

20 April 2022

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BDP.

Dear Josh,

UNIVERSITY OF LONDON, DILKE HOUSE, 1 MALET STREET – PLANNING APPLICATION REFERENCE 2021/5145/P

BDP on behalf of the University of London (UoL) is submitting a revised set of planning drawings and write in response to your email dated 8th February 2022 in relation to application ref. 2021/5145/P for the proposed change of use at Dilke House, 1 Malet Street, London WC1E 7JN.

In the email correspondence received from LB Camden, it is stated that the application is required to be supported by additional evidence in accordance with Camden Local Plan 2017 policy E2 (Employment Premises and Sites) and the Camden Planning Guidance on Employment Sites and Business Premises (2021). This letter sets out our response and proposes next steps to take application ref. 2021/5145/P forwards, including the reduction of the amount of office space (Use Class E) proposed to be changed to dual use (Use classes E and F.1) and an overview of the marketing activities undertaken, the suitability of the building for continued office use, and the wider benefits of bringing the education provider Glion Institute of Higher Education (Glion) to the borough.

As per the revised proposals, the majority of Dilke House would be retained for office use, given the floorspace proposed to change to dual office and educational use has been reduced by a significant amount from 1,180sqm to 548sqm. Therefore, the loss of office space has been minimised and the associated impacts to Camden's wider stock of office floorspace are minimised as much as feasibly possible. This letter sets out how Glion's proposed use of the building would accord with a number of Camden's policy objectives relating to business uses and education, as they will continue to use the property for office uses supplemented with educational uses, and operate as a business, thus bringing very similar benefits to Camden to those provided by an office building. In particular, the revised proposals will deliver significant benefits including Glion's positive contribution to the Knowledge Quarter, Central Activities Zone (CAZ) and to employment and the local economy in Camden.

In addition, there are exceptional circumstances that have prevented Dilke House from being marketed as office space and justify the minor loss of office space. This includes the Covid-19 pandemic and advice received from a reputable property agent confirming the unsuitability of the building for office use, both of which led to a decision not to extensively market Dilke House. These significant benefits and exceptional circumstances outweigh any non-compliance with Policy E2 (Employment Premises and Sites) and justify the loss of office space, which comprises a very small area of floorspace that has been reduced through the revised proposals. Overall, the objectives of Policy E2 and other policies are fulfilled through the proposed development.

1. Background

On 23rd November 2021, an application (ref: 2021/5145/P) was submitted on behalf of the UoL to LB Camden for a change of use of Dilke House, in response to the urgent need for Glion to combine their office and teaching functions in one consolidated building in an advantageous location. It applied for the following description of development:

“Change of use from Class E to mixed use F1 Learning and non-residential institutions and Office E(g)(i).”

The proposed development would allow the consolidation of Glion’s existing sites into one, bringing benefits to their business and their students by bringing both sides of their business into one area within close proximity of other Higher Education Institutions in the Bloomsbury Knowledge Quarter. In particular, Camden is considered to be the ideal location for Glion to provide their taught programs and enrolment and marketing hub due to the abundance of Hospitality and Luxury businesses concentrated in Camden and in close proximity to and within the Knowledge Quarter. As set out in the supporting letter from Glion dated 8th April 2022 at Appendix A, Glion has numerous industry partnerships including the Four Seasons, Hilton, Marriott, Dior and Richemont, of which many are located in London and are based in the London Borough of Camden. As such, Glion’s move to Camden as a Higher Education provider and employer would complement existing surrounding land uses, services and facilities. The change of use would therefore bring significant benefits for Glion’s students and staff, and enable Glion to move their unique business to Camden, allowing significant enhancements in how they operate as a business and bringing benefits to Camden’s local economy.

Glion is seeking to educate and provide the necessary skills and connections to students in hopes to propel their career and allow them the opportunity to be best in class, and the proposed development is required to enable this. The change of use to dual use is required to deliver high quality office and educational facilities that directly support London’s leading role as a centre of higher and further education of national and international importance.

An email was received from Josh Lawlor on 5th January 2022 in relation to the originally submitted details, requesting further information about the most recent uses of the property, and details of when the property was vacated. This was subsequently provided in a letter from BDP Planning dated 21st January 2022, which confirmed that until the end of July 2020, the property was occupied by a combination of tenants from the UoL’s Member Institutions and third-party commercial office tenants. The letter also noted the building has been used by tenants both as offices and for university and education purposes as a result of its location within the Bloomsbury Campus area, which make Dilke House the ideal location to consolidate Glion’s office and educational facilities.

