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## 1 MUSEUM STREET, LONDON WC1A 1JR

**Proposal:** 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.

Application for planning permission: 2021/2954/P

4 August 2021

**Save Museum Street**, which comprises the organisations listed below, objects to this application and a summary of our concerns follows. These are set out in the following sections:

- 1 Sustainability, environmental, climate emergency
- 2 Housing
- 3 Visual and heritage impact
- 4 Design quality
- 5 Community engagement
- 6 Sunlight and daylight
- 7 Open space and public realm
- 8 Basement impact
- 9 Transport, access and servicing
- 10 Construction management and noise
- 11 Hotel Use
- 12 **Addendum:** Policy non-compliance / information required

The Save Museum Street Group is strongly of the opinion that the proposal is wrongly conceived and fundamentally flawed. It will be severely damaging visually and environmentally not only to its immediate surroundings of sensitive conservation areas but to the whole of London. The scheme as it stands is not susceptible to improvement to an acceptable level by the merely cosmetic measures of increasing the number of housing units, which are of poor quality, or reducing the height of the tower. What is required is a root and branch approach to create a design brief which is sensitive to the location, the needs of the community and the implications of climate change.

**Save Museum Street Campaign: led by a community coalition including:**

Bloomsbury Association  
Covent Garden Community Association  
Tavistock Chambers Residents' Association  
Willoughby Street Residents' Association  
Leicester Square Association  
Charlotte Street Association  
Covent Garden Area Trust  
South Bloomsbury Tenants & Residents' Association

West Central Street Residents  
Grape Street Residents  
Drury Lane Residents  
The Bedford Estates  
Seven Dials Trust  
Save Bloomsbury  
Soho Society

# 1 SUSTAINABILITY, ENVIRONMENTAL, CLIMATE EMERGENCY

1.1 The Camden Local Plan contains strong policies which respond to the declared emergency prioritising altering or retrofitting and allowing demolition only where it is **not possible** to retain and improve a building.

Relevant policies include:

## **Climate Change Mitigation Policies CC1 and CC2:**

Paragraph 8.17 states:

*'All proposals for substantial demolition and reconstruction should be fully justified in terms of optimisation of resources and energy use, in comparison with the existing building.'*

1.2 **Camden Planning Guidance – Energy Efficiency and Adaptation** states the following:

Paragraph 9.3 lists the benefits of retaining and refurbishing buildings

Paragraph 9.5 outlines the need to follow a hierarchy

Paragraph 9.6 sets out the hierarchy:

- i. Refit
- ii. Refurbish
- iii. Substantial refurbishment and extension
- iiii. Reclaim and recycle

1.3 Around 40% of the world's greenhouse gases result from the construction and running of buildings. Up to two thirds of a building's carbon footprint relates to its construction (its embodied carbon) meaning that around 27% of greenhouse gases relate to buildings' embodied carbon.

1.4 To achieve a sustainable development, it is critically important that Camden follows its policies and prioritises retention of existing structures capable of reuse and does not accept complex and potentially spurious justifications for demolition, which might be advanced to justify maximising the development return, not to advance a truly sustainable scheme.

1.5 The overriding reason for the applicant to pursue a demolition and rebuild proposal, rather than the retrofit solution, seems to be that their expectations of the financial return that they require preclude this approach. We do not accept that the applicant's inflated expectations should be the determining factor regarding the future of this important part of our neighbourhood. The building is structurally sound, capable of adaptation and appeared to be economically viable prior to its purchase by LabTech. For these reasons the proposal should be rejected as it fails to comply with Camden's sustainability policies.

1.6 An audit, commissioned from technical consultants Targeting Zero includes the following main conclusions:

*This planning submission for the demolition and replacement of 1 Museum Street is against UK National Policy, GLA Policy and intentions, and Camden's declared climate and ecological emergency.*

*The potential carbon cost of the new build proposal over a retrofit of the existing building is both significant, avoidable and unnecessary.*

*Camden should require a positive, forward-looking architectural proposal, showing how Selkirk House can be reused, repurposed and retrofitted with an open mind on use types to achieve a viable retrofit option with improved public realm. The central premise should be to retain most of the existing structure and add to or adapt this creatively.*

## 2 HOUSING

### 2.1 Introduction:

This section summarises two aspects of the proposed housing content of the overall development proposals. The first section concerns the quantity and type of housing that is included in the scheme as compared to what should be included in order to comply with Camden's Local Plan and the GLA's London Plan housing policies. The second section concerns the design, setting and amenity of the proposed housing in the context of the overall scheme, concentrating on the affordable and general needs accommodation.

