



Mr McEllistrom
Regeneration and Planning
6th Floor
Camden Town Hall
Extension Argyle Street
London, WC1H 8EQ

14 May 2013

Dear Mr McEllistrom

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

As a long term local resident, I wish to object to the Cartwright Gardens redevelopment proposals. I am a Committee member of the Marchmont Association and a member of the Bloomsbury Conservation Area Advisory Committee but this is personal response to the applications. I am extremely concerned about the negative impact this particular scheme will have on the character of the neighbourhood in which I have lived since 1981.

There have been many (mostly positive) changes to this part of London since I moved to Judd Street in the early 1980s, but its essential character has remained intact. This small quarter of Bloomsbury has retained its 'village' quality, with local shopping streets (Marchmont Street and Leigh Street) and a large number of people who know and communicate regularly with each other. Despite the influx of students and tourists with whom residents share the area, it is – and has always been – a generally happy and well-balanced community.

The decision by the University of London to redevelop the east side of Cartwright Gardens has caused a great deal of consternation among local residents, and although the University has indeed provided plans for people to “comment” on, there is a sense that the opinions of residents are of less concern than the overall objective of increasing the quality and quantity of student accommodation in the area.

The development site lies within the Bloomsbury Conservation Area, one of London’s distinctive heritage quarters, and the danger of destroying its unique setting is considerable.

Camden's Local Development Framework: Development Policy 25: Conserving Camden's Heritage

In DP 25:1 Camden acknowledges that the borough has *"inherited a rich architectural heritage and that these places and buildings add to the quality of our lives by giving a sense of local distinctiveness, identity and history."*

It is my understanding from this policy document that Camden will only permit development within conservation areas that **preserves and enhances** the character and appearance of the area **DP 25 (b)** and that Camden will not permit development that it considers would cause **harm to the setting of a listed building, DP 25 (g)**

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."*

In DP 25.8 we learn 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** (my bold) extent than the existing building."*

The Garden Halls lie on the east side of the Georgian Square that retains the original crescent of dwellings on the western side. They were built as student accommodation in three separate phases (late 1930s, early and late 1960s) so there is an inevitable discrepancy of design. But the fact 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 (if not the students who occupy them) a relatively unobtrusive presence in the neighbourhood.

Although the University's proposal may have a coherence lacking in the existing residential blocks, the design seriously overwhelms the gentle elegance of the crescent opposite and the low rise heritage buildings along Leigh Street and Sandwich Street. The view from Upper Marchmont Street will be of an over-sized civic building of an institutional nature, completely inconsistent with the gentle curve of the Grade II listed late Georgian townhouses opposite.

I would argue that the proposals do not comply with Camden's Local Development Framework (DP 25) and should be rejected.

- The replacement building, due its colossal bulk, does not enhance the conservation area to an **appreciably greater** extent that the existing building.
- The most conspicuous existing element (the 14 storey 1960s tower) is being retained in its entirety – emphasizing **the tower's current incongruity** within a heritage streetscape

- The proposal for a 9 storey 'solid block' along the whole of the eastern side of Cartwright Gardens is totally **unsympathetic** within the context of the Georgian crescent opposite and the other early 19th century houses within the neighbouring streets.
- The proposed development, by virtue of its excessive bulk and height, will **cause harm** to the setting of a large number of listed buildings in the immediate vicinity.

English Heritage's support for proposals

English Heritage's letter of recommendation (dated 26 April 2012) acknowledges the issue of 'impact': *"Because of their scale and design, the new proposals will have an impact on the conservation area and settings of nearby listed buildings."* Their support of the University's scheme appears to be based on the fact that what it proposed is considered, in their opinion, to be "better" than the current mix of buildings on the east side of the square, rather than taking into consideration the **extent** of this impact, i.e. how much the height and bulk of the planned structure will impact on the surrounding streetscape, composed in the most part of four storey Georgian townhouses.

I am also concerned that there is an uncomfortably close connection between the University of London and those in English Heritage who are ultimately responsible for making decisions about development proposals in conservation areas. I note that among the 54 Associate Fellows of the University of London's Institute of Historical Research, 23 of these Fellows list a connection with English Heritage. This includes Dr Edward Impey who is English Heritage's Director of Heritage Protection and Planning and regularly attends London Advisory Committee meetings. I suppose it is hardly surprising that he, and other Associate Fellows, might be in support of the University of London's development plans. I understand from Michael Dunn's letter to Camden (26.4.13) that the proposals were considered at English Heritage's London Casework Conference. Although Michael Dunn is himself not a Fellow of the University, perhaps others who discussed the proposals had a more ambiguous connection.

Retention of the 1960s tower block

Despite the University's insistence that the Garden Halls are "coming to the end of their design life", the plans by Maccreanor Lavington do not intend to replace ALL the existing buildings – the 1960s tower will remain.

I have recently learned (from a planning consultant to the Skinners' Company) that current planning legislation and viewing corridors would not permit a 14 storey structure to be built in this location today. To demolish the tower block would therefore result in a loss of student rooms that could not be replaced. This would have a dramatic impact on the quantity of student accommodation in Cartwright Gardens. I would argue that the decision to retain the tower is not the result of any aesthetic or 'design life expiry' consideration.

Retention of the 1960s Hughes Parry Hall tower, however, provides useful justification for a much higher building along the whole of the east side of the square.

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 façade design, in particular, has an unattractive and uniform treatment that imposes its not insignificant bulk on the whole surrounding area.

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.

I know many local residents who are dismayed at the perceived attempt by the University to change the character of the area by creating 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 – as they have done for centuries. The Edwardian mansion blocks in Sandwich and Thanet Street are full of long term local residents. Likewise, Queen Alexander Mansions and Jessel House in Judd Street, along with those of us who live in the few remaining Georgian houses on the west side of Judd Street.

Although the University of London has acquired a lot of property in the neighbourhood, it does not control it all. Consequently the proposal for an “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 UPP, but I do not see how the proposals produce social gains

for the area, other than 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, it 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?

Demolition of Canterbury Hall

According to Camden's Development Policy 25 (a), the Council will take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas. I therefore question why Canterbury Hall should be demolished, as – according to **Camden's Conservation Area Appraisal** (adopted 2011) – this late 1930s building IS a positive contributor to the conservation area. The interior may be dated but the Cartwright Gardens facade with its art deco features, upper brickwork, stone rusticated base and ground floor render, clearly responds appropriately to the Georgian crescent buildings opposite.

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."*

As a resident who is very concerned about the impact of this redevelopment on the local area, I question the actual "public benefits" of this scheme for the surrounding community, however thoughtful the 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.

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."**

To my mind, this is exactly what is happening in Cartwright Gardens.

I urge Camden Council's Planning Department 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 height and bulk that is inconsistent with Camden's own policy on Conservation Areas.

Please notify me of the date of the Development Control Committee at which these applications will be considered.

Yours sincerely

A solid black rectangular box redacting the signature of Debbie Radcliffe.

Debbie Radcliffe