

# 1 & 1A MONTAGUE STREET, LONDON WC1B 5BP

## PLANNING STATEMENT

APPLICATION FOR FULL PLANNING PERMISSION

NOVEMBER 2021



# CONTENTS

1.0 EXECUTIVE SUMMARY ..... 3

2.0 INTRODUCTION AND BACKGROUND ..... 4

3.0 APPLICATION SITE AND SURROUNDINGS ..... 6

4.0 DEVELOPMENT PROPOSALS ..... 9

5.0 PLANNING POLICY FRAMEWORK ..... 11

6.0 PLANNING POLICY ASSESSMENT ..... 13

7.0 CONCLUSIONS ..... 188

APPENDIX 1: THE AA’S HISTORY AND REPUTATION

# 1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the application for planning permission ("the Application") submitted by The Architectural Association Inc. ("the AA", "the Applicant") to the London Borough of Camden ("LBC") for the conversion of offices at Nos. 1 & 1A Montague Street, London WC1B 5BP ("the Site" / "the Building"), to provide higher educational space.
- 1.2 The subject Building forms part of a group listing relating to Nos. 1-1A Montague Street which is Grade II listed. The Site is also located within the Bloomsbury Conservation Area.
- 1.3 The Proposals are for the temporary change of use of the Building at 1 & 1A Montague Street which is currently in office use (Class E), to space which can be used by the AA as a teaching facility with associated study areas and back-of-house functions.
- 1.4 The AA is a well-regarded employer, tapping diverse and skilled talent from across greater London and abroad, and providing a stimulating, convivial environment for its community. The AA's relationship with, and contribution to, the locale and the Borough is reinforced by many local practices set up by AA alumni, namely Cullinan Studio (Baldwin Terrace, Islington), vanHeyningenHaward (Harmood Street), Fletcher Priest Architects (Middlesex House), Ron Arad Associates (Chalk Farm) and Alison Brooks Architects (Highgate Studios), and many others.
- 1.5 Occupying this type of historic building is familiar to the AA and is important to them to maintain the consistent character between the buildings they occupy across the Bedford Estate. It is very much part of their identity and is part of that established reputation and identity which attracts students and staff to work with the AA. The AA is pleased to occupy these buildings to help secure a sustainable use for the heritage assets and offers a viable alternative given the lack of interest to occupy the building as a full office space.
- 1.6 At this juncture, the AA does not wish to make any physical changes to the Building to facilitate this change of use. The Applicant wishes to occupy the building for ten years in the way described in this planning statement and shown in the Proposed layout drawings.
- 1.7 The marketing exercises undertaken in the last two years to let the Building for office use demonstrate the lack of interest in the Building and the redundancy of the building for office use.
- 1.8 The Council's position on the loss of small office space within CAZ is recognised thus this Application is made for the temporary change of use to an educational establishment. This would be secured through a reversionary condition.
- 1.9 The Proposals have been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 1.10 Having regard to the assessment undertaken within this Statement, we consider the benefits arising from these Proposals can be summarised as follows:
- The occupation and upkeep of two Grade II listed buildings by an institution that has an established reputation in the Borough and that makes a significant contribution to the cultural identity of this part of Camden;
  - The provision of employment opportunities for c. 50 staff and support staff who would benefit from the conversion of the property; and
  - The consolidation and growth of an important institution with deep connections to the Bloomsbury Conservation Area having occupied Grade I listed buildings in Bedford Square for more than 100 years.
- 1.11 Given that there is no long-term impact upon the office supply within CAZ and the benefits of safeguarding the future of this heritage asset we respectfully request that LBC grants planning permission for the proposed temporary change of use.

