

Mr Ewan Campbell
London Borough of Camden
Development Management
Camden Town Hall
Judd Street
WC1H 9JE

Date: 31 January 2025
Our ref: 64743/06/SSL/THu/33416095v1

Dear Ewan

Objection to Planning Application ref.2024/5501/P at 100 New Oxford Street, London, WC1A 1HB

This letter has been prepared by Lichfields, on behalf of our client '100 NOX S.à r.l.', and is submitted to the London Borough of Camden Council ('the LPA') in objection to a planning application seeking full planning permission for the proposed installation of a telecommunications base station comprising the *'Installation of 6 no. antennas, 2 no. transmission dishes, 1 no. equipment cabinet, 3 no. flat pack frames and ancillary development including Remote Radio Units (RRUs) and GPS module'* (ref. 2024/5501/P) on the rooftop of 100 New Oxford Street, London, WC1A 1HB ('the Site' which encompasses the existing Prospect House building listed as Nos. 78-116).

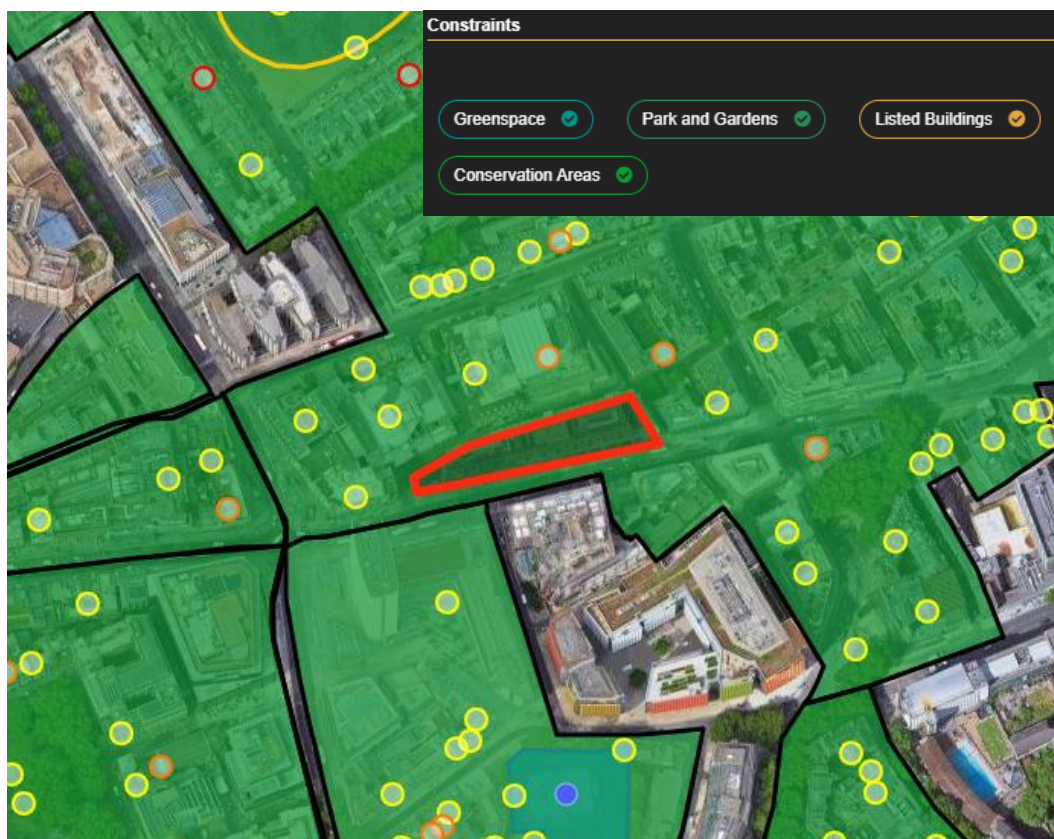
Our client, who owns the building, wishes to register their strong objection to the proposal on the grounds that it conflicts with local and national planning policy and harms the character and appearance of the Bloomsbury Conservation Area and Congress House (Grade II listed building). Further uncertainty is anticipated due to the lack of cohesive progress on the split-cell solution, which is expected to lead to future proliferation of equipment at this location, if any associated applications at Albion House are unsuccessful (see further details below).

