

For and on behalf of
Hult International Business School Limited

PLANNING AND DESIGN AND ACCESS STATEMENT

Hult International Business School, 37-38 John Street, Holborn, London, WC1N 2AT

**Prepared by
DLP Planning Ltd
London**

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1.0 INTRODUCTION

Background

1.1 This Planning and Design and Access Statement has been prepared by DLP Planning Limited on behalf of Hult International Business School Limited to support a full planning application for the retention of a flexible office and education/non-residential institution use at 37-38 John Street, within the London Borough of Camden. Planning permission was granted in 2011 for a flexible B1/D1 use for a period of 10 years. Hult now wish to extend this flexible use, with reference to the 2020 Use Classes Order.

1.2 Planning permission is therefore sought for the:

“Retention of the site for flexible use as either office use (Use Class B1) (Use Class E from 1 September 2020) and/or educational/non-residential institution use (Use Class D1) (Use Class F1 from 1 September 2020) from the lower ground floor level to the fourth-floor level.”

Hult International Business School

1.3 Hult International Business School (Hult) is a registered charity and a non-profit American Business School which offers both graduate and post graduate part time courses. Hult has two campuses in London (John Street and Aldgate East) and additional campuses in Boston, Dubai, and San Francisco, and global rotation centres in Shanghai and New York City. Students and faculty rotate through multiple campuses, and the international perspective on business education underpins the vibrant academic environment of the School. The School seeks to deliver programs that are of direct relevance to the world’s leading employers. As such, Hult is focused on making a positive impact on business leaders in a global environment, helping managers integrate commercial success and societal wellbeing. Hult strives to be the most relevant business school in the world. By using their global reach and remaining creative and entrepreneurial, their aim is to have a positive impact on individuals and organisations by transforming their management practices. They are committed to sustainable growth, helping leaders to integrate commercial success and societal well-being.

1.4 The Hult International Business School at 37-38 John Street is the postgraduate campus, where students take courses as part of the Masters in International Business, International

Marketing, Masters in Business Administration and the Executive Masters in Business Administration which is their part-time program. All these masters have a duration of one year, with the exception of the executive program which can be spread over two years. The classes are typically held on site, although in the current environment Hult has developed a Limitless Learning modality which enables students to combine in-person and online learning and transition between the two.

The Planning Application

- 1.5 The application relates to 37-38 John Street (“Hult House”), which comprises a five storey plus basement building located at the corner of Theobalds Road and John Street. The building has been occupied since 2011 for D1 purposes.
- 1.6 The operative planning permission for the site is that granted on 16 September 2011 under planning permission ref. 2011/2832/P for *“Change of use from office use (Class B1) to flexible use as either office use (Class B1) and/or educational/non-residential institution use (Class D1) from lower ground floor level to fourth-floor level”*
- 1.7 An informative endorsed on the 2011 permission states that: *“you are advised that if implemented, the alternative use permission hereby granted gives flexibility of use from 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the uses is taking place at the time”*.
- 1.8 Hult International is required under the terms of its lease to apply (by 16 September 2020) for a renewal of the flexible dual D1/B1 use for a further ten-year period to ensure the retention of both B1 and D1 uses.
- 1.9 This planning application is supported by a Site Location Plan; existing floor plans and a Travel Plan. A summary of the Business and Community Support Plan, Service Management Plan and Sustainability Plan are provided at Sections 4, 5 and 6 of this Statement, along with an update since the previous permission in 2011.

Structure of this Planning Statement

1.10 This Planning Statement will cover the following matters:

- Section 2.0: The Site and Surrounding Context
- Section 3.0: The Proposal
- Section 4.0: The Business Support Plan
- Section 5.0: The Service Management Plan
- Section 6.0: The Sustainability Plan
- Section 7.0: The Travel Plan
- Section 8.0: Planning Policy Context
- Section 9.0: Planning Assessment
- Section 10.0: Summary and Conclusion

2.0 THE SITE AND SURROUNDING CONTEXT

The Application Site

- 2.1 Number 37-38 John Street, Hult House (formerly Conquest House), is a five-storey plus basement building located at the corner of Theobalds Road and John Street. The main access to the building is from John Street. The property comprises 2,087 sqm (gia). The site includes a rear patio garden, which backs onto residential properties on John's Mews.



The Application Site

- 2.2 Numbers 37-38 John Street are of a traditional design, in brick with a rusticated stone ground floor storey and regular fenestration, white painted timber sash windows and rubbed brick arches. John Street is the principal elevation and is organised under a pediment, to a total of four storeys' plus mansard roof with dormers. The building contributes to the historic and townscape character of the local area, notably the adjacent listed buildings on John Street.
- 2.3 The entrance is at ground floor level, where there is a reception area, a classroom, a staff office and a separate room for staff lockers and copier/printing resources. The remaining area of the ground floor is open plan breakout space with seats and desks. Towards the rear of the property, access can be gained to the external seating area at ground level.
- 2.4 The basement level is predominantly open plan, with tables and chairs. However, there are also two social areas and a meeting room. A coffee point is also provided at basement level.
- 2.5 The first, second and third floor levels have similar layouts. This includes a classroom, four enclosed breakout rooms, two semi-enclosed breakout spaces and a room for staff.

- 2.6 The fourth level includes an open area towards the Theobalds Road elevation (in place of the classrooms), with seating and tables. An open plan study area is also provided, along with enclosed breakout spaces, one semi-enclosed breakout space and a lab.
- 2.7 All floors includes toilet facilities, with disabled accessible toilet facilities provided at the basement, ground, second and fourth floor levels.

Surrounding Context



The Surrounding area

- 2.8 The application site is located within the Bloomsbury Conservation Area and whilst it is not itself listed; it adjoins a row of early 19th Century Georgian terraced houses in John Street which are grade II listed. Many of the adjoining terraced properties have been converted for other uses, mainly offices. On Theobalds Grove the site adjoins a similar office building (Nos 28-30) which in turn adjoins 24-26 Theobalds Grove which is occupied by Holborn Library. To the south of the site is Gray's Inn Walks Gardens. The surrounding area is characterised by a mix of commercial and residential buildings of differing ages, form and aesthetics.
- 2.9 The Bloomsbury Conservation Area Appraisal (adopted April 2011) states that the site is located within the sub area 9: Lincoln's Inn Fields / Inns of Court / High Holborn and sub area 10: Great James Street / Bedford Rows of the Conservation Area and highlights that 37-38 Conquest House makes a positive contribution to John Street and that the properties are "of consistent scale and proportions and have classically influenced detailing". The Conservation

Area Appraisal describes John Street as “*wide thoroughfares characterised by larger properties*”. The Appraisal also adds in relation to sub area 10 that “*Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street).* The Appraisal describes Theobalds Road as “*a major east-west thoroughfare which was widened in 1877-78. On the north side of the street, Nos 12-32 (even) Theobald’s Road encloses the north side of Gray’s Inn Gardens*”.

