



**Application: Redevelopment of Selkirk House, 166 High Holborn and 1 Museum Street following the substantial demolition of the existing NCP car park and former Travelodge Hotel to provide a mixed-use scheme, providing office, residential, and town centre uses at ground floor level. Works of part-demolition and refurbishment to 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street to provide further town centre ground floor uses and residential floorspace, including affordable housing provision. Provision of new public realm including a new pedestrian route through the site to link West Central Street with High Holborn. Relocation of cycle hire docking stations on High Holborn.**

**LPA ID: 2023/2510/P & 2023/2653/L**

**Address: 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**

Dear Mr Fowler,

Thank you for consulting the Georgian Group on the applications for Planning Permission and Listed Building Consent regarding the above address. Based on the information available to date, the Group objects to both applications for the reasons set out below and recommends your Local Authority refuse consent.

### **Significance of Surrounding Heritage Assets**

The southern section of the application site, where Selkirk House is located, sits just outside the boundary of the Bloomsbury Conservation Area. Within close proximity to the application site are several nationally important buildings which will be harmed by the proposed development. This letter will highlight the significance of only those buildings that fall within The Georgian Group's remit (1700-1840), this does not mean that any building I do not describe will not be harmed by the proposed development. The Group defers to other amenity societies on buildings falling under their expertise.

Bedford Square, which sits to the northwest of the site, was built between 1776 and 1780 by W Scott and R Grews to the designs of either Thomas Leverton or Robert Palmer. The central garden is designated at grade II\* and surrounded by four grade I listed terraces giving the square an architectural uniformity which set the style for garden squares in London through the late 18th century and early 19th century. The Bloomsbury Conservation Area Appraisal states that 'Bedford Square is one of the

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most significant and complete examples of a Georgian Square in London'. Whilst John Summerson refers to Bedford Square as 'one of the most valuable relics of Georgian London'. At present, when situated within the square you are afforded near uninterrupted views of the surrounding terraces, this is something that enhances the setting and significance of the listed garden and surrounding terraces on the square. The setting of Bedford Square makes a considerable contribution to the significance of the individual terraces and the ability to view the terraces amongst a near clear skyline preserves the 18<sup>th</sup> century character of the square.

Connected to Bedford Square by Montague Place is the grade II Park and Garden, Russell Square, which is surrounded by some original houses, which are present to the west side of the square. The square is also home to the Russell Hotel by Charles Fitzroy Doll, the former surveyor of the Bedford Estate. The garden itself was laid out by Humphrey Repton and is larger than any earlier London Square. Despite the alterations to the surrounding terraces, Russell Square possesses importance due to its relationship with the surviving garden squares within Bloomsbury; it is attached to Bedford Square by Montague Place and to the south, Bloomsbury Square by Bedford Place. The square and surrounding area have high historical interest due to the association with the great builder, James Burton. Summerson attributes the Russell Square area to James Gubbins, the Duke of Bedford's Surveyor, but the facades of the houses to Burton who also undertook work to Tavistock Square.

Bloomsbury Square has had the surrounding terraces altered or demolished. The garden was laid out by Humphrey Repton circa 1806 and is grade II listed. These three squares still exhibit a plan of eighteenth and nineteenth century Bloomsbury and their setting should be protected along with the character of the wider Bloomsbury Conservation Area. The association of the Bloomsbury area with two of the great builders of the era, James Burton and Thomas Cubitt is of particular interest.

The British Museum which is located directly to the north of the application site is a Grecian building of exceptional architectural interest. The museum was designed by Sir Robert Smirke, who was then architect to the Office of Works and was tasked with designing a space for large sculptures but also collections of smaller artefacts. Smirke finalised the scheme in 1823, with the building of the museum being undertaken in various phases and altered in the following decades and centuries. The use of iron cramps to fix the large Portland Stone to a brick core was an innovative construction technique and contributes to the significance of the building. The entrance front to the building is particularly impressive with Greek Ionic columns forming a portico and colonnade which can be appreciated from the forecourt. The setting of the British Museum is enhanced by the visitors' experience within the forecourt, portico and the colonnade which contributes to the architectural interest of this grade I building.

