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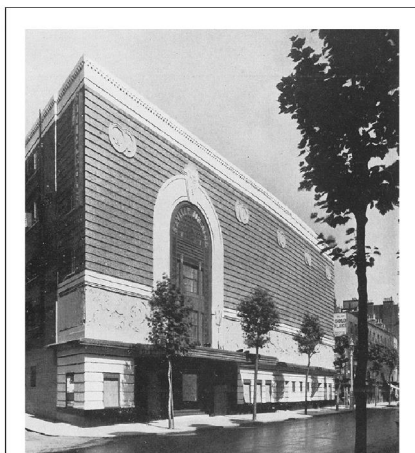
10th May 2024

Dear Alex,

[Re the former Saville Theatre, 135-149 Shaftesbury Avenue: applications 2024/0993/P & 2024/1005/L.](#)

Covent Garden Community Association objects to these applications in the strongest possible terms.

We were founded, quite famously, to fight the wholesale demolition of Covent Garden in the 1970s – a battle won against great odds. What is less well known is that at the centre of that battle was the preservation of many of the West End's theatre buildings. The widening of Shaftesbury Avenue would have destroyed The Saville, but it was stopped by those who went before us.



The Saville when it was built in 1931. Its external appearance remains remarkably unspoiled.



The battle of the early 1970s saved 16 of the West End's 38 theatres and brought demolition to a halt.

We thought that the lessons of that era had been learned. We thought that never again would precious historic buildings be reduced to rubble to make way for highways and arrogantly designed, poorer quality replacement buildings. We thought that the way forward was a conservation-led approach to sensitive refurbishment, as has happened since the 1970s in Seven Dials.

So to see this proposal 50 years later, which involves the effective demolition of the historic Saville theatre and the destruction of its character, is truly dispiriting.

It is in our view a very poor scheme, with little or no benefit that even begins to balance the numerous harms. We give a detailed rationale for our objection below.

1. Loss of primary cultural use

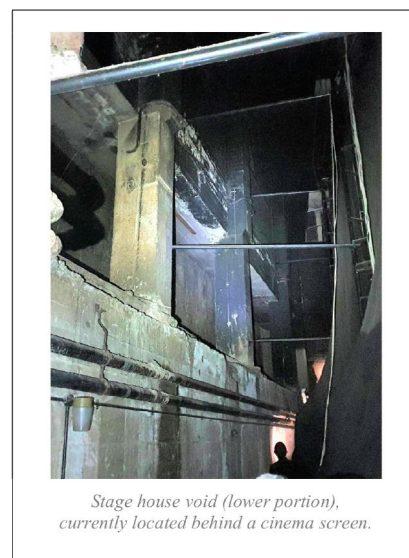
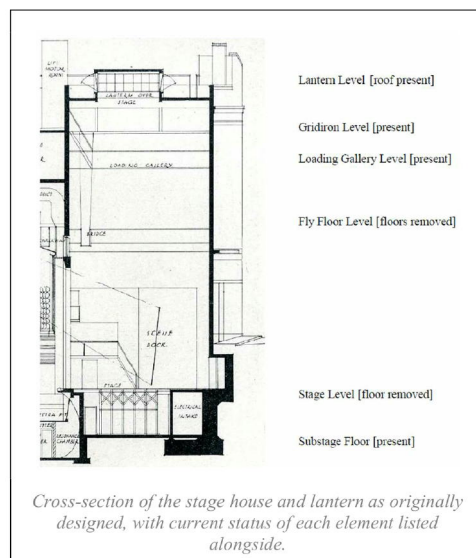
These applications cause serious harm the character of the building by removing its primary cultural use. It would no longer primarily be a place of entertainment, but yet another mid-range modern hotel with a small, expensive dinner theatre in the basement. It would lose all the internal theatre features that it still has. At the same time the local community would lose a valuable cultural facility, the only reasonably priced and accessible mainstream movie cinema in the West End.

There are two viable and attractive options that would not cause this harm and that should be considered instead, in accordance with Camden's Site Allocation (S19) for a cinema or theatre use.

1a) Reinstatement as a theatre using the original, existing back-of-house fabric

The Saville Theatre building dates from 1931. It was converted by ABC into a cinema in 1970, as were many theatres in that era. This was done quite cheaply, as was typical, with as little alteration as possible. Lining walls were erected, and we believe fabric of the original walls remains behind them.

