



Historic England

Mr David Fowler
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3093

Our ref: P01562179

28 July 2023

Dear Mr Fowler

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**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
Application No. 2023/2510/P**

Thank you for your letter of 27 June 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Bloomsbury is one of London's most distinctive and special historic places, characterised by its formal streets and garden squares of late-Georgian terraced housing alongside world-famous cultural institutions. The application site straddles the southern edge of the Bloomsbury Conservation Area, to which the historic buildings of the West Central Street block contribute considerably - most of them also Grade II listed - and from which Selkirk House, in their backdrop, detracts.

The proposals would replace Selkirk House with a tall building of 19 storeys and a new pedestrian route. Residential and commercial uses would be reinstated to listed buildings in the West Central Street block through a mix of restoration and alteration, save for a group of unlisted historic ancillary buildings that would be demolished and replaced with a six-storey housing block. The proposals would harm the conservation area and, through their settings, multiple listed buildings by the considerable increase in the tall building's height and bulk, while new positive works of conservation to the listed buildings of the West Central Street block are set against the harmful effects of demolition and alteration.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Policy is clear that harm to the many designated heritage assets affected directly and through their settings should be avoided, including where the harm is 'less than substantial', and that it requires robust justification. Local policy aims at resisting harm to designated heritage assets.

Historic England has serious concerns about the harmful impact of the proposals on a wide range of designated heritage assets. We object to the application and urge your authority to seek alternative ways to deliver their benefits.

Historic England Advice

Significance of the heritage assets

The proposed development concerns the southern fringe of Bloomsbury, which is one of London's most distinctive and special historic places. Its main formal streets and garden squares of late-Georgian terraced housing and world-famous cultural institutions are protected by the Bloomsbury Conservation Area. This extensive designation also contains important Victorian and modern buildings and urbanism. It is one of the most important conservation areas in London.

The site is dominated to the south by Selkirk House, a poor-quality tall building from the 1970s. It stands just outside the conservation area, but appears incongruously in the background of near views within the designated boundary to the north. The conservation area views affected are among its most significant: from Bedford Square - London's best preserved Georgian square - and the portico of the British Museum, which are both exceptionally precious heritage assets protected by Grade I listing. To the west the Edwardian Grape Street, also within the conservation area, extends the heritage interest of the area. To the east and south however, large-scale modern development terminates the sense of an historic townscape, except in the legible continuation of Museum Street as Drury Lane, leading towards Covent Garden.

North of Selkirk House in the development site, the urban block between West Central Street, New Oxford Street and Museum Street is the product of early-Victorian replanning of the area, when James Pennethorne created New Oxford Street in the 1840s, leaving standing a fragment of the previous late-Georgian terraces - now 10-12 Museum Street. These were listed at Grade II in 2022 for the historic interest of their evolution, the architectural interest of their original form, their 1863-5 refronting in stucco to reflect the changed context, and the degree of survival, though disfigured, of interiors throughout No. 10 in particular. Also recently listed are 35 and 37 New Oxford Street - No. 35 with some surviving historic interior fabric and features - for their historic and architectural interest as part of the response of the then-landowner, the Bedford Estate, to the Pennethorne plan. Outside the development site, but newly



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





listed, is No. 33, The Old Crown public house, which grandly bookends the group. Already listed were the 1860s Nos. 43 and 45 (including 16 West Central Street), the latter with a particularly fine stucco elevation which continues onto West Central Street with arcaded fenestration. All these are also listed at Grade II.

The nine listed buildings (in four designated groups), and all the historic buildings in the block, also have group and historic value for their complementary but varied architectural treatment, even with 20th-century alterations, and the way that together they illustrate the evolving urban morphology of 19th-century London. The composition they form in the streetscape is described in the Conservation Area Appraisal (5.127). Nos. 39-41 were rebuilt in the 1920s with an Art Deco facade and parapet, but remain broadly sympathetic in height, material and proportions.

In particular, the part one-, part two-, part three-storey range at Nos. 16a-16b and 18 West Central Street had a complex evolution as ancillary buildings to the New Oxford Street frontage, and some historic and architectural interest attaches to its character and fabric, especially where this evidences past specialised functions. The elevations display detailing that harmonises with 16 West Central Street and the return to 45 New Oxford Street. Its group value is noted in the Appraisal (5.128) and notwithstanding its modern alteration and poor condition, it contributes positively to the conservation area and to the setting of the listed buildings in the block.

