

## **Camden's policy document on land allocation: Holborn and Covent Garden**

### ***Introduction***

This note contains submissions on, and limited to, paras 7.1 to 7.12 and paras 7.23 to 7.30 of the document, together with the associated draft policy statements.

I make these submissions as a resident of Grape Street who has lived here since the mid 1990s and who is familiar both with the amenity and the disadvantages of living in the area.

### ***General***

I am not familiar with the background to this document or why it has been issued at this moment. Parts of it read as if it was in fact written some time ago. It is curious that there appears to be no reference to Covid or to the importance of re-using buildings rather than automatically tearing them down. One could be forgiven for making the mistake of concluding that the Council was describing options for the use of empty plots of land. Nor is the Council's West End Project mentioned in the sections I have reviewed.

In this connection I note that the Council's webpage about this exercise mentions that, since 2020 there have been material developments, notably:

- *Camden has declared a climate emergency*
- *there have been national changes to the planning system*
- *the New London Plan along with two new Neighbourhood Plans have been adopted*
- *we are in the midst of a worldwide pandemic that is likely to have a lasting impact on our work, home and leisure priorities.*

But it is not evident that the document, or its proposals, takes account to any adequate extent, of these important factors.

The document (for example para 7.5) refers to a separate document entitled *Holborn Vision and Urban strategy*. It would make sense to adopt a single joined up strategy, taking account of planning as well as wider strategic objectives. I note that Camden's website indicates work on the Holborn Vision has been paused. Will that be re-started soon?

The document lays bare a number of competing objectives and tradeoffs which will need to be reconciled in each individual case. As a resident, one of which I am very conscious is the friction between residential amenity and policies encouraging the "vibrant night time economy" which, sadly, often reduces to [REDACTED] and public [REDACTED], as well as drug dealing in dark streets. Narrow pavements have become smoking zones since the smoking ban inside licensed premises.

In relation to the composite site designated One Museum Street, I infer that the closure of the NCP, and the removal of all off street vehicular parking, is regarded by the Council as an unalloyed blessing. I would question that for a number of reasons:

- There is still a need for parking spaces in the area, not just for residents but also for contractors, especially if there is a concerted move in coming years to carry out insulation and boiler replacements in residential homes to meet climate change objectives.
- Off street parking is ideally suited to recharging of electric vehicles.
- There is a case to be made for having fewer cycle and scooter parks (including stands for hire vehicles) on narrow central London pavements and creating in their place dedicated parking and storage locations.
- The existing underground car park in West Central Street (separate from the former NCP) was used as a hub for local deliveries in green vehicles. Presumably that would be lost if the developer's current proposals proceed. A smaller and repurposed off street multifunctional vehicle facility in Museum Street could provide an alternative location for this useful service.
- Such a facility might also enable the resolution of the problem residents and the Council currently have in relation to recycling. We are rightly encouraged to recycle, but this has been made increasingly difficult because the Council has been reducing the number of recycling points in the vicinity on the grounds that the street based bins are vandalised or are used by commercial outlets for whom the bins are not intended. An off street recycling facility for residents might address these problems.
- This would also allow the Cuban Embassy and Consulate (corner of Grape Street and High Holborn) to park their diplomatic vehicles off street, rather than in the narrow roadway of Grape Street, where, as a result, even ignoring the dangerous cycle contraflow, vehicles often have to mount the western Grape Street pavement in order to get out of Grape Street.
- The justifications for prejudice against polluting private vehicles may reduce once the move to electric vehicles is substantially complete.

Finally, I hope the Council understands quite how stressful individual residents find the constant succession of construction activity in the area, together with the associated noise, pollution, and road and bus stop closures or diversions.

### ***Specific***

Para 7.2 rightly stresses that this area "has...some of London's most iconic architecture". Any development proposal needs therefore to take this factor into account and should be designed so as to:

- blend sensitively into the existing heritage environment;
- respect the proportions of that heritage environment; and
- avoid damage to views of and from this body of iconic architecture and

Development may also offer the opportunity to correct or at least ameliorate past mistakes, where the requisite sensitivity has not been shown. Those mistakes should certainly not be repeated or compounded.

