

From: Bloomsbury Association
Sent: 11 October 2023 15:28
To: Planning
Cc: David Fowler; Chair Association
Subject: APPLICATION FOR PLANNING PERMISSION 2023/2510/P & 2023/2653/L - 1 MUSEUM STREET

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

Save Museum Street is 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 and Willoughby Street Residents

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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, dated 28 March 2023	●
10	E-mail from Camden Conservation Officer, dated 18 August 2023	●
11	E-mail from Chief Executive, Historic England, dated 7 September 2023	●

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

POLICY NON-COMPLIANCE

A summary of the major policy failures of this proposal which are more fully detailed elsewhere in this document

15.1 NATIONAL PLANNING POLICY FRAMEWORK

15.1.1 Chapter 2 Achieving Sustainable Development Paragraph 8 - protect and enhance our historic environment; make effective use of land; protect biodiversity; reduce CO₂ emissions by retrofitting rather than redevelopment. - **FAILS to comply**

15.1.2 Chapter 16 Conserving and Enhancing the Historic Environment Paragraphs 199, 200, 201 and 202 – weight to be given to conservation; harm to the significance and setting of listed buildings and to the character of the Bloomsbury Conservation Area. To comply, it must be shown that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm, or that four additional tests concerning the use of the site or charitable ownership are not otherwise achievable. **These have not been provided.** Even if the scheme is considered to cause less than substantial harm, the compelling evidence presented by SMS and others demonstrates that the public benefits of the proposal would not outweigh that harm. **FAILS to comply**

15.1.3 Chapter 8, Paragraph 98 - providing adequate open space - **FAILS to comply**

15.1.4 Chapter 14, Paragraph 152 - strong presumption in favour of repurposing and reusing buildings; support the transition to a low carbon future; radical reductions in greenhouse gas emissions; reuse of existing resources, including the conversion of existing buildings.' - **FAILS to comply**

15.2 GREATER LONDON ASSEMBLY: THE GREATER LONDON PLAN 2021

15.2.1 Policy SI2, Minimising Greenhouse Gas Emissions, Item 3.3, Table 2 - Before embarking on the design of a new structure or building, the retrofit or reuse of any existing built structures, in part or as a whole, should be a priority consideration as this is typically the lowest carbon option. Significant retention and reuse of structures also reduces construction costs and can contribute to a smoother planning process - **FAILS to comply**

15.2.3 Policy D3 - enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, provide active frontages, deliver appropriate outlook, privacy and amenity, or provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity - **FAILS to comply**

15.2.4 Policy D4 F 1 – no consistency in design. Abrupt change July 2022, in response to public outcry as to its height. Height reduced; bulk increased dramatically to maintain floor area. Abrupt change June 2023 when 5 buildings on site listed. In each case the design solutions have been reactive, with the aim of propping up a failed scheme. **FAILS to comply**

15.2.5 Policy D6 Housing quality and standards – housing should be high-quality; maximise dual aspect dwellings; sufficient daylight and sunlight; provision of private outside space; provision of communal open space and children's play space. - **FAILS to comply**

15.2.6 Policy D9 Tall Buildings – location; engagement with neighbouring boroughs, visual impact; heritage impact; service management; environmental impact; cumulative impact; public access. - **FAILS to comply**

Additionally, no evidence presented to justify increase in height and footprint of Selkirk House which will be harmful to heritage assets; failure to demonstrate that alternatives have been explored and considered - **FAILS to comply**

15.2.7 Chapter 7 Heritage HC1 - 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 - **FAILS to comply**

15.2.8 Chapter 8 Green Infrastructure - Policy G4 B Open Space - promote creation of new areas of publicly-accessible open space; ensure that open space, particularly green space, included as part of development remains publicly accessible; Development proposals should: 1) not result in the loss of protected open space, 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency - **FAILS to comply**

15.2.9 Play Supplementary Planning Guidance para 2.2.16 – new housing development that ‘generates’ more than 10 children must provide suitable play space
GLA Policy S4 - 10 sqm play area per child – **FAILS to comply**

15.2.10 Policy GG1 - early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies. **FAILS to comply**

15.2.11 Policy HC1 Heritage Conservation and Growth **FAILS to comply** as it would cause harm to the significance and setting of heritage assets.

15.2.12 Policy HC4 Strategic and Local Views **FAILS to comply** in the case of LVMF strategic views 18B.2, which would be impacted, and there are several local views where the increased height of Selkirk House would cause harm.

15.2.13 Policy G5 Urban Greening - major development proposals should.....[include] urban greening as a fundamental element of site and building design - **FAILS to comply**

15.2.14 Policy G7 B C Trees and Woodland - development proposals should ensure that, wherever possible, existing trees of value are retained – 10 trees are to be removed of which two are of particular high quality, being substantial (50+ years), prominent and in good condition, only to facilitate the demolition of the existing building - **FAILS to comply**

15.2.15 Policy SI2 requires, ‘retrofit or reuse prioritised and should be considered before new build’ - **FAILS to comply**

15.2.16 Policy SI7 states ‘retaining existing built structures totally or partially should be prioritised before considering substantial demolition..’ **FAILS to comply**

15.2.17 Policy S4 Play and Informal Recreation – **FAILS to comply**

15.2.18 Policy T7 Deliveries, servicing and construction – proposed delivery facilities do not have capacity to handle the number of deliveries that will be generated this will have a significant negative impact on the surrounding area with congestion and lorries idling - **FAILS to comply**

15.2.19 GLA Housing Design Standards, Policies A1.4, A1.7, A1.8, B9.5, C4.2, C10.1– Height and massing; optimising orientation; maximising daylight; utilising and controlling solar gain; impact of new development on the level of daylight and sunlight received by the existing residents in surrounding homes; maximise the quality and availability of daylight and

sunlight in communal outside spaces - spaces designed for frequent use (including sitting and play spaces) [should] receive direct sunlight through the day; amount of private outside space; - **FAILS to comply**

15.2.20 The GLA's Housing Supplementary Planning policy (see 3.4.2) – protection for HMOs - **FAILS to comply**

15.3 CAMDEN LOCAL PLAN

15.3.1 Policy CC1 Climate Change Mitigation – requires developers to demonstrate that it is not possible to retain and improve the existing building - **FAILS to comply**.

15.3.2 Policy D1 Design requires that development respects local context and character; preserves or enhances the historic environment and heritage assets - **FAILS to comply**

15.3.3 Policy D1(f) Street Frontages and Legibility in para 7.11 - building facades should be designed to provide active frontages and respond positively to the street - **FAILS to comply**

15.3.4 Policy D1 Tall buildings policy - relationship to surroundings (streetscape and skyline; historic context of surroundings; relationship between the building and views; degree to which the building overshadows public spaces - **FAILS to comply**

15.3.5 Policy D2 Heritage - sustainable in design and construction; best practice in resource management and climate change mitigation and adaptation; comprises details and materials that are of high quality and complement the local character; and integrates well with the surrounding streets and open spaces - **FAILS to comply**

15.3.6 Policy D2 Heritage – FAILS to comply as there will be substantial harm to a designated heritage asset, including conservation areas and Listed Buildings; the SMS representation, demonstrates that the harm that would be caused by the proposed scheme is not justified, nor outweighed by any public benefits.

15.3.7 Policy D2 Heritage para 7.49 Demolition in conservation areas - general presumption in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area, listed or not, to preserve character and appearance. The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention - **FAILS to comply**

15.3.8 Camden Supplementary Planning Document: Design (SPD)

This document is an additional “material consideration” in planning decisions.

The development **FAILS to comply** with the SPG in the following respects:

- a. ***Demolition in conservation areas*** - the Council will not normally allow demolition of a building in a conservation area without substantial justification, in accordance with **NPPF paragraphs 195-196 and 201**.
- b. ***Alterations to listed buildings*** - statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses; impact of proposals on the historic significance of the building, including its features, such as original

and historic materials and architectural features; original layout of rooms; structural integrity; and character and appearance

- c. **Preventing harm to heritage assets** - Council **will not permit** development that results in harm that is less than substantial to the significance of a designated heritage asset unless the benefits of the proposal outweigh that harm.
- d. **Consideration of cumulative impact** - The Council will, in addition to considering proposals on an individual basis, also consider whether changes could **cumulatively cause harm** to the overall heritage value and/or integrity of the relevant Conservation Area, Listed building or heritage asset.
- e. **Integrating new development with heritage assets** - development expected to conserve and avoid harm, also to take opportunities to enhance or better reveal the significance of heritage assets and their settings. Development must respect local character and context and seek to enhance the character of an area where possible.

15.3.9 Policy H4 Maximising the supply of Affordable Housing

Policy H2 Quantity of Housing provided as a consequence of the commercial floorspace uplift - FAILS to comply

15.3.10 Policy H10 Housing with Shared Facilities - protection for HMO accommodation - **FAILS to comply**

15.3.11 Policy A2 New Public Open Space in areas where there is a clear deficiency, including in the Central Area, is to be provided - **FAILS to comply**

15.3.12 Policy T4 Sustainable Movement of Goods and Materials – arrangements for accommodating goods vehicles on site are inadequate; off-street collection areas for waste – **FAILS to comply**

15.3.13 Camden's Design Planning Guidance, 6 Landscape Design and Trees – preservation of existing trees and hedges - **FAILS to comply**

15.3.14 Camden Amenity, Supplementary Planning Guidance: Policy 2, Policy 3, Policy 6, para 6.13 – Distance between buildings; overlooking privacy and outlook; daylight and sunlight; noise and vibration - **FAILS to comply**

15.3.15 Building Research Establishment (BRE) Recommended Good Practice - Daylight and Sunlight in buildings; open amenity spaces should be able to enjoy: "a minimum of 2 hours of full sunlight over 50% of their area on 21st March" - **FAILS to comply**

15.3.16 Camden Statement of Community Involvement Para 3.10 – expects a suitable consultation process - **FAILS to comply**

Further Planning considerations

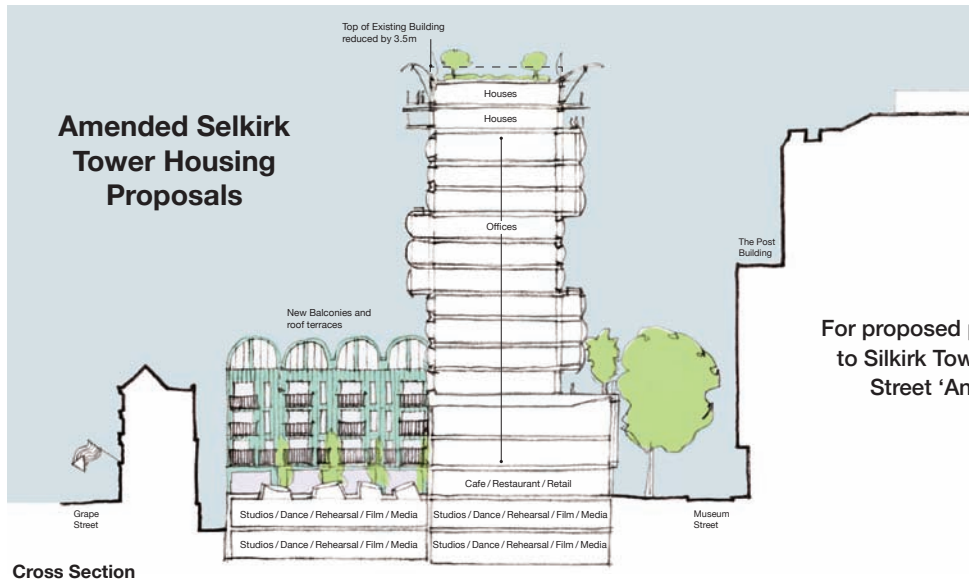
London Borough of Camden Draft Site Allocations Plan (2020)- Opportunity Site

HGC3. The consultation process has revealed an overwhelmingly negative response to the proposal that a taller building is acceptable, that Selkirk House should be demolished rather than retrofitted in accordance with the Council's sustainability Policies and that a cut through from West Central Street to High Holborn is beneficial. The developers are using this draft

as justification for their development whereas the results of the consultation should guide what the Council does. To date Camden have failed to report the results of the consultation formally to the planning committee.

