

Planning Application Number 2023/5130/P

I am writing to object in the strongest terms to the above Planning Application.

A – Cumulative impact of applications in the same area

It is the second planning application for a large demolition and reconstruction project located on Brooke Street and submitted to Camden Council within the past six months - the other application was submitted in 2023 for the 2 Waterhouse Square building (“2WS”) and it is scheduled for discussion at the next Planning Commission meeting (15 Feb 2024).

Unfortunately, application 2023/5130/P denies the existence of the 2WS planning application (Construction Management Plan: “No construction work at neighbouring properties is proposed and therefore there is not expected to be any conflict with neighbouring sites”) and therefore the cumulative impact of the two applications is not addressed at all.

Needless to say that the cumulative impact of this second application would be overwhelming for the local community and notably its most vulnerable residents, not only in terms of noise and air pollution as well as traffic management issues during the anticipated works, but also the impact of the loss of light post construction.

B – Ignorance of the make-up of the local area

The application fails to mention the presence of many residential buildings located around the Brooke’s Market square area (e.g. Langdale House, Cranley Building, Beauchamp Building) [Planning Statement: “To the east, on the other side of Brooke Street, is the Waterhouse Square office complex”]. Most importantly it completely ignores the fact that vulnerable residents live at The Lodge, managed by St Mungo’s and located c25m away from the proposed construction site.

C – Lack of consultation with the local community

The woeful ignorance of the make-up of the local area combined with the absence of any consultation with the local community to date (except for two business associations) are two key issues which should be of great concern to the Planning Commission as this has now become a pattern of the applications submitted in our local area.

The comment made in the Planning Statement speaks for itself: “The Applicant has also carried out community consultation in the form of an introductory newsletter and a public exhibition in June 2023. The exhibition was attended by two representatives of the Central District Alliance (CDA) and Hatton Garden Business Improvement District (BID), both of whom made supportive comments”. This represents a very low bar if this level of engagement were deemed to meet the criteria of meaningful consultation and it frankly leaves me wondering about the level of scrutiny applied during the pre-application process if this is considered as “good enough”.

D – Inadequate traffic management plan

According to the Construction Management Plan, construction vehicles are anticipated to access the site/stop along Brooke Street. Unfortunately, the 2WS application is suggesting to use the same access point for their construction vehicles and it therefore seems completely unrealistic to envisage having construction vehicles supporting both sites at the same time using the same street.

It is worth noting that Brooke Street is the only road available for residents living around the “Brooke’s Market square area” to reach their homes. The Construction Management Plan states: “There is no through

traffic from Brooke Street to Leather Lane, and therefore vehicles on Brooke Street are associated with the operation of the commercial/residential units along Brooke Street and therefore construction traffic would have a minimal impact on surrounding traffic and neighbouring properties". So residents leaving around the square are completely discounted and no consideration is given to their daily and emergency needs (e.g. access for deliveries, for contractors such as plumbers or more worryingly for emergency services such as an ambulance).

Reference is also made to the fact that trucks can turn around the "Brooke's Market square area". As I discovered during discussions with developers of the 2WS planning application, this type of statement is based on computer-based simulations and does not survive when confronted with "on-the-ground" reality.

E - Impact on my children's mental wellbeing

Many children (including mine) live in the residential buildings near the proposed construction site and they have recently been significantly affected by the Covid pandemic, with negative and potentially long-term impact on their mental wellbeing (as vastly documented through numerous national surveys since then).

Living less than 50 metres away from two major building sites for another period of 2-3 years with a high level of noise in the background (and vibrations), will undoubtedly affect their mental wellbeing again. This is clearly not a viable option which I feel comfortable with as a parent.

F - Impact on my children's physical health

As mentioned above, I am also concerned about the threat of accidents related to having numerous lorries frequently coming and going in the vicinity of my home as my children make their way to and come back from school...

Beyond this obvious physical danger, there will be the invisible and silent long-term effects of air pollution on my children's lungs (again well documented and with damaging consequences). The amount of noxious particles which they will have to breathe on a daily basis as a result of the construction works and lorries' fumes is simply not acceptable. As London mayor Sadiq Khan recently reminded all Londoners when Ulez was expanded: "Clean air is a right not a privilege" and "4,000 premature deaths a year are linked directly to air pollution". I do not wish to add my own children to this dreadful count.

The air quality report discounts the impact of this construction site as negligible but this is really hard to believe when our local area is already recognised as one of the worst areas in the country for air quality and when benchmark levels in the report presented are taken from 2021 (in the middle of the pandemic when no one was working in Central London), I do really wonder about the validity of the studies produced.

G - Incoherence of local environmental policies

Camden Council has positioned itself in favour of "green policies" over the past few years, notably by encouraging the development of cycling lanes in the area during and after the pandemic.

It would now seem completely incoherent for the Council to authorise yet another re-development of a commercial building located in the middle of a large residential area as the demolition proposed would undoubtedly generate an enormous carbon footprint in the short term.

I would also like the Council to be aware of the fact that this application is one of a number of planning applications located in a single geographic area with detrimental cumulative impact on the wellbeing of local residents, including very vulnerable ones. I would welcome a more holistic approach by the Council

when considering planning applications as their combined consequences are unfortunately a lot greater than the sum of the individual impact of each application....

H - Conclusion

I urge you to reject this application. It is an unnecessary demolition of a building, adding to the carbon footprint and in complete incoherence with the green policies promoted by the Council and the mayor of London. The process run by the developers to date has not been inclusive and their lack of consultation with the local community to date is shocking. Their traffic management plans are fanciful and show a profound disregard for the local residents. Moreover the cumulative impact of this application alongside the one already submitted by the neighbouring site (2WS) is not at all addressed and it is truly baffling that the existence of another planning application on an adjacent site does not seem to have been raised / considered during the pre-application process. But there is no doubt that the cumulative impact of multiple planning applications in the same area would be large on the community members and would cause lasting damage to their physical and mental health, notably the most vulnerable of the neighbourhood, such as children and the residents of The Lodge.

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The Beauchamp Building