

Bloomsbury Conservation Area Advisory Committee
61B Judd Street, London WC1H 9QT

5th June, 2013

Dear Mr McEllistrum

**Cartwright Gardens Student Halls redevelopment applications -
2013/1598/P & 2013/1787/C**

The Bloomsbury Conservation Area Advisory Committee would like to register its strong objection to this proposal. The building is too high, too bulky and altogether too aggressive and muscularly repetitive. It would severely damage the unique setting of Cartwright Gardens and the listed Georgian buildings that form the Crescent.

Scale in relation to the listed building of the crescent:

We have traced over the photos of existing views and traced on the outline of the proposed building. It is betrayed as being absolutely enormous compared even to what is existing let alone Burton's crescent. It does not 'speak of' modest student residences in a quietly elegant area of Bloomsbury but of a hugely over-greedy development looking more like a hotel or conference centre. Even with the top 2 storeys included within a mansard roof, the proposed building is still **9 storeys high, along the entire eastern side of the square**. This is 5 storeys higher than the Georgian crescent opposite.

The proposal directly contravenes the following Camden planning guidelines in respect of the listed buildings of the crescent -

In DP 25.15 Camden states that "*The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development....The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings.*"

Policy DP 25 (b) states that any new building within the Conservation Area- should 'preserve and enhance the character and appearance' of that area which this proposal signally fails to do. It is also stated in DP25(g) that Camden will not permit development that 'would cause harm to the setting of a listed building'.

The elegant crescent of Burton's listed buildings on Cartwright gardens is a uniquely important in-tact survival of Georgian urban design. Its setting and appreciation is extremely sensitive to the scale and impact of anything proposed along the east side. Additionally on Leigh Street and Sandwich

Street (a quiet residential street to the east) there are listed Georgian buildings the character of whose setting and residential amenity would be severely harmed by the grossly insensitive scale of the proposal.

Demolition of Canterbury Hall and Garden Halls

We very strongly resist the loss of Canterbury Hall. Not only is it a fine building in its own right (listed as a local contributor) but its retention could perform a vital function in breaking down the monolithic character of the new proposal. We do not accept that it is 'unviable' to refurbish or at least to retain the facade. We have so often seen that experts can, when there is an economic imperative, make the case for the necessity of demolition and such assertions are of course difficult to challenge without the mobilisation of time and resources which are well beyond either Camden Council or the BCAAC. The façade of Canterbury Hall, with its art deco features, upper brickwork, stone rusticated base and ground floor render, clearly responds appropriately to the Georgian crescent buildings opposite.

DP 25.8 states that "*When a building makes little or no contribution to the character and appearance of a conservation area, any replacement building should enhance the conservation area to an **appreciably greater** (our bold) extent than the existing building.*" In this case we have the proposed demolition of a building which is already listed as a 'local contributor' and its replacement with a building which, as we have demonstrated above, would cause great damage to the character and appearance of the Conservation Area.

While the buildings along the east side of Cartwright Gardens are not listed as contributors to the Conservation Area the fact that they are separate buildings, with heights varying between 5, 7 and 14 storeys and with some blocks placed well back from the pavement leaving an open space in front, has made the buildings a relatively unobtrusive presence in the neighbourhood. Their replacement with a building of the bulk and monolithic character of the proposal would be very much to the detriment of the Conservation Area.

The design:

Although the University's proposal may have a coherence lacking in the existing residential blocks, the design has a muscularity, scale and repetitiveness that overwhelms the gentle elegance of the crescent opposite and the low rise heritage buildings along Leigh Street and Sandwich Street.

We should like to point out that Georgian terraces, to which the proposal is likened by the architects, differ in fundamental respects from the current proposal.

Firstly the 'big composition' of a Georgian terrace is made up of individual houses, each of which has its own front steps, gates, doors etc. This immediately makes the whole much more domestic in feeling - there is no

sense in which this could be mistaken for a single institution. This is further reinforced by the subtle variations of design (fanlights, doorknockers etc). between the individual houses that make up the terrace.

What we have proposed here is an over-sized civic building of an institutional nature, completely inconsistent with the gentle curve of the Grade II listed late Georgian townhouses opposite.

Retention of the 1960s tower block

Despite the University's insistence that the Garden Halls are "coming to the end of their design life" (itself a questionable concept in a Conservation Area) the plans by Maccreanor Lavington do not intend to replace ALL the existing buildings – the 1960s tower will remain. This is almost certainly because the applicants are aware that they would struggle to gain permission for a replacement of a similar height (and therefore density) on the same footprint. Nonetheless the demolition of the tower would be the one possible gain for the Conservation Area from this proposed development and it has not been taken up. This is extremely regrettable.

It should also be noted that, when the tower was built, it was surrounded by open space or relatively low rise buildings at its base (as towers usually were at that period – the surrounding green space being seen as the benefit to be gained from the height and density of the tower). In the current proposal the new nine storey block marches right up to the base of the tower eradicating the gap between the tower and its neighbour which had been part of the original design.

The University is asking Camden for permission to demolish Canterbury Hall (a positive contributor to the conservation area) while retaining the 14 storey 1960s tower block that is NOT a positive contributor. This inconsistency of response to one of Camden's policy documents, which is intended to assist planning decisions within the borough, will set an unwelcome precedent.