### 2.2 Quantity of housing proposed.

2.2.1 The difficulty encountered from the outset as to calculating what housing should be provided derives from the failure of the applicant to provide robust and verified existing floor areas and location of existing housing throughout the development site, and the abject failure of the Council planning department in not having carried out a thorough analysis and inspection in order to verify LabTech's figures. The Council has been in discussion with the developers over the future development of this site for over 2.5 years and still has not carried out a detailed analysis of its own Council records and not checked what current uses exist, where they are located and what is their quantum. This is deplorable.

2.2.2 LabTech's existing housing figures are based on their claim that no C3 (permanent residential accommodation) exists in Selkirk House. The existing and proposed table of uses attached to the planning application states that there is 495 sq.m. of existing residential use including 97sq.m. of Housing in Multiple Occupation (HMO) all located within the northern block. However, the planning application that was approved by Camden on 26 January 2016 (planning reference 2016/0477/P) for the same properties (not including Selkirk House) stated there is 715sq.m. of existing residential including 135sq.m. HMO accommodation. While an explanation for this discrepancy is that the 2016 report calculates the area in GIA and the latter GEA, using Camden's own planning guidance of 0.95 as the conversion figure, there is still a very substantial difference.

2.2.3 There is a clear disparity of c.184sq.m. as to what total residential floor area exists within the block bounded by West Central Street, New Oxford Street and Museum Street, and also a difference as to the total of HMO accommodation. The fact that there is more established residential C3 use on the northern block verified by Camden in 2016 than LabTech now claim, implies that there is further evidence that LabTech's housing figures have been massaged and manipulated to give the appearance that they comply with Camden Housing Policies when they clearly do not.

2.2.4 The developer's scheme, based on their calculation of 495sq.m. of existing housing on the whole site, contains 29 flats, of which 6 flats are socially rented and 6 affordable, the remaining 17 private/for sale accommodation.

2.2.5 Based on the 495sq.m. of existing residential use on the overall site, the total proposed residential area is not Policy Compliant and the quantity of socially rented and affordable is also significantly less than should be provided. We calculate there should be 37 dwellings provided, of which 9 dwellings should be socially rented and 6 affordable with the remaining 22 private.

2.2.6 The 2016 officer's report states the existing housing floor area within the northern section of the overall site (i.e. excluding Selkirk House) is greater than LabTech now claim, and as a result, once again, LabTech have concocted the housing figures to reduce the amount of housing they should provide to be policy compliant.

2.2.7 It is now acknowledged by Camden that Selkirk House contains 11 maisonette flats occupying 1,331sq.m. floor area so the minimum quantum of housing that should be included in the overall scheme to be Policy Compliant should be 49/50 homes of which 11 should be socially rented and 7 affordable, the remaining 31/32 homes private. However, allowing for the fact that LabTech have under-calculated the quantity of existing housing within the northern block, these figures should be revised to 51/52 homes overall, of which 12 should be social rented and 8 affordable, with the remaining 31/32 private. This compares to their current scheme of 29 dwellings, 6 socially rented, 6 affordable and 17 private.

## **2.3 Housing Quality**

2.3.1 The affordable and social accommodation is located facing West Central Street. The primary habitable rooms look across to the 22-storey office block which is only 7.5m distant. The proposed office tower has a much longer elevation along West Central Street than the existing Selkirk House. The overall effect will be to cast a shadow over all the housing for most of the year and stop any sun penetration into the general needs/affordable housing. The rear elevation of these dwellings has no aspect being 4m and 8m distant from the rear elevations of the adjacent buildings; so, the overall effect will result in dark and claustrophobic accommodation.

2.3.2 As the affordable flats are located primarily at 1st and 2nd floor levels these will suffer the most. The daylight and sunlight quality will be highly compromised by the office tower. The extremely close proximity of the office accommodation, directly across West Central Street, and buildings to the rear, will cause severe visual intrusion. To propose to construct new housing that will have such negative attributes is deplorable and a direct consequence of the bulk and height of the proposed office tower and overdevelopment of the northern section of the overall site.

2.3.3 It is not surprising that the private housing proposed is located fronting New Oxford Street and High Holborn where their primary habitable rooms will not be overlooked. They will not be subject to perpetual shadow with minimal sunlight penetration.

2.3.4 The applicants make great play that the new accommodation will be dual aspect, a quality that certainly is desirable. The reality is that the primary elevation of the affordable accommodation will be visually overwhelmed by the northern elevation of the office tower block. This accommodation will be overlooked, will almost permanently require artificial light and will have no sky aspect. This new housing will fail to meet the minimum amenity characteristics set out both in Camden Housing Design Supplement and the standards set by the GLA.