Para 7.3 contains the assertion that some major businesses are "choosing to locate and invest in the area". I am not sure when this statement was first made. It has been true, but

there has also recently been a trend of moves towards King's Cross. In terms of investment, there may now be a glut of both office and retail space in Holborn and Covent Garden. Camden will be well placed to monitor this.

The reference in this paragraph to the communities in the area is welcomed.

Para 7.4. the area is gradually becoming more residential and presumably that trend may continue, notably by the conversion of office buildings and smaller hotels into residential.

The numbers in the section are difficult to follow. The text talks of 200 new homes by 2031 (which does not seem very ambitious). The box on the same page refers to 400 homes. The confusion is increased by the reference to 500 homes in a different area designated as the Tottenham Court Road opportunity area. Given all this ambiguity, it must be hard to produce a concrete strategy. I understand that the Council may still be uncertain precisely how much residential accommodation currently exists within the composite site.

It is noteworthy that the mix of these homes is not discussed. More social housing is needed. One would also have thought that this is an area which is well suited to the institutional build to rent sector.

Para 7.6: this refers to the Local Plan and to its principal emphasis on offices and housing. Has the Local Plan been updated in the light of Covid and the trend towards working from home? One might expect that some of the Georgian buildings which are currently small hotels might revert to residential use, with the loss of hotel beds being made good by either new build or conversion of offices.

I am surprised that the local plan appears not to refer to educational premises or accommodation. Additional space for exhibition, cultural or arts activities would be logical and welcomed. The Council will be aware that in happier times the British Museum had hoped to expand into the site now occupied by the Post Building.

Para 7.8: the comment that *New development is expected to deliver the highest quality architecture of a height and massing that complements the area's rich character, heritage assets and historic form* is welcomed. It is implicit in such a policy of complementarity that any new development respects the proportions of the area's historic heritage assets and does not dominate the area.

It is sadly correct that *some more modern buildings do not successfully relate to Holborn's rich architectural and historic surroundings and have eroded the area's character.*

Central St Giles is a good example of this failure, despite the employment of a star architect. It is essential the any new development proposals are more respectful of the *rich architectural and historic surroundings.*

Para 7.9. The comments about making lobbies accessible is interesting. It is not clear that any other recent developments have taken any action to allow the public in. These days, some of the buildings look like deserted wastes at ground floor level. Whilst this policy is laudable, how is it reconciled with legitimate security concerns?

In this connection, I understand that the access to the supposedly public roof space on the top of the Post Building is not easy.

Para 7.12: This refers to the Holborn Vision as if it is a formal Council Policy, whereas the Council's website makes clear that work on this has been paused. Presumably, as and when work recommences on the draft Holborn Vision and the associated public consultation process, it will be necessary to take stock of the impact, positive and negative, of the West End Project. Some of the junctions, notably at High Holborn and St Giles High Street, are very dangerous. The phasing of pedestrian crossing lights needs more work, as often the time allocated to pedestrians to cross roads is reduced by continuing passage by cycles and motor vehicles, buses being notably inclined to continue through red lights.

Given that there is less space available to public and private motor vehicles, congestion has inevitably increased. Is there any evidence, from the Council's monitoring, that pollution levels have reduced to any significant extent?

#### **Specific comments on HCG1**

Some of these aspirations are in conflict with each other.

By talking of "making the most efficient use of land", is Camden saying that every development must entail demolition of what exists and the erection of a skyscraper? This is hard to reconcile with *complementing the area's rich character, heritage assets and historic form*.

The policy talks of reinstating historic alleyways. It is not clear what is inherently valuable about alleyways that no longer exist. Presumably Camden does not propose to reinstate the rookeries for which the area was notorious. Furthermore, it must be questionable how this proposed policy objective would achieve the separate objective of making the most efficient use of land. Nor is it clear how that avoids creating opportunities for street crime and other antisocial behaviour.

There is a reference to the dominance of traffic in the area. This is partly correct, but reflects the fact that a number of the main streets are east /west or north/ south thoroughfares (including for public transport) and it is hard to see how that can be eliminated.

It is to be hoped that, before Camden makes any more proposals for modifications of traffic flows in the area, it will carry out a detailed study of the impact (including unintended consequences) of its recent changes as a result of the West End Plan. This appears to have had some perverse consequences, notably an increase in congestion and time spent by motor vehicles with engines idling in traffic jams at a time when an important thoroughfare (Tottenham Court Road) is often eerily empty (when not being dug up). There have also been changes to bus routes which are very inconvenient for local people, notably in relation to access to and from the hospital.