## 2.0 INTRODUCTION AND BACKGROUND

- 2.1 This Planning Statement forms part of the application for planning permission (“the Application”) submitted by the Architectural Association Inc. (“the Applicant”) (“The AA”) to the London Borough of Camden (“LBC”) for the conversion of the office space at Nos. 1 & 1A Montague Street, London WC1B 5BP (“the Site” / “the Building”), to provide higher educational space.
- 2.2 The Applicant seeks planning permission for the following description of development (“the Application”):
- “Temporary Change of use from offices (Use Class E) to higher education use (Use Class F1).”*
- 2.3 Permission is sought for the temporary change of use to higher education use (Class F1) for a period of ten years, after which the use will revert back to office use (Class E). This will be secured through a revisionary condition, ensuring that the long-term supply of small-scale offices within the Central Activities Zone is not permanently lost.
- 2.4 The Application is being submitted on behalf of the Architectural Association School which has been resident in Bedford Square for 100 of its 174-year history. Alongside its significant contributions to architectural education and improvement of the built environment, the School has long contributed to the cultural life of London by hosting a public programme of evening lectures, exhibitions, and events free and open to all. The use of this building will allow the AA to expand its operation and outreach.
- 2.5 The AA is a well-regarded employer, tapping diverse and skilled talent from across greater London and abroad, and providing a stimulating, convivial environment for its community. Its students frequent area shops, cafes, and services, contributing to the vitality of local businesses and the character of the area in this part of Bloomsbury. A short statement on the history and work of the AA is included at **Appendix 1.0**.
- 2.6 The AA also organises community outreach programmes such as the ‘Little Architect’ programmes for the benefit of local schoolchildren, contributing to learning and access to diverse communities in London.
- 2.7 The AA wish to occupy the Building for a period of ten years as part of their current plans for the expansion and growth of the School and have identified this Building as suitable for their needs on a medium term basis. The exact details of their occupation and why this Building has been identified to suit their needs is set out in more detail in Section 4 of this report.

### **Purpose and format of the Planning Statement**

- 2.8 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.
- 2.9 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the information gathered in support of the AA’s aspirations to occupy the Building and, having regard to these, provides a balanced planning assessment of the merits of the proposals in terms of how this change of use will affect the land uses in the area.
- 2.10 The scope of supporting information has been established with regard to the national and local list requirements.
- 2.11 A Document Schedule has been prepared for the Application. **Table 1.1** confirms the project team responsible for each matter:

**Table 1.1 – Schedule of Application Submission Documents**

DOC REF	NAME OF DOCUMENT / FILE	AUTHOR
(1)	Application Covering Letter	Montagu Evans
(2)	Application Form: Full Planning	Montagu Evans
(3)	Community Infrastructure Levy	Montagu Evans
(4)	Site Location Plan	Montagu Evans
(5)	Proposed Layout Drawings – The AA Space Audit	The AA School
(6)	Planning Statement (i.e this document)	Montagu Evans

2.12 **Section 3** of this Statement provides background information on the Site including its planning history. **Section 4** sets out details of the Scheme. **Section 5** summarises the planning policy relevant to the Site. The Proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

# 3.0 APPLICATION SITE AND SURROUNDINGS

## Application Site

- 3.1 The Site is located within the administrative area of the London Borough of Camden ("LBC"). It is situated within the south of the Borough, with the boundary to the City of Westminster to the west and south of the Site. The site area comprises approximately 702 sqm including the private garden. A Site Location Plan is enclosed within the submission.
- 3.2 The Site forms part of the Grade II listed terrace running south-north. The property was built in the early 1800s, as a residential townhouse. The Building, which forms part of a series of 11 Georgian terraced properties, originally comprised of four storeys and basements with 3 or 4 windows on each level.
- 3.3 The Site is also located within Bloomsbury Conservation Area. A large proportion of buildings / spaces within this area are listed, which includes the opposite terrace on Montague Street, The British Museum (Grade I) and Bloomsbury Square and Russell Square Gardens, (both Grade II).

## Site Specific Designations

- 3.4 The Site is the subject of the following designations under the LBC Policies Map (August 2021):
- Central London Area (i.e. Central Activities Zone);
  - Bloomsbury Conservation Area;
  - Archaeological Priority Area; and
  - Metropolitan Walk.

## Surrounding Area

- 3.5 The surrounding area is characterised by a variety of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location.
- 3.6 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. The Conservation Area is most renowned for its history of strong literary and publishing connections associated with the Bloomsbury Group.
- 3.7 The terraced houses extends both north and south of the Site. Southbound leads onto Great Russell Street which runs between Tottenham Court Road (part of the A400 route) in the west and Southampton Row (part of the A4200 route) in the east.