In response, on 8th February 2022, email correspondence was received from Josh Lawlor stating the requirement for the application to be supported by further evidence, demonstrating compliance with Camden Local Plan 2017 policy E2 (Employment Premises and Sites) and the Camden Planning Guidance on Employment Sites and Business Premises (2021).

2. Proposed Revisions

In response to the comments received from LB Camden on 8th February 2022, we would like to revise application ref. 2021/5145/P to reduce the amount of dual office and educational floorspace proposed. This approach was presented and discussed in a telephone conversation between LB Camden and BDP Planning on 16th February 2022.

At present, the proposal as submitted on 23rd November 2021 comprises a change of use of all existing floorspace across all floors of the building including the basement, ground, and first-fifth floors, from office (Use Class E) to a dual use as office and/or learning and non-residential institutions (Use Class F.1). It is proposed to revise the application to provide the dual use only on the part-ground, part-first, and second and third floors of Dilke House, with full office use on the lower ground, part-ground, part-first, fourth and fifth floors of the building. Table 1 sets out how floorspace would be distributed between office and dual office and/or learning and non-residential institution uses in line with the proposed revisions.

Table 1 – Revised office (Use Class E) and dual office and education (Use Class F.1) floorspace figures

Building Floor	Office use floorspace (sqm GIA)	Dual office and/or learning and non-residential institution use floorspace (sqm GIA)
Lower Ground	165	n/a
Ground	65	118
First	68	97
Second	n/a	163
Third	n/a	170
Fourth	180	n/a
Fifth	154	n/a
Total	632	548

As originally proposed, this would amount to all 1,180sqm of the building being converted to dual use. The revised proposal would result in a significantly reduced amount of floorspace being converted to dual use, with 548sqm proposed to be dual office and educational use. As such, the amount of office floorspace proposed to be lost has been minimised as much as possible, which accords with the aim of Policy E2 to protect Class E office uses.

Please find enclosed a set of revised drawings, updated to show the reduced amount of floorspace proposed as dual use. Please see Appendix B for a schedule with updated drawing revisions for previously submitted drawings that are to be superseded with revised drawings.

3. Policy E2 – Office Space

Policy E2 (Employment Premises and Sites) of the Camden Local Plan supports delivery of employment generating uses which benefits the local economy:

“The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.”

As set out in a letter from BDP Planning to Josh Lawlor dated 21st January 2022, Glion have expressed an interest in occupying Dilke House, with the intention of using the building primarily for office space with the remaining areas used for teaching. The enclosed letter from Glion dated 8th April 2022 sets out how they propose to use all floors of Dilke House, with office use concentrated on the lower ground to first, fourth and fifth floors and dual office and learning space provided on the ground to third floors.

Glion's move to Camden will bring a new and unique combined office and hospitality Higher Education offer to Camden. This supports the CAZ by strengthening the specialist academic and educational cluster covering the UoL campus and supporting one of the strategic functions of the CAZ to provide centres of excellence for Higher Education. Higher Education is a major contributor to the economy in Camden and London, both directly and through its influence on other activities (e.g. attracting international businesses and generating new start-up firms). Camden's universities are a key component of the Camden's Knowledge Quarter, and are a major factor in the growth of the science and creative sectors. As a specialist university providing courses that are not currently delivered in the UoL educational cluster such as BBA International Hospitality Business, MSc International

Hospitality Business and MSc Real Estate, Finance and Hotel Development, Glion will contribute positively to the CAZ and Knowledge Quarter, and bring economic benefits to Camden.

Through bringing their exceptional teaching and business operations to the borough, Glion will further support the local economy by paying business rates to Camden, and providing employment for 50 individuals within Dilke House. As set out in the supporting letter from Glion at Appendix A, it is anticipated this will include a number of Camden residents to fill both administrative and Faculty roles. Glion intend to use the office space primarily for Sommet Education UK Ltd, one of Glion's affiliates, to provide student support services including enrolment and marketing support, as well as for office space to provide student support functions specific to Glion. The minimal amount of education space is proposed to be used as classrooms for Undergraduate and Postgraduate students. As per the revised proposals, the majority of the property is to be used as Class E office space and will therefore provide continued employment premises for business uses, as well as educational uses that support both the functions of the CAZ and the local economy. It is therefore considered that the proposal would support the functioning of the local economy and deliver employment generating uses in accordance with Policy E2.

