



**BLOOMSBURY
CONSERVATION AREAS**
Advisory Committee

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bloombsurylives.co.uk

5th December 2019

Mr Ben Farrant
The Planning Department
5 Pancras Square
King's Cross
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N1C 4AG

Opposition to Planning Application 2019/5214/P, Extension to Premier Inn, 1 Duke's Road WC1H 9PJ.

The BCAAC is the advisory committee for all developments in Camden occurring within conservation areas south of Euston Road, with the exception of Hatton Garden. This development concerns the Premier Inn, part of which falls within the northern border of the Bloomsbury Conservation Area.

The current building significantly negatively detracts from the setting of the Bloomsbury Conservation Area and the listed buildings contained therein. It particularly affects the setting of the Grade I listed St Pancras New Church, an heritage asset of high significance, the second most expensive ecclesiastical building in London after St Paul's Cathedral (at the time of construction).

The current building is of a scale inappropriately large for the setting of the neighbouring St Pancras New Church and the Bloomsbury Conservation Area. An extension would only exacerbate the matter.

We believe that the development will cause harm but less than substantial harm to local heritage assets. 194 of the NPPF states that any harm to the significance of an heritage asset should require clear and convincing justification. We have not however found any justification in the application, nor a proper assessment of the harm it will cause.

The argument given by the developer is that the current building is already so inappropriate that making it even larger can only preserve and enhance the special character of the conservation area, by 'refreshing' the appearance of the building.

We would like to draw your attention to 191 of the NPPF which states that the deteriorated state of an heritage asset should not be taken into account in determining applications. The fact that the current building has deteriorated the setting of local heritage assets should not be accepted as a cause for further damage to the setting of the Bloomsbury CA and its heritage assets.

It should be noted that nowhere in the application is it explained exactly how the development will preserve or enhance the *special character* of the Bloomsbury

Conservation Area, despite a large extension being built within its boundary. We would like to remind you that the Bloomsbury Conservation Area is a CA of national importance, being designated originally in 1967. Despite this, the Heritage Statement seeks to justify why such considerations are unimportant.

It should be noted that 6.3.1 of the Heritage Statement Part I claims that the Bloomsbury CA Appraisal is outdated and is '*no longer a true reflection of the current status of the area*', thereby attempting to undermine its importance.

It should also be noted that 6.3.6 of the Heritage Statement Part I states that '*Former later 20th century buildings to the east side of Cartwright Gardens, to the southeast of the Site, discussed within the Conservation Area appraisal document (2011) have been recently replaced by One Cartwright Gardens; a large eight to nine-storey complex, out of scale with, and dominating views within, the crescent of Grade II listed former housing.*' This is evidently an attempt to portray lack of regard to nearby heritage assets within the planning department. It should be noted that the extension will be visible from Cartwright Gardens, but no visual impact assessment has been made from that site.

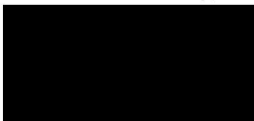
There are no visual impact assessments from the Bloomsbury CA despite its highly sensitive setting. We would expect to see a views assessment from positions within the CA such as the nearby Cartwright Gardens.

The applicant has simply sought to undermine the importance of the Bloomsbury Conservation Area and its heritage assets, and point to inconsistencies in Camden's approach to heritage assets in order to convince the department that they should allow this development to go ahead without any consideration of the harmful effects it will have on significant heritage assets.

The fact that the development is occurring on the border of the Conservation Area does not mean that it is exempt from proper impact assessments.

We recommend that this application is rejected.

Yours Sincerely,

A black rectangular box redacting the signature of Owen Ward.

Owen Ward