Site Context

The Site is located within the Bloomsbury Conservation Area ('Bloomsbury CA'), and adjacent to Denmark Street Conservation Area ('Denmark Street CA') which abuts New Oxford Street at Earnshaw Street. It is notable that Castlewood House (where telecommunication apparatus was previously installed) and Central St Giles (one of the replacement cell sites already in operation), both fall outwith any conservation area. The existing building at 100 New Oxford Street is an early 20th century commercial building of neo-classical symmetrical composition with modern retail units at ground floor level. The building is of high quality, with attractive stone detailing, including a central bay with Corinthian columns. The large scale of the building, five storeys with two additional mansard levels is appropriate for its surroundings. It is identified as a "Positive Building" in the Bloomsbury Conservation Area Appraisal and is, therefore, a 'non-designated' heritage asset.

There are numerous heritage assets within the vicinity of 100 New Oxford Street, as set out below and in Figure 1.

Figure 1 Map of nearby listed buildings – site outlined in red for ease of reference



Source: Landstack (2025)

The proposed equipment is located within close proximity to the following listed buildings/structures:

- Burton's Headquarters and Shop, Grade: II (Listing ID: 1379031);
- Dominion Theatre, Grade: II (Listing ID: 1379033);
- Queen Mary Hall and Ywca Central Club and Attached Railings, Grade: II (Listing ID: 1113221);
- Congress House Including Forecourt and Courtyard Sculptures, Grade II* (Listing ID: 1113223);
- Parnell House, Grade: II* (Listing ID: 1378865);
- 1, 3 and 5, Bloomsbury Street, Grade: II (Listing ID: 1244459); and
- Centre Point, Grade: II (Listing ID: 1113172).

The Site has previously been subject to a planning permission for telecommunicates equipment, granted on 26th January 2022 (ref. 2021/2315/P), but crucially this was not implemented within the requisite 3-year period. As such, the site does not benefit from an extant permission and this latest application must be determined on its own merits.

Policy Context

Section 70(2) of the Town and Country Planning Act 1990 states that where an application is made to a local planning authority for planning permission, the authority shall have regard to the provisions of the development plan so far as material to the application. The statutory development plan in this instance comprises the London Plan (2021) and Camden Local Plan (2017).

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise, including the National Planning Policy Framework (NPPF).

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to have “*special attention to the desirability of preserving or enhancing the character or appearance of the area*” (Section 72). When considering whether to grant planning permission for a development which affects a listed buildings or its setting, Section 66(1) requires the local planning authority to have special regard to the desirability of preserving the listed building or its setting or any special features of special architectural or historic interest which it possesses. This is a duty which the Courts have confirmed should be afforded special weight over and above other material considerations.

In this respect, it is considered that the application has plainly not accounted for or assessed impacts arising from a heritage perspective, and in turn, the harm that will arise to the character, appearance and significance of Bloomsbury Conservation Area, and the setting and significance of nearby listed buildings, including Congress House (Grade II*).

Camden Local Plan

Policies D1 and D2 of the Camden Local Plan detail the Council’s commitment to securing high quality design and the preservation of the historic environment. Policy D1 sets out the design requirements for the developments, of which the most relevant to this application are:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- m. preserves strategic and local views;
- o. carefully integrates building services equipment

Policy D1 also states that “*the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*”.

Policy D2 relates to heritage assets and their settings. The policy requires that ‘development within conservation areas preserves or, where possible, enhances the character or appearance of the area’. The policy also states “*the Council will... resist development that would cause harm to significance of a listed building through an effect on its setting*”.

The Council's Planning Guidance: Design SPD – Section 9, also requires that the proposed equipment will:

- Not harm occupants or neighbour amenity health or wellbeing;
- Be incorporated into the building aesthetically;
- Have a minimal impact on the environment; and
- Not harm any listed buildings, conservation areas or streetscapes.

London Plan (2021)

London Plan Policy HC1 (Heritage Conservation and Growth) acknowledges the importance of London's historic environment. Criterion C states that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process”*.

It is accepted that the London Plan acknowledges the importance of digital connectivity infrastructure. In terms of mobile digital infrastructure and connectivity, Policy SI 6 states that development proposals should meet the expected demand for mobile connectivity generated by the development (2); take appropriate measures to avoid reducing mobile connectivity in surrounding areas (3) and, support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well designed and suitably located mobile digital infrastructure (4). Development plans should support delivery of digital infrastructure, particularly where areas suffer from gaps in connectivity and barriers to digital access.

National Planning Policy Framework (2024)

At the heart of the NPPF is a *‘presumption in favour of sustainable development’*. Achieving sustainable development means that the planning system has three overarching objectives: economic, social, and environmental. These aims are interdependent and need to be pursued in mutually supportive ways.