2.3.5 The quantity and quality of open space dedicated to the residential accommodation is very sub-standard and fails to meet both Camden's amenity design requirements and quantity of dedicated communal play space for residential accommodation. Some flats have balconies but the majority of the housing is reliant on the internal courtyard located at first floor level, totally surrounded by the buildings around the perimeter of the northern site. This space will always be in the shadow of the office block tower.

2.3.6 The first-floor internal courtyard's primary function is to provide the only access to the housing located on West Central Street and Museum Street. There is no room for any play facilities like swings or ball games and certainly no possibility of any soft grass landscaping. The lack of sun penetration will not make the courtyard an attractive open space and will not provide conditions to support grass and limited plant life. It also substantially falls short of the required area stipulated in Camden's planning standards.

2.3.7 The inner courtyard's minimal amenity value will be further compromised by service ducts and mechanical ventilation shafts that are to serve the restaurants and other retail and commercial uses located directly below. These ducts are suggested on the submitted drawings but no details are given. The proposed retail and restaurant uses are located directly under the housing and run the full depth of the West Central Street/New Oxford Street 'island' block. Inevitably there will be conflict between the restaurant/bar uses below the courtyard and the residential accommodation above. The housing will be subject to both noise and possible smells from the extracts and air intakes serving the street level commercial uses.

## **2.4 Conclusions**

### **2.4.1**

- i. The overall development fails to meet Camden and the GLA's minimum housing requirements. It is not policy compliant.
- ii. The quality of the affordable and general needs housing will be poor as a consequence of the height, mass and siting of the proposed office tower and the over-development of the northern plot. The housing will suffer severe overlooking and will have a very poor level of amenity and open space provision
- iii. The minimum open space requirements for new housing set out in Camden's Local Plan are not met; indeed, the communal open space is likely to be a noisy and unpleasant space and will adversely affect the quality of the housing.

### 3 VISUAL AND HERITAGE IMPACT

3.1.1 The existing Selkirk House is 14 floors above a three-storey podium. Its replacement is 21 floors, plus roof plant. Its roof parapet height is +78.46 AOD and the roof parapet height of the proposed development is +105.25 AOD. The ground level varies across the site, but is circa +25.00 AOD. The existing building is 53.46m above ground and the proposed building will be 80.25m above ground. So, the proposal will be 50% taller than the existing building.

3.1.2 For comparison, Centre Point is 34 floors and 117m high. So, the proposal will be 70% the height of Centre Point.

3.1.3 The proposed tower will be taller and therefore more visible and, with a long elevation of some 41m, will present a bulkier skyline profile and a slab-like appearance akin to the existing building but larger. The model image on page 2 of the Zone of Visual Influence report reveals more of the proposed bulk and massing of the development. It is hardly what might be described as an elegant tall building, responding to the sensitivities of context. It seems to be more the product of an optimum 5,000sq.ft. floorplate placed on the site, extruded through maximum height and crudely moulded by rights of light constraints. In other words, a financial model, not an architectural model.

3.1.4 We do not consider the proposed tower would in any way enhance the street scene in the Bloomsbury, Covent Garden, Seven Dials and Soho Conservation Areas to meet the requirements of Policy D2. With such a bulky and inelegant form, it would be helpful to see some direct comparison between the massing of both existing and proposed building forms in order to understand why the development team considers it does. We are unconvinced by the conclusions in the TVIH Report that "it would relate well to the local townscape character", would "relate successfully to the varied heights of other buildings in the local area" and "enhance short, medium and longer-range views". It would not.

3.1.5 Nor was the November 2019 Design Review Panel convinced, which concluded: "the Panel finds the height of the proposed tower problematic. Compared with the existing building the proposals show a significant increase in height which will make the scheme very visible in this sensitive context, especially in long views from Bedford Square and the British Museum steps". Then "Buildings in the local context have more squat proportions. The Panel suggests it could be beneficial for the scheme to reference these proportions, making the tower shorter and wider, this massing may be more appropriate to the identity and character of the area". This opinion did not carry over into the 2020 review, with three new panel members out of five, although the building remained the same height, as confirmed in the evolution of the design outlined in Section 3.3 of the D&AS. There was some discussion on the impact on heritage assets but the consequences of precedent were not considered nor was there any mention of the impact on the setting of Centre Point, now also a listed building.

3.1.6 At a pre-application consultation on 11 November 2019, the Community Group responded: "That there is an existing, poor quality, tall building on the site is no justification for another, which we would not support. The existing skyline profile suggests a medium-rise, high site-cover group of buildings would be appropriate, not the creation of a 'western cluster' of tall buildings around Centre Point." Discussion of this was discouraged by the development team at subsequent consultations and our views still stand.

