

From: Bloomsbury Association
Sent: 25 September 2023 12:51
To: Planning Planning
Cc: David Fowler; Chair Association
Subject: APPLICATION FOR PLANNING PERMISSION 2023/2510/P & 2023/2653/L - 1 MUSEUM STREET
Attachments: SUBMISSION STRUCTURE_3.pdf; 8 OPEN SPACE AND PUBLIC REALM.pdf

**SELKIRK HOUSE, 166 HIGH HOLBORN, 1 MUSEUM STREET, 10-12 MUSEUM STREET, 35-41 NEW OXFORD STREET & 16A-18 WESTCENTRAL STREET
LONDON WC1A 1JR**

Proposal:

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.

Application for planning permission reference: 2023/2510/P

Application for listed building consent: 2023/2653/L

The **Save Museum Street** group's comments on these applications are being submitted incrementally as attached.

Stephen Heath

On behalf of the Bloomsbury Association



SaveMuseumStreet@CoventGarden.org.uk

0207 836 5555

@MuseumSave

5 Willoughby Street, London WC1A 1JD

1 MUSEUM STREET, LONDON WC1A 1JR

Application for planning permission: 2023/2510/P and

Application for listed building consent: 2023/2653/L

Save Museum Street, which comprises the organisations listed below, **objects** to these applications. Our concerns are set out in the following sections, which will be submitted individually, as will the documents shown in the list of supplementary documents. A composite document will follow.

	Section name	Attached
1	Sustainability, environmental, climate emergency	●
2	Housing	
3	Townscape and visual impact	●
4	Heritage impact	●
5	Design quality	●
6	Community engagement	●
7	Daylight and sunlight	
8	Open space and public realm	●
9	Basement impact	●
10	Transport, access and servicing	●
11	Construction management and noise	●
12	Hotel use	●
13	Phasing and financial appraisal	●
14	Health impact	●
15	Policy non-compliance / information required	

List of supplementary documents

	Document name	Attached
1	Alternative Approach	
2	The Carbon Case for Retention and Retrofit 1 by Targeting Zero, dated 15 March 2023	●
3	The Carbon Case for Retention and Retrofit 2 by Targeting Zero, dated 5 July 2023	●
4	The Carbon Case for Retention and Retrofit 3 by Targeting Zero, dated 5 September 2023	●
5	Heritage Statement by Peter De Figueiredo	●
6	Historic Assessment - 'Heavy Going: A study of the history, building typology and conservation of Working Horse Stables' by Shannon Edwards, University of York	●
7	Statement from Dr Geoffrey Tyack FSA, FRHistS, Kellogg College, University of Oxford	●
8	Daylight and Sunlight Report by Right of Light Consulting	
9	E-mail from Regional Manager, Travelodge	●
10	E-mail from Camden Conservation Officer	●

Save Museum Street Campaign: led by a community coalition including:

Bloomsbury Residents' Action Group
Bloomsbury Association
Camden Climate Emergency
Charlotte Street Association
Covent Garden Community Association
Covent Garden Area Trust
Drury Lane Residents Association
Dudley Court Tenants' Association
Goldsmith Court
Grape Street Residents

Leicester Square Association
Red Lion Residents Association
Rugby & Harpur Residents Association
Seven Dials Trust
South Bloomsbury Tenants and Residents' Association
Tavistock Chambers Tenants' Association
The Bedford Estates
The Soho Society
West Central Street Residents
Willoughby Street Residents

8 Public Open Space, Play Facilities, Public Realm and Private Outside Space

8.1 Public Open Space

8.1.1 Both the London Plan (Policy G4 (B)) and Camden's Local Plan (Policy A2) make it clear that new public open space, in areas where there is a clear deficiency, including in the Central Area, is to be provided, and that improvements to the public realm are secondary considerations. Large scale developments are **expected** to provide public open space and play facilities. Developers must show that it is not feasible to do so, *before* any suggestion of offsetting the failure to comply with public open space planning policies, is to be considered. Improvements to the public realm and financial contributions in lieu are clearly **not** the default position.

8.1.2 Camden has identified Covent Garden/Holborn as an area seriously deficient in public open space and areas deficient in access to Children's Play Provision (see Open Space Sports and Recreation Study and Plan 2 Camden Local Plan). The planning application falls within the Covent Garden/Holborn ward. In addition, the household occupancy in the ward is 2.28 which matches the highest level within the whole of Camden (see Appendix E in Camden's Public Open Space Supplementary Planning Guidance 2021). There is clearly a need to provide **new** public open space and a need to provide access to good quality children's play facilities if the GLA's London Plan and policies in Camden's Local Plan are to be addressed.

8.1.3 Camden's Local Plan defines what it means by Public Open Space in its Open Space Supplementary Planning Guidance published in 2021, that states in paragraph 1.4:

"Public open space is open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone."

And goes on to say that in paragraph 1.27

"Private amenity space, such as gardens and balconies, do not provide a substitute for the particular experience and opportunities for interaction provided by public open space and therefore, should not be counted towards meeting a scheme's open space contribution."

And para 1.24 states

"Given the amount of hard surfaces in Camden, our priority will generally be for green spaces. The Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified."

Camden's Local Plan eloquently states the case why the provision of public open space is so important in paragraph 6.31 under the heading 'Provision and enhancement of open space'

"Open space is critical to sustainability and wellbeing. It performs a social role by providing a variety of areas in which to relax, socialise, enjoy sport and take part in physical exercise. This is especially important at a time when the Council is seeking to address the prevalence of obesity and weight issues and their link with conditions leading to premature death. Quiet areas of green space can enhance personal wellbeing and play space is an important tool in supporting the development of children and young people. Businesses are more likely to invest in areas which offer attractive green spaces. The upgrading of open spaces and the public realm is often a key driver of regeneration and renewal"

The Local Plan goes on to say in paragraph 1.7

“Policy A2 outlines the need to ensure that growth in the numbers of residents and workers in Camden will be supported by increases in public open space provision. It states that public open space within a development site is the Council's priority, with off-site provision when this is not feasible. Where applicants can demonstrate to the Council's satisfaction that it is not possible to provide public open space on or off site, the Council will accept a financial contribution towards other public open space in the area”

Paragraphs 1.8 and 1.9 go on to say

“The increase in population from new development will place additional pressure on existing facilities, which without mitigation will be detrimental to the quality and standard of the borough's open spaces.”

and

“The Council *will give particular priority to creating new public open space where a development is proposed within the deficiency areas*, or their catchment areas, as shown on Map 2 of the Local Plan.”

