

From: Peter Bloxham

Sent: 23 September 2023 09:34

To: Planning

Subject: planning and listed building applications refs 2023/2510/P and 2023/2653/L

Dear Sirs

please see attached as a further basis for objecting to the above applications.

Regards

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Planning Team
And
Listed Buildings Team
London Borough of Camden
Town Hall
Argyle Street
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By email

23 September 2023

Dear Sirs

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)

I refer to the Composite Applications.

I am writing with further bases on which I object to the Composite Applications. For clarity, I refer to them as “composite” not simply because there are both planning and listed building applications but because the applications constitute multiple and varied proposals for the different sites within what the applicant chooses to present as a single project.

This letter focusses principally on the fact that the proposals included in the Composite Applications are in contravention of multiple policies promulgated by Camden.

I have not had time to consider whether London-wide or national policies are also infringed. I trust Camden will investigate this before making any recommendation or decision on the Composite Applications.

I invite the Council to reject the Composite Applications in their present form, for the reasons set out below.

Introductory Comments

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 and traffic disruption) of the demolition and construction period (which has, alarmingly, grown from 3 years (December 2020 zoom) to “approximately” four years in the space of just over 6 months).

My review of the Composite Applications and my ability to make informed and comprehensive submissions on it have been hampered in a number of respects:

- The applicant’s professional team have pursued a consistent policy of evasiveness when one has attempted to clarify matters. As a result, fundamental aspects of the proposals and, just as importantly, how and over what period of time they would be implemented are unclear. This policy of opacity was made more explicable, if not more justifiable, in the light of the categorical statement by Jonathan Watson of Labtech at the zoom meeting on 15 April 2021 arranged by local community groups. As recorded in multiple contemporaneous notes, Mr Watson made clear that Labtech had no intention of consulting with residents and the local community. This policy seems to have been followed through by BC Partners.
- In line with their consistent approach to avoiding transparency, Labtech declined to make available hard copies of their application documents, suggesting that this is a responsibility of Camden, not of Labtech. They also used Covid as a further excuse for non engagement. In July 2021, Labtech’s apologists were claiming that Covid restrictions prevent them sharing a physical model of the proposals;
- The Council has also been disappointing in failing to respond to questions going back to December 2020. Some of these relate to the applicability of Camden’s own policies relevant to the application. There has, sadly, been a consistent pattern of Camden simply ignoring communications in relation to this project.

The combined lack of engagement or responsiveness by both Labtech and Camden makes it difficult for members of the public (Camden’s Council Tax payers) properly to comment on, and make representations in relation to, the Composite Applications and may render the entire process open to challenge. I reserve my position on this point.

I am particularly concerned that I simply do not understand in any detailed manner Labtech's proposals for the siting, height and overall form of the new structures in West Central Street. These are the part of the proposed development closest to my home in Grape Street. They also form part of the complex overall project on which Labtech and BC Partners have refused to consult. I am told (although I could not find a mention on the project website) the proposed structures include one or more new electricity substations, which is potentially alarming in itself, given its proximity to residential blocks.

I plan to write separately with submissions on the West Central Street aspects of the Composite Applications.

The Council's Policies

The comments below are taken from policy documents found on Camden's website.

Paragraph 1.6 of Camden's policy document on Design states:

It is important that new developments respond positively to the historic environment in Camden to contribute to its sense of place

Proposals for a series of sites, separated by the public highway, so close to one of Hawksmoor's masterpieces, only a little further away from the British Museum, which are partly located within the Bloomsbury Conservation area and which include Listed Buildings (hence the separate Listed Buildings application), require scrupulous adherence to this principle. When one seeks to consider how the Labtech/ BC Partners proposals meet this criterion, one is faced with a proposed structure with little to distinguish it from a visual perspective apart from its height and bulk, as well as its conspicuousness. One senses that Labtech is at least slightly embarrassed by it: one of the fliers circulated by Labtech as part of its propaganda campaign was eloquent by omitting any image of the completed structure. Surely if Labtech were proud of this as a positive contribution to the historic environment, the artist's or cgi impression would figure prominently on the flier.

Similarly, the applicant's website omits any mention of the height of the proposed skyscraper. The model which exists of the proposals, which is very eloquent in demonstrating how out of place the proposed skyscraper would be, has been conspicuous by its inaccessibility.

Paragraph 2.7 takes this principle further by stating explicitly:

The Council will not approve design which is inappropriate to its context or fails to improve the character of an area.

It is impossible to argue that a new and highly conspicuous bulky 74 metre tower block would be appropriate to the edge of the Bloomsbury Conservation area or to a site which itself includes listed and historic buildings and is so close to St George's and the British Museum.

Paragraph 2.10 sets out some "principles of high-quality design"

- *Development should respond positively and sensitively to the existing context*
- *Development should integrate well with the existing character of a place, building and its surroundings.*

The proposed bulky 74 metre tower block fails in all these requirements; there is no evidence of any sensitivity at all, or any attempt to integrate this out of scale tower block with the scale of the surrounding buildings; indeed, the proposed 74 metre tower block is not even appropriate to the historic and listed buildings on the rest of BC Partners' sites covered by the Composite Applications.

Paragraph 2.11 continues, talking of good design responding to the context by:

- *Ensuring the scale of the proposal overall integrates well with the surrounding area*
- *Carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area*

One look at the cgi impression of the 74 metre tower block (even without access to the model) demonstrates that this requirement has not been met.

