

From: pbloxham

Sent: 25 July 2023 23:40

To: David Fowler

Cc: Planning

Subject: Re: Composite Planning Applications (Planning Applications) in respect of proposals for the development of a series of plots bounded by High Holborn, Museum Street, New Oxford Street and West Central Street including Selkirk House, Museum Street (now refe

Dear Mr Fowler,

It looks as if the decision which will be put forward to the planning committee to take (and any recommendation emanating from the planning team) will be one which has, to a considerable extent, to weigh certain limited tangible potential benefits from the Applications (assuming the proposals are executed in full and without subsequent modifications) against a series of negative consequences, some of which, whilst very significant, are more intangible in nature.

The tangible potential claimed benefits would consist principally in the increased quantity of housing which would be generated, assuming the Applications are carried out as contemplated by the proposals. I understand that it is now accepted that the current housing component originally reported by Labtech was incorrect but that there is now an agreed, higher, figure.

The consequential detriments would include (this is not an exhaustive list):

- The negative impact on the Bloomsbury Conservation Area and on important adjoining heritage buildings and monuments nearby;
- The negative impact on views in central London;
- The negative environmental and sustainability impact (I am conscious that Camden has declared a climate emergency);
- The carbon impact;
- Loss of light and privacy for local residents;
- The opposition from those who live in the area and know the area best, including as a result of responses to Camden's own site allocations consultation;
- The loss of amenity (and dangers) for residents and local businesses for an indeterminate number of years during the demolition and construction phases.

I am not sure whether the quality of the housing proposed to be provided falls to be taken into account.

Nor do I know if you need to factor in the risk (based on experience with other complex and inadequately planned projects) that the project may end up not being completed as contemplated by the Applications.

I assume that it is not legitimate to include in the balancing exercise the purely financial benefit to the Council which might arise from granting the Applications, in terms of CIL or business rates.

It is not easy to arrive at a fair and reasonable recommendation or determination when you are weighing factors which are not strictly comparable.

The purpose of this email is to enquire whether the Council (or indeed collective local government bodies or central government) has adopted policies or guidelines to assist those faced with such a difficult decision.

Any analysis of the Applications from this weighting point of view will need to have regard to the conclusions reached by the Secretary of State in the recent *Marks and Spencer Oxford Street* case, as well as the reasoning underlying the Secretary of State's decision.

Whilst expressly not a precedent, the decision does provide a useful illustration of the limits on what can be an acceptable trade off. If one focuses solely on the heritage aspect of the decision, the Secretary of State has made clear that, in such cases, the harm to heritage assets should be accorded "very great" and "significant" weight. In this context, it must be indisputable that Selfridges is an important art deco building but does not have the historic, heritage or cultural importance of, for example, St George's Bloomsbury and the British Museum, or of other places in central London, views from which would be permanently damaged.

If any guidelines to assist in reaching decisions in cases such as this do exist, will they be revised in the light of the Marks and Spencer decision?

Some might wish to add to the "benefits" side of the equation the creation of Vine Lane, but although this concept has been proposed by the Council as part of the redevelopment of the area, there is significant opposition to the proposal, both in terms of responses to the application when it was made in 2021 and submissions resulting from consultations carried out by Camden, so it is not clear whether the creation of Vine Lane could be ranked as a benefit, even if its proposed status were clearer.

I appreciate this is a highly simplistic analysis (in terms of all the factors which have to be considered by Camden) and there are many other factors (including

the embodied carbon question) which have to be weighed up both by the planning team and by others within Camden in coming up with any recommendation and by the planning committee in reaching any reliable decision.

I look forward to hearing from you.

Many thanks

Regards

Peter Bloxham