Paragraphs 119 – 123 of the NPPF relate to the development of communications infrastructure and consideration of potential impacts, highlighting the use of and redevelopment of existing sites, together with the need to ensure planning decisions are determined on planning grounds only.

Paragraph 120 gives weight to the utilisation of existing telecoms sites, stating that *‘The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate’*.

Section 16 of the NPPF considers conserving and enhancing the historic environment. First of all, Paragraph 202 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Local planning authorities require the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (paragraph 200). Paragraph 208 goes on to state that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*

Paragraph 210 requires local planning authorities in determining applications to take account of:

- a the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c the desirability of new development making a positive contribution to local character and distinctiveness.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (paragraph 212). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (paragraph 215).

Paragraph 216 requires the effect of an application on the significance of a non-designated heritage asset to be taken into account when determining the application. This is important given the status of the host building.

Paragraph 219 requires local planning authorities to look for opportunities for new development within conservation areas, and with the setting of heritage assets, to enhance or better reveal their significance.

Development Proposal

It is understood that the need for the telecommunicates equipment at the Site has arisen due to the decommissioning of an existing base station at Castlewood House (77-91 New Oxford Street), due to redevelopment, which commenced in circa 2020. In order to replace and improve the coverage and capacity of the previous base station, a split-cell solution is being sought by the operator across 3 separate sites in the immediate area. This application is for one of those sites.

This proposal seeks to erect telecommunications apparatus (6 no. antennas, 2 no. transmission dishes, 1 no. equipment cabinet, 3 no. flat pack frames and ancillary development including Remote Radio Units

(RRUs) and GPS module), which would stand 6.1 metres clear of the current roof level. The proposed materials comprise galvanised steel and steel, which is not sympathetic to the surrounding area.

This application is referred to by the applicant as a ‘resubmission’ of the previously permitted application at the site (ref. 2021/2315/P) and one which closely resembles the previously approved scheme. The key change is the relocation of the antenna on the west elevation towards the outer edge of the plant room, from the opposite side (see Figure 2). Given this will increase the prominence of the equipment from street level along New Oxford Street, we consider this to be a material change, and one which has potential to cause greater impact on the historic environment. In fact, the photomontages accompanying this 2024 application have not been updated from the previous application which is a serious shortcoming, and Image 2b shows the antenna being partially concealed by the existing plant room (Figure 3). This is no longer the case and the inclusion of the out-dated photomontage document, is a significant omission.

Figure 2 Side-by-side comparison of approved and proposed elevational plans (south elevation)

Approved plans (ref. 2021/2315/P)



PROPOSED SOUTH ELEVATION

Proposed Plans



PROPOSED SOUTH ELEVATION

Source: Documents uploaded to planning application

Figure 3 Extract from photomontage pack demonstrating that the visualisations have not been updated



Image 2a
Existing view from the junction of Tottenham Court Road and New Oxford Street, looking East.



Image 2b
Proposed view from the junction of Tottenham Court Road and New Oxford Street, looking East.

Source: Photomontage pack submitted to planning application ref. 2024/5501/P

Heritage Assessment

Firstly, the applicant has not submitted a standalone Heritage Impact Assessment to consider the impact and harm arising from the proposed development on heritage assets. This is a national policy requirement for proposals with the potential to affect the significance of heritage assets. This is a fundamental omission which should prevent the application from progressing any further, or alternatively lead officers to refusal given it prevents a full assessment from being carried out, and a decision reached via the planning balance. To assist officers, we have undertaken our own assessment, as set out below.

The proposed telecommunications equipment would be located at roof level of 100 New Oxford Street, an early 20th century commercial building of neo-classical symmetrical composition with modern retail units at ground floor level. The building is of high quality, with attractive stone detailing, including a central bay with Corinthian columns. The large scale of the building, five storeys with two additional mansard levels is appropriate for its surroundings. It is identified as a “Positive Building” in the Bloomsbury Conservation Area Appraisal and is therefore a non-designated heritage asset which would be directly affected, as per NPPF para. 216.

Due to the scale of the building, including the plant rooms at roof level, the proposed telecommunications equipment would have a high visual influence in the surrounding townscape.

Figure 4 Photograph taken from outside Tottenham Court Road Station. Burtons Headquarters and Shop, and Centre Point are located on the left and right sides of the image respectively (both Grade II listed). Rooftop identified in red for ease of reference.



