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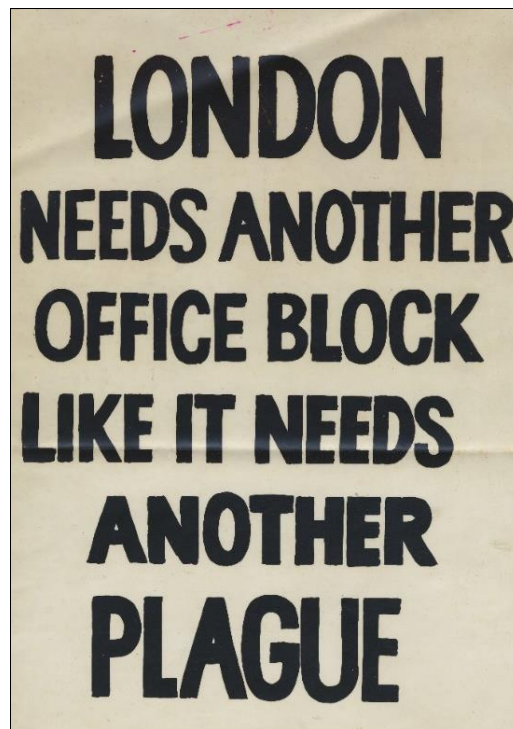
via: Planning@Camden.gov.uk & David.Fowler@Camden.gov.uk

10th August 2023

Dear David,

Re planning application ref. 2023/2510/P, and listed building consent application ref. 2023/2653/L for the redevelopment of the site bounded by New Oxford Street, Museum Street and High Holborn including the demolition of Selkirk House

As the amenity society for the area, Covent Garden community Association (CGCA) must object strongly to these revised applications. They remind us of a simple poster that was put up across Covent Garden in the 1970's, but is even more eerily relevant today:



Our objection is not to the idea of redeveloping this block of buildings per se. Indeed, we have supported many elements of previous schemes put forward by previous owners here. The block bounded by New Oxford Street, West Central Street and Museum Street has been allowed to deteriorate and clearly needs refurbishment. To the South, Selkirk House itself, which was built as the headquarters for Trusthouse Forte in 1968, was always an incongruous size and design in the context of what would become two of the UK's prime conservation areas - but with a new finish, re-worked interior and cleared public realm it could contribute successfully to the area as a residential building, office or hotel (or a mix of such uses).

No, it is this specific scheme which we believe to be wholly unsuitable for the site and its context, as well as being contrary to planning policy in many aspects. We urge the council to reject it and to ask the developers to re-think a more sympathetic solution for this important location.

Indeed, the developers briefly allude to one example of such a scheme as ‘Option 1’ in their ‘Retention & Redevelopment Options Review’ document. Their only objection seems to be that the office floors “can only be safely occupied at less than half the density of a standard office due to limitations on the fire escapes. This constraint severely limits the usefulness of the space and demand from occupiers, making it economically unsustainable”. This cannot be taken seriously, as fire escapes can be added to the exterior of Selkirk House.

Many of our grounds for objection are included in the extensive comments made by the ‘Save Museum Street’ grouping of respected societies, associations and landowners.

We summarise our grounds for objection further below.

We must also ask: could we imagine such a scheme being built in Paris, a block away from the Louvre? Of course not.

And no more should it be built here in London, a stone’s throw from the British Museum, one of the UK’s major tourist attractions and a monument to the history of culture and place. What will it say to visitors from all over the World about our respect for our own historical neighbourhoods?

Appearance detrimental to the area and wider context

- The main tower is too tall, at 75 metres it would be 65% the height of Centrepoint and 40% higher than Selkirk House is currently. It would be visible from all over London, from Bloomsbury’s historic squares down through Covent Garden. The applicant’s Townscape, Visual Impact & Heritage report shows this clearly. And the building will dominate many other views that this report does not show, from higher floors of even more buildings throughout the West End.

The 53 metre height of Selkirk House is already out of keeping with its surroundings when viewed from Covent Garden (eg: from Shaftesbury Avenue, Seven Dials, Drury Lane) and Bloomsbury. But at least it cannot be seen from so far afield. New development on this site should not be permitted any higher than Selkirk House currently stands.

The applicant states in the D&A statement that “height is required in order to offset the impact of the constrained footprint”. There is no attempt to justify the height on any other basis. This argument, which is essentially one of profitability for the developer, cannot justify the harm.

