



David Fowler
Planning Department
Camden Council

6 December 2022

Planning Application Reference: 2021/2954/P
One Museum Street WC1

OBJECTION

Dear Mr Fowler

I am the chair of Covent Garden Housing Cooperative and we manage fifty five dwellings in Camden's part of Covent Garden located in Earlham Street, Shaftesbury Avenue, West Street, Neal Street, Shelton St, Drury Lane, Stukeley Street and Neal Street.

I write to object to the proposals to redevelop the ex-Travelodge Hotel at the top of Drury Lane and the properties within Bloomsbury's Conservation Area in West Central Street, Museum Street and New Oxford Street, for the following reasons.

- The proposed demolition of a perfectly structurally sound building (the ex-Travelodge Hotel) to make way for a 74m high office tower block is unacceptable. We have a global warming crisis and the carbon dioxide emissions implicit in pulling down the existing building and then construction a taller building requiring more concrete and steel when we know that a rise of 1.5 deg C in world temperature will bring a disaster to the world is frankly outrageous. The developers may well say that in 40/50 years' time their new building will balance the carbon emissions they will cause as a consequence of the demolition of the existing building, but this rather misses the point as we have only six years * to stop increasing carbon emissions not add to them. For Camden to approve this speculative office scheme which is entirely driven by greed would be more than reprehensible, it would be outrageous. Clearly a retrofit design approach should be adopted.
- The proposed tower block is entirely out of character with the two conservation areas adjoining the development site, Covent Garden/Seven Dials and Bloomsbury. Both are unique and contain many listed buildings and some of world renown quality not least St George's Church, The British Museum and Bedford Square. All Camden's Conservation Area and Urban Design policies about protecting the historic environment and street state that such a proposal should be refused as it will undoubtedly result in irrevocable visual and historic damage to this very special part of central London. If a tower block is consented to in this location by Camden Council then inevitably before very long other developers will require further tower blocks and Camden will not be able to resist as they have created the precedent; does Camden planning department actually want a cluster of other tower blocks in Holborn, if so why have they not stated as much in their Local Plan?
- The quantity of redevelopment proposed within the conservation area along West Central Street Museum St and New Oxford Street is again unacceptable and flagrantly contrary to Camden's planning policies. For example, the demolition and gutting behind retained facades is completely contrary to planning policies D2(f) and (g) and the effect of the proposed office tower is obviously detrimental to the setting of the conservation area adjacent and contrary to Policy D1.
- The development proposal has a lack of proposed new public open space. Camden have clear policies that require new commercial floorspace to be balanced by the inclusion of new public open space. The developers claim that putting a few benches and planters on the pavement and cutting a through route from West Central St to High Holborn with a minuscule stamp sized green planted area, they meet the planning policy requirements. There is a clearly a difference between public open space and pavement planters and a hard

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surfaced thoroughfare. In no way can the latter be described as a public open space. The Council is only too well aware of the difference but appears to be quite content to allow the One Museum Street scheme to provide no new public open space claiming the pavement improvements will suffice. As has been demonstrated by the Post House development adjacent it is perfectly possible to provide public open space at roof level, and there are plenty of such like examples in the City of London. The lack of public open space in this area of London is very evident especially at lunch time when office workers overwhelm the few open spaces in the vicinity, and indeed that is why the Council has its open space policy concerning new office development.

- The social housing provision is derisory. The idea that 9 new general needs housing units is compliant with Camden's Housing Policies fails to recognise that there used to exist on the site some 6 homes in multiple occupancy (HMO) which were low rent. While it is acknowledged that the new general needs homes are for families if allowance is taken for the loss of the 6 HMO then the actual general needs housing gain is in the region of 4/5 dwellings which is clearly not compliant to the pitifully small planning requirements for socially rented accommodation. In addition, all the remaining housing that is proposed will be private or rented at a level completely beyond the financial capacity of the general national working income of £37,000 per annum. The 9 'affordable flats' will be rented out at 80% of market rents implying it will be necessary to have an annual income in excess of £65,000 and 20 units for sale will clearly do nothing to meet any real housing need as they will be so expensive that the accommodation will be commodities never homes. Moreover, the affordable and private proposed housing totals 29 and this is set against the loss of the 12 existing maisonette flats that exist at the top of the ex-Travelodge Hotel tower, so in effect the private housing 'gain' is reduced to 17. In addition, the socially rented accommodation is located in the worst possible location completely in the shadow of the proposed tower block that will require all the dwellings to rely on artificial light almost all day.

In summary it is hard to contemplate a more unsatisfactory proposal and we hope that the scheme is refused on the grounds stated above.

Yours sincerely,

Signed on behalf of Caroline Cowie
Chair Covent Garden Housing Co-op

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