**CALTHORPE STREET RESIDENTS’ ASSOCIATION WC1**

**c/o Judy Dainton 22a Calthorpe Street WC1X0JS and Ann Nkune 8a Calthorpe Street WC1X0JS**

[**judithomas@blueyonder.co.uk**](mailto:judithomas@blueyonder.co.uk)[**ann.mcdermott@blueyonder.co.uk**](mailto:ann.mcdermott@blueyonder.co.uk)

**Camden Council Planning Department BY EMAIL**

**Islington Council Planning Department BY EMAIL**

**August 2nd 2013**

**RESPONSE TO PLANNING APPLICATION RE ROYAL MAIL DEVELOPMENT**

**at Mount Pleasant WC1**

**Camden Ref: 2013/3807/P Islington Ref: P2013/1423 and P2013/1435**

Dear Sirs,

This is our Association response to this planning application. We are commenting on both the Camden and the Islington parts of the application and therefore sending our reply to both planning authorities. Our Association is based in Camden.

Please note that we use the word “we” to denote our Association members and “you” to denote the applicant/developer (Royal Mail)

This response represents the collective views of our members, and is circulated to these members, our wider local neighbourhood, our local Camden Ward Councillors and other interested parties.

**GENERAL ISSUES CONCERNING THE PROPOSED USE OF THE LAND**

* We all understand the national need for Housing, which is an acceptable use for this vacant land at Mount Pleasant; but we wish to record that, locally, the preferred use of the site would be for the much needed new secondary school south of the Euston Road.
  + Councils should note the imminent closure of Clerkenwell Fire Station on Rosebery Avenue, which will contribute to safety risks in the proposed new development.
  + We note that the present proposal does not include any social provision. Health provision, nursery provision school provision will be needed for this new influx of people yet none has been made. We ask that our request for social provision to be made.
  + We note that proposal contains little affordable housing and little social housing. The majority of our members wish it to be noted that they want to see 50% of this development to be affordable/social housing. There is great need for social housing in both Camden and Islington boroughs, and this need should be reflected in the proposed development.
  + We would also wish the authorities to note that market price for housing in Central London is extremely high, so that “affordable” housing is only really “affordable” to comparatively wealthy people. The housing need in Camden and Islington concerns poor people. Therefore we would want the proportion of social housing to be 30% and “affordable” housing to be 20% of the total housing to be built.
  + We would ask you to note our objections to the proposed layout of the site and the proposed architectural style. It does not meet the stated vision of the Councils’ vision for the area.
  + We also note that a majority of our members (but not all) support the postal union and the postal workers in their opposition to the sale of the Royal Mail business. We would like you to record that view.

**GENERAL ISSUES CONCERNING THIS PLANNING APPLICATION**

* **The density of population is high**. Whilst this density is within the limits of the London Planning requirement, it should be noted that both Camden and Islington are already densely occupied Inner London boroughs. This proposal will bring over 1000 people into a particular locality which already houses a large number of people in council estates and multi-occupied houses. We say the density is too high for the locality and the existing infrastructure. **We ask that the overall density of occupation should be lowered.**
* **The density of the development is particularly concentrated on the Camden site and we ask for this to be lowered.**
* **The housing component is mainly for private market accommodation** with a small allocation for “affordable” and “social” housing. We say the “affordable” and social allocation should be higher, to comply with the Councils housing needs. **We ask that the design concept reflects a different housing provision, with 30% social housing and 20% “affordable” housing, making a total 50% housing allocation for poorer members of the population.**
  + **The layout of buildings on the site is wrong**. At present it is a fortress like construction with tall buildings along most of the perimeter (Farringdon Road, eastern Calthorpe Street and Mount Pleasant). For instance, these tall and bulky buildings will further constrict the difficult traffic junction at Calhorpe Street/Margery Street, Farringdon Road, and will overshadow Laystall Court, Mullen Tower and the Sir Christopher Hatton Primary School. The large tower proposed by Phoenix Place will overlook and overshadow the existing local residences in Calthorpe Street. **The proposed layout is therefore inimicable to the local area; it threatens but it does not enhance the local surroundings**. **This is contrary to the stated aims of the Camden and Islington Supplementary Planning Document (SPD)**
  + **We say the layout should be changed to comply with the stated aims of the SPD that the new buildings should blend with existing structures.**
  + **The plans were meant to “open up” the site. They do not**. The proposed “Calthorpe Lane” runs from no-where to no-where, since it does not provide a viable crossing of Farringdon Road into residential Islington.
  + **We say the proposed layout of buildings has to be changed to open up the site properly.**
    1. to provide a wider corner space at the SW corner (Mount Pleasant/Gough Street) and the NE corner (Farringdon Road/Calthorpe Street/Holiday Inn),
    2. with a diagonal traffic-bearing pedestrian link that runs from Holiday Inn to Mount Pleasant,
    3. and a similar diagonal traffic- bearing pedestrian link that runs from Grays Inn Road/Coley Street through to Mount Pleasant/Phoenix Place (SE corner)., together with a continuation of Coley Street into the proposed development.
    4. These links should be proper thoroughfares ( not cycle lane/alleyways) for reasons of security and safety.

