



Mr David Fowler
London Borough of Camden
Development Management
Town Hall
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Direct Dial: 020 7973 3774

Our ref: P01433302

4 August 2021

Dear Mr Fowler

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**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
Application No. 2021/2954/P**

Thank you for your letter of 12 July 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Bloomsbury is one of London's most distinctive and special historic places, characterised by its world-renowned network of formal streets, garden squares and architectural set pieces of the late Georgian period. Much of this historic area is low lying, with the most dominant buildings being late Georgian terraces and historic institutions. The application site is mostly outside the conservation area boundary, but contains a post-war tall building that, despite being located just outside the historic core of Bloomsbury, forms an incongruous backdrop to it, thereby harming this part of London's cherished identity and sense of place.

Although the current application proposes some positive changes to public realm and some unlisted buildings, these benefits would be greatly outweighed by serious harm to the significance of the surrounding conservation area and Bloomsbury as a significant historic place, through demolition, extensions to existing buildings and, in particular, the provision of a replacement tall building which would be markedly taller than the existing Selkirk House and surrounding heritage assets.

Such a notable contrast in height would draw unwelcome attention to the alien form of this proposal in this place, causing considerably more harm to the special character and appearance of Bloomsbury than the existing Selkirk House. The effects of the



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replacement building would also be far-reaching, causing harm to the significance of some of central London's most important historic buildings due to the impact on their settings.

Historic England therefore strongly objects to the current application and recommends that it should not be approved in its current form. We urge you to seek amendments to the scheme to avoid the serious harm it would cause, principally including a meaningful reduction in the height of the proposed tall building.

Historic England Advice

Significance

Bloomsbury, with its formally laid out streets and squares, late Georgian terraced housing and cultural institutions, is one of London's most distinctive and special historic places.

This part of Bloomsbury, where it joins Holborn, developed during the 1840s with the creation of New Oxford Street as part of James Pennethorne's urban interventions. Remnants of this are apparent within the northern part of the development site, which is within Bloomsbury Conservation Area. The block formed by West Central Street, New Oxford Street and Museum Street contains fine examples of the 1840s classical style buildings associated with Pennethorne's work.

The best of these, such as Nos. 43 and 45 New Oxford Street, are listed, but the site also contains some important unlisted buildings of the period, such as Nos. 10-12 Museum Street, that display the same architectural detailing: rendered elevations; decorative moulded window surrounds; prominent projecting cornices. The two-storey range at Nos. 16a-16b West Central Street appears to be a former stable block or other lower status building to the larger New Oxford Street frontage buildings, but also displays some of the same detailing and therefore contributes positively to the conservation area.

The development site to the south is dominated by Selkirk House, a poor-quality tall building from the 1970s (currently in hotel use), which is excluded from the conservation area.

In summary, this part of the conservation area is significant principally for its surviving Victorian buildings that are architecturally important individually but collectively illustrate an important period of London's urban expansion. It is close to the historic core of Bloomsbury with its world-renowned network of planned streets and squares, late Georgian terraced housing and important cultural institutions. In the heart of Bloomsbury, and within the visual sphere of influence of the application site, is Bedford Square. Planned and built from 1775-83 and largely intact, the square is amongst the





capitol's finest examples of Georgian town planning and domestic architecture. As such it is of extraordinary importance.

Much of this historic area is characteristically low lying. It is important to recognise that in terms of heritage significance, the Bloomsbury Conservation Area is one of the most important in London.

Also in the setting of the application site are important heritage assets set further afield. These include Somerset House, one of the finest Georgian public buildings in London, in the from the South Bank (LVMF16A.1), and the Palace of Westminster when viewed from Lambeth Bridge (LVMF 10A.1). This view is a Protected Silhouette, and one of the views that best captures the extraordinary architectural and historic significance of Charles Barry's neo-Gothic masterpiece. The Palace is also integral to the Outstanding Universal Value of the World Heritage Site.

The Proposals and their impact

In broad terms, the proposals are to retain the facades of and extend the best of the unlisted Victorian buildings within the north part of the site within the conservation area. A large modern roof extension is proposed for the unlisted 1840s building at Nos. 10-12 Museum Street, which contrasts with the traditionally designed roof extensions to the Victorian and Art Deco frontages at Nos. 35-41 New Oxford Street. The later Victorian buildings at Nos. 16a-16b West Central Street are proposed for demolition and replacement.

To the south, outside the conservation area, Selkirk House is proposed to be replaced with a 20-storey commercial office tower.

