

TWENTIETH CENTURY HOUSE - 31-32, SOHO SQUARE, 65-66, FRITH STREET, 22-25, DEAN STREET, AND 10, CHAPONE PLACE, SOHO, LONDON, W.1.

COMMENTS ON THE OFFICERS' REPORT TO THE MEETING OF THE PLANNING APPLICATIONS SUB-COMMITTEE SCHEDULED FOR THE 21st JULY, 2020

These comments are based on a careful reading of the officers' report on the application for Planning Permission for the demolition and redevelopment of Twentieth Century House behind partly retained street-elevations and the redevelopment of adjoining buildings recently made available for public scrutiny. They focus specifically on Section 8.2 of the report, headed 'Townscape and Design' (but not – significantly - 'Conservation').

Most regrettably, this fundamentally relevant part of the officers' report reflects an unsound and substantially unbalanced position on the important conservation and urban design aspects of the proposals on the part of officers, leading to the highly questionable recommendation of approval for a scheme which includes key features which will seriously harm the significance of both designated heritage assets, such as the Soho Conservation Area and a non-designated heritage asset - Twentieth Century House – as well as damaging the settings of nearby listed buildings – all contrary to relevant national, London-wide and local planning policies.

Policy matters:

In referring to the national planning policies contained in the *National Planning Policy Framework (NPPF)*, officers summarise in only the briefest terms the highly relevant, seven paragraphs in the policy document. Members are not being advised of the particular relevance of all seven policies contained in paragraphs 127.c, 130, 193, 194, 195/196 or 197. Similarly, members are not being advised of the particular relevance of Policies, DES 1 (A), DES 2 (E) and (F), DES 5 (A), DES 6 (A)(1) and (4) and (B)(1),(2) and (3), DES 9 (1) and (2)(b) and DES 10 (D) of the *City of Westminster UDP* of January, 2007. Importantly, key aspects of the proposals are in fundamental conflict with these national and local planning policies. In addition, officers fail to refer to highly relevant, London-wide planning policies contained in the *London Plan* - namely Policies 7.4 (B) relating to respecting local character, and 7.8 (D) relating to conserving the significance of heritage assets.

Officers state that 'the principle of demolishing an unlisted, twentieth century commercial building, such as Century House (sic), behind its retained (sic) facades, and creating new office space behind, is not contrary to the City Council's urban design and conservation policies', whereas, it is clearly contrary to the 'general presumption' contained policy DES 9 (B) relating to proposals for the demolition of unlisted buildings identified as of local architectural, historical or topographical interest in adopted conservation audits, such as Twentieth Century House. In responding to the expressed concerns of the Soho Society, officers state that 'the current proposals for partial demolition and redevelopment are considered, in principle, to be compliant with the City Council's policies and approach to such commercial buildings'. As noted above, they are NOT compliant.

Officers rightly acknowledge that 'This is a highly controversial scheme'; that 'the revised proposals address many of the objections raised by officers to the original scheme, although they do not address the concerns of a large number of objectors'; that 'the revised scheme will still cause (less than substantial) harm to the character and appearance of the Soho Conservation Area'; that 'the scheme does not comply with some (sic) of the policies in the draft Soho neighbourhood Plan', but then go on

to claim controversially that ‘overall the scheme includes public benefits which will outweigh that harm’ and that ‘taken as a whole it is considered to comply with the City Council’s urban design and conservation policies’ and ‘the *NPPF*’.

Officers clearly justify their position on the view that the ‘harm’ effected by the proposals on the character, appearance and significance of the Soho Conservation Area is ‘less than substantial’ – to use the term used in the *NPPF*. However, taken overall, the proposals will cause ‘substantial harm’, not only to the significance of the conservation area as ‘a designated heritage asset’ – to use the term used in the *NPPF*, but as importantly, to the significance of Twentieth Century House as a ‘non-designated heritage asset’ contrary to paragraph 197 of the *NPPF*. On this basis, the potential public benefits of the proposals need to be ‘substantial’ and sufficient to outweigh the substantial harm to the significance of both the Soho Conservation Area AND Twentieth Century House in order to accord with paragraphs 195 and 196 of the *NPPF*.

Omissions:

Importantly, officers fail to advise the committee that Twentieth Century House has been formally identified as a ‘Building of Merit’ in the *Soho Conservation Area Audit*. (However, they do acknowledge that the building makes a positive contribution to the Soho Conservation Area). Importantly, officers fail to advise members of the Committee, that as such, the building may be considered as a ‘non-designated heritage asset’ for the purposes of the policy considerations in the *NPPF* or of the highly relevant policy relating to such assets at paragraph 197 of the *NPPF*.

Officers fail to respond adequately to the concerns expressed by the Soho Society regarding the potentially damaging impact of the upward stretching of Twentieth Century House at fourth floor level on the particular significance of Twentieth Century House, or of the excessive bulk and damaging profile of the development at roof level on the particular architectural integrity, townscape value and significance of Twentieth Century House or on the character, appearance and significance of the Soho Conservation Area or the settings of nearby listed buildings. Such deficiencies are merely dismissed as ‘relatively small’ and ‘acceptable in principle’. The officers claim that that ‘the new build elements of the scheme are generally acceptable in urban design and conservation terms’ suggests a serious lack of sound judgement on the part of the officers.

Conclusion:

The substantial deficiencies contained in the officers’ report identified above bring into serious doubt the soundness of the officers’ recommendation to approve the scheme as presently submitted.