Camden needs also to have regard to the changes of policy which will accompany the increasing prevalence of electric vehicles, where the current prejudice against polluting motor vehicles may reduce.

### ***Your specific Questions***

Q 54: HCG1 looks as if it has been drafted to mean all things to all men. It is not specific enough to be capable of support, or a useful guide to policy application to specific proposals.

Q 55: it is surprising that there appears to be no reference to the educational or cultural activities in the area. This observation extends both to university and further education (including the City Lit), as well as ensuring there is adequate school provision for the increasing number of families which the housing policy implies.

Q 56: the document lumps together cyclists and pedestrians and is silent on the subject of scooters. The unspoken assumption appears to be that their interests are entirely aligned. Sadly, however, the respective interests of each of these constituencies can be in conflict, notably as to the use of very limited pavement space, both for travel and for parking of cycles and scooters. Mobility scooters will be on the increase. Demographics will mean that the Council will need to work with TFL to develop a coherent and realistic set of policies about this.

Bus routes need to be rethought. One gets the impression that the changes made recently were an afterthought added on after the West End project was finalised. If the area is going to be used permanently as a bus parking area, safe spaces dedicated for the purpose need to be built into the overall plan. At the moment, buses sometimes park on pedestrian crossings and reduce visibility for those crossing the street.

The need for public conveniences for those visiting the area should not be overlooked. Public urination is a constant problem.

Q 57: it is not clear which element of the boundary you are asking about. A look at the map shows that it is somewhat arbitrary, as is the line between Camden and Westminster in this part of the borough. I have separately commented on the problems with the proposed delineation of "One Museum Street".

Q 58: I have not had time to consider this point.

### ***Paras 7.23-7.30 One Museum Street***

Para 7.23: there is a disconnect between the description of the site and the area edged red in the plan. As a result, the description is a rather simplistic summary of a complex site, which is in reality several adjoining sites straddling a public highway and coincidentally united at the moment in common ownership. It is easiest to describe the site as four units, separated by a public highway (West Central Street):

- Selkirk House itself, the former Travelodge Hotel and the top two storeys which are residential accommodation;
- The low rise ex NCP car park;

- Part of the block (now largely empty but having included some residential accommodation, as well as a very problematic underground club) bounded by West Central Street, Museum Street and New Oxford Street;
- A vacant lot on the west of West Central Street, with a boundary backing on to the rear of Grape Street (and the Bloomsbury Conservation area);

The buildings north of West Central Street are part of the Bloomsbury Conservation area. In addition, the western boundary of the composite site, although not part of, adjoins the Bloomsbury Conservation area. The Council description suggests, inaccurately, that none of this composite site designated One Museum Street is within the Bloomsbury Conservation area.

It should also be borne in mind that much of the composite area described collectively as One Museum Street is already low rise.

It is important to remember that, as a result of the West End Project, West Central Street is an essential (and the only) vehicular thoroughfare for access (including deliveries) to Grape Street.

It may be that, despite the accident of current common ownership, these plots need to be considered separately. The plot north of West Central Street may need to be considered in conjunction with the missing plots at the north end of West Central Street and on the corner of Museum Street and New Oxford Street, which have been excluded for no obvious reason.

This composite site has an invisible added complexity, in the form of the Post Office underground railway running underground (and excepted from the developer's title). One assumes that this presents engineering challenges for any attempt to build a skyscraper on the site.

It is essential that the objectives outlined in the proposed policy HCG3, namely:

- *Ensure that any new buildings are designed to respond to the site's varied context, including listed buildings, the setting of specific heritage assets, and the Bloomsbury conservation area*
- *Ensure that any replacement building is of a height and massing that can successfully integrate with the surrounding townscape*

are respected in any redevelopment of any part of this composite site. See also my specific comments on the proposed policy, below.

Paras 7.23 to 7.30 generally: There are a couple of general comments to make:

- First, one gets the impression that some of the somewhat subjective and unsubstantiated comments and proposals in these paragraphs are framed having very specific regard to a particular planning application which has already been submitted in relation to the composite site. It is clearly wrong in governance and due process terms to confuse overall policy and the objective handling of individual applications by private sector businesses.