- 2.10 This part of Central London is a key area for higher education institutions and a popular place to study due to a high range of job prospects available. Some of the world’s leading universities are also located close by, including University College London (UCL); King’s College and London School of Economics (LSE). The location of the site provides Hults’ students a good level of exposure to a range of jobs and further training opportunities. The location also allows students to study business in a city with many international companies’ headquarters and start-ups.
- 2.11 The site also benefits from a high public transport accessibility level (PTAL) of 6a. The site is five minutes’ walk from Holborn and Chancery Lane tube stations and there are a number of bus stops located at Theobalds Road, some 50m from the site, providing services including buses 9, 38, 55, 243, N38, N41 and N55. Additionally, Kings Cross and St. Pancras International station are both located around 16-20 minutes’ walk away.
- 2.12 The site is located within Flood Zone 1, which means that the site is classified as land having a less than 1 in 1,000 annual probability of river or sea flooding.
- 2.13 The Camden Local Plan and the London Plan also shows that the site falls within the Central Activities Zone (CAZ)

Planning History

- 2.14 A search on the Council’s database shows the following planning applications recorded for the site:
- **PSX0104278** - Application under Circular 18/84 for the provision of a disabled ramp to the premises including the alterations to the front step entrance and front boundary

railings, as shown on drawing numbers: 98013572-P-P10A, and one unnumbered drawing. Granted 14/05/2001

- **2008/4007/P** - Alterations and extensions to the office building (Class B1) including erection of a lower ground and ground floor level rear atrium extension with roof terrace above, elevational alterations including new entrance door, ramped access to main entrance and alterations to windows on the rear elevation. Granted Subject to a Section 106 Agreement 06/10/2008
- **2009/1065/P** - Alterations including new entrance door, glazed canopy, entrance lights and removal of railings on left side of steps and provision of disabled access lift to main entrance of office building on John Street. Allowed on Appeal 15/09/2009
- **2009/1006/P** - Roof alterations, including raising roof level of existing rear toilet block and provision with new brick parapet wall, and installation of a plant enclosure with louvred screens at front and rear on main roof as an infill between existing plant room and staircase enclosure of existing office block (Class B1). Granted 12/05/2009
- **2009/1113/P** – Further alterations to existing rooftop plant enclosures, to include a new door to provide access onto the roof above the main stair core; removal of the existing key clamp and ladders and replacement with parapet walls and handrail. Granted 21/05/2009.
- **2011/0190/P** - Submission of details of proposed louvered acoustic screen to be used around plant enclosure pursuant to condition 6 of planning permission dated 12/05/2009 (ref no 2009/1006/P) for roof alterations, including raising roof level of existing rear toilet block and provision with new brick parapet wall, and installation of a plant enclosure with louvred screens at front and rear on main roof as an infill between existing plant room and staircase enclosure of existing office block (Class B1). Granted 27/01/2011
- **2011/2832/P** – Change of use from office use (Class B1) to flexible use as either office use (Class B1) and/or educational/non-residential institution use (Class D1) from lower ground floor level to fourth floor level. Granted 16/09/2011
- **2011/6078/P** - Details of proposed cycle storage area required by condition 2 of Planning Permission Ref. 2011/2832/P dated 16/09/2011 for the change of use from office use (Class B1) to flexible use as either office use (Class B1) and/or educational / non-residential institution use (Class D1) from lower ground floor level to fourth floor level. Granted 06/01/2012

2.15 The Decision Notice for planning application ref. 2011/2832/P includes four planning conditions:

1. a 3-year implementation limit;
2. the need to submit cycling storage details prior to commencement;
3. occupation times of the rear garden and amenity terrace; and

4. the development permitted shall be carried out in accordance with the approved plans.

2.16 A Section 106 Agreement was entered into by GMS Estates Limited, Hult International Business School Limited and the Mayor and Burgesses of the London Borough of Camden on 16 September 2011 in connection with the planning permission reference 2011/2832/P.

2.17 The obligations stated within the S106 were as follows:

- An Environmental Contribution of £25,000 was required. This contribution was paid by the applicant and it was confirmed by the Local Planning Authority that the obligation was discharged on 11th July 2014.
- A Business Support Plan;
- A Sustainability Plan;
- A Travel Plan; and
- A Service Management Plan.

2.18 Further details of these obligations are provided within Sections 4, 5, 6 and 7 of this Planning Statement.

3.0 THE PROPOSAL

Introduction

- 3.1 Hult International Business School has eight campuses around the world and is recognised by business education's three most prestigious international accrediting bodies: The Association to Advance Collegiate Schools of Business (AACSB International), THE Association of MBAs (AMBA), and EQUIS (The European Quality Improvement System). Hult International Business School is the first and only business school in the U.S. to achieve this triple accreditation, which is held by just one percent of business schools worldwide.
- 3.2 The application site campus at John Street has an average of 550 students every year and up to 45 staff members (including 33 full time staff), although these numbers fluctuate as staff, students and faculty rotate between different campuses. At any one time, the campus serves an average of 320 students and between 20-30 staff members.
- 3.3 The typical operation hours for the college are from 8am to 11pm on Mondays to Fridays and from 10am to 8pm on Saturdays and Sundays. The core times are 9am to 6pm weekdays. However, the facilities and study spaces remains open beyond these times for access by students to study. There is a restriction (under Condition 3 of planning permission ref. 2011/2832/P) in place which limits the use of the rear garden and amenity terraces to 0830-2000 Mondays to Fridays and 0900-1800 on Saturdays and Sundays. This is enforced by staff and security officers who ensure that the doors to the outdoor area are locked outside of these hours.

Proposed Use

- 3.4 The application seeks planning permission to retain the flexible dual use of B1 and D1 Use Classes, as permitted within the 2011 application ref. 2011/2832/P (Use Classes E and F1 in the 2020 Use Classes Order, operative from 1 September 2020). There are no changes proposed to the external or internal layout and form, therefore, the site will remain as it is shown on the submitted existing floorplans. If permission is granted, Hult International Business School will continue to use the building for D1 Use. Ancillary staff and student welfare facilities will be provided within the building for the use of the School.
- 3.5 The submitted floorplans provide details of the existing layout and arrangements. This

application will retain the current form of the building, which incorporates the latest technologies to provide teaching face to face and web-based facilities as well as allowing for the flexibility to use the floorspace for office use.

- 3.6 As detailed at Section 2, the building incorporates an auditorium/classroom located towards the Theobald's Road elevation on the ground, first, second and third floor levels. All floors includes toilet facilities, with disabled accessible facilities located on lower ground, ground second and fourth floor levels.
- 3.7 Lower ground floor: The floor forms a mostly of a flexible open space plan, with facilities including a coffee point and a kitchen, printers and storage provided for students in the form of lockers. The open plan has allowed to provide tables and chairs across the floor. However, a meeting room, is situated towards the Theobald's elevation and a semi-enclosed seating area as well as two social areas are also provided. Appendix 1 - photograph 1 shows the large social area/atrium and photograph 2 shows the coffee point. A room for storage of recycling and waste is also provided on the lower ground floor. The boiler room is also situated on the ground floor towards the Theobald's elevation.
- 3.8 Ground floor: The main entrance to the building is via John Street, which includes an access lift to the premises for wheelchair users. Please refer to photograph 3 at appendix 1 which shows the main entrance. A reception is located adjacent to the main entrance; students, staff and visitors would need to pass through the security gates in order to gain access to the building. The ground floor includes an auditorium/classroom (please refer to photograph 4 which shows a typical classroom). Additionally, the ground floor also includes a room for staff use which provides storage/locker and printing facilities. The staff office is also located on the ground floor, photograph 5 shows the staff office. The remaining space incorporates seats and tables. There is also the provision of a small garden area towards the rear of the property (please refer to photograph 6).
- 3.9 First floor, second and third: These three floors are of the same layout, which includes an auditorium/classroom, a faculty and staff room (please refer to photograph 7 which shows the typical faculty/staff room). There are four enclosed break out spaces (please refer to photograph 8 which shows the typical enclosed break out space) and two semi-enclosed breakout spaces. The remaining area incorporates seating facilities.

- 3.10 Fourth floor: The fourth floor includes a cafeteria and study area (please see photograph 9), located towards the Theobald's Road elevation. There are also 4 enclosed break out spaces, 1 semi-enclosed break out space and a lab. Access between the floors can be made via the two staircases and lifts located towards the rear of the property.
- 3.11 The first floor provides a terrace as an amenity space which is an external space and is accessed from the breakout area and from near the toilet facility. Whereas the second, third and fourth floors have balconies. The balconies are accessed of the main core and overlooks the courtyard and garden to the rear.

Amount

- 3.12 There are no external or interior changes proposed to the scheme. The floorspace will remain as existing, which is 2,087sqm. The table below sets out the floorspace on each floor.

Floor Level	GIA
Basement (lower ground)	360
Ground	295
First	369
Second	369
Third	369
Fourth	325
TOTAL	2087

Layout

- 3.13 The existing layout will be retained. The layout is flexible so that it can accommodate a change from the educational use (use class F1) to office use (use class E) uses if required, without the need to apply for planning permission for any alterations. As the submitted plans show, the inclusion of the enclosed breakout spaces, cafeteria, auditoriums and kitchen (or coffee point) makes the building suitable for both uses at any time.

