

04/08/21

Application: 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 demolition, remodelling and extension 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.

LPA ID: 2021/2954/P

Address: Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR

Dear Mr Fowler,

Thank you for notifying the Georgian Group of the above application for Full Planning Permission. On the basis of the information available to date, the Group objects to the application and recommends your Local Authority refuse permission.

Significance of the Area and Surrounding Designated Heritage Assets

The southern section of the application site, where Selkirk House is located, sits just outside the southern boundary of the Bloomsbury Conservation Area. Within close proximity to the application site are several nationally important buildings which will be harmed by the proposed development. This letter will highlight the significance of only those buildings that fall within The Georgian Group's remit (1700-1840), this does not mean that any building I do not describe will not be harmed by the proposed development.

Bedford Square, which sits to the northwest of the site, was built between 1776 and 1780 by W Scott and R Grews to the designs of either Thomas Leverton or

Robert Palmer. The central garden is designated at grade II* and surrounded by four grade I listed terraces giving the square an architectural uniformity which set the style for garden squares in London through the late 18th century and early 19th century. The Bloomsbury Conservation Area Appraisal states that 'Bedford Square is one of the most significant and complete examples of a Georgian Square in London'. At current, when positioned within the square you are afforded near uninterrupted views of the surrounding terraces, this is something that enhances the setting of the listed garden and surrounding buildings within the square.

Connected to Bedford Square by Montague Place is the grade II Park and Garden, Russell Square, with a number of original buildings to the west side of the square to the north of this terrace. The buildings to the south and north of the square have been altered. The garden itself was laid out by Humphrey Repton and is larger than any earlier London Square. Despite the alterations to the surrounding terraces, Russell Square possesses importance due to its relationship with the surviving garden squares within Bloomsbury; it is attached to Bedford Square by Montague Place and to the south Bloomsbury Square by Bedford Place. Bloomsbury Square, similarly, to Russell Square, has had the surrounding terraces altered or demolished. The garden was laid out by Humphrey Repton in circa 1806 and is grade II listed. These three squares still exhibit a plan of eighteenth and nineteenth century Bloomsbury and their setting should be protected along with the character of the wider Bloomsbury Conservation Area.

The British Museum which is located directly to the north of the application site is a Grecian building of exceptional architectural interest. The museum was designed by Sir Robert Smirke, who was then architect to the Office of Works and was tasked with designing a space for large sculptures but also collections of smaller artefacts. Smirke finalised the scheme in 1823, with the building of the museum being undertaken in various phases and altered in the following decades and centuries. The use of iron cramps to fix the large Portland Stone to a brick core was an innovative construction technique for the time and contributes to the significance of the building. The entrance front to the building is particularly impressive with Greek Ionic columns forming a portico and colonnade which can be appreciated from the forecourt. The setting of the

British Museum is enhanced by the visitors' experience within the forecourt, portico and the colonnade which contributes to the architectural interest of this grade I heritage asset.

Also situated to the north of the proposed development site, St George's Church, Bloomsbury by Nicholas Hawksmoor was built under the Fifty New Churches Act 1711. Other notable names who built churches under the act were James Gibbs, John James, Thomas Archer and Henry Flitcroft. Hawksmoor was a senior when he undertook the designs for the church, with some thirty years of experience behind him. Construction of St George's began in 1716, the same time as St Mary Woolnoth also by Hawksmoor. St George's is unique in showing the first example of a six-column Corinthian portico in a London Church with Pevsner suggesting that it may perhaps be the most grandiose of the 18th century London churches.

Within the Townscape, Visual Impact and Heritage Report provided as part of the application only a selection of nearby heritage assets have been further explored for potential impacts on their setting. In the view of the Group the applicant's assessment needs to be broadened in order to assess views from Russell Square, Coram Fields and Lincoln's Inn Fields. A further point will be made on this in the next sections.

Proposal

The application for Planning Permission proposes to redevelop the existing site through the refurbishment of the existing buildings fronting New Oxford Street and Museum Street. To the south of the site is Selkirk House which is to be demolished and replaced with a building rising to 21 storeys. A description of the proposal can be found at the head of this letter.

The Georgian Group Advice

As the application stands the massing and height of the proposed development would cause significant harm to the significance of several designated heritage assets, along with the Bloomsbury Conservation Area. The significance of those assets has been alluded to in the previous section, as has the contribution they collectively make to the wider Bloomsbury Conservation Area. Identified in the previous section are further areas and assets the applicant needs to address within their visual impact assessment before this application is determined.

This section will set out specifically how the proposed development, due to its height and massing, will cause significant harm to the surrounding heritage assets. Russell Square is included within the applicant's visual impact assessment where the new 21 storey building is shown behind the east terrace. The chosen positions within the square are from the north and south where the impact the new building will have on the eastern terrace and the setting of the square can be seen. When positioned within the square, one can appreciate the near uniformity of the terraces with the backdrop of a clear skyline. The proposed plans alter this and harm the significance of Bedford Square. Camden Council has most recently approved consent for a six-storey building in the setting of the western terrace of the square, the cumulative impact of these tall buildings in the setting of the square should be considered by your Local Authority.

The forecourt of the British Museum forms part of the setting of the building and provides a space to experience the impressive exterior. When positioned within the portico and colonnade of the museum and looking south, the character of the surrounding area can be appreciated and enhances the setting of the building. The introduction of the 21-storey building can clearly be seen rising above the buildings on Great Russell Street and would harm the significance of the British Museum.

The applicant has provided views towards St George's Church from Little Russell Street but not from within the Corinthian portico located on Bloomsbury Way. The Group has visited the church and the new development would be clearly visible when positioned within the portico looking south, this would largely conceal the portico from surrounding light and harm the setting of the church.

Within the previous section, specific areas were highlighted where the Group would expect the applicant to assess as part of their visual impact assessment. Your local authority should ensure that these are provided as the whole of the Bloomsbury Conservation Area is of particular interest due to the relationships between the existing garden squares and those that do not remain in their original formation.

Recommendation

The Georgian Group objects to this application for Planning Permission on Heritage Grounds and recommends your Local Authority refuse permission. As the application stands the proposed height and massing of the 21-storey building would cause significant harm to several heritage assets and conservation areas. It does not currently meet the requirements set out within paragraph 194, 195, 199, and 200 of the revised version of the National Planning Policy Framework. Neither does it address the statutory considerations set out in sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

Paragraph 194 of the NPPF requires 'an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of the level of harm. The more important the asset, the greater the weight should be (paragraph 199). Paragraph 200 of the NPPF stipulates that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification....'

Your Local Authority should be minded to abide by the policies set out within the London Plan - especially Policy HC1 section C which states 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'

Furthermore, the following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'.

Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.'

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

Finally, The Group would like to remind your local authority of its obligations in line with section 66 (1) and 72 (1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting; and in reference to conservation areas (section 72), that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Your Authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,

Edward Waller (Conservation Adviser for South East England and London)