

**The Flat 3
Queen Alexandra Mansions
Grape Street
London WC2H 8DX**

London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

5 April 2023

Dear Sirs

Re: Composite Planning Applications (*Composite 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 (originally Labtech application 2021/ 2954 P)

I refer to my letters of 21 and 28 February and look forward to hearing from you in response to these and all other outstanding matters.

In the meanwhile, I am pleased to note that the model of the proposed BC Partners development is now at last on display in the window of Selkirk House.

It is very significant that BC Partners and its advisers did eventually agree to this, as it reveals a number of problems with the various proposals bundled together into the Composite Planning Applications which would not have been apparent to an affected layman from a review of the printed materials forming part of the Composite Planning Applications. Importantly, the model reveals that the understandable focus on the proposed 74 metre skyscraper has distracted attention from significant problems in relation to other aspects of the proposals in the Composite Planning Applications. The Composite Planning Applications are in fact several complex and controversial

proposals wrapped into one. Some of the wider problems with the Composite Planning applications are identified below.

I assume that the model is to uniform scale. Some aspects of it, notably the open space in the courtyard inside the buildings within the Bloomsbury Conservation Area, seem disproportionate.

I hope to have the opportunity to inspect the model in more detail from inside Selkirk House, when access is provided, but, in the meanwhile, I set out below my observations, based on an inspection of the model from the pavement.

I have divided them into two parts.

Concerning the proposed Skyscraper

The model makes very clear that the height of the proposed skyscraper is wholly out of proportion with the rest of the surrounding buildings. This proposal is completely insensitive to its environment. This is the case generally; the fact that the skyscraper would tower over the Bloomsbury Conservation Area, the boundary of which is just a few yards from the site of the proposed skyscraper, only makes the proposal all the more egregious. It is noteworthy that these sentiments are widely recorded in your colleagues' recent summaries of the responses to the site allocation consultation conducted by Camden relating to these plots.

The sheer bulk of the proposed skyscraper is also problematic and out of keeping with any surrounding structures.

There are two other existing structures in the vicinity which, in terms of size and conspicuousness, would be comparable with the BC Partners' proposed skyscraper. These are Centre Point and Central St Giles (which, we were told during the planning process, would blend in with its surroundings). There is at least one significant difference between both these structures and BC Partners' proposed skyscraper. This relates to the amount of associated public realm space at ground level. Centre Point has a generous piazza in front and around it. The Central St Giles open space is within the complex. By contrast, BC Partners' skyscraper would merely have what is, in effect, a slightly enlarged pavement around it plus a narrow, dark and potentially unsafe passage down one side. The High Holborn/ Museum Street site is simply too small and confined for the overweening financial ambitions of BC Partners and its demanding private equity investors.

The proposed skyscraper would cast shadows over densely packed surrounding buildings. In this context, the architects have been very reticent about providing images showing how much of a dark shadow the proposed skyscraper would create. It is hard to reconcile the scale of the proposed skyscraper with the images which have been generated by the BC Partners' team of sunshine in close proximity, notably within the courtyard inside the buildings in the plots within the Bloomsbury Conservation Area.

There would be issues of loss of privacy and loss of natural light for those resident in West Central Street and Grape Street, as well, potentially, as those occupying the new residential properties in the plots forming part of the Bloomsbury Conservation Area. The loss of light (as well as privacy) problem might extend to the LSE accommodation on High Holborn, as well as to any bedrooms there may be in the Travelodge Drury Lane which have windows on High Holborn.

The proposed skyscraper would create a large amount of light pollution, over a wide area, including public and open spaces and a number of listed buildings.

The terraces proposed may need to be re-thought in the light of the recent *Tate Modern* case.

Concerning other aspects of the Composite Planning Applications

One thing which the model demonstrates very clearly is that the Composite Planning Applications relate to a number of diverse plots, geographically proximate and apparently in single ownership but otherwise very disparate. Each plot deserves individual attention. BC Partners have sought to present the Composite Planning Applications as a single proposal, blurring the heritage, architectural and civic distinctions (as well as the previous uses) between the various existing buildings. This confusion needs to be unravelled in order to make an intelligent assessment of the Composite Planning Applications.

