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Queen Alexandra Mansions
Grape Street
London WC2H 8DX

Planning Team
And
Listed Buildings Team
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

25 October 2023

Dear Sirs,

Re: Composite Planning 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, as well as to previous correspondence and emails. I describe them as *Composite* not just because there are both Planning and Listed Buildings applications but, just as importantly, because the applicant has chosen to lump together some very disparate proposals, relating to parcels of land whose status differs, in the sense that some of the parcels are actually in the Bloomsbury Conservation Area, whereas others adjoin (and potentially threaten) it. Within the applicant's plots in the Bloomsbury Conservation Area, there are some listed buildings. These are, in reality, a series of separate applications which have, for the sake of the applicant's own commercial interests, been artificially bundled into a single planning application, now described on behalf of the applicant as a "resubmission" and as largely unchanged in respect of its most significant and controversial component.

This bundling creates unfair results.

I regret any inconvenience caused by making these submissions somewhat late in the process. It has taken since January until this month to obtain from the applicant a modicum of information about those aspects of the Composite Applications covered by these submissions, sufficient to make reasonably informed comments on those aspects.

As previously mentioned, I am making a series of submissions in relation to different aspects of the Composite Applications. This is a further representation in opposition to both the Planning and Listed Buildings elements of the Composite Planning Applications. It focuses specifically on the proposals for structures on West Central Street.

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, dust and traffic disruption) of the demolition and construction period (which has, alarmingly, grown from 3 years (December 2020 zoom) to at least four years (as per the project website). I am therefore particularly concerned about what may be proposed (and the planned methods of execution) for the West Central Street (**WCS**) plots the subject of this letter.

The presence of asbestos, as well as the apparent engineering challenges, raise serious safety concerns.

It is also troubling to read that the scheme has been described by professional property valuers as not being viable, particularly when implementing it requires numerous risky interventions.

This letter supplements submissions previously made in opposition to both of the Composite Applications. It does not deal with the controversial "Vine Lane" proposals, about which I have written separately.

I will divide my submissions on the West Central Street aspects of the Composite Applications into three broad sections, beginning with some general comments. I end with some submissions specific to the difficult issues which any demolition or construction project would entail.

General

It is unfair that the artificial combination of the various diverse proposals contained within the Composite Applications has meant that the understandable focus on the most controversial aspects of the Composite Proposals, namely the proposed bulky and tall (74

metres) skyscraper, together with the associated (arguably unnecessary) demolition exercise, has in practice precluded full consideration of the serious issues arising out of the WCS aspects of the Composite Proposals.

It is a great pity that the proposals the subject of this letter could not be the subject of a separate application and the full consideration they merit. I get the impression that these important proposals in and affecting the Bloomsbury Conservation Area have not had the consideration and debate, by planning, listed building and environmental teams within Camden, as well as publicly, which they require.

I understand that this means that the Council is presented with an “all or nothing” choice. The applicant has evidently accepted the consequences of this approach.

However this does at least mean that the Council must have regard to the implications for the WCS plots discussed below of the proposed bulky 74 metre skyscraper planned for the other side of WCS. The proposed skyscraper would plunge the plots, as well as adjoining buildings, into darkness, as well as inflicting other damage on those plots and the wider environment. Sadly, many of the images on the onemuseumstreet website appear to assume that shadows and clouds do not exist. They are therefore misleading.

The plots the subject of this submission are part of the Bloomsbury Conservation Area. Some of the individual buildings are listed buildings (hence the requirement for a separate Listed Buildings application).

I have already made clear in previous submissions that I consider that the Composite Applications are premature and should be rejected on that basis (among others). I continue to hold that view. I understand that aspects of the plans previously submitted are still being redesigned.

This is an important substantive point, because the sheer amount of missing information means that the current process of affected persons having the right to make representations on the Composite Applications becomes unfair, as we are operating in the dark. It is all too easy for the applicant to respond to a concern by indicating (in a completely non-binding fashion) that it would be dealt with in some subsequent process. Even if that were to happen, the process would be an opaque one. The fact that (as it appears) the project is currently stated by Gerald Eve not to be viable only increases concerns that economy measures (agreed between the Council and the developer without proper involvement of those affected or at risk) would be taken after the event which would be prejudicial to local residents and businesses.