## Heritage

- 3.8 The Building forms part of a group listing relating to Nos. 1-11 Montague Street (and attached railings) which is Grade II listed.
- 3.9 The list entry (ref. 1322131) states:

*"Terrace of 18 houses. c1803-6. By James Burton. Built by WE Allen, altered. Yellow stock bricks with stucco ground floors. Stucco sill band at 3rd floor level. Nos 15-17 and Nos 22 and 23 slightly projecting. Gateway to rear gardens (qv) between Nos 20 and 21. 4 storeys and basements. 3 windows each. Round-arched doorways with reeded door frames or sidelights, mostly 2-leaf doors; Nos 17, 20, 21, 22, 24, 25, 27, 28 and 29 with patterned fanlights. No.13, door replaced by window. No.19 with mosaic top doorstep with words "White Hall". Gauged brick flat arches to recessed sash windows, most with original glazing bars. Nos 18, 19 and 20 with glazing bars forming patterns of octagons, squares and ladders, to sides of panes, on ground and 1st floor. Nos 21 and 22 with patterned glazing*

*bars to ground floor and No.26 to 1st floor. 1st floor windows with cast-iron balconies. Parapets. Rear elevations of Nos 25-29 with bowed bays.*

*INTERIORS: not inspected.*

*SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas."*

3.10 The Site forms part of the Bloomsbury Conservation Area which contains a number of historic buildings and designated heritage assets. Montague Street itself is built up of terraced townhouses of four storeys in height which are also the predominant building type on the larger conservation area. It is in close proximity (within 100m) to the following assets:

- Nos. 12-29 Montague Street and attached railings including Montague Hotel (Nos. 12-20) (Grade II);
- No. 29A Montague Street and attached wall, railings and lamps (Grade II);
- No. 30 Montague Street and attached railings and lamps (Grade II);
- Nos. 38-43 Montague Street and attached railings (Grade II);
- The British Museum (Grade I);
- Nos. 44-49 Russell Square and attached railings (Grade II);
- Nos. 74-77 Great Russell Street and attached railings (Grade II); and
- Pair of K6 telephone kiosks flanking side entrance pier and gates (Grade II).

### **Accessibility**

- 3.11 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes.
- 3.12 The nearest London Underground station is Russell Square (Piccadilly line) located approximately 400 metres north east of the Site, with Holborn (Central and Piccadilly lines), located approximately 450 metres south east and Tottenham Court Road (Central and Northern lines), located approximately 450 metres south west of the Site.
- 3.13 Being situated within north London, the Site is also located within close proximity to both London King's Cross and Euston, with all other national rail stations in London accessible via its excellent Underground links.
- 3.14 The Site is highly accessible to London's bus network. The nearest bus stop is approximately 50 metres from the Site along Montague Street. In addition, approximately 250 metres south of the Site is Bloomsbury Way (A40) bus stop (with 21 routes operating).

### **Planning History**

- 3.15 A planning history search of LBC's online planning register was undertaken, and the following applications are considered to be of relevance.
- 3.16 On 5 July 2019, planning permission and listed building consent (refs. 2018/6288/P & 2018/6263/L) was granted for *"Amendments to planning permission 2017/4112/P dated 15/05/2018 for external and internal works to office buildings NAMELY installation of four new openings for ventilation ducting in the roof of the single storey rear extensions at nos. 1 and 1A, installation of cast iron vent on the lower ground floor front elevation of no. 1, and omission of replacement dormer window."*
- 3.17 On 2 April 2019, planning permission was granted (ref. 2018/5140/P) for the *"Installation of two external boiler flues to the southern side elevation of no. 1A and plant enclosure in the rear garden all in association with the existing office buildings."*
- 3.18 On 5 May 2018, planning permission and listed building consent was granted (refs. 2017/4112/P & 2017/4727/L) for *"External and internal works including- replacement of ground and first floor windows on rear elevation of 1A; installation of replacement dormer window within the valley roofslope of 1A; installation of new stair within front lightwell to 1A; installation of flue and duct piping and associated 2.4m high timber screen and landscaping of the rear garden to the rear*

*of no. 1 Montague Street; installation of railings to rear boundary wall of 1A; external lighting on rear and side ground floor elevations; cycle storage area within front vaults at 1 and 1A Montague Street. “*

