

From: Peter Bloxham

Sent: 22 September 2023 14:42

To: Planning

Subject: planning and listed building applications 2023/2510/P and 2023/2653/L

Re: Composite Planning and Listed Building Applications (*Composite Applications*) in respect of proposals for the development of a series of plots bounded by High Holborn, Museum Street, New Oxford Street and West Central Street including Selkirk House, Museum Street (formerly Travelodge) (now reference 2023/2510/P and (listed building) 2023/2653/L), originally Labtech application 2021/ 2954/ P)

Dear Sirs

This is a further submission in **objection** to the Composite Applications.

The Composite Applications are premature

Whilst it is open to BC Partners to decide when to submit the Composite Applications, this should not be used as a method of avoiding transparency.

There are several reasons why the Composite Applications are currently premature:

- The lack of proper consultation already mentioned and the subject of a separate submission,
- more generally, the absence of a free flow of essential information,
- The lack of clarity on key facts. For example, if it is correct that Labtech, the previous owner, have been consulting and engaging with “stakeholders” since 2017, it is extraordinary that up until fairly recently neither the Council nor Labtech seemed to have a clear appreciation of the exact amount of residential accommodation already in existence on the site,
- The opacity of the “subsidiary” proposals, for West Central Street and the New Oxford Street block. In particular, I draw your attention to the fact that a meeting was requested in January 2023 to discuss

specifically issues related to proposed West Central Street structures but has still not taken place.

As a result, it is impossible to make comprehensive and informed comments on the Composite Applications. The essential process of public involvement has been frustrated.

I appreciate that it may seem strange to claim that process which has, so far, been so leisurely is premature. However there is in fact no inconsistency in this claim, for the following principal reasons:

- The Council is on record as having stated that the original 2021 application was incapable of acceptance in its original form. It is hard to see how a 6 metre reduction in height (“compensated” by an increase in bulk) transformed the proposal into something which might be capable of acceptance.
- The applicant seems to have taken no notice of the unprecedented level of objections to the 2021 application, instead seeking to evade them by submitting the 2023 (according to the applicant) ”substantially unchanged” Composite Applications.
- It is evident from Freedom of Information data that the Council’s officers have had to devote considerable amounts of time over the years to addressing some (only) of the many problems to which the Composite Applications give rise. Many important problems, such as light levels and dealing with asbestos, appear still to be unresolved. They are too important to be left to opaque “after the event” discussions between the applicant and Camden, without involvement of those affected.

Alternatives?

The applicant has failed to consider sensible, sustainable, more economic and deliverable alternatives to its own overbearing proposals.

When one considers the substantial footprint of the Selkirk House block and then looks at the proposal for the bulky 74 (originally 80) metre tower block, it is hard to avoid the conclusion that the proposal is perversely provocative.

If the volume of office space apparently needed by BC Partners to make its proposal work so as to make money for its private equity backers were spread more evenly over the entire footprint of the space on the edge of the Bloomsbury Conservation area, and the curious “Vine Lane” proposal dropped, one might begin to have a design which is at least no more conspicuous and overbearing in height terms than the existing Travelodge. Private equity (investing through opaque offshore vehicles) should not profit at the expense of Bloomsbury, its environment and heritage and its communities. It is hard to imagine how Labtech came up with the current proposal as the “only” solution, now inherited by BC Partners. Obviously it would help to have clarity of the demands which Labtech has claimed the Council is making of the applicant.

Because of the deliberate lack of consultation on the part of Labtech, it is impossible to know what alternatives Labtech has looked at since it started “consulting” in 2017. I am aware of earlier proposals drawn up by T P Bennett.

BC Partners and, before them, Labtech have chosen to acquire a very difficult series of sites (some now listed), both because of their situation and because of the existence of the Royal Mail railway tunnels underneath it. This leads to proposals which include elaborate risky and very intrusive piling exercises planned to take place in dense urban environments very close to listed buildings and possibly within the Bloomsbury Conservation Area. They have also chosen to make their own task of monetising their acquisition even more difficult by proposing to demolish the existing building (the bulk of which the applicant implicitly criticises) and to erect in its place an even taller, bulkier and more conspicuous 74 metre tower block. Quite apart from the piling exercises mentioned above, the general engineering problems associated with the demolition of the existing building and the erection of the proposed 74 metre tower block must be formidable. Even the demolition in such a confined space would be difficult to execute unless BC Partners have no concern for those who live and work in its immediate vicinity, as well as those who seek to use High Holborn and Museum Street as thoroughfares and, more generally, for the environment.

A less tall building might also have the advantage that the structural issues should be considerably less challenging.

Even with the limited information available, it is quite clear that, having regard in particular to the constraints caused by the existence of the Royal Mail railway tunnels (which are excluded from BC Partners' title), the structural issues would be very complex. Experience of the extensive pile driving by the Shaftesbury Theatre has made local residents (of which I am one) very aware of the intolerable noise and vibration nuisance (and consequent headaches) this causes.

One of the many absurdities of these proposals is that the applicant seeks to criticise the existing Travelodge and at the same time to advocate the merits of its own much taller, bulkier and more prominent proposed tower block.

This approach is all the more disappointing when Labtech, who initiated these proposals, has recent local experience of avoiding the need for demolition. Labtech purchased the trophy building close by on Bloomsbury Square which used to be the London home of the Liverpool Victoria Mutual Society and has (presumably successfully and profitably) converted the building to Labtech's own purposes. I note that they have recently made an application for conversion of some of those offices into medical research facilities, which may be an indication of loss of confidence in the central London office market.

By contrast I am aware that Travelodge, which previously occupied the building and has premises in Drury Lane, has been seeking to expand its local presence. It would be so much easier to refurbish the existing building and restore the hotel use.

Alternatively, the LSE or another of the local higher education institutions might be interested in refurbishing the existing building as a hall of residence for its students.

Regards
Peter Bloxham