The proposals in the Composite Planning Applications would create a dark and potentially dangerous canyon in what is now West Central Street and the proposed Vine Lane passage. Lack of safety seems to be acknowledged by those propounding the Composite Planning Application. It remains to be explained whether this Vine Lane passage would be public or private property and who would bear the cost of security and upkeep. To date it is hard to reconcile contradictory statements by Camden and Simten respectively.

In this connection, Simten have claimed that the purpose (for them) of creating Vine Lane is to provide light to part of the new skyscraper (and possibly the new buildings

proposed on the west side of West Central Street). It is hard to believe, based on the model, that the narrow Vine Lane passage would provide any significant degree of light to any of the new structures.

The model also provides an opportunity to consider the many issues which arise in relation to the proposed new structures on the west side of West Central Street (**WCS Structures**). As a Grape Street resident, I have been asking questions about this ever since Labtech made public its plans (see my letter of 29 December 2020, which is incorporated by reference into this submission; let me know if you need another copy). More recently, I have asked Simten for a separate presentation about these aspects of the Composite Planning Applications and am waiting for responses from Simten. These proposed structures should perhaps be the subject of a separate application, so that they can be subject to a proper degree of detailed scrutiny.

Quite apart from the problems associated with demolition and construction in a narrow site so close to existing residential properties, the following issues arise.

The WCS Structures are too high.

The model demonstrates that the new structures proposed, some of which would back on to Grape Street and be along the west side of West Central Street (as well as in the proposed Vine Lane passage) would consist of two blocks, one (the southerly one) considerably taller than the other. The southerly one seems to have been conceived without taking any account of the scale and height of the heritage buildings in Grape Street. It may cast its own shadows.

There must be questions whether several of the new units in the WCS Structures would have adequate light and would comply with the Council's requirements in this respect.

There are likely to be to be issues of loss of light and overshadowing for some existing Grape Street and West Central Street residents.

There may also be questions of loss of privacy for some existing Grape Street and West Central Street residents. I note that some of the proposed WCS structures would have windows looking into Grape Street.

The existing Fire Station residential building in West Central Street has south facing windows which would seem to be eliminated (or deprived of light) under these proposals.

The model seems to be proposing a new structure in West Central Street, where it turns the corner (and within the existing Bloomsbury Conservation Area). The new corner structure would appear to be taller than the existing structures (some now listed) in that northern block. There is no justification for this increase in height in such a sensitive location. Assuming it is permissible to destroy and rebuild in this section of the plots covered by the Composite Planning Applications, any new structure should be aligned (at the highest) with the median height of the structures within this section of the Bloomsbury Conservation Area.

It is unclear what is the status of the narrow and potentially very dark void between the back of Grape Street and the rear of the northernmost of the proposed WCS Structures. Nor is it clear how access to the rear wall of Grape Street would be obtained should the WCS Structures be erected.

I understand that there may also be electricity substations placed every close to residential properties. I have raised concerns about this.

One particular structural issue which needs to be clarified is that some of the WCS Structures appear to be proposed to be erected over what is currently a downwards ramp at the rear of Grape Street, which descends into a former parking garage. BC Partners need to explain how the proposed new WCS Structures would be supported and to what extent this would require pile driving (or similarly invasive and nuisance causing activity) only metres from existing residential buildings.

At this stage, I am not commenting on any part of the model in relation to the recently listed buildings as I assume the proposals will have to be revised.

I will write further once I have had an opportunity to study the model in more detail from inside Selkirk House.

It is not possible from the model to make any comments about the design (or suitability, in context) of the structures proposed, or their technical environmental impact.

Please treat this as a supplemental submission in support of my objections to the Composite Planning Applications. The model only reinforces my view that the proposals embodied in the Composite Planning Applications are thoroughly misguided and cannot be reconciled with Camden's own policies or those of central government.

In any event, it is clear that there remains a huge amount of work to be done, and transparency provided by BC Partners, before an informed assessment can be made of the Composite Planning Applications.

I am copying BC Partners and Simten.

Yours faithfully,

Peter Bloxham