- 3.19 On 6 September 2016, planning permission was granted (ref. 2016/3665/P) for the *“Replacement of railing and installation of decking on the terrace at 1<sup>st</sup> floor level.”*
- 3.20 On 8 August 2012, an application for a certificate of lawfulness was granted (ref. 2012/3144/P) for *“Use of the premises of office (class B1) purposes.”*
- 3.21 On 29 September 2010, an application for a certificate of lawfulness was withdrawn (ref. 2010/4973/P) for *“Use of the premises for office (class B1) purposes.”*

# 4.0 DEVELOPMENT PROPOSALS

- 4.1 As set out in **Section 2** of this Statement, the Application seeks planning permission for the change of use of the existing listed building to higher educational use. There are no physical alterations proposed to the fabric of the Building as part of this application.

## Higher Educational Use by the AA

- 4.2 The Proposed Development seeks the change of use of 1359.7 sqm (GIA) of floorspace from office to higher educational use.
- 4.3 The proposed change of use will be temporary in so far as it will relate to the specific occupation of the Building by the AA, and therefore will be a time-limited permission. This would be secured through a reversionary condition, with the suggested wording as follows:

*"The use hereby permitted shall be carried on only by the Architectural Association Inc. and shall be for a limited period of 10 years from and including the date of this permission. At the end of this period the premises shall revert to their former lawful use which is as Class E office use, unless otherwise agreed in writing with the Local Planning Authority."*

- 4.4 The leasing of this Building is an important part of the School's expansion in the Borough, having occupied their current premises in Bedford Square for 100 years, contributing to the rich and diverse cultural identity in this part of Bloomsbury.
- 4.5 The Building lends itself to the type of studio based teaching that will be undertaken. This is a core part of how the School operates and is essential to architectural training. The AA intend to occupy the Building in a hybrid manner, providing office spaces for staff and teaching and learning spaces for student.
- 4.6 At the heart of its academic provision is studio-based instruction which is organised twice weekly along with a sequence of seminars, lectures, and workshops which are organised around the studios. The academic timetable is included below showing the type of instruction and programme of education that will be accommodated in term one.

## TERM ONE

MONDAY		TUESDAY	WEDNESDAY		THURSDAY	FRIDAY
First Year Studio Day	Conversations on Venice/ A World Where Many Worlds Fit: 1pm	Second and Third Year Unit Day	First Year Studio Day	Second Year CMS	First Year ETS	First Year Studio Day Second and Third Year Unit Day Symposia
First Year Studio Day					Second and Third Year HTS	
					Third Year PP Fifth Year APP	
					New Models	

AM Session

PM Session

Evening

**Figure 1.** Indicative timetable for the use of nos. 1 and 1a Montague Street during term 1 of 2022. Source: Architectural Association Inc.

- 4.7 Due to advances in technology and changes in pedagogy, whilst architecture students still learn to draw and model, a great deal of their work in 2021 is represented digitally. Rather than rooms full of drafting tables, contemporary studios are largely meeting spaces of various sizes where work is reviewed on-screen.
- 4.8 This approach to teaching is well suited to the layout of the Building at numbers 1 and 1a. More traditional aspects such as model building will largely remain in Bedford Square premises where the wood, metal and digital prototyping workshops are located. The use of 1 and 1a Montague Street is therefore wholly necessary to the teaching approach taken by the AA.

#### *Occupant Constituencies*

- 4.9 The AA School includes about 1,000 students and employs 340 staff (largely part-time academic and full-time administrative) in total. The addition of 1 and 1A Montague Street would represent an expansion of some 15% in terms of its available space. Thus, proportionately, on any given day, about 150 students (majority postgraduate) and 50 staff would be distributed across the two properties.
- 4.10 A typical scenario of this staff and student distribution might be:
- 1 Montague Street: 75 students, 12 tutors, 10 admin staff, 3 security/cleaning staff
  - 1A Montague Street: 75 students, 12 tutors, 10 admin staff, 3 security/cleaning staff
- 4.11 The AA plans to occupy the Building to provide a mix of administrative offices, senior academic offices, studios, seminar rooms and archives distributed across the two Buildings. The balance of dedicated teaching space will form approximately 65% of the total area.
- 4.12 The Buildings will be open to staff and students 24 hours a day, Monday to Saturday, with out of core teaching hours access controlled by security passes and on-site security staff. The majority of trips to and from the Building are expected to be between the normal and core teaching hours of 9.30am to 5.30pm Monday to Friday.
- 4.13 This is reflective of a modern 24h officer operation that could currently occupy the Building.