The main cinema screen was placed in the area at the front of the stage, with the secondary screen immediately below. The full stage house remained behind them. The dressing rooms were unchanged and used as offices. This is all well documented in an assessment presented by TheatreSearch at the Planning Appeal in 2020-21, which we attach (Appendix 1).



When Odeon took over they added 2 screens, but did not build any further back. They did not touch the stage house nor the lantern, fly grid, scenery workings or dressing rooms.

We have seen inside these parts of the building, and all remain to this day. We attach a number of photographs from our site visit in 2020 (Appendix 2) to show these elements.

The 2021 Planning Appeal decision noted at paragraph 19 that “during the appeal process, the theatre fly grid was discovered via the roof lantern room...Structural elements of the original auditorium survive above the modern screens ... It is also possible to stand behind the screens in the former stage house part of the building and get a sense of the considerable height and size of this space, even with modern floors and ceilings. Remnants of former stage house floors and doors can be seen within the brickwork behind the screens.”

The building cries out for the stage house to be used once again, as part of a refurbished true West End Theatre. A theatre is, after all, why the Bayes frieze was put on the outside - to indicate what is inside.

A full feasibility study was undertaken in 2020 by CharcoalBlue, a leading theatre consultancy, which we attach (Appendix 3). This concludes that the building can be reconfigured to accommodate all modern requirements with a 1,000 seat theatre using the same roof line. The Saville sat 1,200.

At the Planning Appeal in 2020-21 a number of theatre operators and investors told us of their interest in returning the building to its original use. 9 of these gave written evidence of their position, which we attach (Appendix 4). Their interest has far from diminished.

A full-service West End theatre is a viable option. But if the building is demolished internally and built on, this exciting opportunity will be lost forever.

1b) Continuation as a mainstream cinema.

The Odeon Covent Garden is one of the group’s most successful sites in the UK, and provides 739 seats across 4 screens. Odeon would be happy to continue to operate here. They have been prevented from upgrading the building in recent years by the actions of the various freeholders who have not granted the new lease that would make investment viable.

In 2021 we discussed the situation with Odeon’s head office, who gave written evidence to the Planning appeal which we attach (Appendix 5). They were interested in continuing to operate the cinema in Shaftesbury Avenue and were prepared to invest in a refurbishment. Since Covid, the market outlook has improved, making such a proposition even more attractive now.

The Independent Cinema Office produced a report for the previous freeholder of the building, to explore how an ongoing cinema business could generate funds for the refurbishment of the building’s fabric. The preferred option was still to offer a local, low admission price cinema on this site, but in a modern and improved quality interior environment. This is ‘Option c’ in the document which we attach (Appendix 6).

This model would enable the site to continue to offer a much-needed service to the community whilst also preserving the building for future generations. There is no other low admission price cinema in the West End showing mainstream movies. At the planning appeal many local people came from across Covent Garden and Soho to give in-person evidence of how inclusive this cinema is, in an area where half the housing is in social blocks, and where many live on low incomes.

2. Serious harm to the listed building and to its context

The former Saville theatre remains one of very few examples of intact Art Deco architecture in central London. It was superficially damaged by a bomb in 1941, but narrowly escaped serious harm, and has been little touched externally since.

The applications cause serious harm to the integrity and appearance of the listed building, and its context of two conservation areas.

2a) Unnecessary and destructive façade retention scheme

The proposal is to demolish the listed building, removing the entire interior, including the stage house. It then proposes to build an 11 storey hotel behind the retained façade – essentially creating a completely new, tall building with a sliver of the old kept as window-dressing.

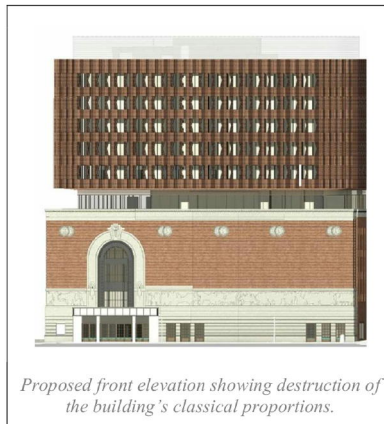
Local people are baffled by the proposal. If a developer wishes to build a hotel, why not do it on an unlisted site? Without the need to excavate additional basements, a hotel would be viable with only 6 or 7 floors rather than 11. There are plenty of buildings in the area that could be retrofitted to achieve this and not create the harms.

2b) Excessive height and mass.

