

City Hall  
The Queen's Walk  
London SE1 2AA

Email: [anne.clarke@london.gov.uk](mailto:anne.clarke@london.gov.uk)  
Telephone: [REDACTED]  
Twitter: @Anne\_Clarke

LONDON ASSEMBLY LABOUR



**Anne Clarke AM**

To Whom it may concern,

**Date:** 12 August 2021

**Re: 2021/2954/P, 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**

I am writing to object to the above application in my role as London Assembly Member for Barnet and Camden.

#### **Housing**

This proposal fails to comply with Camden's policies (H1 and H2) with regard to the quantum of affordable and social rented accommodation that should be provided, and also the overall quantity of housing, including private accommodation. The developers propose 29 flats, of which 17 are private and 12 are affordable/social rent, which is well short of the minimum housing requirements and certainly is not compliant to the policy requirements. If the 11 flats currently within Selkirk House are brought into the equation then there should be around 49 flats onsite, of which 19 should be affordable/social rented.

In addition, the design and quality of the housing and location of the social/affordable element is compromised by the office block proposed opposite. The height, length and bulk of the office tower block will imply that for almost the whole of the year all the accommodation proposed on the north side of West Central Street will be denied direct sunlight and 90% of the year will be in the shade of the office block. The feeling of being overwhelmed by the office tower will be immense, and the proposed private open space for residential dwellings located at first floor level within the Central St/High Holborn block will certainly always be in shade. Being surrounded by buildings of up to 6th floors in height and the 22 storey 80m high office tower (with windows looking directly into the housing only 12m away on the other side of West Central Street). This 'amenity' space will not be a play area as it provides access to the rear entrance to the accommodation.

So the housing provision is much too little and the quality of housing is poor. The lack of good open space tied to the housing fails to meet Camden policies and will result in very poor housing and housing amenity.

#### **Design and height of the proposed office tower**

The height, design and bulk of the new office tower is completely contrary to Government planning policy guidance and completely contrary to Camden's Design Policies D1, as detailed below:

#### CAMDEN LOCAL PLAN 2017

##### Policy D1 Design

The Council will seek to secure high quality design in development.

The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Tall buildings All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and

t. the contribution a building makes to pedestrian permeability and improved public accessibility. In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

#### Camden Plan (Heritage)

7.39 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see Map 4: Heritage and Archaeological Sites on page 234). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.

**Policy D2 Heritage** The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

**Designated heritage assets** Designated heritage assets include conservation areas and listed buildings.

The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

**Conservation areas** Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
  - h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.
- 236 Camden Local Plan | Design and Heritage Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building; j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- ii. resist development that would cause harm to significance of a listed building through an effect on its setting.
- iii. Archaeology The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- iv. Other heritage assets and non-designated heritage assets The Council will seek to protect other heritage assets including non designated heritage assets (including those on and off the local list),
- v. Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset

The GLA's recent tall building policy (D sub-section C Tall Buildings) also states:

GLA Impacts C Development proposals should address the following impacts:

"d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area."

The tower will damage the setting of numerous listed buildings in the immediate vicinity by impacting their visual setting and aspect, compromising the unique qualities of three grade 1 buildings and architectural set pieces (The British Museum, St George's Church and Bedford square) a set piece of such architectural importance that not only are all the buildings within the square listed but the square as a whole is listed grade 1. A tower block as proposed rising some 40 m higher than the existing Selkirk House tower would have a severe detriment to the heritage of the area.

The tower is surrounded by three Conservation Areas and all will be adversely affected; Covent Garden and Seven Dials, Bloomsbury and Soho. Strategic and protected views such

as Horse Guard Parade, the South Bank views north, views from the bridges over the Thames and from the south side of the Embarkment will all be adversely affected.

Also of concern in the application documents is the lack of views from the many important viewing points. None shown from Lincoln's Inn and Lincoln Inn Fields from The John Soane Museum (also listed Grade 1), Shaftesbury Avenue, Bedford Square walking down Bloomsbury Way, Russell Square, Boomsbury Square, from the steps under the portico of St George's Church, none from the forecourt of the British Museum and none from the steps under the portico of the British Museum (there is only one view from the BM at ground level in front of the main entrance door where the vantage point is very contrived, and absolutely none from any vantage points/important views from Westminster, Horse Guards Parade, Oxford St etc.

Also all the buildings in the block between West Central Street and New Oxford Street are proposed to be being demolished (four facades are to be kept in Museum Street) which is against Camden's planning policies on development within a Conservation area; this part of the development site is within the Bloomsbury Conservation area sub area 8.