#### **Design**

- 4.14 At this juncture, the Applicant does not wish to make any physical changes to the Building to facilitate this change of use.
- 4.15 All features which make the Building suitable for flexible employment use in the future will be retained.

#### **Parking, Access and Storage**

- 4.16 The Proposed Development is 'car free' and would not provide any on-site car parking.
- 4.17 There will be no changes to the existing access and servicing arrangements. The sole and main access will be via the front door on Montague Street. There is no rear access. Servicing of the property would be from Montague Street.
- 4.18 The vast majority of students and staff use public transport or bicycle to the AA School. The AA does not have a formal Travel Plan as yet and would like to invite a condition to provide this after three months of occupation so they can more accurately set out the details and proposed ways of travel for the occupants.

# 5.0 PLANNING POLICY FRAMEWORK

- 5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.

## National Guidance

- 5.2 The revised National Planning Policy Framework (the “NPPF”) was published on 20 July 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government’s approach to planning matters and is a material consideration in the determination of planning applications.
- 5.3 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

*“For decision taking this means:*

*...*

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 5.4 In March 2014, the Government published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications.

## Statutory Framework

- 5.5 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.
- 5.6 The Statutory Development Plan for the Site comprises the:

- London Plan (2021) (the “London Plan”); and
- London Borough of Camden Local Plan (2017) (the “Local Plan”).

## Emerging LB Camden Policy

- 5.7 The current Local Plan was adopted on 3 July 2017 and forms the basis of the strategic and development management policies shaping planning decisions. Throughout 2018 and 2019, LBC updated its suite of Camden Planning Guidance documents to support the Local Plan.
- 5.8 The Local Development Scheme (February 2020) sets out that a review of the Local Plan is likely to commence in late 2020 early 2021 which has now passed. There is no further update available online. LBC is also focusing on updating its 2013 Site Allocations Local Plan with consultation taking place between February and March 2020 and adoption anticipated in Winter 2021, again there is no further update on this.

## Regional Guidance

- 5.9 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this application. Of relevance are:
- SPG: Social Infrastructure (May 2015);
  - SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
  - SPG: Planning for Equality and Diversity in London (October 2007).
- 5.10 LBC has a number of adopted guidance documents which are material considerations in respect of the Application including:
- Access for All CPG (March 2019);
  - Community Uses, Leisure and Pubs (January 2021); and
  - Employment Sites and Business Premises (January 2021).
- 5.11 In addition to the above, the *Bloomsbury Conservation Area Appraisal and Management Strategy* (April 2011) is a material consideration in the determination of this Application.

## 6.0 PLANNING POLICY ASSESSMENT

- 6.1 Within this section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 5**.

### **Loss of Office Floorspace**

- 6.2 The lawful use of the Building is office use which falls under Class E of the Use Classes Order Amendment 2020 (B1a under the previous version of the UCO). There are no restrictive conditions on the use of the Building, thus is it capable of being lawfully occupied by any of the town centre uses allowed for under Class E and not just as office space. The Proposals, which seek to convert the Building from office to higher educational use, has had regard to the relevant policies within the Camden Local Plan and the Employment Sites and Business Premises SPD (January 2021).
- 6.3 Local Plan Policy E2 (Employment premises and sites) states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.
- 6.4 The policy notes that Camden will resist development of business premises for non-business use unless it is demonstrated that:
- a. *“the site or building is no longer suitable for its existing business use; and*
  - b. *that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative types and size of business use has been fully explored over an appropriate period of time.”*
- 6.5 The Building is unable to meet part a of the criteria as it is in a reasonable condition where an office use could continue. The marketing that has taken place for the Building is discussed below.
- 6.6 The Employment Sites and Business Premises document provides further guidance on assessing proposals that involve a loss of a business use and the factors it will take into account.

