

From: BRAG

Sent: 20 December 2024 18:08

To: David Fowler; Planning

Subject: 2024/4662/P - One Museum Street; variation of planning approval 2023/2510/P

Dear David

BRAG fully supports the well-researched and argued objections to this application from residents who live close to the One Museum Street development site, as they know **from experience** how the local streets work in terms of servicing and deliveries. It is crucial that Camden officers listen and understand the potential difficulties from those who live nearby. It is not possible to make decisions that involve deliveries and servicing from a desktop mapping study of streets and generalised data.

We recall that the issue of deliveries and servicing was only minimally discussed at the end of the very long Planning Committee debate on whether the One Museum Street development should be given planning permission, which took place on 16th November 2023.

David Kaner, of the Covent Garden Community Association, spoke eloquently about the need to design in sufficient loading space at the start of the project. *“If you don't have enough capacity, and / or too much demand for the capacity, vehicles will be on the street. That's what happens at Centre Point. It'll just get repeated here and there isn't room for that to do it safely.”*

The Chair of the Planning Committee pointed out to Members that there will be a Servicing Management Plan and the issue was virtually ignored at the time.

Section 73 provides a procedure for conditions within an existing planning permission to be modified or removed. But in this case the modification does not appear to solve the difficulties of delivery and servicing that were inherent in the original planning application. And, as we know, they were not properly debated at the Committee meeting stage.

The current application [2024/4662/P] does focus on delivery and servicing and it is vital that decision-making is therefore done by the whole Planning Committee, not just through delegation.

It seems that changes are being made to try to fit the servicing operation into the original building design, by making additional use of surrounding public space for lorry parking, without really knowing whether this will actually work in practice.

There is also the issue of residential amenity, a key element of Camden policy when deliberating planning decisions. Despite the perception that nobody lives in central London, many people actually do. The demolition and building process at One Museum Street will cause residents undue stress and anxiety during the years of construction. To then suffer in the future from the poor design of a servicing and delivery plan will add insult to injury. Now is the time to get this right.

The servicing needs of a tall office block, combined with adjacent residential and mixed use units will require careful attention, otherwise the nuisance for people living nearby will be unacceptable in practice.

How will one turntable lift and a single ground floor level bay actually manage to handle all deliveries and waste collection? People living in the new accommodation [as well as existing local residents] will not favour activity from 7.00 am until 10.00 pm. That will generate a lot of noise.

We note that the latest proposal has dispensed with the unified collection point for the commercial uses and now suggests that all retail units, including large restaurant and entertainment facilities, are to leave their refuse in plastic bags on the street. Is this really a viable resolution to the servicing issue? Surely a properly designed building on this scale would have already "designed in" the necessary solution. If not, why not?

The environmental consequences of these proposed arrangements will also have a negative impact on anyone using the adjoining streets which is completely at odds with the intention to attract more people to the ground floor commercial outlets and to make the area a place where people will want to walk on foot, as per Camden's liveable neighbourhood aspirations.

We also note that the affordable workspace has been reduced from 186 sqm to 137 sqm which is a reduction of 49 sqm. It is suggested that the offer of 30% for the working hours are now offered for free (an extra 10%). But if the space to use is too small to be useful in practice, then the fact it may be "free" is irrelevant.

There seem to be a large number of changes in this "modified" application. Is it really acceptable in planning terms? It must certainly be discussed by the whole planning committee and not simply rushed through with a nod out of expediency - and the fact this has been a contentious development proposal from the start.

We would like to remind decision-makers that this proposal affects a street which leads people from Holborn and Covent Garden to the world famous British Museum in Bloomsbury. According to Google Bloomsbury is "considered a fashionable residential area, and is the location of numerous cultural, intellectual, and educational institutions." Unless the servicing arrangements for One Museum Street actually "work in practice", there will be increased traffic problems, additional pollution and black bags of rubbish scavenged by seagulls and rats with rubbish blowing in the wind. Is this the image of Bloomsbury that Camden really wants to promote?

The Bloomsbury Residents Action Group objects to the application and its revision of the delivery and servicing arrangements, we do not consider the changes 'minimal', and consider that a much better solution should be proposed. It is far better to go back to the drawing board now, take on board the experience of local residents and make sure that what is designed actually works in practice.

Debbie Radcliffe

for Bloomsbury Residents Action Group (BRAG)