I can understand that a certain amount of detail would inevitably fall to be dealt with after the event, should the Composite Applications be approved in any manner, subject to any subsequent review or appeal processes. However, the sheer quantity and materiality of

the unresolved issues makes the Composite Proposals in their current form impossible properly to assess.

For that reason, I would submit that the Composite Applications are not yet in a condition where the Council can properly discharge its legal responsibilities to carry out a thorough and independent assessment of the proposals themselves and their impacts:

- during demolition and construction and
- in terms of the permanent impact both on the local heritage and environment and on central London generally.

It may not even be possible for the Council to assess the extent of the purely financial risks to which it would be exposing itself if it were to approve the Composite Applications. The Gerald Eve materials make clear that these risks do exist.

Allowing a pause in the application process would have the merit of enabling more suitable alternatives to be considered.

One final, general, point. This is about the condition of some of the existing properties comprised within the Composite Applications and the need for their refurbishment, as highlighted by the applicant. No one can deny the need for refurbishment. Indeed, it is a pity that Labtech and BC Partners have neglected their estate for so long (as well as allowing unsuitable tenants in parts of the estate), contributing to the poor conditions currently all too evident. Sadly, the applicant uses images of the poor condition as part of its propaganda campaign on its website and in other materials, as if the only way of improving the area is to build a bulky 74 metre skyscraper (cgi images of which are in short supply). It is a fallacy to assume that, because refurbishment is required, it follows that the applicant should be allowed to erect a bulky 74 metre tower and do damage to the Bloomsbury Conservation Area. Given how central this area is, a programme of refurbishment ought to pay for itself over time, without being financed by a (seemingly non viable) speculative skyscraper.

The plots and Listed Buildings in the block bounded by Museum Street, West Central Street and New Oxford Street (*Island Block*)

I should begin by saying that the cgi images in relation to the Island Block on the applicant's website in respect of this aspect of the Composite Applications are few and sketchy. It is therefore hard fully to understand what is being proposed, to match the verbal description on the website with the limited number of images or to visualise what the completed result (overshadowed by the proposed skyscraper) would actually look like. It is particularly hard to see how densely packed together the structures would be and how little natural light individual buildings and rooms would have access to.

The first point to make is that one of the many complications for the applicant about its proposals, insofar as they relate to the Island Block, is that the plots are not the whole block. Any proposals must therefore be in keeping with those buildings and parcels not within the applicant's ownership.

I do not consider that there is sufficient harmony between what is proposed and the remaining buildings in the Island Block not included in the Composite Applications. This is most visibly demonstrated by the considerably increased height of the new structure (**Corner Structure**) proposed for the corner of the Island Block (where WCS turns), which is both considerably higher than the existing structure and much taller than the buildings which would neighbour it. This is particularly unacceptable given that these buildings are part of the Bloomsbury Conservation Area.

Given that this part of the Composite Applications is in the Bloomsbury Conservation Area, it is submitted that the existing structure at this corner should be retained, suitably refurbished. There is no justification for increasing the existing height.

It should also be noted that the proposals for the Corner Structure appear to represent a retrogression, compared to the original 2021 proposals. It is not clear how the applicant can justify making its proposals for the Bloomsbury Conservation Area worse, given that the benefits offered by the applicant are rather marginal when weighed (as they must be) against the huge planning gain (an additional 20 metres of height, spread across a much more bulky structure, with a significantly deleterious impact on the heritage and skyline) sought.

Furthermore, some of the buildings, both comprised in the Composite Applications and excluded from the applicant's ownership, are listed buildings. Although the applicant has made some cosmetic changes to the designs included in the 2021 application, those changes are insufficient either to reduce the damage to those listed buildings (mentioned by heritage organisations) or to produce adequate housing units.

WCS is not particularly wide. The cumulative effects of:

- the proposed skyscraper (and the shadow it would cast, as well as the blocking of sunlight at certain times of the day),
- the proposed new Corner Building and
- the West Structures (defined below),

would be that the applicant is proposing to create new and unjustified overlooking issues, as well as problems of inadequate natural light levels, as discussed below. It is particularly perverse and inexcusable to propose to create new housing units (presented as part of the Council's planning gain) which, as an inherent result of their design, lack adequate levels of natural light.

