



21 BLOOMSBURY STREET
LONDON WC1B 3HF

Proposal: Alterations to existing building comprising rear extension with new terraces at second to sixth floors; creation of office space within existing sixth floor roof with new dormers and plant enclosure; new roof terrace and pavilion with sedum roof; replacement of windows; alterations to entrances; replacement of faux chimney stacks and associated works

Application for planning permission reference: 2022/4361/P

20 January 2023

The Bloomsbury Association objects to this application and wishes to make the following comments.

1. Housing

The proposal does not comply with Policy H2 of the Local Plan. This states: '*We will require 50% of additional floorspace to be self-contained housing in development involving more than 200 sqm (GIA) additional floorspace in the Central London Area and the larger town centres*'.

The uplift in non-residential floorspace should be matched by the same in residential floorspace. So an uplift of commercial floorspace of 719 sqm equates to a matching seven homes, at approximately 100 sqm per home. However, the applicant is arguing that policy requires only half that amount of housing and is offering a payment in lieu calculated on that floorspace.

Camden's policy is confusing as it also gives an example where housing should equal half of the commercial floorspace. So the planning statement proposes that the following is acceptable would appear to be policy compliant in accordance with page 78 of the Council's Housing Guidance:

719 x 50 % (as per Policy H2 Target) = 359.5 sqm (GIA) - three or four homes.
A payment of 359.5 sqm x £1,500 = £539,250.00 is calculated.

However, the developer says it is not viable to make that payment in lieu so they are offering nothing. We believe that that the current proposal does generate a substantial return and that a policy compliant level of housing should be provided. Consideration should be given to integrating the housing generated by the uplift in floorspace with the development's immediate residential neighbour, Bedford Court Mansions.

2. Construction management

We would like to see a draft s106 Agreement with provisions for both a Demolition Management Plan and a Construction Management Plan. As a first step, we would like to see a draft of the s106 Agreement submitted in support of the planning application and we suggest the Council would be unwise to consider any Officer recommendation to Committee in its absence. Indeed, it will not be possible for us to fully comment on the application and its compliance with Policy A1 without this.

There appears to be a conflict between the site access and egress arrangements proposed in the pro-forma CMP and the agreed DMP and CMP for 247 Tottenham Court Road, now under construction. Both use the same access route from Bloomsbury Street via Bedford Avenue, both use the same design team, the same transportation consultant, Momentum, and both fail to acknowledge each other. Indeed there are four other neighbouring construction sites on

Bedford Avenue and Adeline Place, none of which are acknowledged in the pro-forma Plan. The St Giles Hotel, the proposed underground hotel beneath it and the Dominion Theatre are also substantial vehicle generators affecting traffic on Bedford Avenue and Adeline Place.

To make matters worse, demolition and strip-out for this proposed development appears to have commenced. Photographs are included showing the gantry constructed over Bedford Avenue in December 2022 to enable demolition materials to be removed from site.



We are concerned that things are proceeding so quickly prior to any planning permission being granted, in advance of any s106 Agreement being concluded and prior to Demolition and Construction Management Plans being consulted on and agreed. The Council will no doubt be told that only strip-out work is commencing and that this does not need prior consultation or prior consent for an unlisted building in a conservation area. While this is correct, it is inconsiderate of neighbours and cannot begin without prior agreement from the highway authority to construct a working space on and over the highway, which is what appears to have happened behind closed doors. We suggest officers need to be asking why, particularly as this could have an unmanageable cumulative impact with Bedford Avenue also being used at the same time for substantial vehicle movement to service the construction of 247 Tottenham Court Road, a process that is already proving very challenging.

This appears to be an example of left hand not knowing what right hand is doing. Why, in an area where any construction is challenging and cumulative impacts severe, has Camden Highways has acted independently to grant a gantry licence in a way that could frustrate the planning process? We reject the assertion made by the planning consultant in Gerald Eve's e-mail to the Council of 6 December 2022 that this is entirely "*unrelated to the development proposed*". Of course it is.

21 Bloomsbury Street is a major development, the construction of which impacts on all the same sensitivities as 247 Tottenham Court Road. These are the health and welfare of residents, the wellbeing of businesses, the safety of schoolchildren and the safeguarding of heritage assets, including a whole street of Grade I listed buildings, along with all the complexities of road and cycleway safety. Managing these impacts needs to be dealt with in the same way as adopted for 247 Tottenham Court Road: objectives first defined in the s106 Agreement with implementation then agreed through the Demolition and Construction Management Plans. Demolition and strip-out work should not be allowed to commence until this process has been properly followed through.

