camden's Local Plan specifies that "community facilities" include education facilities. These facilities form a vital part of town centres and neighbourhoods and address the local community's needs. Simply because the school is a private school, does not mean that the facility is not classified as a community amenity. As is clear from the number of letters of support submitted for the application, including from Camden residents, there is a clear

desire for a new secondary school in this location. The school will bring families to the area which assists in helping to create a community within this part of Camden, significantly more than the existing office accommodation does.

We trust that this provides some clarity in relation to the matters raised within the objection letters and trust that the matters raised within this letter will be taken into consideration in the determination of the application.

If you have any queries regarding any of the matters raised within this letter, please do not hesitate to contact Graham Oliver or Hannah Bryant of this office.

Yours faithfully



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Enc:
Availability Report dated 13 September 2017
Photo of Lettings Board
Screenshots of Social Media Listings