Source: Lichfields (2025)

The equipment would rise to 6.1 meters above roof level and would be highly prominent in its immediate surroundings. The host building is located within the Bloomsbury Conservation Area and is adjacent to the Denmark Road Conservation Area. There are a number of listed buildings within close proximity on New Oxford Street, including 1, 3 and 5 Bloomsbury Street, Centre Point, Burtons Headquarters and Shop (all Grade II listed), as well as Parnell House and Congress House (both Grade II* listed) to the north. The existing building forms part of the setting of these buildings, and these designated heritage assets all hold special architectural and historic interest.

On approaching the building from the west, Burtons Headquarters and Shop and Centre Point comprise the foreground with the host building (a positive contributor) forming the backdrop. In views from here (such as Figure 4), the proposed antenna would draw the eye away from the host building and the listed buildings referenced above. In particular, in this viewpoint, the traditional façades of the host building and the Burtons Headquarters present as ‘solid’ with stone materiality. The proposed antenna would appear as an incongruous addition to the roofscape which would not accord with the character of these buildings, causing a degree of harm to their respective settings, and to the character and appearance of the Bloomsbury Conservation Area.

From within the Denmark Street Conservation Area, alongside the elevation of Centre Point fronting Earnshaw Street, the proposed antennas would be highly visible (Figure 5). It is accepted that some

plant louvres are already visible on the roof the host building, but the proposed antenna would protrude out from the solid massing that exists currently and would plainly look out of place, again incongruous with the roovescape. This would detract from the setting of Centre Point.

The proposal would detract from the setting of the Denmark Street Conservation Area, as illustrated by Figures 4 and 5, and the viewpoints submitted by the applicant.

Figure 5 Photograph taken from Earnshaw Street. Centre point is visible on the left side. The proposal roof is outlined in red for reference.



Source: Lichfields (2025)

From the north, the proposed antenna would be visible in some key views. A visualisation of one of these views was provided by the applicant – the antenna would be highly visible from this Dyott Street location (Figure 6). In the right side of this view is the Grade II* listed Congress House. The antenna would harm the setting of this building. The height and form of the new element would draw the eye away from the interesting façade of Congress House. This would cause a degree of harm to significance of the building.

There is a similar effect on Grade II* listed Parnell House (on the left side of the image in Figure 6). However, the impact on Parnell House cannot be fully considered from this viewpoint alone, as there would also be a visual effect from Streatham Street (Figure 7). It is also clear from this viewpoint that there would be an impact on the setting of 1, 3 and 5 Bloomsbury Street, which is visible on the left side of the photograph.

Figure 6 Photograph taken from the north end of Dyott Street. The proposal roof top is outlined in red for reference.



Source: Lichfields (2025)

Figure 7 Photograph taken from Streatham Street. Proposal roof is outlined in red for reference.



Source: Lichfields (2025)

In respect of external telecommunications equipment, the Bloomsbury Conservation Area Appraisal and Management Strategy states:

“Prominent external telecommunications apparatus, including cable runs, can harm the appearance of an historic building. Efforts should be made to find discrete solutions appropriate to the character of the area.”

This point is also made in the Denmark Street Conservation Area Appraisal and Management Strategy.

Whilst some visualisations have been provided with the application, this key view from Streatham Street has not been included.

Introducing telecommunication equipment on an existing prominent building, itself a positive contributor and non-designated heritage asset, within the setting of other historic assets and within the heart of the conservation area would have an unacceptable harmful impact on the significance of the various listed buildings and the character and appearance of the Bloomsbury and Denmark Street Conservation Areas. The proposed antennas would be an incongruous addition to the roofscape which would draw the eye away from ‘solid’ appearing host buildings and other, traditional listed buildings within the surroundings. This visual impact leads to heritage harms.

The harm to the setting and significance of the various listed buildings and the setting, character and appearance of the conservation areas would be contrary to local and London planning policy and

guidance, and the NPPF which seeks to conserve and enhance the significance of designated heritage assets. The decision-maker would also not be able to discharge their statutory duty of paying special attention to preserving the settings of listed buildings and the character and appearance of conservation areas if the application was to be approved.

The proposed telecommunication masts should be refused as the development would not preserve the character or appearance, special interest, or significance of the surrounding heritage assets. It would have the greatest harmful effect on the setting and significance of the Bloomsbury Conservation Area, Congress House and Parnell House which as both are Grade II* listed are therefore particularly important buildings of more than special interest.

