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**From:** james monahan [REDACTED]  
**Sent:** 30 April 2024 15:27  
**To:** Alex Kresovic  
**Cc:** [REDACTED] nt  
**Subject:** Odeon Cinema Planning Ref 2024/0993/P

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29 April 2024. By email to Camden planning

Camden Planning Department

Attention Alex Kresovic

Dear Sir

The Saville Theatre, 135-149 Shaftesbury Avenue WC2  
**Planning Application Ref 2024/0993/P**

I wish to object to the above planning application for the following reasons.

This is a listed building and has many listed elements and features still extant. The proposed development entails the complete gutting of the building internally and undertaking damaging external alterations to the listed external fabric of the building with a plethora of new openings at all levels. This is especially damaging to the St Giles Passage elevation that currently has no openings (being the rear stage wall) and as a considerable grandeur by its simplicity capped with the elegant cornice. The crude canopies to the rear of the property in New Compton Street and along Stacey Street are a further expression of the architectural illiteracy especially as exactly the same crude design is proposed to the Shaftesbury Avenue elevation. Clearly the developers see no difference to the main street elevation and the hotel entrance on the side street. The extent of demolition is completely at variance with Heritage planning policies contained in Camden's Plan.

If for no other reason the application should be refused because of the unacceptable extent of demolition of a listed building.

The proposed 10 storey 'extension' to the theatre that is proposed to be plonked on the top of the fine art deco theatre is grotesque. It is gross in height, size, scale and detailing. There is nothing that remotely complements the listed theatre building below or what will remain of it having been gutted and butchered with the 'demands' or as the applicants would say 'requirements' of a hotel use.

The concept that the height of the existing building might be doubled, that the 'extension' be so highly visible to the main street elevation and to the rear where the tranquility and placid and quiet existing elevation of the listed theatre is complemented by the community garden will be rent asunder, is remarkable for its crudity and disregard of the need to respect the scale and bulk of the existing building and not overwhelm it. The proposed gigantic block that is to be placed on top of the theatre will totally submerge the visual image of the listed building below.

The current roof to the theatre, its fly tower and roof access routes are not visible from the adjacent streets particularly from Shaftesbury Avenue and with the delicate banding and cornice at roof level the main elevations have really pleasing visual proportions and reads as a carefully designed and delicate piece of architecture that unlike its neighbours enhances the streetscape of the north side of Shaftesbury Avenue which is a major thoroughfare. By comparison the proposal overwhelms the listed buildings and will dominate the whole street and seriously damage all views from and to the conservation area and community garden to the rear.

Again all Camden's planning Heritage and Design Policies make abundantly clear that new developments affecting listed buildings and conservation areas must respect and enhance the setting of listed buildings and certainly not harm them. This scheme could not do more harm and utterly disregards the need to respect the host listed building.

The proposed use of a hotel that will dominate the proposed buildings use is not acceptable and certainly not in line with the findings of the Inspector following the planning enquiry in 2020 ( see report dated 10 March 2021 ref APP/X5210/W/19/3243781 ) that makes clear that in any future scheme the theatrical/cinema use must be the dominant activity. Clearly this is not the case with this application. The hotel use will dominate the sub- basement 'entertainment area' .

The proposed servicing for the proposed hotel in New Compton Street, which is a very quiet residential street, is entirely inappropriate and the disturbance will be highly detrimental to the amenity and quality of the residential accommodation that dominates the land use in New Compton Street and Stacey Street. The Council should enforce its planning policies of protecting the quality of resident accommodation, and certainly not encourage a use that is so intensive and large that is bound to be disruptive and be in conflict with residential amenity.

The suggestion that the harm that this development will do is somehow mitigated by the public gain that will accrue is frankly pathetic. What is driving this application is the expectation that Camden as in the past will cave in to commercial pressure for speculative gain, when in fact the existing building could be reused and repurposed as a theatrical/cinema venue with secondary uses as the Inspector recommended. It is the speculative 'hope value' that Camden Planners encourage that is the driving force behind this application. If the developers knew that Camden would apply their design and heritage policies and enforce the Inspector's recommendation then in all likelihood such an application would have never materialised, or at least the applicants would know at the outset that their scheme would not be likely to get officer's support. Camden Council are the cause of this application as they do not apply their planning and heritage policies and developers know this all too well.

The applicant relies on the draft wording on the emerging Local Plan's Opportunity Sites. ( Allocation S19 (HCG4) ).

The strength of this report planning wise is of low value not just because it is an emerging policy paper but because it is so contentious.

The current wording of Camden's site brief(S19) that is out to consultation does not acknowledge or take into account at all any the comments that have been made by the public in the past when the opportunity site descriptions were put out for consultation in 2020/21. At no time have the comments of the public been reported to committee and neither has the Inspectors report's recommendations been included in the current wording.

One of the most substantial recommendations in the Inspector's report is that the theatre/cinema use in any future renovation of the building and this should remain the dominant use of the building. This clear statement is completely airbrushed out of the current draft wording that is currently out for public consultation. The current wording talks about viability in the context of a theatre/cinema use, but viability should always be determined by what is appropriate and possible not as Camden appears to consider , viable to the developer's expectations. The developer's bottom line and profit expectations appear to be considered by Camden as of the highest priority, not how best to ensure the listed building is protected, enhanced and given an extended life as a theatre/cinema. That is precisely what the Inspector stated in the result of the Inquiry in 2020 and this prerequisite should be the basis of any design brief for the site.

The current wording also suggests that the blank facades of Stacey Street and St Giles Passage should be 'activated'. This was strongly objected to when suggested in previous draft wording for the site because as it failed to recognise the architectural significance of the so called blank facades and the need not to encourage street activities into the quiet hinterland of Shaftesbury Avenue, that is predominantly residential in use and character,

However considering the current proposals, the treatment of St Giles passage envisages five doors being inserted at street level along the full length of the building's street elevation and all the doors open outwards over the extremely narrow pavement. Three are double doors, on set that will serve an electrical substation that is required because of the overdevelopment of the site ( presumably with ventilation louvres ) , another set of double doors serving a bin storage area that will inevitably result in noise and smell and detritus on the pavement (and probably a 'cross over' to the very 'narrow pavement'), another set of double doors serving an internal fire escape staircase for the proposed hotel and two single doors serving two escape staircases to other parts of the building.

What the proposed uses are inflicting on just the east elevation which is listed, is a series of blank doors that will visually damage the elevation and clearly will not enhance the street scene.

The same can be said of Stacey Street where the proposed development requires five sets of double doors at street level, two to ventilate ductwork so clearly they will have louvres and will cause noise to emanate into what is a very quiet street, three sets of double doors to fire escapes staircases, and the final set of double doors on the corner of New Compton Street giving access to the hotel on the narrowest part of the pavement and in the most dangerous location. Again all these doors open over the pavement except the hotel doors on the corner.

Again the introduction of the proposed dominant hotel use will damage the architectural quality of the street elevation of a listed building and will seriously damage the amenity and quality of the street scene and certainly will not 'activate' the facades of the listed building.

The proposals along New Compton Street are even worse as the hotel entrance will seriously erode the quiet and peacefulness of the street and the architectural treatment endeavours to make this quite secondary street elevation into a primary street elevation.

Finally as building regulations require that all the fire escape doors must open outwards, all the doors along St Giles passage and all but one door in Stacey Street will open over the public pavement. The pavements in these two streets are narrow and are only sufficiently wide to take two pedestrians, so a door opening outwards will imply pedestrians will have to walk in the road if they manage to dodge the doors opening into their face. As this is impractical the usual 'solution' is to have these doors recessed so that when open they do not obstruct pedestrian movement, but then the recesses especially in this location will attract anti-social behaviour. So as a direct consequence of the proposed excessive increase in floor area and proposed hotel use, the requirement to provide so many fire escape doors and service doors will deaden the east, west and south street elevations, damage the substantial quality of the listed building and the street elevations along Stacey St and St Giles Passage and New Compton Street and seriously erode the quality of the quality of the pavement routes around the building.

The same level of criticism could be applied to many aspects of the application.

The overriding reason for all these objectionable features of the proposals is because the proposed development is too big, unacceptably tall , far too intensive, highly destructive, fails to respect the listed building and adjacent listed buildings, and will do unacceptable level of harm on the listed building and views to and from the conservation areas ( St Giles and Seven Dials) and for ever damage the unique and special tranquility and peace that Phoenix Gardens gives to this small quiet area of the West End.

The design of the proposed ten storey extension that will double the height of the existing theatre building is so crude and dominating that it completely submerges the fine Art Deco listed theatre.

Yours sincerely

Jim Monahan

cc. Councillors Awale, Fulbrook and Vincent