

LESS PLANNING MORE HAPPENING

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Covent Garden Forum of Representatives Response to the GLC Draft Local Plan

Further detailed information is available from the Forum office: 205 Bedford Chambers, The Piazza, WC2 01-836 7017
1 A map with the phasing details indicated 2 Details of the population gain from each of the priorities in Forum's recommendations
A display of the above information and a large explanatory map is also on view at GLC, 1-4 King Street, WC2

Homes/target population - not the numbers game

The GLC while aiming to achieve a residential population of between five and six thousand should not seek to achieve a precise target figure at the expense of other agreed objectives (Forum: 23.9.76).

The target population of 6,000 was first introduced in the 1968 Plan. At that time, it was clear that this substantial increase in population could only be achieved through extensive re-development and by partnership schemes between public authorities and private investors, the latter contributing capital to pay for public amenities and being in turn permitted to carry out profitable development to offset this loss. At the 1971 Public Inquiry and subsequently it was widely felt that the disbenefits of this approach outweighed its advantages. In any case, in the five years since 1971, increasingly severe restraints on borrowing, coupled with the high levels of taxation imposed on most forms of development in 1974, have virtually ruled out the possibility of private investment on this scale for all but a handful of sites.

The current feasibility sites were identified by the GLC in the discussion paper CONSERVATION & DEVELOPMENT (1974) and coincide with some of the re-development areas proposed in the original Draft Plan of 1968. Ironically, we are now discussing the same target population as in 1968 to be achieved on fewer sites, with substantially less re-development. At the same time the Forum has argued consistently for retaining the existing physical fabric of the area, particularly within the two Conservation Areas.

The provision of more homes, while remaining one of the main objectives of the plan, must not be at the expense of other agreed objectives. But does this mean that to conserve the character of the area we need accept a greatly reduced future population, or that the housing gain will have to be put off still further.

NO! It is possible to achieve a major housing gain and conserve the area. This can be done without jeopardising employment or business, if the GLC will abandon its habit of thinking in terms of self-contained sites which have to be developed one by one over a ten-year period.

The Forum wants to see the most wide-ranging and diverse new population brought into this part of Central London, and to achieve this every possible encouragement should be given to anyone willing and able to provide new homes in Covent Garden.

Outdoor open space – Common sense and local initiatives

Urgent steps should be taken by the GLC in consultation with the Arts Council to obtain use of the Tin Market site on the Piazza for a new temporary public open space (Forum: 12.8.76).

The Forum does not in view of the opinions expressed by local residents and workers since 1974 accept the need for a single open space of $1/1\frac{1}{2}$ acres (Forum: 23.9.76).

On the issue of open space clear preferences have been expressed consistently by all sections of the local community. Views have not changed significantly since the 1974 Residential Survey, which made it plain that the provision of a large open space in Covent Garden was not considered necessary (GLC Reports, CG 235 p.6; CG 354 para 30; CG 367 para 23).

The Forum has recently completed a survey about indoor and open space provision (September 1976). The results of this survey show that although people do want the Japanese Water Garden (which had not been completed in 1974) to be replaced by a space of a similar size, they regard the retention of sound buildings as a higher priority and therefore firmly reject the GLC Team's proposals to provide $1/1\frac{1}{2}$ acres of open space on the Mercers site or elsewhere.

If public consultation is to be taken seriously, this is one issue on which the GLC can make a clear decision. The Japanese Water Garden should be replaced with a space of about the same size. The Council should also provide a number of small gardens linked to housing developments, and improve existing courtyards and paved areas.

A great deal in the way of open space has been achieved in Covent Garden by local initiative at very low cost. The GLC should seek new ways in which to further and assist such initiatives. Open space should be provided on the Tin Market until a permanent open space can be established.

If this policy is adopted and the proposals outlined below for indoor public space are achieved, we will have a coherent and concrete set of linked facilities for the first part of the Plan period. It must be recognised that the permanent facilities recommended in the Plan are unlikely to be achieved until a late stage in its implementation.

Indoor public spaces ②

Unlike outdoor space, this is one sphere in which initiatives are traditionally taken by voluntary groups. Within the last two years the Community Centre has been established in Shelton Street and has recently opened a Craft Centre. Street Aid has established the Basement Youth Club in Shelton and Earlham Streets, and the two organisations will shortly open a new recreation facility in the Jubilee Hall – if its life is extended by the GLC. As with some of Street Aid's workshops the latter facility will also be used by local schools to supplement their own, during the daytime.