Policy E2 also states the Council will resist development involving a loss of office space unless it can be demonstrated to the Council's satisfaction:

- a. *"the site or building is no longer suitable for its existing business use."*

Following the vacation of tenants from Dilke House in July 2020, the applicant was advised by property agent Knight Frank that new tenants could not be found if the building was left in its existing poor condition. As such, the building was deemed unsuitable to let for office use due to a faulty lift and heating system, and no longer suitable for office use. The advice received from Knight Frank on 6th September 2020 stated:

"Bearing in mind the current condition of the premises and the emerging market conditions, we don't believe that doing nothing is an option – the building has to have a reliable operating lift and boiler to feed the heating system – by not having these two items, the space will effectively become unlettable in the market especially when considering the competition that is on the market and likely to come onto the market in the coming months. Even at a heavy discount, we do not believe that any occupier with the other options in the market would be prepared to sign a lease on the floors without a functioning building so as to look after their staff."

Consequently, internal refurbishment works have been undertaken to ensure that the building is more attractive to potential tenants. The applicant tendered for letting agency services in 2021 and each tendering agent suggested that Higher Education tenants would be significantly more attracted to the property than commercial tenants as a result of the site's location within the Bloomsbury Campus and Knowledge Quarter, indicating the suitability of the building for educational use rather than office use.

- b. *"that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time."*

The supporting Camden Planning Guidance on Employment Sites and Business Premises (2021) requires submission of marketing material to Camden to demonstrate compliance with point (b) of Policy E2, and Camden planning policy notes that an appropriate marketing period is two years. In tandem with the unsuitability of the building following vacation of the property, the coronavirus pandemic has had considerable adverse impacts upon the office market that have significantly limited UoL's ability to market Dilke House for office use. For example, the pandemic has created significant uncertainties and difficult letting marketing conditions for offices that have strongly influenced the decision not to market the property since it was vacated in 2020.

These special circumstances should be taken into consideration for Dilke House given the associated difficulties in marketing the property for office use and the clear benefits to Glion moving to Camden to provide exceptional Higher Education facilities in the Knowledge Quarter and UoL educational cluster in the CAZ. Together, these factors go some way in this instance to justify an exception to the normal approach of requiring further marketing evidence.

In addition, while it is not possible to provide all of the marketing information set out under Policy E2, the loss of office space would be minimal due to the dual use being confined to limited floors of the building as set out in section 2 of this letter. In addition, the long-term office use of Dilke House will be protected given the dual use

would last for a period of ten years, resulting in minimal long-term impact to the stock of office floorspace in Camden. As such, the overall impact of the loss of office floorspace is limited and Policy E2 is adhered to.

As set out in the letter dated 21st January 2022, the proposal would deliver on a number of other significant planning policies. In particular, policy E1 (Economic Development) specifically states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. To do this the Council will support a number of measures, including:

“d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;

e. 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 this Local Plan.”

As revised, the proposal accords with Policy E1 by providing dual office and educational uses that help build the educational function of the Knowledge Quarter. In particular, Glion’s occupation of the building will contribute to delivery of specialist hospitality educational services that are not currently provided in the Knowledge Quarter, or Camden more widely, to a large extent. A large number of staff will continue to be employed at the building in managerial, administrative and back of house roles, as well as teaching roles with an anticipated 50 employed roles to be provided in Dilke House, as set out in the Statement at Appendix A.

Furthermore, Policy C2 (Community Facilities) supports the development of educational development, stating that the Council will work with its partners to ensure that community facilities and services are developed and will further support the investment plans of educational, bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. The change of use allows Glion to expand and consolidate their educational operations comprising a community service, which would contribute to delivery of a number of local socio-economic benefits as set out above, in accordance with C2.

Therefore, the proposal as revised would accord with Camden Local Plan Policies E2, E1 and C2 by delivering significant employment and economic benefits for Camden, supporting the wider Bloomsbury Knowledge Quarter and CAZ, and providing educational floorspace that delivers community facilities and services. Overall, these benefits would outweigh any negligible impacts from the loss of 548sqm of office floorspace.

4. Proposed planning condition

To provide further comfort in relation to securing the long term office use of Dilke House, we would suggest that a planning condition is applied to the decision notice for application ref. 2021/5145/P. The proposed condition ties the permission to the occupation of Dilke House by Glion, to ensure the property reverts to full office use when Glion vacate the property. The suggested condition wording is as follows:

“The 548sqm of dual office (Use Class E) and educational (Use Class F.1) use on the part-ground, part-first, and second and third floors of the property shall revert to office use (Use Class E) only, following vacation of the property by Glion Institute of Higher Education.”