The existing building is 16.9 metres high. It has perfect proportions, inspired by the those of classical architecture, as shown in the old interior murals. The building's list entry states that its architectural interest lies in "the quality of the architectural composition" and "its restrained and carefully proportioned form", noting that the form was "specifically designed to integrate the purpose-designed sculptural work by Gilbert Bayes".



The Beatles at The Saville in 1965, having received MBEs. The mural behind shows the classical inspiration for the building.



Proposed front elevation showing destruction of the building's classical proportions.

The proposal would create a new building 38.9 metres high - rising 22 metres, or 130%, above the historic façade. This would destroy the "carefully proportioned form". The height and mass would wreak havoc with the high quality "architectural composition". And it would destroy the specific design that the list entry notes as made to integrate the sculptural work by Gilbert Bayes, diminishing the sculpture's prominence in the process.

Local people have described the proposed upper extension as looking like “an alien ship plonked on top”. Quite apart from the architectural niceties, they just don’t want to have to look at it.

A previous scheme to increase the height by 9.7 metres was described in the 2021 decision by the Planning Inspector in paragraph 33 as “overly dominant” and that it would “detract from the existing form and composition”. How much more would an increase of 22 metres be overly dominant and detract from the existing form and composition.

2c) Impact on Conservation Areas

The building is nestled between two conservation areas.

Seven Dials is one of the UK’s prime conservation areas. It was among only 38 given ‘outstanding’ status in 1974 amongst many thousands of conservation areas across England. It includes the only remaining Stuart era, pre-Georgian, neighbourhood of our Capital, and is characterised by narrow streets flanked with 3-4 storey buildings. The former Saville Theatre is clearly seen from the famous Sundial pillar as one looks Northwards towards St. Giles. Views from this key point, and more closely from Shaftesbury Avenue within the conservation area, would be severely compromised by this tall building.

Denmark Street is also an important conservation area. At its heart is St Giles church, built by Henry Flitcroft in 1734. A tall building in the proposed location would dominate the skyline and harm views from the church and public churchyard, as the applicant’s own images show.



Proposed view from the centre of Seven Dials, with considerable loss of sky.



Proposed view from St. Giles churchyard and playground, dominated by the proposed new building.

3. Harm to local amenity

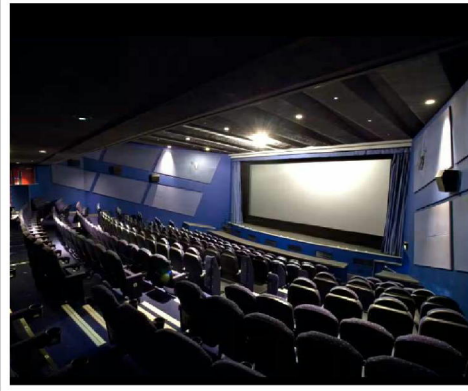
3a) Loss of a local cultural facility

The building's viability and value as a local cinema is outlined in Section 1b,) above. The proposed scheme would remove this entirely. Instead of an affordable outing that local people can take advantage of several times a month, there would be an expensive circus dinner offering, aimed at tourists, in a relatively small sub-basement. The latter is something that local people are unlikely to use often, and many not at all.

Cirque du Soleil tours large shows in major venues such as the Albert Hall. It runs smaller scale shows on a more permanent basis at several venues in Las Vegas, in Mexico and a few other places. Those in the Vidanta Riviera Maya theatre, Mexico are nearest to what is proposed for Shaftesbury Avenue, being cabaret-style with dinner. Ticket prices start at MX\$ 2,000 (£95) plus fees, without any food or drink, and rise to MX\$ 6,000 with a meal (£280). See: <https://www.vidanta.com/joya/en/index.html>.



Cirque Du Soleil dinner theatre in Mexico.



One of Odeon's 4 screens at Shaftesbury Avenue.

It is worth noting that Cirque Du Soleil has some reputation in the industry for backing out of venues, so a firm lease contract (subject to development) should in any case be shown, before this aspect of the scheme is given any serious consideration by the Local Planning Authority.

The current Odeon cinema is our community's only affordable, widely accessible mainstream cinema, with ticket prices starting at £5, or just £15 to see as much as you want for a month. If the proposed redevelopment scheme were to be implemented, where would local people go to see big movies? Some would move over to Leicester Square, with its much higher prices and lack of community feel. But many would simply not go out very much any more.

3b) Loss of privacy and night-time light pollution in homes.

Camden's Local Plan states at 3.1 that "a home should provide a place for rest, relaxation, safety, privacy and to raise a family".

There are 5 family homes with their living room windows less than 14 metres from the site. There are many more residential windows and balconies only a little further away. Ignoring Seven Dials to the South, to the quiet North of the site alone there are 134 flats across 10 nearby buildings.

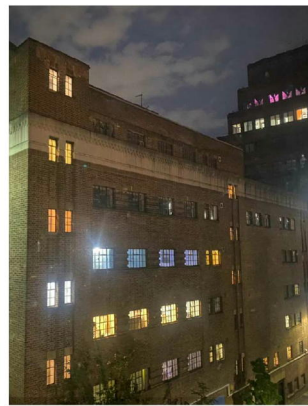
Currently the nearest homes look into windows and a blank wall at the back of the Odeon. They are windows to staircases and to old theatre dressing rooms that are either disused or used as offices, so there is currently minimal overlooking or loss of privacy, and no light at night.

The redevelopment would put hotel bedrooms behind these windows, add windows to the blank wall, and add 6 floors of much larger windows directly overlooking the flats. Privacy would become non-existent for the families here. This in opposition to the application of Camden's Local Plan Policy A1 in the SPG on Amenity chapter 2 (Overlooking, privacy and outlook).

There would also be 24/7 illumination from the common parts and the proposed 5th floor lobby, as well as high levels of illumination from several floors of bedrooms in the evenings and variably all night.



Typical view from living room of family flat at Pendrell House. The Odeon is 14 metres away, with windows to a back staircase and offices.



A view in the evening, showing little light spill in comparison with 6 widely glazed additional storeys bearing down from above. There is no light at night.

It is not clear whether any of the terraces at 5th, 9th and 10th floor levels are accessible for guest or staff recreational use. If they are then this would be an additional concern, both in relation to privacy and noise nuisance.

3c) Loss of daylight to homes.

The applicant's Daylight & Sunlight Assessment seems determined to downplay some serious results. In the past the council would undertake its own assessment and report in an objective way. It is regrettable that the applicant's report is not so objective. It is also regrettable that effort was not made to obtain reliable floorplans from the owners of the closest buildings.

What is clear is that the development would have a serious effect on daylight in the homes of families living behind it - in Phoenix Street, Stacey Street and New Compton Street. The extra storeys would bring a noticeable reduction in the Vertical Sky Component (VSC) ratio in many rooms, some seeing alterations over 40%. They would also reduce the No-Sky Line (NSL) measure of daylight distribution in many rooms, some again seeing alterations of 40%.

Those behind balconies or near caves are dismissed as being the fault of the neighbours' own building designs, but the large reduction will nevertheless be the residents' lived experience. And even when these features are factored-out, reductions continue to exceed the 20% guideline.

NSL reductions in bedrooms are likewise dismissed, taking no account of the fact that many of these are now used by residents working from home – arguably now needing more daylight than other uses.

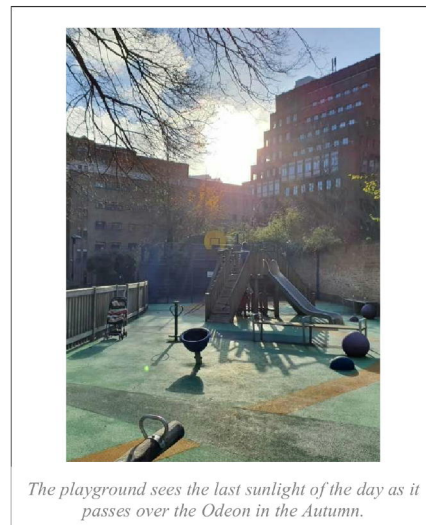
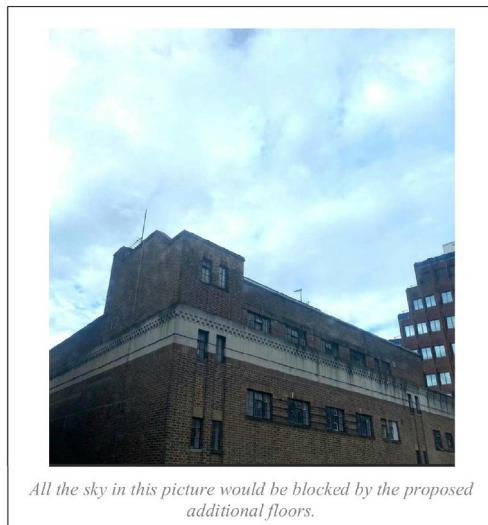
3d) Loss of sunlight to communal garden and children's playground

The Phoenix Garden is the last community garden left in the centre of London. It is a precious oasis to many hundreds of people who live and work here, and who use it regularly to connect with nature and restore their mental health.

St. Giles Churchyard adjoins it, which is an important location for small-scale recreation, worker breaks, and the place where people meet to walk their dogs from across the West End at various times of day.

St. Giles Playground is a crucial amenity for families in the area, none of whom have private gardens attached to their homes. We are already experiencing reductions in school rolls, and families with children leaving the area because of a less child-friendly environment that has started to prioritise later night leisure activities and is failing to enforce against antisocial behaviour. The playground is a very important part of trying to balance this.

Phoenix Garden and St. Giles Playground would both be particularly affected by the proposed tall building. Again, the applicant's Daylight & Sunlight Assessment seems determined to downplay the impact by focussing only on the mean-spirited measure of 2 hours of sunlight per day to half of each space in March.

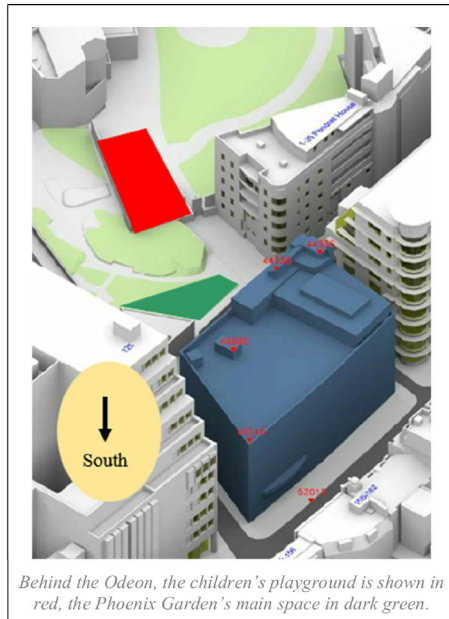


No absolute measures have been presented of how much sunlight these spaces get now, and how much they will get if this tall building is placed just to the South of them. In reality we believe that both these spaces will lose an immense amount of their existing sunlight even if they still get 2 hours of it.

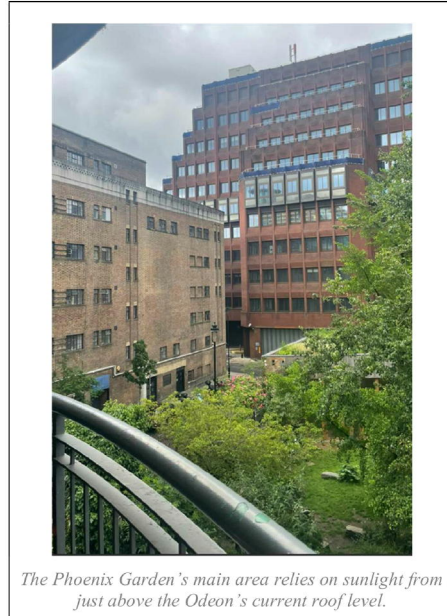
Aren't the children of Covent Garden worth more than this?

Even by the awful "2 hours" measure, all Phoenix Garden's social space would become shaded. This is the main part of the garden, in front of the pavilion building, and the garden's only grassed, open area.

The serious harm is masked by the claim in the Assessment that the garden as a whole would have the portion that receives less than 2 hours of sunlight reduced by ‘only’ 33.8%. But this affected portion includes the entirety of the main area, which will no longer receive even as much as 2 hours sunlight in March.



Behind the Odeon, the children's playground is shown in red, the Phoenix Garden's main space in dark green.



The Phoenix Garden's main area relies on sunlight from just above the Odeon's current roof level.

In addition to the dismal user experience, this level of shade would allow very few varieties of plants to grow, in what is already a challenging space. It would be in direct opposition to Camden's local plan Policy A3 and the London Plan Policy G6 on Biodiversity and access to nature. Phoenix Garden is designated as a Site of Local Importance for Nature Conservation. It contains trees and currently some flowering plants, and attracts many different animal species including bees, birds and butterflies along with bats and other mammals. The most significant impact of the reduction in ‘Sun on the Ground’ hours would be on invertebrates that inhabit the garden, particularly more than 10 observed species of bees.

