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Camden Council
Planning department
Attention of Neil McDonald, Planning officer
Sent by email to neil.mcdonald@camden.gov.uk

Original letter 16th Nov 2014
Updated within original text 26th Jan '15

**THE FORMER WEST CENTRAL DISTRICT POSTAL SORTING OFFICE
21-31 NEW OXFORD STREET, LONDON WC1A 1BA**

Proposal: Remodeling, refurbishment and extension of existing former postal sorting office (Sui-generis use), including formation of new terraces, winter gardens, roof top plant and new entrances in connection with the change of use of the building to offices (Class B1), retail/restaurant uses (Classes A1/A3) and 21 affordable housing units (Class C3), along with associated highway, landscaping, and public realm improvement works.

Application for planning permission: 2014/5946/P
16 November 2012

Dear Sirs,

The Bloomsbury Association objects to this application. We acknowledge the positive way that the developer's team engaged with us during the pre-application stage. We feel that our comments on the emerging proposals were listened to and some changes have been made as a result that are reflected in the submitted proposal. However, the issue of height and bulk still remains a major concern, a concern that we share with our members and neighbours in *Bloomsbury*, Covent Garden and Soho. Although there have been some improvements along the way, the outcome is not something that we feel we can support. The comments that follow are not entirely negative and are along the lines of what the developer's team has already seen in our responses to earlier discussions.

1. Vision

We were hoping that we would have been uplifted by what the public exhibition in April described as "a striking new space of high quality architecture...". We are disappointed. It could well be a function of our negative planning system or, indeed, of the expectations of the local community but the huge development potential of the site and the opportunities to reflect this in something that is radical, challenging and, yes, 'striking' seems to have been watered down to a degree of mediocrity and blandness that the West End does not deserve. The developer has a good team but it is not telling an entirely convincing story. It is a proposal that looks to tick all the planning boxes but adds little to the urban potential of the existing building or to the public realm. We have urged the development team to think out of the box, think exciting and think radical yet this is not the memorable addition to the transitional space between Bloomsbury and Covent Garden that it could be.

We were particularly disappointed by the project 'vision' – and this is both a criticism of the development brief and the Council's planning brief. There has been much discussion of embracing the synergy of Mail Rail and of a direct West End connection to the Postal Museum at Mount Pleasant but it is not part of the vision. Similarly, any synergy offered by the proximity of the British Museum and the mothballed Museum Underground station is excluded from the ideal dream. These all offer huge potential for cultural and tourist related uses at ground level and below that would attract far more footfall than off-pitch retail units of dubious viability.

Indeed, such uses would probably be the commercial catalyst that would make all the remaining accommodation at street level work.

This effect could be magnified if there was buy-in from adjoining owners to transform New Oxford Street to either a pedestrian priority or, ideally, a vehicle free environment to create an area that begins to have its own character and identity apart from its neighbours while, at the same, time serving to better link them. Sicilian Avenue and More London offer close parallels, albeit at different scales. Again, the vision ignores this exciting possibility to enhance the public realm on a grand scale and seems to be distracted from it by nit-picking detail of highway engineering and dull hard landscaping on Museum Street.

We would like to see a convincing business plan as part of this vision: mixed-use, city scale developments such as this cannot just be packaged in architectural wrapping paper in the hope that this alone will encourage support. The success of this project relies on more than the provision of large floor plates unique to the West End. It has to stitch itself back into the urban fabric from which it had been dislocated for more than 30 years and this is an exercise in urban design as much as it is an exercise in crafting a new envelope around an empty shell.

There are many common issues that this proposal shares with Commonwealth House: bulk and massing, streetscape, viability of street level uses, residential content, servicing, Dunn's Passage and, foremost, a shared vision. We would have liked to see a demonstrable commitment by Brockton, Henderson and Camden to this approach.

2. Use

We welcome the inclusion of housing on-site. We would have preferred to see a greater quantum of floorspace allocated to residential use but in a different location within the development. We feel that lower traffic noise levels have to be balanced against limited sunlight and a frontage to New Oxford Street or a rooftop location would be far better locations for residential use.

We welcome the introduction of active uses on the street frontages. However, we are sceptical of the viability of the proposed retail use. A wider conceptual definition of 'retail' space is needed that embraces the rather conservative definition of the A Use Class but, is more open-ended to encourage the type of eclectic mix of uses that have been suggested: part cultural, part exhibition, part studio, part workshop, part community, part museum and part market. By the latter we mean something akin to Camden Market, Covent Garden Market, Gray's Antiques on Davies Street, Spitalfields Market or even La Grande Epicerie de Paris. It is a big space and it can support big ideas and a far richer variety of uses than those proposed.

Update: 26 Jan 2015: *We welcome the updated proposal to include D1 (GP surgery) but 300sqm is not sufficient to satisfy the serious shortage in the area.*

While we are not so adamant about the suggestion of publicly accessible open space or a roof garden, in such a large building there are clearly opportunities in relating street or roof space to commercial space and in extending ground level uses through the building. We acknowledge that their high management costs require a sound commercial use to sustain them.

