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Your reference: 185281 Our reference: 2023/2510/P

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Dear Mr Fowler,

RE: 2023/2510/P & 2023/2653/L 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. 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

Thank you for consulting the Victorian Society on this application, having reviewed the proposals we make this **objection**.

Selkirk House is situated immediately to the south of the Bloomsbury Conservation Area, Sub Area 8. This Conservation Area is one of the most significant in the country as an example of 18<sup>th</sup> century urban planning and contains a high number of listed buildings dating from the 18<sup>th</sup> century onwards, including the Grade I British Museum. Due to its scale and design Selkirk House does not make a positive contribution to the setting of the Conservation Area and this is noted in the Conservation Area Appraisal. The site also encompasses several Grade II listed buildings on Museum Street and New Oxford Street which form part of *Sir James Pennethorne's* important development of New Oxford Street, a highly significant example of early 19<sup>th</sup> century urban planning. Undesignated historic buildings within this urban block are considered positive contributors to the Conservation Area and have some significance. Near the site are several listed buildings dating the from the 19th and early 20<sup>th</sup> century such as the Bloomsbury Public House, King Edward and Queen Alexandra Mansions, and the Shaftesbury Theatre (all listed at Grade II).

The proposal envisages the demolition of Selkirk House and unlisted buildings on West Central Street, and their replacement with new development between 6 and 19 storeys,

works would be undertaken on the listed buildings on the site, a new thoroughfare would be created between West Central Street and High Holborn, with new development on the western part of the site.

### **Selkirk House**

The proposed 19 storey building would be 27 metres taller than the existing Selkirk House; the height of the existing building is already noted as having a negative effect on the Bloomsbury Conservation Area and nearby historic buildings. This harm to setting of the Conservation Area and nearby listed buildings would be increased by the significant difference in height of the proposed building. Selkirk House is already an overbearing neighbour to listed buildings such as King Edward and Queen Alexandra Mansions and the Shaftesbury Theatre. However, the Townscape and Visual Assessment show that this would be increased, especially in the case of the Shaftesbury Theatre where the height of the proposed building would vie with the prominence of the Theatre's distinctive corner turret which faces Princes Circus. The scale of the proposed building would impose on the setting of the British Museum, and impact particularly important views outwards from the south portico. Also, the proposed building would introduce a harmful precedent for further tall buildings close to the Bloomsbury Conservation Area. The design quality of the proposed building is not sufficient mitigation for the considerable level of harm it would cause to heritage assets.

Ultimately, a building lower than the existing Selkirk House would be the optimum proposal, but failing that, the existing height of Selkirk House is the absolute maximum acceptable in this location to prevent further harm. Considering the environmental impact of demolishing Selkirk House and constructing a new, larger building we advocate a retrofitting approach that would retain the existing structure.

### Museum Street, New Oxford Street, West Central Street

The proposals also envisage the development of existing buildings to the north of Selkirk House, within the Bloomsbury Conservation Area. Of these buildings 10-12 Museum Street and 35-37 New Oxford Street are Grade II listed, and the buildings on West Central Street are positive contributors to the Conservation Area. The alterations to 11 and 12 Museum Street would harm significance by the erosion of the historic planform and legibility of the buildings. The demolition of other buildings on West Central Street and their replacement with a 5-storey new building would harm the significance of the Conservation Area by the loss of buildings that are positive contributors and contribute to the historic legibility of the urban block. These have a strong connection with the neighbouring listed buildings and their setting would be harmed both by the loss of the buildings on West Central Street and new development at an inappropriate scale that would overbear the listed buildings. The design of the new building and reuse of historic features would in no way mitigate the harm to significance.

Any development of this part of the site should seek to reuse the existing buildings, both to preserve and enhance significance, but also as an environmentally sensitive mode of development.

Finally, whilst at first the creation of Vine Street appears positive, any benefit from this would be negated by proposals for the new residential building flanking the Cuban Embassy. As with the West Central Street infill building, the scale of this is inappropriate for the location, and the design would compete, rather than complement, the Embassy itself. The development of this area of the site is not objectionable in principle, but it seems that a more sympathetic design is needed.

#### Policy

Paragraph 200 of the NPPF states that;

Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.

# The London Plan policy HC1C;

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

## The Camden Local Plan policy D2:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area;

These proposals contravene these local and national planning policies and therefore we **object** to this application and urge your Authority to refuse consent.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill

**Conservation Adviser**