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**From:** Kathy Doyle [REDACTED]  
**Sent:** 15 August 2023 15:35  
**To:** Planning Planning; David Fowler; SaveMuseumStreet@CoventGarden.org.uk  
**Subject:** OBJECTION to planning application 2023/2510/P and 2023/2653/L

Dear David Fowler,

I am writing to register my **STRONG OBJECTION** to planning application: **2023/2510/P** and listed building application **2023/2653/L**.

Firstly, I would urge you, when considering these applications, to reflect on your position as a public servant. Your role is to act in the best interests of the public. It should therefore carry great weight that despite a propensity towards apathy in the general public a significant number of individuals have taken the time and trouble to write to the Camden Planning Department, on two occasions, to object in the strongest possible terms to this development. They object to the height and size of the tower and the effect it will have on the views across London, their city, and they object equally strongly to the effect it will have on the conservation areas of Covent Garden and Bloomsbury and the iconic listed buildings nearby. The constant refrain in objection after objection has been that the tower is too tall, it is out of place in this location because the whole texture of the nearby heritage areas is small scale. They repeat frequently that even the existing building is too tall and nothing taller should be entertained. I strongly believe that a public servant should listen to the unequivocally expressed views of the public they purport to serve. You work in an area which is of great significance, far beyond that of most Planning Officers. This central London location means a lot, not only to the people of London but to the many visitors from across the UK and the world. It is what makes London a world-class city and it deserves protection. Your decision will affect the character of a great city for many decades to come, it is a big responsibility. Clearly you will have to balance the competing claims in relation to this site but I would urge you not to be unduly swayed by the prospect of additional dwellings, allowing yourself to overlook the fact that 27 dwellings will be lost as a result of this development, or to be influenced by the prospect of £5m in CIL money because destruction of the Bloomsbury/Covent Garden landscape should not be bought so cheaply, in fact the prospect should not be entertained at all.

Some of my specific grounds for objection are as follows:

**Failure to Adhere to the Draft Site Allocations Plan**

1. The proposal can hardly be described as a 'more elegant and refined tower' which is the sort of building you said in your Draft Site Allocations Consultation 2020 would be acceptable.  
<https://www.camden.gov.uk/draft-site-allocations-consultation>.
2. Nor could it be said to, 'more successfully integrate with the surrounding townscape and the Bloomsbury Conservation Area'. It is hard to imagine a development more inimical to its surroundings.
3. Further, by no stretch of the imagination could it be said to, 'respond to the site's varied context, including listed buildings, the setting of specific heritage assets, and the Bloomsbury Conservation Area'
4. Furthermore, it is not of, 'a height and massing that can successfully integrate with the surrounding townscape'. It will stick out like a sore thumb.

The proposals comprehensively fail to meet Camden's own somewhat inexplicable aspirations for the site.

**Adverse Effect on Heritage and Conservation Areas**

The developers are proposing to erect a building of 19 storeys, 74m high, which is grossly bulky, plonked in the centre of the outstanding heritage areas of Covent Garden and Bloomsbury that are visited by many

millions both from this country and overseas. The building will affect views all over London at a distance and also locally. It will affect the views of Grade 1 listed buildings, such as the iconic British Museum, Hawksmoor's St George's church and Bedford Square, the most complete Georgian square in London, surely highly significant assets. Furthermore, it is going to loom over the newly-listed buildings within the conservation area causing serious harm to their setting and allowing them to fall far below accepted levels of daylight.

The scale of additional office and commercial floorspace requires balancing with housing which the developers have chosen to place in the conservation area, damaging the integrity of the listed buildings by destroying the original floorplates of 11 and 12 Museum Street and creating an incongruous deck for access behind with the insertion of new openings to the rear elevations of the listed buildings (35/37 New Oxford St) and 12 Museum Street) or blocking up original openings as is the case to 10 and 11 Museum Street, instead of respecting the original design of the buildings. Added to which, a large and discordant new building will be built along West Central Street which is in no way sympathetic to the townscape and the proximity of the listed buildings.

To my mind this crass development will detract from all that makes the conservation area buildings worth preserving. Their integrity as examples of Victorian architecture will have been destroyed, as will their coherence as part of the conservation area. Short of outright destruction I cannot think what greater level of damage could be done. *It negates the whole point of listing them in the first place* and must have a seriously detrimental effect on the significance of the asset to the extent that it could be said to have drained away. They will no longer be handsome Victorian buildings in their own right but mangled versions of their former selves, serving a wholly inappropriate and misconceived purpose.

