

To: Camden Planning Dept

From: South Bloomsbury Tenants & Residents' Association

Date: 12th August, 2023

Dear Sir/Madam,

On behalf of the South Bloomsbury Tenants and Residents' Association, I am writing to formally object in the strongest possible terms to the applications for 1 Museum St and 166 High Holborn: 2023/2510/P and the LBC application for 10-12 Museum St., 35-41 New Oxford St and 16A-18 West Central St. 2023/2653/L, on the following grounds:

CONSULTATION

There has been no pre-application engagement with the local community as recommended in the National Planning Framework. The lack of public consultation at the formative stage also contravenes the 'Gunning Principles' which state that the proposer should give sufficient reasons for their proposals so they can be examined and responded to by the public and that 'the product of consultation is conscientiously taken into account when finalising a decision'.

The public has in this case repeatedly raised their concerns over a range of issues embodied in these proposals, initially via the West End Community Network in December 2019 and subsequently, to date, via the Save Museum Street (SMS) coalition of residents' organisations, including South Bloomsbury TRA, as well as by the 250 individuals and conservation bodies who formally submitted their objections to the previous application.

Yet the concerns which have been expressed to the developers on numerous communications, individually and as part of SMS over a period of 4 years have not been taken into account or responded to in any significant way, as evidenced by this new application.

The objections that we continue to raise are:

1. Harm to the Bloomsbury Conservation Area: the proposal does not comply with a number of conservation policies at national and local levels, such as the National Planning Policy Framework and local authority obligations to protect conservation areas under the Planning (Listed Buildings and Conservation Areas Act) 1990.

Bloomsbury was one of the first areas in the country to achieve conservation area protection and is internationally appreciated as an area that represents archetypal London, precisely because it has retained its particular Georgian character and scale. There is a village feel to the network of streets which have been laid out in the area south of the British Museum (the Earl of Southampton's original '7 ½ acres'). Later Victorian additions, such as the mansion blocks, were clearly designed to respect the scale and Classical stylistic elements of the earlier period.

Given that so much care has been taken over many generations to observe and enhance the character of the area, it is inconceivable that this could be undermined at a stroke by a cynical move on the part of an unscrupulous developer to create an enormous, speculative office

tower of incompatible design. There is no attempt to ‘converse’ with the existing architecture but to completely dominate the whole area, the traditional views and surroundings, for the sole motive of making profits.

The lowering of the tower by 6m is negligible in terms of the menacing, overbearing presence it will *still* have over the historic area and from key viewpoints. The additional bulk which the developers have added to ‘compensate’ themselves for losing several floors of office space, reinforces its already massive appearance.

The reality for people living and visiting the area will be the inescapable presence of a 74m high, bulky structure, on a main N/S route linking Bloomsbury with Covent Garden, looming up over the area, significantly intruding on views from iconic buildings such as the British Museum, Hawksmoor’s St George’s, Bloomsbury, and the historic open spaces such as Bedford Square.

It is very likely that should the application be granted, it will soon be followed by similar applications for possibly even taller buildings which will completely undermine and destroy this incredibly important and unique conservation area.

10-12 Museum St., 35-41 New Oxford St and 16A-18 West Central St. 2023/2653/L

These properties lie within the Bloomsbury Conservation Area and are almost entirely listed Gde II. The developer’s plans to acquire listed building consent in order to make alterations, including the removal of the early C19 horse stalls and ramp from the unlisted Nos 16a, b and 18 will undermine the integrity of the rest of the historic site and result in the loss of character, as well as rare historic evidence for appreciating how small-scale commercial establishments in central London operated and transported their merchandise.

2. Environment

Carbon emissions: the existing sound building will be unnecessarily demolished, adding 65,000 tonnes of CO² emissions when it could be retrofitted; this contravenes national, Greater London Authority and local policies, and is incompatible with Camden’s declared climate and ecological emergency of Nov 20

Michael Gove’s recent decision as Secretary of State for Levelling Up, Housing and Communities to reject the application by Marks and Spencers to demolish its flagship store on Oxford St has set an important precedent for local authorities to use their powers to encourage applicants to go back to the drawing board and earnestly consider viable, alternative solutions which are more environmentally friendly.

Simon Sturgis, an environmental specialist who has been advising on the carbon credentials of both Marks and Spencer’s development proposals and those of architects DSDHA and Simten Developers has recently stated that ‘This particular scheme for this site is way outside of that [net zero by 2050 goal] and... I think it’s even worse than anything that was proposed in Oxford Street... for Marks & Spencer.’

This would surely present a disturbing outcome for Camden if the proposal were granted. There are now many policies and target reduction goals in place which is a necessary first step but unless they are acted upon when it comes to the biggest generators of environmental pollution in the form of reckless, greedy and irresponsible development proposals, it is plain that Camden Council as well as the developers will be seen as knowingly participating in the release of substantial carbon emissions and contributing to further climate change.

Loss of amenity: residents of Parnell House, Stedham Chambers and those living in street properties on Coptic St, will have their skyline, light and general amenity vastly impacted by this enormous structure; it has been described as 'environmental theft'. Drury Lane looking north will appear to be terminated by a massive bookend and people living, working or visiting will experience the full canyon effect of its huge presence. Coptic St residents at the junction with Lt Russell St will be similarly affected by its overbearing presence and will undoubtedly suffer a loss of daylight and amenity.

Of the planned housing within the historic Victorian block, the socially rented flats, disgracefully, will not have access to natural light while others will have light levels of less than 50% of recommended requirements.

This is absurd and unjust when so much space is being allocated for unpredictable take up of offices in Selkirk House. We would urge that a proportion of the housing should be returned to this site.

Pollution: if the application is successful, local residents will be forced to endure 4 ½ years of almost constant noise and pollution from demolition, construction works and vehicles transporting materials throughout the day.

3. Questionable business premise of application: the rationale behind building a huge tower in order to create more speculative office and commercial uses is specious when there is already an astounding 12 ½ m sq metres of vacant office space in this area while simultaneously, commercial outlets, even those with the highest footfall on the high street, are struggling to survive due to online shopping and reduced sales.

4. Housing: only a disappointingly small increase of genuinely affordable housing is being offered with regard to social housing (11 flats) in this amended application which is indefensible during an unprecedented housing crisis. More affordable housing would help to promote social inclusion and a corresponding sense of community and vitality within the area, as many families have been abandoning central London due to exorbitant rents and high mortgage costs as borne out by the closure of a number of primary schools in Camden.

5. Vine Lane: this new pedestrian cut-through from West Central St to High Holborn will merely create an unpleasant, overshadowed, narrow path that will contribute little benefit as it

does not link up with anything in particular, not even to road crossings and will likely attract anti-social activities such as drug-dealing.

6. Alternative uses: there is an intransigence on the part of the developers to consider alternative uses which could help broaden the appeal of the area and enliven what has been a somewhat neglected location. This could be achieved by drawing on the cultural background and traditional activities within Covent Garden and Bloomsbury, and envisaging ways to help sustain and promote them, for example, responding to the shortage of rehearsal space by opening up the rear section of the listed Victorian block on West Central St for drama, music, dance rehearsals and other artistic, educational, film industry concerns as well as wider community uses, such as a market. Suggestions have been put forward to develop the underground postal train network as a destination tourist attraction.

Yours faithfully,

Helen Mc Murray Sec.,
South Bloomsbury TRA