- The massing of the main new building is also too bulky, dominating local views and overshadowing its neighbours. It is out of scale in the context of pre-Georgian Seven Dials to the South and Georgian Bloomsbury to the North. It is also out of scale with the historic buildings that are part of this application on New Oxford Street and Museum Street.

The nearby Post Building has proven to be dominant in terms of bulk; it is described on its own website as “a post-industrial building of epic scale and volume”. But the planning system had little choice in allowing it, because it replaced an already massive Post Office sorting office. The Selkirk House proposals are a whole order of magnitude greater than this “epic scale” but in this case there is no issue

of having to replace an already massive building. New development on this site should not be permitted any larger in bulk than Selkirk House currently occupies.

- The destruction of historic buildings on Museum Street ruins the streetscape, part of which is in the Bloomsbury Conservation Area and all of which is in clear view of it. The new infill building on Museum Street is out of scale and unsympathetic in colour and design. It harms the context of the neighbouring listed buildings, in particular that of 33 New Oxford Street on the corner, and 10-12 Museum Street, but also views of 35-37 New Oxford Street.
- The new buildings in the scheme are anodyne and much bulkier than their older neighbours. This site is in the centre of London's historic district, yet these buildings are of a sort that can be seen anywhere. They represent a missed opportunity for what could be amazing design in an amazing place.
- The site lies within the 'Tottenham Court Road' area under Camden's Local Plan, Growth & Spatial Strategy. This states that development should be "of the highest quality, as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas". These proposals do the opposite.

In terms of design, the scheme should be refused as contrary to Camden's Local Plan policies D1(a, b, f & m), D2 and D3.

Inadequate housing

- The site has always contained a significant number of dwellings, most of whose occupiers were 'decanted' some years ago, reducing the supply of homes here. Residents in the 11 flats at 35-37a New Oxford Street told us that this move was against their will, but the council was unable to prevent the loss of their homes to facilitate future development. 11 more of the existing dwellings are 2-floor maisonettes in Selkirk House, with their front door at the side of the tower (at 11 West Central Street), but they were illegally used for short letting in recent years which was easy to free-up at short notice.
- The applicant's provision of housing fails to even to reach the policy requirement, let alone to be generous. There is a shortfall of more than 1,300 square metres which the applicant states "will be off-set by a payment in lieu, subject to viability". The applicant does not attempt to give housing a high priority.

We would expect a developer to assign lower priority to housing provision than to profit, but the LPA must prioritise it. We are very concerned that the housing is proposed as the last stage in the development. The council has been here before (for example, at Swiss Cottage). When the viability of any large development reduces in its later stages, housing obligations are sacrificed. **Please ensure that the elements of any scheme that contain housing are built before the main commercial elements.**

- Given the serious issues with short letting in the West End, we also ask that **any new housing at this or any other site is prevented, by planning condition, from being used for anything but primary homes.**
- The quality of the affordable and social housing units in the proposed scheme seems mean. These properties are for long-term primary homes, yet they have far less privacy, light and outside view than the properties designated for the open market.

We understand that it is reasonable for space to be larger and finish to be of higher quality in luxury apartments, but we ask that any new affordable and social housing at this or any other site is mixed in with other housing in a way that does not discriminate in terms of build quality or light.

In terms of housing provision, the scheme should be refused as contrary to Camden's Local Plan policy D1(n), H1/3/4 and Camden's Housing Design Supplement, as well as GLA standards.

Lack of public and recreational space, and damage to neighbouring public open space

- The immediate impression of the plans is that public open space has been reduced to a minimum.