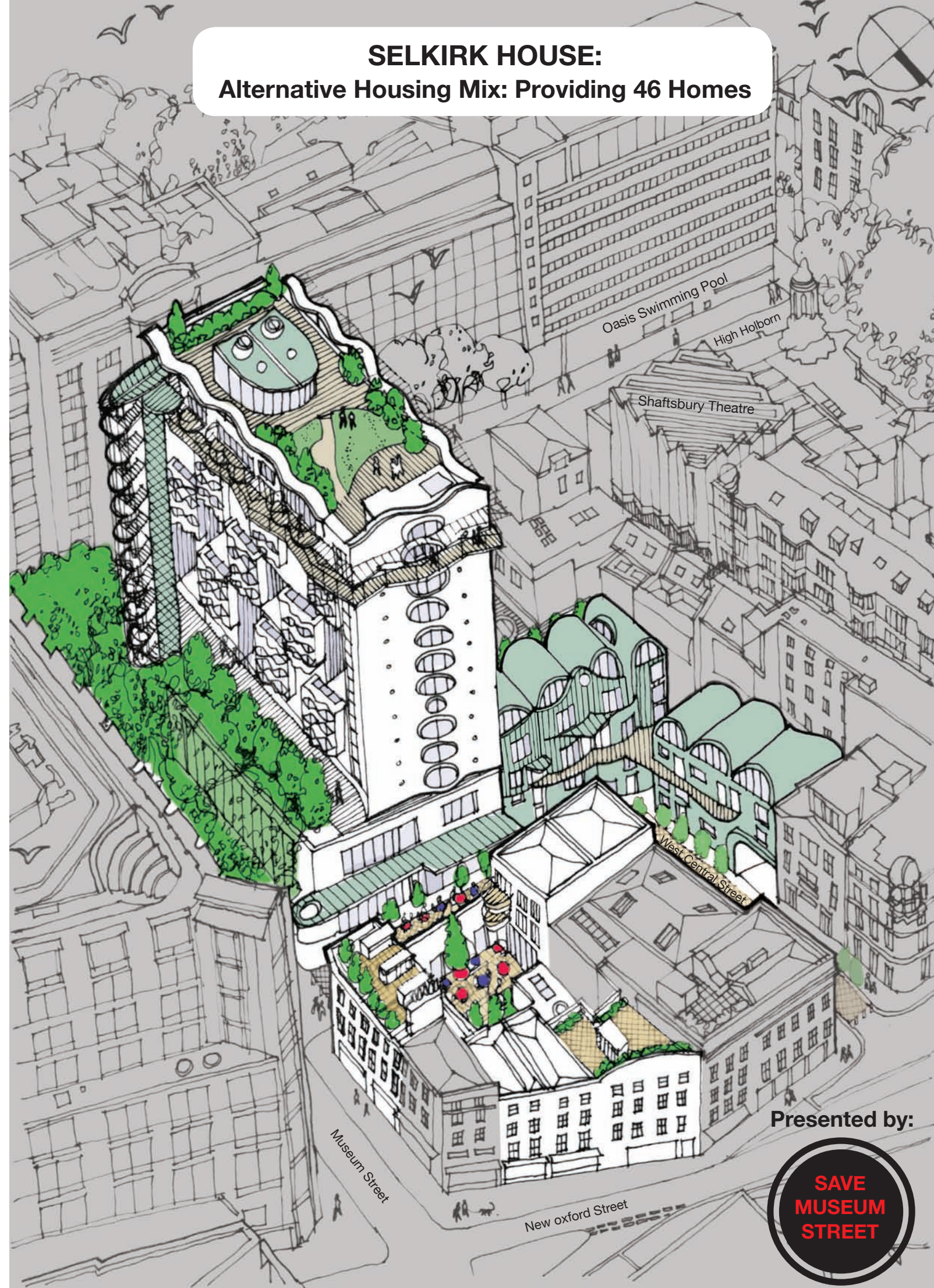
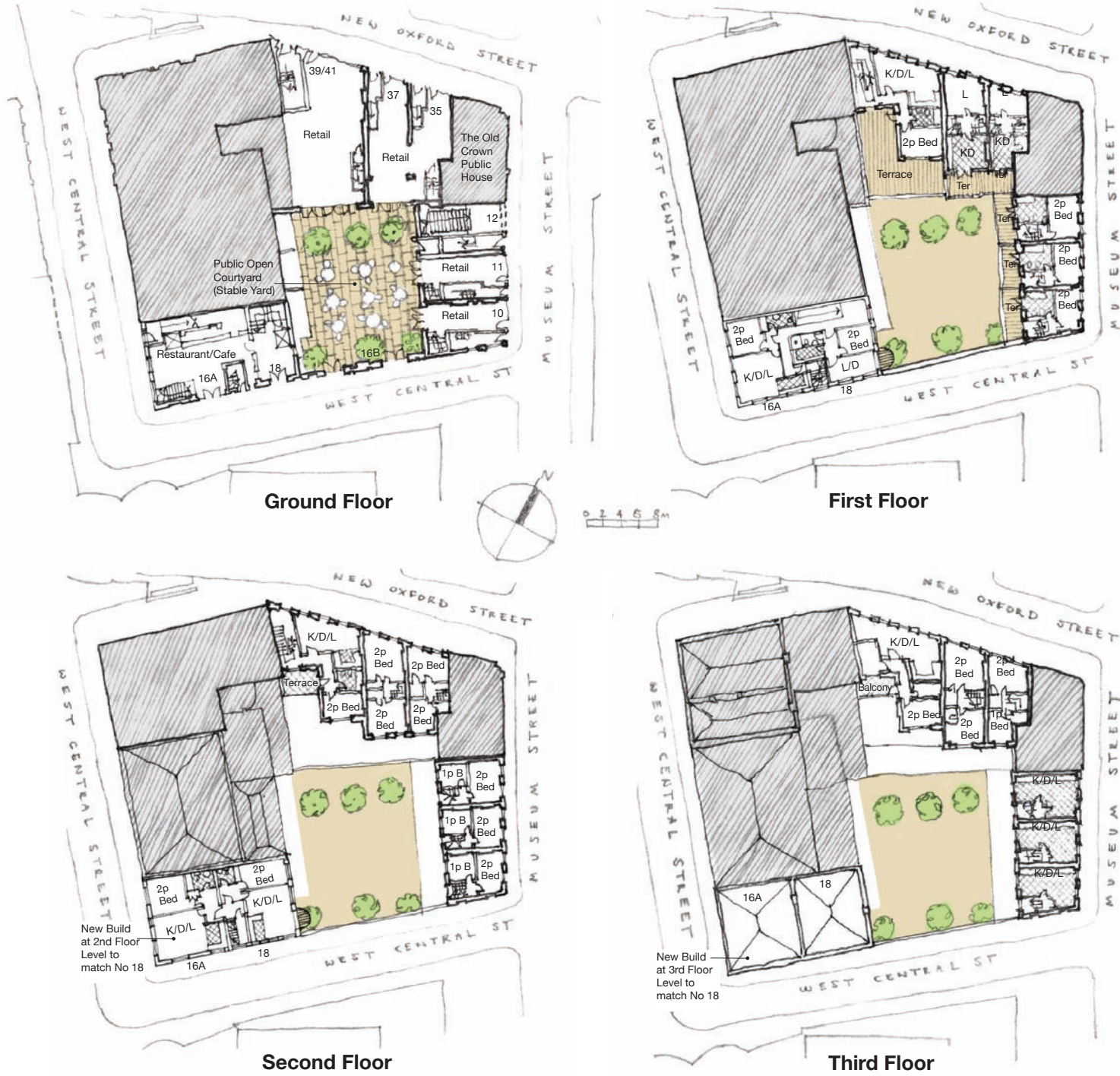
Historic England - Conserving Georgian and Victorian Terraced Houses: A guide to managing change July 2020. This is a supplementary planning document therefore a planning consideration.

Historic England published this document, *"to help local authorities and others implementing historic environment legislation and policy."* It states *"If there are plans to change the plan form, issues to consider include, but are not exclusive to, the following eleven items...."* (see page 13). The proposals to the listed buildings 10,11 and 12 Museum **fail to comply with all eleven points.**



For proposed plans of 14th & 15th floor maisonettes to Silkirk Tower refer to page 15 of Save Museum Street 'An Alternative Proposal' document.