### Marketing

- 6.7 Paragraph 5.39 in relation to the above policy states that the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use, through submitting *“evidence of a thorough marketing exercise, sustained over at least two years.”* The Site should be marketed at realistic prices, include a consideration of alternative business uses, layouts and marketing strategies.
- 6.8 The information submitted with this Application and prepared by office letting agents at Montagu Evans demonstrates the extensive marketing exercise that has been carried out over the last three years to let the Building for Class E office use. The lack of interest and viable offers on the Buildings has been put down to the type and nature of the accommodation which is not Category A and cannot provide inclusive access due to its listed status and restrictions on the adaptation of the interiors.
- 6.9 In particular, feedback from the marketing exercise and viewings has suggested that the larger rooms, which are located in the lower portions of the property and are unable to be subdivided due to the building's listed status, are too large. Conversely, the rooms towards the top of the building are too small and not easily accessible due to the lack of lift facilities. The accommodation does not provide consistent and open plan rooms that most occupiers are currently looking for.
- 6.10 Further, the trends post covid show that occupiers are seeking to occupy buildings that meet new certifications which are rapidly growing in significance in the office market. This includes a certification called WELL, a leading tool for certifying health and well-being standards in buildings globally. The existing buildings are unable to be adapted to meet WELL standards and do not have an EPC rating which are increasingly challenging for occupiers who have net zero targets.

### Alternative Uses

- 6.11 NPPF Paragraph 121 sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:

*“Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.”*

- 6.12 In past years, planning permission has been granted for the change of use of several properties along Montague Street, forming a number of hotels and premises on the east side, in addition to conversions back to the properties original residential use on both sides, which has set the precedent of alternative non-office uses along Montague Street.
- 6.13 Additionally, it is noted that the Building could be used for any of the uses contained within Class E without the need for permission following changes to the Use Classes Order in September 2020, and thus the office use of the Building could technically cease at any time.

### **Principle of Higher Educational Use**

- 6.14 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, local plan policy is extremely clear that higher education and is an important land use in Camden, which provides for a *“quarter of the publicly funded higher education institutions in London.”*
- 6.15 Paragraph 3.238 states that *“the provision of higher education and research makes a major contribution to Camden’s economy and is part Camden’s wider Central London role as a focus of employment, shopping, culture and entertainment.”*
- 6.16 Local Plan Policy C2 (Community Facilities) sets out that the Council seeks to *“support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.”* In assessing proposals for higher educational use, the Council will also balance the potential impacts on residential amenity and transport infrastructure.
- 6.17 The surrounding area comprises a wide range of uses, including existing non-residential institutions, which sit alongside other commercial and residential uses in the area.
- 6.18 The AA have an established reputation as an important institution in the area of Bloomsbury having occupied a terrace of Grade I listed buildings in Bedford Square for more than a century. They have been proud custodians of those Buildings, ensuring their maintenance and upkeep as part of their occupation and continued contribution to the Borough and Conservation Area.
- 6.19 The AA School of Architecture has identified an urgent requirement for new teaching space in an easily accessible location near to their existing headquarters building in Bedford Square. The internal layout of the Building satisfies the unique requirements of the AA in its providing a range of spaces suitable for the type of teaching and interactions with students that the AA prides itself on. The Buildings provide a range of small and medium sized rooms for a combination of small seminar classes, one to one tutorials and studio lessons with small classes.
- 6.20 The model that the AA operates means that the Building will be used for pure teaching space across 65% of the floorspace, and 35% for administrative or office support functions.
- 6.21 Furthermore, the time limited nature of this proposed change of use means that the use of the Building will revert back to office use after a period of ten years.
- 6.22 The Architectural Association wish to occupy the Buildings for a period of ten years as part of their current plans for the expansion and growth of the School and have identified this Building as suitable for their needs on a medium term basis.

