

**From:** brewster susan <susanbrewster@blueyonder.co.uk>  
**Sent:** 14 July 2022 10:55  
**To:** Nathaniel Young; Planning Planning  
**Subject:** 2021/3704/P Minerva House and Telephone Exchange 1-4  
North Crescent and 5 North Crescent London WC1E 7PH  
**Attachments:** 20213704P 14.07.pdf

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Dear Nathaniel

Re: 2021/3704/P Minerva House and Telephone Exchange 1-4 North Crescent and 5 North Crescent WC1E7PH

Please see attached additional comments regarding the above application as new information has come to light.

Many thanks and regards

Susan Brewster

Susan Brewster  
Flat 13  
9 Chenies Street  
London, WC1E7ET

Mr. Nathaniel Young  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE

July 14, 2022

Dear Nathaniel,

Planning Application - **2021/3704/P and 2021/4679/L**  
Minerva House & Telephone Exchange 1-4 North Crescent and 5 North Crescent London WC1E 7PH

I am writing with additional comments to add to my earlier submission regarding the above application to take account of new information.

I am a resident of Chenies Street Chambers and have been for over 25 years. My two room flat with three, single aspect windows are approximately 20 metres from, and overlook the east elevation of the proposed extension site at Alfred Mews. Therefore I am directly impacted by this proposal.

The proposed extension to Minerva House (Grade 2 listed) and Telephone Exchange, (a positive building of architectural merit), would result in a building that is overbearing and oppressive, and would worsen our living conditions. The extension, and demolition, particularly the rear element of Telephone Exchange facing Alfred Mews, would cause harm to the setting of multiple Grade 2 and Grade 2\* Heritage Assets in our Bloomsbury conservation area due to its height, massing, and incongruous and unsympathetic form and design in this sensitive location. The result would be a building with an inappropriate relationship to the street and neighbouring properties.

The proposed structure for the rear element of the Telephone Exchange building would not relate to the form, proportion, composition, scale or character of the surrounding buildings in this setting of the Bloomsbury conservation area. The proposal for its partial/substantial demolition would also result in the removal of original architectural features and replaced with inappropriate materials, and the loss of a unique and important section of the building which is integral to the character and appearance of our area, without justification and without alternatives having been explored taking into account the views of our local community.

*Bloomsbury Conservation Area Appraisal and Asset Management Strategy*

Sub Area 4

5.55 "The buildings fronting North Crescent form a group of buildings in the Conservation Area of architectural value. They have concave elevations which follow the line of the crescent and are *uniform in terms of heights*."

5.32 "The appearance of all buildings of historic interest (listed and unlisted) within the conservation area is harmed by the removal or loss of original architectural features and the use of inappropriate materials."

5.39 "Within the Camden Bloomsbury Conservation Area there are many interesting examples of *historic rear elevations*. The original historic pattern of rear elevations within a street or group of buildings is an integral part of the character of the area and as such *rear extensions will not be acceptable where they would compromise the special character*."

