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Queen Alexandra Mansions
Grape Street
London WC2H 8DX**

London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

21 February 2023

Dear Sirs

Re: Composite Planning Applications (*Composite Planning Applications*) in respect of proposals for the development of a series of plots bounded by High Holborn, Museum Street, New Oxford Street and West Central Street including Selkirk House, Museum Street (originally Labtech application 2021/ 2954 P)

I refer to the Composite Planning Applications, as well as to previous correspondence and emails.

This is to deal with one, procedural (but important) point. I understand that Camden has set a deadline of 6 March for submissions to be made on the Composite Planning Applications.

I consider that this deadline is arbitrary and unreasonable, for the following principal reasons:

Model not yet on display: at a single presentation on 9 April 2022, a model was produced showing the effect of the Composite Planning Applications and, in particular, the impact of the proposed 74 metre skyscraper. Since then, commencing on 28 April

2022, I have asked for the model to be placed on public display. Finally this was agreed by Simten on behalf of BC Partners at a meeting on 6 January. However, this undertaking has yet to be honoured, although I am informed the model will be visible at some point from this week. It is important that people (not just Council Officers), have the opportunity to respond to the impact of the model.

Independent Sustainability Report outstanding: I understand that Camden have commissioned their own independent sustainability report (**Independent Sustainability Report**) and that this will be made publicly available. So far as I am aware, this has not yet been finalised or placed on the public electronic file relating to the Composite Planning Applications.

Responses required from BC Partners to findings of Campbell Reith Report: Camden commissioned a report by Campbell Reith (**Campbell Reith Report**) on the 2021 Basement Impact Assessment. The Campbell Reith Report raises some very substantial and concerning issues, on which it is incumbent for BC Partners to respond to the satisfaction of Camden and affected residents and community organisations.

Clarity required in relation to BC Partners' proposals for West Central Street: the Composite Planning Applications are in reality several distinct development proposals wrapped into one, for reasons best known to BC Partners. The inevitable focus on the 74 metre skyscraper proposed by BC Partners has deflected attention from what is proposed in the plots on each side of West Central Street, including those within the Bloomsbury Conservation Area (**West Central Street Plots**). These proposals may be controversial in different ways. Inspection of the model will assist in understanding, at least visually, what is proposed by BC Partners in those plots and the impact on neighbouring residential buildings, but BC Partners have been asked to make one or more presentations to those likely to be affected, so as to provide explanations and answer questions both about the actual proposals themselves and the demolition and construction processes involved.

There may be other significant lacunas in the submissions currently available in support of the Composite Planning Applications. Camden Officers will be more familiar with any of these.

All the above outstanding points are highly material to any overall assessment of the Composite Planning Applications (including the safety of the processes proposed by BC Partners to implement their proposals). Indeed, some of the outstanding points may cast doubt on the conclusiveness of other submissions already made by BC Partners

(for example in relation to sustainability or timetables). Consequently, it would be unfair to deprive interested parties of the opportunity to make submissions (or supplemental submissions) in the light of the information resulting from the completion of these processes.

I therefore invite Camden to amend the 6 March deadline and to make the three week period run from the latest to occur of:

- The date on which BC Partners or their agents have notified interested parties that the model is on public display, explaining arrangements for inspection;
- The date on which the Independent Sustainability Report is placed on the Camden's electronic public planning file relating to the Composite Planning Applications;
- The date on which BC Partners or their agents have filed on the electronic public planning file in respect of the Composite Planning Applications their substantive and comprehensive response to the Campbell Reith Report; and
- The latest date on which BC Partners have made full presentations to potentially affected parties on the detail of their proposals (including demolition and construction methodology) for the West Central Street Plots.

It is unfair to set an early deadline for making representations when there are so many substantive issues outstanding. At the moment one has the impression that BC Partners, and the substantial team of professionals who have been working on this project for so long (including fro Labtech), have not been able to demonstrate how they would safely execute their proposals, should they be granted planning permission.

I look forward to hearing from you. In the meanwhile, I reserve my position.

Yours faithfully,

Peter Bloxham