### Benefits

- 6.23 The AA is a significant employer in the Borough and is an established institution experienced in occupying sensitive listed buildings within the Bloomsbury Conservation Area. Please see **Appendix 1** for details of the AA's history and reputation.
- 6.24 The influence of the AA in the Borough is illustrated by its legacy. Distinguished alumni and graduates of the AA have a long, rich history and connection with some of the most notable buildings and developments in the Camden Borough area. In the 1960's and 70's what is widely considered as a 'dream team' of AA graduates were employed by Camden Council's Architecture Department to produce a series of radically experimental public housing schemes, notably Dunboyne Estate and Alexandra Road Estate (Neave Brown), Maiden Lane Estate and Mansfield Road Housing (Gordon Benson and Alan Forsyth), and the Brunswick Centre (Patrick Hodgkinson).
- 6.25 The AA's relationship with, and contribution to, the locale and the Borough is reinforced by many local practices set up by AA alumni, namely Cullinan Studio (Baldwin Terrace, Islington), vanHeyningenHaward (Harmood Street), Fletcher Priest Architects (Middlesex House), Ron Arad Associates (Chalk Farm) and Alison Brooks Architects (Highgate Studios), and many others.
- 6.26 Occupying this type of historic building is familiar to the AA and is important to them to maintain the consistent character between the buildings they occupy across the Bedford Estate. It is very much part of their identity and is part of that established reputation and identity which attracts students and staff to work with the AA. The AA is pleased to occupy these buildings to help secure a sustainable use for the heritage assets and offers a viable alternative given the lack of interest to occupy the building.
- 6.27 The occupation of the building by the AA will secure the employment of c. 50 staff across the Buildings on a weekly basis, bring c. 150 students to the Buildings also. This type of activity, which is entirely in accordance with the character and the established functions in the Conservation Area, will consolidate this character and the rich mix of cultural institutions in this location.
- 6.28 The AA will fully occupy the Building thus preserving the maintenance and upkeep of the Building through the course of their tenure. The AA has an identify with occupying listed buildings, and therefore this change of use would also provide consistency across their estate.
- 6.29 It is our assessment that the AA's occupation of the Building, their proven track record in caretaking and upkeep of listed buildings demonstrated elsewhere in the Borough, the provision of employment for staff in the Borough and the lack of interest in the Building over the course of the last two years for an office use, make the change of use to a predominantly educational use an appropriate one.
- 6.30 The potential of use reversion at the end of the lease provides for the protection of the office (Class E) use over a longer period of time, and would allow the AA to occupy this building which meets their particular needs.

### Needs Case

- 6.31 Furthermore, it is of the upmost importance that the AA occupies this particular building for the following reasons:
- to enable the AA to meet their demand, having expanded the number of full time students over the last year (1,004 students on-boarded in 2021 from 901 in 2020);
  - to enable the AA to continue to expand their intake and meet the requirements of the increasing student numbers;
  - to fulfil the student's expectations in terms of the quality of the teaching space. The Building enables a range of teaching styles such as collaborative working in the larger rooms, one to one teaching in the individual lecturer rooms and smaller archive rooms, maintaining the architectural ambience of the AA;
  - to fulfil the student's expectation in terms of its proximity to the rest of the AA's estate, achieving that 'campus feel' which is important for the student's experience;
  - the quality of the Building and its listing contributes to the student experience, and the garden to the rear provides invaluable outside space;

- to prevent admin and other support staff from working from home, which caused a major disconnect with the students and professional staff during the pandemic; and
- to ultimately sustain the long vitality of the AA school of Architecture and its outstanding reputation.

### **Heritage Considerations**

- 6.32 The Building is Grade II listed and forms a group listing alongside the other properties along Montague Street. The Site is also located within the Bloomsbury Conservation Area and owing to its Central London location, is within close proximity to a number of other listed buildings.
- 6.33 London Plan Policy HC1 (Heritage conservation and growth) states that development affecting heritage assets and their setting should conserve their significance and appreciation within their surroundings.
- 6.34 Local Plan Policy D2 (Heritage) outlines that the Council will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 6.35 The proposed use is considered to be entirely compatible with the character of the Bloomsbury Conservation Area, which contains a mix of uses including a range of non-residential institutions. No internal or external alterations to the Building are proposed, therefore preserving the significance of the heritage asset, its setting and contribution to the character and appearance of the Conservation Area.
- 6.36 With the Building currently being vacant, the proposals will bring the Building back into a beneficial alternative use in accordance with paragraph 121 of the NPPF, which would result in significant intuitive heritage benefits, safeguarding its future.

### **Transport**

- 6.37 Chapter 10 of the London Plan provides the regional guidance for transport. Policy T1 (Strategic approach to transport) aims 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.”
- 6.38 Policy T2 (Healthy streets) aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 6.39 At the local level, Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.40 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.41 Whilst the AA does not have a Travel Plan for this Building it intends to prepare one once they have taken full occupation of the building and are able to monitor and analyse movements to and from the building. The AA welcome a travel plan as a condition of any forthcoming grant of consent and could commit to preparing the required information within three months of occupation once the typical patterns of use are understood.