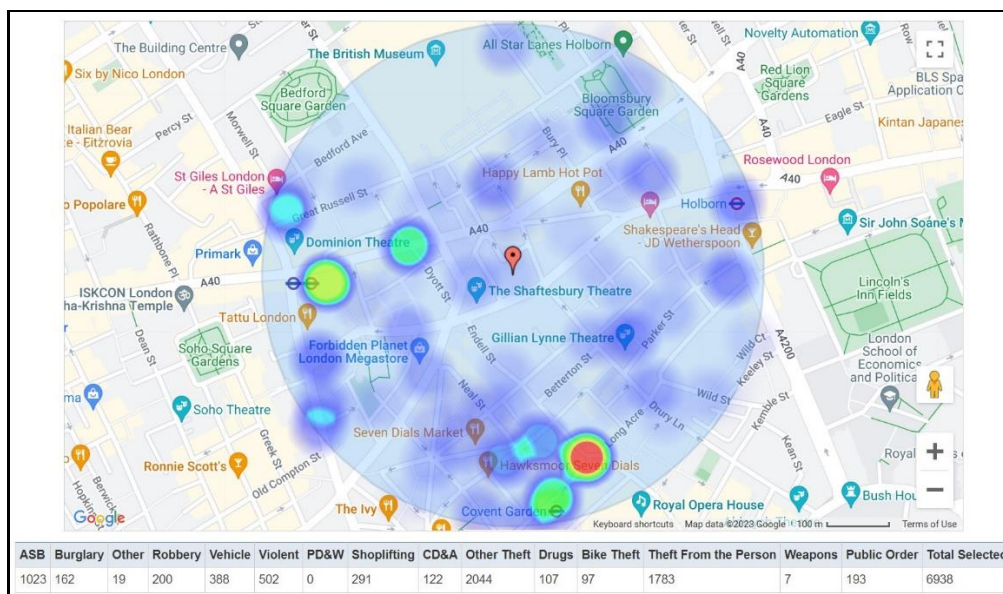
We ask that any scheme on this site increases the amount of public open space at ground level at least by the same percentage as the increase in internal square footage.

- In terms of quality, despite imagery in the various reports, there is nowhere substantive for families to play nor for social / inter-generational interaction. There is a small courtyard set above ground level which will generally be in shadow and is flanked by equipment. There is no true garden for residents nor a community room.
- In terms of quantity, the proposed open space does not comply with the standard of 9 sqm per residential occupant cited in Camden's Local Plan policy A2.
- The bulky building at 1 Museum Street would overshadow the public garden space provided as part of the S106 agreement for the Post Building, removing half its view and much of its light. This would cause great harm to it as a much-needed community amenity. Camden's Local Plan, Growth & Spatial Strategy states that, in this area, development should be "remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces". These proposals do the opposite.

In terms of open space provision, the scheme should be refused as contrary to Camden's Local Plan policies A2, C1 and D1(k & l).

No improvement to Safety & Security

- The scheme involves cutting through the site from North to South, to join the elbow of West Central Street to High Holborn by creating a walkway called Vine Lane. Sadly, this area is subject to very high levels of street crime, as the hotspot map for the year 2022-23 to date shows:



The narrow, high walled design of the alley, which will get very little natural light, is unlikely to improve matters and may make them worse.

- Much of the new built is characterised by recesses at ground floor level. There is no evidence that designing-out crime and antisocial behaviour has been considered.
- Camden's Local Plan, Growth & Spatial Strategy states that, in this area, development should be "improving community safety, including opportunities for crime and anti social behaviour". These proposals do the opposite.

In terms of safety & security, the scheme should be refused as contrary to Camden's Local Plan policy C5 and D1(i).

Environmental abuse

- The proposals involve demolition of a viable 15 storey building that has been in continuous use for more than 50 years, as well as demolition of other elements of the site. The removed fabric will largely be disposed of in landfill. Viable schemes could be proposed that involve very little demolition.

We ask that any scheme on this site follows principles of refurbishment instead.

- The proposals involve the erection of a much bulkier, 19 storey building faced in glass and other materials that require massive energy consumption and carbon emissions in manufacture.

These issues are explored in great detail in the report commissioned from Targeting Zero by the Save Museum Street coalition, of which CGCA is a founding member. We ask that any scheme on this site involves as little new build as can viably be accommodated.

In terms of climate change mitigation, the scheme should be refused as contrary to Camden's Local Plan policy CC1.

Unacceptable loss of amenity during the Demolition, Excavation & Build phase

- The proposals involve demolition, excavation and building work across a large site. Works are projected to last at least 4 years. This would be going on throughout the entirety of some local children's GCSE and A-Level years.

The effects of such works include damage to air quality from site traffic and congestion, serious nuisance from noise and vibration, dust in people's homes, and loss of sleep due to work at antisocial hours. This is detrimental people's mental health in streets near large developments. It is totally unacceptable to local people for such a prolonged time, especially on the back of nearby Crossrail works and development at St. Giles Circus; these are finally about to come to an end and, everyone had hoped, allow local people back some peace. All CMPs claim to mitigate these effects, but in reality they cannot be prevented and the council readily admits that it does not have the resources to enforce breaches.

We ask that any scheme on this site involves smaller interventions that can be accommodated by construction periods of months rather than years.

Servicing needs that will be difficult for the area to support

- We have serious concerns over the capacity of the local area to absorb the delivery, servicing and waste collection needs of such a substantial mixed-use development in this tight area of London's West End. In a separate document we have detailed our concerns with the applicant's estimates. We ask you to require the applicant to revise their approach, but in any case we believe that the site's needs are likely to cause disruption.