Scale and Appearance

- 3.14 No changes are proposed to the scale of the existing building; and there are no changes proposed to the appearance of the building and the site which can impact the surrounding local character.

Car and Cycle parking

- 3.15 The site is car free and there are no car parking spaces associated with Hult House. There are currently 13 cycle racks on site, which can each be used to park 2 bicycles, which means cycle parking spaces for 26 bicycles is provided on site for use by staff and students. The cycle spaces will remain within the basement level, which is shielded by a wall,

Inclusive Access

- 3.16 The building is Full Part M compliant and contains wheelchair accessible facilities. The entrance to the building from John St is the main entrance and incorporates a lift from the pavement to the landing near the main door entrance. Theobald's Road is designed to be wheelchair friendly and there are lifts operating across all levels. The access via Theobald's Road is used for fire exit and for servicing and maintenance purposes. Disabled accessible toilets are also provided on basement, ground, second and fourth levels. The auditoriums include space for wheelchair users.

Sustainable Design:

- 3.17 The building was substantially renewed and refurbished immediately prior to the 2011 permission (ref. 2011/2832/P) and occupation by Hult. Preliminary and final BREEAM assessments were made on behalf of the developer. The building's performance was assessed in 2011 as Very Good. There are no external or internal alterations being proposed with this application.

Landscaping:

- 3.18 There is a small garden located towards the rear of the property and this is being maintained as existing. There are no proposed landscaping works as part of this application.

4.0 BUSINESS SUPPORT PLAN

- 4.1 The S106 Agreement which accompanied the 2011 permission included within the first schedule, the requirement to submit, prior to occupation, A Business and Community Support Plan for approval. The first Schedule stated:

“The Hult Business and Community Support Plan is intended to be a basis for promoting and supporting commerce and business development with the local community. The Occupier (in this Schedule, meaning Hult International Business School Limited only) will work closely with the Council to achieve the following objective:

- 1) *Education...*
- 2) *Facilities...*
- 3) *Business Support and Student Development...*”

- 4.2 The Hult Business and Community Support Plan was submitted to the Council on 20 December 2011. In line with the requirements stated in first Schedule of the S106 Agreement, the Business Plan outlined a number of initiatives adopted by Hult to support and provide benefits to local businesses, societies, Camden’s staff and Hult’s student body. The initiatives were broken into four elements detailed below:

- 1) **Education:** Hult developed the Executive MBA program to give global executives a flexible learning experience. Hult were prepared to offer Camden a “free” place on the programme.
- 2) **Scholarship:** Hult were prepared to work with the Borough to provide a named 100% Undergraduate scholarship (4 years’ free tuition) aimed at a student who would not have access to such education. Additionally, Hult was to work with nominated Camden employee to map out a strategy for Hult, Camden and local businesses & charities to work together to sponsor other scholarships.
- 3) **Facilities:** On completion of the project, Hult were to engage with local businesses and societies to make available to them its auditoria and video conferencing facilities when they are not in use.
- 4) **Business Support and Student Development:** Under this, Hult would provide students to actively engage with industry leaders to ensure they have access to leading professionals worldwide; Hult were also provide some spaces to both Camden’s and / or local business to the Hult’s Executive Speaker Series.

Current Status

- 4.3 Hult International Business School is continuing to provide these initiatives as set out in the letter dated 26 August 2020, attached to Appendix 2 of this Planning Statement.
- 4.4 As part of its commitment to the local community, Hult International Business School offers the Camden Scholarship. Every year, one Camden resident gets access to a fully-funded Masters in International Business. This includes practical experience with a social enterprise or small and medium-sized enterprise (SME). This initiative allows members of the community to access a world-class program in the only triple-accredited American business school (AMBA, EQUIS, AACSB). This signifies a step forward in their education that could boost their careers and prove a life-changing experience. On the other hand, incorporating students from varied backgrounds adds to the diversity that distinguishes Hult from many other business schools in the world.
- 4.5 During the past five years of the Camden Scholarship a range of students from different backgrounds have benefited. All of them have been in the 30 to 40 year-old range and the distribution between male and female beneficiaries has been balanced.
- 4.6 Hult is willing to enter into a supplementary S106 Agreement with the Council to continue to meet the obligations set out in the approved Business and Community Support Plan while the building remains as a dual B1/D1 Use (Use class E/F1 from 1 September 2020).

5.0 SERVICE MANAGEMENT PLAN

5.1 Within the Definitions and Interpretation section of the 2011 S106 Agreement, a Service Management Plan was outlined. Section 2.1.13 stated the requirement for:

“a Plan for the management of the deliveries and servicing of the Property reflecting its actual use with the objective of securing the minimisation of service vehicle and car conflicts and damage to amenity arising from such servicing and deliveries and including reference to the following...”

5.2 A number of requirements were stated under this Definition, which included details of arrangements for refuse storage and servicing if applicable.

5.3 Hult International submitted the required Service Management Plan (dated December 2011). This confirmed the following:

- Location and Layout of Servicing: There is no on site (off-street) parking or waiting bays for service vehicles and none can be created. Short term parking and servicing bays on both sides of John Street are located in close proximity to the site. Both D1 and B1 would require similar and limited levels of deliveries with serving of plant and equipment.
- Restricting on Servicing Time: Restrictions will be placed on servicing to between 08:00 and 19:00 (seven days a week) and this will be provided in writing to regular suppliers to the building. Given the type of operation proposed the duration of servicing movements is likely to be short.
- Size of Service Vehicles: The site will be serviced by small vans (and similar) from the street and there will be no requirement to serve the use proposed by lorries or articulated vehicles. Goods into the building will be similar to office use namely stationary supplies and small electronic equipment.
- Swept Paths for Vehicles Manoeuvring: Not applicable on this site.
- Nature of Goods to be Delivered: Goods into the building will be similar to office use namely stationary supplies and small electronic equipment. There will also be occasional visits to the site for garden maintenance and tree care although these are small areas with limited requirements in this regard.

- **Route from on Street Bays to the Building:** The main access to John Street is Part M complaint and therefore almost all servicing and pedestrian activity will occur through this one controlled doorway which gains access directly to the secondary street rather than Theobald's Road. The Theobald's Road access will be utilised only for occasional maintenance and renewal of roof and basement plant. The two lifts serving the building are located to the rear of the reception area giving easy access from this entrance to the whole of the building including the small external amenity areas
- **Pedestrian and Highway Safety:** All servicing will take place from existing bays along John Street which are "controlled". These can also be seen from the reception area and via CCTV coverage. Therefore, the use of the site would not engender conflict with service vehicles and pedestrians and the footways around the building are wide and well maintained. The servicing of this building will not therefore impact on safety and the operation of the public highway especially as John Street is relatively lightly trafficked.
- **Organisation of On Site Bays:** Not applicable on this site.
- **Refuse Storage:** Refuse will be stored within the building at lower ground floor level and then collected from on street by waste operatives. The waste created from the D1 use of the site will be subdivided into recyclable and other waste and collected by commercial contractors.

Current Status

- 5.4 Whilst the majority of servicing can be undertaken between 8am and 7pm, vending and sanitary maintenance services take place between 6am and 7am. Hult International Business School would therefore wish to vary the hours of the Servicing Plan to reflect this requirement.

6.0 SUSTAINABILITY PLAN

6.1 A Sustainability Plan was also required within the S106 Agreement. Section 2.1.13 set out the requirements for:

“A plan securing the incorporation of sustainability measures in the management and occupation of the Property applicable only when the Property is being used for D1 educational purposes which shall: -

- a) Be based on a Building Research Establishment Environmental Assessment Method...*
- b) Include an interim pre-Occupation review...*
- c) Measures to secure a post construction review of the Development...”*

6.2 To address the above requirement, a Sustainability Plan was submitted to the Borough Council in 2011.

6.3 As part of section (b) of the requirement, a separate Pre-Occupation Review by FHP, an appropriately qualified and recognised independent verification body was also submitted to the Council, along with the Sustainability Plan.