### **Sustainability**

- 6.42 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The Proposed Development is a ‘minor’ scheme involving the change of use of office to higher educational use.

- 6.43 At the local level, Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change through encouraging sensitive energy efficiency improvements to existing buildings.
- 6.44 Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.
- 6.45 The AA is aware of the above policies, however the Building envelope will not be updated due to the historic sensitivities of the listed building.
- 6.46 The AA has their own environmental policy which states that they are committed to reducing their carbon emissions through effective energy management throughout their buildings and strive to continually improve the environmental performance across all of their educational and business activities. Further details of the policy are set out below, the AA seeks to:
- *“Fully comply with all relevant legal requirements and guidelines in order to achieve good environmental practices and operate in a sustainable manner.*
  - *Reduce our carbon emissions through minimising energy and water usage in our buildings, vehicles and activities in order to conserve supplies, particularly where they are non-renewable.*
  - *Use low energy lightbulbs where possible and switch off lights on bright days and when not in use.*
  - *Save energy during cold weather by keeping windows and external doors closed to avoid heat loss and draught.*
  - *Minimise water usage for all of our activities and repair all leaks.*
  - *Minimise waste through a commitment to reuse or recycle, where possible.*
  - *Operate and maintain company vehicles (where possible) taking into account environmental issues as far as reasonably practical.*
  - *Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.*
  - *As far as possible to integrate environmental and ethical consideration when sourcing suppliers, products and services that have negligible environmental impact and encourage others to do the same.*
  - *Assess the environmental impact of any new processes or products we intend to introduce in advance.”*
- 6.47 The commitments outlined in the Policy represent the importance given by the AA to managing environmental sustainability and are to be reviewed on an annual basis and updated when necessary.
- 6.48 This policy statement is prominently displayed at all AA school premises and made available to all interested parties upon request. The AA will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

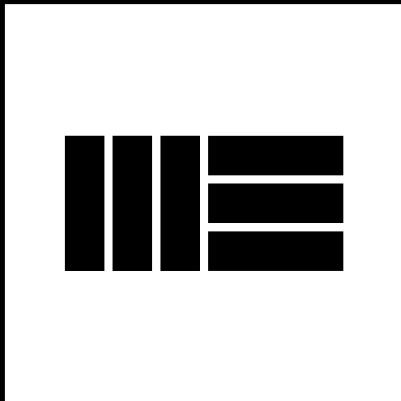
### **Waste and Recycling**

- 6.49 Camden Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.50 Waste storage and recycling bins will be provided in large compartmented storage units in the kitchen spaces. Refuse will be periodically taken out by the facilities staff from the kitchen spaces to the kerbside on the relevant collection date.

# 7.0 CONCLUSIONS

- 7.1 The Proposed Development to which this Statement relates, seeks the conversion of Nos 1 & 1A Montague Street as part of its change of use to provide higher educational space in association with the AA School of Architecture.
- 7.2 The Proposals involve the change of use of 1359.7 sqm (GIA) of floorspace.
- 7.3 The Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.4 The Proposals have been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.5 Having regard to the assessment undertaken within this Statement, we consider the benefits arising from these Proposals can be summarised as follows:
- The occupation and upkeep of two Grade II listed buildings by an institution that has an established reputation in the Borough and that makes a significant contribution to the cultural identity of this part of Camden;
  - The provision of employment opportunities for c. 50 staff and support staff who would benefit from the conversion of the property; and
  - The consolidation and growth of an important institution with deep connections to the Bloomsbury Conservation Area having occupied Grade I listed buildings in Bedford Square for more than 100 years.
- 7.6 The marketing exercises undertaken in the last two years to let the Building for office use demonstrate the lack of interest in the Building and the redundancy of the building for office use.
- 7.7 The Council's position on the loss of small office space within CAZ is recognised thus this Application is made for the temporary change of use to an educational establishment. This would be secured through a reversionary condition.
- 7.8 Given that there is no long-term impact upon the office supply within CAZ and the benefits of safeguarding the future of this heritage asset we respectfully request that LBC grants planning permission for the proposed temporary change of use.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL