

Flat 3
Queen Alexandra Mansions
Grape Street
London WC2H 8DX



London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

10 July 2021

Dear Sirs

Planning application ref 2021/2954/P (*Application*)
Proposed redevelopment of The Selkirk Building, Museum Street and West
Central Street

I refer to the Application.

Introduction

I make this submission as a resident of Queen Alexandra Mansions, Grape Street. My building would apparently become part of the boundary of the proposed demolition and reconstruction site, with the rear wall possibly becoming a party wall. Just as importantly, local residents and businesses would be forced to endure the noise and vibration nuisance (as well as the dirt and dust and traffic disruption) of the demolition and construction period (which has, alarmingly, grown from 3 years (December 2020 zoom) to “approximately” four years in the space of just over 6 months).

This is the first of a number of separate submissions I will be making on different aspects of the Application. It deals with the SCI Consultation document issued by London Communications on behalf of Labtech.

I make no apology for writing separately and specifically in relation to the SCI, because full and genuine consultation is essential for a controversial proposal which includes (but is not limited to) so conspicuous a tower block in such a sensitive part of London, adversely affecting the Bloomsbury Conservation Area. Even Labtech's paid apologists admit it is a strategically important site.

I invite the Council to reject the Application in its present form, for the reasons set out below. Other objections, focussed on different aspects of the Application, will follow.

Should the Council have the power, I would have no objection to it adjourning consideration of the Application pending a genuine consultation process in which Labtech:

- ∞ Provides clear and transparent answers to key questions, many of which have been outstanding for months;
- ∞ Listens to, and takes account of, the views of local residents and community and amenity groups.

Both these elements have been lacking so far. Such a process, carried out in good faith, might be expected to lead to a revised application which might elicit less justified opposition from the community.

This would also permit the Council to have time to respond to relevant policy questions which it has not been able to deal with so far in 2021.

There is a due process issue here. If there is not a full and transparent consultation process, how can those affected exercise their rights to make informed representations on the proposals?

Labtech and its professionals appear to have hidden behind Covid restrictions so as to avoid full transparency about their proposals. Advantage should be taken of the imminent relaxation of Covid restrictions to require Labtech to put on public display (for example in the buffet area on the ground floor of the former Travelodge) a physical model of the proposals for the entire site, including West Central Street and New Oxford Street and showing their impact, in terms of proximity, height and massing, on Grape Street. Inspections could be arranged by appointment, to ensure responsible social distancing.

This is in many ways several distinct development proposals wrapped into one planning application. At the moment, it is very difficult for residents of West Central Street and Grape Street to have a clear conception of what the cumulative impact of the proposals, if built, would be. Such discussions as there have been have inevitably concentrated on the

many issues surrounding the controversial 80 metre tower block proposed on the former Travelodge site, as well as attempting to dispel some of the inexplicable opacity as to the exact quantity of residential accommodation already in existence on the site. As a result, there has been very little exposition of the proposals for the West Central Street or New Oxford Street sites.

Other factors may encourage a delay, not least the need to rethink the overall project (including multiple technical aspects relating to improved access and ventilation arrangements) in the light of Covid. Indeed, this would be an opportunity to form an informed opinion as to whether such a large amount of additional office space is required post Covid. It would be unfortunate for the Council to repeat the history of the early and empty years of Centre Point.

General Comments about the SCI and the process

London Communications rightly admit in para 1.12 that this is a strategically important site. I note, however, that they seem to undercut the implications of this acknowledgement by playing on the fact that technically the Selkirk House building is outside the Bloomsbury Conservation area, as if what is done to the Selkirk House site is incapable of prejudicing the Conservation area.

I am advised that Camden's policy is to strongly encourage consultation by developers with local residents, amenity and interest groups and interested parties.

The SCI is seriously misleading. It ignores the express statement of Mr Watson of Labtech at a zoom meeting held on 15 April. That meeting was organized by local community groups. The purpose of this meeting, faced with a complete lack of community engagement by Labtech, was to propose a genuine dialogue between Labtech and the various community groups and individuals who had come together to express their concerns about this development. At that meeting, Jonathan Watson on behalf of Labtech made the categorical and very significant statement that Labtech had no intention to discuss their brief nor for that matter anything above the ground floor level with the local community, asserting (incorrectly as it subsequently turned out) that this had been agreed with Camden. According to Mr Watson, any consultation would be limited to the landscaping proposals. This meeting is included in the SCI among the list of consultations, but this important refusal (contrary to Camden's recommended policies) is omitted, rendering the SCI fundamentally misleading. It is evident why the SCI makes no reference to this statement by Jonathan Watson, as it is incompatible with the attempt contained in the SCI to convey the impression that there has been a genuine consultation process.

The SCI also suggests that Labtech fundamentally misunderstands the concept of consultation, which involves both providing (complete and accurate) information and listening to the views of consultees. Entirely consistent with the candid comments of Mr

Watson on 15 April, the so-called consultation process has been an exercise in Labtech, supremely confident it will get its way, telling residents and community and amenity groups what it is going to do, on a “take it or leave it” basis. I commend Mr Watson’s candour but the Council must take account, in considering the planning application, of the fact that Labtech has deliberately decided to flout Camden’s advice and recommendations. Labtech has compounded this error of judgment by inaccurately claiming it has Camden’s support for this approach. Such arrogant and inconsiderate behaviour should have consequences; otherwise, why does Camden have policies? This approach on the part of Labtech is all the more serious given the controversial nature of the Labtech proposal and the sensitive nature of the site and the surrounding environment affected.

Labtech and its professional team seem to be under the impression that they can tick the consultation box simply by broadcasting, in a thoroughly unilateralist manner, their intentions. The most notable example of this state of mind is to be found in para 3.13 of the SCI, where they refer to a “consultation” website, indicating that, for Labtech, propaganda and consultation are indistinguishable. Another illustration of Labtech’s minimalist approach to the concept of consultation is to be seen when one looks at the very trivial changes to which they refer in para 4.12 of the SCI. Some of these have been imposed by the Council or reflect a belated acknowledgement of the actual quantity of existing residential accommodation in the current buildings. These minor changes are in stark contrast to the volume of comments and criticisms which have been lodged with Labtech and the Council.

Even if one accepts Labtech’s interpretation of the meaning of “consult” (which I do not), it is clear from Labtech’s own SCI summary that Labtech were somewhat selective in terms of the bodies with which it communicated. In particular, there has in reality been very little attempt to have engagement with the local residents, who would be those who would have to suffer, for upwards of four years, through the demolition and construction phases and then have to live with, and in the shadow of, the finished result. Significantly, Labtech did not initiate either of the two main set piece sessions involving local residents - one (December 2020) was organised by Camden and the other (April 2021) by community groups. This contrasts starkly with what I understand to have been the significant efforts by Labtech to court Council members.

This lack of genuine consultation is all the more strange and inadmissible given that Labtech boast a director whose title is *director of community engagement* and who, in addition, manages to combine that role with being a Camden Councillor.

In my letter of 29 December 2020 I made comments about the unsatisfactory nature of the zoom session organised by the Council earlier that month.

Before making detailed comments on the SCI, I should like to make a few other general points:

- ∞ The SCI is very repetitive, as if an attempt is being made to bulk out a very limited exercise;
- ∞ It is also rather selective, as explained below;
- ∞ The SCI talks of a process which apparently began in 2017. This came as a surprise to me, as I was unaware of any proposals until one of the local community groups informed me towards the end of 2020. I understand that in earlier discussions which took place (and of which local residents were not informed) there was a proposal to construct a hotel or possibly to refurbish the existing hotel.
- ∞ More generally, there has been a pattern of evasiveness on the part of Labtech and its team. I first mentioned this in my letter of 29 December 2020, in which I responded to Camden's request for feedback on the zoom meeting it had organized earlier in that month. For example, Labtech were clearly reluctant to reveal the exact height of the proposed tower.
- ∞ The SCI uses in a number of places the term *stakeholders*. It is not clear what is meant by that term, but it would appear to exclude local residents, since a number of the engagement activities with stakeholders described in the SCI have not extended to local residents.
- ∞ Another point which needs ventilation and clarification is the following. In response to follow up questions addressed to Labtech's professionals, a general message has come back that the tower, its height (in particular) and its dedication to office/ commercial use are inevitable and the only way of reconciling demands the Council is apparently making of Labtech with the (presumably capitalist) objectives of Labtech. It has, however, never been very clear what these inflexible demands of the Council are or from where they derive and, in particular, why the Council apparently insists on subordinating local housing need to the demolition of a hotel building and the erection of an 80 metre tall office tower block on a site adjoining the Bloomsbury Conservation area. It is almost as if Labtech is seeking to pass the blame for this unsightly structure on to the Council. Doubtless, as part of this process, Camden will have an opportunity to clarify to what extent it is requiring Labtech to draw up a project incorporating the proposed tower block and, more generally, what benefit Camden stands to derive should the Application be granted.