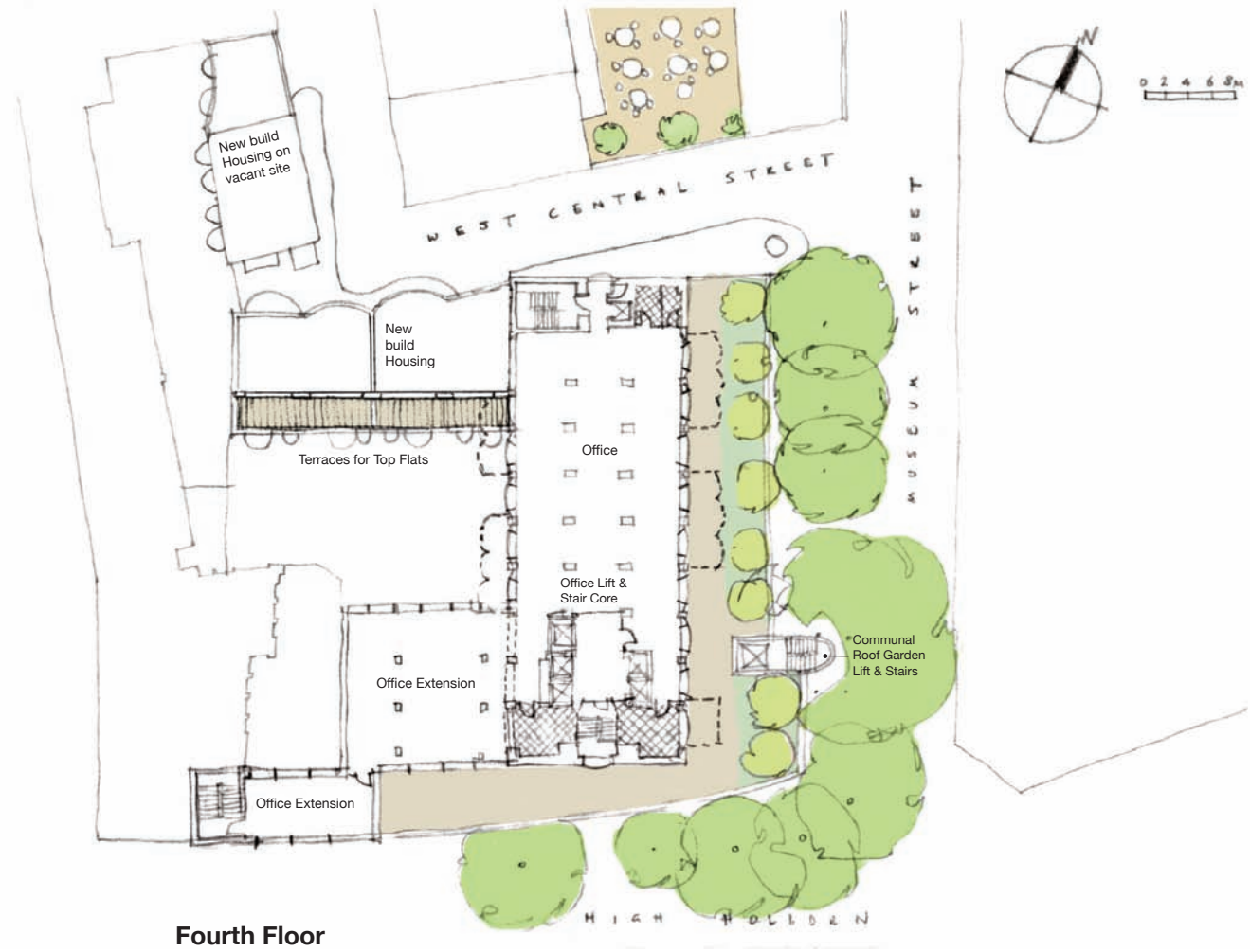
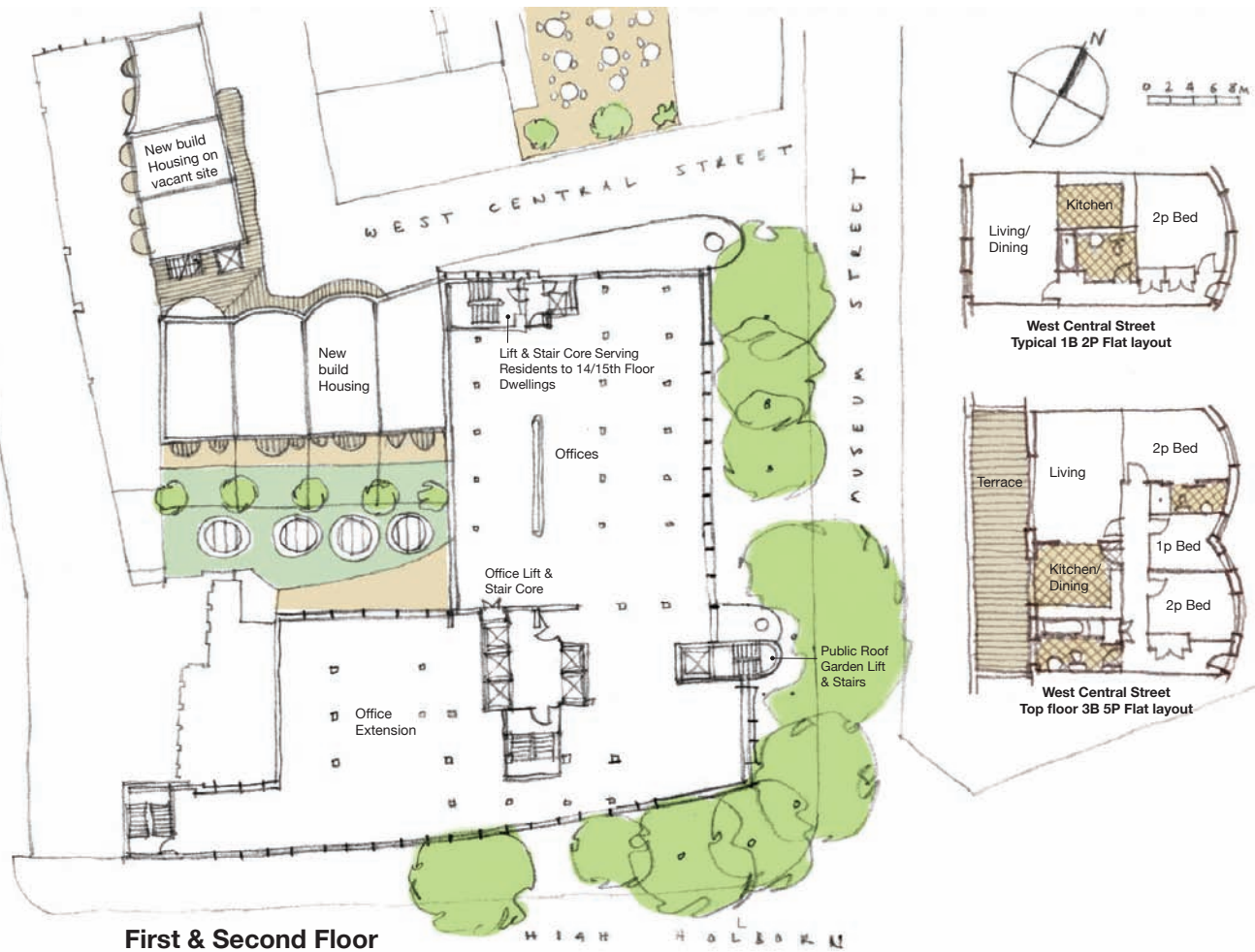
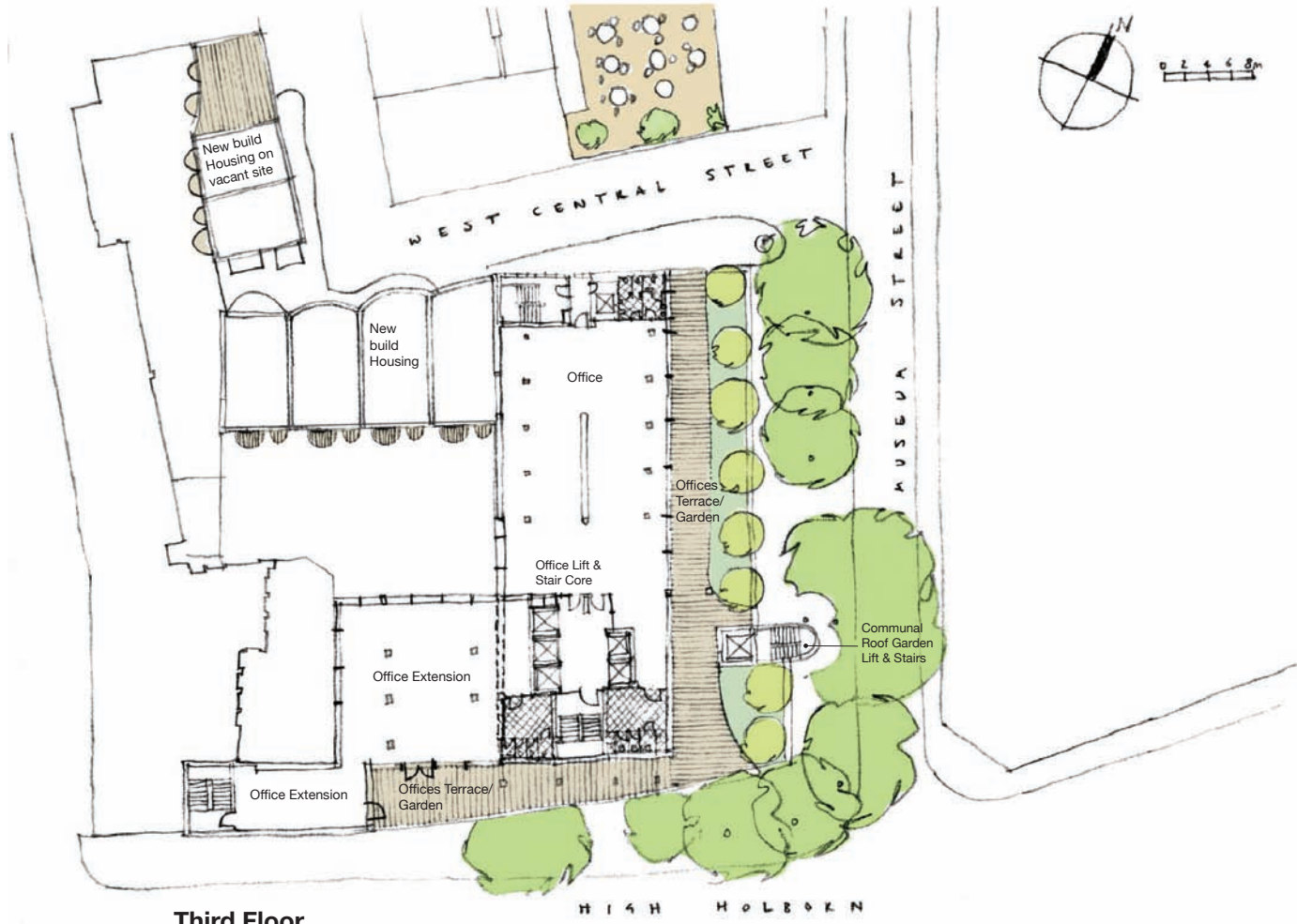
Amended West Central & New Oxford Street Housing Proposals



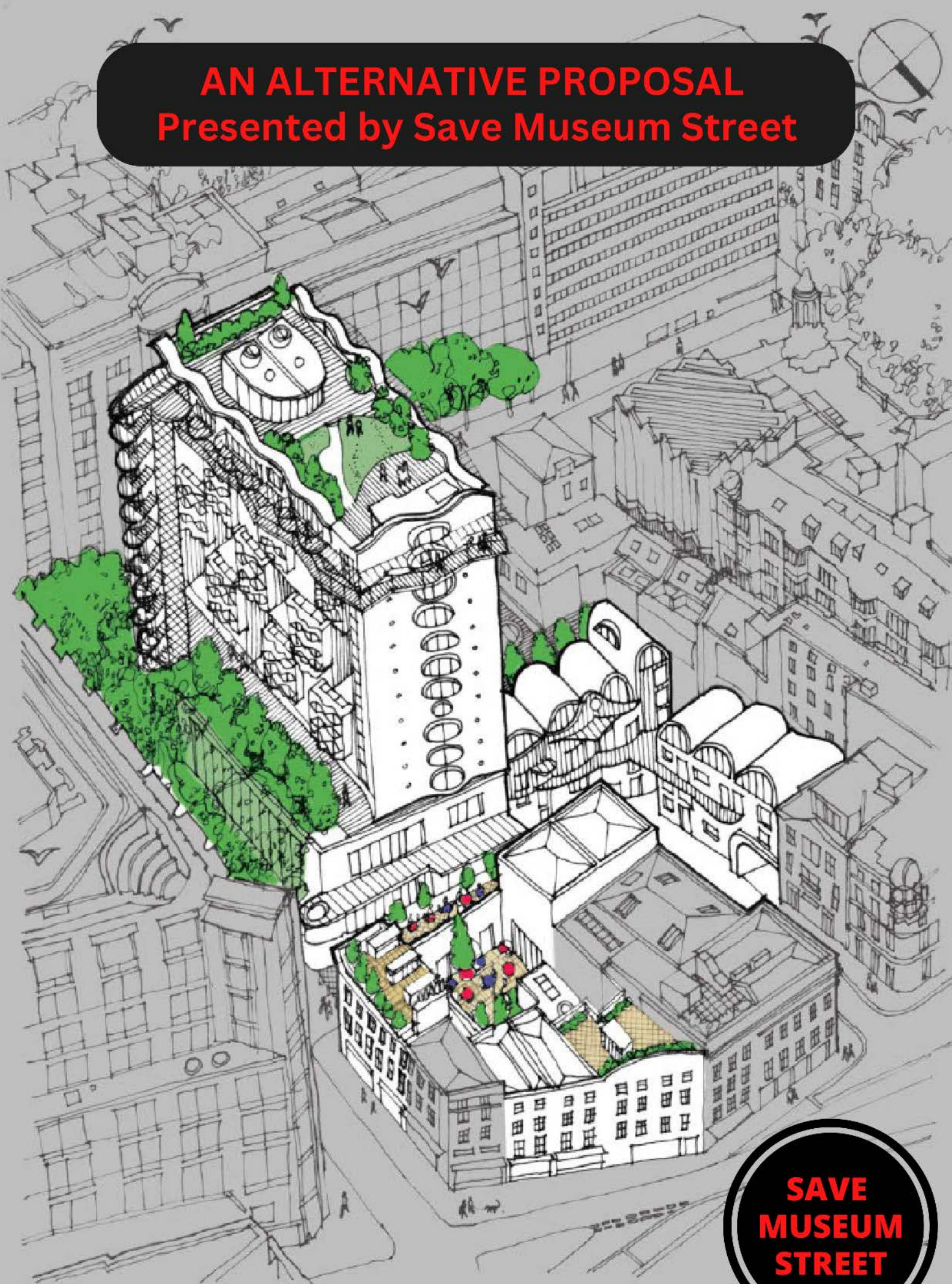
Amended Selkirk Tower Housing Proposals



For proposed plans of 14th & 15th floor maisonettes to Silkirk Tower refer to page 15 of Save Museum Street 'An Alternative Proposal' document.



AN ALTERNATIVE PROPOSAL
Presented by Save Museum Street



**SAVE
MUSEUM
STREET**

Executive Summary

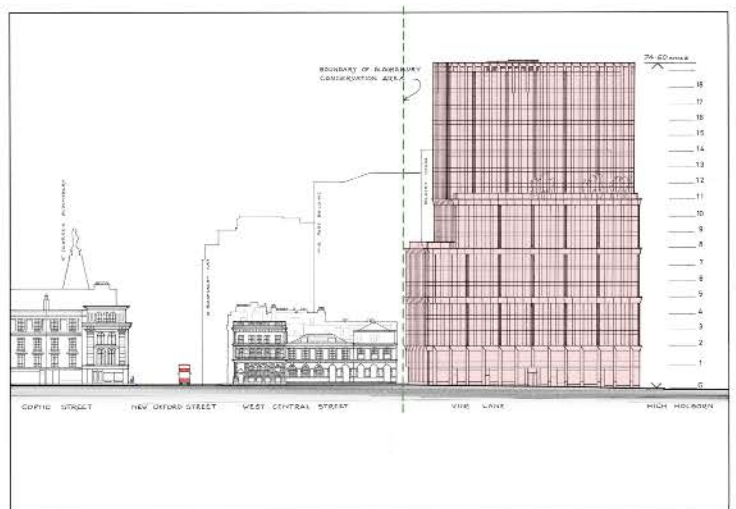
Fifteen local amenity groups and the largest local landowner, Bedford Estates have united as the Save Museum Street Campaign in opposition to an avaricious commercial development between Bloomsbury and Covent Garden.