As with outdoor open space the GLC should seek new ways in which to further and assist local initiatives. As can be seen from the map prepared, this policy would provide the area, within the first five years of the plan, with outdoor and indoor space providing a wide range of uses, which could certainly not be catered for in a large open space, even one of the size of Coram's Fields.

Outdoor public space and indoor facilities in Covent Garden must take into account its central location, and the GLC should move away from the suburban approach of the Greater London Development Plan. In the Forum's recent survey not only did a large majority argue against the proposed $1/1\frac{1}{2}$ -acre public open space, but 64% of the total sample felt there was more need for indoor recreational facilities (75% of residents, and 54% of workers), a view shared by the Greater London and South Eastern Regional Sports Council, who also stress the need for a 'community based' initiative and management.

Business re-location - some commitments please

The GLC should offer businesses displaced by development proposals alternative accommodation in the Council's own premises in Covent Garden subject to the usual negotiations on rent (Forum: 23.9.76).

At no point in the plan are any explicit assurances given to businesses on the question of re-location, yet this is one of the most important issues that has arisen from site meetings over the last six months. There is little point in the GLC's producing policy statements on light industry and employment, if the net effect of its proposals is to reduce employment, or if old-established firms, those providing local services, or small new enterprises have to move out of the area because of other policies. There is no reason why the Council should not commit itself to offering these firms alternative premises at market rental. Indeed it has been argued, and is explicit in some of the Forum's proposals, that the Council should act as an entrepreneur, or enable other agencies to act for it, in the low-cost re-habilitation of warehouses unsuitable for housing, in which space could be earmarked for re-location, light industry, etc. This has already been done in Covent Garden, so why not a little more public enterprise to save displaced businesses and achieve some of the stated objectives for employment and light industry?

It is a fact that rental on the open market will be lower for existing economically re-habilitated warehouse space than it will be for new developments. To take advantage of this differential the Forum is urging the GLC to give preference when letting warehouse space to:

- (a) small businesses displaced through development schemes such as Conduit Court.
- (b) small new firms particularly businesses of a kind traditional in the area.

If the Council takes the initiative in re-habilitating a number of warehouses over the period of the Plan, and if their completion is timed to fit schemes involving displacement, several major objectives can be realised, and some serious contradictions resolved.

- 1 The contradiction between achieving a housing gain on the one hand and maintaining the employment base and small businesses on the other.
- 2 There can be an overall increase in light industry, and a real expansion in the range and diversity which constitutes the 'mixed-use' character of the area.
- 3 While the southern part of Covent Garden develops as an alternative entertainment area to the West End, the

Trade promotion - 3 a clear lack of public enterprise

'Why don't the GLC promote Covent Garden to encourage businesses to move in?'

This question has been asked repeatedly by the Forum since it was set up. The 'simple' answer is that while the Council is able to make policy statements on light industry, small businesses, employment, etc., it is not able to promote London's commercial and industrial advantages owing to restrictions laid down by the Local Government Act 1972 (sect. 144 (3)) and the London Government Act (sect. 73 (3)).

The Forum is now pressing strongly for documentation to be made available to potential new businesses on questions relating to planning applications, licensing, listed buildings consent, policies towards different uses in various parts of Covent Garden, etc. Once this is done, the Forum's Trade Promotion Group will present the GLC with a plan of action identifying whatever public funding may be needed to carry it out, so that we can try and bring about implementation of at least some of the policies relating to business and employment in the area.

Constant re-iteration by all authorities on the need to retain and increase employment, to encourage small businesses and to maintain the traditional pattern of uses is simply fatuous, unless it can be shown how this can be achieved. While these objectives are stated in the Covent Garden Plan, by the Central London Planning Conference, and in the Greater London Development Plan, there is no clear indication of how good intentions will be carried through in practice. Active policies on business re-location and trade promotion should be linked.

whole area can also maintain and expand its role as a 'seed-bed' for small firms, new enterprises, etc.

The Piazza and entertainment route – clear objectives and coherent implementation

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The Piazza should provide London with a new late night entertainment square. Uses around the square should be chosen to generate a lively environment by day and by night but without reproducing unacceptable 'West End' characteristics.