6.4 As part of section (c), which required measures to be put in place for a post construction review, a final submission to the Building Research Establishment Environmental Assessment was made and the assessment was also submitted to the Council.

6.5 The Sustainability Plan outlined that no structural works were required to the building for the approved proposal. As stated earlier the building had undergone substantial refurbishment prior to the 2011 permission which made improvements to the external fabric of the building to improve its sustainable development credential. Consequently, the building contained a number of sustainable features which included the following:

- The External envelope of the building upgraded to achieve modern standards of thermal efficiency.*
- Rainwater harvesting system implemented to supplies irrigation and some non-potable uses.*
- Use of Solar thermal system to preheat hot water.*
- Use of low velocity air systems to supply air with minimal energy use and heat*

exchangers recover heat from the extract.

- *Introduction of “Chilled beams” to provide silent on-floor cooling with efficient integrated up and down lighting.*
- *New WCs, showers and back of house facilities to current BCO standard*

6.6 The Pre-Occupation Review by FHP outlined that that the property received a BREEAM rating of “very good” following the refurbishments which were carried out some 12 to 18 months prior to the 2011 permission. All additional practical measures have been undertaken by Hult International Business School, including the fitting of energy efficient and conservation of water usage “white goods” within the building in order to maximise the credits in the materials category. It was confirmed by FHP that the applicant had undertaken all potential energy and water saving efficiencies within the building to attain the highest practical levels of BREEAM.

Current Status

6.7 The building was substantially refurbished prior to 2011 including new windows and mechanical and electrical services (air conditioning plant; electrical and data services). Since 2011, due to an increased demand for more private meeting rooms, a number of open breakout spaces have been enclosed across the first, second, third and fourth floors. In addition, 63 controllers from the Air Management System were replaced in June 2020, in order to manage the air supply and temperature in the building more efficiently. Two valves also had to be replaced due to wear and tear. All the parts of the system (air handling units, controllers, chiller beams, valves) are now communicating correctly and the air supply to the building is at its optimum efficiency.

7.0 TRAVEL PLAN

7.1 The Second Schedule of the 2011 S106 Agreement required a Travel Plan. Section 2.1.16 highlighted that the Travel Plan is *“a plan setting out a package of measures to be adopted by the occupier in the management of the Property applicable only while it is being occupied for D1 educational purposes with a view to inter alia reducing trips in motor vehicles to and from the Property and promoting the use of environmentally friendly transport...”*

7.2 The Travel Plan submitted in 2011 highlighted that the site has an excellent PTAL of 6b and therefore benefits from a number of public transport facilities which are in close proximity of the site. The Travel Plan confirmed that cycle storage would be provided on site.

7.3 Details on the following was provided within the Travel Plan:

- **Roles and responsibilities** – the Company’s (Hult International Business School) IT Manager will be responsible for providing full details of sustainable transport methods to students and staff. Additionally, Mr David Harris, Director of Operations for Hult International Business School, is the Travel Plan Co-ordinator for the site.
- **Current travel patterns, travel issues and site assessment** – Students, staff and visitors utilises public transport to access the site as the location is highly sustainable and provides connections to many other Central London areas within minutes. No parking facilities are available on the site and as on street parking is exceptionally limited and expensive, it dissuades people from using the facility. Safe cycle storage if provided for students, staff and visitors.
- **Objectives** – The objective of the Travel Plan was to provide the overall direction of the travel plan for both the application building and its links to the undergraduate campus
- **Targets** – The primary target of the Travel Plan was to provide information to those travelling to / from the site of transport modes available to employees and students and also seeks to improve, where, possible, opportunities for sustainable transport for staff and students. Details of public transport were to be displayed in the communal areas and the benefits of the Oyster card system and contactless card payments.
- **Actions** – A Travel Plan coordinator had been appointed. The travel plan Co-ordinator will produce a document for the Company intranet site raising awareness of local bus stops locations and bus routes and other sustainable transport locations including local cycle routes. The Company will allocate a travel plan budget for its London sites.
- **Monitoring and evaluation** – The Travel Plan will be reviewed on an annual basis and Travel Plan co-ordinator will be responsible for producing a monitoring report.
- **Financial implications** - The company will provide a budget to the Travel Plan co-ordinator and a financial sum of £25,000 was be provided as part of the implementation of the Section 106 Agreement to improving sustainable transport in the local area.

Current Status

7.4 An updated Travel Plan has been submitted with the current planning application. This states the following objectives:

- Objectives: To ensure that all students and staff at Hult International Business School are aware of its Travel Plan and the sustainable modes of travel; actively discouraging reliance on car journey to or from the site; to promote healthy lifestyles and sustainable communities; and to monitor and develop the Travel Plan over time.
- Targets: The targets will be “SMART” (Specified – Measurable – Achievable – Realistic – Timebound)
- Measures: A new Travel Plan co-ordinator has already been appointed; this is Emilce Longo, the Campus Manager. The role of the Travel Plan Co-ordinator is to ensure that the Travel Plan is delivered and that it is properly monitored; this includes tasks such as preparing, promoting and distributing the TP measures to students and staff in the via onsite advertising and orientation packs.
- Monitoring: In accordance with TfL policy, all future monitoring surveys will be i-TRACE compliant Travel Surveys.

8.0 PLANNING POLICY CONTEXT

- 8.1 The legislative starting point for the determination of a planning application is as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that the determination of an application be made in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 The statutory Development Plan for the application site comprises:
- The London Plan (2016)
 - Camden Local Plan (2017);
 - Camden Policies Map (updated May 2020); and
 - Bloomsbury Conservation Area Appraisal and Management Plan (2011).
- 8.3 Consideration has also been given to the National Planning Policy Framework (2019) and the emerging London Plan (Intend to Publish – December 2019).

The National Planning Policy Framework (2019)

- 8.4 The revised NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. Whilst not prescriptive, the NPPF is material to the consideration of all planning proposals; setting the framework for policymaking and development control and seeking to put into place a positive approach to development.
- 8.5 A presumption in favour of Sustainable development is at the heart of the NPPF. Chapter 2 of the NPPF highlights the importance of the planning system in achieving sustainable development, which involves achieving the three overarching objectives of providing an economic benefit, a social benefit and an environmental benefit. For plan making this involves seeking opportunities which meet the developments needs of their area and for decision taking, this means approving development proposals which comply to up-to-date development plans without delay.
- 8.6 Chapter 6 (Building a strong competitive economy) highlights that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Paragraph 81 of the NPPF highlights that planning policies should be flexible enough

to accommodate the needs not anticipated in the plan and allow for new and flexible working practices.

- 8.7 Chapter 8 (Promoting healthy and safe communities) outlines that planning policies and decisions should aim to achieve healthy, inclusive and safe communities. Paragraph 94 highlights the importance of providing sufficient choice of education places and that local planning authorities should take a proactive, positive and collaborative approach to meeting this need and to the development that will widen choice in education.
- 8.8 Chapter 9 (Promoting sustainable transport) highlights the role of transport in achieving sustainable development. Paragraph 103, states that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.”* Paragraph 109 adds that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 8.9 Paragraph 38 of the NPPF advises that local planning authorities should approach decisions on proposed development in a positive and creative way in order to facilitate the delivery of sustainable development and should where possible seek to approve application for sustainable development.

The London Plan (2016)

- 8.10 The application site is located within the Central Activities Zone. The London Plan seeks to sustain and enhance the area’s distinctive environment and heritage, ensure the development of office provision is not strategically constrained and that provision is made to encourage a range of occupiers (Policy 2.10: Strategic Priorities).
- 8.11 Policy 3.18 (Education Facilities) outlines that proposals which enhance education and skills provision will be supported. This includes new build, expansion of existing or change of use for educational purposes.
- 8.12 Policy 4.2 (Offices) states that the Mayor will *“support the management and mixed-use development and redevelopment of office provision to improve London’s competitiveness*

and to address the wider objectives of this Plan.” Policy 4.3 (Mixed use Development and Offices) supports mixed use office developments within the CAZ.