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

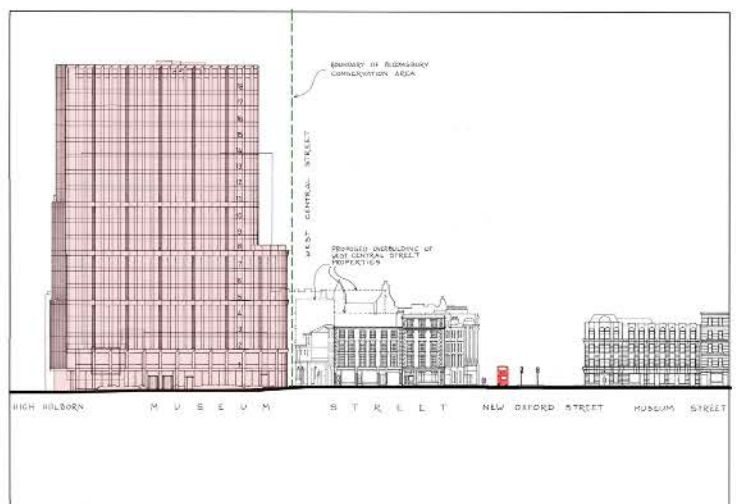
- Bloomsbury Association
- The Bedford Estates
- Covent Garden Community Association
- Camden Climate Emergency
- Covent Garden Area Trust
- Grape Street Residents
- South Bloomsbury Tenants & Residents' Association
- Goldsmith Court Residents
- Bloomsbury Residents' Action Group
- Leicester Square Association
- Tavistock Chambers Residents' Association
- Charlotte Street Association
- Willoughby Street Residents' Association
- The Soho Society
- Charlotte Street Association
- Dudley House Tenants' Association

Developers' scheme will:

- Demolish Selkirk House (the former Travelodge hotel), a sound and perfectly reusable structure
- Build a taller and bulkier tower in its place damaging the daylight into adjoining buildings and adversely affecting views throughout London, including from the British Museum and Bedford Square and substantially harming the setting of many adjoining listed buildings. It will set a terrible precedent
- Subject the local residents, office workers and students in halls of residence to 75 weeks of demolition disturbance, and to at least 4½ years of construction noise, dirt and traffic
- Create 22,650 sq.m. of office space when most large employers are downsizing when there is over 12½ million sq. m. empty office space available in central London



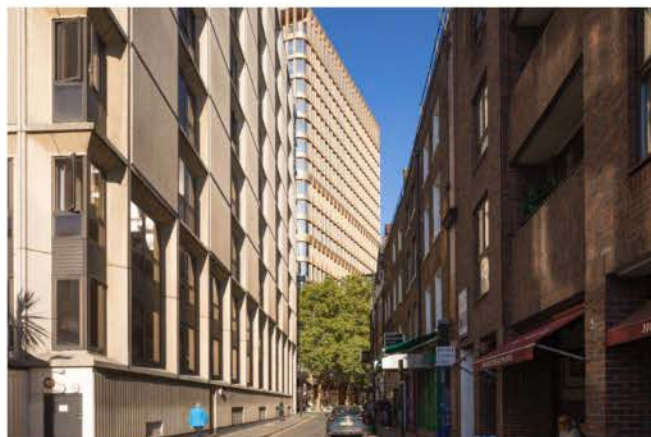
DSDHA architect's drawings showing the height of their proposed scheme beside the existing listed buildings.



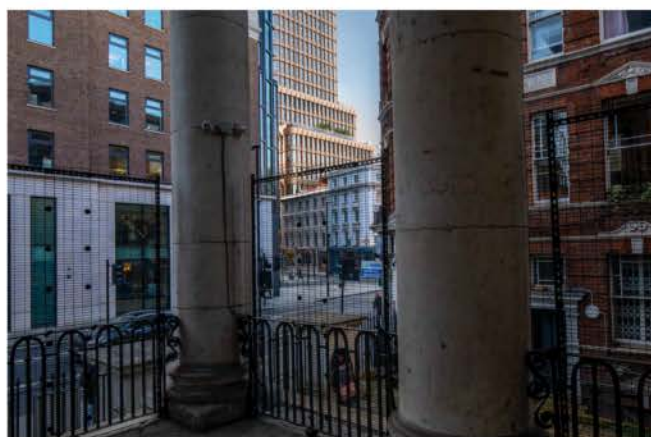
- Demolish buildings with acknowledged architectural merit within the Conservation Area and unsympathetically alter the fabric of listed buildings
- Demolish 27 dwellings
- Build 44 new dwellings, of which only 11 are Social Rent; 8 'affordable', the remaining 25 will be for sale at market rates
- Provide a narrow cut-through to High Holborn (Vine Lane), a pointless thoroughfare that goes nowhere and is only included to increase the commercial floorspace; it damages the historical street layout and is without any historical precedent
- Cram as much of the housing as possible onto the Conservation Area element of the overall development site, regardless of the effect on the listed buildings and the Conservation Area
- Contribute 65,000 tonnes CO2 to climate emissions despite local and national policies insisting on the reduction of emissions, and the retrofitting of existing buildings rather than demolition and new build



The listed Shaftsbury Theatre in the foreground with tower block behind



View from Drury Lane, with the proposed tower blocking the view



View from the grade I listed St. George's Church

Save Museum Street's Alternative Brief and Scheme

We want to show that the developers are presenting us with a false alternative. The choice is not between their scheme and the current state of dereliction, which they have created, there are other ways of developing the site which are preferable aesthetically, socially and economically. The alternative scheme prepared by MBH Architects for the Save Museum Street campaign is just one of many feasible and preferable possibilities.

The scheme will:

- Retain, refurbish and retrofit the existing Selkirk House tower block thereby complying with climate emergency policies of the government, the GLA and Camden.
- Reduce the height by over 3m thereby improving the views across London, lessening the building's impact on neighbouring buildings. The image below shows the existing panels at roof level that could be removed.
- Increase the density without building a taller and grossly bulkier structure.
- Increase the diversity of uses to bring new life and interest into the area (office areas are deserted at night and at the weekend).
- Respect the conservation area, the listed buildings and the historic character of the area.
- Through retrofitting shorten the construction period by at least half and bring the buildings rapidly back into use.
- Open up Stable Yard within the Conservation Area to create a new magnet for visitors to rival Neal's Yard in Covent Garden.
- Car parking and charging facilities for electric cars, cycle storage and changing facilities, distribution hub for local deliveries.
- Provide a publicly accessible roof garden in the heart of the West End of London that will give spectacular views over Central London and be a significant tourist attraction like the Walkie Talkie's roof garden is for the City of London.
- Provide a wide mix of uses to maximise potential. Make available commercial theatre support facilities including rehearsal studios, stage support industries, set design, post production facilities, viewing studios, dance and performance space, film and video viewing suites.
- Support the tourism industry by providing a Tourist Information Centre which would link into the potential of the secret GPO railway that runs directly under the building as a tourist attraction.
- Provide more residential accommodation than proposed by the developers by adding to what already exists; offices or hotel accommodation could be provided within the retrofitted existing tower.
- Retaining the 'brutalist' concrete sculpture that forms part of Selkirk House's Museum Street elevation and is a significant historical marker.

2. Introduction

A large chunk of property mid-way between the Bloomsbury squares to the north and the British Museum and Covent Garden to the south is currently subject to an extensive speculative commercial redevelopment proposal. The developers and landowners are a French-based investment company, BC Partners, which is registered off-shore.

They wish to redevelop a 52m high, 17-storey 1960's office tower, Selkirk House, and replace it with a 74m high, bulky office tower block, almost doubling the total floor area. The development scheme is not limited to Selkirk House but stretches into the Bloomsbury Conservation Area to the north and incorporates many listed properties in Museum Street, New Oxford Street and West Central Street.

The developers have lodged a new planning application with Camden Council, and they are confident that they will receive planning approval from Camden Council by autumn 2023.

In 2021 all the local amenity societies and residents' associations, and the main neighbouring landowner, The Bedford Estates, came together to form the Save Museum Street Coalition (SMS), in opposition to the proposals.

This brochure outlines a précis of what is objectionable in the latest applications and envisages a development brief that would win local support.

In addition, an alternative design approach is illustrated. The purpose is to show that it is commercially and physically possible to give new life to the existing buildings instead of redevelopment. The illustrated scheme is based on the principle of retaining the existing, structurally sound, tower block, restoring the buildings within the conservation area and complying with Camden's design planning policies.

There are many ways this could be achieved. The design scheme enclosed is intended to refute the developers' claim that there is no alternative to their present scheme.



View of proposed tower from New Oxford Street that will overwhelm the listed buildings in the foreground

3. Background and recent history of the development site.

Selkirk House was constructed in 1965. The architect was Nelson Foyle whose brief was to design Trust House Forte's office headquarters including a public car park partially underground. Two floors at the uppermost level of the 54m high block were residential, containing 12 maisonettes. The sculptured concrete mosaic set into the west elevation on the corner of Museum Street is of interest, and as a whole the building is of its time with elements in the prevailing 'Brutalist' style. In 2005 the tower block was crudely re-clad and the offices were converted into a Travelodge hotel.

In 2018/9 the building was purchased by Labtech Ltd, a private company registered in the Isle of Man, solely owned by Teddy Sagi who also owns Camden Lock in Chalk Farm. He terminated Travelodge's lease and the hotel closed in 2020 despite wishing to remain.



Selkirk House in 1966

Labtech commenced discussions with Camden Council's Planning department and the Council encouraged the developers to redevelop Selkirk House and construct a taller building, motivated by CIL contributions and the prospect of new housing on the site. Teddy Sagi appointed DSDHA as his architects but only met them personally once. A planning application was submitted in March 2020 for the total demolition of Selkirk House and much of the block directly to the north up to New Oxford Street. In its place DSDHA/Labtech proposed to build an 80m-high office block, retail units and some housing, including a narrow route cut through from West Central Street to High Holborn which the developers call 'Vine Lane,' despite no historical precedent for this 'cut through'.

The northern section of the site is within the Bloomsbury Conservation Area, considered one of the most important in the UK. In the 1840s James Pennethorne planned the construction of New Oxford Street and as a consequence the buildings bounded by West Central Street, Museum Street and New Oxford Street were, over time refaced or developed in a unified and distinguished manner, with a consistent architectural style that has made the block a coherent whole.

DSDHA's planning application attracted much criticism from all the statutory organisations including Historic England, the Victorian Society and the Georgian Group, and a very negative response from all the local amenity and community organisations. A campaign group, the Save Museum Street coalition (SMS), encompassing all the local organisations, was formed in 2020. Over 250 written objections were submitted to Camden Council.

The major objections concerned the unacceptable height of the office tower; the extent of unnecessary demolition rather than the reuse of the existing structurally sound buildings including Selkirk House; the pitiful social housing content; the unsympathetic treatment of the buildings within the conservation area and the unnecessary creation of Vine Lane.

Revisions to the development were made by the architects and submitted to Camden Council in July 2021. The office tower was reduced in height by 6m but with a much larger floor plate resulting in a grossly bulky tower block; the 'affordable' housing was increased from 12 dwellings to 19, including 9 at social rents and with 29 new apartments for sale.

In June 2021 Teddy Sagi sold the site to a French investment company called BC Partners who appointed Simten as their agents. No changes were made to the scheme and Simten continued to lobby Camden Council to gain planning approval. Save Museum Street has had two meetings with Simten and urged them to reconsider their overall approach to the development but to date with no positive effect, in that Simten are adamant that their speculative office tower block and Vine Lane are not open to discussion.

Due to the intransigence of Simten and the damage their scheme will cause to the conservation area, SMS commissioned Simon Sturgis of the Targeting Zero consultancy to review the sustainability credentials of Simten's proposed office tower. SMS also submitted evidence to Historic England to gain listed protection for some of the buildings in the northern section of the development site within the Conservation Area.

Simon Sturgis has produced three reports for SMS, all of which were damning. He concluded that Selkirk House should be retrofitted, and that the current DSDHA scheme was extremely damaging to the environment, and will hasten climate change. Simten have to date brushed aside Sturgis' fundamental criticisms, insisting that the existing steel-and-concrete tower must be demolished in order to make way for another steel-and-concrete tower, generating huge carbon emissions.

In March 2023, Historic England granted SMS's applications to obtain Grade II protection to 10,11 and 12 Museum Street, 35/37 New Oxford Street and subsequently also to The Old Crown Public House. However, the application to list the horse stable block, 16a/18 West Central Street, with its intact horse ramp and horse stalls on the first floor, was not successful and is now most likely to be demolished and replaced with a completely out-of-character and bulky 6-storey block, unless Camden refuse to grant permission for demolition of a building that they acknowledge gives character to and enhances the conservation area, as stated in their Bloomsbury Conservation Appraisal.

Rather than using the listing as a suitable time to do a thorough reconsideration, their fresh application in late June 2023 repeats all the objectionable elements: they are pressing ahead with the speculative 74m high tower block, retaining the 'cut through', Vine Lane, and demolishing a significant proportion of the buildings within the conservation area, erecting a taller section that will overwhelm and damage the setting of all of the adjacent buildings which are now all listed grade II.

SMS has produced their alternative scheme, in the hope that it will open the decision-makers' eyes that there are many alternative ways whereby Selkirk House can be given new vitality and the adjacent buildings can once again contribute to the neighbourhood, rather than remain empty which is a direct consequence of the developers' speculative, and very short term commercial approach.