Detailed comments on the SCI

I set out detailed comments, by reference to numbered paragraphs of the SCI:

1.6: Insofar as relates to local residents, this is simply not correct, unless one adopts an inaccurate meaning of "consult" which excludes any element of listening to, or taking account of, views of supposed consultees. Such an approach would completely undermine the policy objective behind consultation processes.

1.9. this is also incorrect. According to Camden's planning team, the Council's policy is to strongly encourage consultation by developers with local residents, amenity and interest groups and interested parties.

In addition, at the zoom on 15 April 2021 organised by community groups, Jonathan Watson of Labtech misrepresented the views of Camden in seeking to justify Labtech's refusal to engage in consultation with local residents, amenity groups and community associations. Given that Camden's stated policy is as indicated above, it is hard to see how Labtech can justifiably claim that Labtech has taken the advice of Camden throughout its "consultation programme".

1.10. it is not correct that Labtech has responded in the SCI to **all** comments. it appears to have selectively summarized comments. In all the circumstances it must be questioned whether Labtech has genuinely given consideration to comments from local residents and community groups.

1.12. the use of the phrase "highly sustainable" is very carefully chosen and applied only to the completed project, avoiding the need to address the fact that the demolition and rebuilding processes proposed would, by themselves, not be a sustainable operation. This paragraph also conveys the impression that the *Holborn Vision* to which it refers is Camden policy, whereas its consultation process has never been completed and the proposal has not been adopted.

2.2: this is either fantasy or hypocrisy.

2.9: This is a good example of how selective the document is. It omits reference to the closest historic monument, namely Hawksmoor's St George's Bloomsbury, one of the most important buildings in this part of Camden, which is only yards away from the 80 metre proposed tower block. St George's is one of the listed buildings which makes the site of the proposed development so significant and sensitive, so that the proposed 80 metre tall tower block, which would overshadow the immediate vicinity, is wholly unsuitable.

2.14: I assume this is a reference to the former hotel proposals.

2.15: it is rather odd that one of the stated principles is "further improve views" when the central structure proposed is a very conspicuous tower which will be an all too visible eyesore from key vantage points such as St George's Bloomsbury and the British Museum. Labtech has failed to provide other "as built" images, so one does not know what the impact would be from Bedford Square, Covent Garden or Lincoln's Inn Fields.

2.17: this is simply not correct. The chronology is strange, as it implies that "the uncertain times created by the pandemic" began in 2017.

The reference to 2017 creates an inaccurate impression, at least so far as relates to residents in the local community. The first time we became aware was in November or December 2020, and that was through community groups, not from Labtech.

As previously mentioned, the characterization of the April 2020 meeting organised by community groups is wholly misleading because it was an occasion on which Jonathan Watson of Labtech announced their unambiguous refusal to consult. I understand that there is a recording of the session should the Council wish to listen to it; I believe some Councilors participated.

2.22: this appears to omit at least some of the feedback provided, at the Council's request, following the zoom session organised by the Council in December 2020.

2.24: this is another example of the Labtech team being selective about feedback and criticisms.

2.25: this appears to be the first reference to the public (as distinct, for example, from undefined *stakeholders*). The characterization of the session as "...a number of questions put forward during the event by attendees" is misleading, as the Council will know; while there were many questions (which the Labtech team largely parried rather than answering), this description omits the general hostility to, and justified criticisms of, the Labtech proposals. The Council will have access to its recording of the proceedings.

2.29: again, this reference is misleading, since it omits any reference to the express refusal by Mr Watson of Labtech to carry out any substantive consultation, except on minor issues of gardening layout. It is not clear why Labtech refer to Miller Hare. In view of Mr Watson's categorical refusal to engage in consultation, their participation served no purpose.