Adding the storeys to 35-37 and 39-41 New Oxford Street would only exacerbate the lack of natural light in the residential units in and around the Island Block and in the tiny yard in the centre of the Island Block.

The plots on the west side of West Central Street

Although the model of the proposed development was not on public display for very long and was replaced by a somewhat misleading two dimensional image, it is clear that the structures proposed for the west side of WCS would be inserted in a canyon surrounded by other buildings and with very narrow spaces between the new structures and adjoining buildings.

I understand that the new structures on the west side of WCS (**West Structures**) would consist of retail premises at ground floor level, with private residential accommodation above, reached by open (but covered) walkways at each residential level overlooking a rather narrow blind yard between the rear of the West Structures and the rear of QAM.

The proposed West Structures would have an impact on two adjoining residential buildings:

- The Fire Station, 14 West Central Street; and
- Queen Alexandra Mansions (QAM), Grape Street.

The proposed West Structures give rise to the following problems:

Overlooking

It should be borne in mind that there are two damaging aspects of overlooking. The first is the actual experience of loss of privacy when a stranger looks into one's home. The other, just as pernicious, harm is the sense that, as a result of a permitted construction, one has lost one's privacy and that, at any moment, a third party is able to, and might, watch one at home (whether this happens or not).

West Structures

The West Structures would face being overlooked by the Corner Structure. They in turn would overlook both the Corner Structure and the adjoining buildings on the other side of West Central Street.

I am assuming that the West Structures would not have any fenestration on their western walls (ie overlooking the narrow yard), so that any overlooking from QAM would be limited to the walkways.

Fire Station and QAM

For the Fire Station and QAM, the overlooking problem would be caused principally by two factors:

- the existence of the walkways, which would presumably be open to all residents and their visitors; and
- the proposed outside terraces at various levels in the West Structures. It has been suggested that this overlooking might be mitigated by the presence of plantings, but it is hard to see that this proposal is a reliable or permanent solution.

The very small amount of space between the edge of the walkway of the West Structures and QAM would exacerbate the overlooking problem.

I have not been able to work out whether the Fire Station and QAM also face a separate overlooking problem from the upper floors of the Corner Building.

All residential units

On the subject of overlooking, I note that the images of the proposed skyscraper appear to show outside terraces at various levels as part of that building. The existence of these terraces may raise separate privacy and overlooking issues for the Island Block and properties in WCS and Grape Street, such as arose recently in the *Tate Britain* case.

Loss of light

Homes in both the Fire Station and in QAM would have light levels reduced as a result of the West Structures. This is particularly the case for south facing windows in the Fire Station, but the light levels in, and views from, some of the QAM flats would be blocked by the height of the West Structures and possibly also by the Corner Block.

Light levels might be expected to be further reduced by the shadow from the proposed skyscraper and its blocking the sunlight at certain times of the day.

The new structures (Corner Structure and West Structures) would themselves have very limited access to natural light, for the following reasons:

- As already mentioned, WCS is a narrow street, which reduces daylight;
- The Corner Structure and the West Structures would be in the shadow of the 74 metre skyscraper, which would also block out some light at points in the day;
- The West Structures would also lose light because of the height of the Corner Structure.

To the extent that there are intended to be any window openings on the west side of the West Structures (ie overlooking the narrow yard), the passageway would itself reduce light levels in the residential properties in the West Structures.

Other points

I would add some other points:

Noise

Quite apart from the noises emanating from the West Structures and their outside terraces, there is a serious risk that the narrow yard behind the West Structures becomes a noisy echo chamber, amplifying outside noises and generating noise nuisance for residents of the Fire Station and QAM (and indeed for residents of the West Structures). In this connection I note from one of the cgi images on the website that there may be proposed to be a (public or private?- not clear) childrens' playground in this dark and confined space.

There is a separate noise and vibration problem which seems not to have been adequately addressed by the applicant or its specialist adviser (Scotch). The Central Line underground tunnels run close by. Since the introduction of the Night Tube (and despite assurances by TFL to the contrary), there is a problem at weekends for some local residents of excessive levels of noise and vibration nuisance caused by poorly maintained trains and/or track. Some of the new homes in the West Structures and also in the Island Block may be susceptible to being blighted by this problem. The applicant appears not to have addressed how to mitigate it.