- 8.13 Policy 6.3 (Assessing the effects of development on transport capacity) states that development should not adversely affect safety on the transport network. Policy 6.9 (Cycling) requires that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in the London Cycle Design Standards. Policy 6.13 (Parking) states that the maximum standards should be the basis for considering planning applications. In locations with high public transport accessibility levels, car-free developments should be promoted (while still providing for disabled people).

The London Plan (Intend to Publish version, December 2019)

- 8.14 Policy GG2 (Making best use of land) *“prioritises sites which are well-connected by existing or planned public transport”*.
- 8.15 Policy SD4 (The Central Activities Zone (CAZ)) states that *“The distinct environment and heritage of the CAZ should be sustained and enhanced...The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.”*
- 8.16 Policy SD5 (Offices, other strategic functions and residential development in the CAZ) highlights that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in the majority of the areas. The policy also states that residential or mixed-use developments should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices.
- 8.17 Policy S3 (Education and childcare facilities) states that development proposals for education and childcare facilities should:
- 1) *locate facilities in areas of identified need;*
 - 2) *locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling;*
 - 3) *locate entrances and playgrounds away from busy roads, with traffic calming at entrances;*

- 4) *link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport);*
- 5) *maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures;*
- 6) *encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers;*
- 7) *ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach;*
- 8) *ensure that facilities incorporate suitable, accessible outdoor space; and*
- 9) *locate facilities next to parks or green spaces, where possible*

Additionally, the policy requires that development proposal should ensure that there is not net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need.

8.18 Policy T1 (Strategic approach to transport) states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

8.19 Policy T5 (Cycling) requires development proposals to provide at least the minimum standards, ensuring that a minimum of two short-stay and two long-stay parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the London Cycling Design Standards.

8.20 The site falls within the London Borough of Camden where higher minimum cycle parking standards apply. The relevant minimum cycling parking standards are shown in the table below.

Use Class	Long-stay	Short stay
B1 (Office)	1 space per 75 sqm	<ul style="list-style-type: none"> first 5,000 sqm: 1 space per 500 sqm thereafter: 1 space per 5,000 sqm (GEA)
D1 (Colleges and Universities)	1 space per 4 FTE staff + 1 space per 20 FTE students	1 space per 7 FTE students

Minimum cycle parking standards

- 8.21 Policy T6 (Car parking) highlights that car-free developments should be the starting point of all development proposals in places that are (and are planned to be) well connected by public transport. However, disabled parking spaces should still be provided. The maximum parking standards should be applied to development proposals (see Policy T6.2). If motorcycle parking spaces are provided, this will count towards the maximum car parking spaces. Sites which are being redeveloped should reflect the current approach.
- 8.22 Policy T6.2 (Office parking) states that office developments within the CAZ and inner London should be car-free, whilst still providing disabled parking spaces (see Policy T6.5).
- 8.23 Policy T6.5 (Non-residential disabled persons parking) requires the following standards shown in the table below to be provided, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.

	Designated bays (Per cent of total parking provision)	Enlarged bays (Per cent of total parking provision)
Education	5 per cent	5 per cent
Workplace	5 per cent	5 per cent

Non-residential disabled persons parking standards

Camden Local Plan (2017)

- 8.24 Policy G1 (Delivery and location of growth) states that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings by supporting development that makes best use of its site, whilst taking into account quality of design, its surrounding, heritage, transport and other factors.
- 8.25 Policy C1 (Health and Wellbeing) highlights that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. The Council will require development to positively contribute to creating high quality, active, safe and accessible places.
- 8.26 Policy C2 (Community Facilities) states that the Council will support the investment plans of education to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK and ensure that existing community facilities are retained recognising their benefit to the community unless a

replacement facility of a similar nature is provided or the existing premises are no longer required or viable in their existing use.

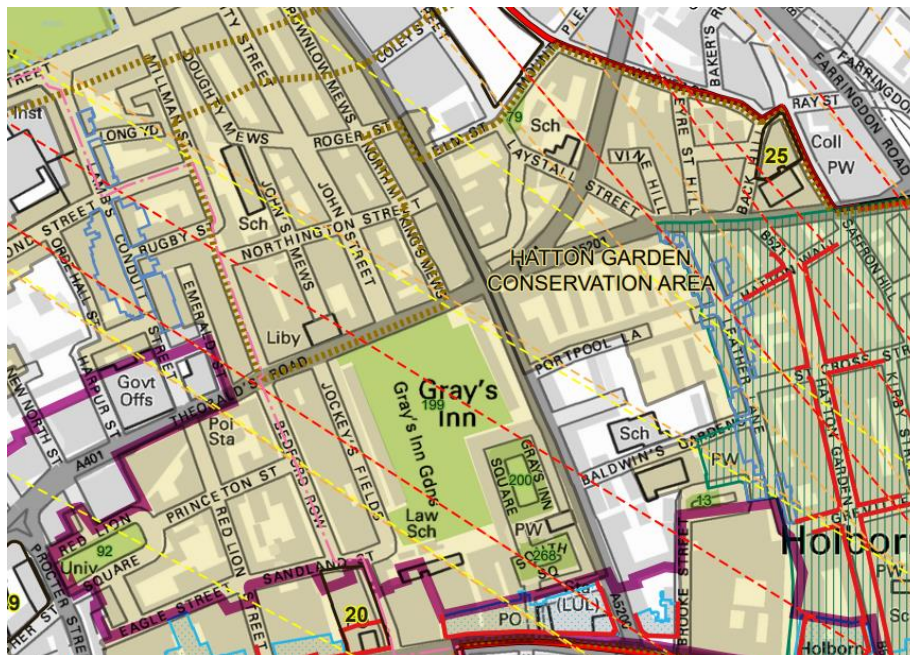
- 8.27 Policy C6 (Access for all) states that the Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design; encourage accessible public transport and secure car parking for disabled people.
- 8.28 Policy E1 (Economic development) outlines that the Council will secure successful and inclusive economy by creating conditions for economic growth. The Council will maintain a stock of premises that are suitable for a variety of business activities and support the development of Camden's health and education sectors. The Policy also states that the Council will support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of the Local Plan.
- 8.29 Policy A1 (Managing the impact of development) outlines that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected and that development contributes towards strong and successful communities and will resist developments which fail to assess an address transport impacts. Factors including transport impacts, noise and vibration levels, odour, fumes and dust will be considered.
- 8.30 Policy D1 (Design) requires developments to respect the local context and character and should contribute to preserving and enhancing the historic environment and heritage assets. Developments should be sustainable in design and construction and adaptable to different activities and land uses; comprise of high quality details and materials; integrate well with the surrounding area; inclusive and accessible to all; secure and designed to minimise crime and antisocial behaviour; incorporate high quality landscaping (e.g. planting trees and other soft landscaping); preserve strategic and local views.
- 8.31 Policy CC2 (Adapting to climate change) requires all developments to be resilient to climate change. All development should adopt appropriate climate change adaptation measures such as incorporating sustainable urban drainage features and measures to reduce the impact of urban and dwelling overheating, taking into account the cooling hierarchy. Developments of 500sqm or more is required to be supported by a Sustainability Statement.
- 8.32 Policy CC5 (Waste) requires developments to include facilities for the storage and collection

of waste and recycling.

- 8.33 Policy T1 (Prioritising walking, cycling and public transport) highlights that the Council will promote sustainable modes of transport by prioritising walking, cycling and public transport. The Council will seek to ensure that developments provide accessible, secure cycle parking facilities in line or exceeding minimum standards outlined within the London Plan.
- 8.34 Policy T2 (Parking and car-free development) states that the Council will limit the availability of parking and require all new developments to be car-free.

Camden Policies Map (updated May 2020)

- 8.35 The Camden Policies Map shows that the application site is within the Bloomsbury Conservation Area, it is affected by Designated Views and falls just outside the Archaeological Priority Area.



