



Robert Irving Burns

Property Consultants

7th August 2020

Dear Rachel

Planning Application: 2020/2226/P

Re: Change of use of Boston House, 36-38 Fitzroy Square, London, W1T 6EY from office (Class B1a) to a non-residential education institution (Class D1) including internal alterations.

I am writing to address your comments regarding the above planning application and included in your email sent to Stuart Minty of SM Planning dated 23/07/2020. This letter forms a response to your comments pertaining to the proposed loss of office space at the site, as copied below;

Whilst the loss of overall office floorspace is now less due to the land use swap, it is still a significant amount, and we maintain concern at the marketing evidence provided. As mentioned at pre-app stage, there has clearly been a lot of interest in the site, including from potential office occupiers. Whilst the applicant has now provided more detail as to the outcomes of these enquiries, there still seem to be several from office occupiers where it is unclear why the space was unsuitable. Whilst the building has been marketed for the required 2 years, to justify a change of use, we would expect to see strong evidence of a space's unsuitability for its current use.

The purpose of this letter is to provide detail and clarity on the reasons why several office occupiers did not pursue further interest in the premises at Boston House. This should of course be read in conjunction with my previous letter dated 19/05/2020 and the submission documents which formed part of the planning application submission.

In response to your above comments, please find attached an updated viewings schedule detailing the viewings of the premises that have occurred to date. This, as requested, provides expanded comments on the reasons as to why interest was not pursued from those interested parties. As you will acknowledge, the property has now been marketed in excess of 2 years, with several of the viewings of the property occurring over 3 years ago. The reasons why interest from viewers was not pursued past the initial viewing(s) is of course constrained by the level of feedback given at the time by the viewers, however our best efforts have collated these reasons in the attached schedule. You will note that whilst brief, the table does provide an accurate reflection of the feedback received and indicates many reasons why the property was considered unsuitable.

As evidenced in the table, over the last three years, there has been significant interest in an initial viewing of the property (196 in total). These have primarily been by companies seeking an office use. The substantial number of viewings is evidence that the property has been well marketed over the last three years with substantial interest generated and viewings arranged. However, of these 196 viewings, none have progressed beyond the initial view. This is significant evidence that the property is not considered suitable for office use by the market.

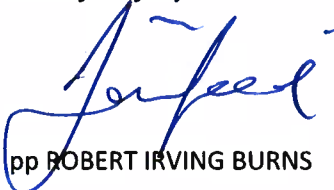
Furthermore, the marketing of the property did attract the interest of large-scale and reputable office operators, including The Office Group & Labtech, who specialise in repurposing large office spaces into smaller, more saleable units. However even these companies who seek to subdivide larger premises into smaller office spaces have showed no further interest in this particular property. There are 5 instances (highlighted red in the table) where there was further interest in the property, however this was subject to planning permission being granted for a D1 use. This table, along with the submission of previous documents and the time the property has been marketed, and remained vacant, is clear and sufficient evidence that it is no longer suitable for is lawful office use.

Paragraph 81(d) of the National Planning Policy Framework (NPPF) states that planning policies '*should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances*'. The continued vacancy of this building, in such a prominent location for business uses, is evidence that the current use is no longer suitable and therefore, in this case, flexibility should be shown where there is demonstratable need for alternative uses. In this instance the need for D1 use is clear and present. Further to this, market conditions have been severely affected by COVID and will result in substantial changes to workplaces and workplace practices, having enormous impacts on office spaces across the capital. Now more than ever, the need for further education facilities, particularly for a younger generation of people who might otherwise find it difficult to seek employment, will be crucial for the economic recovery of the capital.

The submitted information, the attached table and the extensive and pro-longed marketing of this property clearly demonstrates that there is no interest in the continued use of the property as office space. It is unsuitable, and despite much initial interest, the lack of subsequent interest proves that it is no longer appropriate for its designated use.

I trust that the above and the attached table are helpful and more definitive in demonstrating why potential occupiers have considered the space to be unsuitable and why the proposed change of use should be granted.

Yours faithfully



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Enclosed: Updated Marketing Viewings Schedule

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