(The development site is within a deficiency ward)

And para 1.12 states

“There is a particular need *to take a creative approach* to delivering open space south of the Euston Road. This may include the greening of the public realm, for example through the provision of pocket parks or reclamation of road space.”

8.1.4 The developer has not been asked by Camden Planners why their proposals contain no public open space on or off the site, and the developers have demonstrably failed to take ‘a creative approach to delivering open space’ despite the expressed need for more open space in this part of Camden. Clearly the development is contrary to the London Plan and Camden's Local Plan Open Space planning policies.

8.1.5 In addition, the Council and developer has been shown in the Alternative Proposals prepared by SMS Coalition, that there is a creative approach available, namely to provide public open space at roof level. Moreover, there is an example of just such an approach right on the doorstep of the development site, namely the Post House development opposite that recently took place where a public roof terrace has been incorporated into the overall development, though the size is very significantly smaller than should have been provided to comply with Camden and the GLA's requirements.

8.1.6 The development is located within the Tottenham Court Road Growth Area and policy (see para 2.29) states Development within the Tottenham Court Road growth area should contribute to the Council's wider vision and objectives for this part of the borough.

- development 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;¹

¹ The failure of the development “to enhance and conserve the significance of the heritage assets such as the character and appearance of conservation areas” is discussed in a separate submission, but it is self-evident from the adverse comments concerning the damage the development will do to the setting of listed buildings, damage to important views and the conservation areas that have been submitted to Camden from

- remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces.

Clearly the proposals do not endeavour to provide any public open space

8.1.7 The Local Plan sets out how Camden Council, will secure new public open space, which developments are expected to contribute towards public open space and play facilities, and applies the policies of the GLA London Plan. The Council's Open Space Planning Guidance sets out the GLA's requirements (see para 1.6)

8.1.9 All developments will need to make a contribution to the provision of new public open space and play facilities when the development falls within the following categories:

1. 11 or more additional dwellings - the development proposes 22 additional dwellings.
2. Student accommodation - not applicable.
3. Developments of over 1,000sqm that will increase the working population - the development proposes 24,131 sqm office/commercial space.

8.1.10 It is self-evident that the development falls within criteria 1 and 3 above. It should provide new public open space and new play facilities especially as the site is within a ward that is designated as being seriously deficient in both.

8.1.11 The London Plan stipulates how new public open space and play space provision is to be calculated and this is repeated in Camden's Local Plan Policy A2 which sets out under the heading 'New and Enhanced Open Space' (paragraph 6.31) how the quantity of required new public open space is to be calculated

"Apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial and higher education developments while taking into account any funding for open spaces through the Community Infrastructure Levy"

and

"Give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision"

and

"Give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space"

And para 1.23 of Camden's Open Space Supplementary Planning Guidance states

'The Open space standards set out in the Local Plan relate specifically to **public open space**. Public open space means open space which is fully accessible to members of the public and provides an inclusive environment in which all communities feel welcome. Free

many organisations including Historic England, The Georgian Group, The Victorian Society, The Bloomsbury Area Conservation Advisory Committee and a large number of the public individuals, the proposals utterly fail to meet this Local Plan objective

public access will normally be available throughout the year, although the sensitivity of some nature conservation sites may justify restrictions to access.”

And paragraph 1.24 goes on to state

“Given the amount of hard surfaces in Camden, our priority will generally be for green spaces. The Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified.”

8.1.12 Applying the Council’s policies that residential development should provide 9 sqm per occupier and for commercial development 0.74 sqm per worker:

The developer’s scheme should provide as a consequence of the *additional residential* element (22 additional dwellings with a potential occupancy of 58 persons x 9 sq m) **522 sqm public open space**

8.1.13 The developer’s scheme consists of 24,131 sqm of *commercial* floor area and Appendix F Supplementary Planning Guidance Public Open Space page 29 shows how to calculate the total public open space the development should provide ($24,131/12 \times 0.74$ - 12 is the number of employees per sqm for a professional services organisation like offices) which comes to 1,488 **sqm of new public open space.**

Consequently, the total public open space area the development should provide is therefore 2,010 sqm (522 + 1,488 sqm) in order to comply with the London Plan and Camden Local Plan

8.1.14 The developer’s proposals include a ‘pocket green space’ (developer’s description) which is the only element of their ‘open’ space provision that could possibly be called public open space. They describe this facility a public realm facility, as it is within their private ownership and rightly do not offer it as a public open space. The area of this “pocket green space” is tiny and is likely to be prejudiced with the inclusion of extract and intake air ducts that will be required but are currently not indicated in order to serve the basement areas.

8.1.15 There is clearly a huge discrepancy in the Public Open Space that should be provided and what is being provided which **is precisely zero sqm**, and it is clear that the developer’s scheme does not complying with GLA and Camden’s Planning Policies set out in their local plan and their Supplementary Open Space Planning Guidance. *There is no evidence that any effort has been made by the developers to address the need to provide any public open space and the required quantum of children’s play area.*

8.1.16 As the alternative design approach has demonstrated, the existing roof of Selkirk House could be transformed into a public open space and if the single storey sheds were removed from the West Central St/Museum St/New Oxford Street block to create Stable Yard, which could incorporate a dedicated children’s play area, the site could provide up to 740sqm Public Open Space on site which, while being well short of the 2010 sqm target, is a significant contribution towards the total.