Extract of Camden Policies Map (2010)

9.0 PLANNING ASSESSMENT

9.1 This section of the Planning Statement provides an assessment of the proposed flexible use of the building against relevant planning policies. The key issues which will be addressed are as follows:

1. Land use – principle of development;
2. Transport, Access, Servicing and Cycle parking (including Travel Plan);
3. Amenity of neighbouring occupiers; and
4. Sustainable Development

Land Use

9.2 The application site falls within Camden's CAZ, which is identified as part of London's geographic economic and administrative core, where almost a third of all London jobs are based. The CAZ is expected to grow substantially, particularly driven by expansion of office-based businesses. The CAZ is identified as a key location to provide office employment space as well as other cultural significance. Therefore, in terms of both office and education facilities, the site is identified to be within an appropriate area.

9.3 Paragraph 121a of the NPPF highlights the importance of making effective use of sites to provide community services, such as schools, as well as identifying, within Annex 2: Glossary that offices (B1a Use Classes) are an important town centre use. The NPPF also highlights that planning policies should encourage multiple benefits of land, through mixed use schemes. Additionally, adopted London Plan Policy 4.2 supports mixed use developments. Policy SD5 of the emerging London Plan encourages the retention of offices and states that mixed-use developments should not lead to a loss of office floorspace in any part of the CAZ, unless there is no reasonable and demonstrable prospect of the site being used for office. The proposal for flexible use would allow office use to be brought back in future, should Hult relocate. It would also allow a mix of office and education uses.

9.4 In regard to the use of the building for offices, the adopted London Plan Policy 2.10 states that office provision should not be strategically constrained. It is highlighted as part of Policy 4.2 that the majority of the demand for office-based employment will be met through the CAZ. Similar to Policy 4.2, the emerging London Plan Policy E1 supports the increase in the current stock of office space and also notes that the majority of the demand for office based employment will be met through the CAZ. Policy E1 of the Camden Local Plan states that

the Council will maintain a stock of premises that are suitable for a variety of business activities. These policies show that the retention of the B1 use is supported within the location.

- 9.5 In relation to the use of the building for education purposes, the adopted London Plan Policy 3.18 supports proposals which enhance education and skills provision. The emerging London Plan Policy S3 outlines a number of criteria that education facilities should meet. These include being located in an accessible location, with good public transport facilities and where possible, located next to parks and green spaces. The application site meets the criteria of Policy S3 and it is therefore considered that the site is highly suitable for retaining the education use. Additionally, Policy S3 requires that there should be not net loss of education facilities unless demonstrated that there is no ongoing or future need. Similarly, the Borough Local Plan Policy C2 seeks to retain existing community facilities; education facilities are classified as community facilities under the Use Class D1.
- 9.6 Policy G1 of Camden's Local Plan promotes the most efficient use of land and buildings by supporting developments which make the best use of sites. In the light of the above, it is clear that the CAZ is a suitable location for both employment and education uses. Similarly, national and local plan policies support the retention and enhancements of education facilities, particularly within sustainable locations such as the application site. The flexible dual use on site will contribute to making the most efficient use of the land and buildings. Additionally, there are no specific policies within the London Plan or the Local Plan which restrict flexible dual uses. Therefore, it is considered that the proposed uses are appropriate.

Transport, Access, Servicing and Cycle Parking

- 9.7 The NPPF outlines within Chapter 9 that significant developments should be focussed in sustainable locations. Emerging London Plan Policy GG2 expands this further and states that to make the best use of land, sites which are well connected by public transport should be prioritised. Additionally, Local Plan Policy T1 highlights that the Council will promote sustainable modes of transport by prioritising walking, cycling and public transport. The application site has a high PTAL of 6b, benefitting from excellent public transport connectivity. Therefore, the proposal is supported by the NPPF, the London Plan and the Local Plan due to its location and connectivity levels.

- 9.8 London Plan policies require Transport Assessments and Travel Plans to be submitted. As the site is currently being used for education use (within an existing flexible dual use B1/D1), it is considered that the (retention) of a flexible D1 or B1 (now F1 and E) use will not result in any material changes to the existing level of usage of the transport network and therefore a Transport Assessment is not required. An updated Travel Plan is submitted with the application which outlines that the measures and objectives which have been put in place to ensure that the use of sustainable modes of transport is maximised.
- 9.9 In terms of car parking, adopted London Plan Policy 6.13 and emerging London Plan Policy T6 states that car-free developments are promoted and should be the starting point of all proposals located in areas of high PTAL, such as the application site, whilst still providing disabled parking spaces. Similarly, emerging London Plan Policy T6.2 states that office developments within the CAZ and inner London should be car-free, whilst still providing disabled parking spaces. This is also reflected in Local Plan Policy T1 which states that the Council will limit the availability of parking and require all new developments to be car-free. There are no parking spaces provide on-site or on-street for the property and staff and students are encouraged to travel by public transport. A recent survey highlighted that of the 550 students, on average two students drive to the campus and use the surrounding area to park. The majority of staff members and students therefore travel to the site using public transport facilities, or by walking or cycling.
- 9.10 In terms of cycle parking spaces, the Local Plan Policy T1 seeks to ensure that developments provide accessible, secure cycle parking facilities in line or exceeding minimum standards outlined within the London Plan. The adopted London Plan Policy 6.9 requires the provision of secure, integrated, convenient and accessible cycle parking facilities to be provided
- 9.11 For a B1 use at the site, Policy 6.9 of the London Plan (2016) requires 1 space per 90sqm for long-stay, with an additional 1 space per 500sqm for the first 5000sqm for short stay. This means that that a total of 23 long stay cycle parking and 4 short stay cycle parking is required for a B1 use.
- 9.12 For a D1 use (colleges and universities), both the adopted London Plan Policy 6.9 and emerging London Plan Policy T5 requires for long stay 1 space per 4 FTE staff plus 1 space per 20 FTE students is required; for short stay, 1 space per 7 FTE students is required. This means that as there are 550 FTE students and 33 FTE staff, long stay parking of 36 is

required. However, the premises are not occupied by all staff members and students at any one time. As stated above this increases to a maximum of 420 students and 30 staff members; which would require long stay parking of 29 cycle spaces.

- 9.13 There are 13 cycle racks provided on site, providing a total of 26 cycle spaces. Whilst this falls slightly below the requirement, Hult has advised that three members of staff and twenty students cycle to the John Street campus. As detailed in the Travel Plan, this will continue to be monitored. There are in addition Santander Cycle Stands in Theobald's Road (10 bikes) and Barclays Bikes on Theobald's Road (27 bikes) and Northington Street WC1 (20), all within an easy walk of the site.
- 9.14 In terms of servicing, Hult International Business School will continue to adhere to the 2011 Service Management Plan as detailed in Section 5 of this Planning Statement, subject to varying certain specific delivery times.

Amenity and impact on neighbouring occupiers

- 9.15 Local Plan policies seeks to protect the amenity of the neighbouring occupiers. The proposal seeks to retain the existing use, which means that there will be no material changes over how the building is currently used and no change in the noise level or the impact on air quality and matters such as overlooking. Use of the rear external area will continue to be controlled.

Sustainable Development

- 9.16 A *"presumption in favour of sustainable development"* is at the heart of the NPPF. Chapter 2 of the NPPF highlights that sustainable development includes the three overarching objectives of achieving; social, economic and environmental. The proposal meets the three objectives in the following ways;
1. Social: The retention of the dual use makes an important contribution to maintaining a highly respected and leading education facility within London's core area of growth. It will help connect students to the surrounding professional world of work and enable them to progress with other areas such as work experience. The Business school has proven its strong and beneficial connection to furthering community education for local residents and businesses.

2. Economic: The flexibility of being able to use the site as office use will continue to contribute to London's growth and help meet the identified increase in floor-space within the CAZ.
3. Environmental: The proposal makes no changes to matters such as car parking, users of the building will continue to access the site using sustainable modes of transport as no car parking facilities are being provided.

Summary

- 9.17 The proposed retention of the flexible use of 37-38 John Street for B1 and D1 (Use Class E and F1 of the 2020 Use Class Order) will ensure the ongoing use of the building and help to support the local economy.