The GLC has put forward a set of policies for the whole area, which are a necessary pre-requisite for co-ordinated action. In contrast, the Piazza, the single most important opportunity in Covent Garden, has no clear policy or guidelines and so far physical proposals such as the Royal Opera House extension and lettings of GLC properties have been put forward on a piecemeal basis. Little or no account has been taken of the role these proposals and uses must play in the creation of a lively new environment.

This is one area where clear planning is essential if we are to realise the full potential of a new London square. This can be achieved in a number of ways:

- (a) By defining those uses which will achieve the objective, e.g. pavement cafés, cinemas, and a wide range of late-night shops.
- (b) In letting policy, specifying uses and opening hours when inviting tenders.

The proposed Royal Opera House extension would have taken up a quarter of the Piazza without providing any activities at street level while at the same time dominating the square. The GLC Covent Garden Committee is to be congratulated for accepting the Forum's recommendations not to grant planning consent to this proposal. It would be disastrous if this decision were to be reversed by the Council. The Forum's resolution was as follows:

This Forum does not oppose extension of the Royal Opera House in principle and appreciates the urgent necessity to improve working and performance conditions. However, it remains unconvinced of the need for an extension of the magnitude proposed in the present application. It therefore requests the GLC Covent Garden Committee to reject the application on the following grounds:

- 1 the absence of any detailed documentation of the kind that has been prepared for other large-scale proposals in the area;
- 2 the impact of the proposed extension on the Piazza;
- 3 the unduly inert character of the arcades at street level;
- 4 details of phasing are insufficient, and there is no guaran-

- tee that each phase of development will leave the building in a complete and self-contained state;
- 5 the bulk of the project and its impact on the core of a conservation area of outstanding status;
- 6 the lack of visual interest and appropriate activity as a contribution to the street scene;
- 7 inappropriate loading through James Street and the Piazza.

The key to the success of the Piazza is to establish a mix of popular and specialist uses. The basis for this could be the popular appeal of the Transport and Theatre Museums in the Flower Market combined with the more specialist appeal of the Royal Opera House. This kind of mix must also be achieved in the lettings policy for the Central Market Building, for the Piazza and for Council-owned properties in the surrounding area. We do not want an area where the very nature of activities excludes certain sectors of the population. The original Royal Opera House scheme would have had this effect, as would a carbon-copy of the Kings Road or of the Burlington Arcade in the Central Market Building.

The Council, which is here in the powerful position of being both owner and planning authority, should operate a lettings policy that is sufficiently sensitive and far-sighted to achieve a real mix, so that the Piazza can provide attraction and entertainment for all. This policy would be realised in the valuation field by adopting the two criteria above, and these would also generate the optimum long-term income. This aim cannot, on the other hand, be realised by the present course of letting piecemeal to the highest bidder.

Feasibility sites - 5 options that balance the priorities

In discussing the GLC proposals for the various feasibility study areas, the Forum tried to obtain the widest possible range of views from all sectors of the community, including the people actually living and working on the sites and thus most directly affected by the proposals. A series of meetings were held on each of the sites. Occupants of these sites (some of whom attended Forum meetings in an advisory capacity) were encouraged to formulate comments of their own. After preliminary consideration by the Forum's Policy Group (which also discussed the alternative proposals put forward by the CGCA as well as the options prepared by the GLC officers), the following recommendations were ratified by the Forum as a whole. The summary of the Forum's conclusions is set out below in the same order as the GLC Team Report Covent Garden Local Plan: Feasibility Studies (CG 552, pp. 5-59).

JUBILEE MARKET SITE

- 1 The site should be used for entertainment, recreation and/or shopping uses in keeping with the Piazza on the lower floors. A housing gain should also be provided, whether by the Council or an alternative agency. Some office use might also be included within the development.
- 2 Development should be so phased as to retain the existing Jubilee Market building until 1982.