- Deliveries & servicing are now the leading cause of complaints from residents in our area. DSPs are painstakingly negotiated, then their terms are broken. For example, residents are woken by cages being rolled outside at 6am, and then again by refuse trucks compacting during the night. The council readily admits that it does not have the resources to enforce breaches. The situation is unsustainable as it is, let alone with the addition of this demanding scheme.
- In an attempt to lessen the impact, we suggested at the outset of his design phase that a micro-distribution facility be provided. We reiterated this request, but the developer would not engage with it.

We ask that any scheme on this site involves consolidation of its own delivery requirements and a micro-distribution facility to help with those in the wider area.

Risk of further unacceptable development

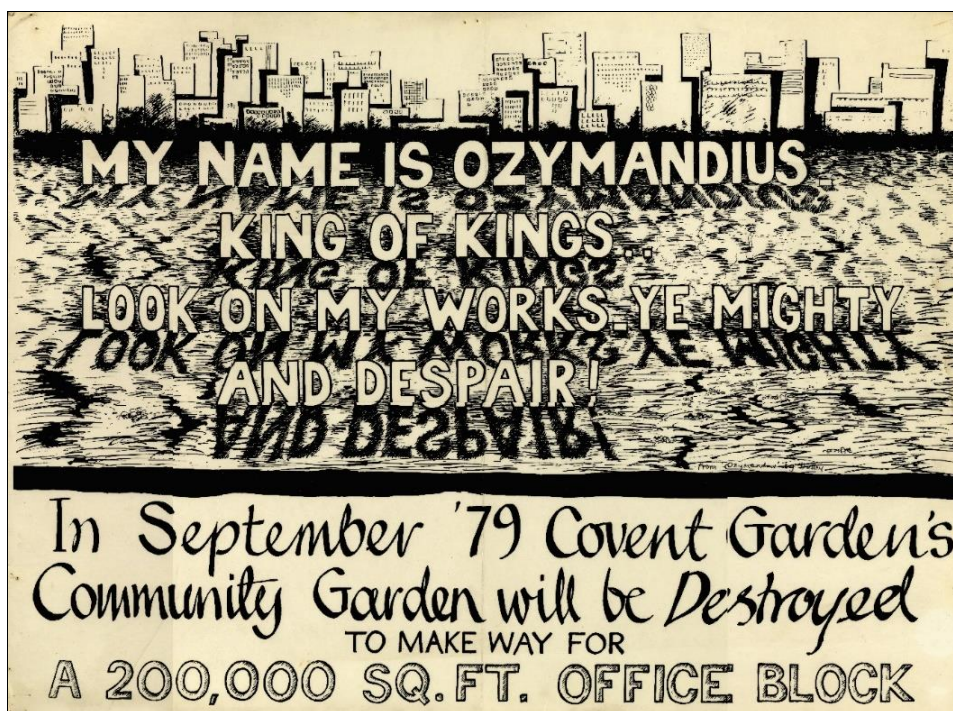
- If London did not need yet another office block in the 1970's, it even less needs one now in the era of home-working. We believe that the current scheme will prove unviable and require yet more development to be permitted in order for work to be completed: maybe more storeys, maybe more bulk, and no new housing if it is not built first. This would put the LPA in an impossible position if the current proposals had already been consented and work started.

We have seen many buildings in the area lie fallow when work starts and then demand drops away or money runs out. They can remain empty, part-demolished carcasses for years. The alternative is to allow something still more unacceptable in order to alleviate an unsightly chronic embarrassment in the centre of our capital city.

- Centrepont stands as a monument to mid-1960's high rise aspirations. It stands alone, as it should. If the campaign to save London's West End, including 65% of Covent Garden, had failed in the 1970s, the surrounding area would have risen up alongside it in concrete.

If another high tower were allowed now in its vicinity then it would not only be ugly in itself, but it becomes more challenging for the LPA to resist the next, and the next.

The hubris of the era is summed up in another poster from that campaign:



Surely we have learned from those mistakes?

We ask you to reject this application, and to urge the applicant to re-think their approach to this site based on principles of sustainability and in sympathy with the World class historic neighbourhood nearby.

Here at CGCA we, together with the many knowledgeable representatives of well-regarded societies and associations whose comments you have seen, stand ready to contribute to making this site beautiful, and satisfying on a human scale.

Yours sincerely,

Amanda Rigby
Vice-Chair

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