

T: 07900 413080
DDI: 0207 692 0643
E: stuart@smplanning.com
W: www.smplanning.com

The logo for SMPlanning, featuring the text "SMPlanning" in a white, sans-serif font on a dark rectangular background.

80-83 Long Lane,
London,
EC1A 9ET

Via email only

18 October 2019

Dear Rachel

Planning Application 2019/3961/P

Boston House, 36-38 Fitzroy Square London W1T 6EY

Change of use from office (Class B1a) to a flexible use for use as either offices (B1a) and/or a non-residential education institution (Class D1) including internal alterations.

I write to you in regard to the above planning application submission. Having reviewed the neighbour objections submitted to the Council, I thought it would be useful to address some of those concerns raised. It is clear that the main areas of concern raised by neighbours relate to the number of students attending the university and the future operation and management of the site. Accordingly, please find additional commentary on these matters which should provide greater clarity on the proposal and address the concerns raised.

Proposed land use and increased usage of Fitzroy Square

Whilst the number of people using Fitzroy Square would increase as a result of the change of use, this would not be focused around the rush hours of 8-9am and 5-6pm. Students would be coming and going in small groups throughout the day in order to attend their lectures, whereas the previous use of the building meant that a large number of people arrived for work between 8am and 9am, and left work between 5pm and 6pm.

With the current enrolment at New College of the Humanities (NCH) in 2018/9 of approximately 200 students and 50 staff, the university recorded over a week in January a maximum of 70 access cards being used on a day-to-day basis. This demonstrates that there is only a small percentage of the total number of staff and students on site at any one time.

The current number of students enrolled at the College stands at 210 (204 undergraduate and 6 postgraduate). Following the merger with Northeastern University, it is expected this number will increase to around 500 in the short term as the College becomes more well known.

Hours of operation

Although the College will be open from 8am until 10pm Monday to Friday and 10am to 5pm on weekends, classes will predominantly run from 9am to 6pm on weekdays. NCH understand the neighbour concerns about late opening times, but it is only expected that a small number of people will use the College outside of normal class times for additional tuition, study sessions and extracurricular activities. In the College's current location, the building is usually empty by 8pm. The College will be open at the weekends as a study space for students, but historically weekend attendance has been extremely low (10-20 students) and this number is not expected to increase by much.

The college guest lectures are an important part of the academic term when students can meet and interact with experts in their field. NCH currently hold approximately 20 lectures a year and it is very unlikely that the number of guest lectures would increase following the change of use and refurbishment. In the interests of public benefit, the College will also be opening up some of the guest lectures to local residents when spaces are available.

Having regard to the social evenings, the college have never had any complaints about noise levels or antisocial behaviour during the social evenings held at their current home on Bedford Square, a similar residential square situated 10 minutes away from Fitzroy Square. The College are committed to continuing to manage these events responsibly and ensuring that they are a conscientious and respectful neighbour.

In order to alleviate neighbour concerns to the operating hours, and should the Council consider it necessary, the College would be willing to accept a suitably worded condition which controls the hours/days of operation.

Servicing the College

The College currently receive between five and ten deliveries a day and the number of servicing trips associated with the proposals is not anticipated to change. Delivery and servicing are proposed to be undertaken from Fitzroy Square, which is consistent with the existing delivery and servicing arrangements at the site for the existing office use. Based on the nature of the proposed development, it is anticipated that delivery and servicing would be undertaken using refuse vehicles and small vans meaning that the proposal would result in no increase or changes to the existing delivery and servicing arrangements.

Boston House currently operates as a car-free development and the proposals do not seek to change this. Due to the proximity of nearby bus stops (Warren Street, Stop X; Great Portland Street, Stop H), London Underground Stations (Warren Street, Great Portland Street, and Regent's Park), and a National Rail Station (London Euston), the PTAL (Public transport accessibility level) for the site is the highest obtainable score of 6b which is considered to be 'excellent'. Therefore, it is expected that virtually no students will be using private cars or taxis. As part of the planning application the submitted Travel Plan (TP) identifies the College's long-term strategy to maximise the use of sustainable modes of transport where possible.

The TP further highlights that a Travel Plan Coordinator (TPC) is to be appointed by the NCH and shall be responsible for the coordination of the TP and its successful implementation.

Impact on neighbouring amenity

It is acknowledged that some neighbouring residents may have concerns about how the change of use might increase the level of noise on site, but the College do not expect this to be the case. Whilst the overall staff and student numbers are greater than that of the previous B1 use, it is expected that students will only be on site for teaching for 13 hours per week. The potential for noise and disturbance to neighbours will therefore be no more significant, if not less, than the current operations of the B1 use whereby approximately 200 plus office workers arrive and depart at a similar time.

In addition, very few social evenings will be held on site and these will be held in the basement of the building.

Concerns have been raised by some neighbours to the potential of antisocial behaviour from students resulting in increased noise, inappropriate behaviour and littering on Fitzroy Square. As outlined within the submitted NCH Proposed Operational Plan, the College are committed to ensuring the operations of the building and the working practices of staff and students are sensitive and respectful to the amenity of neighbouring occupiers. This includes students adhering to the college's Code of Conduct and Disciplinary Policy that sets the expected standard of behaviour from students. In this regard it is not expected that neighbours would be subject to antisocial behaviour and the College would be willing to enter into a s106 legal agreement to commit to the obligations within the operational plan.

Use of the gardens

As a frontage to the garden, Boston House (and its occupiers) can access the gardens and become members of the management committee. The College would be delighted to become an active member in the garden community and support the needs of the Committee in any way possible. The College would hope to use the garden occasionally for events like graduation, subject to terms and conditions identified by the Committee and would be very happy to agree limited numbers in advance of any events with the committee.

Public benefits

In accordance with the Employment and Business Use CPG, NCH are committed to providing training and employment support. In addition, and whilst not required by policy, a package of benefits supporting economic growth within the borough, are also to be offered by the college and which can be secured by a s106 legal agreement. These include; training and employment support; business training courses/classes for start-up businesses; provision of online training courses/programs and car free development. Furthermore, as highlighted within the supporting planning statement the College would welcome the opportunity to liaise further with the Council should further contributions be considered necessary to support the proposal. In this regard, the proposed development is considered to deliver a

suitable package of economic/community benefits proportionate to the proposed development.

Conclusion

I trust the above is helpful to you in considering the neighbour responses received and provides greater clarity on the questions and concerns which have been raised. I would be happy to discuss the proposals with you in more detail and answer any further questions you may have. Please do not hesitate to contact me.

Yours sincerely

Stuart Minty
Director
SM Planning