#### 3.2 Wider impact

3.2.1 The Zone of Visual Influence clearly demonstrates the extent to which the proposal will be visible across a large part of Central London. It confirms what we have been saying all along, while Camden have been led to believe the building would be invisible. Indeed, it suggests the proposal could be more visible than we hitherto expected.

3.2.2 That said, a degree of caution needs to be taken in considering the assessment, when the modelling it is based on is not accurate. The note on page 2 states: "This study is generated using a simple computer model that combines an accurate model of the proposed scheme with a highly simplified model of the surrounding context (with buildings shown to an accuracy of approx. +/- 1.5m)." It would be helpful to see how simplified that contextual model is, because it could have a significant effect on some of the longer distance views.

3.2.3 Equally, we need to be mindful that the map on page 3 seems to plot the shadows cast by a 'light' source on the top of the building when the model on page 2 suggests other light sources might have been

placed at different heights up the building. Analysis of the comparative shadows cast by light sources at different heights would reveal the amount of development that would be visible and hence some initial judgement could be made on its impact. We suggest further information on this should be requested from the development team.

3.2.4 The development team, in an e-mail to us dated 9 July 2021, maintain that the proposal is invisible, arguing that the building "has been carefully situated so as to be fully screened in all local views tested... and its impact, or lack thereof, on the total set of views can be seen within. Consultation sessions with Miller Hare encouraging community-led selection of new 3d views also included this equipment." This is misleading, particularly as there were no 'consultation sessions with Miller Hare'. It is equally misleading when the TVIH concludes that the proposal is visible and, "The height of the tower would provide a piece of townscape 'punctuation' along High Holborn..." The backdrop to the Grade II listed Shaftesbury Theatre viewed from Princes Circus can hardly be described as mere 'punctuation'.

3.2.5 In an e-mail to the planning case officer, dated 22 February 2021, the Bloomsbury Association anticipated that a tall building on the site could, amongst others, be visible from the following locations in Camden:

- Bedford Square
- Bloomsbury Square
- Russell Square
- Lincoln's Inn Fields
- British Museum forecourt
- Drury Lane
- Princes Circus
- Primrose Hill

It was also anticipated it would be visible from the following locations in Westminster:

- Soho Square
- Cambridge Circus
- Shaftesbury Avenue
- Oxford Street
- Grosvenor Square, looking along Brook Street
- Whitehall, approaching Trafalgar Square
- Great Marlborough Street
- Piccadilly approaching Piccadilly Circus
- St James' Park
- Horse Guards' Parade
- Regent's Park

3.2.6 Crucially, it would be visible from and do extensive harm to the Bloomsbury, Covent Garden, Seven Dials and Soho Conservation Areas that surround the application site, in addition to having substantial cumulative impact on several heritage assets: the many listed buildings located in neighbouring streets. It would also do harm to strategic views safeguarded by London Plan Policy 7.11 - The London View Management Framework. These include protected river prospect views from Blackfriars Bridge, Lambeth Bridge, South Bank, Albert Embankment and especially the protected silhouette of the Palace of Westminster.

3.2.7 It would also dominate Museum Street, Bloomsbury 'village' and the setting of St George's Bloomsbury.

3.2.8 The height and bulk of the proposed development would be such that it would have an intrusive, harmful effect on the setting both of Bloomsbury's squares and of the listed buildings within and around them. Views from the squares, especially after leaf fall, will suffer from the adverse effect of the unattractive addition to the skyline.

3.2.9 The Bloomsbury squares are important and world-renowned architectural set pieces safeguarded by the Bloomsbury Conservation Area within which they are located. There are many listed buildings in and around these squares. They are important both to the many nearby residents who live in an area of open

space deficiency and also to internationally important institutions. Bedford Square is a particular example affected by the proposal.

### **3.3 Bedford Square**

3.3.1 Bedford Square was built between 1776 and 1780 for the Duke of Bedford. It is considered one of London's finest and best-preserved historic squares and is the only intact Georgian square in London. It was the first garden square with an imposed architectural uniformity that set the style for garden squares in London through the late 18th and early 19th centuries.

3.3.2 To reflect its importance, all of Bedford Square's 54 buildings are Grade I listed and Historic England defines Grade I buildings as being 'of exceptional interest, sometimes considered to be internationally important'. The gardens have a Grade II\* listing on the English Heritage Register; all its later gas lamps are Grade II listed as is the garden pavilion. The meticulous design of Bedford Square reflects the classical tastes of 18th century England for coherence and consistency in urban planning and city-scale architecture.

3.3.3 The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. The Plan's policies seek to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. This recognises that asset value is more than the fabric of the square's buildings but in the spatial quality of the space that they define and the approaches to, from and within it.