This complies with the stated aims of the SPD, whilst the present proposals do not.

* **THE PROPOSALS IN DETAIL AS CONTRASTED WITH THE SUPPLEMENTARY PLANNING DOCUMENT.**

The Supplementary Planning Document (SPD) agreed by both Camden and Islington, sets out a vision for the area. The main issues are:-

* Create a new neighbourhood which integrates fully into the local area and supports a new mixed and balanced community;
* Provide new housing, particularly affordable housing, much of which would be homes suitable for families;
* Open up the site with both new and improved streets that make better connections between Mount Pleasant and the surrounding neighbourhoods;
* Provide new retail and commercial buildings which will provide work for local people
* Create new high quality and inclusive public spaces for local people both on the site and at its four corners;
* Promote high quality design for buildings and public spaces which sustain and enhance the historic significance of the site and its surrounding area

The present proposals do not fulfil these aims.

**3.1 Creating a new neighbourhood which integrates fully into the local area.**

The proposed design/layout is greedy, building out to the perimeter of the land site. As a result it presents a dominant barrier to the existing dwellings. The scale and mass of the proposed buildings, and their position in relation to the existing dwellings (which are mainly Georgian/Victorian) is alien. This is a development which could be placed without comment in Milton Keynes or Croydon, but bears no relation to the history, scale, design or content of the existing neighbourhood. **In no way does this design and layout integrate with the local area.**

In order to integrate with the local area the layout needs to be redesigned. It needs to be more open. The tall buildings need to be in the centre of the site with lower housing structures tapering down towards their more elderly neighbours.

**3.2 Creating a mixed and balanced community**

**The housing allocation needs to be re-thought** to provide more social housing (needed by both Councils) and “affordable” housing (needed by the population at large and supported by new Government legislation to provide mortgage help for first-time buyers). The advantage of this is that people in social housing tend to stay in their housing, providing a basis for a stable and balanced community. People in social housing also tend to come from many mixed backgrounds, which will help them blend into the local neighbourhood, which is at present mixed, balanced and integrated.

**The proposed housing is for market rent/purchase housing stock.** The planning application does not clarify whether the proposed housing stock is to be bought or let. However, in either case, this will not provide a stable community, since residents at the mercy of market forces are subject to change. People who rent, under present legislation, often rent on short-term agreements and move frequently. People who buy can also buy upwards and move out as the market affords, whilst some others may also suffer mortgage failure and repossession. This is not an ideal model for creating a mixed and balanced community.

**Therefore we think the proposed housing stock needs a more balanced approach to meet the SPD vision.**

**3.3. Supports a new mixed and balanced community**

There is no social provision mentioned in the proposal. If over 1000 people are to be housed on this site they will need medical care, nursery provision, play areas...provisions that cost public money. We see no proposals to provide this support. There is also the problem of pressure on the existing infra-structure, such as sewage, water. That issue is not addressed in the application. We require more details. (see section 3.8 below)

**3.4 Opens up the site**

The aims of the SPD have not been addressed.

The proposal presents “Calthorpe Lane” running from Phoenix Place to Farringdon Road, as a pedestrian way, with a “meadow” and shops (Islington part of site). On the Camden side there are going to be “cycle-paths” and “walkways” threading through solid blocks of housing. This is nonsense.

**Islington Site**

“Calthorpe Lane” runs from no-where to no-where. It has no follow-on across Farringdon Road so it does not connect to Islington proper in any meaningful way. It runs eastward to the middle of Phoenix Place, itself a bit of a no-mans-land except as a traffic rat-run. On the present plans this new “ Calthorpe Lane” does not connect onwards, westward through to the Camden site in any meaningful way...it just sort of stops! It appears to have no purpose except to fulfil a token demand of the planning brief.