MATHEWS YARD SITE

- 1 37-45 Shorts Gardens should be re-developed for housing and commercial use.
- 2 The vacant site in Neal Street (70-74) should be cleared and built on for housing and commercial uses.
- 3 General improvements should be carried out along Neal and Endell Streets; priority should be given to the re-habilitation of Nos. 51-61 Endell Street and 50-52 and 60 Neal Street.
- 4 The GLC should acquire Mathews Yard for housing and open space.
- 5 No new offices should be constructed and office use rights should be transferred elsewhere to maximise housing gain on 70-74 Neal Street and offset its cost.
- 6 The GLC should investigate, with Messrs Latchford's, the possibility of exchanging land for housing and open space purposes.
- 7 In view of the poor condition of housing elsewhere in Neal Street and the possibility of the YMCA building becoming available, the re-habilitation approach should be extended to the rest of the street block to increase housing and amenity use.

TOWER COURT SITE

- 1 The filling station should be proposed for re-development for commercial and residential use, both as an architectural improvement to the Seven Dials and to secure some reduction in traffic flow in Monmouth Street. This would however be expensive and could not be recommended as a high priority in terms of housing gain.
- 2 High priority should be given to the re-habilitation and improvement of existing sub-standard housing on the site, particularly that fronting Tower Court, and enforcement notices served where necessary.
- 3 22 Tower Street should not be developed, but the GLC should discuss with Messrs Comyns environmental improvements to the building and the courtyard, including the possible removal of the unsightly fire escape and also cleaning and painting the building.
- 4 Tower Street should be closed to traffic, except for access, and the carriageway so restored as to reveal the cobbles.

NEALS YARD

- 1 4-5 Neals Yard should be re-developed for access purposes.
- 2 Urgent priority should be given to the re-habilitation of 27-29 Monmouth Street.
- 3 Priority should be given to clearing and developing the three vacant pieces of land on the site, for shops and housing.
- 4 8-10 Neals Yard should be acquired by the Council and re-habitated by the GLC or by an alternative agency for light industrial use.
- 5 Priority should be given to the re-habilitation and improvement of existing sub-standard housing, particularly that fronting Monmouth Street, and to bringing back into active use vacant residential units, and acquisition or enforcement action should be authorised as appropriate.
- 6 It was noted that this site was unique among the study areas in producing a satisfactory financial outcome, and should therefore receive high priority owing to the low capital expenditure. Early action was therefore recommended when the site was considered and is re-inforced in view of the priorities set out above under phasing, and the emphasis placed on the Seven Dials area as a whole.

The above three sites should be given high priority as they fall within the Seven Dials area. The Forum has not yet discussed in detail other forms of improvements for this area, but these could, for example, include re-placing the Dials, restoring the asphalted pavement with paving stones, and revealing the cobbles throughout the area as a general environmental improvement and at the same time an effective form of discouragement to through traffic.

It should also be noted that the Forum has given support to the proposed scheme put forward by Messrs Comyn Ching for the Mercer St./Shelton St./Monmouth St. triangle, and that this site will also include a small garden. The Forum viewed this scheme with admiration as one in which the main aims of the local plan would be achieved by the owner-occupiers, on a difficult site with a significant housing gain and at no cost to the Council.

CONDUIT COURT / BANBURY COURT

- 1 The GLC should enter into early negotiations with Christ's Hospital in order to re-develop the whole site to achieve a major housing gain, Floral Street being considered an excellent location for housing.
- 2 Wherever possible existing businesses should be re-located within the site.

LANGLEY COURT

Consideration should be given to withdrawing Langley Court from the list of feasibility study areas. The Forum was not convinced of the need for its inclusion and instead recommended the following strategy for the site :

- 1 Owners and occupiers should be encouraged to re-habilitate buildings for residential and commercial use.
- 2 In those cases where owners of vacant buildings prove unwilling to bring these back into use at an early date, the premises should be acquired by the GLC.
- 3 In the event of the GLC Committee's proceeding with action along the lines of the preferred option, development and re-habilitation should be so phased as to permit the successive re-location of existing users within the site.

THE MERCERS SITES

The Forum, in view of its recommendation on public open space, would like to see new options prepared for this site along the following lines :

- 1 A housing gain to be obtained at no cost to the community.
- 2 Existing good quality housing to be retained and good grounds advanced for any demolition of listed buildings.
- 3 Up to two-thirds of an acre of public open space to be incorporated.
- 4 The GLC to enter into planning gain agreements to obtain increased housing through re-habilitation and re-development as appropriate.