The proposals and their impact

a) Selkirk House and Vine Lane

Selkirk House is proposed to be replaced with a commercial office tower that would stand at 73.9m (19 storeys), stacked upon blocks of incrementally decreasing footprints across up to 11 storeys in height. Situated just outside the conservation area, the considerably enlarged tall building would exacerbate the existing visual discordance and contrast of scale with the historic townscape to the north. The proposed tower would be glimpsed in some more distant views, including from around the River Thames; however its marginal visual impact in any such views and on associated heritage assets would be negligible.

The proposed tower would have a particularly harmful impact, however, in views from certain important places in the Bloomsbury Conservation Area that offer some of the finest experiences of the area's special character. Views south from the portico and steps of the British Museum are closed by the rich facades around Great Russell Street, and the proposed tall building would rise conspicuously above their historic roofscape, visually competing with the delicate silhouette of a late Victorian mansion block and visually dominating the lower and more formal mid-Victorian stucco blocks





laid out by Pennethorne. In the view from the Grade-I listed Bedford Square, the strong horizontal roofline of the Grade-II listed late Georgian buildings of Bloomsbury Street, just south of London's best preserved Georgian Square, would be interrupted by the vertical form of the proposed tall building. These listed Georgian and Victorian Bloomsbury terraces derive significance from their orderly planning and the collective architectural effect of their elegant, regular elevations, and would be harmed by the incongruous intrusion of a larger tower in their settings.

The conservation area would also be harmed by this effect of the tower and by its considerable height and bulk in various views around the central part of New Oxford Street itself and streets off it, where the planned character and traditional style, grain and scale of the 19th-century development and its key buildings currently prevail. The buildings of the West Central Street block within the development site particularly contribute to significance in many of these views, and the settings of those which are listed buildings would correspondingly be harmed by the discordant and imposing effect of the proposed tower in their near backdrop.

The impact of the proposed tower on the conservation area would, in the NPPF's terms, reach the middle of the range of less than substantial harm, with harm of a slightly lower order to the affected listed buildings within it.

Between West Central Street and High Holborn a new public route to be called Vine Lane would be cut, with new buildings of between four and six storeys to be built at the rear of the Doll Buildings that front Grape Street. A new public space would be incorporated towards the southern end. Though there has been no through route for several hundred years, the public realm improvements would benefit the area.

b) West Central Street block

Within the West Central Street block, in all five of the historic terraced buildings recently listed, there is a general undertaking in proposals to retain, reorganise and refurbish the upper parts for residential use, with commercial units on the ground floor as historically. Historic fabric from around the ground-floor commercial spaces, including façade corbel brackets and pilasters, would generally be retained, but the shopfronts would be replaced in traditional style. Well-detailed shopfronts and interiors responding to the character of the building, together expressing of the historic mix of commercial and residential uses, would sustain or enhance the significance of the listed buildings and the urban block to the conservation area.

Within the depth of the block, the historic accumulation of ancillary structures was largely replaced by the 1990s nightclub development. As such, the consolidation of the block to provide a podium structure with a landscaped courtyard for servicing and





circulation is unlikely to cause any additional harm to significance - except in its relationship to the rear of Nos. 10-12 Museum Street, discussed further below.

c) Nos. 10-12 Museum Street and Nos. 35-37 New Oxford Street

The interiors of No. 10 would be retained and restored as a single dwelling, with particular attention to the historic details and finishes that unusually survive there. Nos. 11 and 12 would be reordered internally to provide flats, to be accessed from the proposed podium and bridge deck within the depth of the block at the rear. In all three, existing windows of some age and historic character would be retained and repaired, and the party walls (except for lateral connections between Nos. 11 and 12) and exterior walls (except the rear wall of No.11, parts of which would be demolished and reinstated on the original line) retained.

The proposals would bring the footprint of modern development hard up to the backs of the listed terrace, Nos. 10-12 Museum Street, up to raised podium level. While little of the fabric and only some of the plan in these rear areas is historic, the proposals would remove the remaining integrity of the full plots and legibility of the historic footprints within the block, causing a degree of harm.

The internal repair of No. 10 would be of some heritage benefit, but other works would harm the terrace. At the rear of No. 10, the 19th-century closet wing (later laterally extended) would be demolished, in order to permit direct access to the podium level and garden within the depth of the block via a flight of stairs opening straight off the street. The loss of this original or early part of the No. 10 - the only surviving closet wing among the three houses - would cause some harm to its significance as a substantially intact 19th-century house.