Local Plan Policy A1, 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 independently through the s106 process after permission is granted. Construction impact is a major issue here, as it is for the construction site at 247 Tottenham Court Road, and the overall principles relating to the demolition and construction process have to be agreed at planning application stage with full public scrutiny. It cannot be left to vague and unrealistic possibilities discussed behind closed doors. If the applicant is to press ahead regardless, without consideration of neighbours and without demonstrating that the demolition and construction process can be effectively managed, then the application should be refused as unable to meet the requirements of Policy A1.

Detailed construction management provisions:

- Demolition and construction working hours should exclude Saturdays, Sundays and Bank holidays in order to give residential neighbours some respite. On working days, further time limitations should apply to noisy works.
- The presence of a school and higher educational institutions in the immediate area should be acknowledged rather than ignored and vehicle arrivals and departures from site should respect the hours stated in the pro-forma CMP, namely 09:30 - 15:00 during term time.
- Vehicles will not be able to enter the site so the provision for '*ensuring that vehicles are loaded and unloaded on site*' and for vehicles '*to arrive at site at 08:00 if they can be accommodated on site*' should be omitted and no vehicle should arrive at or leave site before 09:30 or depart after 16:30.
- Pavement width should not be reduced to create such a huge loading/unloading area for vehicles on Bedford Avenue in order to protect pedestrian safety and safeguard the structural integrity of historic vaults beneath the pavement. Loss of residents' parking should be minimised. The applicant should be aware that Bedford Avenue was resurfaced only two years ago.
- A vehicle holding area on Malet Street should be proposed, to be shared with construction vehicles serving 247 Tottenham Court Road.
- Sensitive/affected receptors should include the school and higher educational institutions in the immediate area. Also the north side of Bedford Avenue, which is Grade I listed in its entirety.
- Great Russell Street is jammed with traffic most days so this is not a sensible egress route; there is no left turn from Bloomsbury Way / Vernon Place into Southampton Row.
- Measures for noise, vibration and dust mitigation and monitoring should be agreed with adjoining residential neighbours in Bedford Court Mansions and Florida State University.

3. **Design**

21 Bloomsbury Street is an integral part of the composition of Bedford Court Mansions. It is not a symmetrical building but was developed along Bedford Avenue in the 1890s as a single architectural composition and the two prominent corners with Adeline Place, to the west, and with Bloomsbury Street, to the east, are both expressed as 'turrets' of projecting bay windows. The corner bays are more or less identical and the whole corner needs to be considered for the height of the building, not just one floor. There are original curved windows frames to 12 and 12A Adeline Place, at raised ground and lower ground floors of this corner. They align with each other. Most of the curved glazing to the windows of 21 Bloomsbury Street were replaced with flat glass when developed behind a retained façade in the 1980s but the original curved glass is evident below on the corner of Adeline Place. This particular feature of the architectural expression of the building is important and should be reinstated to enhance the Bloomsbury Conservation Area - See the Association's comments on application for planning permission reference 2022/2556/P, dated 14 August 2022, with accompanying images.

The Association has always taken a firm position in ensuring that the asset value of Bloomsbury's heritage is not adversely affected by new development and expects the Council to ensure that the requirements of policy D2(e) are met and that it will not permit any further development that it considers would cause harm rather than enhance the character and appearance of the Bloomsbury Conservation Area.

4. **Neighbourly issues**

Notwithstanding issues to do with rights of light, we are concerned at the impact overshadowing of the development will have on sunlight and daylight to the lightwell serving adjoining homes in Bedford Court Mansions, contrary to the provisions of Policy A1 and CPG:Amenity. We are also concerned about the impact on privacy and of the potential for noise emanating from the roof garden spaces, particularly from what appears to be either a bar, cafe or servery, vaguely annotated 'amenity' on the south side of the development at 7th floor level. Policy A1 states that '*The Council will seek to protect the quality of life of occupiers and neighbours*' and will not grant permission for development that '*causes unacceptable harm to amenity*'. Policy A1 goes on to say the Council will '*seek to ensure that the amenity of communities, occupiers and neighbours is protected*' and '*require mitigation measures where necessary*'. With regard to the use of the roof spaces, we would like to see conditions imposed on any permission granted limiting noise emissions and times and types of use, including the number of people gathering at any one time.

The applicant has not consulted with the Bloomsbury Association prior to the application being submitted nor do we understand that any consultation has taken place with residential neighbours in Bedford Court Mansions. Had the applicant sought to do so, in accordance with para 40 of the NPPF, some of the issues raised above could have been avoided and the Statement of Community Involvement accompanying the application might be taken more seriously. To maintain an adversarial relationship is neither going to be helpful nor productive in ensuring ongoing smooth progress of the development.

The Association supports good quality design that complies with policy and will enhance Bloomsbury's environment. A number of significant concerns have been expressed about the proposal 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 decided 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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