10.0 SUMMARY AND CONCLUSION

- 10.1 Planning permission is sought for the continued flexible use of 27-38 John Street for office or education/non-residential institution use (Class E and F1 of the 2020 Use Classes Order). No material change is proposed to the interior or exterior of the building.
- 10.2 Hult House has been occupied by Hult International Business School as one of their two campuses in London, for the past 10 years. The Hult Business and Community Support Plan has encouraged the use of the school's facilities including lecture theatres and the Video Conferencing suite by local societies and business when available. Local businesses and community groups have also been invited to speaker series and themed guest lectures. The Business School has also supported scholarships for local Camden residents and forged strong links with Camden Chamber of Commerce and other networking groups.
- 10.3 The proposal to retain the flexible use of the property would allow their continued occupation of the property for education purposes, or if they were to move out, a return to an office use. Both uses would contribute significantly to Camden's economy and to supporting the local area. The site is highly accessible and within walking distance of a range of public transport services.
- 10.4 As previously, Hult International Business School would agree to enter into a Section 106 Agreement to ensure that the proposals would not impact upon the local community and wider environment. An updated Travel Plan has been submitted with the application, and Hult would meet the requirements of the Servicing Management Plan (subject to varying the times of deliveries) and Business Support Plan.
- 10.5 The proposed flexible uses would encourage optimum use of the property and maintain the vitality and diversity of this important Central London Location and CAZ. The proposed flexible planning permission will provide the Council with reassurance that should the education use no longer take place, the building, and/or floors can be sub-let for office use or returned to office use in full. Both of the proposed uses are complimentary and can co-exist alongside each other if required and will not have a harmful impact on the immediate and wider area. Given the likely reduction in demand for office space due to more flexible working and home working, there is likely to be a reduction in demand for offices so having flexible use will help to ensure that the building remains in use.

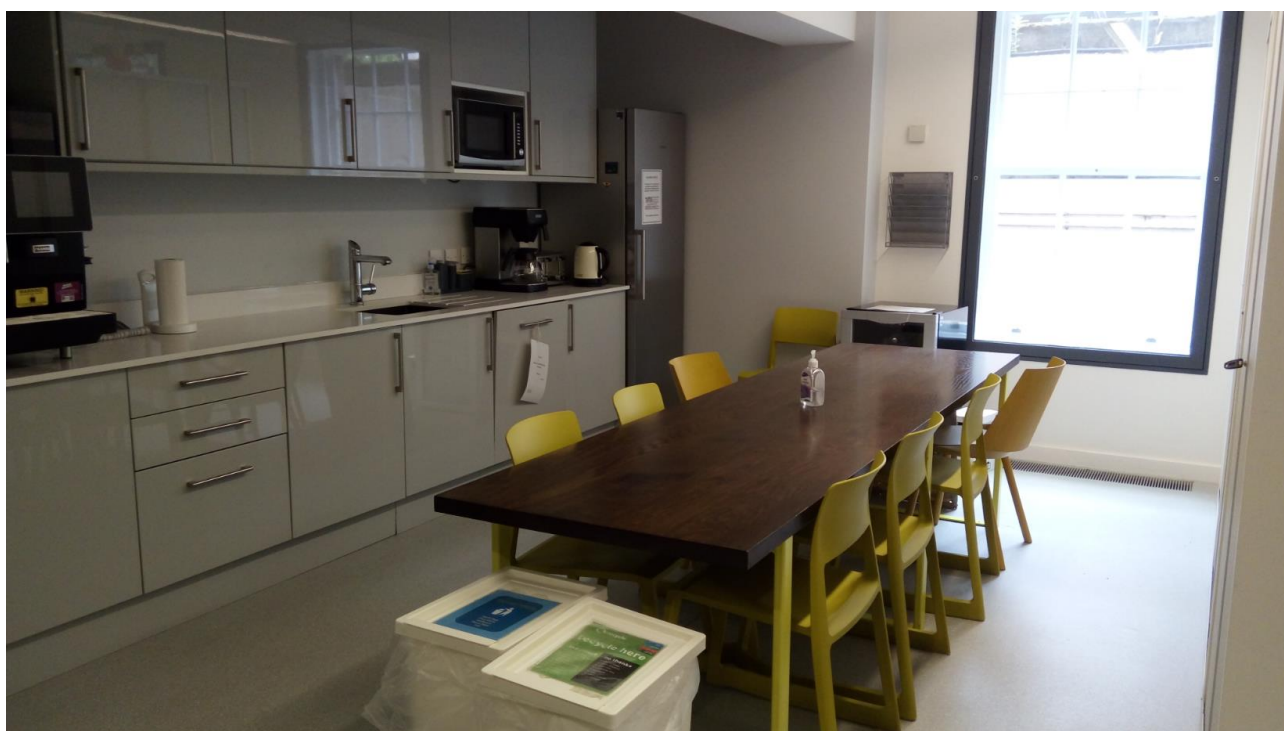
- 10.6 As no changes are proposed to the building externally (or internally), there will be no impact on the Bloomsbury Conservation Area; the local character of the surrounding area or on the Designated Views.
- 10.7 A review of National and Local Plan policies supports the proposed flexible uses as they will contribute to providing economic as well as social and community benefits. Without the new permission, the use of the building would automatically revert to the current use (education) which would preclude the use of the property for offices in the future. However, under the terms of Hult's lease, if planning permission were not granted, it would be necessary to return the building to its former use, which would mean that the building could no longer be used for education purposes.
- 10.8 It is therefore requested that planning permission be granted for the retention of the flexible office and education/non-residential institution use (Class E and F1 of the 2020 Use Classes Order).