The Camden Planning guidance/ Design has a specific section on Tall Buildings.

There are a number of important and relevant policy statements, notably:

In 2.17:

How the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of the building affects the skyline

....

The historic context of the tall building's surroundings

2.20:

Key considerations relate to the integration of a building into its immediate context and impact on the public realm

2.22:

Furthermore, careful consideration should be given to the impact of a proposal on the sky view and skyline from the public realm

It is hard to see how the proposed bulky 74 metre skyscraper could meet these entirely sensible and rational policies.

The proposed 74 metre tower block simply does not relate to its surroundings at all, except by overshadowing them.

It is evident that the top of the building would adversely affect the skyline, as is shown even from the limited cgi images made available by Labtech and BC Partners; an apologetic (and manifestly inaccurate) claim once offered by Labtech's team, to the effect that the 74 metre tower block would be "invisible" from the British Museum, is another illustration of the embarrassment of Labtech, (as the progenitor of this concept) as to the unsightly and out of character impact of the proposed bulky 74 metre tower block.

The proposed bulky 74 metre skyscraper would be situated on the exact edge of the Bloomsbury Conservation area and would dominate and overshadow the southern edge. The sites included in the Composite Applications, taken as a whole, include listed and historic buildings which would be at the feet of, and dwarfed by, the proposed 74 metre tower block. They would be deprived of natural light. The 74 metre skyscraper would itself spread light pollution from its 74 metres of structure across Bloomsbury, Covent Garden and Central London generally.

Despite the fact that some of the sites contain listed properties, BC Partners appear to have made no attempt to propose a unified whole with the new elements harmonising with the renovated buildings.

Their own published description of the sites shows no understanding of the sensitivity of the plots they have acquired or of the area in which they are situated:

*Example 2: In June 2022, BCPERE I purchased a development site in central London, on Museum Street, **close to Tottenham Court Road Station**. It comprises a 15-storey former Travelodge hotel, a 5-storey car park (at the foot of and underneath the vacant hotel building), **and a collection of smaller adjacent buildings**. Excluding the carpark, it totals c.90k sf. BCPERE aims to redevelop the site into a ground plus 18 story office tower, along with some retail and residential (see above picture). This development will target highest environmental certifications, such as BREEAM Excellent, Well Platinum and net zero carbon on operations.*

(emphases added)

This reveals that, for the private equity vehicle BC Partners, the sites included in the Composite Applications are just another piece of central London real estate, to be exploited for their private profit and with no regard to historic or heritage context.

As for the historic context, apart from the Conservation Area itself and the individual listed buildings, St George's Bloomsbury is only yards away (but seemingly not even mentioned in the SCI) and the British Museum is at the top of Museum Street. The omission of St George's from the SCI shows how little attention that historic monument has received in terms of respect for the Council's planning policies.

I note the Camden policy document also refers to more technical aspects such as microclimates, wind turbulence and overshadowing. Light pollution might be added to the list. These are genuine concerns in the case of the Composite Applications, particularly bearing in mind that both West Central Street and Grape Street are already narrow streets. I have not had time to find out whether these issues are dealt with among BC Partners' voluminous filings.

I understand that BC Partners have been reluctant to carry out exercises which would illustrate in more detail the impact which the proposed 74 metre skyscraper would have on the overall environment and views from various sensitive points in the vicinity. This evidences the defensiveness of BC Partners towards its controversial proposals.

I find it hard to believe that Camden could sanction a building of such a height in so sensitive a position. In this connection I note that the 2018 draft Holborn Vision document sets an aspiration for:

High quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and improving community safety.

It is not evident that the proposed development meets this proposed standard. Has this aspect of the draft Holborn Vision been abandoned by Camden?

I accept that the current building has no particular merit. I would also argue that it is out of proportion to its urban context and the conservation zone in which it stands. However, replacing one bulky stump with another, much taller and more conspicuous, one is not a basis for applying today's planning and environmental policy.

It is interesting to note that those undertaking the recent redevelopment of the adjacent Post Building (ex Royal Mail sorting site) limited their ambitions to a level which more or less fits in with the adjoining Commonwealth House Building. One is tempted to assume

that planners have to date established as a maximum acceptable height in the area the peak of the LSE student accommodation on High Holborn, which is itself further removed from the Bloomsbury Conservation Area. Judged by these standards, even the current Travelodge tower is excessive. A bulky skyscraper of a considerably greater height must surely be out of the question.

The cgi image of the proposed Tower, as seen from the British Museum courtyard, demonstrates by itself how unsuitable and invasive the proposed 74 metre tower block would be. As already mentioned, I was troubled by the arrogant and dismissive way one of the developer's propagandists asserted that the proposed 74 metre tower block would not be noticed by visitors leaving the Museum. Self evidently, this argument is incapable of substantiation. One might expect rather more compelling arguments to seek to justify this conspicuous protuberance.

The use of such an argument is telling in itself: the only way of justifying the proposed Tower is by pretending it isn't there.

In summary, Labtech's proposals breach numerous fundamental requirements of Camden's own design guidance.

For these reasons alone, the Council should reject the Application. Any approval would be susceptible to challenge based (among other grounds) on invocation of the Council's own policies and principles.

Yours faithfully,

Peter Bloxham