4. A Responsible Alternative Scheme

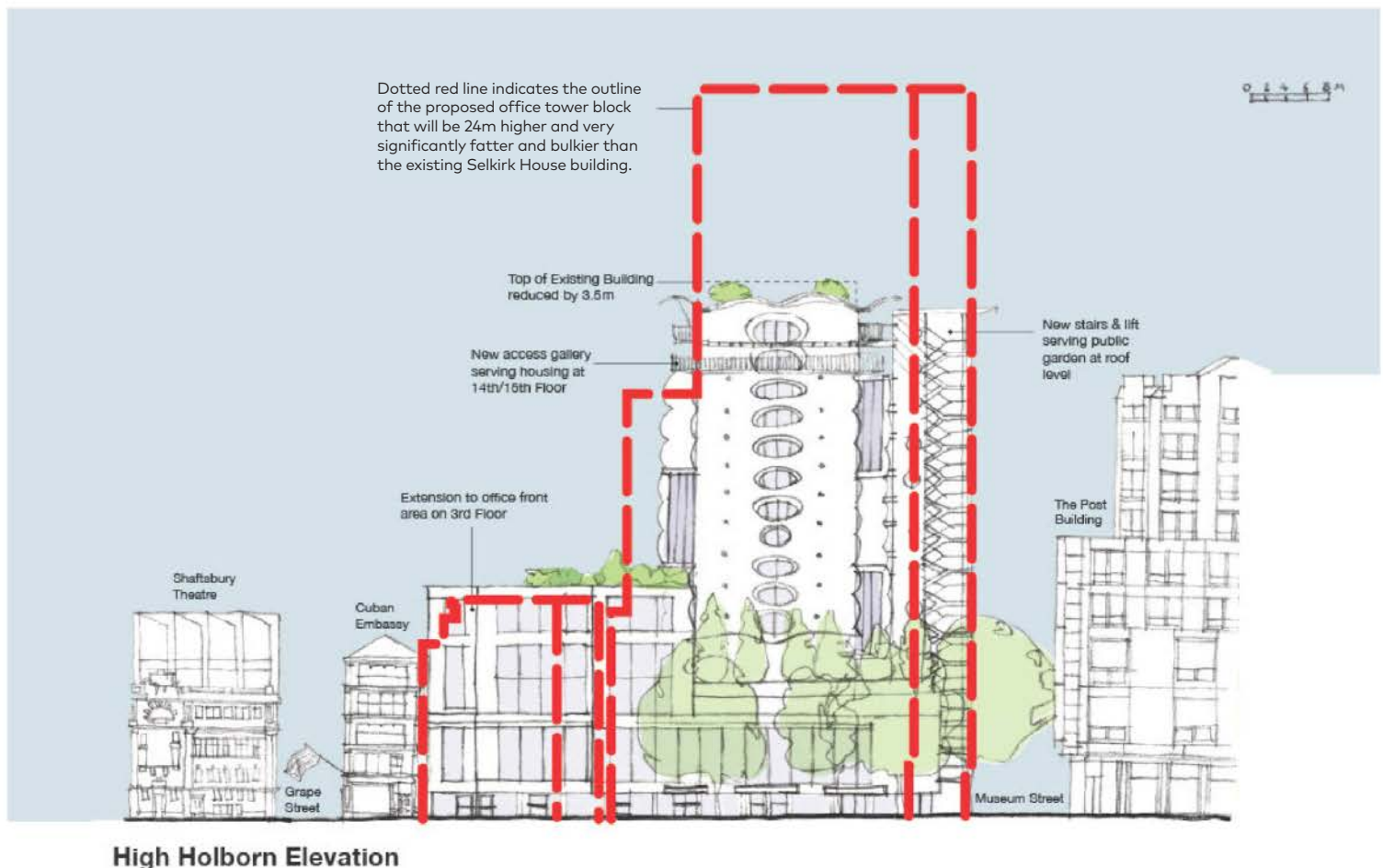
The alternative scheme is founded on sound principles of remodelling and reusing the existing buildings, introducing interesting and long-term viable new uses that contribute to, and enhance existing industries. It is an alternative approach that will accentuate the positives of the existing structures, providing new and spectacular public facilities and restoring all the historic buildings within the conservation area.

The alternative scheme is also very different from the developers' approach in that the future of Selkirk House is addressed in its own right as are the buildings within the conservation area.

Our SMS design approach considers each block separately. The developers' proposition is to pile on as much commercial development as they think they can get away with on the Selkirk House site. To compensate, they have intensified the density and height of the buildings within the conservation area with more acceptable uses, thereby damaging the quality of the historic buildings.

The alternative design also has the huge advantage over the developers' 'demolish-and-rebuild' or 'slash-and-burn' approach, in that keeping the existing buildings massively reduces the construction period and consequently, very substantially reduces the overall costs of the development. Retaining most of the existing buildings cuts the demolition costs, resulting in a radically shorter construction period (from 4.5 years to 2.5 years), so reducing the disruption and noise that will affect the neighbourhood, damaging adjacent businesses and institutions and not least, the everyday lives of many local residents.

The following drawings are labelled up and explain in detail the disposition of proposed uses and the physical proposals.



Existing Travelodge /Selkirk House

Location: High Holborn, Museum Street and the south side of West Central Street including the vacant land on the west side of West Central Street behind Grape Street.

The structure is retained and adapted: a section of the existing above-ground car park to the rear is demolished to make way for new housing that also incorporates the existing vacant site on the west side of West Central Street. The height of the existing Selkirk tower is reduced by 3.5m by removing the existing top floor screening so the overall height will be 50m, 24m lower than the proposed tower block. The roofline will be hugely enhanced by a landscaped public garden offering spectacular views over central London and acting as a magnet for Londoners and tourists which will substantially enhance the value of the development.

The lower two levels of the car park are retained for electric cars, cycle storage and use as a local retail delivery hub. The High Holborn podium element of the existing building is extended two floors to provide additional office accommodation and the footprint of the tower at ground and first floor level is extended eastward up to the existing tree line.

The Selkirk House elevations are completely remodelled and extended outwards in varying bays to provide internal breakout greenhouse areas, a passive ventilation system. This excites the eye, giving the building a lively and unique appearance. The top two floors, currently residential accommodation, are retained in the same use and the accommodation is extended with private balconies and a new external circulation route that wraps around the building at the 12th floor level. A new external lift and stairs is attached to the building at the junction of High Holborn and Museum Street, providing access to the public roof garden and cafe area. The tourist information centre, providing access to the Postal Rail system, a new tourist attraction, is located on the corner between High Holborn and Museum Street, adjacent to the public roof garden access point.

The existing basements are refurbished and a new fresh-air internal garden introduced for arts and theatrical uses, particularly dance and acting rehearsal studios, as well as facilities for the media and digital industries.



The existing Mail Rail at Farringdon which could be extended to Museum Street with its own entrance

The northern C19 section that falls within the Bloomsbury Conservation Area

Location: *New Oxford St., Museum St., West Central St.*

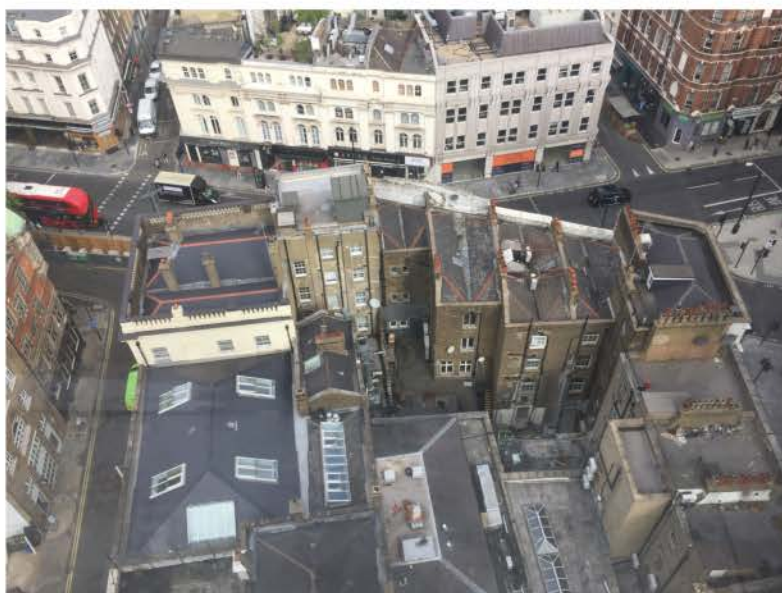
The vacant site on the west side of West Central Street is redeveloped to provide new housing with balconies which replaces the above ground car park. This new housing block reinstates the street facades and urban block and repairs the damaged streetscape.

The existing C19, mostly listed, terraced buildings contained within the Bloomsbury Conservation Area along New Oxford Street, Museum Street and the north and east side of West Central Street, are restored. The stable yard space, 16b West Central Street, is cleared of the C20th clutter of sheds and reinstated as an open yard, (Stable Yard). This is used as a sitting-out and trading area, serviced by the retail units occupying the ground floor and basement levels within each terraced house surrounding the yard. The existing street screen, designed by the famous architect Fitzroy Doll, is retained and restored with open gates into the yard that are secured at night.

Stable Yard could also be used as an open-air market stalls area, that would spill out into a section of West Central Street. The space would not be dissimilar to Neal's Yard that is in nearby Seven Dials in Covent Garden to the south. The existing 2 storey stable block, 16a/18 West Central Street, would be restored and extended on the corner to match the second floor of 18 West Central Street. This could be a restaurant, cafe and exhibition area and would be connected to the renovated basement restaurant and entertainment facility under the opened-up Stable Yard courtyard above.

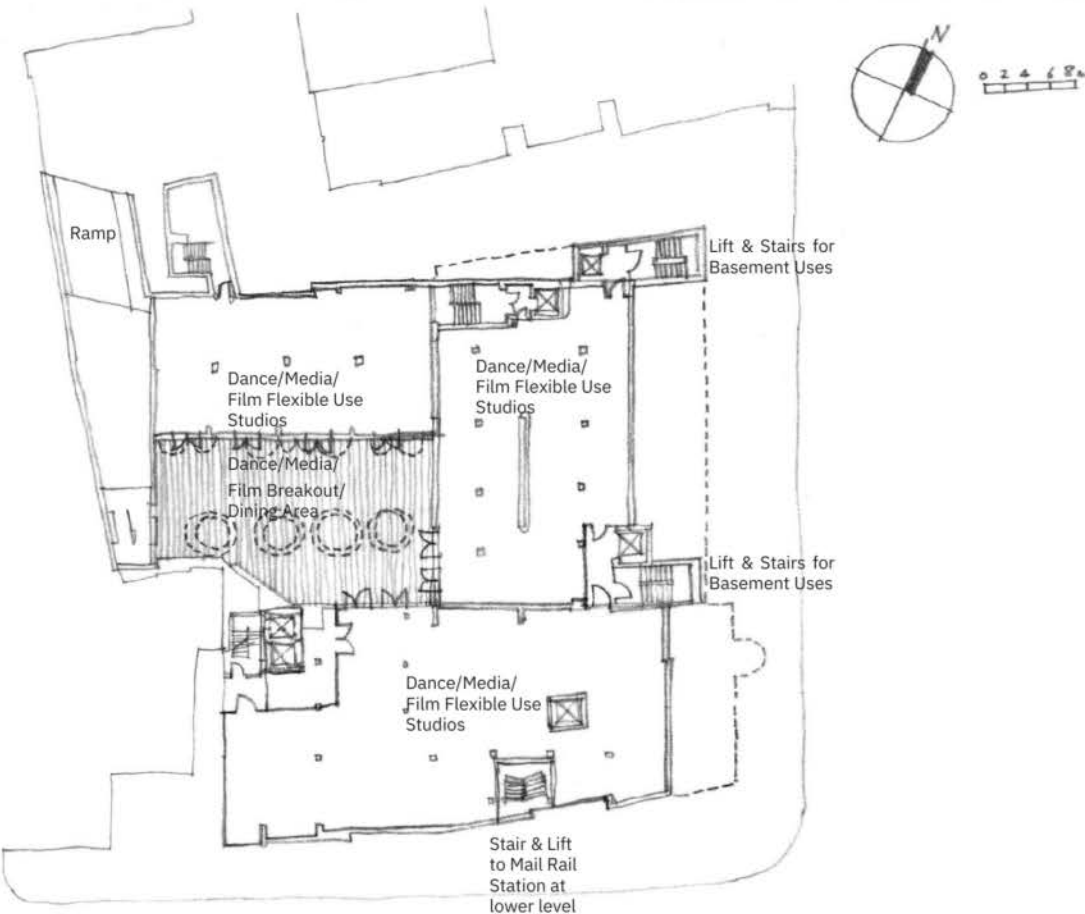
The upper floors of the terraced properties are renovated and remain in residential use, and are accessed straight from the streets. The building work and restoration entirely respects the original layout of the individual listed terraced houses and unlike the developers' approach, does not ignore the original historic layout of each property. Each property has its own private rooftop garden or extensive terrace overlooking the opened-up Stable Yard.

