

247 TOTTENHAM COURT ROAD

WITH 3 BAYLEY STREET; 1, 2-3 AND 4 MORWELL STREET, LONDON WC1T 7QZ

REQUEST FOR EIA SCREENING OPINION

Application: 2020/3082/P

18 July 2020

The Bloomsbury Association, Charlotte Street Association and Fitzrovia Neighbourhood Association wish to make the following comments on the EIA Screening Report by Avison Young, dated 10 July 2020. This has been submitted in support of a forthcoming planning application and seeks to inform the Council of some of the issues to be considered in producing a screening opinion. It is not proper for us to comment on that process but, with local knowledge, we would like to highlight issues that appear to be relevant considerations but are unreliably informed by what appears to be a lightly researched desk-top study with significant errors and omissions. These issues are equally relevant to consideration of the forthcoming planning application and the information upon which it is assessed should be accurate, reliable and consistent.

In describing other relevant information, including features of the development or any measures envisaged to avoid or prevent what might otherwise result in significant adverse effects on the environment, we feel that the construction process to implement the development and its impact on local residents and businesses should be a key consideration. This is particularly so for access and egress from the site during the demolition and construction stages, which we see as potentially the major impact on the local environment.

Item 3.4 of the Report describes the location of the site in relation to the Bloomsbury Conservation Area and the Charlotte Street Conservation Area. It omits mention of the Hanway Street Conservation Area. Its proximity to the heritage asset of Bedford Square should also be borne in mind.

Bedford Square was built between 1776 and 1780 for the Duke of Bedford. It is considered one of London's finest and best-preserved historic squares and is the only intact Georgian square in London. It was the first garden square with an imposed architectural uniformity that set the style for garden squares in London through the late 18th and early 19th centuries.

To reflect its importance, all of Bedford Square's 54 buildings are Grade I listed and English Heritage defines Grade I buildings as being 'of exceptional interest, sometimes considered to be internationally important'. The gardens have a Grade II* listing on the English Heritage Register; all its later gas lamps are Grade II listed, as is the garden pavilion. The meticulous design of Bedford Square reflects the classical tastes of 18th century England for coherence and consistency in urban planning and city-scale architecture.

The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. The Plan's policies seek to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. This recognises that asset value is more than the fabric of the Square's buildings but in the spatial quality of the space that they define and the approaches to, from and within it.

For this reason, in 2000, with substantial funding from Bedford Estate, English Heritage, Crown Estate and the London Borough of Camden, its public realm underwent careful refurbishment to reflect the asset value of its heritage. Camden has an ongoing responsibility to safeguard the historic assets in its care and that should include precluding its use for access and egress to a large construction site over a period of some three years.

Items 4.1 and 4.3 of the Report are incorrect. Car parking is provided on the site. Also, since the

implementation of the Council's West End Project, there has been no vehicular access to the site from either Tottenham Court Road or Bayley Street.

Item 4.2 of the Report is incorrect and potentially misleading in its description of adjacent land uses and their geographical exactitude. Bloomsbury Street, for example, is not to the north and educational and hotel uses, so dominant in the area, are not even mentioned, nor is the British Museum. We suggest that reference is made to the Council's Fitzrovia Area Action Plan for a more thorough description of context.

Items 4.3 - 4.6 of the Report do not acknowledge the location of TfL cycle docking stations in proximity to the site.

Item 4.7 of the Report does not acknowledge the primary school in Bedford Square; item 4.7 does not acknowledge the secondary school in Russell Square. There is no mention in this section of higher education facilities including the University of London, UCL, University of the Humanities and the Architectural Association School of Architecture on the eastern side of Morwell Street.

Item 4.10 makes no reference to the public open spaces being created on Bayley Street, Bedford Avenue, Windmill Square and Alfred Place as part of the Council's West End Project.

Item 4.13 incorrectly identifies the Grade I listed terrace of 28-38 Bedford Square and also MyHotel at 11-13 Bayley Street. Item 4.14 omits to mention educational and hotel uses.

We disagree with the assertion made in **4.15** that "The Site is not covered by any planning policy designations relating to townscape value". The statement ignores the importance of the adjoining Bloomsbury, Charlotte Street and Hanway Street conservation areas. The extent of both the Charlotte Street Conservation Area and the Hanway Street Conservation Area is incorrectly shown on **Figure 7**. The extent of Grade I listed buildings on Morwell Street is also incorrectly shown.