This proposal cannot be said to accord with Camden's Local Plan more generally. It states at 1.30 that “We need to make sure that the growth and change respects the character, heritage and distinctiveness of Camden's valued and special places”. And Policy A2 (Open space) states at A2c that the Local Authority will “resist development which would be detrimental to the setting of designated open spaces”.

3e) Nuisance from servicing

The servicing requirements of the proposed hotel and dining uses are vastly greater than that of cinema or conventional live theatre use. We have experience of the impact of servicing both types of use in the West End. Except when shows change over, servicing to a live theatre is minimal, often involving only a few deliveries of supplies each week and simple refuse collection. Similarly, the Odeon currently has 3 deliveries per week plus a couple of refuse collections.

However, servicing hotels & restaurants involves multiple deliveries every single day, and collection of several different waste streams, often at anti-social hours. The applicant estimates 20 servicing & delivery trips per day, 7 days a week, from 8am to 8pm. At 15 minutes on average, this amounts to up to 5 hours of servicing and deliveries per day.

All this loading and unloading is proposed to take place in what are currently residents' parking bays behind the site, in New Compton Street which is currently a relatively quiet backwater. This will have serious impact on the tranquillity of Phoenix Garden directly opposite only a few metres away, and on the residents living above in Pendrell House.

The loss of residents' parking bays is also a serious matter for local people. Although most people no longer have cars in this area, some families still need one. Some people are required to drive for work, and others struggle on public transport. Since the pandemic a large number of bays have been lost because of traffic changes and al fresco dining. Residents cannot find any spaces on some days, and have to park a long way away or even pay for a car park. This is very difficult for those who have children and for our older residents. We object to any proposal that would reduce the supply of residents' parking bays further.

3f) Distress and health impact caused by works

Removal of the building's back wall, complete internal demolition and the excavation of two additional basements will all be unbearably noisy for a very long time. There are also proposed to be 30 vehicles a day moving about during construction. We are unable to think of mitigations that would prevent serious distress to neighbouring residents from this intensity of building works over a 3 year period. A more modest scheme would not cause this harm.

The area behind the site is densely residential. Many families with children live here. People work from home, people have children who need to revise for exams, some people are ill and housebound. Their lives and mental health will be severely affected.

Although this is not in itself a reason for refusing the application, we believe that it should be taken into account, and serious weight given to the level of harm to human rights that the works will cause over a prolonged 3 year period.

4. Environmental harm

4a) Carbon-heavy development

The extensive demolition required by this scheme would be contrary to the principles of sustainability laid down in Camden's policies, the London Plan and the NPPF - especially when there are alternative ways to use the site that do not have such negative environmental impact. The alternatives carry equivalent or better benefits, and cause less harm.

Camden's Local Plan contains strong policies in CC1 and CC2 that prioritise altering or retrofitting, and allow demolition only where it is not possible to retain and improve a building.

The London Plan hierarchy for building approaches works through from refurbishment and re-use to the least preferable option of recycling materials produced by the building or demolition process.

The NPPF emphasises in Chapter 14 at paragraph 152 that "The planning system should support the transition to a low carbon future ... It should help to shape places in ways that contribute to radical

reductions in greenhouse gas emissions” and “encourage the reuse of existing resources, including the conversion of existing buildings”.

The applicant’s Circular Economy statement has little vision. It proposes to use some of the demolished materials “to form crush for the new concrete required for the new structural elements to increase circularity and reduce waste generated” (page 11), which hardly competes with a conservation-led approach. It is not clear whether this accords with Camden’s Local Plan at 8.17 which states that “proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer’s Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.”

The applicant’s Circular Economy statement also states at page 13 that “The biggest opportunity for this project ... is consideration of flexible use of the above ground spaces; currently proposed as hotel use type”, which has not been done.

We stress that this building has the same problems as many other buildings that have been successfully retained and improved, such as the Cambridge Theatre at Seven Dials which was treated for cracking and a similar situation with the stonework in 2016. It is perfectly possible to make a moderate investment in such refurbishment for the former Saville Theatre, and to evolve a scheme that requires significantly less demolition.

4b) Damage to nature from works

Camden’s Local Plan Policy A3 Biodiversity acknowledges at 6.73 that “the demolition and construction process can pose a significant risk to habitats and species” and we believe this to be the case here.

More than 3 years of noise and vibration within about 10 metres of the Phoenix Garden could hardly fail to cause significant problems to the habitats and species discusses in 3d), above. Yet it has not been addressed in the applicant’s Construction Management Plan.