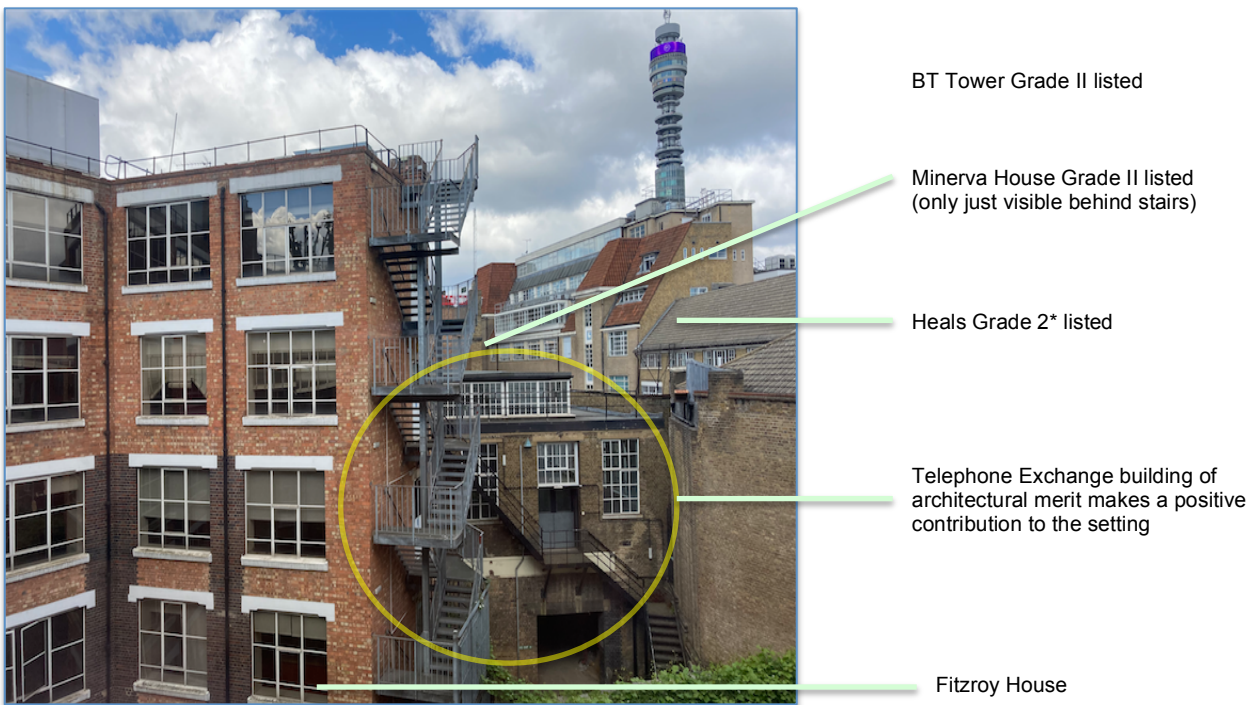
The community, who appreciate this unique setting of these heritage assets are mainly, but not exclusively, residents of the historic building known as Chenies Street Chambers. Our building, adjacent to the site was originally known as the Chenies Street Chambers Ladies Residential Dwellings and was designed as flats for single professional women on behalf of the Ladies Dwellings Company founded by Agnes Garrett. It was opened by the suffragist Millicent Fawcett in 1889. A reforming concept, it was almost the first institution of its kind; for women who wished to pursue professional careers. Its founders envisaged a community of likeminded individuals.

In 1941 the building was hit by a German incendiary bomb and was so damaged that rebuilding was doubtful. The evolving community of residents would have directly experienced this setting as it developed for over 100 years across three periods of British history, Victorian, Edwardian and Modern. The history and use of the buildings by the people who have lived and worked in them, mean that they are intimately connected and integral to what makes up of the character and setting of this historic place.

*NPPF Annex 2 Glossary*

“The setting of a heritage asset is the surroundings in which a heritage asset is experienced. Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset”

View 1 of the East Elevation from Chenies Chambers



Central to this view 1, encircled in yellow, is the rear element of (Museum)Telephone Exchange. This aspect, with the architectural feature of the raised glass roof would be demolished under the proposal.