8.2 Children’s Play Facilities

8.2.1 The overall development includes 19 affordable dwellings that will ‘generate’ (a terrible planning term) 17 children and the 25 private/market housing will ‘generate’ 11 children giving an overall total of 33 children, of which 25 are located within the West Central Street/Museum St/New Oxford Street block.

8.2.2 The London Plan stipulates (see para 2.2.16 Play Supplementary Planning Guidance - SPG) that any new housing development that ‘generates’ more than 10 children must provide suitable

play space and that paragraphs 4.5 to 4.7 of the Play SPG sets out the type and quantity and location for different age groups, placing particular emphasis on securing on-site provision for children under 5. This is particularly important provision in areas defined as deficient, as applies to the development, site and that such play provision *cannot* be off-set by off-site provision.

8.2.3. The GLA Policy S4 set down that 10 sqm play area should be provided per child. Hence the West Central Street/Museum Street/New Oxford Street block should provide a minimum of 250sqm of dedicated play space. Camden's Local Plan says that where the 9 sqm open space provision is made for additional residential accommodation then a lesser figure of 6.5sqm rather than the London Plan's 10sqm would apply. But as the development scheme failed to meet the 9sqm requirement that totals 552 sqm (see above), then it is reasonable to apply the London Plan 10sqm rule for play space provision

8.2.4 The deck at first floor level within the West Central Street/New Oxford Street/Museum Street block is primarily an access deck with some planters separating hard pathways as can be seen on the architect's drawings (295 _P20.101 rev c and detailed layout of the deck). The total area of this deck is given as 151 sqm, so not only is the area 40% too small, but cannot be described in any way or form as a dedicate children's play area. It is even too small if the lesser 6.5sqm rule were to be applied, especially as most of the 151 sqm area of the access deck is just hard surfaced pathways.

8.2.5 The GLA calculate that 66 sqm play space dedicated to 1-4 age group is required, but no such provision is included. The developers might say that they can provide this facility as part of the access deck, but it would be of very poor quality due to the lack sunlight and being permanently in shadow. Moreover, the facility would prejudice the amenity and privacy of adjacent accommodation

8.2.6 In addition, both the GLA London Plan and Camden's Local Plan stipulate that play areas should have direct sunlight and benefit from good daylight. Camden's Open Space Supplementary Planning Guidance expressly states that quality must be provided when designing play and open space and states (Appendix D Ensuring Quality when designing public open space)

"Consideration of microclimate should encourage positive use and not prevent enjoyment. This should include identification of sunny areas and prevention of excessive wind. Areas where a comfortable microclimate cannot be delivered will not be considered as suitable public open space (sic. play areas) provision. Open spaces should not be dominated by movement corridors, including access routes in and out of the associated development"

8.2.7 The GLA's Housing Design Standards published June 2023 states the obvious, that the orientation of new buildings is important and you should not have taller buildings on the south side of a site as it will inevitably cause shade to the residential properties to the north and to the area between. In the case of 16a/18 West Central Street, it is located on the south side of the block and is the tallest building within the whole of the urban block and is completely alien to the historic morphology of this part of the Conservation Area. The fact that the tower block is also on the south side of the housing block will make the situation even worse and both buildings are clearly contrary to GLA recommendations

8.2.8 The London Plan has a number of relevant planning policies that the current development/public open space/Public Realm the Policy and housing design fails to meet namely:

A1.4 states

Heritage assets and their settings should be conserved, enhanced and integrated into the design of new development. They should contribute to the sense of place and make a specific contribution to placemaking and regeneration.

Policy A.1.7 states:

The height and massing of new development should align with the design parameters and guidance for sites where this is set out in a local plan, design code, or other policy or guidance document. In areas that are not identified as those that may be appropriate for tall buildings, the height of new development should not exceed the relevant tall building definition. In areas that are within these designated areas, the height parameters should not be exceeded

Policy 1.1.8 states

Particular consideration should be given to the impact of new development on the level of daylight and sunlight received by the existing residents in surrounding homes and on existing public green space.

Policy B.9.5 states:

Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used.

8.2.9 The Access Deck will be almost in shadow all the year round as a consequence of the 74m high office block adjacent and the 5/6 storey proposed development along the north side of West Central Street. Almost every day of the year the yard will be a dark, dank and thoroughly unpleasant space and certainly not conducive to a comfortable environment for outside play space or as an amenity space. It clearly does not comply with the GLA London Plan policy B.9.5 see above. The availability of sunlight should be for all open spaces where sunlight is required. The BRE guide recommends that, for an open space to appear adequately lit throughout the year, at least 50% of its area should receive two hours of sunlight on 21 March. Based on the facts and analysis undertaken by the developer's daylight experts GIA, the communal amenity area within the access deck will receive 0% sunlight on 21 March due to the excessive overshadowing from the tower block and the redevelopment of 16a/18 West Central Street.

8.2.10 The access deck will be penetrated with a variety of air intake and extract outlets, two such ducts are shown on the layout of the access deck but no details given, and what is shown will clearly be inadequate in size and location, bearing in mind what uses are shown on the proposed layouts of the ground and basement floors under the access deck. It is inevitable the required penetrations will adversely affect the amenity value of the access deck and they are another reason why the access deck proposal, doubling as an amenity space, is not policy compliant.

8.2.11 The access deck/ first floor yard, and new-build block along West Central Street (these elements are intertwined) clearly does not comply with Camden's Local Plan policies D1 and D2 which set out the need for new developments to be of a good standard. The proposal utterly fails in achieving a high-quality design and fails by not taking the opportunity available for improving the character and quality of the Conservation Area and existing residential accommodation within the West Central Street/Museum Street/Oxford Street block (see Policy D1 and D2 para 2.3). Indeed, it significantly damages the amenity of all the adjacent properties and existing residential accommodation, as it will increase overlooking, substantially reduce daylight and sunlight penetration, reduce privacy, and due to the close proximity of the proposed 74m high tower block will result in a very unpleasant and windy micro climate. All of these attributes conflict with Camden's Amenity Planning Guidance published in 2021 Policy 2 Overlooking Privacy and Outlook, Policy 3 Daylight and Sunlight, Policy 6 Noise and vibration.

