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2021/2954/P

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Formal Objection to Application 2021/2954/P for the Redevelopment of Selkirk House and Surrounding Buildings.

This objection is submitted on behalf of the Bloomsbury, Seven Dials, Denmark Street, and Hanway Street Conservation Area Advisory Committees. We object to this application in the strongest possible terms on the grounds of unacceptable harm to the significance of both conservation areas without sufficient public benefits to outweigh that harm.

Townscape Character and Heritage Significance

The site is located on a busy and densely developed east-west thoroughfare at the intersection of Bloomsbury, Covent Garden, and Denmark Street, with a number of historic and contemporary buildings of relatively large scale reaching up to around ten storeys in height. The irregular street pattern results in street blocks of unusual shape with development typically occupying the full plot resulting in architecturally notable corner buildings (*vis.* 10 Bloomsbury Way and Commonwealth House). These visually prominent sites have resulted in development of high design quality contributing to a townscape of high architectural significance. Among these buildings of large scale there are also domestically-scaled Victorian terrace buildings dating from the construction of New Oxford Street, and where these survive they are of high heritage significance as reflected by their Grade II and II* listings.

Despite the range of architectural styles and expression there is a sense of unity lent to this area through a common material palette consisting mainly of brick and Portland stone, a traditional solid-to-void ratio, sympathetic massing at upper storeys, and general uniformity in building heights and massing choices.

The immediately surrounding areas in Covent Garden, Bloomsbury, Denmark Street, and further afield are characterised by a much finer grain of domestically-scaled development, a reflection of the medieval origins of the townscape to the south and later Stuart and Georgian development towards the north. These areas were originally largely terraced housing of 2-5 storeys in height,

and where these terraces remain they are of high or exceptional heritage significance as reflected by their Grade I, II*, and II listings. There is a high proportion of very well-preserved Victorian, Edwardian, and later housing block developments which make an essential contribution to the significance of the surrounding conservation areas. There is also an unusually high density of Grade I and Grade II* listed public buildings such as St George's Bloomsbury, the British Museum, and Senate House Library.

Overall, the surrounding townscape comprises a high density of development of high or exceptional heritage significance, forming the main core of London's Georgian expansion towards the north and later Victorian redevelopment. The area is clearly of national heritage significance as reflected by the high proportion of designated heritage assets, many of which are of national significance in their own right. Given its essential place in the historic evolution of London as a city and high level of preservation, the surrounding townscape should rightly be regarded as being of international heritage significance.

Impact of Proposals Upon Significance

The primary impact upon the significance of the surrounding heritage assets is caused by the scale, massing, and design of the proposed tower, while proposed alterations to the block of buildings immediately to the north of Selkirk House are also entirely inappropriate and without justification or precedent.

Selkirk House Tower

The existing Selkirk House is acknowledged as causing harm to the surrounding historic townscape through poor design and inappropriate scale. The proposed replacement tower is of a far greater height at around 90m and of an exceptionally poor design, drawing no design precedent whatsoever from the surrounding townscape, nor making any effort to appear subservient or respectful of the number of listed buildings in its immediate and wider vicinity.

In our view the proposed development causes such a high level of cumulative harm to surrounding heritage assets that it is difficult to quantify this harm comprehensively. The principal cause of harm is caused through an wholly unprecedented invasion upon the setting of listed buildings and undesignated heritage assets throughout Central London and beyond, along with a significant disruption to the historic townscape of the Bloomsbury and Seven Dials Conservation Areas.

Bloomsbury Conservation Area

At a height of about 90m the tower would be far taller than any other building in or within the immediate setting of the Bloomsbury Conservation Area. Other tall buildings in or on the border of the Bloomsbury CA include Senate House Library (64m) and St Pancras Station (76m). The only building of comparative height is Centre Point (117m); this building stands as a lone example of a tall office complex in this area of Central London. The approval of this application would therefore represent a significant departure from the accepted scale of modern development throughout the entirety of the Bloomsbury Conservation Area, causing harm to the architectural and historic significance of the CA as a whole. Given its marked departure from the accepted scale of modern development throughout this area, a strong precedent would also be set for the construction of similarly tall buildings in the immediate vicinity and wider conservation area. Such a precedent

clearly has the potential to cause substantial harm to the conservation area, and this precedent must be afforded great weight given the exceptional significance of the Bloomsbury CA.

Listed and Undesignated Heritage Assets

The proposed tower would be visible from an extraordinarily wide area as evidenced by the Zone of Visual Influence submitted as part of the application. This will cause varying degrees of harm to a large number of listed and unlisted heritage assets, many of which are of exceptional significance in their own right. The setting of Grade I listed Bedford Square would be significantly affected by the uplift in scale and offensive design, along with the Grade I listed St George's Bloomsbury, British Museum, and a number of Grade I, Grade II*, and Grade II listed heritage assets at Lincoln's Inn Fields, Russell Square, Bloomsbury Square, and even as far as St George's Gardens and Gordon Square.



All of these heritage assets are of exceptional or high significance in their own right, but cumulatively they also form some of the most essential aspects of the significance of the Bloomsbury Conservation Area as a whole. Bedford Square, Russell Square, and Bloomsbury Square are three of the most important and well preserved Georgian squares in Bloomsbury and Central London and these are particularly affected by the uplift in scale.

It is our view that through the immediate impact of the proposed tower upon the surrounding townscape, the cumulative impact upon a wide range of listed buildings and protected open spaces throughout the entirety of the Bloomsbury CA, and the precedent set for a significant uplift in scale throughout the surrounding area and wider conservation area, the proposal would cause substantial harm to the significance of the Bloomsbury CA as a whole.

Alterations to Museum Street Block

It is our strongly-held view that the alterations proposed to the 'Museum Street Block' of buildings facing New Oxford Street are completely unacceptable in planning terms and any alterations to these buildings, given their distinct architectural character, should be submitted as a separate planning application. When taken in their own right, the proposed rooftop extensions to the buildings on West Central Street are of the poorest and most offensive design possible to buildings of this type and would typically be refused without further consideration. Should LB Camden be minded to approve this application, significant revisions should be sought to maintain the integrity of this important group of historic buildings.

High Holborn Building

In our view the High Holborn Building is of an appropriate scale but is of an exceptionally poor design and would likely not be approved under normal circumstances. The massing and articulation of the façade is poorly proportioned, and the proposed use of glass reinforced concrete for the façade is similarly entirely inappropriate and without precedent.

Conclusion

While it is recognised that redevelopment of any major site comes with an associated intensification of use and an uplift in scale, the proposed extent to which the tower is being increased in height is unacceptable and will lead to a strong and lasting precedent for inappropriate redevelopment of similar existing tower sites throughout the area. This increase in height causes the proposed tower to be visible from a large area, including within the setting of a large variety of designated heritage assets of low to the highest significance. While it is understood the developer seeks to create a 'marker building', where marker buildings have been successful in London it has been due to innovative and recognisable design (Gherkin, Shard, etc). The proposed design is of no interest and will contribute positively neither to the historic nor modern skyline of London. The poor design further exacerbates the negative impact this tower has upon the wide variety of views within the historic environment. The proposed alterations to the block of historic buildings fronting onto West Central Street and New Oxford Street are in themselves completely inappropriate and should be accepted under no circumstances. For these reasons we object in the strongest possible terms to this application.

Bloomsbury Conservation Areas

Advisory Committee