



**BLOOMSBURY
ASSOCIATION**

ÉCOLE JEANNINE MANUEL

21-24 RUSSELL SQUARE, LONDON WC1B 5EA

Proposal: Renovation and amendments to the existing listed buildings, demolition and replacement of the modern extension to no. 23 with a new extended basement and single-storey new building and landscape works to the external areas including the vacant adjacent site.

Application for planning permission: 2021/2019/P

Application for listed building consent: 2021/2443/L

14 June 2021

The Bloomsbury Association cautiously supports these applications for the further expansion of École Jeannine Manuel in Bloomsbury and wishes to make the following comments.

1. We say 'cautiously' because, disappointingly, there has been no pre-application engagement with the local community on this proposal in accordance with the expectations of paragraph 40 of the National Planning Policy Framework. Nevertheless we now understand the strategic intent is to relocate the school's primary pupils from Bedford Square to the new buildings at 20-24 Russell Square so they may benefit from their additional space and facilities; older pupils will then occupy existing school buildings on Bedford Square. So, overall, this is a proposal to further expand the school in Bloomsbury while retaining the existing Bedford Square and Russell Square accommodation and significantly reducing traffic impact in Bedford Square. The synergy of the whole is of greater benefit than the constituent parts and has our support.
2. That said, the new assembly/dining hall proposed to the rear is not 'single storey' and it is misleading to describe it as such. It appears overly bulky and we concur with the BCAAC that, at the height proposed, it could dominate the space and have a damaging affect on the character of the Bloomsbury Conservation Area and the setting of adjoining listed buildings. This would be contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework.
3. The university has created a lot of inappropriate development here in the past and this proposal adds to it in a fairly mediocre way, rather than attempting to complement or enhance the very different architectures surrounding it. If it could hide behind the ivy clad, perimeter wall, that would be fine, but this goes much higher, introducing a new form, a new aesthetic and a completely new palette of materials that differs from both Lasdun's Institute of Education and the picturesque qualities of the bow-fronted rear elevations of the host buildings. As the 20C Society say: "*The scars of that battle remain visible today in the juxtaposition of Woburn Square's remaining Georgian terraces with Denys Lasdun's Brutalist buildings*". This new eclecticism could extend those scars further, something that is aggravated by the additional bulk and height of the enclosed rooftop 'external curriculum space' and the stair that serves it. We suggest this rooftop expression needs to be considered further by the applicant.
4. Beneficial use of the former site of 20 Russell Square is welcomed. We are disappointed no attempt has been made to enclose or cover the recreational space by bridging the gap between two distinctly different architectural expressions in order to make it usable throughout the year. The east elevation of the exposed flank wall of 21 Russell Square, with its buttresses, is a disaster and could be improved, at least as a living wall of planting. To ignore it and leave it as existing does not meet the design criteria set by policies D1 and D2 when there is the

opportunity for a more adventurous architectural solution that enhances the settings of 21-24 Russell Square and the Institute of Education.

5. There is significant and well-established planting to the rear wall separating the application site from the ramp serving the Institute of Education's basement. It appears from the proposed landscape plan, drawing 2676_19010 rev P2, that this existing landscaping is to be removed and not replaced, which is unfortunate. The question arises: does this ramp still serve any useful purpose or could the open space to the rear of the school be extended further to bring more beneficial use to this space? Could the ramp also serve as set-down / pick-up space for arriving and departing pupils?
6. We would be concerned if the School were to also use Russell Square, Woburn Square or Gordon Square for recreation purposes in the same way that they currently use Bedford Square and Malet Street Garden. These sensitive garden landscapes cannot take such intense use and what little remains of the landscaping to Malet Street Garden has been severely damaged. A restriction should be imposed, either through condition or s106 obligation, limiting the use of Russell Square, Woburn Square and Gordon Square for school recreational activity.
7. This is not a like for like use. Although falling within the same use class, the impact of a primary school is very different to that of higher education. This was learnt the hard way when École Jeannine Manuel first opened six years ago in Bedford Square through the same disjointed process of developing a building with an established D1 use class, in a location that was not appropriate, and arguing afterwards about how to resolve the harmful transport affects caused. This process is repeated again here and Camden must be very careful not to allow the same mistakes to also be repeated.
8. Traffic generation is the key issue, which is hardly mentioned in the application, and is the key reason for our caution. Officers should be aware that this is not a local school but a school with a London-wide catchment. A Travel Plan addressing this, if not required through change of use, should be offered voluntarily through a legal agreement in recognition of the role that the school should be willing to play as part of, rather than apart from the local community. The existing school Travel Plans should be revised to consider all the school's Bloomsbury sites and, in particular, to address the impact of school coaches and parents' cars on Russell Square. It should also consider the transfer of the infant and junior school streams on travel to/from the other school buildings.

Will this proposal take some of the intense vehicle trip generation off Bedford Square and transfer it to Russell Square, taking all associated traffic problems with it? How this will be resolved in traffic terms is not explained. Where will all the coaches park? Where will all the parents' cars park? Will Russell Square have to become another Healthy School Street project to manage the anti-social behaviour of drivers? The Access Statement and Transport Statement included in the D&AS are totally inadequate in this respect and the applications should not be decided without further information being provided by the applicant.
9. Similarly, there should be a Servicing Management Plan to explain how food deliveries and waste are going to be dealt with, which will be substantial. Again, the Access Statement and Transport Statement included in the D&AS are totally inadequate in this respect and the applications should not be decided without further information being provided by the applicant.
10. There is an absence of any convincing analysis and proposals for travel and servicing management arising from the intensification and type of educational use. On the basis of information currently provided in support of the application, this proposal would potentially represent a departure from the objectives of Policies T1 and T3 of the Local Plan sufficient to warrant refusal. A Travel Plan should be required, together with a contribution towards any highway improvement works necessary to create a safe and healthy environment for arriving and departing pupils and to minimise any disturbance to neighbours.

We would be grateful if you would let us know of any further modification to the applications; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:

Patrick Marfleet, London Borough of Camden
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Thomas Prévot, École Jeannine Manuel
Bloomsbury Conservation Area Advisory Committee
The Trustees of Russell Square
Chair, 20C Society
Chair, Bloomsbury Association