8.2.12 The applicants state that the area of the access deck within the West Central Street, Museum Street and New Oxford Street block is to double up as both a children's play area as well as communal open space for residents that traverse the access deck to their accommodation. On both counts the quantum of space is grossly inadequate when compared to what the GLA and Camden standards require and the quality of space is extremely poor.

8.2.13 If it is suggested that the failure to provide the required level play space to comply with the standards set by the GLA or for that matter Camden Council is a consequence of the tight inner-city site and site restraints, then clearly the Alternative Proposals submitted by SMS coalition show that this is not the case. By reinstating the historic, Stable Yard, open to the air at ground level, and retaining 16a/18 West Central Street, all the open space and children's play-space failures of the current proposals for the West Central Street, Museum Street, New Oxford Street disappear.

8.2.14 The failures associated with the developer's proposals and the innumerable instances of noncompliance with Camden's Amenity and Open Space SPGs would also vanish. The proposed reinstatement of Stable Yard will provide 225 sqm of public open space from which the dedicated 66 sqm play space facilities for 0–4-year-olds can be easily accommodated. The fact that the existing 16a/18 West Central Street is only a 3-storey building (rather than the 5/6 storey and much bulkier replacement proposal) ensures much better daylight penetration and will have the added benefit that Camden's Amenity SPG requirements will be met. The proximity of the proposed 74m high tower block will remain a huge impediment to a good overall urban design, but at least the northern section of the site will have a design clarity, be sympathetic to the conservation area and listed buildings, and provide good quality housing with good open space and play space.

8.3 Public Realm

8.3.1 Both the Council and the developers rely on the claim that the benefit accruing from the public realm improvements and proposed housing are so great as to offset any damage caused by the demolition of Selkirk House, construction of a significantly taller and bulkier tower block, and the demolition of the acknowledged buildings of merit in Museum Street.

8.3.2 The public realm works can be split into two.

- i. The first is 1083 sq m of public realm works within the land owned by the developers, consisting of Vine Lane, a proposed new alleyway/narrow walkway parallel to Grape Street, linking West Central Street to High Holborn and containing a 'pocket park'
- ii. The second public realm area is 729 sqm of improvements of the existing pavements and roads, along Museum Street, High Holborn and West Central Street

8.3.2.1 Public Realm: Vine Lane.

8.3.2.2 The Council has published two consultative planning briefs as part of its Opportunity Development Sites appraisal that is to be incorporated into the Local Plan. The first report dated 9 September 2013 section 4, only concerned the buildings within the Bloomsbury Conservation Area bounded by New Oxford Street, Museum Street and West Central Street and the planning brief set out a number of requirements that any development would be expected to undertake including:

- Retain and preserve the architectural and historic character of the listed buildings and other heritage assets on the site.
- Preserve and enhance the character and appearance of the Bloomsbury Conservation Area, the setting of listed buildings including the British Museum and sustain and enhance the other buildings which positively contribute to the conservation area.
- Maintain an active frontage to New Oxford Street.

- Make a contribution to improving the public realm providing more pedestrian space in the vicinity of the site, improved crossing facilities across New Oxford Street and better north-south links.
- Provide or contribute to the provision of new open space.

8.3.2.3 The description of the proposed design brief received public support. It is important to stress the need to provide more open space was an *expectation* of any development and the retention of 16a/18 West Central Street, a building that positively contributes to the Conservation area, *was expected*.

8.3.2.4 There was no suggestion of a cut-through to High Holborn, probably because the opportunity site only concerned the Conservation Area block, but there was a clear recognition that better crossing of New Oxford Street/Bloomsbury Way is a high priority (none is proposed in the current application, though of all public realm improvements this would be the most significant). What is remarkable is how the conservation-led approach as to how the block was to be treated was completely ditched in the later version, when Labtech developers bought the site and the adjacent Selkirk House and assisted Camden in drafting of the next version of the opportunity site.

8.3.2.5 The second version of the Opportunity Sites was published in 2020 and consultations held in 2021.

8.3.2.6 This time the opportunity site (HCG3) was extended to include Selkirk House, and it included the idea of a cut through from West Central Street to High Holborn and the possibility of a taller tower block in place of the existing Selkirk House. These elements of the revised draft were as a consequence of property developer Labtech and Camden Planning Policy unit working together; the treatment of the northern section was not recorded as part of the Bloomsbury Conservation Area but as a potential development block to locate housing that would be required as a consequence of the new taller proposed tower block.

8.3.2.7 Consultation took place and the overwhelming response was highly critical of the proposed increase in height of a new tower block, and the idea of the cut through, that the developers now call Vine Lane was rejected. (See Draft Camden Site Allocations Local Plan Summary of initial consultation and engagement published November 2022)

8.3.2.8 The Council has yet to consider this report, so the current status of the Opportunity Sites and for that matter Holborn Vision cannot be described as Council Policy. Certainly, in the case of the Selkirk House Opportunity site HCG3 and the idea of a cut through has been rejected overwhelmingly by the general public. The reason is self-evident when the quality of the cut through, as is shown very clearly in the developer's model of their proposals, is considered (see below). The developer's effort to use the existence of these emerging policy documents as reasons to justify their proposals should have recorded that the public comments received are overwhelming in opposition to the idea of Vine Lane and a larger tower block.

8.3.2.9 The statements by the developers that their scheme complies with emerging policies is a falsehood, as the documents have not been considered by the Planning Committee and the overwhelming public response has been negative. Of course, it may be the Council has no intention to consider public comments, but that begs the question, why in that case did they invite public comment, if it is to be ignored?

