

BCAAC ADDITIONAL COMMENTS EAP EXAMINATION

General observations.

The Advisory Committee is concerned regarding a potential serious conflict of 'interest' given LBC's considerable land ownership within the EAP area.

It notes with great concern, the use of the word 'image' throughout the document. This is not a proper planning concept and should not form part of the justification for the aims and objectives. It is a highly subjective concept redolent of the worlds of public relations and spin-doctors and should be struck out of the final draft. For it to remain is considered to be unsound.

BCAAC also considers the frequent use of vibrancy or **vibrant** to be highly inappropriate in the context of the Euston area, immediately adjacent to Bloomsbury, which is renowned for its tranquillity. The notion of making the Euston Road and its 'environment 'vibrant' is frankly ludicrous and smacks of property developer hype and should be struck out of the document.

MATTER 4 – EUSTON STATION

BCAAC considers that it will be essential for the council to define and explain what it considers as constituting a 'world class' transport interchange here, by reference to other 'world class' examples for comparison.

MATTER 6 - HERITAGE

Bullet point 4

The Advisory Committee considers it prudent, desirable and sound to follow closely the long standing statutory definitions and requirements placed on both LBC and the Secretary of State regarding listed buildings and conservation areas...e.g. to have '**special regard**'* and pay **special attention** to the **preservation** or enhancement of conservation areas and their settings.

This should be reflected consistently throughout the document.

**It has been held that this requirement means more than just paying lip service and that decision makers have to be able to demonstrate that they have done so in the reasons they give for their determinations.*

Bloomsbury Conservation Area

The Bloomsbury Conservation Area is far more than an “important asset.” “Outstanding” or “world class” would seem to be more appropriate. Its northern boundary runs along the north side of Euston Square. Therefore, it is essential that this conservation area be added to the list in Section 6 and given due consideration at the hearing, as any development is bound to have significant potentially harmful impacts on its special character and appearance. The relationship of the conservation area to its northern setting and the effect of that setting on the area must be given full and serious consideration.

Settings

Recognition should also be made of the importance and sensitivity of the settings of numerous listed buildings, which lie immediately to the south of the EAP area, including Friends House and the terraces and squares of Bloomsbury, for which it is rightly famous. These are especially sensitive to the potentially harmful impact of any proposals for high/tall buildings*, given the homogenous and consistent layout and scale, an historic townscape hardly equalled anywhere else in central London.

*it is essential that the plan includes a definition of what constitutes a ‘high’ or ‘tall’ building. One useful example is: “ a building which is significantly higher than its surroundings”

Existing station buildings

Consideration should also be given to the addition of the existing station arrival hall and front podium block under Matter 6 – Heritage bullet point 4, as a potential and undervalued part of our more recent national architectural history and heritage. This is described rather lamely in the document as: “dated”. This unenlightened, dismissive critique is akin to the objections raised about the design of the High Victorian and then deeply unfashionable St Pancras Station building when demolition was proposed. It is surprising, or maybe heartening indeed, that an appealing image of the stylish Seifert podium block is used on the cover of the plan document itself!

Reference is also made to the fact that the retention of these buildings would be the sustainable option, which is stating the obvious. The fact that the

existing hall has been mutilated and neglected by the rail operators should not be allowed to detract from its underlying quality and potential for a tremendous uplift and enhancement, with imagination and remarkably little effort.

This also applies to the external area between the arrival hall and the podium block, which is far from traveller friendly at present and could be radically improved to create an open, stylish and human scaled environment worthy of this premier location.

These buildings are representative of one of the most significant and progressive eras in Britain in the 20th century and should not be destroyed without the fullest consideration. BCAAC has already remarked on the appropriateness of the building form to the conservation area in its earlier submission.

The creation of an improved train shed behind a retained and restored front building complex would be entirely consistent with development strategies adopted at both St Pancras and King's Cross, the neighbouring main line stations.

Further BCAAC proposed changes to document text

Wherever world class design or architecture is mentioned in the plan this should be qualified by the insertion of: **“that also pays proper regard to its historic context.”**

It will also be important for the council to define what is meant by world class in this connection by quoting examples as architects are notorious self-propagandists and tastes are subject to wild fluctuations and the fleeting dictates of fads, fancies and fashion.

BCAAC is very concerned that this desire for 'world class' or 'excellent design' could, in practice, be little more than a 'fig-leaf' to attempt to justify gross over-development. In this regard it would refer to the famous 1980s landmark decision relating to the rejection of Lord Palumbo's Mansion House Square proposal notwithstanding the fact it was designed by architect: Mies van der Rohe widely regarded as producing world class architecture. In his landmark decision, the then Secretary of State, Patrick Jenkin stated that:

“However fine a new design maybe considered to be, proper regard should be had to the context and by that test, the development fails.”

SITE VISITS

BCAAC trusts that adequate time will be allocated for accompanied site visits and a unique chance to experience the plan area in the wider context of Camden and central London and especially its relationship with the Bloomsbury Conservation Area to the south and how it relates to the surrounding urban landscape generally would be gained from the viewing gallery of the CentrePoint Tower. Therefore, BCAAC considers that such a visit would be very helpful to this Examination.

BCAAC successfully lobbied to have the tower included on the statutory list of buildings of special architectural or historic interest, prompted by a scheme to add external wall-climber lifts at either end by Allies and Morrison, which it vigorously opposed with the personal assistance of Richard Seifert.

It is highly relevant to note that this was probably one of the most despised and unpopular developments of its era, also designed by Richard Seifert and apparently one of his favourite projects.

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