In addition, the application plans to demolish 16a/18 West Central Street which is within the Conservation Area, and is the historic stables that Camden's Conservation Area Statement declares is a building that contributes to the streetscape and should be retained. Again, one wonders, what is the point of having a conservation area, if the buildings within it are not conserved. There is no valid reason for demolishing this interesting building apart from the exigencies of the applicant's planned over-development of the other part of the site.

Far from preserving and enhancing Camden's 'rich and diverse heritage assets and their settings, including conservation areas [and] listed buildings', the proposal shows a wanton disregard for the integrity of such assets and settings.

#### **Adverse Effect on Climate Change**

Camden has declared a climate emergency. This planning submission for the demolition and replacement of 1 Museum Street is against UK National Policy, GLA Policy and intentions, and Camden's declared climate and ecological emergency, which requires prioritisation of retention and retrofit. The developer has failed to demonstrate that this is not an option. The existing building has been used as offices and as a hotel. It could again be used for either of these purposes. This might not be the developer's preferred option but it is certainly a feasible and viable option. The demolition of Selkirk House will release 64,000 tonnes of CO<sub>2</sub>e and carbon into the atmosphere – equivalent to burning 152,000 barrels of oil, hardly in accordance with Camden's climate change policies or objectives.

#### **Vine Lane**

Although the idea of increased permeability is superficially attractive, enthusiasm for this passageway should be tempered by a realistic assessment of the conditions on the ground. The creation of Vine Lane is predicated on the total demolition of Selkirk House; therefore, Camden's planners have set one policy aspiration in direct opposition to their policy on retrofitting existing buildings in order to curb climate change. I would venture to suggest that the creation of a narrow passageway, which will rarely see the light of day, which is unlikely to be anything like as attractive as the visuals (for example see the Post Building passage from Bloomsbury Way to High Holborn), and which could well become a venue for drug-taking and other anti-social behaviour, does not justify the demolition of a substantial concrete building with the concomitant adverse effects on climate-change.

#### **Failure to Comply with Camden's Planning Policies** Policy D1 Design

The development fails to deliver on policies D1 a-f, l-n, p-s

Policy D2 Heritage

The proposed development fails to comply with the council's policies on heritage assets e-g, j-k  
Sustainability

CC1

Fails to observe the council's policies CC1 a, e and f

CC2

Fails to observe the council's policies a and c,

CC3 Water and Flooding

Lack of clarity regarding compliance with policies b and c

**Insufficiency and Reliability of Data**

A casual inspection of some of the documents submitted in support of the application shows a serious lack of accuracy and detail. For example:

1. The Basement Impact and Structural Impact Assessment fails to provide sufficient detail as to how this technically extremely difficult and delicate operation would be carried out, bearing in mind the presence of the Post Office tunnels and various other tunnels beneath the structure, which would have to be stabilised both before, during and after demolition and rebuilding. The technical difficulties inherent in such an operation were cited by the owners of the Post Building as the main reason for retaining the existing structure when that building was redeveloped, and as the reason for several prospective developers having backed out of the venture.
2. The Health Impact Assessment must be to all intents and purposes worthless, stating as it does that Selkirk House has already been demolished. If the so-called 'experts' cannot grasp such a fundamental fact, what reliance can be placed on their findings?
3. The Hotel Needs Assessment refers at 4.20 to the Travelodge on Drury Lane being the main hotel and the Travelodge on Museum Street (Selkirk House) being 'overspill'. This hotel was operated as a profitable hotel in its own right, and not as overspill. The demand for hotel rooms in Camden remains high, according to Planning Officer Bethany Cullen, (Meeting with SMS on 28<sup>th</sup> July 2023). Returning the existing building to hotel use would be a more appropriate outcome in terms of climate-change.

This entire development is an example of an attempt at gross over-intensification of a site to the detriment of its surroundings and to the extreme detriment of the adjacent listed buildings which are to be mangled as a way of justifying the developer's craving for gargantuan over-development.

I urge you to reject this application out of hand and encourage a sustainable development in its place, which respects its unique architectural and historic surroundings.

Yours sincerely,

Kathy Doyle

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