8.3.2.10 The idea of Vine Lane is also contrary to Camden's Local Plan policies D1 Design and D2 Heritage as the proposal damages the character and quality of the locality and the site in particular. There is absolutely no historical precedent for the cut-through and the proposed Vine Lane will seriously erode the historical street layout. Moreover, there is no benefit gained by the route through the site as the alleyway makes no connections and follows no desired pedestrian route.

8.3.2.11 It certainly does not improve connection between Covent Garden and The British Museum, as the developers would wish everyone to believe, as the route does not go to the British Museum and starts at a section of High Holborn where there is no pedestrian crossing, let alone road refuge. The most direct route from Covent Garden to The British Museum from Drury Lane is appropriately named Museum Street. It also will be a most unattractive narrow passageway that will be exceedingly dark and permanently in shadow as a consequence of the adjacent tower block.

8.3.2.12 Policy D1 Design and Heritage states as its first requirement that the Council will require that developments

- respects local context and character
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage

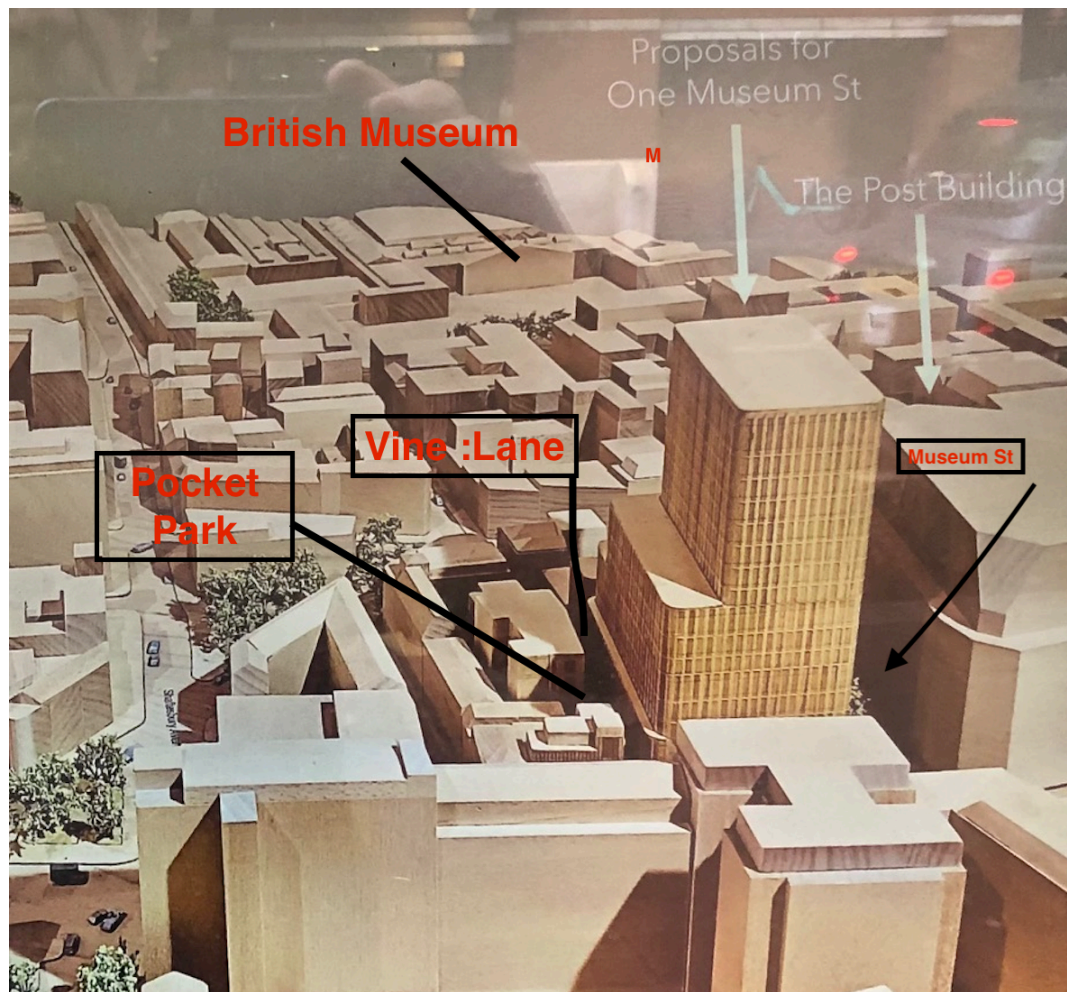
8.3.2.13 Vine Lane does neither. It is entirely an artificial construct to enhance the commercial frontage of the development, but as the alley and pocket park attached, is so narrow, will be in shadow all year round, and only receive sun on the equinox, it will be a very unattractive space, and will be infrequently used, as it makes no connection between anywhere. What it is very likely to attract is anti-social behaviour and in time is likely to be gated in order to combat anti-social behaviour and crime (in contravention with Camden's Design policy D1).

8.3.2.14 The local Plan Design D1 goes on to say that the Council will require that developments

- integrate well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage

8.3.2.15 Vine Lane fails to satisfy any of these requirements; it does not integrate well with surrounding streets, as it destroys the historical street layout; it does not improve movement through the site as it connects nowhere to nowhere and certainly is not an easily recognisable north south route as it is an entirely artificial construct, unlike Museum Street, and will not contribute to the street frontage as the retail units off the alleyway are very likely to remain empty as it is a very unappealing passage with minimal footfall. The alleyway will be overwhelmed by the office tower, and the seven-storey rising to eight blocks on the west side and the proposed architecture has rightly received highly critical comments from Save as well as the Victorian Society. Vine Lane will be grim and the same applies to the minuscule pocket park off it. Rather than being a public benefit it is likely to become a considerable public nuisance. Vine Lane does not lead to a realistic destination but to a four-lane road with no safe means of crossing.

