

Flat 3
Queen Alexandra Mansions
Grape Street
London WC2H 8DX

The head of the Planning Team
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

16 July 2023

Dear Sirs

Re: Composite Planning Applications (*Planning Applications*) in respect of proposals for the development of a series of plots bounded by High Holborn, Museum Street, New Oxford Street and West Central Street including Selkirk House, Museum Street (now reference 2023/2510/P, originally Labtech application 2021/ 2954/ P)

I refer to the Applications, as well as to previous correspondence and emails.

I deliberately use the word Applications in the plural, because this is in fact a series of separate applications in relation to plots whose only connection is their geographical proximity. Some of them lie within the Bloomsbury Conservation Area and some of these have recently been listed. The Applications have been grouped together in the hope that the serious damage caused by the principal proposal (a 74 metre skyscraper towering over the Bloomsbury Conservation Area, as part of a speculative development project now sponsored by a private equity fund) can be argued to be compensated by some of the other proposals.

I make this submission as a resident of Queen Alexandra Mansions, Grape Street. My building would apparently become part of the boundary of the proposed demolition and reconstruction site, with the rear wall possibly becoming a party wall. Just as importantly, local residents and businesses would be forced to endure the noise and vibration nuisance (as well as the dirt and dust pollution and traffic disruption) of the demolition and

construction period (which has, alarmingly, grown from 3 years (December 2020 zoom) to four years (as per the latest version of the project website).

According to the planning portal, the period of consultation expires on 27 July, despite the fact that the applicant has not yet submitted all the materials required. To confuse the position, public notices put up by Camden give the deadline as 24 July. This has not yet been corrected. I assume the date contained in the notice in Camden New Journal was the correct one.

Your colleague Mr Fowler has indicated he may accept representations up *until the date of determination*, although this implies that representations could be taken into account after officers have finalised their report on the Applications, which seems impracticable. Nor is it clear whether the portal will make clear that “late” representations will be accepted.

The Applications are complex and highly controversial and the documentation which has been submitted is extensive and complex, without necessarily being comprehensive or properly admitting, let alone addressing, the acknowledged risks inherent in the demolition and construction proposals, on the safety of which the Council will have a responsibility to take a view.

The Applications are substantially identical (at least in relation to the proposed 74 metre skyscraper) to the previous 2021 application, as amended. The Applicant has sought to use a device to circumvent and avoid dealing with the over 200 representations made on the 2021 application, by submitting a new application which is substantially identical (described by Simten as a continuation of the 2021 application and characterised by LCC in the following terms: *the proposals for the One Museum Street office building, High Holborn and the Vine Line building are unchanged from the previous application*).

Review of the materials submitted in support of the Applications requires considerable time. It is unfortunate that the applicant has chosen to submit the Applications, on which extensive discussions with the Council have been dragging on in an unhurried manner, during the holiday season.

This exercise is made all the more difficult by the facts that:

- On the admission of BC Partners’ representative and their predecessor Labtech, there has, quite deliberately, been no prior public consultation on behalf of the applicant on the proposals; and
- Both Labtech and BC Partners and their representatives have failed to address longstanding questions, going back at the least to a zoom conference call hosted by the Council in December 2020.

It is also unfortunate that, at this crucial moment, the model of the proposed development has seemingly been removed from the very limited public display which has been made

available. It took from January to March 2023 for Simten to place it on display. It had previously only been available for inspection on one day, 9 April 2022.

In the circumstances, I am therefore formally requesting the Council to exercise its discretion to extend the consultation period. I suggest that it should run until the end of September, at the earliest. This assumes missing documents are submitted without further delay.

It is also evident from the results of my Freedom of Information request that there remain multiple loose ends on important matters. Arguably the application is premature and, if processed now, will leave major issues, having a day to day impact on local residents during demolition and construction phases, to be resolved in an opaque manner between the developer and the Council.

The Council's officers have been closely involved in the formulation of the proposals included in the Applications. They may perhaps think they are already familiar with all the detail of the Applications, including the important environmental and heritage issues to which the Applications give rise. Nevertheless, the officers ought to require considerable time to study and challenge the materials submitted as part of the Applications in order to assess them dispassionately and objectively.

It is to be hoped that someone in the Council, who has not been involved in the day to day discussions with Labtech and BC Partners (and their proxies), will take a look at the Applications with fresh eyes and recognise the enormity (in both literal and figurative senses) of what is being proposed in and adjoining the Bloomsbury Conservation Area. There must also be a comprehensive process of internal consultation within the Council, notably on environmental, sustainability and heritage issues, taking account also of the results of recent consultations carried out by the Council on site allocations.

It should therefore follow that any extension of the consultation period will not in substance prolong the period required for the Council to give due consideration to these controversial proposals before a properly informed and balanced decision can be taken.

I should make clear that I consider the current deadline unreasonable. No one can be expected to digest the mass of details, and identify the lacunas, in the time currently granted. The propagandistic manner in which some of the material is presented does not assist an objective assessment. I therefore reserve the right to challenge it, if necessary.

I have separately made clear that I reserve the right also to challenge the Council's refusal to have regard to the multiple representations on the 2021 application, to the extent that in substance they are still relevant to the proposals in the "unchanged" Applications.

Please treat this as an objection to the Applications in their present form.

I look forward to hearing from you.

I am copying Mr Fowler and local Councillors.

This is an open letter.

Yours faithfully,

Peter Bloxham