

Following comments from the Camden Planning Policy Team, Savills has prepared this note to respond to the points raised. The key points are set out below, along with the justification case for the intended change of use.

### a) Protecting Existing Community Use Floor Space

As pointed out in your response, Policy C2 aims to protect *community use* floor space. Whilst it is accepted, of course, that community uses are vitally important to Camden, in this circumstance it is not economically viable for our client to stay in the Borough long-term at no.10 GTS, due primarily to increased high costs of occupation at this particular central location and given a demonstrable overlap (in service provision) with other providers in the Borough (note: of all London Boroughs, Mary Ward understands that Camden has the highest level of provision of adult learning and legal support provision per head of population) – including with the **Blackfriars Settlement**, a registered charity based in Southwark for over 130 years, with whom Mary Ward merged on 1 May 2018.

The combined charities together aim to create and provide community services and support tailored to London's needs, which in 2019, are felt most acutely in East London (particularly in Newham, one of the fastest growing but most deprived areas of the capital). The charities have come together to tailor and redirect their long-held aims and aspirations of care and compassion, through adult learning and development, providing legal support where necessary, to the communities that need such support the most.

#### All of the charities' work is guided by five aims:

- Supporting the achievement of individual aspirations;
- Promoting physical and mental well-being and independence for all;
- Promoting learning and development - formal and informal;
- Promoting digital inclusion; and
- Being a focal point in the community.

The merged charities will continue to provide services for Camden, whilst redirecting efforts and resources to other parts of London, as encouraged and directed by the GLA and the Mayor himself.

Mary Ward's history began in the 19<sup>th</sup> century Settlement movement and was based on the strong belief that everyone was entitled to, and could benefit from, life-long learning. This passion remains at the core of what Mary Ward does, and has been doing for well over a hundred years, across the whole of London. There is every expectation that large numbers of Camden residents will continue to access our services whilst, with the move to Stratford, there will be a chance for a whole new cohort of adults to experience what will be, for many, life enhancing and changing opportunities.

Large numbers of people, including those who come to Mary Ward for free legal advice, from across London, and beyond, rely on the organisation. It is incumbent on the charity to follow a plan that will provide long term sustainability and the ability to continue to meet those wide ranging needs, not just in the present, but for the next one hundred plus years and beyond.

The property strategy that Mary Ward is following is the only path that achieves this essential goal of long term sustainability. A new lease of 42 Queens Square in July 2022 would have led to a minimum increase of £500,000 in rent per annum, leaving the charity no longer a going concern. The property

at 10 Great Turnstile was sold in order to fund the strategy of purchasing a building in Stratford, with the decision to lease back until 2022 taken for both financial and operational reasons. This has meant minimising the disruption of our service provision between 2018 and 2022 whilst giving us more time to effectively plan the move. The merger with the Blackfriars Settlement was also key to achieving financial sustainability, offering a further location from which to provide all of our services.

Further to the above, a robust marketing strategy for letting of the third floor at 10 Great Turnstile Street has been undertaken for the last 14 months, and there has been no 'concrete interest' from any user consistent with a D1 educational use. This is not surprising, in the current climate, nor given the widespread service provision across Camden from a great range of existing educational, charitable and governmental organisations located in the Borough. There is a generous service provision of such activities / land-use already within the immediate location, particularly focussed in the Holborn Area.

Given the charity has undertaken proper and genuine marketing of the D1 unit subject of this planning application, with no tangible success and without securing a tenant, it is of course likely that Mary Ward will lose much-needed revenue if this part of the building cannot be let.

It is clear that the proposed change of use, which retains the option for a D1 educational use, is the most pragmatic, commercially-astute and appropriate course of action for Mary Ward to take, in the challenging circumstances now faced.

The willingness to agree to the change of use will substantially increase the likelihood of finding a suitable tenant and their rent will make a substantial contribution to an organisation already expecting to make small losses in 2018/19 and in the year to come. In a climate of huge uncertainty a positive response to this application will help to reduce the pressure to make any cutbacks to our highly valuable services.

### **b) Charity's Future in the Borough**

Mary Ward have been located in Holborn for over 100 years, providing specialist adult education for Camden residents.

As mentioned above, Mary Ward is unable to remain at 10 Great Turnstile Street. However, this should not be seen as a loss in community services provision to the Borough.

Whilst it is noted that they will not be located at these two properties within the borough, given the easily accessible transport connectivity to the new premises in Stratford, it would be wrong to state that people living in Camden will not be able to travel and benefit from this centre. Many of the current, day time, users of services travel between 30 and 60 minutes in order to get to Mary Ward. Consequently it is perfectly reasonable to believe that Camden residents will be willing to take advantage of the new centre, with a journey time of just 32 minutes between Holborn and Stratford stations being a good example of why this is likely.

Mary Ward will also continue to provide adult education at 10 Great Turnstile in the form of the dance studio on the lower ground floor. This continues to offer a programme of dance classes, sessions of yoga and pilates, as well as other fitness programmes, particularly for the elderly and those less mobile. This use is unique to that building, in that location.

### c) Replacement Facilities

As outlined in the case officer's communication for this planning application, Camden has stated that if the charity is to comply with Policy C2, Mary Ward should provide a replacement facility to the existing one, meeting the needs of the intended users. As mentioned above, the charity has undergone extensive marketing for the third floor of the property and has found no interest for a community use, for the space, albeit interest has been shown instead, for medical-related D1 use and B1 uses. However, in respect of the B1 uses, interested parties have been unable to commit without the guarantee of planning.

Additionally, as already briefly mentioned, Camden and the local Holborn/Mid-town area in particular has a generous existing supply/provision of specialist adult education services, most notably found at the *City Lit* and *Working Men's College* facilities, located nearby at 1-10 Keely Street and 44 Crowndale Rd. This is especially significant in respect of the *City Lit* centre at 1-10 Keely Street, a specialist adult education provider some four times the size of Mary Ward.

In conclusion, our application seeks to expand the permitted range of Class D1 uses permissible on the third-floor of Mary Ward's building at no.10., limited to some 200 sq.m of floorspace only. This is not a large amount of space; but it is of considerable importance to the charity, in terms of income and resources.

Considering that sufficient marketing of the premises has been undertaken; the agent's efforts to let the accommodation to an education provider has been unsuccessful to date (note: efforts continue, of course); and bearing in mind a generous level of adult educational service provision across the local area, it is clear that the potential loss of the third-floor of the building in question from further community use educational use provision is arguably negligible and of limited significance. Moreover, there is a compelling need to enable Mary Ward to make best use of its facilities (now for a limited period only, given the sale of the building and the charity's intended relocation from no.10), both from financial and charity management perspectives.