3.3.4 For this reason, in 2000, with substantial funding from Bedford Estate, English Heritage, Crown Estate and the London Borough of Camden, its public realm underwent careful refurbishment to reflect the high asset value of its heritage.

3.3.5 Selkirk House already detracts from the setting of Bedford Square and reflects attitudes prevalent at the time it was built. The proposed development, by virtue of its bulk and height, will make things worse. It will be dominant in views from the north and eastern sides of the Square and will detract from its setting. These are characteristics that are not compatible with current policies that seek to safeguard heritage assets, nor are they consistent with Policy D2 of Camden's Local Plan or the design principles contained in the Fitzrovia Area Action Plan.

### **3.4 Townscape, visual impact and heritage**

3.4.1 The analysis of visual impact in the Townscape, Visual Impact and Heritage Report, submitted in support of the application, is deficient and ignores several of the viewpoints identified above and also views from within listed buildings and heritage assets in the conservation areas. These are important components of the settings both of listed buildings and conservation areas. Notable examples are Sir Robert Smirke's British Museum with its forecourt off Great Russell Street and Nicholas Hawksmoor's church of St George's Bloomsbury, both listed Grade I. It is also deficient in that it only considers local viewpoints within Camden and a selection of those that are part of the London View Management Framework. The analysis does not consider views from Primrose Hill (LVMF 4A), Blackfriars Bridge (LVMF 14A), Albert Embankment (LVMF 22A) and gives scant consideration to encroachment onto the protected silhouette of the Palace of Westminster in view 21.1. It also ignores all other viewpoints from within Westminster and the Council should seek the opinion of its neighbouring authority before determining the application.

3.4.2 We are sceptical of some of the viewpoints that are considered in the assessment. For example, by selecting a viewpoint at the centre of the portico to the British Museum, part of the proposed development is obscured in a way that it would not be a few metres further west. Reference should be made to the assessment of the same viewpoint submitted in support of the application for The Post Building, 21-31 New Oxford Street (2014/5946/P) that considers four, not one viewpoint from the Museum forecourt, respecting its size, its shape and the way people move around and use the space. Indeed, the Townscape and Visual Impact Assessment prepared for the Post Building is indicative of the extent of the assessment required, something that is lacking from this submission.

3.4.3 Similarly, there is only one view to assess the impact from Bloomsbury Square and no views from within Russell Square or Lincoln's Inn Fields. There are also instances where the viewpoint appears curated to minimise visibility, notably the choice of the western pavement of Drury Lane in view 18, rather than the opposite side of the street, where impact could be far greater. This needs to be requested from the applicant.

3.4.4 There is also the view from the public garden on the roof of the Post Building to consider. From there, the whole of Central London is set-out below, and apart from Centre Point, Senate House and Space House, nothing interrupts the near or distant views or the open sky. The top of Selkirk House is just visible from the roof garden. The proposed office tower would be 30m higher and would both obstruct that view and overshadow the garden.

### 3.5 Listed buildings

3.5.1 At present the famous Grade II listed James Smith & Sons umbrella shop at the junction of Bloomsbury Street and New Oxford Street masks the Travelodge tower. The route from Tottenham Court Station going east along New Oxford Street is an important thoroughfare. No thought has been given to how intrusive the proposed tower will be above this charming shop and its neighbouring buildings.



James Smith & Sons

3.5.2 There are no listed buildings on the proposed development site. Grade II listed buildings adjoin the site boundary at 43- 45 New Oxford Street and 16 West Central Street. In addition, 33-41 New Oxford Street, 10-12 Museum Street and 16A-18 West Central Street are each identified as 'positive contributors' in the Conservation Area Appraisal. The shopfronts at numbers 10 and 11 Museum Street are identified separately as positive contributors to the Conservation Area.

3.5.3 There are a number of listed buildings nearby that are described in the Built Heritage Report presented as Part 2 of the TVIHR. These are of particular concern:

- 43-45 New Oxford Street
- 16 West Central Street
- Bloomsbury Central Baptist Church
- 233 Shaftesbury Avenue adjacent
- 83 Endell Street
- Shaftesbury Theatre
- Centre Point
- Holborn Town Hall and Library

3.5.4 They are all close enough to be visually affected and suffer considerable harm by the proposed development as is clearly evident in views 6A, 6B and 10 concerning the settings of 43-45 New Oxford Street. View 8 convincingly demonstrates the same harmful effect on the setting of Princes Circus, Bloomsbury Central Baptist Church, Queen Alexandra Mansions and King Edward Mansions. View 9, examining the setting of St George's Church, Bloomsbury, would be more informative if seen from a viewpoint further west and view 10 ignores the important prospect from the church portico. View 12, examining the effect of a taller building as the backdrop to the Shaftesbury Theatre is accompanied by a commentary that tells an unconvincing narrative about breaking down its massive scale, the effect of which



is not evident. There is no visual evidence to consider the effect on Centre Point, an icon of Central London's skyline, standing in splendid isolation at St Giles Circus.