The whole approach to the restoration of the northern section differs markedly from the developers' scheme in that it respects the existing buildings as they are, and does not redevelop all the buildings along West Central Street.

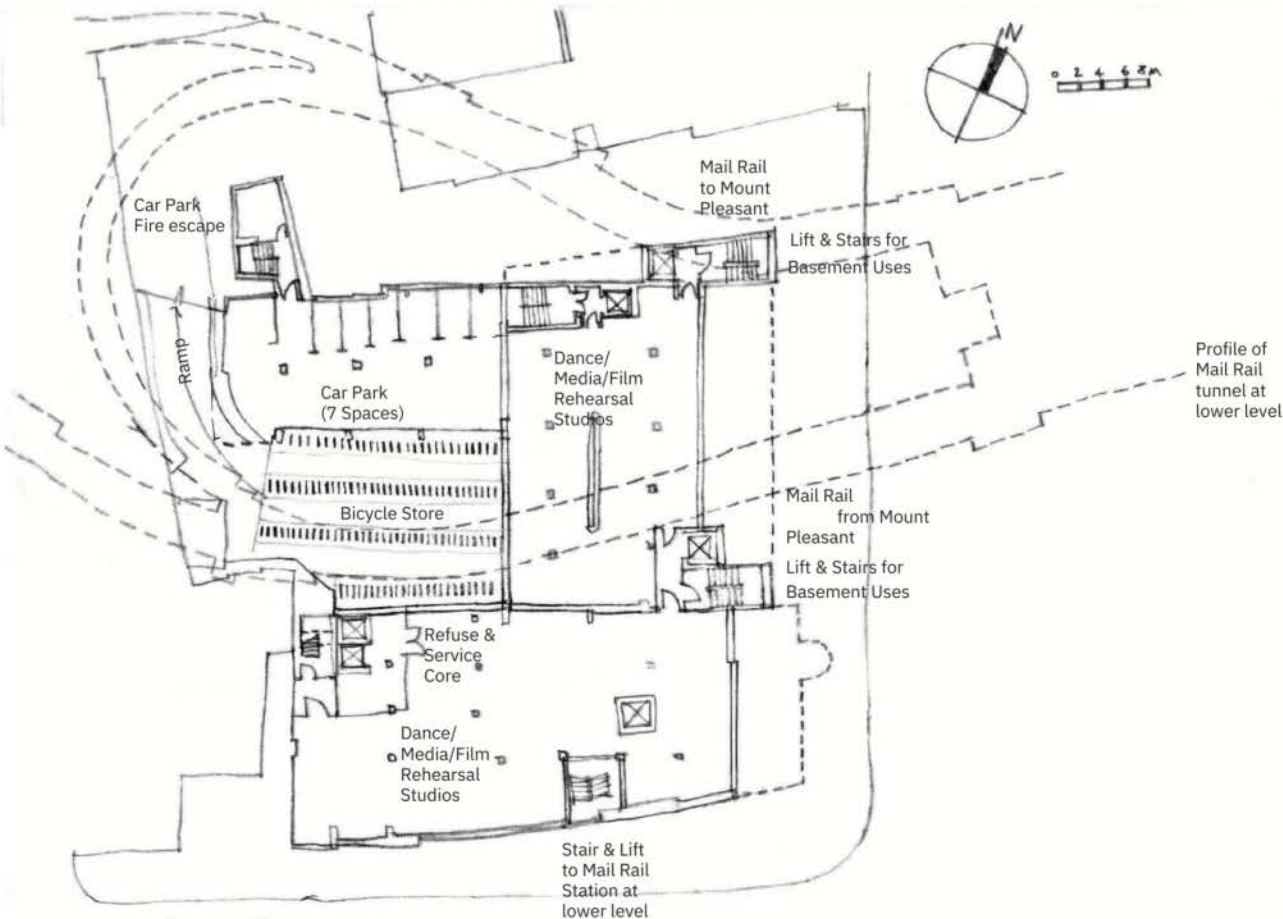


The aerial view with New Oxford Street at the top and West Central running down the left side and along the bottom

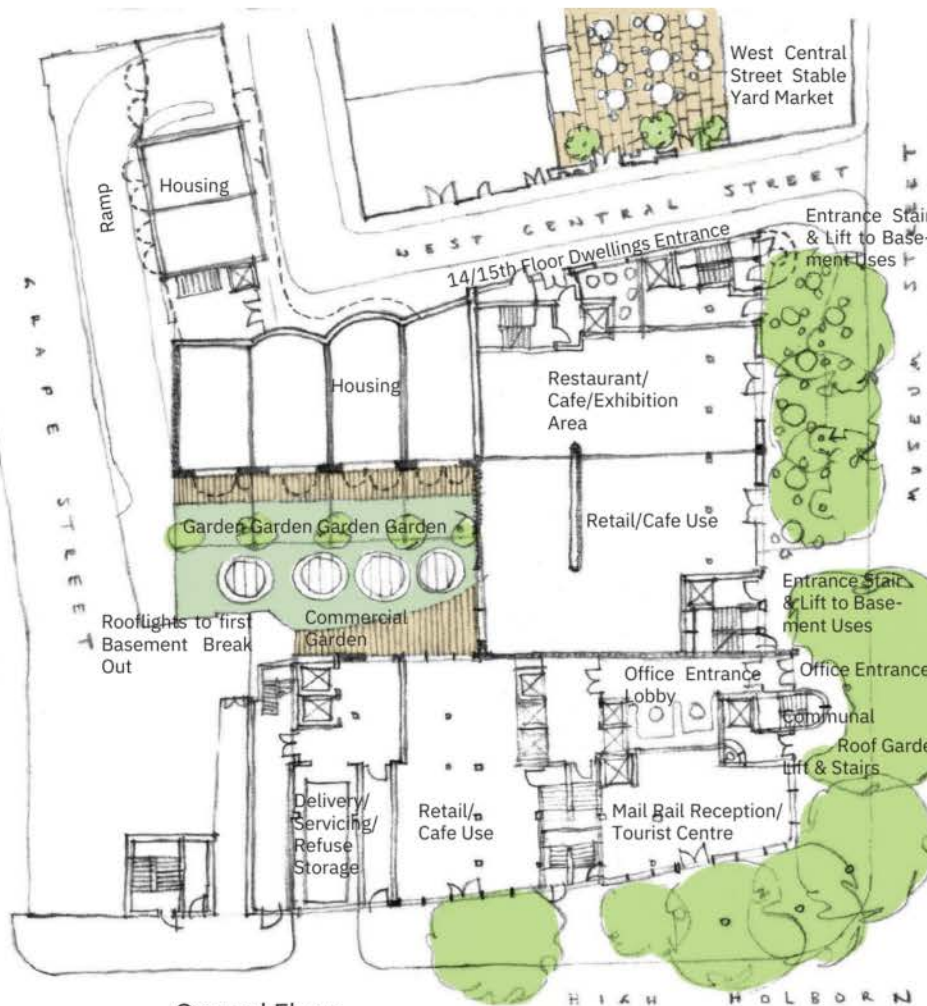
Alternate scheme sketches: Selkirk Tower



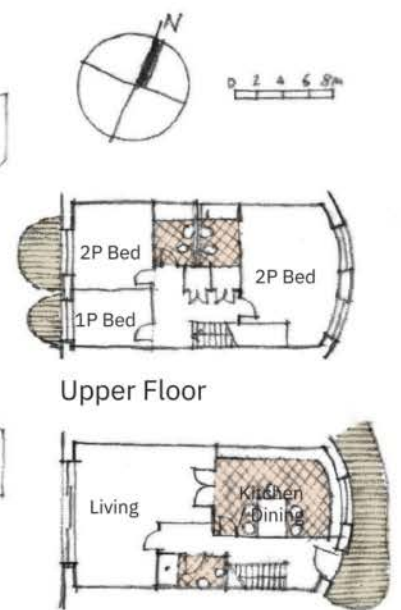
First Basement



Second Basement



Ground Floor



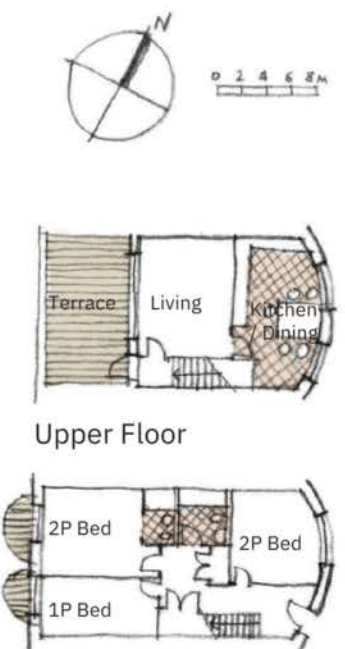
Upper Floor

Lower Floor

West Central Street Typical
3B 5P Maisonette



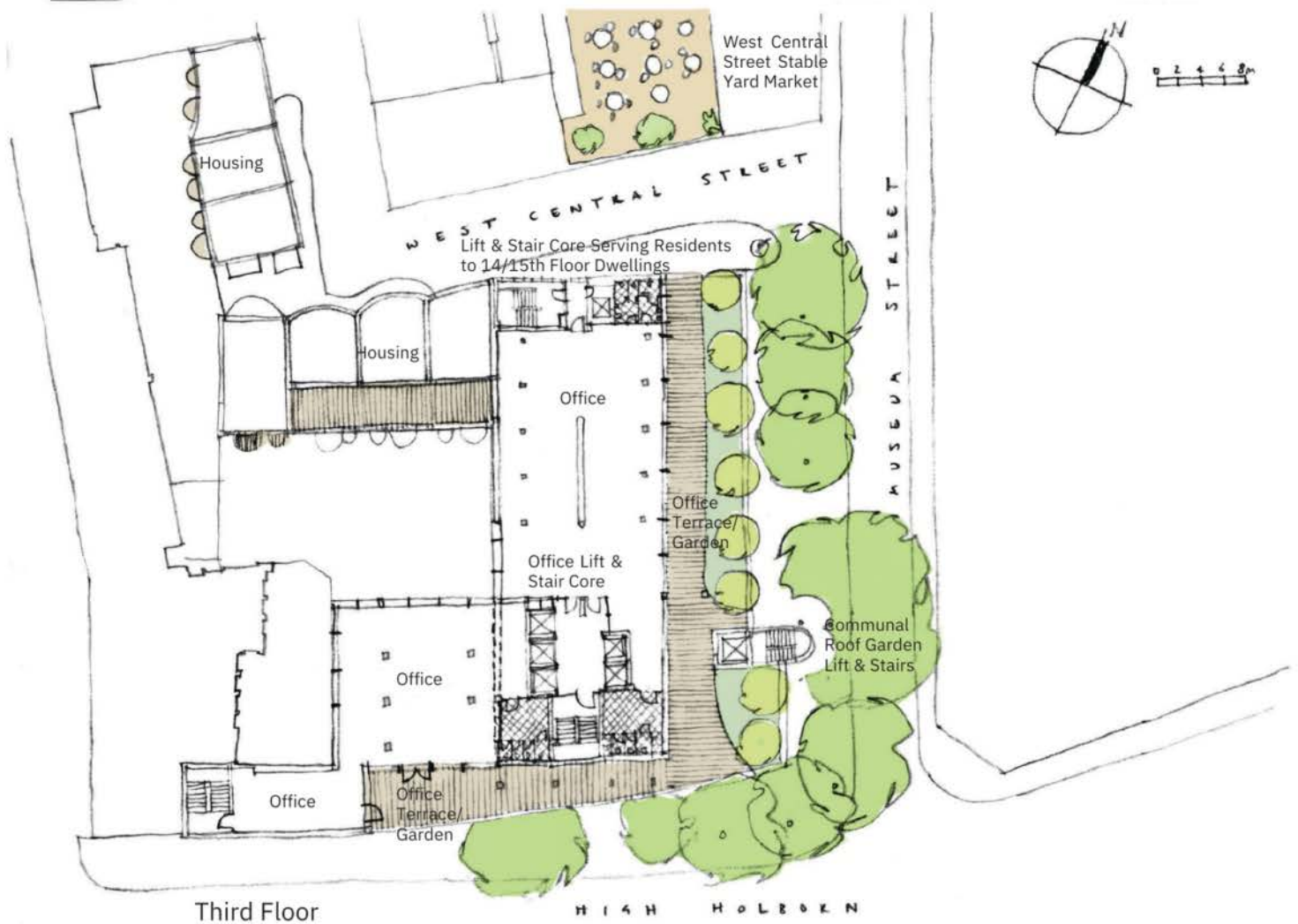
First & Second Floor



Upper Floor

Lower Floor

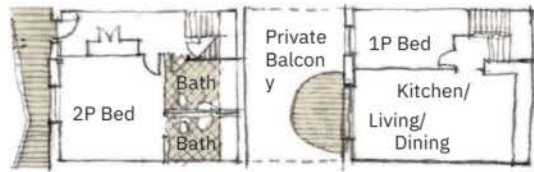
West Central Street Typical
3B 5P Maisonette





