

**From:** Helen Stone

**Sent:** 13 August 2023 19:57

**To:** Planning

**Cc:** save museum street

**Subject:** Planning Application no. 2023/2510/P. One Museum Street /Selkirk House. OBJECTION

Attention: Mr David Fowler, Planning Dept, London Borough of Camden

Dear Mr Fowler,

I wish to register my **STRONG OBJECTION** to the current planning application to redevelop One Museum Street.

Here are 10 reasons why the planning application should be rejected:

**1. Lack of consultation.** The refusal of the developer to enter meaningful consultation with the local community is reprehensible. There has been a pretence of consultation, merely to tick your boxes. I have attended some meetings where the architect has simply stated his intentions for the site, and told us that he will not discuss any of our ideas, but the local people would be permitted to make some suggestions about street level planting! The community has prepared a scheme showing how the existing site could be used by retrofitting Selkirk House in a way which is sympathetic to the Bloomsbury Conservation Area and respects sustainability. All attempts by local people to engage with the developer's team have been rejected. At the last meeting held in May 2023, I listened long enough to hear that the architect had no intention to hear our proposals or change anything, so I walked out in disgust.

**2. Tower is too high.** The proposed 74m high tower is out of scale with the adjacent buildings and all of the Bloomsbury Conservation Area. I regard it as a monstrosity. The orange colour has no merit; the tower not only dwarfs the conservation area buildings, but it would be visible from miles around, including from beautiful Georgian squares whose views are supposed to be protected.

**3. Tower is too bulky.** The tower is a massive lump, greedily filling the limited space at the site, to the detriment of sunlight and daylight considerations not only for the proposed accommodation within the site, but also blighting the

neighbourhood and removing views of the sky from many residences nearby, and overshadowing streets and properties to an unacceptable degree.

**4. Overlooking and overshadowing.** The tower and other buildings in the scheme overlook local residents and would invade the privacy of residents. Whilst the planning documents claim the design has been continually TESTED, I would comment that testing only provides observations about WHAT IS; whereas modifications would CHANGE a design to, hopefully, something more acceptable. In other words, it does not matter how much testing has been done if the result is an eyesore and takes away daylight, sunlight and sky views to an unacceptable degree. The results may seem acceptable to the developer, but they contravene good practice, as well as Camden's own planning guidelines, and Camden's own plans.

**5. Out of keeping with local architecture and heritage.** The scheme is designed with no consideration of the small historic buildings in the neighbourhood, and it sticks out like a sore thumb, towering over them and further darkening the narrow local streets. Protected views would be blighted.

**6. Sustainability ignored.** Retrofitting Selkirk House is a very appropriate use of the site and the existing materials. The tearing down of Selkirk House in a 15 month operation would be a disgrace in a borough which has clear sustainability objectives. The developer's calculations on sustainability of the the development are not understood by experts because they are incorrect. Whilst the developer states that much of the existing basement of Selkirk House may be used, they fail to acknowledge that the new scheme will not only waste the rest of the building materials already contained on the site, and require all the new materials of the new deep basements, all the colossal above ground construction, but in addition will require OVER 1880 TONNES OF NEW CONCRETE PILING to limit ground movements during demolition of the existing tower and due to construction of the new. A retrofit would require none of the piling or the materials needed to build the skyscraper. It would need new cladding and services and furniture and fittings - which would be a small fraction of the new build materials.

**7. More than 4 years of proposed demolition and construction.** Local people and businesses have suffered the Post Building development, the construction of Princes Square, an 18 month major refurbishment in Grape Street, and a further ongoing one year refurbishment in Grape Street. This enough. The proposed demolition of Selkirk House involves 15 months of dust, noise, dirt,

lorry movements carting away spoil and dirtying and clogging roads. The proposed construction programme of over 3 years would involve vast numbers of lorry movements to import the building materials, noise, dust, dirt, vibration, and consequent damage to the health of residents and workers. The Health Impact Study in the developer's submission makes a completely false statement, that Selkirk House has been demolished! It most certainly is still standing. Little wonder that the study was able reach reach a conclusion of Neutral/Positive impact on health. Were the truth to be told, and the effects of the demolition of Selkirk House to be added into the assessment, there would most definitely be a very different result: a NEGATIVE impact on health.

