

**From:** P. Bloxham

**Sent:** 12 September 2023 08:30

**To:** Planning

**Subject:** Re: Composite Planning and Listed Building Applications (Composite 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

**Re: Composite Planning and Listed Building Applications (*Composite 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 (formerly Travelodge) (now reference 2023/2510/P and (listed building) 2023/2653/L), originally Labtech application 2021/ 2954/ P)**

This is an additional **objection** to the proposals contained in the Composite Applications.

It is specific to one particular component of the complex proposals which, despite a complete lack of commonality, have been bundled together for reasons best known to the applicant.

This component is the proposal by BC Partners to create an alleyway, to be called Vine Lane, leading from West Central Street to the High Holborn pavement, where it would meet a busy two way highway.

In many ways, this is the strangest component of these Composite Applications.

First, it is not clear why BC Partners, as a private sector developer, takes it upon itself to propose the creation of a pedestrian alleyway. This is all the more strange when the “price” of this alleyway appears to be a 74 metre tower block. This price, and the resulting permanent damage to the Bloomsbury Conservation Area, are wholly disproportionate. No fair weighting of benefits and harms could justify this outcome, particularly when the housing component of the proposals is so inadequate and lacking in light.

It is a remarkable coincidence that the proposal matches so neatly a suggestion made by Camden a few years ago.

Although, as mentioned in separate submissions on the Composite Applications, there has been no public consultation by Labtech or BC Partners on the Composite Applications as a whole, the concept of Vine Lane was the subject of multiple submissions in the Council’s recent Site Allocations consultations, on which a report was issued earlier this year. In the case of

submissions from those who would live most close to “Vine Lane”, the submissions were almost universally hostile, the objections being principally:

- That “Vine Lane” would be a magnet for antisocial activity and crime. The Council will be aware of the problems which are currently experienced (for example) in Grape Street in terms of drug dealing and consumption, as well as the consequences of the wider homelessness crisis.
- It would be a narrow and dark passage which would not be safe for vulnerable people.
- It would attract refuse, increasing the rodent problem in the area.
- It would be dangerous to walk down this narrow alley and emerge into a very busy two way thoroughfare.

As a resident of Grape Street, I endorse these views and adopt them as part of the basis for my objection to this particular aspect of the Composite Applications.

The Vine Lane concept was also tabled in the Council’s “Holborn Vision” consultation.

According to Camden’s website

*we have paused work on the Holborn Vision. We hope to be able to progress this again soon. We will post an update here as soon as possible.*

In the circumstances, it would be quite wrong to allow a private developer to pre-empt the outcome of a consultation process which Camden has decided to pause and where Camden is already on notice of a degree of local hostility. I believe it should be up to the public authorities to decide on the creation of new roads or passageways. If Camden thinks this is a good idea in itself, it should carry out (or complete) a formal consultation and risk assessment on the topic.

The “Vine Lane” idea is also wholly unnecessary. It is known that Camden claims to be keen to encourage pedestrian progress between cultural monuments such as the British Museum and Covent Garden or Soho. However the experience of Camden’s approach to Grape Street (one street west of Museum Street and only yards from the proposed Vine Lane) raises questions as to how serious Camden is in fact about this.

Grape Street and Museum Street, as well as the new (and expensively created) Shaftesbury Avenue Triangle, are natural and existing thoroughfares for this pedestrian traffic. The narrow western pavement of Grape Street has been unsafe and uneven for years, but Camden has done nothing about it, despite being put on notice of the dangers on multiple occasions, and has not even prevailed on developers to repair it as part of section 106 obligations.

Furthermore, no pedestrian crossing was incorporated in the new traffic arrangements on High Holborn at the bottom of Grape Street, which defeats the objective of seeking to provide fluidity between Bloomsbury and Soho/Covent Garden. High Holborn is a barrier to this flow.

There is simply no need for a “Vine Lane”.

I should add that this is another example of the premature nature of the Composite Applications.

There are a number of basic uncertainties about this particular aspect of the Composite Applications, including:

- Would this be a public right of way or a private passage?
- Who would maintain it, and at whose expense?
- Would it be gated?
- Would there be security?
- Would there be cctv and, if so, who would control the resulting data?
- Who would be responsible for cleaning and refuse removal?
- Is “Vine Lane” being treated as part of the open spaces generated by the applicant’s proposals?
- Is Vine Lane being alleged to constitute planning gain or community benefit resulting from the Composite Applications?

The Council and the developer’s representatives have given conflicting answers to these questions, to the extent they have replied at all. I would question whether, in considering the Composite Applications, there is any benefit to weigh in the balance from the creation of “Vine Lane”, even if it is proposed to be a public space (and therefore maintained at public expense). The Composite Applications should be rejected. The applicant should be encouraged to re design the proposals, eliminating Vine Lane and reducing the height of the 74 metre Skyscraper, so that it is no higher than the existing structure.

In this connection I note that the Council’s own Conservation Officer has gone on record to state that the proposals in the Composite Applications would increase harm to the Bloomsbury Conservation Area.

Regards

Peter Bloxham

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