Application No:	Consultees Name:	Received:	Comment:	Response:
2020/2606/L	Dr Ronald Agble	09/07/2020 21:53:06	OBJ	Dear Ms English

Objection to planning application nos: 2020/2226/P, 2020/2606/L (Boston House) and 2020/2319/P (County House)

We, the inhabitants of a flat on Fitzroy Square, write to you to set out our very strong objections to the above planning applications.

Our three main objections, based upon planning legislation and the London Borough of Camden's (LBC) own planning policies and guidance, are as follows:

There would be severe detriment to the character of the Fitzroy Square Conservation Area and listed buildings;
There would be considerable loss of employment space in LBC; and
Northeastern / NCH (referred to as 'NE' below) have ignored residents' and business' concerns, set out in the objections to their previous (withdrawn) planning application in autumn 2019.

We expand on each of these points below.

1. Severe detriment to the character of the Fitzroy Square Conservation Area and listed buildings.

The New College of Humanities (NCH) has been acquired by Northeastern (NE), which is a large (26,000 students), private university based in north America: i.e. it is not a Camden-grown business providing educational facilities for the local community - but, instead, is to become a major campus for academic tourism for US-based students.

The current proposal is for up to 1,200 students, plus staff, to occupy Boston House. This will fundamentally change the character of the Fitzroy Square Conservation Area and the setting of the Robert Adam listed buildings.

This number of students is not appropriate for the part residential, part commercial area and its quiet, pedestrian, community-friendly streets. The noise, smoking, litter and boisterous behaviour of many students - which is evident outside other university campus' on Marylebone Road (A501) and Regents Street (A4201), will destroy this neighbourhood irreversibly.

The applicant is moving from Bedford Square, that is formed on one side by the A400 (Gower Street) a busy London thoroughfare that is much more appropriate for this type of intensive use that will operate from 7 days a week from 8am and up to 11pm.

It is of no consolation and of no relevance that the applicants report that they have not had any complaints from their current neighbours on Bedford Square: the amenity, uses and background levels of activity on Bedford Square are simply not comparable with those on Fitzroy Square - and furthermore, so is the increase in student numbers from 200 (at the current premises) to 1,200 (expected for Boston House).

2. Considerable loss of employment space in LB Camden.

Application No: **Consultees Name:** **Received:** **Comment:** **Response:**

NE submitted an application in 2019 that was withdrawn on the basis of the loss of office / employment space, which is contrary to LB Camden's policy. Whilst, arguably, less office space is being lost in this current application, there is at least a decrease of c.5,600 sq. ft.. This is not an insignificant amount of space, and could be well used to house numerous Small and Medium sized Enterprises (SMEs).

The applicants say that part of Boston House would be used for office use - i.e. the loss of employment space is not so significant. However, this is incorrect, because the offices would still technically be education use and could be converted back to educational use at any time without the need for planning permission.

Furthermore, and importantly, the reduction in the loss of office space is entirely disingenuous in our view, because this is only achievable by including Bedford Square (where NCH is currently located) and County House in the application. To do this requires the closure of a local accountancy school business (currently situated in County House) that has operated in the borough for many years and that has sat harmoniously alongside the residents and commercial uses on Fitzroy Square and the surrounding area.

It should also be noted that County House is not of comparable quality to Boston House. It is accessed via a back alleyway off Conway Street, doesn't front or even overlook Fitzroy Square and, therefore, really should not be considered as an appropriate swap for the offices in the beautiful Grade 1 Listed Boston House.

Finally, as Landmark Chambers have opined upon, the s106 mechanism that is proposed by the applicant is defective as NE (or NCH) do not have a freehold interest in the Bedford Square property that they are vacating. This means the application is contrary to policy, because of the loss of office, as the previously withdrawn application.

As set out by independent professional opinion from a reputed firm (who have let thousands of square feet of office space in the area), there is strong demand for good quality office space in the area.

In our view, Boston House, which had been occupied by businesses for several years without issue, has not let because the owner failed to refurbish and modernise the environment. Indeed, we understand, the building has not been properly refurbished for at least ten years.

Such refurbishment should have been factored in to the plans when the building was recently purchased by its current owner.

As far as we are aware, the planning regulations and policies regarding change of use are not in place to 'bail out' property owners who fail to make the most basic investments to ensure the uses for which their properties are authorised can be faithfully met. As such, we feel it would be dangerous and unhelpful precedent for LB Camden to facilitate that to happen in these circumstances.

So, we urge Camden to ensure they make every effort to apply their employment protection policy as rigorously in Fitzroy Square as they do elsewhere across the borough.

3. Northeastern have not listened to resident and businesses concerns

Application No:	Consultees Name:	Received:	Comment:	Response:

We objected to NE's 2019 application and I am disappointed to see that the new applications are in no way responding to concerns raised by residents; on the contrary, the revised NE proposal is even more extensive.

The new two-application approach and three-way s106 agreement, represent an entirely underhand attempt by NE to try and circumnavigate Camden's planning policy to protect employment space.

Surely, there are other existing university campus buildings where NE could relocate to, particularly as many universities, in the current pandemic crisis, are struggling and trying to reduce their premises and liabilities.

The Local Planning Authority should enforce their policies and national policy and statute (National Planning Policy Framework and The Planning (Listed Buildings and Conservation Areas) Act 1990) to prevent this campus from establishing and growing on Fitzroy Square and to preserve the Square.

It should be evident that, once this large US-based educational business establishes the first component of a base on this residential / office use square in a conservation area, there will be no turning back; and the precedent it sets will invite further incursions (by NE or other similar entities) to this important Georgian Square. We believe these will fundamentally change the quality of life of existing and future generations.

This planning application was questionable in autumn 2019. Given how the world of ‘educational tourism’ has changed so radically since then, this now looks a highly anomalous application.

It is also very clear that an adequately refurbished Boston House will be able to provide high quality and highly attractive office space in this desirable location in the heart of Fitzrovia: if our planning policies and legislation do not help encourage that to happen, then I wonder what they (the legislation and policies) and their custodians (LB Camden) are for.

Yours sincerely

Dr Ronald Agble