The Post Master General and reformist, Henry Fawcett (married to Millicent Fawcett), oversaw the development of the telephone network in the late 1800's and is credited for first allowing telephone companies to establish public call offices, also known as payphones. These were open to everyone rather than just subscribers. He was a radical supporter of feminism and class equality. As the telephone network expanded, so too, Telephone Exchanges were increasing in number, creating a new employment opportunity for women that gave them some economic independence and an identity outside the home. It would be nearly 75 years before the last manual exchange was decommissioned. Women were the backbone of the telephonist workforce. Generations of women worked at the exchange on the phones in this building. The manual exchange was then transferred to Howland Street (the site of the BT Tower), after WWII. People who continued to work in the building (directory enquiries) would have directly experienced the BT Tower to the west being constructed, from their windows, as would also have been observed by the residents of Chenies Chambers. Built in 1966 to handle the nation's communications traffic, in this setting, the iconic BT Tower appears to have sprouted from its ancestral building of utilitarian form, the Telephone Exchange. The contrast and connection between the two buildings, gives an added dimension and significance to the BT Tower in this setting where you can see the direct ancestry between the two. Throughout that time, women helped to build and transform the telecommunications industry into what it is today, likely to have connecting local, national and international callers, in this and other similar buildings for nearly 100 years.

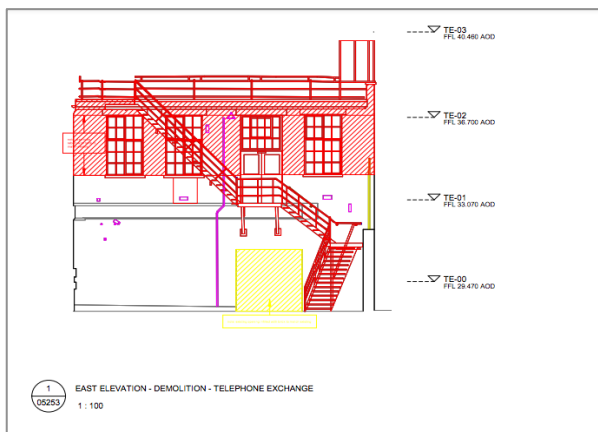
In the image, nestled between The Telephone Exchange and the BT Tower is the Heals grade 2\* listed building along with a glimpse of the rear of Minerva House. An interesting roofline can be seen with a matching palette of colours. The buildings co-exist harmoniously with no one building impinging on the other. Heals is supported by the Telephone Exchange with neither obscuring the unique architectural features of the other. The raised glass roof and fenestration of Telephone Exchange compliment the features of Heals and the BT Tower, at first rising to the red tile roof and finally to the iconic tower behind.

Fitzroy House in the foreground is said to have made airplane wings, propellers and munitions boxes during both wars (which may have been a factor for severe bomb damage suffered by Chenies Chambers in WWII). During peace time, furniture was provided to for Heals whereas Heals made parachutes in the war time, and upholstery in peace time (probably provided to Fitzroy House for the furniture).

The community of professional Women in Chenies Chambers were also architects, designers, writers, artists, doctors, likely to have worked or had professional relationships with all of the people working in these buildings at some time.

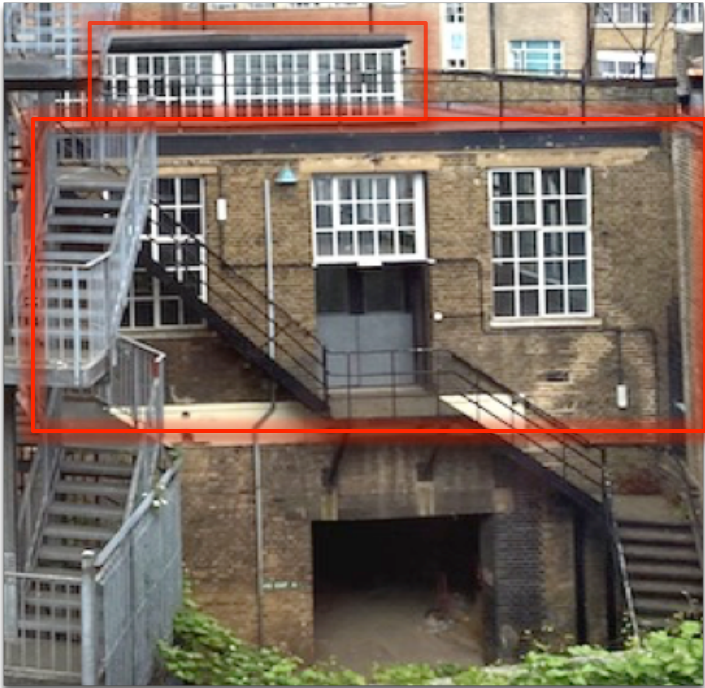
In addition to the visual connection between these buildings, it can be seen that they have a "...historic and aesthetic connection that amplifies the experience of the significance of each" (Historic England GPA3: The Setting of Historic Assets)

