



Historic England

Mr David Fowler  
London Borough of Camden  
Development Management  
Town Hall  
Judd Street  
London  
WC1H 9JE

[REDACTED]  
Our ref: P01433302

3 November 2022

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 30 September regarding further information on the above application for planning permission. On the basis of this information, 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 particularly 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 partly within the conservation area boundary, but also contains a post-war tall building that, despite being located just outside the conservation area and historic core of Bloomsbury, forms an incongruous backdrop to it, thereby harming this part of London's special identity and sense of place.

We acknowledge that the current proposal avoids some of the harm we identified in the previous scheme in relation to impacts in the LVMF views towards Somerset House and towards the Palace of Westminster, and offers positive changes to public realm and some unlisted buildings. However, these benefits need to be weighed against the remaining harm to the significance of the surrounding conservation area and Bloomsbury as a highly significant historic place, through demolition, extensions to existing buildings and, in particular, the provision of a replacement tall building. That replacement building, though reduced in height from the previously submitted scheme,



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would be notably taller than the existing Selkirk House and surrounding heritage assets.

This means there would still be a marked contrast in height and bulk compared to the surrounding context, so we remain very concerned about the harm that would result to the special character and appearance of the Bloomsbury Conservation Area and to some specific heritage assets within it.

Historic England has recently received an external request to list some of the Victorian buildings on the site. The assessment is currently ongoing but does not affect the advice set out here.

### **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. In terms of heritage significance, the Bloomsbury Conservation Area is one of the most important conservation areas in London.

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. These buildings are currently being assessed for listing following an external request.

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; and prominent projecting cornices. The two-storey range at Nos. 16a-16b West Central Street appears to be a former stable block or other ancillary building to the larger New Oxford Street frontage buildings. It 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, but which forms an incongruous backdrop to it.

In summary, this part of the conservation area is significant principally for its surviving Victorian buildings that are architecturally important individually, and collectively illustrate an important period of London's urban expansion. It is on the edge the



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historic core of Bloomsbury with its world-renowned network of planned streets and squares, late Georgian terraced housing and important cultural institutions. The existing tall building, which is outside the boundary of the conservation area, is nevertheless visible from numerous vantage points within Bloomsbury Conservation Area, most notably from Bedford Square and the British Museum. Much of this historic area is otherwise characteristically low lying, and in this context this tall building appears incongruous both in terms of its height and poor architectural quality.

#### The Proposals and their impact

In broad terms, the proposals are to retain the facades of and extend the best of the (currently) unlisted Victorian buildings within the northern part of the site, which is 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 commercial office tower, the height of which has been reduced from 80.2 metres (previously submitted scheme) to 73.9 metres (current amended proposal), but its floorplates have been increased so that the overall quantum of new accommodation would be the similar to the previous proposal.

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

Despite the acknowledged poor condition and partial modern rebuilding of Nos. 16a-16b, their demolition 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 also result in a visual clash of architectural styles between the historic building below and the new work above. It would consequently harm the special character and appearance of the conservation area.

The proposed tall building, despite the recent reduction in height, would still have a marked impact on Bloomsbury Conservation Area through the contrast in scale and exacerbation of the visual discordance of Selkirk House. Whilst the proposed tower is not within Bloomsbury Conservation Area itself, its presence would have a major negative impact on some of the most important elements of this large and highly significant historic place.

This impact is especially evident in important views that illustrate the area's special character. In the view south from the British Museum, the proposed tall building rises



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above the low-lying historic roofscape, visually competing with the delicate silhouette of the late Victorian mansion block and visually 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 Grade II listed late Georgian buildings of Bloomsbury Street, just south of London's best preserved Georgian Square, would be interrupted by the vertical form of the proposed tall building. As a result, the balanced and symmetrical character of the Georgian townscape of this part of Bloomsbury would be affected, causing harm to the significance of both the conservation area and the individual listed buildings within it.

#### 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 and 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 '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, when 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. In practice that means that less harmful alternative solutions should be fully explored before any application for the current scheme is determined.

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 severe. Any finding of harm is a



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consideration to which the decision-maker must give “considerable importance and weight” 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 outweighed by the harm that would be caused by the proposed tall building to Bloomsbury Conservation Area and other important heritage assets, both through physical impacts and indirect impacts on their settings. For the purposes of the NPPF, we judge that this harm to Bloomsbury Conservation Area and the listed buildings along Bloomsbury Street would be less than substantial and in the low-middle part of the range of such harm. Great weight should be given to the conservation of these assets, irrespective of the level of harm caused, recognising in particular that the Bloomsbury Conservation Area is one of the most important conservation areas in London and should therefore be afforded particularly great weight.

It is worth noting that Historic England’s advice on the previously submitted proposal was that a reduction of three or more storeys could meaningfully reduce the impact. The current amended proposal is for a reduction of two storeys, which has helped to avoid harm to more distant heritage, but which has not avoided harm to the conservation area and important heritage within and close to it. The increase in the proposed tower’s footprint negates some of the reduced harm to the conservation area through the removal of the top two storeys.

Such harm should not be accepted unless your authority is persuaded that the harm has been avoided or minimised and that there is clear and convincing justification for the harm, including that it would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 199, 200, 202).

While it will be for your authority, not Historic England, to carry out this balancing judgement, the issues raised here must be given great weight in the overall planning balance.

Historic England remains very concerned about this proposal and recommends that permission should be refused unless you are persuaded that the harm has been minimised and that there is clear and convincing justification for the remaining harm to



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one of your most important conservation areas.

### **Recommendation**

Historic England has concerns regarding 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 there are any material changes to the proposals, or you would like further advice, please contact us.

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.

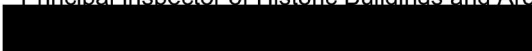
The full GLAAS consultation criteria are on our webpage at the following link:

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

Yours sincerely

**Michael Dunn**

Principal Inspector of Historic Buildings and Areas



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Application No. 2021/2954/P**

Thank you for your letter of 13 February 2023 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

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.

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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Principal Inspector of Historic Buildings and Areas  
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