8.3.2.16 The accompanying image below is of the developer's model of their scheme. The dingy nature of Vine Lane is all too apparent and is shown to be overwhelmed by the proposed tower block adjacent, and by the residential block alongside the west side, backing onto Grape Street's existing residential accommodation. As the model shows, the daylight and sunlight penetration to both Vine Lane, the 'pocket park' and Museum Street will be miserable, and certainly the development public realm around the tower block will not be attractive and welcoming spaces.



8.3.2.17 Camden Planning Guidance concerning Landscaping and the Public Realm under the heading Ensuring quality in the provision of new public open space states:

- Consideration of microclimate should encourage positive use, and not prevent enjoyment. *This should include identification of sunny areas and prevention of excessive wind. Areas where a comfortable microclimate cannot be delivered will not be considered as suitable public open space provision.*
- Open spaces should not be dominated by movement corridors, including access routes in and out of the associated development.

Clearly neither Vine Lane nor the pocket park meets these requirements and neither are policy compliant

8.3.2.18 In addition, the planning guidance sets out general principles of landscape design applicable to the public realm and open space in paragraph 4.62. High quality public realm must:

- Provide attractive streets and spaces.

8.3.2.19 Because of its narrowness, being in permanent shadow and dark, with no sunshine, following no pedestrian 'desire line' and being overwhelmed by the adjacent office block, Vine Lane will certainly not be an attractive street and space and again is not policy compliant.

8.3.2.20 The same planning Guidance goes on to say in 4.21 that public realm areas in new developments have to show:

- how the scheme would reduce opportunities for criminal and anti- social behaviour

Clearly the narrow Vine Lane which will be shaded and dark all the time, except at high summer, and *will encourage* criminal and anti-social behaviour, is clearly not policy compliant. This might be resolved by gating the alleyway, but then the developer's claim that Vine Lane will improve the public realm is clearly a falsehood as it will not be available to the public 24hrs a day.

What Vine Lane actually does is to *design in* future criminal and anti-social behaviour. It has no intrinsic public benefit but rather a considerable dis-benefit.

8.4 Museum Street, High Holborn and West Central Street

8.4.1 Museum Street in front of the tower block.

8.4.1.1 Currently the existing Selkirk House is set back some considerable way from the curtilage of Museum Street and the pavement area is dominated, particularly at the corner with High Holborn, by a series of London Plane trees running up Museum Street to West Central Street, most having large crowns, and a further four plane trees along High Holborn, two of which are of significant quality. (Reference Tim Moya Associates (TMA) "Arboricultural Impact Assessment of Selkirk House Development (June 2023).

8.4.1.2 It is proposed to cut down **ten** trees and replace the same number, notably the most mature and the most significant, located on the High Holborn frontage. These two trees (T1 and T2) are required to be felled in order to facilitate the demolition of Selkirk House, to allow for piling drilling rigs and future servicing facilities for the tower block. TMA states in paragraph 6.3

"Of these four specified removals, it is the loss of T1 (a *Category B* early-mature London plane tree) that is most noteworthy. This specimen is a prominent feature of the public realm, which means that its loss will have an adverse impact upon the character of the public realm and how it is perceived."

8.4.1.3 The GLA London Plan States in Section 7 Greening Infrastructure and Natural Environment in Policy G7.C titled Trees and Woodlands, states:

- Development proposals should ensure that, wherever possible, existing trees of value are retained. (Category B and lesser trees apply)

8.4.1.4 It goes on to say that if planning permission is granted the developers should provide a replacement. But the important point is that Camden Council should ensure where possible existing mature trees of value are retained.

8.4.1.5 In addition, the London Plan states in para 8.7.1:

Trees and woodlands play an important role within the urban environment. They help to trap air pollutants, add to amenity, provide shading, absorb rainwater and filter noise. They also provide extensive areas of habitat for wildlife, especially mature trees.

8.4.1.6 Camden's Design Planning Guidance states in para 4.20

- Urban spaces have particular character which results from a combination of factors including geology, ecology, topography, architectural design and the history of their development and use. The Council will expect new landscape design to respond to, preserve and enhance local character, through the:

- o preservation of existing trees and hedges.

8.4.1.7 Clearly the proposed felling of 10 trees is not policy compliant with this primary objective of retaining existing particularly mature trees.

8.4.1.8 Camden Local Plan calls for developments to be sustainable and Section CC1 has a large section discussing climate change and the need to take steps to mitigate climate change.

8.4.1.9 Clearly cutting down 10 mature and semi mature trees is not a green approach, especially as the need to cut down these, particularly the mature trees that have taken over 60 years to grow to their current size, only arises as a consequence of the choice to demolish Selkirk House and construct a taller tower block.

8.4.1.10 There is no mention in the developer's reports as to the ecological dis-benefits of their proposals and clearly the extent of tree felling is a very considerable dis-benefit. That new trees will be planted in replacement does not mitigate the environmental damage caused and clearly the maturity of the replacement trees will not match those that are being felled. In addition, the urban landscape will be adversely affected by the loss of the mature trees and the benefits of mature trees described in the London Plan para 8.7.1 above.

8.4.1.11 It is telling that Camden's planners have not required the developers to retain the mature trees T1 and T2; rather they have apparently agreed to their felling, subject to replacement, ignoring the Council's primary planning objective of the preservation of existing trees. It is all too evident that developers are forcing the mature trees to be felled as a consequence of their design, not as Planning Policy requires, that the design should start with the default obligation that all mature trees should be retained.

8.4.1.12 The current public realm area directly in front of Selkirk House is approximately 560 sqm. As a consequence of the new office tower being pushed forward, approximately 58sq m of open area will be lost. The developers claim (and it appears Camden planners are of the same opinion which is most strange), that the arcade at street level is public realm space when clearly it is private space, personal to the office block, especially as it contains a flight of steps up to the entrance of the office block. This represents 10% decrease in the public realm in the most important location and will have many negative consequences. The width of the pavement at the north end is only 2.5-3m due to the taxi drop-off point and the planters around the trees. This bottleneck, which is about 14m in length, is likely to be compounded by the negative effect of cycle deliveries and it is likely that pedestrians will be obliged to walk in the street!

