

David.fowler@camden.gov.uk

Your reference: 2021/2954/P
Our reference:

19th October 2022

Dear Mr Fowler,

RE: 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.

The Victorian Society has been alerted to amendments to this application. While we recognise that further alterations have been made to the proposed design, namely the reduction in height of the proposed tower by two storeys, this does not in any answer our previous concerns. Therefore, we maintain our **objection**.

The Victorian Society submitted letters of objection to this scheme on 22nd March and 15th July 2021. We also wrote in January of this year expressing our concerns with the Draft Site Consultation for Camden and Holborn and its proposed policy concerning this site.

We repeat our previous comments below:

Selkirk House

As stated in our previous responses Selkirk House is a building which harms the setting of the Bloomsbury Conservation Area. This is clear in the Conservation Area appraisal which states: *“the neighbouring buildings immediately outside the boundary are of a scale and design which harms the setting of [West Central Street] buildings and the wider Conservation Area.”* As such, the proposed redevelopment of Selkirk House offers a special opportunity to undo this harm and contribute positively to the setting of the Conservation Area. In all our previous responses we have maintained

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that the proposed building, which is taller than the existing Selkirk House, would increase this harm.

Despite the amendments to the proposal which reduce the height by two storeys, the proposals continue to be harmful to the setting of the Conservation Area and fail to take advantage of the opportunity afforded by redevelopment of the site. The consultation website (<https://onemuseumstreet.com/>) states that the amended height would reduce the *'impact of the tower on key London skyline views.'* However, it will increase the impact when compared to the existing building. The amended proposal continues to be substantially taller than the buildings immediately surrounding it, and, if built, could form a precedent for other unsuitably tall buildings in the area and bordering the Bloomsbury Conservation Area.

Any acceptable proposal must be of scale which is sensitive to the surrounding urban fabric and the character of the Bloomsbury Conservation Area.

We also continue to have serious concerns regarding the sustainability of the proposed demolition and new construction. Existing buildings, and especially concrete ones, contain a high level of embodied carbon and new construction is one of the highest contributors to the UK's carbon footprint. The consultation website lists several justifications for the continued proposal to demolish the existing buildings. However, they remain unconvincing. Is the removal of the existing ramps or their inclusion in the redeveloped building completely impossible? The statement that the existing column spacing would not give a commercially competitive space show clearly that profit is trumping environmental concerns.

Camden declared a climate emergency in 2019 and should be encouraging development which is environmentally responsible.

Remainder of the Proposed Site.

We continue to welcome the restoration of the shop facades on New Oxford Street. However, our other concerns remain. The roof extensions on the buildings on New Oxford Street continue to be excessive and harmful to the impressive facades. To reduce the harm of the overall scheme we continue to recommend their removal.

It also appears that the same level of demolition is proposed for the buildings along West Central Street, with only the retention of some facades. We maintain that this is an unsuitable approach within a Conservation Area and the proposals in this part of the site must be more sensitive. The existing historic fabric must be respected and the positive contribution these buildings make to the Conservation Area through their individual character should be enhanced.

We also note that one of the buildings on West Central Street was home to a noted music venue 'The End' (later known as 'The Den'). The proposals would see the loss of a space suitable for music or other cultural uses. The London Plan 2021 is clear that development should *'protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres.'* (Policy HC5) and that *'boroughs should protect such cultural facilities and uses, and support alternative cultural uses, particularly those with an evening or night-time use,'* (7.5.6). The proposal would not see such a venue protected.

We also reiterate our comments regarding the proposed reinstatement of Vine Street. The proposed residential building flanking the Cuban Embassy would negate any possible benefits and the infill building on West Central Street would continue to be of a scale unsuitable for the site.

Policy

Paragraph 206 of the NPPF states that: *'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'* Despite amendments this proposal still fails to enhance the setting of the Bloomsbury Conservation Area (a designated heritage asset) and would rather increase the harm already caused to the setting.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill
Conservation Adviser