Items 4.30 and 4.38 of the Report state that there is no evidence of the site being subject to direct bombing. Tottenham Court Road and Bayley Street are recorded as being hit by high explosive bombs between October 1940 and June 1941. The adjoining building, now known as One Bedford Avenue, was hit, as was the YMCA. Buildings opposite, on the western side of Tottenham Court Road were destroyed.

Item 4.35 of the Report acknowledges that the main source of noise is from vehicles servicing all uses, not just retail. The major source of noise emissions is from coaches and trucks serving the St Giles Hotel, to the immediate south of the site. These, together with all other local service traffic, will be routed northbound along Morwell Street as part of the Council's West End Project, which will make the noise climate on Morwell Street worse. The same is applicable to **item 5.64, 5.70, 5.73 and 5.108** of the Report.

Item 5.3 of the Report is incorrect in concluding that "that no Cumulative Schemes exist within this geographical area". We refer the Council to Crossrail works, HS2 works, West End Project works, St Giles Square and the construction of a new 200+ room hotel beneath the block bounded by Tottenham Court Road, Great Russell Street, Bedford Avenue and Adeline Place. In addition, there are major ongoing street utility infrastructure works by gas and internet service providers.

Currently there are ten live construction sites within the immediate area bounded by Bedford Square and Bloomsbury Street to the east, Bedford Avenue to the south, Tottenham Court Road to the west and Bedford Square to the north. It is acknowledged that some are small but the cumulative effect of material deliveries, waste collection and power tool usage is significant for those living, working or studying in the area.

Item 5.4 of the Report somewhat glosses over what will be a key issue to be resolved during both the demolition and construction stages of the project. We would like to see a separate draft DMP and CMP submitted with the application and we would expect to see these upheld in discharging s106 obligations.

Any proposal for Bedford Square, a sensitive historic environment, being used for site access and egress during the demolition and construction stages will be resisted. Construction traffic should not use the north side of Bedford Square to gain access to/from Gower Street. Likewise Bedford Avenue, which is a predominantly residential street, should not be used to gain access to/from Bloomsbury Street.

The construction of One Bedford Avenue was achieved with site access and egress entirely to/from Tottenham Court Road, via Morwell Street, which we would like to be explored again. This is likely to be resisted by TfL and Camden's West End Project team but, given the period of construction and other sensitivities, is the only reasonable solution. An alternative might be access and egress from Tottenham Court Road via Bayley Street alone.

Whatever access route is adopted, it is likely to impact on the yet to be realised 'pocket parks' proposed as part of the West End Project for the closed junctions of Tottenham Court Road with Bayley Street and Bedford Avenue.

Item 5.6 - 5.8 and Table 1 of the Report are incomplete and an unsound basis to reach any conclusion.

No mention is made of the Council's West End Project which is driven by TfL's ambition to operate two-way traffic on both Tottenham Court Road and Gower Street / Bloomsbury Street and to partly restrict the use of Tottenham Court Road to buses and cycles at certain times. Bayley Street and Bedford Avenue are to be closed at their junctions Tottenham Court Road, except for cycles. Bedford Square (north) will be one-way eastbound and Adeline Place one-way southbound. As a result, all traffic generated by uses on the east side of Tottenham Court Road, between Great Russell Street and Store Street will have to approach from Bloomsbury Street, westbound along Bedford Avenue to Morwell Street and depart eastbound along the north side of Bedford Square.

Table 1 indicates that, while the total number of trips is reduced, the number of trips related to servicing and delivery increases by 30%. These will be trucks and vans, vehicles with greater noise and exhaust emissions than the cars currently using the existing development. The assessment should also include cumulative effect by adding the increased service and coach traffic anticipated on Morwell Street as a result of the West End Project.

For these reasons we disagree with the conclusion made in item 5.7 that "the Development is unlikely to give rise to significant vehicular traffic effects."

No mention is made of the existing TfL cycle docking station on Bayley Street or the proposed docking station on Adeline Place.

Items 5.4, 5.9, 5.2, 5.32, 5.4, 5.50, 5.56, 5.67, 5.76, 5.97, 5.104 and 6.4 of the Report should also include a Demolition Management Plan and a Construction Management Plan in their recommendations.

