

From: Bob Osborne

Sent: 20 June 2018 13:15

To: Young, Tony; Tulloch, Rob; Adam Harrison; Madlani, Rishi (Councillor); Beales, Danny (Councillor); McDonald, Neil; David marchant Home

Subject: Objection to planning application 2018/2224/P

Dear Tony Young

Please find below a detailed objection to planning application 2018/2224/P.

This objection is sent on behalf of all residents 54 Russell Square which is the adjacent building to 52-53 Russell Square.

Response to planning application 2018/2224/P

Changes to the internal fabric of 52/53 Russell Square to make it suitable for use as a major secondary school adjacent to a residential property in full time occupation by five families.

This response is sent on behalf of all five families occupying the adjacent property at 54 Russell Square.

There is a long history attached to this application and it is being made at the same time as a change of use application is pending.

We have submitted evidence that the original application for a change of use should not be confirmed and await an adequate response to that submission.

We object to this application and think it should be sent back to the applicant for resubmission on the grounds given below. Further it should only be resubmitted and considered if and when the full conditions of change of use are available since these are likely to have considerable implications for this application

1. Change of use has not yet been finally granted - and, if it is, there will be substantial impact on this application. Further the applicant has no lease for the building and should not therefore be allowed to make an application of this sort.

The change of use application which went before committee over 7 months ago has not yet been granted. It is subject to challenge as to whether Change of Use is actually needed. If it is granted, there will be very significant S106 conditions attached to it as well as management plans which are subject to review by Councillors. No drafts of the S106 text nor the associated management plans have been made available and they could have significant impact on these proposals. No work can be started without that final approval and agreement and therefore this application should only be considered if and when all information is available and when the applicant has a lease for the building from the Landlord, Bedford Estates.

2. There are many internal inconsistencies in the application.

There are many inconsistencies in the application and in some cases important details are not specified. As an example of the inconsistency, not all rooms are itemised, for example room G13 is not included in the schedule of works. Inconsistencies of this sort will give the applicant the leeway to vary the treatment of walls on soundproofing etc and avoid being held to account if work is not done. There are many other examples of contradictory or incomplete statements and works as important as these should be clearly specified and detailed. This application fails to do that and should be returned to the applicant.

3. The details of acoustic treatments on the party wall need to be more explicit and consistent

This is an area of great concern to us. We fully support the fact that the application seeks to install acoustic panels, infill gaps that will reduce noise transmission, fully carpet rooms etc. We are certain that this can all be done without damaging the historic fabric of the building since this can all be done with removable panels etc.

It is proposed that additional independent acoustic wall linings will be inserted along the separating wall in rooms proposed to be used for classrooms to upgrade the acoustic performance of the wall. None of the skirting or cornices in No. 53 are original – all having been replaced during previous refurbishment works. Therefore this

element of the proposal will not lead to any loss of historic fabric. The linings have also been designed to be fully removable so that should the School move out then the linings could be removed and the original fabric revealed.

The Heritage Appraisal, the Schedule of Work and the Design and Access Statements in the planning documents all have different descriptions for the Acoustic treatment of the party wall with 54. The Schedule of work however accords with the email from Gerald Eve, namely - "Provide independent acoustic dry-lining full-length to separating wall to No.54 with new replica cornice and skirting; Redecorate in Scrubbable matt emulsion. The full height full length as cornices and skirting being new allows the complete treatment of all the party wall which reduces the potential for a flanking transmission path described in Clarke Saunders report on the sound test to the third floor".

The school has proposed that the improvement in acoustic performance will be made by infilling the fire places with acoustic dry lining and taking up the floorboards and filling any holes present where the floor joists are built into the walls (and filling any other obvious cracks/holes/joints) which allow transmission of noise. These works to be carried out when the other internal works are completed in advance of occupation of the building by the school.

The specification for the wall lining appears to be IP O4 K10/146 and IP04a K10/146 for clarity this applies over the whole of the party wall between 54 and 53 from basement to 4th floor not just the fireplace .