8.4.1.13 The north-south route from the British Museum to Covent Garden is along Museum Street. In the section of Museum Street between West Central Street and High Holborn, the street scene will be extraordinarily boring and inactive; on one side there is already the vast private entrance lobby to the Post House office development and directly opposite will be the equally private and dominating office foyer entrance to the proposed new office tower. This juxtaposition of two soulless office foyers and the reduction of the public domain will clearly not make for an active street frontage, as required in Camden's Local Plan (see Camden Plan D1(f)).

8.4.1.15 The fact that 85% of the Museum Street frontage between West Central Street and High Holborn will be given over to private entrance lobbies to the office blocks on either side of the road, is not in accordance with Policy D1(f). The Local Plan states under the heading Street Frontages and Legibility in para 7.11

- Building facades should be designed to provide active frontages and respond positively to the street. Active frontages are building facades that allow people on the street to see inside the building. A more active type of frontage is one where the use opens out to the street, like a shop with a window display and entrance, or a use like a café or restaurant with outdoor dining. Active

frontages add interest and vitality to public spaces.... Positive factors for frontages are entrances, shop fronts and windows. *Negative factors include long blank facades*, high boundary walls, solid roller shutters and service entrances and yards.

8.4.1.16 What both the Post House and the proposed tower block have in common are ground floor entrance lobbies that are long blank facades that deliberately show off and actively reject anyone walking in off the street. The foyers say 'this is a private area for those with privilege and it is not for the general public'. They are blank facades that exclude rather than invite and deaden rather than enliven the street scene.

8.4.1.17 The Council say they wish that the wide pavement in Museum Street should be 'greened' and take the opportunity to significantly improve the public realm in this location because Museum Street is the main route to the British Museum and to Covent Garden.

8.4.1.18 This is set out in Camden's Opportunity Area site description HCG3 paragraph 7.30t states the development must:

- Maximise opportunities for high-quality urban greening, in particular along the wide pavement on Museum Street

8.4.1.19 In this context the fact that the public realm has been, reduced and the pavement will not be as wide, as a consequence of the proposed office tower being much closer to Museum Street, shows that the proposals clearly do not meet this requirement and will have the following negative effects:

- will significantly reduce the available space for the public realm from what currently exists with a consequential reduction of the free pedestrian area; this will be further reduced as a consequence of the four planters with integral seating that are proposed to encircle the retained trees. It is very likely that pedestrians will be obliged to walk in the road especially outside the entrance of the office tower block.
- will make the pavement area much darker as the two tall buildings will be significantly closer. The section of Museum Street alongside the two tower blocks will appear like a chasm; on one side an office tower 74m high and on the other an office block circa 50m high, with a narrow pavement on both sides of Museum Street and in-between a one-way very busy traffic route.
- will militate towards an unpleasant micro-climate due to the wind tunnel effect of the two tower blocks being so close together and because of the permanent shadow that the towers cause.
- The conflict between pedestrian movement and vehicular movement will be much more pronounced especially as taxi and service drop-off points will be required along the length of Museum Street to service both tower blocks. Some allowance has been made for Uber-like food delivery cycle provision mirroring the deficiency on the east side of Museum Street in front of the Post House, where delivery cycles often block the pavement. As the available space has been reduced, the taxi set-down points and Uber cycle-parking area (that will be required), will bite into the available public realm area, and the conflicts with pedestrian movement will be much worse than at present. However much greening is suggested with planters, the inherent problems will remain unresolved, and the free flow of pedestrians along Museum Street will be seriously impeded.
- The existing trees that are being retained have significant crowns and will further reduce the daylight along Museum Street. The consequence is that there will not be a significant public realm improvement, indeed the proposed development and siting of the tower block will substantially reduce the quality of the public realm in the location most needing improvement.

8.4.1.20 Camden's Design Guide Heading 4 Landscape and the Public Realm has as its key message:

- High quality public realm must be inclusive and accessible and contribute to supporting and improving the character and quality of the borough's environment.

The public realm proposals along Museum Street will not meet this very basic planning objective.

8.4.2 Public Realm: High Holborn in front of the tower block

8.4.2.1 Turning to the proposals for the High Holborn pavement area, the felling of the two mature London Plane trees, both of which are of a size to warrant protection under existing planning policy, but are in fact to be felled, and the existing clear pedestrian route will be interrupted by a substantial pavement lorry 'cross over' to the proposed office tower service area.

8.4.2.2 Camden Local Plan, Chapter heading Biodiversity states as Policy A3:

- The Council will protect, and seek to secure additional, trees and vegetation. We will:
- resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation.

8.4.2.3 Clearly there is something fundamentally wrong, when the most precious existing green features on the site - two very mature trees- are to be felled in order to facilitate the extremely climate damaging demolition of the tower block. When considering sustainability this approach is a double whammy; first to design a building that requires the felling of two mature sound trees and then the reason given that it is necessary in order to facilitate the demolition of a building that should and could be retrofitted, and in the future to allow for the servicing cross over to the tower block service bay. The false logic is even harder to justify when Camden's greening policy is to preserve and protect mature sound trees, in this case trees that are 50/60 years old and are of particular local importance. (See London Plan policy G7.3; Camden Planning Guidance 4.2, Camden Local Plan Biodiversity A3 (j), and clearly failing to protect important existing public amenity (Planning Guidance para 6.13)

8.4.3 Public Realm: West Central Street

8.4.3.1 The public realm 'improvements' along West Central Street will be similarly undermined by the height and bulk of the proposed tower block on the south side and the inappropriate height and bulk and design of the new residential block that will be up to five-storeys high on the north side. Like Vine Lane and Museum Street, West Central Street will be an extremely dark road, enjoying minimal sunlight and with completely dead street facades on either side of the road.