3.5.5 In considering the effect of the development proposal on the significance of heritage assets the TVIH concludes: "Where visible in views of those heritage assets, the Proposed Development would be seen to a generally limited extent, clearly distinct from the heritage asset in question, and with a stepped form and ordered elevations which would relate well to nearby heritage assets. The Proposed Development would preserve the settings of these heritage assets, would leave their heritage significance unchanged, and would not affect the ability to appreciate their heritage significance." Again, there is a misleading attempt to convince the reader that the development is invisible and has no effect on any assets' setting, despite being so close and so much taller. Images of views 6, 8, 10 and 12, evidence that this is incorrect and the visual harm is significant.

### **3.6 Precedence**

3.6.1 While the visual impact of the proposed building would be unacceptably harmful in itself, it would set a precedent for something many others have previously attempted to do and failed: to develop a midtown cluster of tall buildings to rival the City in the east and Paddington in the west. Indeed, Section 3.2 of the D&AS suggests it is intended to set a precedent by setting a new skyline datum for the immediate area. The cumulative impact of other developments, pressure for which this would encourage, and which would be of comparable impact, is a further reason for refusal. As a general proposition, permission for development may set a precedent for further development of the same character and is therefore a material planning consideration: *Collis Radio Limited v Secretary of State for the Environment* (1975) 29 P & CR 390.

### **3.7 Conclusion**

3.7.1 We conclude that the overdevelopment and height of the tower block is totally unacceptable and destructive and shows callous disregard of the quality of the adjacent conservation areas and listed buildings.

3.7.2 The proposed development by reason of its design, height, size and prominence, would be detrimental to the appearance of adjoining listed buildings and the character and appearance of the adjacent conservation areas. It would also be damaging to the setting and the assembly of the Grade I listed buildings in Bedford Square; the setting of the Grade I listed British Museum on Great Russell Street and, in particular, the setting of Grade I listed St George's Church, Bloomsbury. This is contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework 2019.

3.7.3 We maintain the view expressed at the pre-application consultation in November 2019, that the existing skyline profile suggests a medium-rise, high site-cover group of buildings would be appropriate, not the creation of a cluster of tall buildings around Centre Point.

3.7.4 The Group has always taken a firm position in ensuring that the asset value of the area's heritage is not adversely affected by new development and expects the Council to ensure that the requirements of Policy D2 are met and that it will not permit any further development that it considers would cause harm to the setting of listed buildings or that causes harm to the character and appearance of the conservation areas.

## **4 DESIGN QUALITY**

4.1 The context for this scheme, surrounded by conservation areas is mixed; adjacent on Museum Street is the recently retrofitted Post Building, a substantial structure dating from the 1960s. To the north of the site along New Oxford Street are mainly 19thC buildings of modest scale, mostly 4, 5, or 6 storeys, often individual buildings giving visual variety in the street frontage.

4.2 The site itself also has a mix of buildings, including the modestly scaled New Oxford Street buildings. Selkirk House, a modern movement 1960s building, consisting of a podium and office tower, is the dominant building, sitting at the corner of Museum Street and High Holborn, it was built as the headquarters office for TrustHouse Forte, a leading hotel and leisure company of the period. The photograph published in the architectural press at the time shows an elegant building proudly displaying the THF logo.

4.3 The proposal involves the demolition of buildings within the conservation area, all of which are recorded as significant and warrant protection. The facades of existing buildings are to be retained along Museum Street, an approach which is unsatisfactory and likely to lead to an incongruous development where the interiors, often clearly visible at night when the interiors are illuminated, bear no relationship to the exterior.

4.4 The treatment of the small-scale West Central Street is a missed opportunity to respect and enhance the conservation area. Instead of demolishing the remaining buildings, the grain and character of this street could be enhanced by restoration and the addition of an appropriately scaled new frontage to replace the area presently occupied by the car park access ramp. The proposed new buildings on West Central Street are bland and include gaps to accommodate escape staircases, demonstrating a lack of a humane design approach.

4.5 The design and access statement draws from the local context referring to the influence of the architect Charles Doll, who designed the adjacent King Edward and Queen Alexandra Mansions, as well as the Kingsley Hotel adjacent to St George's Church on Bloomsbury Way and the Russell Hotel in Russell Square.