Nevertheless, there are numerous successful precedents: Paramount at Centre Point, Covent Garden piazza, the former Derry & Toms roof garden in Kensington, Coq d'Argent, John Lewis, Selfridges and even the Great Court at the British Museum. Given the will, it can be made to work. There are magnificent views so, in terms of use, the fifth elevation of this proposal could have been a more memorable contribution to the city's roofscape.

Museum Street has potential for an 'anchor' at each end - not only a visual anchor but also in terms of use. Indeed, 21-31 New Oxford Street has potential to be pivotal in also anchoring Drury Lane. We welcome the proposed office entrance from Museum Street and the extension of the red line application boundary but are street level uses and the hard landscaping proposal on Museum Street robust enough to fulfill this role 24/7? To this effect, there has been engagement with Travelodge but we would have liked to see a better relationship with the block on West Central Street.

3. Bulk and massing

We endorse Covent Garden Community Association's view that the proposed massing of the building is too heavy and bulky particularly where it is most visible at the northern corner of Museum Street. This is compounded by its height – an additional three stories increases the height of the existing building and pushes the new building right up to the street frontages, which makes the increased height even more prominent. Taken together, the increased massing and height reflect a 50% increase in floor area, resulting in an overdevelopment of the site that severely damages the setting of the two conservation areas, as well as the listed building in the immediate vicinity. Instead of complementing the character of the two historic neighbourhoods in which it sits, the proposed development over-reaches and conflicts with the local area and is clearly in conflict with Policy DP25.

Update 26 Jan 2015: *We acknowledge that the applicant has refined the design which is certainly an improvement on the previous design (including the corner of the building with Museum Street and New Oxford Street). However, we are still unable to offer support for the development due to its height and bulk, this being regarded as overdevelopment.*

The decision only two months ago by the Council to refuse the redevelopment of the block opposite bounded by Museum Street, West Central Street and New Oxford St relied on the fact that the size of the proposal would be damaging to the two neighbouring conservation areas. To grant consent to the current proposal for 21-31 New Oxford Street, when the proposed development is considerably more damaging, would be entirely inconsistent and set a precedent that probably will lead to a sequence of other over developments. It will certainly completely undermine the Council's position over the West Central Street block.

Camden's detailed planning brief which, although dated still has material planning relevance, observes that "the primary objective is to ensure that any development on this site delivers a quality and innovative sustainable design that also enhances the character of the adjoining conservation area" (emphasis added; section 7.1, p. 19). The current proposals, with their significant addition of bulk and height, do not achieve this. A building of this proposed height has a detrimental impact on the strategic skyline, the relationship to the British Museum and Centre Point (both listed buildings), and on local views and building relationships. Thus, the building's design must be more modest, reflecting the neighbourhood in which it sits.

Update 26th Jan 2015: *Much work has been done on the skyline profile and the articulation of the corner that terminates the view along Museum Street. The result is an improvement to what we saw earlier but the issue of the overall mass and height of the building and its impact on the sensitive scale of Museum Street still remains, as is clearly evident from the CGIs.*

4. Architectural expression

The architectural expression of the building is too well mannered, too grey and too monotonous. It is all too bland and needs enrichment. It may have quality and articulation close to but that is all lost in distant views where it still appears inarticulate and bulky – it still looks a big block that is inappropriate for its context.

We are happy with the contemporary approach that has been taken to the expression of the building's envelope. We have suggested that north and south facing facades should have different treatment to reflect their differing orientation and this seems to have been incorporated in the proposal. We feel that the long facades should have more articulation into vertical bays to reflect the urban grain of the conservation areas that they adjoin. This is particularly appropriate for parts of the facade seen more in straight elevation rather than obliquely, such as in the views along Museum Street.

We welcome use being made of the industrial heritage remaining inside the building where its unique fittings and equipment are conserved for incorporation within the building as interior features. If they are under threat of removal, we have suggested that consideration be given to the building's listing.

5. Streetscape

A synergy needs to be explored in both commercial and urban design terms for the space shared with the building's neighbours. The space on Museum Street has been addressed but

New Oxford Street, where we believe there is far greater potential, is still work in progress. A more adventurous approach to place making is encouraged.

Update 26th Jan 2015: Streetscape - *We urge the Council to incorporate the recommendations made by Colin Davis into any S106 agreement. We believe the design approach used will greatly enhance the streetscape at the junction between Museum Street and New Oxford Street and provide more safety for pedestrians and less frantic traffic flows. If funding permits we ask Camden to consider the improvement proposed for Museum Street North and Princes Circus (North side).*

We welcome the opening up of Dunn's Passage and the other improvements suggested to street crossings. However, Dunn's Passage must not end up like Hanway Place where vehicle servicing has totally destroyed its urban qualities.

For these reasons we urge the Council not approve the current application. We would be grateful if you would let us know of any further modification to the application before it is decided.

Jim Murray

Chairman
Bloomsbury Association

Copies to:

CGCA

Seven Dials Trust

BA Committee

H&CG ward councillors

Bcc to:

West Central Street residents

Grape Street residents

South Bloomsbury R&T Association