Top 2B 3P Maisonettes

New External covered Access Deck



Lower Floor

Upper Floor



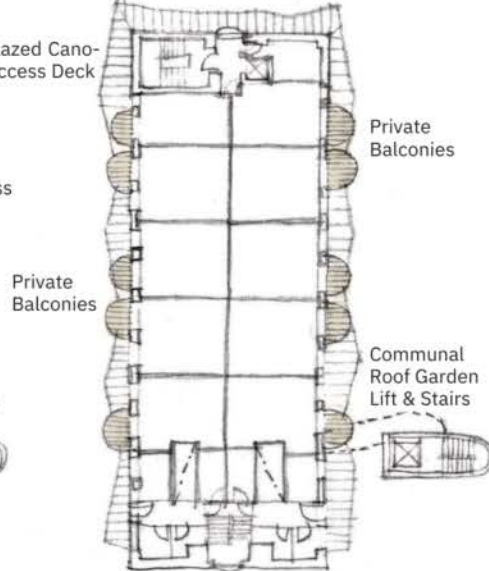
0 2 4 6 8m

Lift & Stair Core Serving Residents to 14/15th Floor Dwellings



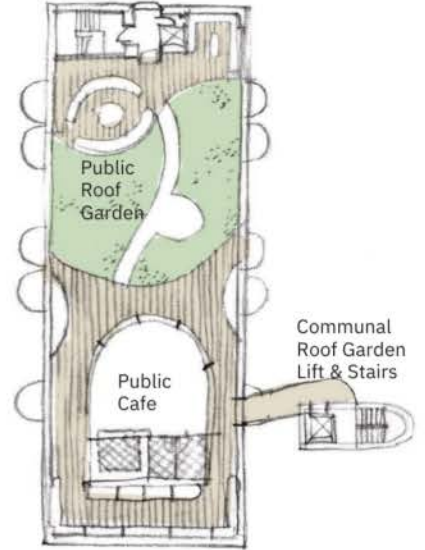
Fourteenth Floor

Lift & Stair Core Serving Residents

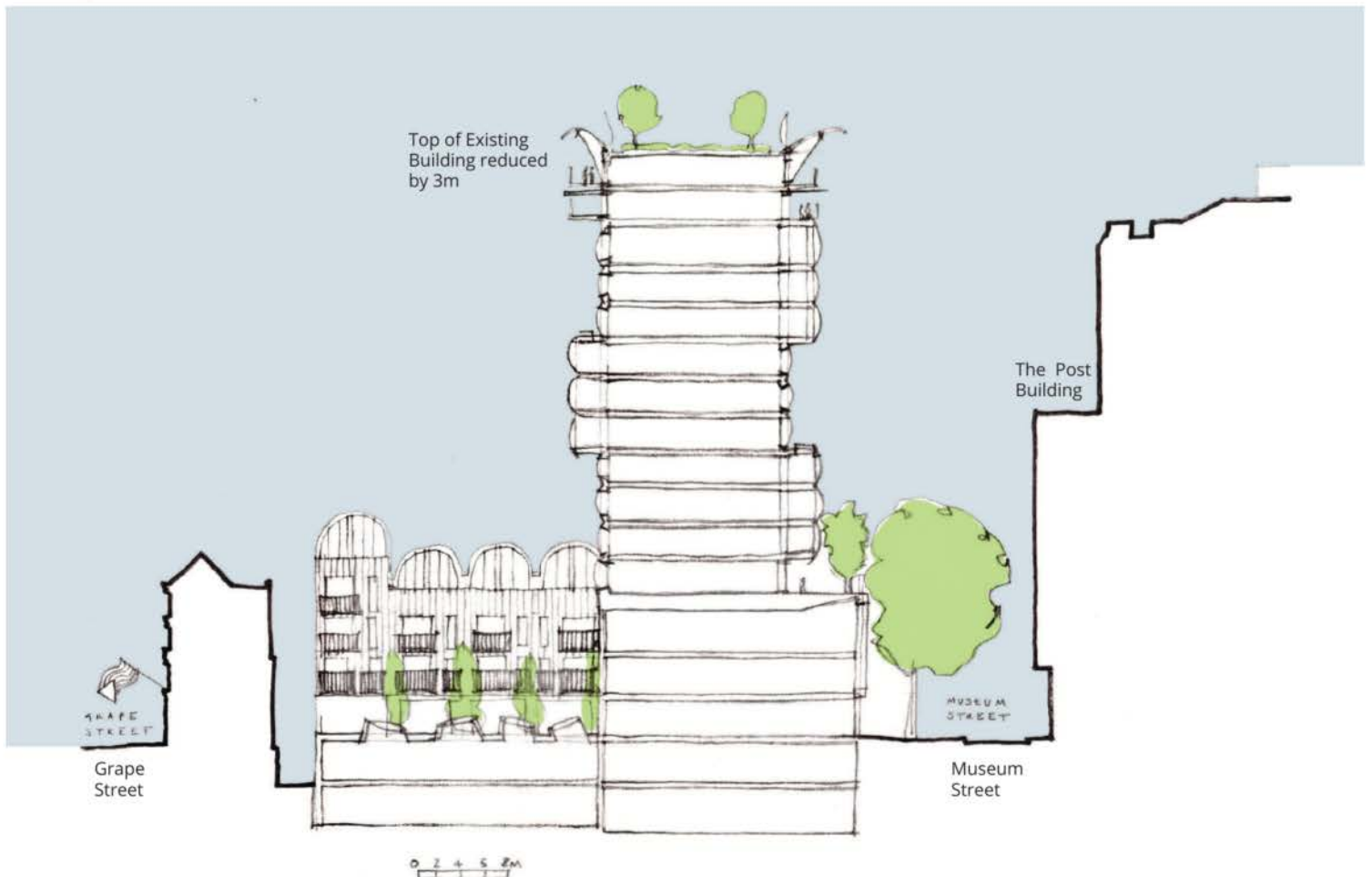


Fifteenth Floor

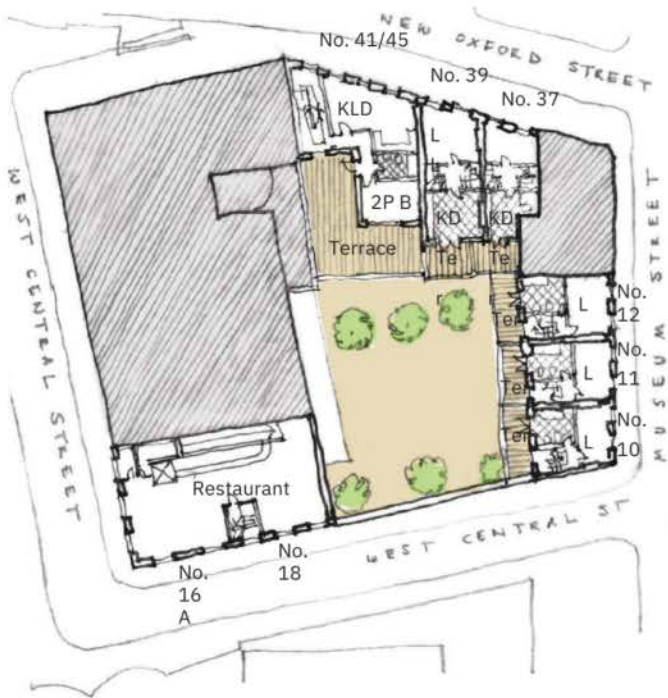
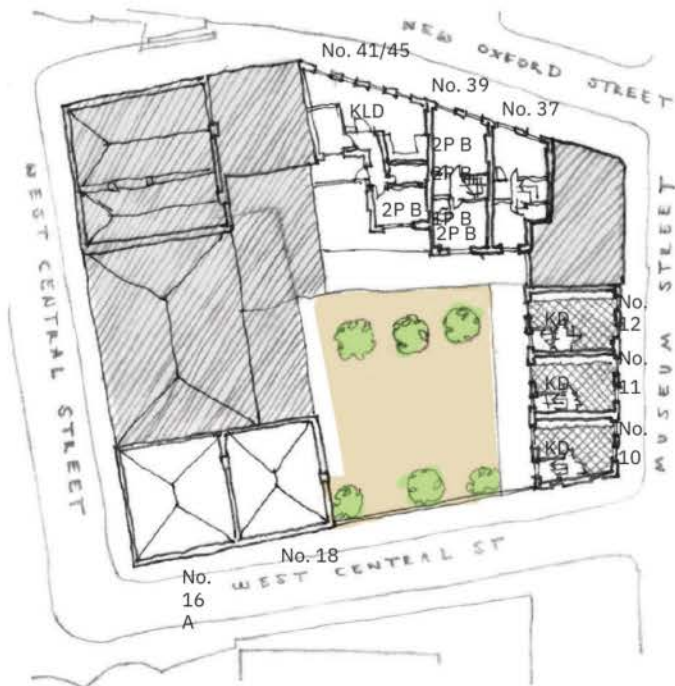
Lift & Stair Core Serving Residents



Sixteenth floor
Public Roof Garden



Cross Section

[illegible]

17

Refurbished
& extended
offices (1st to
13th floors)

Roof garden
& cafe

Public Roof
Garden Lift
& Stairs

Entrance to
Mail Rail
reception/
tourist centre

Office
entrance

Entrance stair & lift
to basement
uses

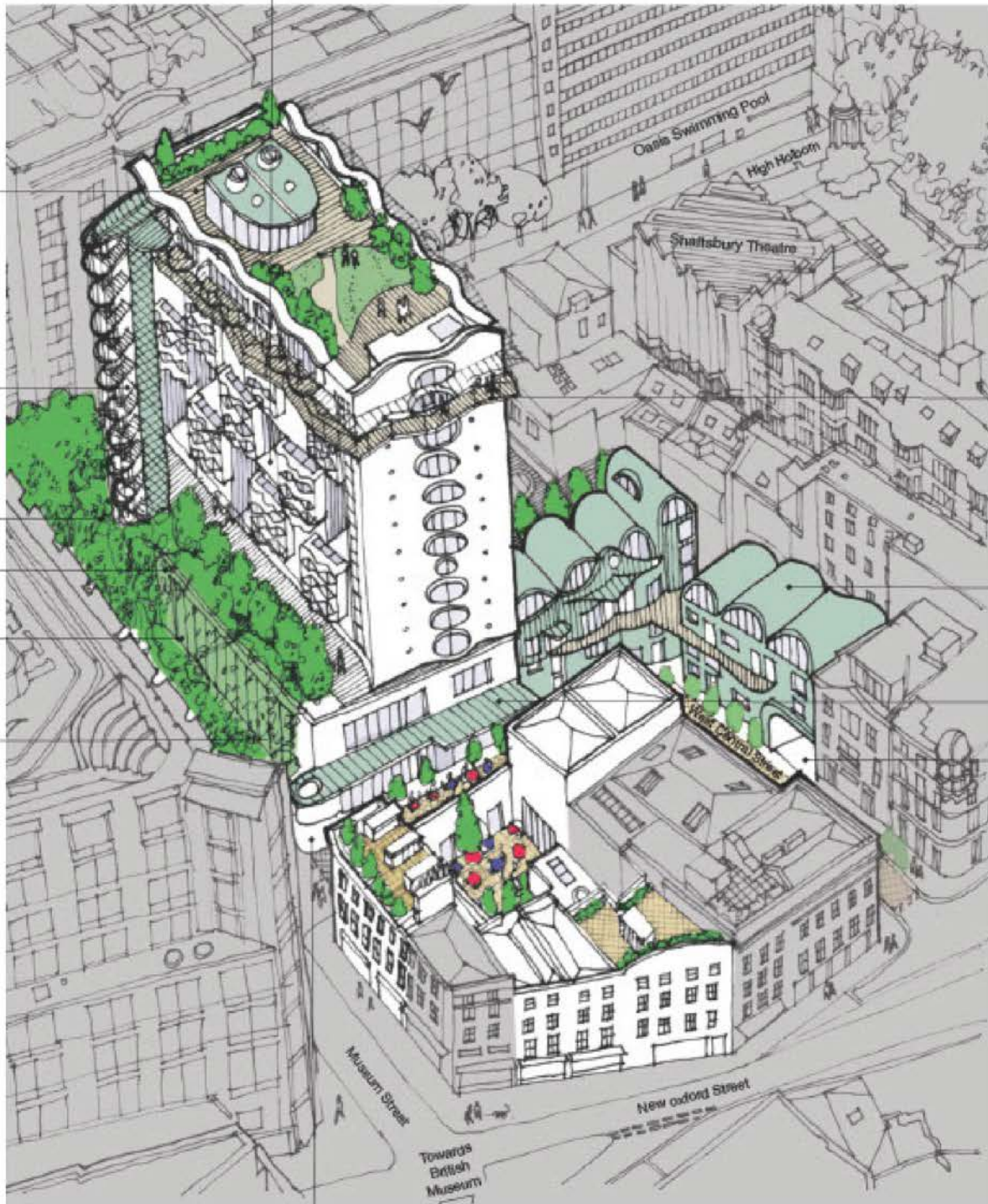
Retail &
restaurant
use with
cafe on
street

14/15th floor
enlarged
maisonettes
with new
external
access deck
& balconies

New 4/5
storey
housing
on infill
site

14/15th floor
housing
entrance

Entrance
to existing
2nd basement
car park &
local servicing
core



Entrance stair &
lift to basement
uses

5. Sustainability

We have a climate emergency. It is now essential to substantially reduce carbon emissions in order to avert a climate catastrophe. The construction industry is the source of over 40% of the UK's carbon emissions. António Guterres, Secretary General of the United Nations, when unveiling the latest Panel on Climate Change report in March 2023, stated that, 'time is running out very fast' and that humanity 'is on thin ice - and the ice is melting fast'. He called for leaders of developed countries to commit to reaching net zero as close as possible to 2040, ten years earlier than the UK's current target, if there is to be any chance of avoiding impending disaster. He specifically highlighted the need for the construction industry to address sustainability.

