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Planning Department  
Camden Council  
2nd Floor, 5 Pancras Square  
c/o Town Hall, Judd Street  
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WC1H 9JE  
ATTN: Mr. Neil McDonald

**By email and post**

[Neil.McDonald@camden.gov.uk](mailto:Neil.McDonald@camden.gov.uk)

**RE: 21-31 New Oxford Street WC1, 2014/5946/P**

Dear Mr. McDonald,

I am writing to you as I understand that you are the new planning officers dealing with this application; revisions were recently submitted and the CGCA has the following comments.

1. The changes in the elevation treatment have not seriously addressed the overdevelopment of the site, so our previous critical comments about the size and bulk of the development remain. We are very concerned that the development will seriously damage the setting of the numerous listed buildings near to the site, not least the two Grade 1 listed buildings, The British Museum and St George's Church, and seriously damage the quality of the adjacent conservation areas that surround the site. Not to turn down the application as currently designed would be completely inconsistent with the recent decision by the Council to refuse the proposed development directly opposite the site, West Central Street/New Oxford Street/Museum Street (see planning reference P00257111).
2. The developers have not seriously addressed the almost universal objections concerning the height and bulk of their scheme; changes that are being proposed merely tinker with the original submitted scheme rather than fundamentally reduce the bulk and height of the proposed building. Moreover the development seriously damages the daylight and sunlight penetration into the existing residential accommodation in Museum Street and nothing in the revisions addresses this defect.
3. The proposed rooftop tiered hard-surface terracing is not public open space as required under Camden's Planning design requirements and the limitations as to times of opening applying to access renders the open space a token – there should be approximately 3,000 sq.m. of public open space, whereas what is now suggested is 336 sq.m. - which is just over 10 percent of what Camden's policy requires.

**Covent Garden Community Association, continued...**

4. The inclusion of 300 sq.m. of D1 use is welcome, but as the planning brief for the site calls for at least 100,000 sq.m., clearly it is again a token and does not seriously address the need to provide sufficient D1 space (to quote Camden's own brief) "The Council will seek to secure the retention and reuse of the D1 parts of this site for social and community purposes." This brief was adopted in 2004 and recently endorsed and included in the more recent development site description. Moreover, a GP group practice will require at least 600 sq.m. and the use should be legally protected by a condition that the rental cannot be higher than with NHS public practice rental levels, otherwise there is no assurance that a NHS surgery will be able to afford space in the building.
5. The revisions have not increased the provision of more affordable housing: the developers have not significantly changed the quantity of housing on the site since the first submission. The disparity in floor area between the proposed new speculative offices - 35,568 sq.m. which is circa 383,000 sq. ft - and new "affordable" housing at 3,530 sq.m., which is circa 38,000 sq. ft. - speaks for itself. Camden's brief calls for a very significant housing gain and maintains that the housing should be sited at roof level. On both counts the latest revisions fail. Indeed, the developers' housing is located on the busiest and most polluted of all the roads that surround the site and the entrance to the housing has two service roads/entries on either side.
6. There still is no designated cultural use proposed; the suggestion that 350 sq.m. of the proposed 4,100 sq.m. of proposed retail space, i.e. less than 10 percent of the huge retail space being proposed, will be earmarked for small traders should be seen for what it is - pure tokenism and clearly does nothing to address the many calls for the retention of gallery and performance space.

To grant consent to this gross proposal would be a travesty. We urge the Council to reject the application.

Yours sincerely,



pp Elizabeth Bax  
Chair, Covent Garden Community Association Planning Sub-Committee  
On behalf of the CGCA