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2019/6451/P

Edward Ottewell 5 Pancras Square King's Cross LONDON N1C 4AG

Objection to 2019/6451/P, for the application for modifications and the use of the public highway for business purposes, associated with 2x telephone kiosks, Russell Square.

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 application concerns two telephone kiosks at the south-eastern corner of Russell Square, in the Bloomsbury Conservation Area.

The Bloomsbury Conservation Area is a conservation area of international importance, and Russell Square is a Grade II listed square that forms an integral part of Bloomsbury's special interest. The two telephone kiosks concerned are Grade II listed, the design of these kiosks being of international renown and interest.

The use of these kiosks for business purposes we already find to be entirely inappropriate, but the proposed modifications to the kiosks essentially erases the special appearance of these Grade II listed assets. We feel that the modifications would cause them substantial harm.

We also take particular issue with the use of the public highway outside these kiosks for further business purposes. The vendors are known to take up an inordinate amount of space and clutter the public highway with their wares and advertisements. Once permission is granted for any use of the public highway whatsoever, it leads to a runaway effect where vendors over time expand their boundaries, with no powers to enforce against it. Fig. 1 shows an example of this occurring at the north-eastern corner of Russell Square.

In our opinion, the use of the public highway in this manner causes substantial harm to the setting of the Grade II listed telephone boxes, whilst also causing less than substantial harm to the Grade II listed Russell Square, and the Bloomsbury Conservation Area.

We therefore feel that the application fails to fulfil Policy **D1** and **D2** of the Camden Local Plan. The advertisements that will no doubt come with an approval of the application will most likely fail to fulfil Policy **D4**. In our opinion, the harm that would

be caused to the setting of the designated Russell Square would also fail to fulfil Policy ${\bf A2}.$

We would like to remind you that in the case of substantial harm being caused to a designated heritage asset, it must be demonstrated by the applicant that the substantial harm is necessary to achieve substantial public benefit, and that the public benefit should outweigh any harm caused. The modifications to the kiosks and the use of the public highway for business purposes does not carry any public benefit, in our opinion. It is certainly not substantial.

We would also like to remind you that substantial harm to a Grade II listed heritage asset should be exceptional.

We therefore recommend that this application is rejected.

Yours Sincerely,



Owen Ward

FIG. 1

Unacceptable harm caused to the setting of the telephone kiosks, Russell Square (north east), and the Bloomsbury Conservation Areas