Electricity substations

The detail of the proposals on this topic remains very sketchy, so all I can do is to express concern about the proximity of electricity substations to existing and new residential properties.

Issues in relation to any demolition or construction programme

It is impossible to address all these issues comprehensively, because of the problem, mentioned above, that a large number of key details have been deferred to a later stage, when there would be no mechanism for those threatened by the proposals and the implementation of a permission granted to raise effective challenges.

The materials submitted by the applicant in relation to demolition and construction are so vague and formulaic as to be, in essence, uninformative.

I will therefore confine myself to a small number of key points:

- the various parcels the applicant wishes to demolish and develop are in a very densely occupied and busy part of London, surrounded by important arterial roads. Carrying out works and bringing and removing materials would be very complex, as well as disruptive to those living and working in the area or getting about London, including for the Emergency services.

- Museum Street and WCS are the only vehicular access to WCS and Grape Street, so must remain open throughout what would be a multiyear proposed project. There must be no road closures.
- The proposed works to create the Western Structure and in and to the Island Block would be taking place very close to the Fire Station and to QAM.
- Even underground there are complexities because of the Royal Mail tunnels. This would apparently necessitate a considerable amount of delicate piling work. Piling is very noisy and causes significant vibration. Experience of the piling activities carried out by the Shaftesbury Theatre a few years ago, which made it impossible to work or make calls in my home while it was going on, suggests that it would be reasonable to expect the applicant to re locate residents during these activities.
- I understand that some of the piling would be carried out very close to (or even underneath) the rear supporting wall of QAM. This is because the West Structures currently have no foundations, being proposed to be built in part on what is currently a ramp leading to an underground car park. I understand that it would be necessary to use piling to establish foundations. These activities would be felt very vividly. There must be a risk that the foundations of QAM or the Fire Station would be damaged by these works.
- The applicant's proposals raise very serious safety issues for people living and working close by, because of the complexity and riskiness of some of the interventions apparently required.
- Consideration needs to be given to alternative parking places if the car park is closed permanently.
- Grape Street, despite being very narrow, is technically two way for cyclists and has Cuban Embassy diplomatic parking spaces. Grape Street is not wide enough to be used as a vehicular thoroughfare for demolition and construction traffic. The dangerously uneven pavements already bear the marks of overloaded trucks mounting them in order to get down the street. Should this proposed development proceed in any manner, the applicant's trucks should be required to exit by turning right into Bloomsbury Way at the top of Museum Street rather than turning into WCS and from there into Grape Street. There is a wider pedestrian and cyclist safety issue arising from the fact that this project would be being carried out in part of the edge of the newly pedestrianised Shaftesbury Avenue Triangle.
- The sheer duration of the demolition and subsequent construction works, which is uncertain but likely to be in the region of at least 5 years is a problem in itself.
- I am concerned by the health issues for residents associated with the amount of dirt and dust, as well, potentially, as asbestos fibres that might be released by the demolition works.

Conclusion

I do not think adequate consideration has yet been given to the proposals, forming part of the Composite Proposals, for the Island Block or the West Structures and their impact on existing neighbouring residential and commercial buildings and occupiers.

In particular, these aspects of the Composite Proposals:

- Fail adequately to respect the Bloomsbury Conservation Area, the listed buildings in it or the wider heritage environment;
- Seek to squeeze larger amounts of new residential accommodation on to plots than those plots can in reality accommodate; as a result, that accommodation (even the private units) would be of poor quality;
- Seek to erect a structure, the Corner Block, which is unsuitable and disproportionately high; this entails unnecessary demolition;
- Have failed adequately to address the serious problems of lack of access to natural light for the new residential units proposed; and
- Would impair the established rights of light and privacy of existing residential units.

I consider that, in their present form, in addition to the specific problems mentioned above, these aspects of the Composite Proposals would be likely to inflict undue, disproportionate and permanent harm on existing occupants, particularly those who live in the Fire Station and QAM.

I also consider it unacceptable to be told that important problems arising out of the Composite Applications would be dealt with at a later stage, after planning permission had been obtained.

Please treat this as an objection to the Composite Planning Applications in their current form and place this objection on the portal for both Planning and Listed Building Applications.

This is an open letter.

Yours faithfully,

Peter Bloxham