**Bloomsbury Conservation area extract :**

(Nos 33 and 45) marking either end like flanking columns. 5.128 Immediately behind these buildings in Museum Street and West Central Street are some smaller-scale somewhat utilitarian mid 19th century buildings of group value in conservation area terms. West Central Street takes its name from the former late 19th century 'West Central' post sorting office which stood in the vicinity. However, the grade II listed No 16 West Central Street, a long two-storey building to the rear of No 45 New Oxford Street, was part of the Castle Brewery until the mid-19th century and its surviving structure may predate New Oxford Street. Subservient in height to the corner building at No 45 New Oxford Street, it is now in a similar style and materials, and was probably refronted in stucco when the frontage building was constructed, with later alterations including early 20th century steel casement windows; up to the end of the 19th century it was utilised by Marshall and Elvy, Spirit Distillers. It should be noted that these buildings are located adjacent to the southern boundary of Bloomsbury Conservation Area; the neighbouring buildings immediately outside the boundary are of a scale and design which harms the setting of these buildings and the wider Conservation Area. However, West Central Street benefits from views north of New Oxford Street towards the more intact streetscape of Museum Street, with glimpse views of the British Museum.

If the existing Selkirk House harms the quality of this part of the conservation area, the proposed replacement 40 m higher and much bulkier will do even more damage,

Map of Sub area 8

<https://www.camden.gov.uk/documents/20142/7239578/Bloomsbury+CA+Sub+Area8+To+wnscape.pdf/afb3881d-78a6-3df1-6fc0-6f5d8b6b0f01>

Open Space

The developers make great play that their landscaping proposals at street level meet the requirements in Camden's Local Plan. They are offering a small 'pocket park' some 30 sqm along West Central Street towards their Vine Lane proposal that will contain a bench and a tree.

Otherwise the public open space provision is in fact not public nor open space. Vine Lane will be gated and is just a hard passageway with 6 storey buildings either side and 5-7m wide and all the images of this proposal shows a French-styled cafe society whereas the reality is a commercial passageway that comes from nowhere and leads nowhere exiting to High Holborn a very wide four lane road without any crossings.

This Vine Lane is certainly not as the developers claim a natural linkage connecting Covent Garden to The British Museum; rather it is a commercial device to increase the commercial frontage to their development which is likely not to be used and may create anti-social behavior issues..

Moreover Vine Lane completely ignores the historical street development and typography of the site. There never has been any lane leading from New Oxford St down to High Holborn. So rather than enhancing the historical street pattern of the area and stitching together the damage done by Selkirk House Car Park ramp it does the opposite. It imposes an unwanted overshadowing.

The office block propose contains approximately 24,876 sq m of new offices. Camden's Open Space policy A2 calls for the provision of additional public open space to be provided as a consequence of large-scale commercial development. They set out very clearly in Appendix F Public Open Space Supplementary Guidance 2021 how this is to be calculated. In this instance the increase in office floorspace is 24,876 sqm the required new public open space calculation is arrived at by calculating the increase floorspace x 0.74 divided by 12 so in this case 1,534 sq m of public open space should be provided.

The proposed scheme does not provide this; the developers rely entirely on new landscaping of the existing pavement and roadways - as though they are their property and in their ownership. The roof terraces they propose on Selkirk House are private and certainly not open to the public. As shown by the adjoining Post House development and many office towers in the city it is possible to provide public open space at roof level but none is suggested indeed they say it is not possible.

Another objection to the proposal is that it will seriously erode the quality of the existing hard fought for public open space provision on the top of the Post Building as the additional 40m height will put all of the street level areas around the proposed development in the shade most of the year and also the open space at roof level of the Post House. Most importantly the proposed tower will also completely remove the views from the Post House looking west.

### **Sustainability**

To pull down a structurally sound building releasing massive embedded carbon and then constructing another steel and concrete tower block is clearly not sustainable and contrary to both GLA and Camden's Climate Change policies. The developers claim they cannot retrofit the existing building but all their evidence merely endeavors to show that office use is the only use the site can be put to. Their scheme is driven by a demand for 24,500 sq m of offices that must be provided.

They dismiss hotel use (the last use of the building) saying there is no market, but this is demonstrably not the case as shown by the recent efforts by developers to demolish the Odeon Theatre in Shaftesbury Avenue less than 200 meters away from Selkirk House, to make way for a new hotel. Clearly there is a market which is recognized in Camden Local Plan where the plan encourages such a use in the Central Area.

Thankfully the recent enquiry decision into the Odeon Cinema ex Saville Theatre in Shaftesbury Avenue found against the developer on the basis that the proposals would be too damaging to the listed building and the wider conservation area but notably not because of the proposed use proposed for the building was inappropriate.

Therefore I urge this application is refused.

Yours sincerely,

A solid black rectangular box used to redact the signature of Anne Clarke AM.

**Anne Clarke AM**

Labour and Cooperative London Assembly Member for Barnet and Camden