Cumulative Visual Impact & Heritage Harm

The applicants Site Specific Supplementary Information (SSSI) document (dated 22nd March 2024) states that *“The Application site (3) is one of three sites required as part of a 3 site split cell solution to fully replicate the coverage provided by the former Castlewood House. In conjunction with the application site which provides **part replacement coverage to the north of the former Castlewood House cell area for VMO2 [Lichfields own emphasis added]**, Albion House 55-59 New Oxford Street will provide part replacement coverage to the east of the former Castlewood House cell area for Vodafone (1), and Central St Giles (2) will provide part replacement coverage to the south of the former Castlewood House cell area for both VMO2 and Vodafone”*.

This new proposed cell site at 100 New Oxford Street (subject to this application) is only able to provide partial replacement coverage for the loss of the cell site at Castlewood House and, as such, the operator is independently pursuing 3 separate sites.

The planning status of the adjacent sites is summarised in Table 1 and 2 below:

Table 1 Summary of planning history pertaining to telecommunications development at Albion House

Application Ref.	Description of Development	Operator	Decision / Date
2020/1649/P	Installation of 9 antennas, 5 transmission dishes, 3 equipment cabinets, and ancillary development thereto.	Cornerstone (O2) and Vodafone Ltd	Refused 05 October 2020
2021/3402/P	Installation of 9 antennas, 2 x 300mm dishes, 2 equipment cabinets with ancillary works to roof.	Vodafone and Telefónica (O2)	Refused 1 March 2022
2024/5729/INVALID	PROPOSED BASE STATION INSTALLATION	Unknown	Invalid / Withdrawn

Source: Camden Planning Portal

Table 2 Summary of planning history pertaining to telecommunications development at Central St Giles

Application Ref.	Description of Development	Operator	Decision / Date
2020/1647/P	Installation of 10 no. antennas (top height of masts 52.10m AGL), 2 no. transmission dishes, equipment cabinets and ancillary development thereto.	Cornerstone Telefonica UK Ltd and Vodafone Ltd	Withdrawn
2020/2015/P	Installation of 10 antennas, 2 transmission dishes, 5 equipment cabinets and ancillary development thereto.	Cornerstone Telefonica UK Ltd & Vodafone Ltd	Refused 5 October 2020 Appeal Allowed 22 November 2021
2020/5822/P	Installation of 6 x antenna apertures, 2 x transmission dishes and 8 x equipment cabinets & ancillary works.	EE (UK) Ltd and H3G (UK) Ltd	Prior Approval Refused 08 February 2021 Appeal Dismissed 22 November 2021
2022/2378/P	Installation of 6 antenna apertures, 2 transmission dishes and 8 equipment cabinets to roof and development ancillary	EE (UK) Ltd and H3G (UK) Ltd	Permitted 27 February 2024

Source: Camden Planning Portal

As set out in the above tables, there is a drawn-out planning history for all sites within the 3-cell site solution to replace the loss of Castlewood House, demonstrating the complexity and sensitivity of the historic environment in this location. Given the relationship between telecoms proposals at these sites (which seeks to restore the lost coverage from Castlewood House) it is pertinent to assess their relative cumulative impact - both from a heritage/visual perspective along New Oxford Street, but also due consideration to the implications of a refusal to grant planning permission on one of the three sites (in particular Albion House). In this scenario, there is a concern that should planning permission be approved for 100 New Oxford Street, this will set a baseline position for further proliferation of equipment in an attempt to mitigate any shortfall at other local sites. Officers should carefully consider this in their decision making as this is a potential reason for refusal.

Public Benefits

The applicant's Supporting Statement refers to the capability of the public benefits of improved digital communications networks to outweigh environmental harm, in this case principally on the historic environment. However, the applicant has not assessed the potential harm to the significance of the Bloomsbury and Denmark Street Conservation Areas, nor the host building or nearby listed buildings. In our view the proposal would have a much greater harmful impact on the historic environment than is otherwise being suggested by the applicant. As such, we do not consider officers have sufficient information to understand heritage harm, and therefore cannot balance public benefits in reaching a recommendation.

Notwithstanding the above, although proposed telecommunications apparatus provides some public benefits (in this case those associated with improved digital infrastructure), the conflict with planning

policy is clear and the benefits cannot be considered sufficient to outweigh the harm to heritage assets. In this respect, based on the available information submitted to the application, the proposals would conflict with local and national planning policy, including Policy D1 and D2 of the Camden Local Plan.

