MADDOX PLANNING

LONDON & MANCHESTER 0845 121 1706

Planning Department Camden Town Hall Extension Argyle Street London WC1H 8EQ

18 May 2021

19 BLOOMSBURY SQUARE: APPLICATION FOR CHANGE OF USE TO CLASS E FROM FLEXIBLE OFFICE/ EDUCATION USE (CLASS E/ F.1)

Dear sir or madam

On behalf of our client, Strachey Rooms LLP, please find enclosed a full planning application for a change of use of the property of 19 Bloomsbury Square, London, England, WC1A 2NS. The description of development associated with the proposal is as follows:

"Full planning application for the change of use of 19 Bloomsbury Square from a flexible office/educational use (Class E/F.1) to flexible office/medical use (Class E) on all floors."

SITE HISTORY

Application reference	Description of development	Decision
PS9904715	Change of use of the basement and the ground floors from use as offices (Class B1) to a mixed use for office purposes (Class B1) and educational purposes (Class D1), as shown by one A4 plan of basement and ground floor. Granted (permission personal to applicant).	Approved 26 October 1999
2011/1355/P	Retrospective change of use of offices (Class B1) to an alternative use of either offices (Class B1) or a	Approved 10 May 2011

language school (Class D1) at first,	
second and third floor.	

The site was granted planning permission in 2011 (2011/1355/P) for use as either offices or as a language school at first, second and third floor for a period of 10 years. The application was approved in May 2011, therefore as of May 2021 the current use will become the lawful use at first, second and third floors.

The officer's report for 2011 permission confirms that the basement and ground floors had been used for educational purposes since 1999. However, the 1999 permission (PS9904715) includes a condition that means the permission is personal to Jennifer Gammell of Colby College UK, which states that once she vacates the premises would revert to office use. Nonetheless, as the basement and ground levels have been in educational use since 1999 (regardless of the occupier) then the lawful use was established as educational use given more than 10 years has passed.

Therefore, taking account of the amended use class order, the existing uses of the building are education use at basement and ground floors (unrestricted Class F.1) and flexible office / education use (Class E and Class F.1 - restricted to office and educational use only due to wording of the decision notice for planning permission 2011/1355/P) at first, second and third floors.

PROPOSAL

The proposal seeks planning permission for change of use from education use on basement and ground floors and flexible office/education use at first, second and third floors to Class E use on all floors.

A medical use is required for the new tenant, a private practice providing talking therapies with adults and children. Therefore, the applicant seeks to change the lawful use of the property to a flexible Class E use in order to operate the talking therapies private practice from. There are no external or internal alterations proposed. It is proposed to restrict the Class E use to either medical use or office use to ensure the property can be occupied flexibly in the future, depending on demand.

KEY CONSIDERATIONS

Camden's Local Plan defines the term 'community use' to refer to a wide range of social infrastructure that provides a service to the community, including education, adult learning and training and healthcare. The existing use is flexible office and education use therefore, policy C2 is applicable to the proposed development. Camden's Policy C2 Community Facilities states that existing community facilities should be retained unless one of the following tests are met; a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users; or the existing premises are no longer required or viable in their existing use. In this case, the first test is met as the proposed community facility provided in the form of a medical/ healthcare facility is proposed to replace the existing educational use. As such, the replacement use is provided in order to meet the needs of its intended users.

Further to this, Camden's Local Plan supports the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter. The Knowledge Quarter comprises the general area of King's Cross, Euston Road and Bloomsbury. Considering the proposed medical use situated in the Bloomsbury area, coupled with the highly accessible location of the site allowing for sustainable travel to the community facility, it is considered the site is suitable for a medical use.

It is considered that the proposed Class E (medical) use is in line with the surrounding land uses around Bloomsbury Square. In addition, the proposed change of use provides a replacement community facility, as required through Policy C2, in the form of a medical/ healthcare facility.

The site is located in Camden's Central London Area and is situated within the London Plan Central Activities Zone (CAZ). The CAZ is a major business and employment area. Camden's Policy E2 Employment premises and sites states that the Council will encourage the provision of employment premises and sites in the borough and will protect premises or sites that are suitable for continued business use and premises that support the functioning of the Central Activities Zone (CAZ) or the local economy.

The site is located in an area with PTAL rating 6b (best) and is situated within an area identified to encourage the provision of employment premises, therefore it is considered that the proposed office use is acceptable. Furthermore, the site is already in flexible office/educational use. Therefore, the proposed use of the site as an office is a continuation of the current use.

The site comprises one of five Grade II listed terrace houses, 18-22 Bloomsbury Square. The site is also located in Bloomsbury Conservation area and is situated within the London Suburbs Archaeological Priority Area. Policy D2 Heritage states that the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

There are no internal or external alterations proposed that would impact the historic fabric of the building. As such there will be no loss of or substantial harm to the designated heritage asset and the proposal would conserve both the listed building and conservation area. Therefore, it is considered that the application is in line with Policy D2 and Listed Building Consent is not required as a part of this application.

Local Plan Policy A1 Managing the impact of development seeks to protect the quality of life of occupiers and neighbours through ensuring that the amenity of communities, occupiers and neighbours is protected. As noted, there are no external alterations or extensions proposed, therefore there will be no impacts to outlook, visual privacy and daylight and sunlight levels. Given the existing and proposed uses are of similar nature, it is considered that there will be no impact to noise levels. There is no external lighting proposed as a part of this application therefore there will be no impact to artificial lighting levels. In addition, the neighbouring properties are in commercial use, meaning there are no residential neighbours immediately adjacent to the site that would be impacted by the proposed change of use. It is considered that the proposal is in line with surrounding land uses and the application to change the use to Class E (office or medical) would not result in any adverse impact to neighbouring amenity.

Policy A1 considers transport impacts affecting communities, occupiers, neighbours and the existing transport network. The proposed use is of a similar nature to the existing community use and office, as such it is considered that the change of use comprising medical, or office would have a negligible impact on the surrounding transport network.

The site is situated in a highly accessible area with a PTAL rating 6b (best) with Holborn Underground station located circa 6 minutes away on foot (514m) and Tottenham Court Road Underground station located circa 9 minutes away on foot (760m). Policy C2 Community facilities recognises that access to community facilities is a vital part of the infrastructure supporting Camden's quality of life. The Council will seek to ensure that community facilities and services are developed and modernised in a way that is sustainable and retained for the benefit of communities in Camden. Given the accessible nature of the site, it is considered to be a wholly appropriate location for a flexible medical/office uses.

Please find the following documents enclosed:

- Application form;
- Site location plan;
- Existing plans;

- Proposed plans; and
- Application fee of £462.

I trust this application is clear, however please do not hesitate to contact me should you wish to discuss any matter raised within this submission.

Yours sincerely

TARA FITZPATRICK PLANNER

t: 0845 121 1706

cc: Strachey Rooms LLP