While few or no historic internal finishes appears to survive in Nos. 11 and 12, the historic plan form of the latter does, in the main, despite the structural alteration and internal and lateral opening-up that has taken place. Its staircase has its historic form and location, if not all its fabric. The arrangement of No. 12, being set over the old carriage arch and with the trace of its historic plot to the rear legible in plan, has some particular interest as part of the stub terrace. The loss of its stair and the remaining vertical integrity as a building would harm the terrace's significance, largely erasing any sense of the survival of its historic interior plan and arrangement.

Taking into account the proposed works of reinstatement and restoration as well as the important erosions of significance, the proposals would result in less than substantial harm at the low end of the scale to the listed 10-12 Museum Street.

Nos. 35 and 37 would be reordered internally to provide one flat each, over the





ground-floor commercial units. The existing non-historic staircases, the fine fireplace at second-floor level of No. 35, and the part-historic plan would be retained, but other modern finishes replaced in an appropriate character. The proposals look unlikely to cause harm and may help to recover some significance through character and layout.

d) Nos. 16a, 16b and 18 West Central Street

Nos. 16a, 16b and 18 West Central Street would be demolished for replacement with a part five- part six-storey building to provide residences, including some affordable. The small group is currently the subject of a Certificate of Immunity from Listing; but the buildings nonetheless contribute considerably to group value and have some significance of their own, being a non-designated heritage asset (NDHA). Their demolition would harm the conservation area through loss of their contribution to character and appearance. It would also damage the integrity of 19th-century urban block (otherwise only slightly interrupted by the 1920s facades of 39-41 New Oxford Street) to the detriment of the conservation area. And in both these ways demolition would harmfully deplete the significant settings of the block's listed buildings - most considerably 10-12 Museum Street and 43-45 New Oxford Street, which adjoin the ancillary buildings. As an NDHA, the buildings would suffer total loss of significance.

The height and bulk of the proposed replacement block would add to the harm principally caused by the demolition of the existing 16a-18 West Central Street. It would be most conspicuous around the junction of Coptic Street with New Oxford Street and, on the threshold of the conservation area, in a small range of views Museum Street. In both areas it would form the backdrop to listed buildings in the block, where it would cause harm chiefly by introducing a sense of incoherence with and within the characterful urban block and their immediate historic settings. Though contextual aspects of the proposed façade design provide some degree of mitigation, the replacement building would be conspicuous as a large, modern insertion into the smaller-scale historic block.

Taken together, the proposed works to the West Central Street block would cause mid-level less than substantial harm to the conservation area and to the listed buildings within the block through the impact on their settings.

Relevant planning policy context

a) National policy framework

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed buildings and their settings. Section 72 of the Act





requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development', where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental). The Framework makes clear that sustainable development pursues the three objectives in mutually supportive ways.

Section 12 of the NPPF is about achieving well-designed places. Paragraph 130 states that planning policies and decisions should ensure that developments: are sympathetic to local character and history (c); and establish or maintain a strong sense of place (d).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. Paragraph 195 is clear that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. In practice that means that less harmful alternative solutions should be fully explored before any application for the current scheme is determined.

Paragraph 199 states that when considering the impact of a proposed development on a heritage asset (including through its setting), local planning authorities should give 'great weight' to preserving the asset's significance (and that the more important the asset the greater the weight should be). The decision-maker must give "considerable importance and weight" to any finding of harm, and any harm or loss requires clear and convincing justification (paragraph 200).

Harm may be substantial, or less than substantial. The phrase "less than substantial harm" describes all harm that is not "substantial", which is a wide range of harm from the very minor to the severe. "Less than substantial harm" in NPPF terms does not imply "a less than substantial objection", and does not obviate the considerable importance and weight the harm attracts in decision-making. If the harm caused to a designated heritage asset is deemed to be less than substantial, paragraph 202 of the NPPF requires that harm to be weighed against the public benefits of the proposals. Paragraph 203 states that a balanced judgement on the effect of proposals on non-designated heritage assets is required, having regard to the scale of harm that would be caused to them.

b) The Development Plan: the London Plan (2021) and Camden's Local Plan (2017)



The Planning and Compulsory Purchase Act (2004) states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

The London Plan (2021), in its policy HC1(C) on heritage, underlines the need to avoid harm and identify enhancement opportunities, including through actively managing the cumulative effects of incremental change on heritage assets. Policy D9(C) on tall buildings stresses that in addressing their impacts where proposed, development should avoid harm to heritage assets and their settings, which will otherwise require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

Camden's Local Plan was adopted in 2017, but its adopted site allocations date from 2013. The north part of the application site is Site 18, in which the accompanying guidance states that development should "retain and preserve the architectural and historic character of the listed buildings and other heritage assets on the site", and "preserve and enhance the character and appearance of the Bloomsbury Conservation Area, the setting of listed buildings including the British Museum and sustain and enhance the other buildings which positively contribute to the conservation area." A draft Site Allocations document (2019) which is part of the ongoing Local Plan Review includes the whole application site, which is subject to draft policy HCG3, requiring development to (a) respond to the site's varied context including heritage assets, and (b) "ensure that the height and massing of replacement buildings successfully integrate with the surrounding townscape".

