

Re: PA/14/03548 and PA/14/03618. Land bounded by Elder Street, Folgate Street, Blossom Street, Norton Folgate, Shoreditch High Street and Commercial Street, E1

Dear Adam Hussain,

This letter is sent on behalf of the Spitalfields Community Group, to OBJECT to the above named planning application. Spitalfields Community Group (SCG) was founded in 2011 with the aim of representing those who live and work in Spitalfields, enhancing their quality of living, and improving their sense of community.

We note that the Council has stated that it will be accepting comments up until the date of the Hearing on this application – and up until mid March to be sure of inclusion in the planning officer's report. We feel that this scheme represents an unacceptable over-development within a Conservation Area. The Council's own Conservation Area Appraisal for Elder St states:

“Overall this is a cohesive area that has little capacity for change.... Future needs should be met by the sensitive repair of the historic building stock.”

This scheme ignores that advice and, in an attempt to produce maximum return on investment, and to follow the remit established by the Corporation of London, would irretrievably damage an important part of the remaining historic fabric of Spitalfields.

The Treatment of the Conservation Area.

1. The application proposes to demolish c.72% of the existing buildings on the site. This will cause substantial harm to the Elder St Conservation Area, a designated Heritage Asset. It will also cause harm to non-designated heritage assets, the non-listed and locally listed buildings within the area.
2. The buildings to be erected fail to respect the predominant height of the Conservation Area, around 3-4 storeys. They vary between 9 and 13 storeys, or roughly three times the existing heights.
3. In addition, the fine grain of the area, a complex mixture of small buildings, courtyards, streets and alleyways, will be replaced by inflexible monolithic structures and an emphasis on large floor plates.
4. The Consented Scheme for the Nicholls & Clarke block, which the developers like to quote as a precedent, is in fact different in many respects, proposing (a) a mixture of 4 - 9 storey buildings, (b) a clear definition and open space between the Blossom St warehouses and the new office building to Norton Folgate, (c) the retention in its entirety of the Northern warehouse and rebuilding floor levels in the Southern warehouse to match.

The Buildings within it.

5. British Land's Application undervalues the importance of the non-listed and locally-listed buildings. The Blossom St warehouses and showrooms are the last surviving examples on the edge of City of London, but British Land's treatment of these buildings reduces them to shells. The Council's own Conservation Area Appraisal states "Assuming that interventions to historic construction are *kept to a minimum*, the creative re-use of these buildings is welcomed."
6. The commercial imperatives of the development insist that they are rebuilt behind a facade – primarily to achieve the alignment of their floor levels with the large building they are to be connected to, creating three enormous office floor plates. The original fabric is to be removed with only a promise to replace "if possible". The fragile historic patina and sense of place will be lost forever. Much the same treatment is applied elsewhere.
7. On Norton Folgate, far from being conserved in a respectful manner, nos.18 & 19 are reduced at ground floor level to a walkway entrance to the plaza behind; and no. 15, the last surviving 18th century building in the street, is adapted to house a toilet block and staircase.
8. The Arts & Crafts Buildings on Folgate St have their more recent back elevations removed, but are rebuilt in a style that suits the courtyard they face, rather than the buildings themselves, and the interiors are extensively remodeled.
9. The new buildings that are to be introduced to the area fail adequately to reflect local building styles and idiom. They are for the most part brick clad steel structures, which will tower over the local landscape but contribute little to it. The new residential building which will comprise nearly 50% of Elder St, one of the most important 18th century streets in London, is ill-articulated and unrefined.

The Consultation Process

10. The developers have made great play of the modifications they have made during the planning process in response to comments from local groups, including the SCG. In reality, these changes are cosmetic, and fail to address the underlying problems.
11. The SCG had focused attention on (1) preserving the Blossom St warehouses in their entirety, inside and out (2) the preservation of the two 18th century buildings on Norton Folgate, and any new building for the corner with Folgate St to be based on historical precedent (3) a number of separate buildings based on historical precedent at the top of Elder St and on Fleur de Lys St.

12. This application proposes (1) to rebuild the warehouses behind a façade, possibly retaining some materials for re-use (2) an entirely contemporary building for the corner, with windows now slightly re-configured ; one of the 18th century buildings demolished, the other housing a staircase and toilets behind a façade (3) one single large building with a design less reflective of local historic style than the one they propose to tear down.
13. It is clear from this that the final proposals entirely fail to meet our expectations and to fulfill our hopes for the site.

Housing & Jobs

14. There is an inadequate mix of use within the development. Thanks to the brief established by the City of London, the proportion of housing is too low – and, within that, the proportion of affordable housing is disappointing, around 25%, (but only 19% of floor area) when LBTH policy is for 35-50%.
15. With regard to jobs, the focus is on office jobs for non-local people - primarily high-income commuters. The percentage of retail use, which might provide local jobs, is hugely outweighed by office use. With regard to both offices and jobs, British Land's application aims to make money at the expense of the needs of the local community.

Amenity Issues

16. There are concerns about the increase of pedestrian footfall through the area and the danger that any new development might permanently change the character of the conservation area. The council should conduct a cumulative impact survey to assess this in the light also of other proposed developments to the north and west of the site.
17. Traffic control measures should be taken to mitigate this impact. Pavement widening should also be considered.
18. In any proposed development, there needs to be careful control of light emission after 11pm, and of the opening hours of restaurants and other establishments serving alcohol, also restricted to 11pm, in keeping with the quiet residential character of the conservation area.

In conclusion, we would emphasize the fragile nature of this important Conservation Area. It retains a strong sense of place, and many building, which, whilst not listed, are evocative of a rich and complex history.

Schemes such as this, driven by the pursuit of profit, can sweep it all away in an instant – and, once gone, it can never be replaced. LBTH acted in the 1970s to

protect Elder St, and the Council's Conservation Area Appraisal seeks to preserve it now.

We would ask the Planning Department to act in the same spirit and prevent this new application from trampling over the area, threatening to lay waste its history, its culture and its vitality.

For and on behalf of the Spitalfields Community Group.