St George's Church, Bloomsbury by Nicholas Hawksmoor was built under the Fifty New Churches Act 1711 and is located to the north of the site. Other notable names who built churches under the act were James Gibbs, John James, Thomas Archer and Henry Flitcroft. Hawksmoor was a senior when he undertook the designs for the church, with some thirty years of experience behind him. Construction of St George's began in 1716, the same time as St Mary Woolnoth also by Hawksmoor. St George's is unique in showing the first example of a six-column Corinthian portico in a London

Church with Pevsner suggesting that it may perhaps be the most grandiose of the 18th century London churches.

Located within the application site and the Bloomsbury Conservation Area are numbers 10-12 Museum Street. These buildings have recently been afforded grade II listing and possess elements of historic and architectural interest, along with group value associated with the 19<sup>th</sup> century urban block on the application site. No. 10 Museum Street is the most well-preserved building with surviving historic fittings and joinery, along with an impressive staircase. The buildings were re-fronted later in the 19<sup>th</sup> century in association with the New Oxford Street development and the buildings within this block contribute to the setting of numbers 10-12 Museum Street and the group value present.

The Bloomsbury Conservation Area is of international importance due its association with some of the most important national buildings and for the legibility of the 18<sup>th</sup> and 19<sup>th</sup> planned street layouts with terraced squares. The special interest of the conservation area as stated within the conservation appraisal, is due to the ‘experience of moving between streets, squares and other spaces, and the contrast created between enclosure and open spaces’. This experience is enhanced in its current setting of the conservation area which permits historic views towards important landmarks within the conservation area and allows the visual characteristics of the area to be preserved. There are 14 sub-areas within the conservation area which each contribute different characteristics towards the special interest of the whole, however there is an overriding character and appearance relating to the 18<sup>th</sup> and 19<sup>th</sup> century town planning which contributes to the architectural and historic interest of the conservation area.

## **Proposal**

The proposed development consists of new buildings on the site which range from 6 storeys to 19 storeys. Selkirk House is set to be demolished along with the undesignated heritage assets within the 19<sup>th</sup> century urban block which form part of the Bloomsbury Conservation Area.

## **The Georgian Group’s Advice**

The height and scale of the proposed development would cause significant harm to the significance of several individual heritage assets and the wider Bloomsbury Conservation Area. The significance of those assets has been alluded to in this letter, as has the contribution they collectively make to the wider nationally significant Bloomsbury Conservation Area.

Views 13 and 14 within the submitted TVHIA shows views from the northern and southern points of Bedford Square. The uniformity of the eastern terrace of Bedford Square is clear in views 13 and 14 with the rows of chimneys forming a pleasing visual characteristic. The near clear skyline setting behind the eastern terrace contributes to the significance of grade I buildings along the eastern side and allows receptors to appreciate the character and appearance of this important section of the Bloomsbury Conservation Area. The 19-storey element of the proposed scheme would protrude above the eastern terrace and form a visual distraction from the

terrace and square by breaking the continuous roofscape. This would cause significant harm to the significance of the grade I buildings within this terrace and the character and appearance of the Bloomsbury Conservation Area. Camden Council has recently approved consent for a six-storey building in the setting of the western terrace of the square, the cumulative impact of these tall buildings in the setting of the square should be considered by your local authority.

The British Museum is one of the great national buildings and its setting is wide reaching and enhances the significance of the building considerably. The forecourt forms part of the setting and provides a space to experience and appreciate the primary elevation of the building with the impressive Ionic columns and the pediment sculpture. The setting of the British Museum extends to the views out of the colonnade which wraps around the front of the building. This view at present allows the visitors attention to be on the building itself which is permitted due to the consistent roofscape to the front of the forecourt. The introduction of the 19-storey building creates a visual distraction from this experience and takes the attention away from the building. This would harm the setting of this grade I building and thus cause harm to its significance.

10-12 Museum Street have recently been afforded grade II listing and form a group with the adjacent buildings of a later date. This 19<sup>th</sup> urban block contributes to the character and appearance of the Bloomsbury Conservation Area and is of interest due to the association with James Pennethorne's New Oxford Street development.