4.6 Doll's style creates rich street facades using fine terracotta and red brick, classical details such as fluted columns, organic decoration, bays and oriels and horizontal datums.

4.7 The contrast between the 19<sup>th</sup>C buildings of Doll and the new scheme is stark – while his use of horizontal datums has been used as a design key by DHDS, this has not been done to enrich the architectural treatment of the facades of No. 1 Museum Street, but to introduce cut backs in the bulk of the new building. Instead of the low podium of the TrustHouse Forte HQ, the new building fills its footprint to a height of five stories, already a step up from the Cuban Embassy, with a modest cut back to the ninth storey, slightly above the adjacent level of the Post Building. The final cut back is at the 12<sup>th</sup> storey, above which rises the full height of the new tower. The overall impact is of a much bulkier and taller building than its surroundings, which will have a dominating impact on its surroundings, towering over the substantial Post Building, dwarfing the nearby 19<sup>th</sup>C buildings and having a significant and detrimental impact on important nearby listed Grade 1 St George's Church one of Nicholas Hawksmoor's fine London churches, the Grade 1 British Museum, a building of international importance and the nearby Shaftesbury Theatre. The applicant claims that the existing Selkirk House is prominent when viewed from the steps of the British Museum but this is an exaggeration – the view as existing shows a modest part of the north elevation of Selkirk House but the new tower will be a dominating presence, rising above the site's North Oxford Street frontage.

4.8 In detail, the facades of the new building are regular and bland in contrast to the rich variety of the buildings of Charles Doll, the cut backs are used in the manner of the commercial buildings of New York, built in the period of the 1950s-60s to maximise the volume of the building within the context of planning and daylight legislation. The impact of the bulky and tall new building will be similar to the New York experience, creating canyons with little sunlight.

4.9 The stepped design lacks the architectural simplicity of the building it replaces but does not achieve the visual interest and quality of detail of the nearby 19<sup>th</sup>C buildings.

4.10 A 'benefit' of the scheme, a pedestrian landscaped passageway, Vine Lane, is illustrated by an artist's impression showing a space flooded with sunlight. This image is totally misleading. The very narrow space and its North/South orientation will mean that the sun will rarely penetrate the passageway, when briefly aligned with the route's axis, the sun will for most of the year be too low in the sky not to be obstructed by adjacent buildings.

4.11 The route proposed does not form a logical corridor between existing pedestrian routes and will be a dark and potentially dangerous alley, offering a new home to the drug dealers who frequent West Central Street. It will be of no public benefit.

4.12 In summary, the new development proposes a building of excessive bulk and height, which will dominate its surrounds and adversely affect views from important public spaces and key heritage buildings.

4.13 This over development is an example of unintelligent densities and demonstrates the difficulties of such density when impacts become unmanageable. Unintelligent densities and market forces do not shape place, they destroy it.

4.14 The D & A Statement 1 has a longitudinal section along High Holborn (page 36 section AA), this shows the site and nearby buildings as far as Centre Point to the west and shows the Central St. Giles development a key recent scheme on an important site at the north end of Shaftesbury Avenue. Architecturally forceful with the individual blocks clad in vibrant colours, the scheme maintains the general height and scale of its surroundings by breaking the bulk into individual elements and avoiding the ego trip of a tall tower. This is a modern, successful commercial scheme demonstrating that overdevelopment and excessive height and bulk are avoidable.

## **5 COMMUNITY ENGAGEMENT**

5.1 This is a highly controversial proposal, relating to a site which straddles the Bloomsbury Conservation Area and which will have a significant impact on that area as well as on important historic buildings and spaces in the vicinity. Consequently, a comprehensive and transparent consultation process is vital.

### **5.2 Initial community engagement for the site**

In 2016/17 the previous developer for the site invited BCAAC (Bloomsbury Conservation Area Advisory Committee) to a consultation meeting about their initial plans for redevelopment. They had engaged TP Bennett Architects to come up with a design for the West Central/ Museum St/ NewOxfordStreet which looked promising as it was much more in keeping with the original Regency period.

5.2.1 Then Labtech took over and our Tenants and Residents Association met with them in 2017 via the London Communications Agency. We wanted to express our views early in the process about the need to respect the scale and architecture of the historic area. The TP Bennett plans were mentioned as an appropriate example. Labtech were now engaging Orms (who were responsible for the successful No.1 New Oxford St project and the highly successful retrofit of the 1960s Camden office building, now the Standard Hotel). Orms chief architect showed some new plans for the site but at no point was there any suggestion of a new tower.

