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FAO: Rob Tulloch / Antonia Powell

11 May 2018

Our ref: GAO/HBR/EKB/J7860

Dear Sirs

52-53 Russell Square, London, WC1B Planning and Listed Building Consent application

We write on behalf of our client, École Jeannine Manuel UK, to submit planning and listed building consent applications in respect of 52-53 Russell Square. The proposals are for minor external and internal alterations in association with the use of the building for Class D1 educational uses (application reference 2017/2285/P).

Planning permission and listed building consent is sought for:

"External alterations including installation of louvre grilles, flues and vents to the roof, and the provision of cycle stands along Bedford Place; and internal alterations, including the installation of fire lobbies, ventilation units, internal partitions, acoustic wall linings, teaching walls, and associated works."

The Site

52-53 Russell Square is a Grade II listed 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.

Background

On 26 October 2017, London Borough of Camden Development Control Committee resolved to grant planning permission for the change of use of 52-53 Russell Square from office (Class B1) use to a non-residential institution (Class D1) use (Ref: 2017/2285/P).

In order to facilitate the change of use, internal alterations are proposed at the site, alongside minor external alterations, including the provision of cycle stands along Bedford Place and louvre grilles to at lower ground floor level. These proposed works are set out in further detail in the proposals section below.





Pre-Application Enquiry

A pre-application enquiry in relation to the proposals was submitted in December 2017. A formal response to the proposals was received on 29 March 2018 (ref.2017/7101/PRE).

Generally officers considered that the proposals were acceptable in principle. The pre-application advice summarised that the noise mitigation proposals and internal alterations appear acceptable in heritage terms. The pre-application advice requested the reconfiguration of the cycle storage, to comply with the Council's standards in terms of layout and spacing.

The pre-application advice has therefore been taken on board and incorporated into the proposals and the cycle storage proposed under this application has been reconsidered to comply with the Council's standards.

Proposals

Some minor alterations are proposed to the property as part of Ecole Jeannine Manuel's occupation.

The proposals include the following works:

- Internal alterations including removal of existing partitions and installation of new partitions;
- Introduction of smoke lobbies;
- Installation of 28 cycle parking spaces of which 8 are to be located internally and 20 to be located externally enclosed by railings on Bedford Place;
- Installation of acoustic wall linings and additional measures to reduce noise transmission between the school and adjacent residential properties; and
- Minor external alterations including louvre grilles and flues and vents to the roof.

The only external works relate to the introduction of louvre grills at the lower ground floor level of the property and the installation of cycle racks to accommodate 20 bicycles within the railings on Bedford Place.

The proposals are further set out in the accompanying Design and Access Statement and Scope of Works.

Planning Policy

The Statutory Development Plan consists of the Consolidated London Plan 2016 and Camden's Local Plan (2017).

Considerations

Conservation

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 the 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 the 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.

Policy 7.8 of the London Plan seeks to conserve heritage assets such as listed buildings and Conservation Areas.

Policy D2 of the Camden Local Plan (2017) states that the Council will resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building. Policy D2 also requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

The change of use of the premises to educational Class D1 use has received a resolution to grant planning permission at Development Control Committee (Ref. 2017/2285/P). Additional works are proposed in order to support the use of the building as a school. As a result of the change of use to Class D1, smoke lobbies are proposed on every floor; see accompanying Design and Access Statement for more details. The lobbies are proposed for the purposes of fire safety and have been designed to be as visually unobtrusive as possible to ensure that the full extent of the principle rooms of both 52 and 53 Russell Square can be appreciated, and are also fully reversible. As such, it is considered that the smoke lobbies will have no harm on the listed building.

At basement level, the replacement of existing modern fittings and new plant services will have no impact upon the listed building. The removal of existing partitions and installation of new partitions at ground to fourth floor will not impact upon historic fabric.

Acoustic wall linings will be installed along the separating wall in rooms proposed to be used as classrooms. The proposed acoustic linings will require new skirting's in a matching pattern to the existing to be fitted, however the skirting's and cornices at no.53 Russell Square are not original features and therefore the proposals will not lead to a loss of historic fabric. At fourth floor level the independent lining is proposed in the loft space and additional acoustic sealing is proposed to the modern connecting door. The linings will also be fully reversible.

A Heritage Statement prepared by KM Heritage accompanies this application. This sets out that the proposed works will not have a lasting impact upon the historic fabric of the building. The Statement concludes that there will be no harm to the listed building as a result of these proposed works.

The proposed external alterations are minimal. The proposed louvres, flues and vents will not be visible in views within the Conservation Area and although the proposed bicycle racks will be visible, they will have no impact upon the historic significance of the building or wider Conservation Area.



Design

Policy 5.3 of the London Plan requires development to incorporate exemplary standards of sustainable urban design. Policy D1 of the Camden Local Plan seeks to secure high quality design in development, which respects the local context and character, and preserves or enhances the historic environment and heritage assets. The Policy goes on to require the use of high quality materials which complement the local character and contribute positively to the street frontage.

It should be noted that the proposals allow for only minor external alterations which consist solely of the proposed louvre grilles, flues and vents to the roof, and the proposed cycle racks. The proposed louvres are at lower ground floor level and the flues and vents to the roof will not be visible in views within the Conservation Area. As such the proposed louvre grilles, flues and vents are considered to be in keeping with the listed building and the surrounding Conservation Area.

The proposed bicycle racks are small in nature and although visible through the railings from Bedford Place, are considered to be of an appropriate design to support sustainable transport methods and do not detract from the listed building or the wider Conservation Area.

Summary

The proposed works will include both internal and external alterations which are not considered to harm the historic significance or character and appearance of the listed building or the Conservation Area.

Application Documentation

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

- A copy of this cover letter;
- A site location plan at 1:1250 scale;
- Existing, demolition and proposed plans;
- · Design and Access Statement;
- Scope of works:
- Historic Appraisal; and
- CIL form.

The requisite fee of £234.00 for the planning application has been paid over the phone, under payment reference PP-06927477.

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

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