Inclusion of this planning condition on the decision notice would effectively secure the office use of the site. This is because if Glion were to leave Dilke House, the property would revert to full office use. Therefore, the proposed condition ensures the long-term office use of the property.

5. Conclusion

Taking all of the above into account, it is considered that the proposed development as revised would meet the objectives of Policy E2 (Employment Premises and Sites), given the proposal would secure the long-term office use of the property and Glion’s presence in Camden would bring multiple socio-economic benefits to the Borough. As set out above, there are exceptional circumstances that should be taken in to consideration that have prevented the marketing of Dilke House for office use, including the unsuitability of the building for office use and the

coronavirus pandemic. In addition, as revised, the proportion of office floorspace proposed to be lost temporarily during Glion's occupation of the building has been reduced by a significant amount, comprising a minimal amount of office space. This is unlikely to adversely affect Camden's stock of offices in comparison with the proposal as submitted on 23rd November 2021 for the change of use to the whole building. The proposed scheme would also deliver on a number of other important policy objectives relating to economic development and community facilities. Therefore, any impacts from the loss of office space have been minimised, and these impacts are outweighed by the significant benefits of the scheme that would bring Glion to Camden and meet other significant Camden Local Plan policies. As such, permission should be granted for the proposed change of use to 548sqm of Dilke House.

I trust that you have the requisite information to determine the application although please do not hesitate to contact me if you have any questions or would like to discuss the above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Rudd', with a long horizontal line extending from the end of the signature.

Tom Rudd
Associate - Planning and Urbanism

BDP.

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Appendix A: Glion Statement of Support

Josh Lawlor
Senior Planning Officer
London Borough of Camden
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WC1H 9JE

8 April 2022

Dear Mr Lawlor,

UOL DILKE HOUSE, 1 MALET STREET, WC1E 7JN – CHANGE OF USE APPLICATION REF. 2021/5145/P – STATEMENT OF SUPPORT

I write in support of the planning application (ref. 2021/5145/P) submitted by BDP on behalf of the University of London for a change of use of 548sqm of Dilke House from office (Use Class E) to dual office and/or learning and non-residential institutions (Use Class F.1).

1. Introduction and Background

Glion Institute of Higher Education is a private university with over 1600. students each year, originally founded in 1962. Glion are firmly established among the world's finest education institutions specialising in hospitality and luxury management, and Glion's mission is to develop professionals for global careers in the world's premier hospitality and luxury businesses.

We offer applied business education, combining academic rigor, hands-on practical skills and professional internships, all with a focus on developing the soft skills that are a prerequisite in the modern global economy.

At present, Glion is composed of one main flagship campus located in Glion, Switzerland and two other campuses in Bulle, Switzerland and London, United Kingdom. Glion established its first overseas campus in the UK in 2013 in Downshire House, which forms part of the University of Roehampton campus at Roehampton, situated in the London Borough of Wandsworth.

All Glion campuses offer student accommodation, classrooms and offices for all support functions, including Student Affairs, Internship and Careers and Student Registry Services and the focus of the London campus is classrooms for our Undergraduate students semesters 3 – 7 and Postgraduate students. In addition, one of Glion's affiliates, Sommet Education UK Ltd, currently operate from an office space at 17 Devonshire Square, London, England, EC2M 4SQ (the "City Offices"), which supports the different institutions of the Sommet Education group, including Glion, mainly by providing enrolment support and marketing services.

2. Glion's proposed use of Dilke House

In summer 2021, Glion approached University of London, investigating possible new office accommodation space to replace our existing City Offices. Following a site visit to Dilke House in July 2021, we raised the possibility of combining our two existing London sites into one, given the benefits to our business and students of bringing both sides of the business into one area within close proximity of other Higher Education Institutions in the Bloomsbury Knowledge Quarter.

As such, Glion's project would be to occupy all floors of Dilke House and to use the building in part for office space, and in part for teaching space, to replace and consolidate the existing facilities at Roehampton and the City Office.

The lower ground to first, fourth and fifth floors of the building would be used to support office space while the ground to third floors would be used to provide either office or teaching space.

Overall, the proposed change of use would allow for the following beneficial functions to take place and services provided.

- Enrolment and Marketing functions of Sommet Education
- Teaching and Student support for the London Campus Undergraduate and Postgraduate courses
- Student Support functions

3. The need for Glion in Camden

Glion is considering to locate office and teaching facilities in one consolidated UK campus space due to enabling the two functions to operate more closely and benefit from shared services, including Human Resources, Information Technology and student support.

