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**Delivered via Email**

David Fowler  
Deputy Team Leader  
Regeneration and Planning  
London Borough of Camden  
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c/o Town Hall, Judd Street  
London  
WC1H 9JE

Dear David,

**OBJECTION ON BEHALF OF THE LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE TO PLANNING APPLICATION REF. 2023/2510/P**

On behalf of the London School of Economics and Political Science ("LSE"), we submit this objection to application ref. 2023/2510/P at Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London WC1A 1JR ("the site"). Please note this letter has a minor update to the heritage section and therefore replaces the letter issued on 29<sup>th</sup> March.

LSE has carefully reviewed the planning application for the sites redevelopment and are concerned about a number of specific effects that would be generated by the proposed development.

LSE object on the grounds of the proposed height of the development and the substantial heritage harm this causes on the Bloomsbury Conservation Area. Furthermore, the proposed development is considered to impact upon our students Halls of Residence at 178 High Holborn, London WC1V 7AA ("LSE High Holborn").



#### **Proposed Massing and Heritage Harm**

LSE fully endorse Historic England's objection dated 4 August 2021 and their subsequent updated letter dated 3 November 2022, in particular their comments that the proposed development even though reduced slightly in height would *"have a marked impact on Bloomsbury Conservation Area through the contrast in scale and exacerbation of the visual discordance of Selkirk House....its presence would have a major negative impact on some of the most important elements of this large and highly historic place."* Historic England go onto state that *"the increase in the proposed tower's footprint negates some of the reduced harm to the conservation area through the removal of the top two floors"*.

The Bloomsbury Conservation Area is considered to be the most important conservation area in Camden and one of the most important conservation areas in the capital and indeed the UK. At 19 Storeys in height, it is considered the Museum Street block would fail to enhance or protect the character of the Bloomsbury Conservation Area and presents as an incongruous development significantly taller than the surrounding built context. Whilst the latest elevational design revisions of this block submitted in February 2023 are welcomed, it is not considered the development would lead to anything other than substantial harm to the Conservation Area unless the Museum Street block is significantly reduced in height.

By protruding above the roofline at the eastern section of Somerset House it is considered the development causes significant harm to the setting of the Grade I Listed Somerset House and of strategic view 16A.1 of the LVMF.

#### **Daylight Sunlight Effects**

The Daylight Sunlight Assessment submitted with the planning application, prepared by GIA, assesses the daylight and sunlight effects of the proposed development upon LSE High Holborn.

The Analysis identifies that only 20% of rooms within the LSE High Holborn would pass the BRE Guidelines for Vertical Sky Component with 13 windows experiencing changes in excess of 40%. The only justification given by GIA for these significant reductions in VSC is that *"the Site has been designated for development and growth and this element of the Site has been allocated for redevelopment, lower daylight values to this property are expected should any meaningful massing be achieved on the Site."* A further 5 bedrooms experience a reduction in No Sky Line in excess of 40%, which is justified by GIA on the basis of the transient nature of student residences.

LSE as an institution recognise the importance to our students wellbeing and of housing them in high quality accommodation that benefits from excellent internal standards including good levels of daylight and sunlight. Many of the LSE students who stay in our accommodation reside in our accommodation for the whole period of their time at the LSE and our accommodation at High Holborn in particular is highly sought after amongst our students due to its convenient location within 400m of the LSE campus.



It is not considered that the generic statement that student accommodation is transient in nature justifies such high magnitude impacts upon the daylight amenity of the LSE High Holborn Residents. LSE would like to highlight that bedrooms are students primary private living areas within a halls of residence and the use of their rooms is not limited to primarily night-time. As such students amenity is particularly sensitive to changes the levels of daylight and sunlight that are received by their bedrooms. We consider the changes that are experienced to the bedrooms at LSE High Holborn are too significant in their effects to be considered for approval in its current arrangement without changes to lessen the effects of the proposed development on our students.

#### **Delivery & Servicing Management**

The submitted development proposes that the access to the single servicing lift to the internal basement loading bay is located directly opposite LSE High Holborn.

It is noted within the submitted Delivery and Servicing Management Plan (DSMP), prepared by Arup, it contains a framework access/egress process for accessing this lift, including a time slot booking system and a requirement to call the lift operative two minutes prior to reaching the lift, (to help ensure there is no queuing on High Holborn when accessing the lift).

However, the process does not include any protocol for when a vehicle hasn't booked or called in advance arrives to use the servicing lift whilst another vehicle is already using, therefore contains no contingency plan to prevent queuing on High Holborn in this situation. LSE note that no reference has been made within the DSMP to the term time movement of students into and out of their accommodation and we would request that LSE is consulted as part of any ongoing plans dealing with construction and operational effects.

LSE therefore request this is addressed to maintain highway safety outside their residence.

#### **Noise & Vibration Impact Assessment**

The Noise and Vibration Impact Assessment (NVIA), prepared by Scotch Partners, does not assess the impact of the proposed developments operational plant/noise emissions on the LSE High Holborn or acknowledge it as a noise sensitive receptor.

LSE therefore request the NVIA is updated to assess the impact of noise and vibration from the proposed development upon their residence.

#### **Trees**

It is noted that to accommodate the introduction of the vehicle lift on High Holborn, two of the existing trees on High Holborn are proposed to be removed, with two replacement trees proposed to replace these further along on the High Holborn pavement. These proposed trees are of a much smaller nature than the existing mature trees which includes a CAT B tree.

This is considered important on the basis that the submitted Environmental Wind Planning Report, prepared by Arup, identifies that the receptors outside LSE High Holborn will change slightly with the wind conditions worsening. The change will mean that outside the LSE, the space will be comfortable for standing, with some areas now only comfortable for strolling. It is considered this can be mitigated through proposing like for like replacements of the street trees at this location.





LSE therefore object to the replacement of the existing High Holborn street trees with those of a lower amenity value.

**Air Quality**

The submitted Air Quality Assessment, prepared by Arup, identifies that the demolition phase of construction, should planning permission be granted, would pose a medium risk to human health, particularly for receptors within 20m of the site, such as at LSE High Holborn.

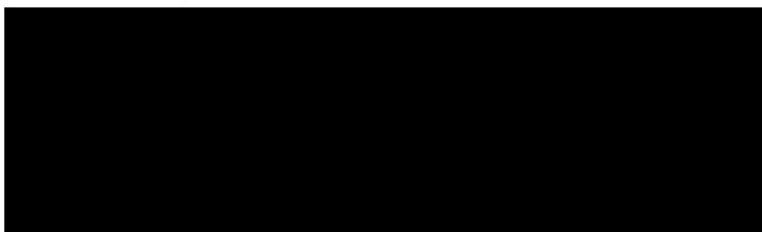
LSE therefore request that stringent dust mitigation measures are required during any demolition works and that air quality effects are measured on a daily basis.

**Conclusion**

In summary, LSE submit this objection to application ref. 2023/2510/P on the basis of the substantial heritage harm the development causes to the Bloomsbury Conservation Area; the unacceptable high magnitude daylight impacts the development has on LSE High Holborn; the potential impact on highways safety on High Holborn; the failure to assess the impact of the proposed developments operational plant/noise emissions on LSE High Holborn; the loss of the existing High Holborn street trees for those of a lower amenity value and the air quality impacts of the proposed demolition of the site upon LSE High Holborn.

We would welcome the opportunity to discuss this objection further should you have any queries.

Yours sincerely,



Richard Jenden  
**Director of Property and Space Strategy**

