



247 TOTTENHAM COURT ROAD

WITH 3 BAYLEY STREET; 1, 2-3 AND 4 MORWELL STREET, LONDON W1T 7HH

PROPOSAL: Demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 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.

Application for planning permission: 2020/3583/P

23 November 2020

The Bloomsbury Association objects to this application and wishes to make the following further comments. These should be read together with those made on 20 September 2020.

1. Revised proposals for the project were uploaded to the planning case file on 18 November 2020. These include:
 - A revised elevation to Morwell Street;
 - A reduction in the extent of plant equipment at roof level;
 - Alterations to the layout of occupier cycle parking;
 - Amendments to the proposed loading strategy.

They also include a revised Construction Management Plan (CMP) that responds to the refusal of Camden's West End Project team to allow construction traffic to have dispensation to use Tottenham Court Road once the Project is implemented.

2. Whilst we appreciate that Tottenham Court Road is being improved by the West End Project, it is not right that traffic should take priority over people; over the impact on local residents, on adjoining businesses, on the safety and welfare of schoolchildren and over heritage sensitivities. Although options are vaguely described, it is abundantly clear from the drawings and correspondence accompanying the CMP that only one will be approved: access from Bloomsbury Street via Bedford Avenue and egress to Gower Street via Bedford Square.
3. We accept that site access for construction vehicles will have to be from the parallel 'back street', Morwell Street. That probably cannot be avoided. The question then is how heavy demolition and construction traffic gets to Morwell Street.
4. Gerald Eve, in their covering letter of 18 November, state: *"Officers have been clear that the construction traffic route needs to respect the Council's investment in the WEP"*. This conveniently ignores the substantial investment made by the Council, Bedford Estates, Crown Estate and English Heritage in the careful refurbishment of Bedford Square in 2000. It also ignores the improvement of Bedford Avenue to incorporate a safe, contra-flow cycle lane as part of the Council's strategic Phase 2 Cycle Permeability Scheme.
5. As when One Bedford Avenue was recently built, entry to Morwell Street should be from Tottenham Court Road, eastbound along a short section of Bedford Avenue; egress should

be back to Tottenham Court Road, westbound along a short section of Bayley Street. It should not entirely be from Gower Street, via Bedford Avenue and Bedford Square to mitigate against harmful impacts on residents on Bedford Avenue, on the school at 43-45 Bedford Square, on the Square's sensitive heritage and on the safety of cyclists using Bedford Avenue and Bedford Square, all proper planning considerations enshrined in Camden's adopted Local Plan policies.

6. This is what was agreed with the developer and his team in pre-application discussions. It is described in the initial CMP, submitted on 12 August, and is supported by Bedford Estates, École Jeannine Manuel, local residents, the Charlotte Street Association and the Fitzrovia Neighbourhood Association. It was successfully implemented during the demolition and construction stages of One Bedford Avenue. It made sense then and still makes sense now.
7. These measures have to be considered in terms of their cumulative impact, not only over a period of 3 years but over the period of some 13 years that local residents and businesses have suffered from the impact of a succession of major construction projects including the British Museum World Conservation and Exhibitions Centre, Crossrail, the West End Project, Central Cross at 18-30 Tottenham Court Road, One Bedford Avenue, Centre Point, St Giles Square, Castlewood House and Medius House and the underground hotel beneath the St Giles Hotel. As mentioned in our earlier comments, we appreciate the views expressed by another resident during the consultation period that *"There has been way too much construction in and around Tottenham Court Road - the last thing us residents need is another new building going up."*
8. The Cabinet Meeting held on 21 January 2014 considered, as Agenda item 16, West End Project Public Realm Improvements and gave approval for the project to proceed to detailed design and implementation. In doing so, Cabinet noted and had due regard to the results of the public consultation contained in the report and background papers. In these, it is acknowledged by Bloomsbury Ward Councillors that *"The traffic arrangements for the construction of One Bedford Avenue including the use of Morwell Street should be considered as a model."* Otherwise, there was discussion of restrictions on 'general traffic' but no discussion of what measures could be made for providing access to major construction sites within the Tottenham Court Road and Gower Street corridors after implementation. In that it was not considered and neither permitted nor precluded by Cabinet, we conclude each proposal should be judged on its merits.
9. We note that similar measures appear to have been agreed in the approved CMP (version 4, October 2019) for another equally constrained site during the demolition and construction stages of Castlewood House and Medius House on New Oxford Street. It would also be interesting to see what is proposed for the imminent redevelopment by Derwent of The Network Building at 95-100 Tottenham Court Road.
10. Neil McDonald, Team Manager (South), Development Management, commenting generally in relation to the process of approving CMPs, has advised: *"For proposals where construction impact is a particular issue we request a draft CMP upfront to ensure that thought is put into the process at an early stage. The measures set out in the draft are certainly a material consideration but since we are required to be proactive and positive in working with an applicant we would seek to flag the issues that need changing so they can get it right in the final version rather than refusing the application - the key point being that it is almost unheard of to refuse a development based on its construction impact provided all reasonable possible measures are being observed to ensure the impact is minimised."* We hold the Council to his word. There is always a first time for an application to be refused at Committee because a reasonably balanced view of priority has not been taken and the proposal does not ensure impacts during the demolition and construction stages are effectively minimised.
11. Policy A1 of Camden's Local Plan, Managing the Impact of Development, states: *'The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity'.* Under item (i) of the Policy, this includes consideration of factors to do with *'impacts of the construction phase, including the use of Construction Management Plans.'*

These are material considerations and we do not accept that it should be dealt with through the s106 process after permission is granted. Construction impact is a major issue here and the overall principals relating to the demolition and construction process have to be agreed at planning application stage. It cannot be left to vague and unrealistic options. If the applicant cannot demonstrate that the demolition and construction process can be effectively managed, the application should be refused as unable to meet the requirements of Policy A1.

12. While the amendments to the elevation to Morwell Street are an improvement, scale is still a significant issue. The comments made in our representation dated 20 September 2020 still stand, including those on other detailed aspects of the initial Construction Management Plan.

The Association supports good quality design that will enhance Bloomsbury's streetscape. In principal, we are generally supportive of this development as, once completed, it has the potential to add vitality to the surrounding streets. However, a number of significant concerns continue to be expressed about the proposal and the process by which it is realised that prompt us to 'Object' at this stage. Hence we look to the Council to refuse this application in its current form.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be determined under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:
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John Davies, Derwent London
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Thomas Prevot, École Jeannine Manuel
Anita Pfauntsch, Architectural Association
Bloomsbury Conservation Area Advisory Committee
Charlotte Street Association
Fitzrovia Neighbourhood Association
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