

5th December 2013

Neil McDonald
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London,
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Dear Neil

Sub: WEST CENTRAL STREET

This letter provides further justification for the demolition of No 16a, 16b and 18 West Central Street in response to the letter from EH dated 26th September 2013. It takes full account of the national planning policy framework in relation to the assessment already made in my Townscape and Conservation Assessment June 2013 (TCA13).

Evaluating substantial or less than substantial harm

The NPPF gives guidance on the designation of heritage assets and in particular the designation of conservation areas at paragraph 127. It states that designation should be justified on the basis of their special architectural or historic interest.

The application site sits outside the main Bloomsbury Conservation Area in Sub Area No 8 because it and the neighbouring buildings are not of prime Bloomsbury character, i.e. Georgian streets and squares. Sub Area No 8 consists of a varied character of rather later buildings as set out in my TCA13.

Paragraphs 128 and 129 of the NPPF, deal with determining the significance of any heritage asset. In terms of Sub area No 8 it is axiomatic that the enclave is subsidiary and therefore less significant than the elements which form the central Georgian part of the area. This fact sets the context of the measurement of significance of the building proposed to be demolished. Thus it is a building which is a considerable 'distance', in cultural and aesthetic terms, from the Georgian core.

Within the above context, I have assessed the significance of the part proposed for demolition based on the EH Guidance on Conservation Area Appraisals document. It is my view that to have particular significance, the building needs to rate highly in most of the 10 categories listed, these are set out in my TCA13 on pages 20 and 21. EH take Point 4 and in answer to the question: "Does it, individually or as

part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?”, state that the building acts as a reminder of the gradual development of a settlement in which it stands. The question must surely be, “does it do so in any significant way?” For instance if it were taken away would it be possible to understand the gradual development without it or would a phase of that development be missed out? I believe the loss in this regard would be minor. EH also take point 5 that the building is clearly associated with the historic street layout etc. Virtually all buildings do, but the point asks 'is there a significant historical association' to which I agree there is an association but that it is ordinary, rather than significant. To Point 7 about whether it reflects traditional functional character or former uses, I say there is a minor reflection of this kind whereas EH do not quantify it.

In light of the site’s location in Sub Area No 8, away from the core of the conservation area, my assessment of the 10 criteria and the optimum viable use described below, I conclude that the significance of the building to the designated heritage asset, i.e. the conservation area, as a whole, is low. Therefore the proposals fall to be assessed under NPPF para. 134, where there is less than substantial harm to the heritage asset.

Finding a viable use for the building consistent with sustaining or enhancing the conservation area

NPPF para. 126 recognises the desirability of sustaining and enhancing conservation areas as heritage assets by putting them to viable uses. The architects have assessed the existing building’s optimum viable use and concluded that its continued use as a nightclub is the optimum viable use for the reasons below.

Characteristics of existing building:

- Over a third of the existing floor space is situated below ground which is a fundamental issue limiting the suitability of the building (or amount of useable floor space) for most potential occupiers.
- The small amount of above ground floor space limits both the number of potential occupiers and the size of each occupier. This in turn suppresses the value of the building.
- The building sits within and faces a very unattractive environment. Potential occupiers needing an attractive address and building will quickly rule out 16-18 West Central Street.

Suitability of existing building for specific uses

Residential: Over a third of the accommodation is below ground which would far exceed residential requirements for the likes of media rooms, storage, utility rooms etc and unusable amount of ancillary storage space. At ground and first floor the existing building is very deep with few opportunities for windows, which compromises the quality and suitability of living space. The second floor has windows, but is very small.

Office: The size of the basement is a drawback in terms of creating good office space but has greater scope than a residential use. The ground and first floors are deep and not well lit but could be supplemented with artificial lighting. Second floor is too small to be much use once a core is added.

Retail: Only 30% of the floor area is at ground which together with the tucked away, off-pitch location isn't an attractive proposition for potential retailers.

Nightclub: The deep and underground space isn't a concern for nightclub operators. Similarly the compromised above ground floor space can work as back of house space. The quality of the building and isolated, unattractive environment have little effect on the success of nightclubs who instead trade on the entertainment experience inside the building. The owners of the building have received an unsolicited approach from Sankeys, a nightclub operator, with premises in Ibiza and Manchester looking to expand their brand.

The nightclub use is inconsistent with and therefore undoubtedly detracts from the character of the conservation area.

Public benefit and optimum viable use

Para 134 of the NPPF states that less than significant harm to the conservation area should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Local amenity groups (Bloomsbury Village association and Covent Garden Community Association) and the Police have reported and recorded a catalogue of crime (drug dealing, sexual assaults, threatening behaviour, violence, muggings) and other anti-social activities caused by the nightclub and which have undermined the quality and safety of the area.

The optimum viable use of the building as a nightclub would, contrary to NPPF principles, detract from the character of the conservation area as a heritage asset. Furthermore, its removal would be regarded as a significant public benefit by those living in and responsible for policing the area and this should be weighed against the minor contribution the building can be said to make to the conservation area.

Criteria to be taken into account by local planning authorities when determining applications

Para 131 of the NPPF identifies three criteria which decision makers should take into account when determining applications:-

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

Keeping the existing building in its optimum viable use (ie as a nightclub) will not “sustain and enhance the significance of the heritage asset (*conservation area*)”. In fact, quite the opposite, because it will continue to detract from the conservation area in both its current appearance and use and this isn’t outweighed by EH’s view that “the building is a reminder of the gradual development of the settlement in which it stands”;

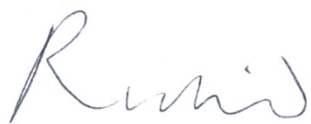
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;

Conserving this part of the conservation area will not positively contribute to making a sustainable community because of the way the nightclub use undermines residential amenity, safety etc. Similarly, it doesn’t meaningfully contribute to the economic vitality of the community. The amenity groups representing the area and Police have both suggested the building and use is one they would much rather do without in terms of improving their community;

- the desirability of new development making a positive contribution to local character and distinctiveness.

The new building will make a positive contribution in improving local character and distinctiveness - giving the place the opportunity to move out of the decline that has beleaguered perception of the area by introducing a vibrant mix of uses consistent with the best kind of uses already in the conservation area – i.e. housing, retail and offices. It will act as a catalyst and benchmark with which to encourage other sites in the immediate vicinity to come forward with their own regenerative schemes including the former post office site and the site around the car park ramp opposite.

In summary, the above demonstrates the adverse impact the existing building and use has on this sub-area of the main conservation area. Its loss will cause less than significant harm to the conservation area and that loss is far outweighed by the public benefit of removing the most viable use of the existing building i.e. as a nightclub.



RICHARD COLEMAN
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