Meanwhile the sensitive traffic junction of Calthorpe Street/Farringdon Road/Margery Street/Lloyd Baker Street is to become even more visually cramped. Not only does the proposal place a large and tall row of shops/housing running right up to that corner along Calthorpe Street; but Charles Simmonds House (across Farringdon Road, opposite the Holiday Inn, on corner of Margery Street) is already to be redeveloped, to be much higher and to have its footprint increased right out over the existing gardens to the pavement edge. You do not appear to have taken this into account. This is a difficult junction at the best of times and this proposed development will make it worse.

Furthermore, the proposed new entrance for the Royal Mail vans is to be sited adjacent to the Farringdon Road entrance to “Calthorpe Lane”. This appears to be yet another difficult traffic junction in the making, with Royal Mail vans having little or no turning space from Farringdon Road into their new underground tunnel. This really does not seem to be planned with any thought for traffic flow or pedestrian movement. We find this an unacceptable solution and say this should be designed with more care and sensitivity to the existing neighbourhood and to the postal workers who will have to use this drive-in.

**The proposed tall building at the corner of Calthorpe Street/Farringdon Road should be removed and that land-space traded back to Islington for traffic useage. In that way the awkward traffic corner can be rounded back to align with the Margery Street intersection. This will still allow pedestrians access to the road crossing at the traffic lights by the Holiday Inn.**

**We would also propose a diagonal paved “lane” (wide enough to take permitted traffic such as dustcarts and delivery vans) to run from this corner through the development to Phoenix Place and Mount Pleasant. That will open up the site in a meaningful way, from an existing crossing at Farringdon Road to the populations of Mount Pleasant. (Links Islington and Camden sites).** This new “lane”, if placed where we propose, will also be at some distance from the proposed new postal-van drive-in entrance, which would seem to be a safer pedestrian option. It will also allow pedestrians to walk to/from Islington at a proper crossing point.

**We would also propose that the tall tower block planned for mid-Phoenix Place is not built at all, or moved away o the middle of the Camden site where it will not overshadow, overlook and dominate the existing Victorian terrace running along Calthorpe Street.**

**Camden Site**

This site is even less opened-up. It is extremely crowded with buildings, interlaced with bike lanes and “mini-squares”. This is totally unacceptable, and against all the stated aims of the SPD.

* **One glaring problem is the placing of the tallest building in the whole development on the corner of Mount Pleasant and /Gough Street at the extreme SW corner of the site.** This tower cuts light and air from Laystall Court, Mullen Tower and even from the mansion blocks on Gray’s Inn Road. This tower also dwarfs the local primary school (Sir Christopher Hatton) and cuts the primary school children and their parents off from any direct access to the new site. **The position and height of this building is unacceptable. It must be moved away from that corner and lowered in height, or not built at all..**

The corner of Mount Pleasant/Gough Street should then be cut back and curved round to give a proper vehicle turning point and paved open space, allowing the existing dwellings and the primary school space and room to breathe.

* This part of the site is shown as having groups and blocks of buildings threaded through with bike-lanes and “mini-squares”. This design concept is alien to the vision of the SPD

**The concept of bike-lanes, though ecologically attractive, is not accepted by our members, on grounds of health and safety**. This view has been echoed by the local community police. Although this is by and large a very pleasant settled neighbourhood there is a sub-strata of local drug-dealing, “hanging-out”, street-drinking and general small-scale criminality, mainly from local youths and local hostel-dwellers. It is our view that cycle-lanes and hidden corners/”mini-squares” will encourage this behaviour. The community police agree.

The site needs to be opened up with wider walkways/roads that connect through the site and are well-lit, with clear visibility.

The SPD strongly suggests that housing-stock layout must echo the design of Georgian Squares, which are predominant in this neighbourhood, Wilmington Sq, Bloomsbury Sq, and Mecklenburg Sq to mention but a few. **The proposal does not comply with the vision of the SPD.**

**Camden Site**

The proposal shows a very dense area of housing, congested with buildings, aerated only by bicycle lanes and mini-squares, with very little open green space. This is completely contrary to the concept of a Georgian Square, where the proportions of building mass to open space were precisely calculated to provide a large amount of open space.