**8. Too little Social Housing.** There is a real need for more social housing in the area, and this development provides a perfect opportunity to address the problem, but only a handful of such units are proposed. "Affordable housing" in the scheme will not be affordable to most.

**7. No new public open space.** This is a planning requirement but has been ignored.

**8. Vine Lane: a big mistake.** The idea of constructing Vine Lane is misguided because it serves no sensible pedestrian purpose (Museum Street or Princes Square are the routes to the British Museum), and the narrow, overshadowed Vine Lane will attract drug dealers, drug takers, thieves, and rough sleepers.

**9. Harmful precedent.** The height of the proposed new tower would be a harmful precedent and open the door to other tall buildings, which would change the area forever and wipe out the uniqueness of Bloomsbury with its low rise buildings.

**10. Brand new office buildings are not needed.** There is no requirement for more office space since the pandemic saw a complete change in demand. If new office buildings are continually built, what happens to the old ones which are vacated? They become slums. If offices are wanted in Bloomsbury, which I question, then retrofitting Selkirk House will make perfectly good modern offices.

In addition to the above 10 reasons for rejecting the application, I have prepared a contribution to the Save Museum Street action group's submission.

I add that below as further material to be considered in my representation and objection.

### **One Museum Street.**

Objection based on the Basement Impact & Structural Impact Assessment dated June 2023 and the Health Impact Assessment dated June 2023

The BIA report states the site is directly over Royal Mail Group Post Office tunnels; and additional assets owned by LUL, Crossrail, TWUL and UKPN fall within the zone of influence of the proposed works, as follows:

- • Post Office tunnels
- • LUL Central Line tunnels north of the site under New Oxford St
- • An Elizabeth Line tunnel south of the site under High Holborn
- • Various Thames Water sewers and Mains water pipes surround the site on all sides
- • An existing UK Power Networks Ltd substation will need to be temporarily relocated, and another added

Apart from the risks posed to these assets by the proposed works, mitigation will involve massive and costly piling work to limit both ground heave following demolition of Selkirk House, and then limit settlement when the new 74m tower is built.

This vanity project, to demolish Selkirk House and erect a new, significantly taller tower instead of simply refurbishing what is already there, will involve more than 4 years of noise and disruption for local people and businesses, taking twice as long as the sustainable option of using what already exists and refurbishing Selkirk House.

The deep basement proposed for the Vine Lane building requires a secant piled wall abutting the residential and commercial properties in Grape Street and will involve over two years of construction right adjacent to occupied homes. Local residents are only now recovering from the noise and disruption caused by the Post Building site; an 18month complete office refurbishment in Grape Street; and the construction of Princes Square. They are also currently tolerating a further major refurbishment in Grape Street.

The BIA identifies that the proposed Vine Lane basement pile wall and underpins will create a cut-off to any existing ground water flow paths. There is more site investigation work to be done to identify whether non-static groundwater exists. Groundwater control/dewatering may be required during construction, which will add yet more noise nuisance.