Reasonable Alternatives

The application at 100 New Oxford Street is being pursued as the favoured option to provide “*part replacement coverage to the north of the former Castlewood House*” cell area (page 4 of the Applicants SSSI Document). The current search area assessing reasonable alternatives fails to consider potential sites beyond New Oxford Street and, it is reasonable to conclude that further alternative sites outside of the ‘desired search area’ (including existing cell sites) should be considered. Furthermore, coverage plots were provided to the previous 2019 application (ref. 2021/3402/P), and whilst these relate to 3G services only (which is being switched off from April 2025), updated coverage plots would be beneficial to better understand the gap in coverage and capacity around 100 New Oxford Street. Such information would prove beneficial to understanding the availability of a less sensitive host building (i.e. not positive contributors within Conservation Areas in the immediate setting of listed buildings), as well as the cell site’s relative role of within the 3-cell solution being sought.

Since the decommissioning of the Castlewood House cell site in 2019, the coverage and capacity in the affected area has been managed by existing neighbouring cells. Since the area has operated in this way for a substantial period already, it is reasonable to assume that the upgrading of these neighbouring cells may be an effective solution which does not require a new cell site. The Code also establishes standalone Rights to share apparatus, carry out works and to access land in connection with sharing¹, in accordance with the NPPF to keep number of electronic communications sites to a technical minimum (paragraph 120).

Recently, the High Court quashed an Inspector’s decision to allow an appeal by Hutchinson 3G (Three) to site a 5G mast in Surrey and within the Coombe Wood Conservation Area (*Murtagh v Secretary of State for Levelling Up, Housing and Communities* [2022] EWHC 2991 (Admin)). The decision is notable because it emphasises the need for applicants to justify the site selection process for a mast, by reference to the possibility of using existing base stations in the area, including those outside of the ‘desired search area’.

Our client considers the assessment of reasonable alternatives to have been overlooked by the Applicant, on the basis that the desired search area for this application is too large (it covers the wider area for all three proposed replacement cell sites), as opposed to also considering in sufficient detail the specific area around New Oxford Street. Additionally, no information has been provided in respect of the suitability of upgrading and sharing existing base stations within the vicinity of the area, including the ability for the equipment recently installed on Central St Giles (a building located outside of the relevant conservation areas) to be enhanced in order to mitigate the need for a 3rd cell site entirely. This is a potential reason for refusal.

¹ Part 2, S.57 The Product Security and Telecommunications Infrastructure Act 2022.

Other Considerations

The owner of the host building, our client, is well advanced in design feasibility to deliver a roof terrace (amongst other things) to provide external amenity space for building tenants. It is envisaged that this proposal will be subject to a planning application in the very near future, and therefore we wish to notify officers of the potential conflict between telecommunications equipment being in close proximity of proposed amenity space, which in turn raises concern about impacts on human health. Furthermore, we understand that pursuing this planned development has highlighted the technical challenge in getting a power supply to the roof, which could also significantly delay the operational timeframe of any telecommunications infrastructure.

Whilst an ICNIRP declaration has been submitted alongside the application, in accordance with the NPPF (paragraph 122), the introduction of amenity space on roof level at 100 New Oxford Street could present issues in this respect. Furthermore, whilst the declaration includes 'the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location', as this is part of a 3-cell site solution, it is not clear whether the proposed equipment at Albion House has also been taken into account.

Conclusion

We do not consider the location or the host building suitable for telecommunications equipment of this nature. The apparatus would represent large, uncharacteristic additions to the roof and would be highly visible in the streetscene, and incongruous with the prevailing roofscape. A site visit and desk-based analysis has confirmed that the proposed development would cause visual impact, and harm to the setting and significance of various listed buildings, including the Grade II* listed Congress House and Parnell House, along with the character and appearance of both the Bloomsbury and Denmark Street Conservation Areas, together with the host building itself, a positive contributor and non-designated heritage asset. Furthermore, there are serious concerns over cumulative impacts (visual and heritage harm), the lack of a tangible public benefits case, a lacking assessment of reasonable alternatives, and a grave concern about impacts on human health should the roof space be used for amenity purposes in the future.

Notwithstanding the various shortcomings of the application documentation, the proposal itself clearly conflicts with a myriad of development plan and national planning policies and should be refused accordingly.

If you have any queries about our representations, then please contact me.

Yours sincerely



Alan Hughes
Planning Director
MPlan (Hons) MRTPI