Given the focus of our courses on Luxury and Hospitality Business, we consider Camden to be the ideal location to provide both our taught programs and enrolment and marketing hub due to the abundance of Hospitality and Luxury businesses concentrated in Camden. A number of these are located in close proximity to, or within, the Knowledge Quarter and as such, we consider Dilke House to be an ideal location for Glion.

Dilke House would provide a dedicated facility bringing together our 2 existing entities currently located at the extremes of South West London and Liverpool Street. The travelling time between them is a constant burden to the teams. In addition to the benefits of the Glion London campus being based in Camden with its close proximity to a broad range of educational institutions and the close proximity to the Hospitality Industry.

4. Benefits of Glion in Camden

Strengthened Knowledge Quarter

It is considered that Glion's proposed location in Camden would contribute to the existing Bloomsbury Knowledge Quarter which is formed of other universities and educational institutions including UCL, UAL, SOAS and Birkbeck. This is due to Glion providing 300 student spaces to be accommodated by facilities in Dilke House, with 3 different degrees on offer including one undergraduate and two postgraduate courses. This includes courses such as:

- BBA International Hospitality Business – semester 3 – 7
- MSc International Hospitality Business
- MSc Real Estate, Finance and Hotel Development

Wider Economic Benefits

Given the proposed use of part of the building for office space, the project contemplates for a large number of staff to continue to be employed at Dilke House in managerial, administrative and back of house roles (as would be expected from an office building), rather than solely teaching roles. In total, Glion would employ 50 individuals to work in the office and education space in the building, with the move from Liverpool Street and Downshire House there will be the need to recruit both administrative and Faculty from the local Camden Borough. It is considered that the students and employees brought into Camden by Glion would contribute positively to the local area and economy.

Further wider economic benefits would be gained from Glion in Camden, namely the positive prospects for Glion students following completion of their courses. 90% of students successfully graduate from Glion's courses and enter the workforce. Student destinations include:

- Leadership Roles within the Hospitality Industry
- Luxury Retail roles
- Hospitality Head Office roles in Marketing, Finance and Human Resources

Industry Partnerships

Glion has numerous industry partnerships including Four Seasons, Hilton, Marriott, Dior and Richemont. Many of these partners are located in London and some are based in the London Borough of Camden. As such, there would be clear business benefits to being located in a central London location in the centre of Camden. In turn, this would bring wider economic benefits to Camden by way of bringing more businesses into the area.

5. Conclusion

For the reasons mentioned above, we therefore kindly request that Camden Council accept the application ref. 2021/5145/P to provide enhanced office and educational facilities, which will have multiple benefits for Camden and the wider area.

Yours Sincerely,



Georgette Davey

Managing Director

Appendix B: List of Amended and New Drawings

Submitted Drawing No.	Revised Drawing No.
Proposed Lower Ground Floor GA Plan UOL-PEV-DH-B1-DR-A-1240 Rev. P02	Proposed Lower Ground Floor GA Plan UOL-PEV-DH-B1-DR-A-1240 Rev. P03
Proposed Ground Floor GA Plan UOL-PEV-DH-00-DR-A-1241 Rev. P02	Proposed Ground Floor GA Plan UOL-PEV-DH-00-DR-A-1241 Rev. P03
Proposed First Floor GA Plan UOL-PEV-DH-01-DR-A-1242 Rev. P02	Proposed First Floor GA Plan UOL-PEV-DH-01-DR-A-1242 Rev. P03
Proposed Second Floor GA Plan UOL-PEV-DH-02-DR-A-1243 Rev. P02	Proposed Second Floor GA Plan UOL-PEV-DH-02-DR-A-1243 Rev. P03
Proposed Third Floor GA Plan UOL-PEV-DH-03-DR-A-1244 Rev. P02	Proposed Third Floor GA Plan UOL-PEV-DH-03-DR-A-1244 Rev. P03
Proposed Fourth Floor GA Plan UOL-PEV-DH-04-DR-A-1245 Rev. P02	Proposed Fourth Floor GA Plan UOL-PEV-DH-04-DR-A-1245 Rev. P03
Proposed Fifth Floor GA Plan UOL-PEV-DH-05-DR-A-1246 Rev. P02	Proposed Fifth Floor GA Plan UOL-PEV-DH-05-DR-A-1246 Rev. P03