**We would request that this whole site layout is re-designed** to provide **more traffic-bearing lanes** (as suggested above), **larger proportion of open green space** to building mass, and **tall buildings (if they must be included in the design) restricted to the centre of the site,** so they do not dominate or overshadow the existing dwellings. Less housing density is required on this site.

**Redesign of the layout of the Camden site is required to open up the site, to comply with the vision of the SPD, and to mix in harmoniously with the existing architecture.**

**3.5 Provide retail and commercial buildings which will provide work for local people.**

The proposal shows some cafes and shops, some “flexible use units” and some office space. Qualitative indications are given for building use but there appears to be no stated commercial vision. All we can say is that there are quite a lot of small retail units and quite a high proportion of office space.

There appears to be no economic model or any reasoned argument to support the inclusion of these features. Rather, they appear to fulfil the aim of making the densely built environment seem more “porous” and street friendly, but to have little economic viability.

* **Shops.** Local shops in the area already struggle to stay open. Some have closed. We do not want to see a new development containing empty shops. Empty shopping areas promote vandalism and crime.

The future of the high street is in doubt (Mary Portas High Street campaign, increase in on-line shopping etc, short leases, lack of parking space, rent and rates increases).

The local area is well served by neighbouring shopping areas (Brunswick Centre, Exmouth Market, Holborn Circus, Leather Lane, Angel, Kings Cross).

We see no need for a new shopping area unless you (developers)spend a great deal of money promoting a new shopping venue, giving shop-keepers inducements such as low rents and possible rates discounts (councils). We see no evidence that you and your eventual commercial developer partner intend to do this. **We need more information about your proposals to make this retail part of your submission become successful.**

* “**Flexi-units”.** These obviously are vacant commercial spaces which can be used in a variety of ways depending on market forces

**There is a need for small artisan workshops in this locality** (particularly so when the Wren Street units are closed down). However the success of these workshops depends on the developer offering low rentals over a long-term period. **Will the developers offer such inducements?**

**There will be a need to develop some of these designated commercial “flexi” spaces to provide social support systems ( nursery/play group, GP consulting rooms etc)** which you have not made provision for in your planning submission. However the funding for such services will come out of the public purse (which is limited). **Do you have plans to subsidise the social component of your offering over and above the Section money you have to give to Camden and Islington Councils? Will you build the socially required buildings from your own purse?**

**We need more information about your proposals to make this retail part of your submission become successful. We also need to know what you will give back to the community over and above what is legally required.**

* **Office Space**

We do not understand this at all. At present there are empty office spaces being advertised on Gray’s Inn Road, Rosebery Avenue Exmouth Market and High Holborn. When the recession recedes these large office buildings are there to take up the slack. The huge development at Farringdon Station (CrossRail) is set to provide a large commercial hub round that station not half a mile from your site. We do not see that your offering can compete commercially with this competition.

**We therefore see no need for any office component in this proposed development.** If the plans are amended to disregard any office component, then the size of the building development can be reduced, more green space can be allowed, and our required reduction in density can be achieved.

* **Local job provision**

This is nonsense. Employment is determined by skills, not by living in the locality. It may well be that some small level of local employment is achieved, but this is entirely open to market forces.

Some supplementary income in existing local shops/pubs/cafes may be derived from an influx of new population, but the proposed development in itself will not automatically produce “new” local jobs.

This proposal is at present designed to make money out of the housing market, and any small benefit to local employment is incidental. **We object to your pious posturing on this issue**.

**3.6 Open Spaces**

The SPD vision states

* Create new high quality and inclusive public spaces for local people both on the site and at its four corners;

**None of the present proposals meet this part of the SPD vision.**

The proposed “Calthorpe Lane”, with “meadow” is an access route surrounded by greenery surrounded by shops. As we stated above, its location and connectivity is wrong and we have made suggestions for a different orientation. However, as the proposal stands this “meadow” is nothing more than some planting on a piazza which is also a public thoroughfare – a pleasant idea but hardly a high quality and inclusive public space. (Islington sector)

To the west of the site (Camden sector) the proposals show no significant open spaces, only small “mini-squares” with some planting in hard landscaping. This does not meet the stated vision of the SPD.

The present proposal greedily builds up to the edges of the site including all four corners. We have discussed (above) our demand for the site to be redesigned, and our perceived problems with the NE and SW corners.

We ask that you redesign the layout of the development to include proper, **large**, public-access squares amongst the proposed buildings.