In his report (see above), Simon Sturgis showed that the developers' proposals for One Museum Street will be grossly over the UK Government's 1990-2050 trajectory for the reduction of carbon emissions, let alone the required earlier 2040 date that the UN says is imperative to stave off climate disaster.

The carbon cost of the proposed development will emit around 64,000TCO₂e of unnecessary carbon emissions over the next 60 years and generate a significant amount of unnecessary waste. Sturgis calculates that the demolition-and-rebuild of 1 Museum Street, compared to a retrofit of the existing building, would necessitate some 1 million trees ten years to absorb the additional carbon emissions.

The London Borough of Camden should require a positive forward-looking architectural proposal and whole-life carbon assessment. The central premise should be to retain most of the existing structure and add to or adapt this creatively. This may not produce the level of profit that the developers wish, but it will produce a better scheme at far less environmental cost. Selkirk House is structurally sound and can be adapted, extended, and renovated. There is no architectural or structural reason why the building should not be retrofitted.

This development is in fundamental opposition to the sustainability goals of Camden Council, Greater London and those of the entire country.

The proposed demolition is in carbon terms against UK National Policy, Greater London Authority's (GLA) Policies and intentions, as well as Camden Council's own declared climate and ecological emergency and its resulting policies and intentions. There is ample policy at national, GLA and local level to demand rejection of the developers' proposals. The scheme fails to meet the whole life carbon benchmarks of The London Energy Transformation Initiative (LETI), the Royal Institute of British Architects (RIBA), and the GLA, and has a carbon cost per m², of 1294 kgCO₂e/m², which is exceptionally high and outside LETI / RIBA / GLA Aspirational Targets

Sustainability

The current redevelopment proposals will worsen the climate emergency.

Does demolition stack up in terms of carbon emissions policies?

UK National Policy - **FAILS**

Greater London Authority's (GLA) Policies and intentions - **FAILS**

Camden Council's climate and ecological emergency policies and intentions - **FAILS**

The London Energy Transformation Initiative (LETI) Benchmarks - **FAILS**

Royal Institute of British Architects (RIBA) Policy - **FAILS**

Resulting in a carbon cost per m², of 1194 kgCO₂e/m², which is exceptionally high and outside LETI / RIBA / GLA Aspirational Targets



New Build vs Retrofit

The demolition and rebuild of 1 Museum Street compared to a retrofit of the existing building is likely to require some 1 million trees 10 years to absorb the additional carbon emissions.

"Approval of this scheme will demonstrate that Camden have abandoned their stated intention "to achieve a Net Zero Carbon borough and city by 2030, 20 years ahead of the national target". It is ironic that a Labour Borough is demonstrating, in practice, a worse carbon position than a Conservative Government "

- Simon Sturgis - Targeting Zero

6. Proposed Planning Design Brief for Camden Council

Height and Context

To respect the quality of the surrounding townscape, a building exceeding the height of the existing Selkirk House will not be acceptable and ideally should be of lesser height. If development intensification of the Selkirk House site is to occur, alternative methods of achieving high density should be pursued, which will be more successful in integrating with its surroundings.

Any development should be of a scale and appearance which does not harm but enhances the character and appearance of the Bloomsbury Conservation Area and the setting of neighbouring listed buildings.

Climate Change

In accordance with policy, the retention, adaption and beneficial reuse of the existing Selkirk House must be the first consideration. Any development must keep carbon emissions to a minimum. The development should be founded on a retrofit approach, not total redevelopment, and should seek to retain and convert the existing buildings in order to ensure compliance with national and local zero carbon emission obligations and aspirations.

Historic Assets

The aim should be to retain all the buildings within the conservation area, many of which are now listed, and ensure that their fabric is protected, restored and enhanced. These should be treated separately from any proposals for Selkirk House, and fully assessed within the context of the conservation area policies and Camden Design Policies. The historical assets should not be subservient to the development aspirations for Selkirk House.

Any development must preserve and enhance the character and appearance of the Bloomsbury Conservation Area and the setting of listed buildings including the British Museum, St George's Church and Bedford Square and enhance the other buildings which positively contribute to the conservation area.

The existing historic building plots should be respected and the historic street layout retained.

Uses

Housing

The London Plan highlights the need for affordable housing and this should be the prime development driver rather than speculative office development. The existing residential accommodation within Selkirk House should be retained and remodelled and the development should optimise the potential of the site to provide new affordable housing.

Tourism

The existing GPO train system beneath Selkirk House could become a destination tourist attraction together with a substantial tourist information centre. This location close to the British Museum and Covent Garden would enhance and strengthen the local economy. This could be combined with cafe and restaurant facilities at street level together with much needed public toilets.

The existing building could provide space for hotel short-stay accommodation (for example an approx. 200 bed hotel/ or YMCA venue). Hotel accommodation is in great demand.

Entertainment

Theatre industry support facilities should be provided (rehearsal studios, electrical stage lighting, set design and storage, specialist workshops etc); film, post-production and performance studios are also in big demand. Selkirk House is ideally located and has ideal spaces for these uses.

Public Open Space

Genuine new public open space at roof levels (possibly attached to cafe facilities), should be provided in accordance with the Camden's Local Plan's Open Space policies. The City Corporation's initiatives of providing publicly accessible open space at roof level should be emulated. Re-surfacing of pavements and providing some planting does not meet the obligations set out in Camden's Local Plan which requires that new public open space must be provided as part of any large commercial development; improved street finishes, although desirable, cannot masquerade as **new** public open space.

Provision of a local doctors' surgery and other medical facilities is much required. Offices or hotel use could be accommodated, as before, in the existing tower.

Area transport and servicing

Off-street car parking should be retained for electric cars, a local distribution hub for deliveries, and secure public cycle parking with associated storage and shower facilities should be provided within the existing car park.

**PLEASE INFORM CAMDEN PLANNERS IF YOU
CONSIDER THE DEVELOPERS' SCHEME IS
UNACCEPTABLE by emailing your objection to:**

**planning@camden.gov.uk
cc DavidFowler@camden.gov.uk**

**Please if you have time, copy us in to your objection to
Camden: cc SaveMuseumStreet@CoventGarden.org.uk**

**You must include the planning reference numbers:
2023/2510/P and 2023/2653/L**

**Remember to register your email as an Objection, not a
Comment.**

PLEASE SEND IN YOUR COMMENTS STRAIGHT AWAY

**If you write a letter concerning the development the postal
address is:**

**Development Management, Camden Town Hall, 5 Pancras
Square N1C 4AG**

**Again, you must quote the planning reference numbers:
2023/2510/P & 2023/2653/L**

PLEASE Support our campaign

**All the local groups have joined together to fight this
development and we need your support.**

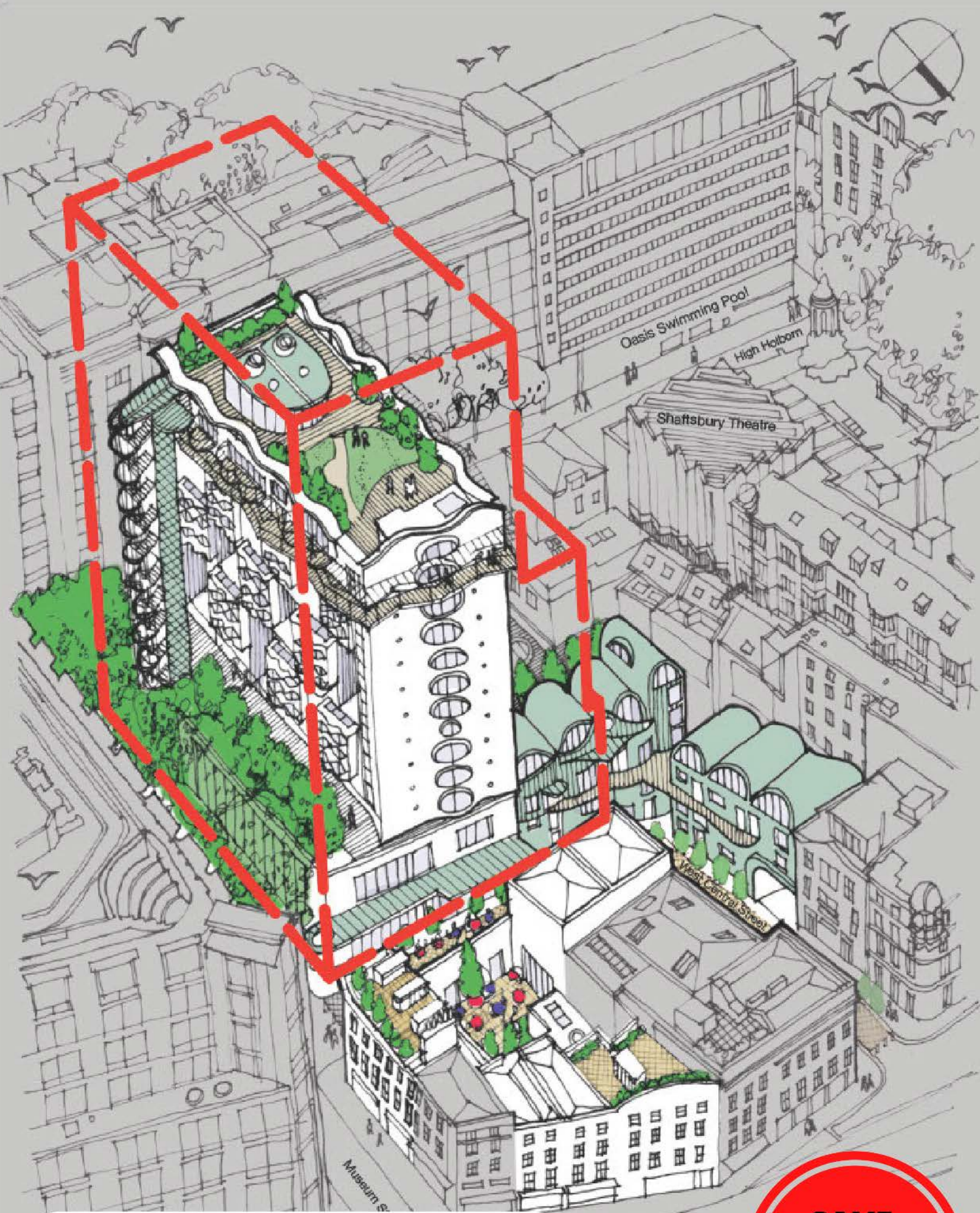
**Contact us if you can help by leafleting or other expertise:
SaveMuseumStreet@CoventGarden.org.uk**

**Please donate to help pay for leaflets and legal advice care
of: The Bloomsbury Association**

Sort code:30- 96-26 Account:42053560

Ref: Save Museum Street

Thank You



Dotted red line indicates the outline of the proposed office tower block that will be 24m higher and very significantly fatter and bulkier than the existing Selkirk House building. The visual damage the proposed tower block will inflict on the Bloomsbury Conservation Area and unique historic buildings (the British Museum, Bedford Square and St George's Church which are all listed Grade I) is totally unacceptable.