Item 5.10 of the Report concludes that "The Works will have no direct or indirect effect upon core social infrastructure in the area including primary school, secondary school and healthcare provision" We disagree. Educational facilities could be severely affected during the construction stages, as could the viability of adjoining retail uses. During the construction stage of One Bedford Avenue there was a reduction in footfall on Tottenham Court Road north of the site. The construction period coincided with Crossrail works and with Tottenham Court Road station being closed and the cumulative effect was significant. A number of businesses closed. In these fragile economic times, there may be similar parallels here with the demolition and construction stages of 247 that need to be understood and managed to minimise cumulative impacts on the wider area.

Item 5.15 of the Report reaches different conclusions about the adequacy of public open space to that of the Fitzrovia Open Space Report accompanying the Council's adopted Fitzrovia Area Action Plan.

Items 5.21 and 5.87 are incorrect in stating: "the Development proposes no increase in the existing massing". The Consultation Pack issued to us describes 'a modest increase'.

Item 5.64 is incorrect, for the reasons given in 5.6-5.8 above, in concluding that "the overall traffic volumes and flows on the local road network are unlikely to be materially different to that of the existing situation. As such, the Development is unlikely to give rise to significant changes to vehicular traffic emissions and associated effects to ambient air quality." There will be a significant environmental impact on existing uses on Morwell Street, Bedford Avenue and Bedford Square from vehicles both during the construction works and on completion. It is misleading to conclude otherwise.

Item 5.77 of the Report refers to existing wind tunneling effect and concludes that "the existing Site is unlikely to be subject to any uncomfortably windy and potentially unsafe wind conditions" We disagree. There are severe wind tunneling effects around the Met Building at the corners of Percy Street, Windmill Street, Bayley Street and Tottenham Court Road to the extent that it is often uncomfortable and sometimes unsafe for pedestrians. We therefore question the conclusion made in item 5.78 and 5.79 and that no recommendations are applicable.

Item 5.94 of the Report states: "Works associated with the Development are unlikely to give rise to significant waste effects", which appears an odd rationale when all the existing buildings are proposed to be demolished. This will give rise to substantial not 'minimal' waste creation.

Item 5.104 should include noise and dust level monitoring during demolition and construction.

Item 5.105 et seq. is not a sound assessment. It should include reference to Stiff + Trevillion being signatories to *Architects Declare*, a network of architectural practices committed to addressing the climate and biodiversity emergency. It should then elaborate on how the low carbon ambition for this project relates to *Architects Declare's* agenda to "Upgrade existing buildings for extended use as a more carbon efficient alternative to demolition and new build whenever there is a viable choice".

Item 5.113 concludes "it is unlikely significant environmental effects will result from the implementation of the Development, or from the operation of the completed Development, it is unlikely that there will be any potential for significant cumulative interactions to occur." Again, we disagree for the reasons satiated above against item 5.3. Mindful that the site is located in an area identified for intensification of use, the potential for the cumulative interactions of the Development in isolation upon a particular receptor or set of receptors should be considered. These should include adjacent residential, hotel, educational, consular and business uses.

Section 6 deals with conclusions and recommends: "Any environmental effects associated with the Development are unlikely to be significant and can be adequately dealt with via the normal planning application process. As such, the Development is not considered to constitute EIA development."

Given the comments above, we are sceptical that such a conclusion can be reached with any authority but concur that the forthcoming planning application will need to be supported by a suite of environmental technical studies to address the issues raised.

Much emphasis is given in the Report to safeguarding the habitat of an unproven bat population. By comparison, there is little consideration of measures to be taken to safeguard human habitat known to be evident on Morwell Street and Bedford Avenue, an imbalance we suggest that needs to be addressed in going forward.

Bloomsbury Association | Charlotte Street Association | Fitzrovia Neighbourhood Association

Copies to:

David Hutton, CO-RE
Duncan Hepburn, London Communications Agency
Avnesh Modhvadia, London Communications Agency
Laura Hazelton, London Borough of Camden
Board of Directors, Bedford Court Mansions Limited
Steward, The Bedford Estates

John Davies, Derwent London
Anita Pfauntsch, Architectural Association
Charles Lawrence, Ashby Capital
Clive Henderson, Charlotte Street Association
Linus Rees, Fitzrovia Neighbourhood Association
Chair, Bloomsbury Association