Institutional versus residential

The fact that English Heritage supports the planning application and welcomes an "institutional building" with "gravitas" in this location seems to be particularly erroneous, as this particular part of Bloomsbury is NOT an area dominated by academic institutions. It is first and foremost a **residential** area: the majority of people live here, either for a short time (in hotel or student accommodation) or make it their permanent home.

Local residents are rightly dismayed at the perceived attempt by the University to further change the character of the area by creating yet more centralized and institutional accommodation for their students that ignores the intrinsic character of the surrounding streets. Its fundamental urban nature is fine grain. The whole of Marchmont Street to the south and Leigh Street to the east consists of people living above small shops.

The proposal for a single “institutional” building on the east side of Cartwright Gardens is totally out of character with this early nineteenth century urban quarter. The streets were laid out in by James Burton as a **residential enclave**, close to the New Road, (now Euston Road) with open space and local amenities such as shops and public houses. That is the specific historic setting against which the redevelopment proposals should be considered, not the fact that the University has a large number of institutional buildings in the wider Bloomsbury area.

National Planning Policy Framework

We are told that the proposals accord with national policy, as set out in the National Planning Policy Framework.

One of the key dimensions of sustainability is protecting and enhancing our historic environment. [p7] Harm to a heritage asset through development within its setting is assessed against the same policies as for physical harm to the significance of designated heritage assets generally. [p132] So harm should be judged against the public benefits delivered by the proposal. [p133 or 134]

The redevelopment of the site may increase the number of student bedrooms and fulfill NPPF aspirations by providing economic benefits for the University and its investment partner, but we do not see how the proposals produce social gains for the area, indeed we and local residents foresee additional problems with noise and anti-social behavior often demonstrated by many first year students.

Opening up the private open space of Cartwright Gardens to the public could be seen as an environmental gain – but as anyone can play tennis there at the moment, this community benefit is little compensation for a new building that will provide a 9 storey backdrop to the gardens, reducing light to those who wish to enjoy the facility. The proposed removal of two tennis courts may provide greater lawn space for events and picnics, but due to the limited affordable sports facilities in the locality, this is a significant **loss** to members of the community who use the courts.

So what are the real benefits for the local community when weighed against the threat of an over-large scheme and the arrival of 187 more students in an already densely inhabited area of London?

The letter from English Heritage to Camden recommends approval of the University's scheme because, in their view, *“The harm caused to the conservation area by the loss of Canterbury Hall has to be balanced against the potential public benefits deriving from the redevelopment.”* This public benefit is described as *“enhancement to the appearance of the conservation area from a thoughtful design approach that responds to its context.”*

We contend that the actual “public benefits” of this scheme for the surrounding community are very slight when weighed against the actual harm it would

cause. English Heritage make the assertion that this is a 'thoughtful design approach that responds to its context'. Setting aside the niceties of the articulation and materials of the proposal, simply its bulk and height are sufficient to make this assertion completely indefensible.

An alternative design approach rejected because of economic imperatives:

The planning application documents include a Canterbury Hall Analysis Document. This detailed Feasibility Study clearly articulates that to respect its scale as a 'design driver' would limit the opportunities to "densify the site" (page 41). This leads one to conclude that financial viability is taking precedent over heritage concerns, even though the site lies in an important conservation area.

The Study states: "retaining the façade provides ample opportunity to remodel the internal environment", but acknowledges that this would constrain the opportunities to redevelop the entire site and would "dictate that a similar scale of building spaces and structure will be required." (p 45)

Surely this kind of "design driver" would fulfill the obligations of the University and its development partner to **respect**, rather than 'steam-roller' their aspirations over the historic context of the site. If a new building is only acceptable to Camden if it enhances the conservation area, then it should be of an appropriate height and bulk to do just that – it should **enhance not harm** the essential character of the conservation area.

The Analysis Document infers that the retention of Canterbury Hall would mean that the new building would need to be of "a similar scale" to that which exists already and would thus be "at odds with modern best practice." But why should the scale of spaces and structure be so much bigger in a new building? This is precisely the argument that is being made by those of us who oppose the scale and density of the proposed new student accommodation. It is simply far too big.

The University insists that the existing student accommodation does not meet current needs or expectations, which may be true, but the application also increases by 187 the number of student rooms. Ultimately, it seems that the over-large "institutional" structure has been designed to satisfy financial imperatives and attract an 18% increase of students to live in Cartwright Gardens.

In the statement provided to Camden in relation to the recent Site Allocations Document consultation for Site 2 (the Town Hall Extension), English Heritage is clearly concerned that **"the argument for a site's viability for redevelopment may inappropriately override the policy context concerning conserving its heritage interest and that of its surroundings."**

It seems to the Committee that this is exactly what is happening in Cartwright Gardens.

Conclusion:

We strongly urge Camden Council to refuse the University's application for consent to demolish Canterbury Hall and replace this, and the other demolished buildings, with an "institutional" building of such damaging height and bulk. To grant permission to this proposal would be completely counter to Camden's own policy on Conservation Areas and would severely undermine the credibility of its avowed intention to preserve and enhance them.

Yours sincerely,



Hugh Cullum

Bloomsbury Conservation Area Advisory Committee