8.4.3.2 On the north side of West Central Street over 60% of the street frontage will be dead, with doors leading to residential service areas (bin storage), an electrical substation and a staircase leading to the proposed housing access deck at first floor level. The remainder will be given over to shops/office flexible use. The south side of the road, which is only 6 m wide, will have a potentially more animated street with a cafe proposed along its length, but the pavement area will be entirely given over to cycle racks that will make it impossible to walk along the pavement, and will result in pedestrians having to walk in the road or on the north side pavement which is exceedingly narrow (some 2.8m wide). There is no proposed greening or tree planting and the street will be hard surfaced throughout.

8.4.3.3 Due to the height of the office block on the south side and the height of the proposed residential block along the north side of West Central Street, the sunlight penetration will be minimal and the street for almost all of the year will be in shadow.

8.4.3.4 While the materials proposed for the public realm (road and pavement) will be superior to the existing, the public gain is minimal as the developers would undertake this work anyhow as a consequence of destroying the existing finishes during the demolition and construction of the office tower block.

8.4.3.5 The public realm along West Central Street as a consequence of the development will be considerably worsened because:

- i. The street will be in shadow almost continuously and will have minimal sunlight penetration whereas the height of Selkirk House on the south side and the two-storey height of the properties on the north side of the street allow for reasonable sunlight penetration and considerably less overshadowing.
- ii. The pavement areas will be substantially reduced as the south pavement is to be given over to cycle hoops.
- iii. The staircase leading to the housing access deck at first floor level on the north side of the street is an invitation for anti-social and criminal behaviour. It is a given fact that entry to residential accommodation is best when the entrance is not shared and has direct access to the street.

8.4.3.6 In summary, the suggestion that the improvements to the public realm will offset the damage to nationally important heritage and to the conservation areas included within the development site and surrounding the block, is untenable because:

- The planning requirement is first to provide new public open space commensurate with the size of the development, but none has been included let alone considered in the proposals.
- Fails to provide public play space for children particularly for the age group 0-4 years old.
- The purported public realm improvements consist of a new cut through called Vine Lane that fails to meet a host of planning requirements and will be a most unwholesome element of the scheme that actually designs in the likelihood of criminal and anti-social behaviour.
- The public realm proposals for Museum Street suffer by the fact that the area of the public realm has been substantially reduced as a consequence of the proposed office tower building line being brought considerably closer to the Post House office development opposite that will produce a most unpleasant microclimate and due to the planters, steps up to the office entrance, and the taxi set-down point there will be pinch points in the available space for pedestrians where the pavement area is only 2m wide along an 8 m length.
- The Museum Street public realm proposals fail to cater for the plethora of cycle and motor bike deliveries that already occur to the Post House and is likely to grow considerably with the proposed office tower block.
- The proposals fail to meet Camden's biodiversity policies by the fact that ten trees are required as a consequence of the development to be felled, two of which are high quality and any replacement will take at least 60 years to equal the quality of the best of the trees that are to be felled.
- The public realm proposals for High Holborn will seriously reduce the existing public realm quality of the street by introducing a large lorry cross-over and by the felling of the two highly mature trees.

8.5 Private Open Space for Residential Accommodation

8.5.1 This is discussed in detail within the comments on Housing but as the developers have lumped private open space attached to the housing element of the development in with their Public Open Space and Public Realm description, the basic facts are discussed here.

8.5.2 The relevant policies that apply when considering the private open space for the housing accommodation are set out in the GLA's Housing Design Standards (June 2023)

Policy C.4.2 states

- The location of the main living and eating spaces, *and the main private outside space*, should be optimised to make the most of the best views and the orientation. These spaces should receive *direct sunlight* (south-facing is preferable, provided that appropriate shading devices are incorporated) and enjoy reasonable privacy through the careful placement of windows, balcony design or other measures

Policy C.10.1 states

- Provide a minimum of one 5m² of step-free private outside space for homes with one or two bedspaces, with a minimum depth and width of 1.5m. An extra 1m² should be provided for every additional bedspace.

8.5.3 Only 8 of the 44 dwellings proposed will comply with the required area of private open space for each dwelling and the level of daylight and sunlight penetration that is required. The six dwellings that do comply are all designated as private/market housing located at the top end on the west side of West Central Street (the current vacant site).

8.5.4 The remaining 38 dwellings will have exceedingly poor daylight penetration, some so bad that they score zero daylight penetration as measured by BRE standards, and none receive direct sunlight. Nine dwellings, of which three are for large families, have no private open space. The worst daylight and sunlight penetration conditions apply to the designated social and affordable dwellings.

8.5.5 Private communal space is provided for nineteen of the private/market housing but none for the affordable/social rented accommodation as the access deck at first floor level is firstly inadequate in size and does not comply with any of the daylight and sunlight GLA housing standards requirements.

8.6 Summary

8.6.1 The proposals fail to meet a host of planning policies contained in GLA's The London Plan, The GLA's Housing Design Standards, The Camden Local Plan, Camden's Supplementary Open Space and Amenity planning guidance and Camden's Opportunity Areas emerging proposals.

GLA The London Plan Policies D1, D3, D6, D9, G7, S4, S14, paragraph 8.71

The GLA Housing Design Standards, Policies A1.4, A1.7, A1.8, B9.5

The GLA Play Supplementary Planning Guidance para 4.7

Camden Local Plan, Policy Growth G1 para 2.29, Policy A2, paras 1.7, 1.8, 1.9, 1.12, Policy A.3(j) Map 2, Open Space para 6.31, Policy D1, Policy D2, para 2.3

Camden Public Open Space, Supplementary Planning Guidance: 1.23, 1.24, 1.27, 1.40, 1.60
Appendix D 6

Camden Amenity, Supplementary Planning Guidance: Policy 2, Policy 3, Policy 6, para 6.13
Camden Landscaping, Supplementary Planning Guidance Heading 4, 4.20, 4.21 4.62,
Camden Site Allocations emerging proposals. 2013 version and 2022 version subsection HCG3,
Draft Camden Site Allocations Local Plan summary of comments para 7.30