



87 GOWER STREET
LONDON WC1E 6AA

PROPOSAL: Demolition of existing rear structure at ground floor level and erection of single storey rear extension, new access to basement level and cycle storage within existing front vault, all to office (Class B1a)

Application for planning permission reference: 2019/3564/P

Application for listed building consent reference: 2019/4081/L

7 September 2019

The Bloomsbury Association objects to these applications and wishes to make the following comments.

1. Building on the garden of 87 Gower Street is an intensification of use that will have an adverse affect on the amenity of residents in 68-74 Chenies Mews whose windows face the garden and are only 2m away from the proposed extension. The impact of the proposed development on neighbours' amenity would be harmful and its storey-height glazing could result in significant light pollution during winter months.
2. The proposed development, a rear extension to a Grade II listed building, lies within the Bloomsbury Conservation Area. The proposed extension does not enhance the character or appearance of the conservation area and, by extending almost fully into the garden, is damaging to the setting and architectural and historic interest of the listed building, contrary to Policy D2 of the Local Plan.
3. The rear extension to 91 Gower Street (shown on the Massing Diagram 0505 2 D which accompanies the application) is not a reason to justify a similar rear extension on the garden of 87 Gower Street. The extension of 91 Gower Street has a rear entrance via its own car park which is on Chenies Mews. Furthermore the rear extension of 91 Gower Street was built during a very different era when differing planning policy applied. It should not be regarded as a valid precedent.
4. There is no alternative egress from the proposed extension making it difficult to evacuate the deep ground floor plan in an emergency. Whilst means of escape in case of fire and compliance with Requirement B1 of the Building Regulations is not a planning matter; resolving it could require alterations to the current proposal that could be an issue for the parallel application for listed building consent. This does not appear to be considered in the application.
5. The drawings attached to the application are not sufficiently detailed in their content, in their description of alterations to the existing building and materials used in the extension to be considered appropriate for an application for listed building consent.
6. We have particular concerns about the potential for damage to the protected lime tree in the adjacent garden to 89 Gower Street, described as T1 in the Arboricultural Report accompanying the application. The report's conclusions are not encouraging in stating: "In summary, there is a risk of a development proposal having an adverse impact to existing trees both above and below ground. Any design proposal should take the presence of T1 into consideration and its likelihood of being directly impacted on by a development proposal,

especially below ground." No structural assessment and no details of the proposed substructure are provided. Furthermore the proposal offers no consideration of the potentially damaging impact of new substructure and drainage works within the root spread and how to mitigate them.

The argument for retaining such a tree is presented in several published documents. Your attention is drawn to *The Case for Trees* in Section 3 of the Council's *Strategy For Managing, Maintaining and Replacing Trees*. This defines the Borough's approach to the management of Council owned tree stock to ensure that it maintains and increases tree cover. It also stresses the importance of trees for air quality, microclimate, aesthetic and social benefits, environmental factors, sustainability, climate change and biodiversity.

In 2008 the Government commissioned *Trees in Towns II* report was released, some 15 years after the original *Trees in Towns* survey. It is a troubling read. The indications are that overall canopy cover in our towns and cities has decreased, England's Victorian legacy of large trees is disappearing without replacement and trees are still languishing somewhere near the bottom of the local government agenda. *Trees in Towns II* seems to suggest that our urban forest is falling short in providing these functions, and that we are in fact seeing a slow decline. Trees are still not given the protection they need in the face of so many pressures, despite notable improvements to TPO legislation and best practice guidelines such as BS 5837.

The deterioration of the urban forest between the last survey in 1992 and the survey reported in 2008 shows that there really is no time like the present. We have already missed a generation's worth of chances to create a really robust population of urban trees and enjoy their benefits. Perhaps the consequences of our ageing Victorian tree stock were not realised early enough, nor the potential for trees as a buffer against the consequences of climate change and rapid urban development sufficiently well apprehended. We cannot unmake the past, but we will not be forgiven by posterity for missing another opportunity. The thrust of *Trees in Towns II* is that we need a bit of order, and specifically some systematic strategies for urban trees that involve all those that live and work in and manage our towns and cities, and that we need these measures as soon as possible.

We hope that the Council will act in accordance with the objectives that it and central government have set for this quintessential example of the urban tree and respect the views of local residents. We are encouraged by its statement that "*The Council is committed to the effective management of its tree stock, to the conservation of existing tree cover and its increase*" and hope that action will now reflect words and this tree's longevity be safeguarded.



7. If Officers were minded to recommend approval of these applications in principle, we suggest that the flat roof is "greened" by sedum planting or similar with accompanying conditions that the flat roof is neither to be used for locating air-conditioning plant nor be accessible as a break-out space for office staff, thereby causing a further disturbance to neighbours.

The Association supports good quality design that will enhance the streetscape of Bloomsbury and Fitzrovia and endorse the objection to this proposal by the Chenies Mews Working Group. We look to the Council to seek amendments or refuse this application for the reasons stated above.

We would be grateful if you would let us know of any further modification to the application and the decision, if it is to be determined under delegated powers.


On behalf of the Bloomsbury Association

Copies to:


 London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Chenies Mews Working Group
Fitzrovia Neighbourhood Association
Chair, Bloomsbury Association