Throughout the site, the development would result in some improvements to the existing urban realm and permeability, including completing the frontage to Grape Street.

However, the demolition of Nos. 16a-16b would harm the significance of the conservation area due to the loss of a building that contributes positively to that significance. The proposed roof extension to Nos. 10-12 Museum Street would result in a visual clash of architectural styles and in buildings with a top-heavy appearance. It would consequently cause some harm to the special character and appearance of the conservation area.

The proposed tall building in particular, due to its height and scale, would have a major, harmful, impact on Bloomsbury Conservation Area due to the marked contrast in scale and introduction of an alien form that would exacerbate the incongruous backdrop already created by Selkirk House. Whilst the proposed tower is not within Bloomsbury Conservation Area itself, its presence would have a major impact on





some of the most important elements of this large and highly significant historic place.

This impact would be evident in important views that illustrate the area's special character. In the view south from the British Museum, the proposed tall building would rise above the low lying historic roofscape, visually competing with the delicate silhouette of the late Victorian mansion block and dominating the lower and more formal mid-Victorian stucco blocks laid out by Pennethorne.

In the view from Bedford Square, the strong horizontal roofline of the east side of London's best preserved Georgian Square (comprised of buildings that are nearly all listed at Grade I) would be interrupted by the vertical form of the proposed tall building, thereby harming the balanced and symmetrical character of the square and this part of the conservation area and harming the significance of the individual listed buildings.

The proposal would also have impacts on listed buildings further away.

The proposal would harm the significance of the Grade I listed Somerset House by appearing within its setting. The new development would rise above the long and imposing 18th century river frontage in the view from the South Bank (LVMF View 16A.1), interrupting its largely consistent neo classical composition.

In the Lambeth Bridge view of Westminster Palace (LVMF 10A.1), the development would appear against the finials of the northern end of the Palace. Whilst the visible amount of new development would be small, it would affect the protected silhouette of the Palace and thereby harm its significance through development within its setting.

Major impacts such as these described here can progressively and fundamentally erode the character of conservation areas and the significance of nearby listed buildings, and it is important to recognise therefore that the harm identified above is a very serious issue. Robust justification for any such harm is required under national planning policy.

Policy

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed buildings or their settings.

Section 72 of the Act requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of



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'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 190 that local authorities, which considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal.

Paragraph 199 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance (the more important the asset the greater the weight should be) irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm or loss should require clear and convincing justification (para 200).

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. The phrase "less than substantial harm" describes all harm that is not "substantial". This encompasses a wide range of harm from the very minor to the extremely serious. Any finding of harm is a consideration to which the decision-maker must give "considerable importance and weight" (irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance) and "less than substantial harm" in NPPF terms does not imply "a less than substantial objection".

If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Position

We acknowledge that this part of Bloomsbury Conservation Area was blighted by the construction of Selkirk House and has since been neglected and undermaintained. We therefore welcome the proposed repair of most of the Victorian elevations on the north part of the site, and the improvements to the public realm.

However, these positive elements would, in our view, be thoroughly outweighed by the serious harm caused by the proposal to Bloomsbury Conservation Area and other heritage assets through the impact on their settings. These assets are of the highest significance and amongst the most important in London. The level of harm caused to them is a very serious concern for Historic England and in our view should not be accepted.

For the purposes of the NPPF, we judge the harm to Bloomsbury Conservation Area



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to be in the middle-high range on the less than substantial spectrum, and the impact on the significance of the listed buildings described above to be in the middle range of the spectrum.

This harm is contrary to the intent of the Framework's policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF paragraphs 199). Given that the assets affected in this case include some of the most important in London, the greatest possible weight should be given to their conservation.

Such harm also requires clear and convincing justification, and should not be accepted unless your authority concludes that there is such demonstrable justification and that the harm would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 199, 200, 202).

Based on the current submission, Historic England is not persuaded that the justification for the harm has been demonstrated, or that significant public benefits could not be achieved with a scheme that causes much less harm to heritage significance.

We therefore strongly object to the proposals in their current form. We would welcome the opportunity to consider revisions to the proposal, focused particularly on reducing the height of the tall building. Such revisions should be substantive if they are to preserve the character of the conservation area and avoid the harm to the prospect from the British Museum, the significance of Bedford Square and to the significance of both the Palace of Westminster and Somerset House.

Recommendation

Historic England objects to the application on heritage grounds.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.



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Historic England

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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