3.2 (c): the use of the phrase "with as much detail as available at the time" reveals part of Labtech's obfuscatory tactics: when questions were asked at the December zoom session, many were met with replies suggesting that Labtech did not know the answer, or the exact answer. This vagueness even extended to the actual height of the tower block; it took several attempts to extract a reply. Incidentally this shows that Labtech are embarrassed to be proposing so tall a new structure in this sensitive position and they accept that it is a very controversial project.

3.2 (e): Labtech should be asked to explain to the Council how Mr Watson of Labtech's refusal to consult can be reconciled with the claim as to "how committed the team is to consultation and understanding people's views", unless the answer to "how committed" is "not at all".

3.4: once again the SCI is arguing two inconsistent points: that consultation started in 2017, long before Covid, and at the same time that Covid got in the way of the consultation process.

3.8: it is quite simply false to claim that in 2017 Labtech engaged with "local neighbours". The first I knew about the project was in November or December 2020, and that came from a community group. So far as I am aware, no project team meeting was offered by Labtech to local neighbours.

3.9: interestingly this contains no reference to reaching out to "local neighbours".

3.12: again, no reference to local neighbours.

3.14: This refers to information boards. I am not sure what this is referring to or where they were located, given that Labtech are claiming all the communications had to be virtual.

3.18: again, no reference to local neighbours.

3.21: the date is incorrect.

3.22: it is correct that this was an **opportunity** to put questions; sadly Labtech did not regard it as an opportunity to provide clear answers to many of them.

3.27: this is a remarkable and rather creative assertion, in view of the fact that Labtech's mouthpieces have displayed an obstinate unwillingness to indicate with any specificity what changes it has made to its proposal in the light, for example, of the comments made during the zoom meeting arranged by the Council in December 2020. When one reads the paucity of modifications summarized in paragraph 4.12, one understands why Labtech have been reluctant to provide any information about this.

3.34: once again, no reference to local neighbours.

4.4: when I first read this, it seemed rather a low number. I then realized that it is not a comprehensive total and appears to exclude any comments submitted (directly or via Camden at its request) other than through the consultation inbox and website surveys. This may therefore be another example of the SCI being somewhat selective. The percentages may consequently be misleading.

4.5: the use of the words “some of..” allow Labtech to be selective in putting this summary together. Note the contrast with 4.9 which conveys the impression that the list is an enumeration of **all** issues raised. It does, however, show that there are more grounds of opposition than of support.

4.11: Many of the Labtech’s responses are simply non sequiturs. For example, the response to the “out of character/ scale” comment is “a building is proposed will be a height [*not indicated*] of 22 storeys”. This is to re-state the problem, not to refute or justify it. The same comment uses a purely subjective opinion (elegant building) as to which there will be many divergent views. Even a building which some may regard as elegant may be too tall, wrongly sited or unsuited to its heritage environment. The use of the word *elegant* might have more force if it were not being wielded by a paid apologist for Labtech and its team. The cgi images make the proposed tower block look like a stump.

Other comments are pretty meaningless and do not address issues. A comment like: *The applicant has been mindful of keeping height to a minimum while being able to deliver all the space and amenities that would be asked of [sic] new tenants making use of such a development.*

lacks logic, as well as not being supported by the fact of a proposal to construct an 80 metre tower. Obviously an 80 metre tower, if filled, would have more tenants with, in aggregate, more demands. That argument could be used to justify a tower twice as high as that proposed. Indeed, the real position is quite the opposite of what Labtech contends. Assuming the proposed tower is built and filled with tenants, they will put additional pressure on the limited basic infrastructure in and around the conservation area.

4.12: the trivial nature of these adaptations (some at the instigation of the Council, not consultees, and others resulting from Labtech’s belated acknowledgement of the actual level of existing residential accommodation on site) shows how little Labtech has in fact listened to those who will be affected by its proposals. In particular, Labtech appears obstinately committed to the exceptional height of its proposed tower block.

Next steps

As already indicated, a greater degree of transparency is called for, so that there is more substance on which to comment in a more focussed manner. It is nevertheless quite plain that this proposal is highly problematic in multiple respects.

I am sending this letter to David Fowler, as suggested by him. Feel free to circulate this letter among your other colleagues who are responsible for reviewing this proposal, as well as to the various firms of consultants advising the developer.

Please advise me if there are to be further consultations or any formal hearing on the application, as I should like to attend and have the opportunity to make oral representations.

Yours faithfully,

Peter Bloxham