**3.7 Design and History**

The SPD states that the proposal should:

* Promote high quality design for buildings and public spaces which sustain and enhance the historic significance of the site and its surrounding area

**This proposal does not meet the SPD vision in any way at all**

* The present layout of the development presents an inward looking fortress which creates a barrier to the existing buildings and existing community. As stated earlier, the site layout needs to be changed so the new buildings merge more seamlessly into the existing environment.
* The proposed architectural style is anodyne “standard housing estate” presentation. This whole development would be possibly acceptable in some New Town or non-descript suburban brown-field site but is totally unsuitable for our neighbourhood. The chosen style neither merges with the existing local architecture, nor contrasts with it with any stylistic verve or distinction. The proposal is dull and lacks architectural merit.
* This is a Central London site with considerable history. We want you to be more aspirational and build a new housing estate which will win architectural prizes, will be a spectacular place to live. You can make money from excellent design, if you have the courage to redesign the whole project and produce something of worth and stature.
* Your proposal has no design qualities of merit, and should be rejected out of hand on those grounds alone.

**3.8 Local conditions (with reference to your Non Technical Summary Document)**

You do not appear to have considered life as it is lived outside the boundaries of your site. Nor does your planning application refer in any detail to some of these issues. Your non-technical Document makes clear that you have not completed any of the required risk assessments to date.

We offer some information in this section below.

**Traffic**

**Farringdon Road (Islington)**

This is an awkward main thoroughfare, reasonably narrow and very busy. Our traffic count shows a much higher volume of traffic through-put than you suggest in your Non-Technical Summary Document.

We have mentioned our objections to your design and layout re the busy junction of Calthorpe Street/Farringdon Road/Margery Street. We think you need to redesign your site to ease that NE corner of your site to provide more visibility and traffic space.

As already stated your proposed “Calthorpe Lane” goes from nowhere to nowhere; we have made suggestions about where and how this can be redesigned and re-sited to better public benefit.

We have objected to your proposed drive-in entry to the subterranean Royal Mail loading bay; this will impede the traffic flow on Farringdon Road. We say you have to re-think this design, and allow more space for postal vehicle circulation.

**Phoenix Place (Camden and Islington)**

This byway road is currently used a traffic rat-run but basically goes from no-where to no-where. Your design should open up the site and link through to this road.

**Calthorpe Street (Camden)**

We refer to the **Camden section of this street (Phoenix Place to Gray’s Inn Road).**

This street has a series of traffic-calming devices ( bollards/traffic islands and “sleeping police-men”. These were campaigned for by local residents following traffic accidents (including a child death) and provided by Camden Council. **We insist these safety measures remain.**

Similarly, **Gough Street (west)** is bollarded and paved at its junction with Calthorpe Street, as a safety measure to prevent this street becoming a speedy rat-run into Calthorpe Street and Gray’s Inn Road. At the moment no traffic can pass through. The reasons were the same as above. **We insist this side street remains cut off, and does not become a traffic through road, for reasons of pedestrian safety.**

**Local buildings**

We would draw to your attention that the **Calthorpe Street terrace from Gough Street to Phoenix Place** (built in the 1850s and at present managed mainly by a housing association with some property held by Camden Council). This terrace, backing on to your site, was built with inadequate foundations and although remedial work has been done, these dwellings still do not rest securely. **We have concern that these inhabited dwellings may suffer from your works (pile-driving, vibration, subsidence). Your Non Technical Document makes clear that you have not made adequate risk assessment tests. We demand you do test the possible risks to these buildings and make your findings public before planning permission is granted.**

**We have asked for your proposed assessment of light and air interference to this same terrace** from proposed new buildings on Phoenix Place. Some local people were visited by a Royal Mail consultant who surveyed their properties to assess the effect of the proposed large building on Phoenix Place upon these dwellings, but do no know the findings. **We would ask to see these assessments.**

**Sewage and Water.**

Your Non Technical Document states that your new water and sewage system will link into the existing infra-structure. **However you also state you have done no tests or risk assessments to ensure that this is viable, let alone sustainable.**

We would ask you to note that

* The main sewer is the enclosed River Fleet. Its brick enclosure is Victorian, it leaks in places and is subject to flooding (as the river rises and falls). As a result of this (and, no doubt, inadequate or poorly maintained local sewage pipes) many residents in Calthorpe Street experience annual sewage back-flows. You have no way of knowing if the added effluent of 1000+ new residents can be absorbed into this antiquated system. **We insist you perform and make public the required risk assessment tests before any planning permission is granted.**
* The local water system is prone to flooding at street level. The corner of Phoenix Place/Calthorpe Street (opposite the Pakenham Arms pub) is a particular black spot, and there are other weak areas in Mount Pleasant. **We insist you perform and make public the required risk assessment tests before any planning permission is granted.**