### The proposed demolition



Morris Drawing of East Elevation Demolition of Telephone Exchange (*their drawing does not show the architectural feature of the raised glass roof seen in the actual photo below*)

Actual photo of Telephone Exchange and proposed demolition in red



The proposed extension to rear element of Telephone Exchange



Visualisation (unverified) views from my flat provided by Morris & Co.

## The effect

Using the visualisation above of the wall/extension provided by Morris & Co., I have superimposed this onto the *actual* view because the Morris & Co. view cropped out the BT Tower Grade 2 listed and also cropped out the ground floor. This is meant to give an idea of the *effect and the harm of the proposed extension on the setting and significance of Heritage Assets*.



View 1 - before



View 1 - after

## View from other *main* room

The second view below is taken from the other room in my flat. I have simulated the area to illustrate that the proposed extension, as a **solid mass of metal and brick**, is highly likely to completely obscure and overwhelm Heritage Assets Heals, Grade II\* listed and BT Tower Grade II listed in this setting.



View 2 - before



View 2 - after

The applicant's THVIA (Townscape, Heritage and Visual Impact Assessment), with its focus on the front elevations at North Crescent and public realm observations, is silent on the rear aspect where equally there is a setting of these Heritage Assets experienced by an entire community of residents living in adjacent buildings. The proposal would forever change this setting for the worse. The applicant's THVIA flags Historic England's Planning Advice set out in Good Practice Notes and Advice Notes in paragraphs 4.44 – 4.46. Although mention is made of *GPA 3: The Setting of Heritage Assets* at paragraph 4.44, and at paragraph 4.45 explains there is a step-by-step methodology for identifying setting, the THVIA at paragraph 4.47 then goes on to say that the most relevant document to this development is HEAN 1, and no further reference is made to GPA3. No explanation is offered as to why the methodology in GPA3 was not considered applicable.

There were past communities of residents at Chenies Chambers who would have experienced this special setting of these Heritage Assets, and I consider myself fortunate that these views have been preserved for those of us who are able to appreciate them in the present day. If the proposals go ahead, then the harm will be irreversible, and this unique setting lost for future generations therefore I do not believe this development is in the public interest.

It is difficult to see what public benefits will be realised from this scheme that only substantially increases office space, and when so many local residents have objected with matters pertaining, to massing, noise, quality of life and daylight sunlight issues. Camden has made great strides in championing better quality of life for local residents through its local policies and recently creating more green spaces. But we wonder whether these gains are wiped out if permission is granted to unnecessary and contentious expansion in a conservation area, with clear material objections being expressed by local residents, and local conservation and community groups.

The oppressive nature of the design, massing, materials and form placed central within in this sensitive setting of Heritage Assets shows a lack of appreciation of the context of the buildings and a lack of respect for the architect John Rutherford working in the Arts and Crafts style, who designed many buildings for the Ministry of Works that are now listed.