5. Safety issues

We have identified some risks to safety in the current proposals.

5a) Fire access risk

We are very concerned that access to such a high building, constrained by narrow streets on 3 sides, will be inadequate.

The Building Safety Act 2022 was the government’s first attempt to protect against tragedies like Grenfell, and sets out initial criteria for buildings “at higher risk”. If this development were to go ahead it would be likely to be included, as we have been advised that the criteria will be expanded in the near future to include anywhere that people sleep, like a hotel.

5b) Danger to pedestrians, and reduced community safety due to drug crime.

The application is accompanied by a Crime Impact Assessment. We are very surprised that there is no mention of the fact that New Compton Street is well-known drug dealing and using hotspot, including the area immediately behind the site. We are therefore doubtful about the document’s statement in Section 2.2 that “The immediate area surrounding the development has been assessed for Crime, Terrorism and any

identifiable active groups that may threaten the project directly or general activities that form the ambient safety and security conditions of the local environment”.

The rear of the existing building has a number of recessed fire doorways that currently offer good cover for drug users. The proposed development has fire exits, but these open outwards and across the pavement. Our understanding is that, whilst fire escape doors must be outward opening, they are not permitted to open across a pavement accessible to the public in case the opening of a door causes injury to a passerby. An alternative is sometimes to put barriers on either side of the fire exit on the pavement, but in this case it would be narrowed too significantly. If the fire exit doors are redesigned to be recessed, then a solution must be found to prevent them being used by drug users.

It seems likely that a consequence of the development is that the area immediately behind would no longer be as attractive to drug users and dealers. This is likely to displace activity further East along New Compton Street, nearer to residents, so increasing issues already being experienced. Any development should mitigate this impact by paying a contribution to install new public realm CCTV cameras on Camden’s network, located to the East along New Compton Street.

5c) Subsidence and/or ground water issues

Notwithstanding the applicant’s Basement Impact Assessment and Flood Risk Assessment, we have had instances of subsidence in the past within 10 metres of the Odeon, with the pavement collapsing on New Compton Street. Our clear concern is that disturbing the ground in the dramatic way proposed, to dig down 16.5 metres, could have a dangerous impact on surrounding buildings.

The Basement Impact Assessment at page 14 states that the nearest surface water feature is located 786 m to the South East. Flood Risk Assessment at page 6 states that the nearest watercourse, the River Thames, is found approximately 850m to the south of the site. We are not sure how to resolve these statements. However, we understand that there may be ancient surface water features and water courses far closer to the site. For example, William Newton’s 19th century retrospective 16th century map shows streams and surface water pools in Cock & Pye Fields, and on the South East edge of St. Giles Fields which is now this section of Shaftesbury Avenue.

A related issue is that more than 200 bathrooms are proposed to be added to the site. The impact on local drainage and sewers is not addressed at all in the applicant’s Sustainable Urban Drainage Report.

6. Rebuttal of applicant’s claimed benefits

The applicant has come up with very few benefits to even begin to balance the long list of harms. Some are mentioned in the application documents, some in other literature that they have circulated. We take each in turn.

6a) Secondary theatre use (bringing net harm)

The Saville Theatre was a 1,200 seat full-service West End theatre. As discussed in 1a), above, a viable option for the building would be to reinstate this with a slight reduction to 1,000 seats to comply with modern requirements.

The scheme instead puts a small dinner theatre in the basement of a hotel development. The auditorium would have a flexible arrangement with up to 400 seats / covers. The hotel would occupy c. 6,000 square metres and the theatre and restaurant and bar would occupy c. 2,000 square metres.

This idea does not come anywhere near to satisfying the Site Allocation (s19) policy HCG4 which states that “The site is allocated for cinema or theatre use. Provision of other uses ... are considered acceptable provided that these are secondary uses within a mixed-use scheme with a cultural facility as the predominant use”.

The scheme also fails to take account of the Planning Appeal judgment, which states at paragraph 39 that “harm would be considerable given the fundamental change from a single cinema/theatre use across the building to a mixed use scheme where hotel and restaurant dominate, and the loss of important surviving features. The ability to understand the significance of the building would be very much reduced due to the extent of changes”.

The proposal therefore causes net harm, not net benefit, because it replaces a valued and inexpensive local cultural facility of over 700 seats with an expensive tourist facility of up to 400 seats.