The demolition of a section of this 19<sup>th</sup> century block and erection of a six-storey building would firstly harm the setting of no.10-12 Museum Street due to the overbearing scale of the proposal. Whilst there would be harm to the character and appearance of the conservation area due to the inappropriate height in relation to neighbouring properties which at present form a coherent block. The internal works to nos.11 & 12 Museum Street are inappropriate and would harm the significance of this set of heritage assets by eroding the historic planform and legibility of the historic circulation route. Development proposed to the rear of this set of assets would further erode the architectural and historic interest associated with the buildings.

The individual buildings mentioned above are all located within the Bloomsbury Conservation Area and contribute to its overall significance. The proposed 19-storey building would be visible from numerous important points and specific sub areas within the conservation area. Expanding on the heritage assets mentioned above, the tower would be visible from Lincoln Inns Fields, Bloomsbury Square gardens, St George's Church, and several viewpoints within the street patterns surrounding the British Museum. More specifically, sub areas 3,5,6,7 and 8 would all be impacted.

The existing street patterns and built form which is reflective of its 18<sup>th</sup> and 19<sup>th</sup> century town planning contributes the significance of the Bloomsbury Conservation Area. The character and appearance of the conservation area is enhanced by the experience of being located within the various squares and being able to view them in their near original setting, whilst the experience of moving between certain squares on original street layouts. The introduction of the 19-storey tower within the setting of the conservation area would cause serious harm to its significance. The introduction

of the 6-storey building within the 19<sup>th</sup> century urban block would harm the character and appearance of the Bloomsbury Conservation Area.

### **Recommendation**

The application in its current form would considerably harm the setting and thus the significance of the Bedford square eastern terrace and park and garden, this is at the middle to higher end of the less than substantial spectrum.

Additionally, due to the impact on the setting of the British Museum and numbers 10-12 Museum Street, there would be less than substantial harm to these individual heritage assets. The Bloomsbury Conservation Area contains several nationally important buildings and notable squares which would be impacted by the 19-storey tower. The visual intrusion the tower would cause in movement throughout the area would cause serious harm to the Bloomsbury Conservation Area and is bordering on substantial harm. The special interest of the Bloomsbury Conservation Area is closely aligned with the ability and experience of moving through the historic street plan of the area which is near preserved from its 18<sup>th</sup> and 19<sup>th</sup> century origins. The introduction of the 19-storey tower in the setting of the conservation area would be visible in numerous viewpoints within Bloomsbury and would detract from the setting of some of the most nationally important buildings whilst altering the character of the conservation area considerably.

Paragraph 199 of the NPPF reinforces the need to give great weight to the conservation of heritage assets, and the more important an asset, the greater the weight should be. The three heritage assets referred to above are all grade I and should be afforded the highest level of weight.

Paragraph 200 sets out that ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’.

Paragraph 201 states ‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply’ and then goes to list the four criteria necessary which needs to be met.

Relevant to the above paragraph, the 2013 case of Bedford BC v SSCLG38 set the high bar for substantial harm to be met. It was said that ‘*the impact on significance was required to be serious such that very much, if not all, of the significance was drained away... One was looking for impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*’.

Paragraph 018 of the PPG states in relation to substantial harm that ‘Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in

many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'

Paragraph 202 of the NPPF states 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

The Group recommends your local authority refuse consent for Planning Permission and Listed Building Consent.

As the decision maker, your local authority should take these comments on board when undertaking the balancing act set out within paragraph 202 of the NPPF. Additionally, the Group would like to remind your local authority of its obligations in line with section 66 (1) and 72 (1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting; and in reference to conservation areas (section 72), that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

The Group would like to draw your attention to the recent decision by the Secretary of State for Levelling Up, Housing and Communities to quash permission to demolish and redevelop the Marks and Spencer's store on Oxford Street. This decision has set a precedent in relation to our built environment and embodied carbon. The current

application would involve considerable demolition when retrofit would prove a more climate friendly alternative and has been explored by Targeting Zero LLP in their report dated 15<sup>th</sup> March 2023.

Your authority should take these representations into account when determining this application.

Yours sincerely,  
Edward Waller (Conservation Advisor for South East England and London)