

Save Museum Street Coalition is a cross community coalition of the following organisations and major land holders:

Covent Garden Community Assoc. Bloomsbury Assoc. Save Bloomsbury Soho Society Leicester Square Assoc. South Bloomsbury Tenants & Residents Assoc. Climate Change Camden Tavistock Chambers Residents Assoc.

The Bedford Estates Covent Garden Area Trust BRAG Charlotte Street Assoc. Dudley Court Tenants Assoc. Drury Lane Residents.

April 2022

Dear Jenny Rowlands

The environmental impact of the latest proposals for a 74 metre high speculative tower block close by the British Museum.

We attached a detailed report written by the pre-eminent environmental specialist, Simon Sturgis, director of Targeting Zero who gave expert evidence at the Marks and Spencer Public Enquiry.

The developers BC Partners, recently published a report to justify their redevelopment proposals, entitled "Retention v Redevelopment" which sought to 'prove' that their new office tower would be more sustainable than a scheme that sought to retain and retrofit the existing building.

Simon Sturgis's assessment, entitled "The Carbon Case for Retention and Retrofit", meticulously debunks the developer's report and shows it for what it is, namely a sophisticated publicity gimmick that seeks to provide an aura of respectability, "greenwash", for a grossly irresponsible development that is driven solely by maximising profit..

Simon Sturgis, throws down a challenge to The London Borough of Camden in his report saying,

Camden must decide what it believes in. Do they decide in favour of achieving net zero at a faster pace than the UK Government as they claim, or do they decide in favour of the developers whose proposal is to optimise site value with no serious regard for climatic or carbon impacts?'

The site in guestion, One Museum Street (Camden Planning reference 2021/2954/P), is bounded by New Oxford Street, High Holborn, Museum Street (leading to the British Museum) and Grape Street. Part of the

site is within the Bloomsbury Conservation area and contains a number of mid 1840's buildings, some of which have very recently been granted Grade II status by Historic England. The largest building on the site is Selkirk House, originally the 1960s headquarters of Trust House Forte and subsequently converted for hotel use by Travelodge. The proposal is to demolish this very large, robust, concrete structure, which is merely 58 years old and replace it with 26 m taller and bulkier new office block clad in highly energy-intensive anodised aluminium.

The development proposal has already been widely criticised by local and national bodies including Historic England, the Victorian Society, The Georgian Society and Save Britain's Heritage for its inappropriateness in the context of the surrounding conservation areas of Covent Garden, Bloomsbury and Soho and its proximity to Grade I and Grade II listed buildings. Simon Sturgis adds weight to the controversy with his devastating assessment of the developers' flimsy arguments for its alleged sustainability.

Simon Sturgis reproaches the developers, BC Partners, for their failure to establish the claims they make for the sustainability of their scheme. In summary he states:

The proposed demolition is in carbon terms against UK National Policy, Greater London Authority's (GLA) Policies and intentions, and Camden Council's declared climate and ecological emergency

and its resulting policies and intentions

- That there is ample policy at national, GLA and local level to reject the developers' proposals
- The developers' report contains specific errors and inaccuracies. It fails to record that it does not come anywhere near meeting Camden Council's own sustainability commitments, contains a plethora of incorrect assumptions leading to incorrect and misleading carbon assessments, inaccurate retrofit/new build comparisons and to crown it all inaccurate claims about the circular economy. The report shows that the development scheme fails to meet the whole life carbon benchmarks of The London Energy Transformation Initiative (LETI), the Royal Institute of British Architects (RIBA), and the GLA, and has a carbon cost per m², of 1294 kgCO2e/m², which is exceptionally high and **outside LETI / RIBA / GLA Aspirational Targets**
- There is sufficient UK national, GLA, and local Camden policy to enable Camden to **reject** this submission in favour of a major retrofit. This approach would be lower in carbon emissions, result in significantly less waste, and be quicker to market. There are grounds for refusal, but this is a choice that Camden has so far failed to take.

The London Borough of Camden should require a positive forward-looking architectural proposal and whole life carbon assessment to be produced showing how the existing Selkirk House, 1 Museum Street, can be reused, repurposed and retrofitted with an open mind on use types to achieve a retrofit proposal. The central premise should be to retain most of the existing structure and add to or adapt this creatively. This may not produce the level of profit that the developers wish, but it will produce a better scheme at far less environmental cost.

António Guterres, Secretary General of the United Nations, when unveiling the latest Panel on Climate Change report on March 20, 2023, stated that time is running out very fast and that humanity 'is on thin iceand the ice is melting fast'. He called for leaders of developed countries to make the commitment to reaching net zero as close as possible to 2040, ten years earlier than the UK's current target, if there is to be any chance of thwarting the impending disaster. *He specifically highlighted the construction industry must achieve this target.*

Sturgis shows in his report that the developers' proposals for One Museum Street will be grossly over the UK Government's 1990-2050 trajectory, let alone the required speeded up 2040 date that the UN says we must reach to stave off climate disaster. (See page 5 of his report attached).

We do hope that Camden's Climate Emergency statements are not yet more "Blah, Blah" as Greta Thunberg memorably describes political leaders that say the right thing but fail to act when faced with a choice. Certainly, the Labour Group at Camden has to take a stand on whether their statements are meaningful or just more Blah Blah.

We hope that for all the reasons contained in the report and in this letter, you will ensure the developers' current proposals are rejected.

If you would like further information please do get in touch.

Yours sincerely,

Kathy Doyle

On behalf of the Save Museum Street Coalition m. 07771513983