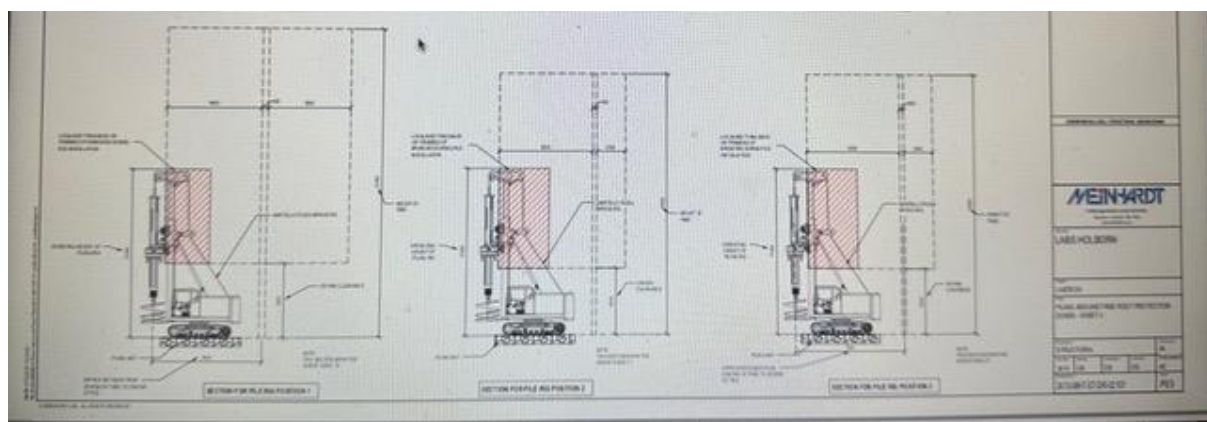
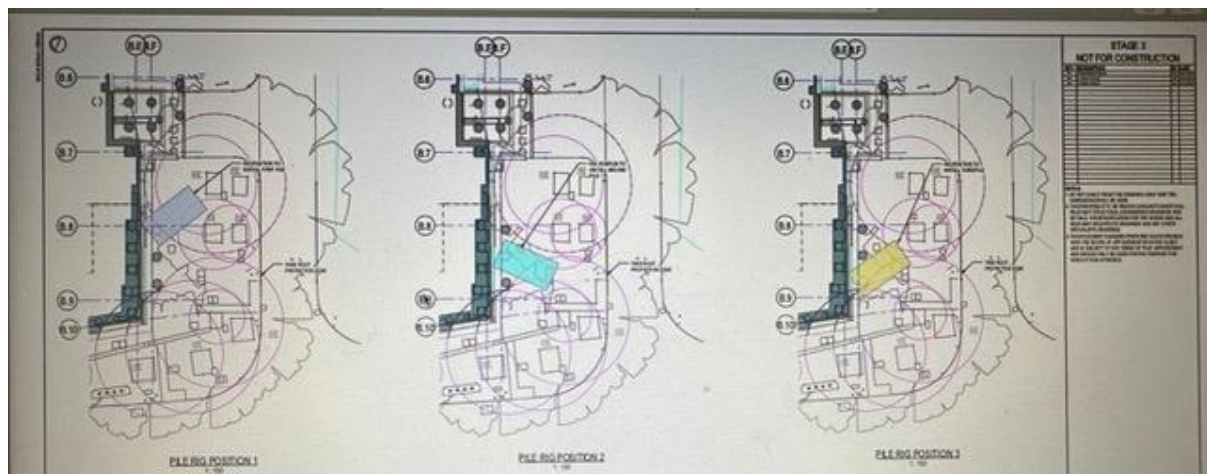
**The second phase of site investigation works is reported to have been halted due to access restrictions.** The planning application acknowledges that significant post-planning investigation will be required to inform the RIBA stages 3 and 4 design and the Phase II Geo-environmental Quantitative Risk Assessment, which could change the design done to date. Already, since January, there has been a significant increase in the designed below ground works. Drawings included with the previous planning application submission showed some 28 piles of 900mm diameter, 20 metres deep, to protect the Post Office tunnels from downward movement (settlement) from the load of the new tower. In the latest drawings, there are now 44 of these settlement reducing piles. This indicates an increase of some 320 metres of large diameter bored piling, constituting an additional 490 tonnes of concrete in the ground.

It is noteworthy that 9 trees are to be felled in tree protection zones, which is in itself a further negative aspect of the scheme, but which will also affect the moisture take-up pattern of the area.

The BIA provides many assurances that there is a low risk of damage to existing assets, but that is highly questionable. For example, next to Selkirk House there are tree root protection zones where a piling rig is going to be working.

Drawings indicate that tree branches will have to be roped back or locally cut off to enable access by the piling rig which has an operating height of 11.5m, working amongst trees of up to 20m height. It is very difficult, if not impossible, to believe that the trees will remain unharmed by these piling operations, as their roots will be susceptible to damage by the piling mat on which the rig stands and also by the weight of the rig, and the branches will be cut or roped back as described above.