NOTTINGHAM COURT

- 1 Re-develop 43 Shelton Street for housing and shops.
- 2 Provide new housing on vacant sites, and on top of the commercial building on the corner of Endell Street /Shorts Gardens.
- 3 Transfer some office uses rights off the site so as to increase the housing content without the buildings exceeding the scale of those now on the site.
- 4 Discuss this approach fully with the occupants so as to minimise disruption on the site, and give guarantees for the re-location in Covent Garden of any businesses who may be forced to move out.
- 5 Release 37 / 39 Endell Street for re-habilitation for housing use as soon as possible.
- 6 Begin enforcement action on 27 Endell Street immediately to reverse unauthorised non-residential use of upper floors.

Implementation of the Plan - a clear set of priorities

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- 1 In order to facilitate a major and speedy housing gain and to achieve major environmental improvements within the first five years of the Plan the GLC should adopt the following priorities :
 - (a) Development /re-habilitation of the properties within the feasibility sites, listed below.
 - (b) Development of vacant land within the feasibility sites.
 - (c) Properties outside the feasibility sites, listed below.
 - (d) Development of sites within the Seven Dials area.
 - (e) Continuous acquisition throughout Covent Garden of properties for housing gain as and when opportunities arise.
 - (f) Re-habilitation of buildings for housing gain within the feasibility sites.
- 2 There should be a general priority in favour of achieving housing gain and environmental improvements within the Seven Dials area. In addition to the declaration of a housing action area consideration should also be given to establishing a 'Town Scheme' for the area. (Forum : 23.9.76)
- 3 The Council should do all within its power to encourage proposals for housing gains from other agencies, including the private sector. Planning gain agreements which provide increased housing through re-habilitation may be viewed with favour. The forum wants to see the most wide-ranging and diverse new population brought into this part of central London, and to achieve this every possible encouragement consistent with the other Policies of the plan should be given to anyone willing and able to provide new homes in Covent Garden. (Forum : 14.10.76)

The establishment of a set of priorities which includes identifying buildings, vacant land, and individual sites throughout Covent Garden where immediate action can proceed leads us away from the hitherto accepted ground-rule of treating the area as a series of self-contained sites.

What this means is a programme of action which is not confined solely to sites around which boundaries have been drawn. Action should proceed from the real priorities which have now been identified. At the same time the designation of feasibility sites will be the basis of the Action Area Plan and thereby facilitate compulsory purchase where necessary. The implementation of these priorities is set out below in the form of parallel phasing with details of a ten-year programme.

Implementation of the Plan - parallel phasing 7

The general approach to phasing the Plan should not be based on serial development of a succession of sites. The clear priorities set out above call for a co-ordinated programme of development to take place on a variety of sites throughout the area at the same time (Forum: 23.9.76).

Priority 1: Developments currently under way (excluding Seven Dials)

Population gain 804

Priority 2: (a) Development/rehabilitation of properties listed within the feasibility study areas

(b) Vacant land within the feasibility study areas (Nottingham Court and Parker St. sites)

(c) Development/rehabilitation of properties lying outside the feasibility sites but identified for action

(d) Sites within the Seven Dials area (including 4 gardens)

1976/81 Total population gain 1,844

Priority 3: Conduit Court

Mercers site

Jubilee Market site

1981/6 Total population gain 732/892

Up to now phasing has been identifying certain 'ripe'/'potential' sites, which are then treated as self-contained development blocks and by definition have to be developed one after the other during a defined plan period. This general approach has persisted since 1968 in spite of numerous objections to the drawing of lines round often arbitrary areas. Although we are now presented with a wider variety of possible approaches (in the form of three options for most sites) there is inevitable pressure for major disruption on a number of sites: discussion being motivated by the target population of 6,000 instead of being based on what can actually be achieved on each site within the framework of agreed policies (i.e. housing gain, conservation, safeguarding the employment base and re-locating businesses wherever possible, small open spaces linked to new developments, etc.).

If the general approach for the sites is as indicated below, and the GLC adopts the parallel form of phasing which the Forum suggests, then this co-ordinated approach to the whole area would lift obvious blight at an early stage (vacant land, empty buildings, etc.), and would deal with the priorities set out on a number of sites simultaneously, while at the same time making action outside these sites possible within the same period.