6b) Refurbishment of fabric (bringing net harm)

The applicant’s Facade Condition Survey states at 2.7.1 that the Bayes frieze “has been sculpted and manufactured to a very high standard and is generally in good condition. The frieze is a cast artificial stone designed to simulate natural Portland stone. It has proved to be very durable with minimal surface decay”.

However, it also points out cracks in the roundels and brickwork. And it suggests that the exterior walls are suffering in parts from ‘Regent’s Street Disease’, as with many early 20th century buildings where corrosion of the steel frame has affected brick and Portland stone facades.

The state of the building is not serious. Any new tenant would be looking to put these things right. Indeed, Odeon group has for some time been seeking a new lease that would allow them to make this investment. What is different with this proposal is that it only invests in the refurbishment at the expense of complete demolition of all the other fabric. We do not think that it is a complex calculation to work out that the result is one of net harm.

6c) Discounted tickets for local people (bringing net harm)

We asked the applicant this month what was envisaged in this regard and they said that this would need to be worked out with the operator. We have no faith that this will result in a meaningful offering for those on low incomes.

We have confirmed with the applicant that there would probably be one or two shows a year. Even if local people are given affordable tickets for these could afford it hardly compares with the option of several new movies a month for £15 a month.

Again, the result is net harm, not benefit.

6d) Hotel lounge workspace (bringing marginal benefit)

Oh dear. The applicant really is clutching at straws here. It’s difficult to take this offer seriously.

Does the applicant have any idea of how many hotel foyers are available to our residents in the immediate area? They can even work in the splendour of the public spaces of the Royal Opera House if they so choose. Again, sadly, there is little benefit here.

6e) Engagement & Partnerships (bringing marginal local benefit)

The applicant claims that their theatre tenant will organise programmes of engagement with young people and schools, performances in hospitals and schools, and partnerships with schools to upskill teachers and educational providers. But there is no commitment from the tenant to this.

However, even if there were to be a commitment, we have seen too many cases of such promises coming to nothing in the past – for example with the Hospital Club in Endell Street that has now closed. The applicant in that case divided the community because some families saw opportunities for their children that never materialised.

It should be noted that offerings such as this are, in any case, now available from other companies and theatres in the area. So unfortunately, while attractive, they would not bring great additional benefit locally even if they did happen.

6f) Economic spin-offs (similar benefit to predominantly theatre use)

The applicant says that the development will create 125 permanent full time jobs, add £12.6m Gross Annual Value within the Greater London Economy, and create up to £23m linked trip spend by theatre goers per annum.

Firstly, it should not be forgotten that the current Odeon is one of the busiest cinemas in the country; we would like to see the comparison with the economic benefits that it already brings in order to quantify and real net benefit.

Secondly, these benefits would be brought about by redeveloping the building for predominantly theatre use, too, whilst causing far less harm. A theatre with 1,000 seats, plus a new restaurant, would bring in more people each day than a 400 person dinner theatre and a 200 room hotel. There would be a reduction in unskilled jobs in comparison with an 11 storey hotel, but these types of job are problematic for the West End due to lack of local worker availability and pressure on infrastructure.

7. Rebuttal of some comments in support

After the expiry of the initial consultation, at the end of April 2024, the applicant told us that they saw large number of local objections to the scheme on Camden's planning portal. They then asked their associates to submit quick comments in support of the scheme using a button on their website.

Local people had taken a long time to consider and submit comments that reflected the direct impact on them and their families, as well as the conservation areas and the building itself.

Conversely, most of the supportive comments do not seem to be local. And they are generally very short, some being only one word! Those that go into a little more detail give their reasons chosen from those listed on the developer's website; they mainly relate to bringing theatre use back to the building, and creating jobs, which we have discussed in section 6, above.

Some of the comments also refer to making the area more lively, which makes us wonder whether they mean that the West End isn't lively, or whether they mean that the area behind the Odeon should no longer be allowed to be a tranquil haven from that liveliness! They do not seem to be comments made with local knowledge, as Covent Garden and Soho have been heaving ever since the Elizabeth line was opened.

The key thing that we take away from this is that all the sound reasons given in support of this scheme would also be reasons for supporting the building being brought back to predominantly theatre use.

8. Conclusion

We ask you to recommend these applications for refusal due to the many serious harms that would be caused, as listed above, whilst bringing very little benefit.

We look forward to a more hopeful future for this beautiful, unspoiled gem of a historic building.

Yours sincerely,

Amanda Rigby