APPENDIX 1 - SITE PHOTOGRAPHS

Photograph 1 – Atrium



Photograph 2 – Coffee Point / Kitchen



Photograph 3 – Main Entrance



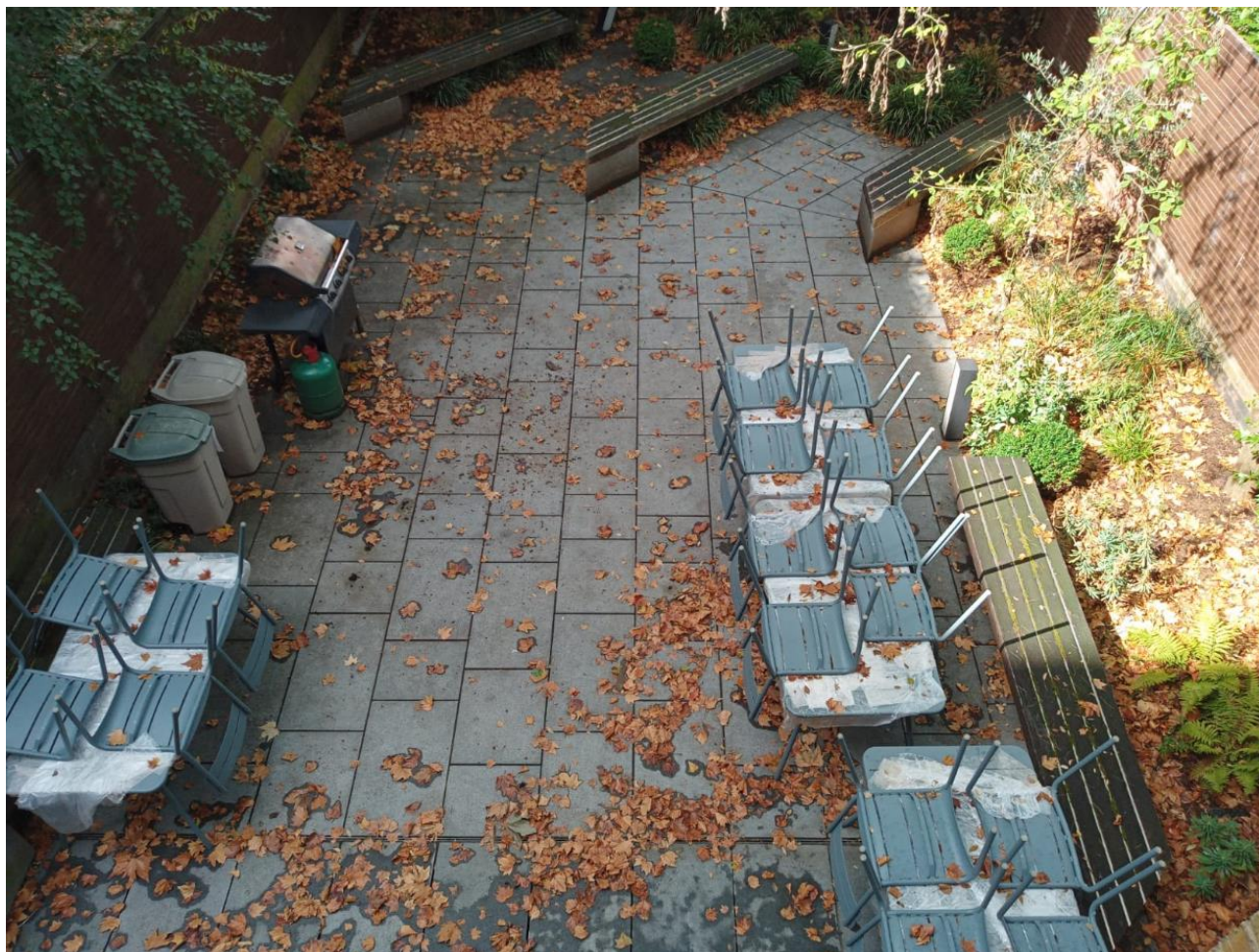
Photograph 4 – Typical Classroom



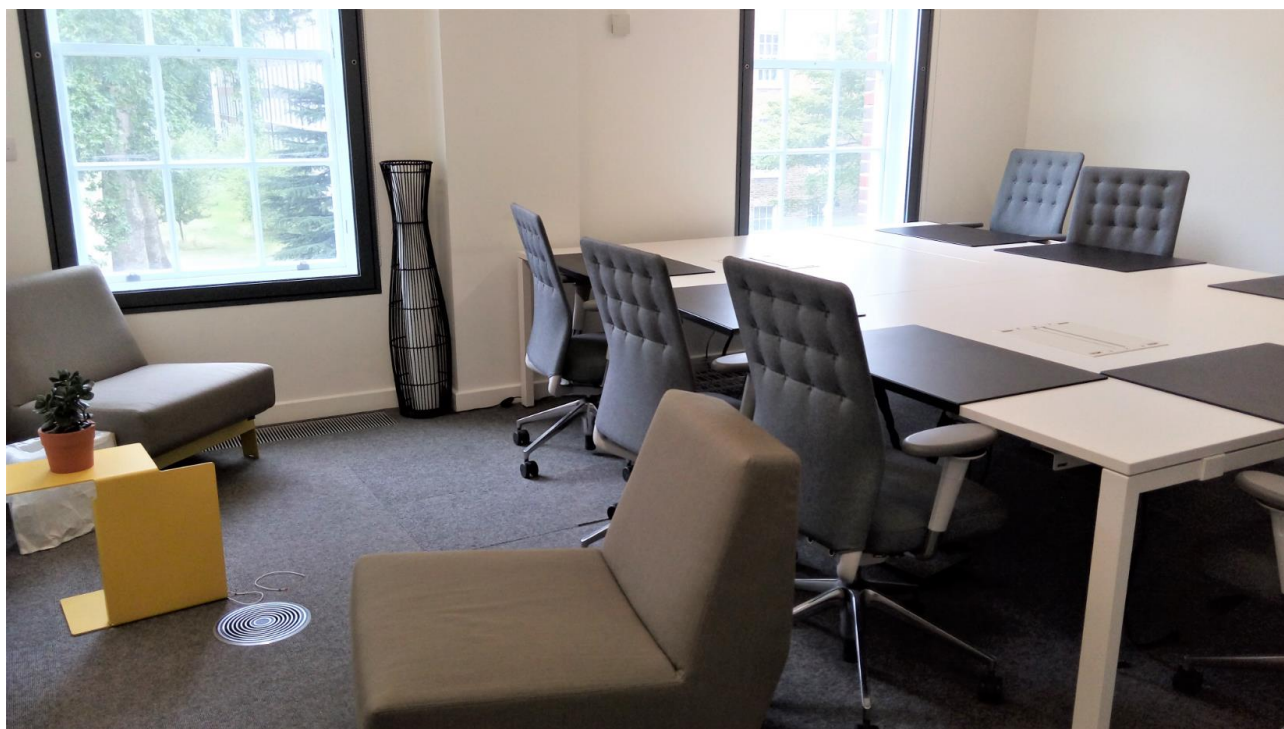
Photograph 5 – Staff Office



Photograph 6 – Rear Garden



Photograph 7 – Staff Room



Photograph 8 – Typical Enclosed Break Out Space



Photograph 9 – Cafeteria and Study Area



APPENDIX 2 - BUSINESS AND COMMUNITY SUPPORT PLAN LETTER

August 26, 2020

Dear Sir/Madam,

Hult International Business School is a global institution that transforms lives by providing valuable education that brings together people, cultures and ideas from all around the world. The School encourages personal growth, intellectual integrity, global sensitivity, local engagement, and civic values, so that students can flourish in the global economy and are empowered to contribute meaningfully to their business and community. Hult is proud to be the only triple-accredited American business school in 2020 (AMBA, EQUIS, AACSB).

As part of its strategy, Hult's London Postgraduate campus engages with a number of external stakeholders including the London Borough of Camden in order to fulfill its Community Support plan. Hult recognises the London Borough of Camden as one of its key external stakeholders and has therefore collaborated with the Borough on a number of initiatives to benefit local businesses, societies, Camden staff and Hult's student body. These initiatives fit into four distinct timelines and categories.

1. Education

Hult has developed the Executive MBA program to give global executives a flexible learning experience so that they do not have to put their careers on hold. This unique gives students the toolkit to deepen their knowledge in key areas of business, while evolving their approach to the field and establishing the student as a major player in business.

In line with the commitment made in 2011, Hult has awarded a free place on this program to a Camden resident, who is currently taking classes on the Executive MBA program.

2. Scholarship

Every year, Hult offers the Camden Scholarship. Through this benefit, one Camden resident gets access to a fully-funded Masters in International Business. This includes practical experience with a social enterprise or small and medium-sized enterprise (SME). This initiative allows members of the community to access a world-class program. This signifies a step forward in their education that could boost their careers and prove a life-changing experience. On the other hand, incorporating students from varied backgrounds adds to the diversity that distinguishes Hult from many other business schools in the world.

During the past five years, the Camden Scholarship has been awarded to British citizens from different backgrounds. All of them fell between the 30 to 40 year-old range. The distribution between male and female beneficiaries has been balanced.

3. Facilities

Every year, Hult welcomes a number of local organisations that make use of the auditoriums and meeting spaces on campus. As an example, One Degree is an education charity based in London that has been working with Hult since 2014. They offer volunteer opportunities for postgraduate students to mentor secondary school students while on their masters. One Degree uses campus facilities one or twice per year to host their training sessions for volunteers. Hult students are encouraged to participate in this initiative as a way to engage with the community. In turn, this is a networking chance for Hult students to meet other volunteers who are professionals from all sectors - CEO's, entrepreneurs, finance, banking, health, media, etc.

4. Business Support and Student Development

As a global leader in education, Hult recognises the importance of providing students with the opportunity to learn from and network with top business leaders from around the world. Our Careers and Alumni & Corporate Relations teams actively engage with industry leaders as well

as regional CEOs to bring into campus an impressive array of guest speakers. Many of these speaker events are open to the community.

Our faculty are also encouraged to enrich their classes with the participation of guest speakers from different industries, which the students greatly appreciate.

Through Hult's Clubs & Societies program, our masters students regularly engage with local businesses and potential investors. These networking occasions often lead to business relationships.

With gratitude,

Dr Samineh I. Shaheem

Dean & Executive Director, Graduate Programs

Hult International Business School

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IEMA Transforming the world
to sustainability



RTPI
Chartered Town Planner