The Forum is therefore suggesting in the first five years of the Plan, a comprehensive programme to take advantage of what is possible now, a programme that will achieve major housing gains and environmental improvements in the northern part of Covent Garden, while the southern part of the area evolves in parallel with the gradual development of the Piazza. A co-ordinated programme of action on these lines would not have the effect of reducing the gain in residential population; there may even be scope for increasing still further in the long term.

What is called for is action that respects and seeks to build on the existing social, economic and physical fabric of Covent Garden, and views it in a more organic light. Since 1968 we have been presented with proposals involving varying degrees of transplant and amputation. Admittedly the scale of the suggested amputations has diminished but the scalpel is still very much in existence in most of the first two options suggested by the planners for the feasibility sites.

The Forum is now pressing for an expanded section in the new Plan dealing with the Piazza, its associated buildings and the entertainment route. In the case of the Piazza we are dealing with a largely 'city-centre' late-night entertainment area. Many of the criteria behind our priorities are also present in the Seven Dials conservation area (recently declared officially to be of outstanding status), where we are dealing with 7 sites with a housing gain for over 500 people and 4 small new gardens. The arguments for giving emphasis to Seven Dials within the first five years of the Plan are: the general support given to the establishment of a Housing Action Area; the sub-standard condition of much of the housing stock; the possibility of major environmental improvements; the possibility of grants being available as a result of the outstanding status of the conservation area; the number of empty housing units and vacant sites; the historic role of the Seven Dials area in terms of population in Covent Garden; and the opportunity of providing gardens linked to housing developments.

Within the context of the general priorities set out, this approach would make possible a fair allocation of resources between mid and north Covent Garden within the Plan period, with the southern area (the Piazza) gradually developing throughout the period. It should be remembered that since 1968 there has been general agreement that the north part of Covent Garden would provide a major element of the housing gain and is a suitable case for urgent treatment on a number of grounds. Yet while paperwork on the Plan has proliferated, the vacant sites of Seven Dials provide in Covent Garden rare examples of sturdily growing trees, some of them more than 30 years old.

This approach would be realised as follows:

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Priority 1:

Developments currently under way (excluding Seven Dials)

35 King Street
Bedfordbury
Ex-Market Buildings
Odhams
Newton Street
Dudley House
Bedford Chambers

Priority 2A:

Development/Re-habilitation of properties listed within feasibility sites

Mathews Yard
51-61 Endell Street
50, 52, 60 Neal Street
Tower Court
5, 6, 8, 10 Tower Court
16, 18 Earlham Street
Neals Yard
23, 27, 29, 35, 37, 39 Monmouth Street
Langley Court
33, 37, 38 Floral Street
32, 33, 35, 36 Long Acre
Nottingham Court
37, 39 Endell Street
27 Endell Street (enforcement)
Bell Hotel
174-183 Drury Lane
4-14 Stukeley Street
17 Macklin Street

Priority 2B:

Development of vacant land within the feasibility sites

Mathews Yard
72-74 Neal Street
Neals Yard
3 Shorts Gardens
51, 53 Neal Street
31, 33 Monmouth Street
Nottingham Court
Corner Shelton/Endell Streets
Corner Shorts Gardens/Nottingham Court
Parker Street
Vacant sites
Bell Hotel
Goldsmith's Buildings

Priority 2C:

Development/Re-habilitation of properties identified outside the feasibility sites

1: 1, 2, 3 Tower Street; 30 West Street; 8 Earlham Street
2: 23 Macklin Street
3: 14, 16, 18 Monmouth Street
4: Extension of the re-habilitation approach within the Mathews Yard block to the north of the feasibility site boundary
5: 57-63 Shelton Street

Priority 2D:

Sites within the Seven Dials area (* garden)

Tower Court*
Mathews Yard*
Neals Yard
Comyn Ching*
Earlham Street warehouse
36, 38, 40 Earlham Street
Nottingham Court*
Shaftesbury Avenue/Mercer Street

TOTAL POPULATION GAIN 1976/81 1,844

Priority 4:

Conduit Court
Mercers site
Jubilee Market
37-45 Shorts Gardens
43 Shelton Street
39-41 Endell Street (above)

TOTAL POPULATION GAIN 1981/6 732/892

ESTIMATED TOTAL 1986 5,376/5,539
(Base of 2,800, 1975)

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