If the proposal were to go ahead in its current form, it would remove the heart of this unique place and replace it with an oversized unhelpful prosthetic limb, unrelated to the special character of the area, serving only to achieve greater yield for the developer and the Global Investment Company. During this process, we are experiencing dismissal of the concerns of people who live here, some of whom have been residents since 1947. Not only is this disrespectful to us, but also shows disregard for future generations. Our RTA (Recognised Tenants Association) has been active and registered for 20 years with Camden, and considering the proximity of Chenies Chambers and the impact on its residents, the group should have been invited and actively participating in pre-planning meetings with the developer and this may have resulted in a proper consultation i.e. one where views are taken on board where people felt listened to and were able to influence the outcome of the final shape of the application. Throughout our limited contact with the developer, only made possible by our own insistence, we have been disappointedly left with the impression that nothing will change and that it is a done deal. We hope that Camden will take all the issues raised to heart and ensure that policies are robustly applied for the protection Heritage Assets and their setting, and for the residential amenities of the local community who will inevitably be the people living with the consequences.

## **Documents and photographs**

- THVIA (Townscape, Heritage and Visual Impact Assessment) Final July 2021 KM Heritage
- Bloomsbury Conservation Area Appraisal and Asset Management Strategy
- NPPF (National Policy Planning Framework)
- PPG (Planning Practice Guide)
- London Plan (HC1)
- Historic England GPA3 (The Setting of Heritage Assets – Historic England Good Practice Advice in Planning Note 3)
- Visualisation Morris and Co. view from Chenies Chambers
- Morris and Co. East Elevation Demolition
- Actual photos from Chenies Street Chambers
- Reference diagram of connected buildings in setting

## **Buildings in the setting (see photo view 1 and diagram)**

- Minerva House Grade 2 listed
- BT Tower Grade 2 listed
- (Museum)Telephone Exchange of architectural merit (makes a positive contribution to the character of the conservation area)
- Heals Grade 2 \*
- Fitzroy House
- Chenies Street Chambers





**Minerva House Grade II Listed 1912-13**

- Company Logo the head of Minerva the goddess of poetry, medicine, wisdom, commerce, weaving and the crafts
- During WWI Minerva manufactured card for the army specializing in armored motors that were mounted with machine guns
- Innovation in the Automotive Industry



**BT Tower Grade II Listed 1966**

- Innovation
- Iconic Design
- Social/economic Reform
- Mass Telecommunications
- Manual Telephone Exchange transferred here after WWI

**Eisenhower Centre**

- WWII shelters and tunnels likely to have been used by this local community



**Telephone Exchange** Positive Contributor of Architectural Merit 1912-13 (proposed part demolition and extension)

- Social/Economic Reform
- Ancestor to BT Tower
- Innovation
- Professional Working Women
- World Wars I and II
- Arts and Crafts Movement
- Henry Fawcett (wife Millicent)
- Early purpose built for growing mass communications
- John Rutherford Architect of other protected buildings
- Manual exchange moved to Howland Street site of BT Tower built later



**Heals Grade II\* Listed 1810 and beyond**

- Workshops and showrooms for Furniture Manufacture
- Innovation
- Arts and Crafts
- Parachutes during wartime
- Upholstery in peacetime for Fitzroy House



**G 2 listed Rangers Monument**  
London Regiment



**Fitzroy House 1912-13**

- Workshops and showrooms for Furniture Manufacture for Heals
- World Wars I and II
- Propellers and Munitions Boxes
- Wings in War Time
- Furniture for Heals in Peace Time



**Chenies Chambers 1888/89**

- Social/Economic Reform
- Millicent Fawcett
- Innovation
- Progressive Community of Professional Working Women
- Arts and Crafts Movement
- Impacted by 2 World Wars, badly bomb damaged in WWII

**‘Connected Buildings’ that contribute to the Setting of Heritage Assets** in the view from my flat which will be affected by the demolition and extension of Telephone Exchange and Minerva House.

Outside of the actual ‘view’ in grey, to the front of North Crescent is the Eisenhower Centre and the Grade II Listed Rangers Monument (WWI and WWII). The tunnels underneath used as shelters in WWII would have sheltered people living and working in all of these buildings. The bullet points show at a glance some of the historic and aesthetic connections that amplify the experience of the significance of each which I have explained in more detail in the main document.