



**CONSULTEE RESPONSE: OBJECT**

Mr David Fowler  
Camden Council Planning Department  
Argyle Street  
London  
WC1H 8EQ

By email to: David Fowler & Planning

Our reference: 23039

10<sup>th</sup> August 2023

Dear Mr. Fowler,

**Planning Application 2023/2510/P and Listed Building Consent application 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 reconsulting SAVE Britain's Heritage on these new applications which replace previous applications for earlier iterations of this scheme [Ref: 2021/2954/P], to which SAVE submitted objections in September 2022 and February 2023. We wish to reiterate our ongoing strong **objection** to the scheme on heritage and sustainability grounds, and for the reasons set out below, we call on the Local Planning Authority to **refuse** planning and listed building consent.

**Summary**

Some localised changes have been made to this latest iteration of the scheme in response to Historic England's listing of 10-12 Museum Street, 35-37 New Oxford Street and The Old Crown Public House which are welcomed. However, SAVE remains strongly opposed to the overall impact of the amended proposal which would result in very substantial harm to the setting of those newly listed buildings, as well as the Bloomsbury Conservation Area ("the BCA") and the multiple designated and non-designated heritage assets (NDHAs) within it. The BCA is considered one of the most important conservation areas in the country and protecting it and its setting must be paramount in considering this application.

Moreover, in the light of the recent decision for the M&S flagship building on Oxford Street (PINS Ref: APP/X5990/V/3301508), SAVE considers the proposals would carry a substantially harmful and disproportionate carbon cost. The applicant has demonstrably failed to explore alternatives to demolition in a meaningful way or demonstrate that a refurbishment would not be deliverable or viable. We therefore consider this application also fails on sustainability and Net Zero grounds.

## **Significance**

As we set out in our previous objection letters, the application site lies within the setting of multiple designated and non-designated heritage assets, including the grade I listed British Museum and St George's Church. Both these buildings of the highest national significance and are among the finest examples of their building type in the country and their settings are therefore extremely sensitive. With the recent grade II listing of 10-12 Museum Street, 35-37 New Oxford Street and The Old Crown Public House by Historic England, the importance of protecting the significance of the application site and its surroundings has increased.

Part of the application site is within the BCA, but the whole development would have a significant impact on the BCA, an area which is widely considered to be an internationally significant example of town planning. There are multiple NDHAs within the application site which are identified as positive contributors to the conservation area and therefore worthy of appropriate protection.

## **Assessment of the amended proposals**

### **Alterations to 10-12 Museum Street and 35-41 New Oxford Street**

SAVE notes that some changes have been made to the proposals in response to the grade II listing of 10-12 Museum Street and 35-37 New Oxford Street and welcomes the more sensitive approach taken to the external appearance of the newly listed buildings. However, SAVE objects to the demolition of the stable block, a building which the BCA Appraisal identifies as a NDHA giving character to and enhancing the conservation area.

### **Impact of new building**

The new scheme leaves the height of the replacement building unchanged from the previous scheme and SAVE remains of the view that the overall proposals would have an unacceptable impact on the application site, its immediate and wider surroundings.

The extreme contrast between the low scale of the adjacent listed buildings and the replacement building is exacerbated by its vertiginous scale and uniform design, which would overwhelm the setting of these listed buildings. The replacement building remains 20.41m taller than the existing Selkirk House and would be immediately visible and highly prominent when viewed from within the BCA, damaging its setting and curtailing wider views to and from London's historic West End which are protected in the Camden Local Plan (2017).

Whilst Selkirk House falls just outside the BCA, its existing size forms an unsympathetic backdrop to the BCA. Instead of addressing this issue, the increased height of the proposed building only compounds the harm caused by the existing Selkirk House and is fundamentally at odds with the long-established, special character of the BCA, with its low-rise Georgian terraces, garden squares and historic institutions. The proposal therefore continues to contravene Local Plan policies, National planning policies as set out in the NPPF and the LPA's statutory requirements under s.66 of the Planning (LBCA) Act (1990) to preserve or enhance the historic architectural character or appearance of the BCA.

### **Overall heritage harm**

With regard to overall heritage harm, SAVE remains strongly opposed to the amended proposal which would result in very substantial harm to the setting of those newly listed buildings, as well as the Bloomsbury Conservation Area ("the BCA") and the multiple designated and non-designated heritage assets (NDHAs) within it.

This application also fails the test of NPPF 189. Considering the substantial harm identified to the setting of nearby designated and undesignated heritage assets, and conservation area, the proposal would overall fail to conserve the heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. In accordance with para 36 of the Secretary of State's decision on M&S Oxford Street, we consider this harm attracts considerable importance and weight in the planning balance.

However, even if the LPA is minded to determine a lesser degree of harm, we consider the treatment of heritage harm in the M&S decision also applies. In that case, the Secretary of State found that whilst the overall harm to the settings of designated and non-designated heritage assets would fall into the 'less than substantial' category, "Overall he has found that the harm [...] carries very great weight." On this basis he concludes that "the public benefits of the proposal do not outweigh the harm to the significance of the designated heritage assets." If 'less

than substantial' harm is identified by the LPA, we consider the M&S judgment would apply to this case: the individual and cumulative harms proposed to the historic environment of Bloomsbury are not outweighed by public benefits which could not otherwise be achieved in a less harmful way.

### **Unsustainable development**

In their recent decision to refuse the demolition of M&S Oxford Street, the Secretary of State found that national Net Zero legislation for carbon reduction (including embodied carbon) and the requirements of NPPF 152 (2021) weighed against the proposal. The decision states that "*in respect of paragraph 152 of the Framework, the Secretary of State agrees that a substantial amount of carbon would go into construction, and that this would impede the UK's transition to a zero-carbon economy*", and that it "*would overall fail to encourage the reuse of existing resources, including the conversion of existing buildings.*"

In this context, the Secretary of State was highly critical of the applicant's failure to properly consider alternatives to demolition, stating: "*that there has not been an appropriately thorough exploration of alternatives to demolition.*"

Selkirk House is a substantial carbon asset in this context and given the extreme embodied carbon cost of demolition as proposed and the similarly insubstantial consideration of alternatives to such harm through retention and retrofit as in the M&S case, these proposals stand in clear breach of both NPPF 152 and national Net Zero legislation.

### **Alternative Proposals**

SAVE endorses the alternative vision prepared by the Save Museum Street Coalition and published on 7<sup>th</sup> August 2023. This vision clearly demonstrates that there **are** feasible alternative proposals for the retention and reimagining of Selkirk House, reducing its height and in turn its impact on the BCA. Re-using the existing buildings would not only preserve and enhance the significance of listed and unlisted buildings in line with heritage policies but would also drastically reduce the carbon cost of redevelopment in line with the urgent national sustainable development policies set out above.

### **Conclusion**

For the reasons outlined above, and in our previous letters of objection, SAVE remains strongly opposed to these applications and calls on the Local Planning Authority to **refuse** planning and listed building consent.

I would be grateful if you would keep SAVE informed of further decisions or consultation regarding these applications.

Yours sincerely,

**Benedict Oakley**

Conservation Officer, SAVE Britain's Heritage