- Secondly, do the document, and the proposed policies, presuppose, without any justification, the desirability of the demolition of existing buildings? Surely that needs to be justified.

Para 7.27: the reference to “a more elegant and refined tower” (both adjectives being wholly subjective) reads like an advertorial for the Labtech proposal. This writer does not consider that the proposal is either elegant or refined. It was a mistake to allow a tower to be built on this site in the first place; allowing an even taller 80 metre skyscraper would simply compound the error.

Para 7.29: I do not see the purpose of the proposal for creating an alley from West Central Street to High Holborn. I note that this seems to be supporting a suggestion made unilaterally by the owner of the site as part of its current planning application in relation to the composite site.

All this would do would be to replace a direct dead end in West Central Street with a dead end a few yards further south in High Holborn, which is now a busy and often congested two way highway. Pedestrians wanting to go south would still have to turn left or right at some point. Pedestrians going north would simply not find it, compared to the existing streets. I was under the impression that the proposed pedestrianisation of the Shaftesbury Avenue Triangle (with the exception of vehicular access to Grape Street) under the West End Project was designed to lead people walking between Covent Garden and the British Museum to follow a path which would take them into or from Endell Street.

What data has Camden collected as to the (pre Covid) pedestrian patterns walking down Coptic Street as compared to Museum Street? In addition, crossing New Oxford Street and (still subject to vehicular traffic at this location) Shaftesbury Avenue at Coptic Street is less safe than doing so at Museum Street.

The idea that anti social activity can be wished away is absurd. The alley would be dangerous, dark at night and a noise tunnel.

Para 7.30: this refers to “significant public realm improvements are planned for the area” but does not explain what these are or in what document one can find them. Is this a reference to the West End Plan, or to the (temporarily shelved) Holborn Vision, or something completely different? Presumably this is not a reference to Labtech’s proposed dark alley.

Whilst on the subject of planning changes, there is a rumour that the developer wishes to site an electricity substation on the part of the site which backs on to Grape Street. It is hard to see how this would accord with any of the policies proposed by the Council or be conducive to residential amenity or safety.

### ***Comments on Policy HCG 3***

This is another example of a series of priorities which are likely to jostle with each other. They need to be prioritised. Sub paras (a) and (b) are the most important ones. The current application which has been submitted in relation to this site fails to meet these two criteria.

As a general comment, parts of this proposed policy look as if it has been reverse engineered to conveniently suit the proposals of the current owner of the composite site in relation to the parcels which it owns.

If the "price" of creating a narrow dark passage between West Central Street and High Holborn is an 80 metre tower, wholly out of keeping with *the site's varied context, including listed buildings, the setting of specific heritage assets, and the Bloomsbury conservation area*, then this is wholly disproportionate.

The number of homes proposed (50) seems very modest, particularly in the light of the fact it represents a rather small increase compared to the current (sadly long unused) residential components of the composite site.

### **Questions**

Q 61: No I do not support the entirety of the policy in its present form, for the reasons indicated above. I do support subparagraphs (a) and (b). Whilst the various component elements of the composite site call for regeneration, a more imaginative approach, consistent with the objectives in paragraphs (a) and (b), and one which does not involve wholesale demolition, should be considered, as mentioned above.

Q 62: No. I have already questioned whether this is in any proper sense a single site. Additionally, the boundary shown on the plan is misleading and arbitrary for a number of reasons.

- The "single" site includes a public highway, which should not be considered part of the site.
- With the exception of the highway, the delineation seems simply to track precisely the land parcels under common ownership. It is not clear why, in planning **policy** terms, the two sites on the north eastern and north western corners of West Central Street and the site on the north western corner of Museum Street should be excluded from the zoning policy review.
- The two blocks north and south of West Central Street have little in common except the accident of common ownership.
- The plan seems to imply that a decision has already been taken to introduce a new dark alley. That surely prejudices the outcome of what ought to be separate, independent and objective consultation and planning processes.

Please advise if a follow up public consultation meeting (in person or virtual) is proposed on this document or the underlying policy proposals.

**Peter Bloxham**

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**19.1.22**