

Charlotte Street Association

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**Development Management,
Regeneration & Planning,**
London Borough of Camden,
Town Hall, Judd Street,
London WC1H 8ND.

26th September 2020

For the attention of Laura Hazelton, Planning Officer.

By email to: planning@camden.gov.uk and laura.hazelton@camden.gov.uk

Dear Laura Hazelton ,

**Re: ref. 2020/3583/P: 274 Tottenham Court Road;
and 3 Bayley Street; and 1, 2-3, and 4 Morwell Street, WC1T 7QZ**

Demolition of 247 Tottenham Court Road, and 3 Bayley Street, and 1, 2-3, 4 Morwell Street, and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works.

I am writing on behalf of the Charlotte Street Association, concerning the above planning application.

We wish to object to, and make comments on, the proposals, for the reasons set out below.

Along with the Bloomsbury Association and the Fitzrovia Neighbourhood Association, I attended, on behalf of the Charlotte Street Association, an on-line zoom meeting in July with the developer's team including their architects. Although my on-line connection was not very good, I put forward some of our comments and objections, and particularly our concerns about the scale and bulk of the proposals relating to Morwell Street.

(I did also try to attend the earlier first zoom meeting, but I was not able to take part because the computer I was at did not have sound.)

1. Scale and bulk:

The height and bulk of the proposed building is the same for both Tottenham Court Road and for Morwell Street. We wish to strongly object to this treatment. The bulk and scale is more suited to the scale of Tottenham Court Road. But this bulk and scale is not appropriate to the smaller scale and narrowness of quiet Morwell Street; there needs to be a more appropriate architectural response to Morwell Street.

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2. Sections:

- (a). This issue with the scale can clearly be seen in the Sectional drawings, comparing the Existing cross-sectional Sectional drawings with the Proposed cross-sectional Sectional drawings.
- (b). Many of the existing Morwell Street buildings (which are proposed for demolition) are of 3- and 4-stories, which suits the smaller scale of Morwell Street. The proposed development for Morwell Street is 6-stories including the ground floor, the same as is proposed for Tottenham Court Road.
- (c). We are also concerned about, and wish to object to, the affect that the proposals will have on the educational buildings (studios and teaching spaces) at 248/250 Morwell Street used by the Architectural Association's (AA) School of Architecture, in terms of loss of quality of daylight and loss of sunlight. AS can be seen on the Proposed Section D-D drawing, this is due to the proposed development being considerably and detrimentally higher than the AA's Morwell Street building. This considerable change can be appreciated by comparing with the Existing Section D-D, which shows the existing buildings opposite on the western side of the Street as being lower.

3. Planning uses:

(a). Cafe use on the Ground Floor:

We welcome the proposed cafe use as an active frontage on the corner of Bayley Street and Morwell Street. But, at the on-line zoom meeting, we were concerned to hear that apparently this cafe use is regarded as "ancillary" to the office space and the office reception area. If this is ancillary use, then we are greatly concerned, because this cafe/active use could easily, over time, be lost and just become part of the office use and/or reception use. Thus, we think it is important that there is a **planning Condition** to prevent this use cafe/active frontage use in this location.

(b). Ground Floor planning uses along Morwell Street:

On the Morwell Street frontage, the proposed use is flexible D1/B1 use; we are concerned about how this (glazed) frontage along Morwell Street will be treated, with the possibility of it becoming "dead" (or untidy) frontages at each or every "bay", depending on which Use is taking place behind the glazed frontage. Thus, we think that it is important that there is a **planning Condition**, to ensure active frontages at each "bay" along the Ground Floor frontage.

(c). Proposed planning uses and the new Use Class E:

We are particularly concerned about the potential and future impact of the new Use Class E on the development. Our understanding is that any of the proposed uses in this development could be interchanged and/or become one use under Use Class E, to which we would strongly object. We would be interested to know how Camden will ensure that the proposed mix will be retained.

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4. Residential:

- (a). The residential is to be welcomed. We are not clear if this is affordable housing; but would press for the provision of affordable housing.
- (b). Although half of the residential flats/duplexes overlook the quiet Morwell Street, we are concerned that the remaining residential units overlook the major traffic street of Tottenham Court Road, instead of onto Morwell Street.
- (c). There is a very large, storey-height Air Inlet grill on the Morwell Ground Floor elevation - we are concerned that this location near to the residential above is likely to be detrimental in terms of noise (despite mitigation), including reflected noise due to the narrowness of the street - thus affecting the residential amenity of the flats and the residents.

5. Nos. 2-3 Morwell Street:

I myself/CSA provided the photographs and illustrations to show the interesting original shopfronts at nos. 2-3 Morwell Street. I understand that you arranged for the current hoardings to be removed, but that, unfortunately, little is left of the original frontages. This is disappointing; it is surprising that these two shopfronts were not picked up when the Bloomsbury Conservation Area plan was being revised in recent years when these frontages could still be seen; even though the frontages are on the opposite side of street "boundary" for the Conservation Area.

6. Design:

As seen in the 3-dimensional illustrations, there is not differentiation between the the top storey and those below, thus producing an uncomfortable lack of skyline to the top of the building., and giving an "endless" and somewhat unresolved vertical look. Although we appreciate the architectural design of a contemporary/modern building, the adjacent pub (on the corner of Tottenham Court Road and Bayley Street) as seen in the illustration, shows the traditional "cap" and roofline. In their submission, the architects show, as inspiration for their design, an illustration of Holland House by the architect Berlage – where the design of the skyline/top is satisfactorily resolved.

7. Public Realm proposals:

We understand that the current hire-bike docking station at the Bayley Street junction is to be moved to the wide paved area in front of Metropolis House, (nos. 39-45 Tottenham Court Road) which is between Percy Street and Windmill Street. We strongly object to this proposal to move and install the docking station on this paved area. Under the West End Project, there is the opportunity to create a decent small urban square for pedestrians in front of Metropolis House, and to be clear for pedestrians' use and enjoyment, without the clutter of a docking station making it inevitably more difficult for pedestrians.

8. Construction Management Plan; also a management plan for the Demolition:

- (a), We would encourage the adoption of the Draft Construction Management Plan/ CMP; our understanding is that, in this draft CMP, the proposed lorry routes avoid Bedford Square with its significant listed buildings and educational institutions including a school, and a school of architecture, and nearby residents.

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(b). Management Plan re. Demolition phase:

There does not appear to be a proposal for a management plan for the Demolition phase. We would urge that there is also a Management Plan for the Demolition phase, including lorry routes etc, in order to protect the residential amenity and the environment, including that of the conservation area etc.

9. Concern re. development not being built, following demolition:

- (a). In the current/on-going coronavirus situation, there might be the scenario where the buildings (174 Tottenham Court Road, 3 Bayley Street and 1 to 4 Morwell Street are demolished), but the developer then decides not to go ahead with building the development due to the (coronavirus) economic climate. We would then be left with a very large empty site in Tottenham Court Road/Morwell Street for an unknown number of years.
- (b). Thus, we would suggest the need for a legal agreement whereby there is evidence of a signed building contract for the construction of the (whole) development before **demolition** of the buildings takes place.

For the above reasons, we would urge that planning permission is not granted.

Yours sincerely,

Clive Henderson,

On behalf of Charlotte Street Association.

Copy: CSA Committee.
Bloomsbury Conservation Area Advisory Committee.