Meinhardt's drawing no. 2413-MHT-ST-DR-02100, and -02101 shown below, clearly show the dangers to trees, particularly at the south end of Museum St near High Holborn:



As part of LB Camden's planning procedures, Campbell Reith were appointed to carry out an audit of the previous BIA. The information provided was insufficient to satisfy the requirements of LB Camden's Planning Guidance for basements, January 2021, because whilst questions were answered, in many cases the answers required to be confirmed or changed once further work has been done .

For example, the proposed protection to the Post Office tunnels, which run directly under the present tower, relies on ground stabilisation in the form of constructing 15 no. bored piles of 900mm diameter and 25m deep, before the demolition of the tower is done, to mitigate the potential heave of the ground due to removal of the tower's weight. To construct those piles with the limited headroom available in the building as it stands is a challenging operation and may be close to the limits of any available plant. Specialist company, Martello Piling Ltd, have said it is within their capability. Campbell Reith advised in their audit that due to the complexity of the proposed construction and sensitivity of the surrounding urban area, a **Basement Construction Plan (BCP)** should be submitted to include final construction method statements, sequencing and programming information, and detailed design of basement and foundations work (temporary and permanent). The current planning application does now contain method statements and sequencing information, for example showing that demolition above 4<sup>th</sup> floor level can only be commenced once the 15 piles have been installed, though it is expected that some further detailed design is likely to be required.

Campbell Reith also confirmed that **further investigation, modelling and assessment** was recommended by the BIA; that it had not been completed; and should be carried out, with a final assessment and proposed mitigation actions (if any) confirmed within the BCP. Then, once the BCP has confirmed the final design and construction methodology, the Ground Movement Assessment (GMA) should be reviewed and updated, including a **detailed monitoring scheme and appropriate contingency actions**. Those have not been seen.

The drawing below is a plan of the site from the Basement Impact and Structural Impact Assessment Report, dated June 2023, and shows the Post Office tunnels in green. To the layman, there are 15 blue dots and 44 red dots on the plan of the site.

Each blue dot represents a reinforced concrete pile, of 900mm diameter, and 25m long. Each pile has a volume of 15.9 cubic metres, and weighs about 38tonnes.

Each red dot represents a reinforced concrete pile of 900mm diameter, and 20m long.

Each of these piles has a volume of 12.7 cubic metres, and weighs about 30tonnes.

**The total weight of the 58 reinforced concrete piles is calculated to be 1890 tonnes.**



The engineering and construction challenges and associated risks described above, together with the need for the installation of the 1890 tonnes of piling would vanish if the option to **retrofit** the existing tower was pursued.



Furthermore, the price of demolition of Selkirk House in terms of noise, dust, dirt, disruption, and lack of sustainability, is unacceptably high.

**The Health Impact Study**, dated June 2023, can only be described as a totally misleading, unprofessional piece of work. The statement at page 1, paragraph 1.5, that Selkirk House has been demolished is patently false. If the Health Impact Study has been prepared ignoring the fact that a 17storey tower block is to be demolished, then all the threats to health of the dust, noise, vibration and dirt of the demolition itself will have been ignored, and so too the hazards of carting away the spoil.

The Health Impact Study claims that the development will be neutral or positive to health. It may be an inconvenient fact for the Developer and the author of the study that Selkirk House is still standing, but without acknowledging that fact, and the planned 15month demolition programme, the Health Impact Study is worthless and should be withdrawn. Instead, a truthful assessment should be demanded, which takes full account of all the threats to health resulting from the whole project. The conclusions will be very different.

Finally I wish to make a general observation about the whole planning process around the future of One Museum Street. For this development to have reached the stage it has suggests to me only one thing: the promise of millions of pounds to Camden's coffers has tempted the planners to turn a blind eye to the borough's own standards and values. Were that not so, the planning department could not have encouraged the developer for so long and so far in the current direction.

However, there is still time to Save Museum Street, by rejecting this planning application in full, once and for all, and properly and fairly considering the sustainable alternative.

Yours sincerely,

Helen Stone

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