In addition to the above, the school say in their planning submission that rooms that abut [54 Russell Square](#) will be used only for activities that attract fewer occupants. As above, this means that the school will not use these rooms for assemblies, will have no classes beyond 4.30, that cleaners will be finished by 6.00 at the latest and that the school will only be open beyond 6pm for a few days a month for parent consultations and that these should be held in rooms that do not have a party wall with residents. The school will not operate during school holidays and will not sublet the building for summer school or other use.

The schedule of Work confirms that all classroom floor surfaces will be carpeted so that the scraping of chairs will not be an issue, and that there will be no bells/klaxons sounded to indicate the change of lessons. The noise generated in the classrooms will to be limited to a maximum of 75 dB averaged over a 10-minute period.

The Schedule of works makes no reference to the removal of the existing secondary acoustic windows these should be retained or installed to all classrooms to prevent both noise break-in and break-out.

At fourth floor level the independent lining is proposed in the loft space and additional acoustic sealing is proposed to the modern connecting fire escape door to 54. This door has been examined by Bedford Estates who confirmed it to have an inadequate fire resistance as required for a party wall location, and both the door and frame should be replaced. This route is provided for emergency escape of the staff occupants of the fourth floor in the event of a fire and can not be secured. To limit access on this basis a security system should be fitted to door D4 N01 to ensure that the students in the lower floors do not have access to [54 Russell Square](#). We consider our security to be of paramount importance.

4. The design and access statement is inadequate

The design and access statement makes no reference to movement of 200 students and staff every 45 minutes due to time-tabling of the various rooms. In the Change of use application the plans were very vague and now with the detailed plans they have still not put forward a method statement for the operation of the building in detail, changing rooms between lessons, lunch time activities etc.

The school have made great play about smoke lobbies but how do the students change class room? The only space is for either doubling up the class size which will result in significant noise generation or have the children standing on the stairs which sounds very dangerous and noisy. When we met with the head teacher he thought there was two stairs but the second is a narrow spiral stair and totally unsuitable. With a single stair there is no way to have an up and a down stair, the stair is open and with all the jostling it is frankly dangerous. The building is not fit for purpose.

The main access to the building is proposed via the door to 53 this is naturally adjacent to 54 and with 200 people arriving within 30 minutes the noise and disturbance will be excessive and significantly greater than is the existing situation. The main entrance to the school should therefore be through 52 rather than 53 and the room adjacent to 54 on the ground floor should have full acoustic panelling.

The school propose that during the day the students will leave and arrive via the door in Bedford Place. This should be a requirement of the grant of this application and should be confirmed by the applicant.

We propose that the applicant should be required to submit a revised design and access statement that fully addresses the use of the building as a secondary school with all the student movements that will result. If it

cannot be demonstrated that the building can safely accommodate this level of movement, then use as a secondary school should be refused.

5. The use of the third floor for Laboratories needs closer examination and specification.

These plans make it clear that the third floor will be used for school laboratories and that these laboratories will be adjacent to residential accommodation. Whilst there are plans to install acoustic panelling to limit the noise (which we support), we are deeply concerned about the fire and hazard risk that this use could present. We think that a detailed analysis of this risk needs to be undertaken and evidence given that this use presents no risk at all to the residents of the adjacent building. We also think that there needs to be clear evidence that these areas can be safely evacuated by students given that there is only one central staircase that can be used for this evacuation. If this evidence is not given, then the use of these rooms for this purpose should not be permitted.

6. Summary

This application should be refused at this stage on the grounds that the applicant does not yet have approval for use of this building as a major secondary school, nor do they have a lease. The application itself is inadequate and needs further clarification and also needs to reflect and meet the requirements of S106 conditions and associated management plans which are not available at this time.

Sent on behalf of all residents of 54 Russell Square

Bob Osborne
David Marchant

20th June 2018