



Attn David Peres Da Costa
Planning Department
Camden Council

12 January 2023

Dear David

2023/4791/P: Welfare accommodation on land to the west side of Argyle Square London WC1H 8AS

The Bloomsbury Residents Action Group (BRAG) objects strongly to the above Planning Application which relates to the proposed use of land to the south-west side of Argyle Square for welfare accommodation needed for the construction of Belgrove House, which is currently taking place between Belgrove Street, Crestfield Street and Euston Road to the north of the square.

We note this welfare accommodation has already been constructed, without the benefit of planning permission. Its scale is utterly inappropriate within a Grade II listed Square of Georgian terraces, and completely disregards the residential amenity of the properties immediately adjacent.



Inadequate investigation of alternative options

The Friends of Argyle Square have shared a plan with information from Mace (the contractors) regarding investigation of a site for welfare accommodation.

Note the section (highlighted below) which states accommodation would not be suitable for Belgrove and Crestfield Roads because "Accommodation in direct proximity of existing properties." This is correct - there are hotels opposite.

But the portacabins have been erected on land west of Argyle Square that is also "in direct proximity of existing properties." Such inconsistency is unacceptable.

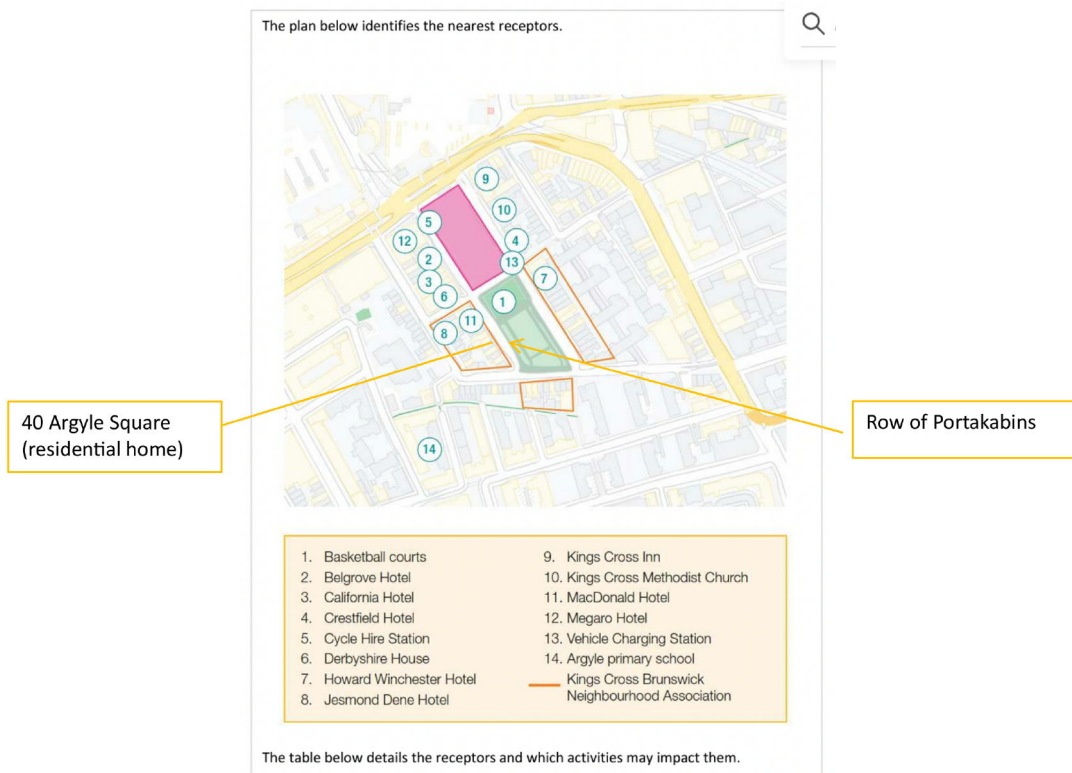


BRAG is a member of the Belgrove House Construction Working Group and received a copy of the Minutes of the meeting held on 19 October 2023.

During this meeting it was explained by Andy Griffiths of Mace that *"off-site options were not viable as potential local venue owners didn't want to lease their properties for construction workforce welfare facilities"*. There were no details provided about exactly what options had been explored, in relation to who had been asked and details of their refusal.