**The Land Condition of your site**

Your Non-Technical Summary Document mentions archaeological remnants, industrial waste, pollution and war damage (including unexploded bombs )but says no testing has been done. **We insist you perform and make public the required land tests, archaeology tests and risk assessment tests before any planning permission is granted.**

**3.9 Social Provision**

**There is a proportion of money which the developers must by law give to the councils (Islington and Camden) when this development goes ahead.**

**We would like to know how much this money is.**

**We insist that the councils spend this money in this local area to help the existing local community and the new residents. We do not want this money dissipated throughout the boroughs on other projects (however worthy these other projects may be)**

For this Mount Pleasant project there will certainly be need for

* Nursery/playgroup provision
* Playspace
* Community hall/meeting place/youth space
* GP premises (\* see note below)

And there may be other social demands which come to light as the development proceeds.

There are other needs for support in the immediate locality, one of which is the Calthorpe Project in Gray’s Inn Road. We will, in due course, provide Camden Council with notes on local needs.

**\*The Finsbury Health Centre (Pine Street EC1) is the nearest health provision centre to the proposed new development.** It currently houses local authority health services and two large GP practices who serve local patients in both Islington and Camden. However that famous and listed building is becoming unfit for modern health care purposes. Current thinking is that the building will be kept for local authority health services but the GP practices may have to move out. They will need to find new premises in the local area. **We say that this proposed housing development should include the possibility of supplying purpose-built GP surgeries, with all attendant offices.**

**Our main concern in this sector is that the developers build the required social buildings within their own budget and do not encroach on the “councils’ social money” to provide these services.** After all, once the required buildings are in situ the councils will still have to find the money to staff and run these concerns and the “developers’ money” will be essential for that purpose..

**Your planning application does not indicate that you intend to spend anything on social provision. We need more information on the subject of what you will contribute to the social costs, before any planning permission is granted.**

**CONCLUSION**

**We have no opposition to much needed housing being built on this site (although a secondary school would have been a locally preferred usage)**

**However we are opposed to the presently proposed development. We find it not fit for any purpose except to generate housing income for the developer. It is motivated by greed and lacks any benefit for the local area.**

**We find it to be ill-designed, ill-laid out, completely insensitive to the locality and of no architectural merit. Our ideal would be for a project which allows you to make profits, the locality to benefit from an elegant building development, and society in general to gain social rewards. This is entirely possible.**

**We say the concept in its present form should be rejected in total and resubmitted with a very different vision.**

**We have set out our detailed objections at length in the main body of our objection (above).**

**In summary:**

* The development is greedy, designed for maximum housing stock revenue but providing little benefit for either the proposed new residents or for the existing local residents.
* The density is too high for this locality
* The housing component should include more social housing.
* The layout is wrong and needs complete revision if it is to blend in with the existing area. Tall buildings are intrusive and are in the wrong places. Tall buildings should be avoided wherever possible in this design.
* The architecture is both mediocre and intrusive; it does not enhance the neighbourhood
* The site has not been opened up sufficiently
* There is insufficient public green space
* There is no reasoned assessment of the need for shops and offices
* The office element of the commercial section is superfluous and should be rejected.
* Social provision has been ignored. Much more information is required.
* Risk assessments have not been done nor has the existing infrastructure been tested to ensure it can tolerate the needs of an extra 1000+ residents. More information is required.
* There has been extreme insensitivity to road junctions, to existing buildings (including our local primary school) and to control of minor local criminality.
* Lack on information of time scales, risk assessments re pollution and traffic routes/density during and after works.

All in all we conclude that this development application is of poor design and quality. It needs to be much more aspirational. We ask that you reject this application out of hand, and suggest that the developer goes back to the drawing board to provide a better solution.

Yours faithfully

Judy Dainton (Secretary Calthorpe Street Residents’ Association WC1)

cc. members of CSRA, signatories to local petition, other local community groups and voluntary organisations, Holborn & Covent Garden ward councillors, local MP Frank Dobson, local individuals who have expressed interest (trade unions, local GPs, local school, local traders etc).