The adopted Local Plan contains policy D2 on heritage. This recapitulates the NPPF's requirement that less than substantial harm to designated heritage assets must be convincingly outweighed by the public benefits of proposals. It further states that the Council will resist proposals that would harm the significance of designated heritage assets, including demolition of an unlisted building that makes a positive contribution to a conservation area, alterations that harm listed buildings, and development that would harm conservation areas or the setting of listed buildings.

Historic England's position on the proposals

Historic England welcomes the proposed works of repair to listed buildings, and recognises the potential to improve upon the current appearance of Selkirk House within this rich historic townscape. We also welcome the proposed public realm improvements to this neglected edge of the conservation area.

However, the proposals would cause considerable harm to multiple designated heritage assets, particularly through the widespread impacts of the proposed



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





replacement tall building. The recent designation of several new listed buildings within and adjacent to the site considerably changes the planning balance to be made with the less than substantial heritage harm the proposals would cause.

The conservation area would be harmed in views from multiple locations, by the very large replacement tall building right on its southern edge, as well as by the demolition and replacement at larger scale of buildings that contribute positively to its character and appearance within it, integral to the group value of the West Central Street block. In our view, Bloomsbury Conservation Area is one of the most important conservation areas in London and should therefore be afforded particularly great weight. Some of the areas within it that would be most affected, such as Bedford Square and the British Museum, are of special importance to its character and appearance.

These impacts would also harm listed buildings by considerably exacerbating the incongruous intrusion of the existing tall building within their visual background and historic townscape settings. This harm would affect the several listed buildings now within the site, as well as others in the surroundings, such as at Bedford Square and on Bloomsbury Street.

In addition to the extensive setting impacts of the proposed tall building, the demolition of 16a, 16b and 18 West Central Street for replacement with the considerably larger new building proposed, with consequent loss of significance through group value and the sense of incoherence introduced by the replacement, would also harmfully deplete the complementary historic settings of the listed buildings in the historic urban block and the character and appearance of the conservation area. The direct works proposed to the listed buildings would set considerable measures of conservation against detrimental alterations, which include marked harm to significant elements of the listed terrace, 10-12 Museum Street, that attracts considerable weight.

In summary, the proposals would cause multiple instances of harm to designated heritage assets: in multiple impacts upon the character and appearance of the Bloomsbury Conservation Area, both within and from outside its boundary; to a recently increased number of listed buildings through their settings and the diminishment of their group value; and by a small number of direct alterations that would damage elements of their significance. The proposed works of benefit to the listed buildings within the site is welcome but is set against this wider array of harm, affecting both these and the other designated heritage assets, including the large part caused by the proposed tall building.

We recognise the potential for the application to provide public benefits important to your Authority, but the desirability of preserving designated heritage assets is a statutory duty and an objective of the Development Plan. The harm that would arise





from the proposals suggests design that is not sufficiently sympathetic to the historic context. Exploration of alternative ways of achieving the proposals' benefits should be thorough in order to be confident that harm is avoided and minimised.

For the purposes of the NPPF we judge that the the proposals would cause harm to a large number of designated heritage assets - multiple measures of harm that would range from the low through the middle part of the scale of less than substantial harm. Great weight should be given to the conservation of these assets, irrespective of the level of harm caused. Major impacts such as those described here can progressively and fundamentally erode the character of conservation areas and the significance of nearby listed buildings, and it is important to recognise therefore that the harm identified above is a very serious issue. Such harm should not be accepted unless your authority is persuaded that the harm has been minimised and has clear and convincing justification, including that it would be outweighed by the public benefits the proposals would secure.

Recommendation

Historic England objects to the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 195 and 199 to 203 of the NPPF.

In determining this application you should bear in mind the statutory duties contained in: section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; section 72(1) of the Act to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas; and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Alfie Stroud

Inspector of Historic Buildings and Areas

E-mail: alfie.stroud@historicengland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.