I note in the Construction Management Plan for Belgrove House there is a plan that identifies important "Receptors". It is interesting that this fails to identify residential properties, such as 40 Argyle Square, which is a family house where the health and welfare of the permanent residents should be properly taken into consideration.

Why exclude this from the initial research; and then use the location immediately opposite this building as a site for welfare accommodation? [See plan from CMP on following page]



Plan showing how residential properties, such as 40 Argyle Square, were omitted from identified 'Receptors'

It is not acceptable for the family at 40 Argyle Street, and the neighbouring properties between 36 and 42 Argyle Square to suffer increased noise nuisance, increased light pollution, noise from air conditioning units, loss of residential parking bays, loss of light (habitable rooms in lower ground floor) and loss of visual amenity (the adjacent green space) due to the siting of welfare accommodation which relates to a building site some considerable distance away.

Even though the welfare accommodation is not permanent, the "temporary" inconvenience is years, not months.

Why not make use of space within the basketball court to the north of Argyle Square, opposite the building site? It would mean that this recreational facility would be out of use for three years, but why should this inconvenience be more significant that the inconvenience to residents for the same period of time? Has there been any discussion regarding the possibility of using some of this public space for the welfare accommodation?

And why is the application for three years? This is a long time for something "temporary." Why can't the welfare accommodation be moved back to the Belgrove House building site at a much earlier opportunity, ie before the building is finally fitted out?

Use of the pavement on the north side of Argyle Square was ruled out with the words “no space for accommodation” but how much effort went into exploring the possibility of a gantry? A gantry was used along Tavistock Place when the redevelopment of LSHTM took place. The space available was extremely narrow. The pavement still provided access to pedestrians.



Figure 19. Photograph with embedded mark-up of welfare accommodation.

Example of proposals for welfare accommodation in a tight space along Tavistock Place, using a gantry

BRAG does not believe that sufficient effort has been made to secure a suitable site for welfare accommodation for the Belgrove House development. Placing it in the current location is also unacceptable from Camden’s own policies regarding residential amenity and heritage.

Camden policies: Residential Amenity

Approval of planning applications rely on the Council’s Planning Policies. These have been designed to take into consideration the impact on residential amenity. See Camden’s Guidance document, “Amenity,” published January 2021. This guidance relates specifically to a development’s effect upon a neighbour’s outlook, privacy, sunlight/daylight and any noise and disruption likely to arise directly or indirectly as a result of development.

Camden's Local Plan (2017) Policy A1 - Managing the Impact of Development "Seeks to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities."

Policy DP 26 states that the Council would only grant permission for development that does not cause harm to amenity. It states that the Council should consider the impact on daylight, sunlight, outlook and increased sense of enclosure, privacy and noise.

Residents living at 40 Argyle Square, particularly if they work from home, will have to endure the noise and inconvenience from the construction of Belgrove House, a major ten storey development. It is adding insult to injury for the developers to plonk their welfare accommodation immediately in front of residential property. The ground floor and lower level will suffer loss of daylight and sunlight. There is a loss of outlook as the view of the green space (Argyle Square Gardens) has been blocked by the portacabins.

I note from visiting the site today that lights have been fitted on the outside of the portacabins. These will cause light pollution and impact seriously on residential amenity at night, being so very close to the adjacent terraced properties.

The application should be refused on the grounds of loss of residential amenity.

Camden policies: harm to heritage

The application should also be refused on the grounds of harm to heritage.

Argyle Square lies in the Bloomsbury Conservation Area, and the terraces on three sides of the Georgian square include a large number of Grade II listed buildings. These are heritage assets. The portacabins also intrude on important views across the square.

Policy D2 Heritage of the Camden Local Plan 2017 states that development will not be permitted if it results in harm that is less than substantial to the significance of a designated heritage asset, unless the public benefits of the proposal convincingly outweigh that harm. There is no public benefit attached to this application for welfare accommodation on land on the west side of Argyle Square.

Argyle Square is part of an important historic neighbourhood that is popular with tourists, yet another reason for the welfare accommodation to be placed in a much more suitable location. The presence of the portacabins immediately in front hotel accommodation will impact negatively on local business too.

Conclusion

The Bloomsbury Residents Action Group urges Camden to refuse the application and to insist that Mace finds an alternative solution.

Yours sincerely,

Debbie Radcliffe
Bloomsbury Residents Action Group (BRAG)

91 Judd Street, London WC1H 9NE