5.2.2 We also expressed our wish, as before with the Post Building, for the community to have some space in any new development for local uses e.g. a new GP surgery and workshops for local artists, ideally with rents to be subsidised in a Section 106 agreement.

5.2.3 Labtech's spokesperson at the meeting was Mark Alper, who had been heavily involved in their Camden Markets venture. He was interested in meeting again to discuss community engagement but in spite of promises to do so, there was no further contact from them.

### **5.3 Comments on the developer's statement of community involvement (SCI)**

5.3.1 Reading the SCI, one almost gets the impression that Labtech does not understand the true meaning of the word consultation, which involves both providing (complete and accurate) information and listening to the views of consultees. Entirely consistent with the candid comments of Mr. Watson on 15 April, discussed below, the so-called consultation process has been an exercise in Labtech simply telling residents and community and amenity groups what it is going to do on a unilateral basis. Labtech has also sought to claim, without any adequate explanation, that Camden's unspecified requirements leave it with no option but to knock down the existing structures and erect an 80 metre Tower on the edge of the Bloomsbury Conservation area.

5.3.2 Most residents and community groups do not recognize this narrative set out in the SCI of a full consultation process about a proposal to erect an 80m office tower. Labtech carried out an erratic process beginning in 2017 with minimal resident involvement on two separate occasions in Dec 2017 and January 2018 but then failed to keep in contact with them or to provide any explanation for the delay, for a further 18 months, until a new design proposal emerged. Since then, by its own admission, Labtech has chosen to ignore the views of local residents and community associations.

5.3.3 The SCI document purporting to summarize the consultation process is fundamentally misleading because of the significant matters it omits. It is also very selective in a number of key respects.

The principal omission relates to the Zoom meeting on 15 April organized by local community groups. The purpose of this meeting, faced with a complete lack of community engagement by Labtech, was to propose a genuine and constructive dialogue between Labtech and the various community groups and individuals who had organised to express their concerns about this development. At that meeting, Jonathan Watson, a senior member of the Labtech team, made the categorical statement that Labtech had no intention to discuss their brief nor for that matter anything above the ground floor level with the local community, asserting (incorrectly as it subsequently turned out) that this had been agreed with Camden. Any consultation would be limited to the landscaping proposals.

5.3.4 It is important to bear in mind that the application constitutes in reality several proposals combined in one massive project. Understandable focus on the proposed 80 Metre tower block means that there has been very little disclosure or transparency about the detailed proposals for the New Oxford Street/ Museum Street block or the proposed new constructions on West Central Street.

5.3.5 More generally, there has been a pattern of evasiveness on the part of Labtech and its team. For example, they have been reluctant to disclose the exact height of the proposed tower block. Labtech have been selective in a number of key respects:

- they appear to have been selective about who they decide to consult with, referring in the SCI to unidentified *stakeholders*. Local residents and businesses have been ignored.
- They have been selective, bordering on evasive, about the information they choose to make public. Some of that information, notably about existing residential accommodation, appears to have been inaccurate.
- They have been selective in producing the summary in the SCI of their “consultation” process.

5.3.6 During the period which, according to Labtech began in 2017, there have been two set piece presentation sessions, both by Zoom, for local residents. Neither was organised by Labtech. The first, in December 2020 was organised and hosted by Camden. The second, referred to above, in April 2021, was organised by local community groups.

5.3.7 This lack of genuine consultation is particularly remarkable given that Labtech boast a director whose title is *Director of Community Engagement* and who, in addition, manages to combine that role with being a Camden Councillor and Cabinet Member.

5.3.8 It would seem that the Covid crisis has been rather convenient for Labtech in providing a pretext to avoid the sort of transparency which a controversial development of this nature requires. Now that Covid restrictions are being relaxed, there is an opportunity to have a proper consultation following a fully informed presentation of the totality of the proposal, including the impact on the local community and on surrounding streets and monuments. In particular, Labtech have to date been entirely silent on what sort of ordeal it is proposing to inflict on the local community over the (now at least 4-year long) demolition and construction exercises to erect its 80-metre tower block and the other structures proposed.

5.3.9 Suffice it to say, there is not a single community, political or local group that has come out to support this proposed development. A groundbreaking coalition of community members have, in fact, come together to oppose this project, very clearly signalling that the area does not want this to go ahead. We have made perfectly clear that we want something done with this site but we fundamentally disagree with destroying the existing structure, building something taller and providing so little public benefit such as housing. LabTech have openly refused to engage with the local community throughout the process, going so far as to offensively say that the only thing we can have a say about is the street level gardening. If that's community engagement then it's laughable and Camden should intercede to see due processes are followed in a meaningful way or not at all. Community engagement thus far has been a sham, and that's without mentioning that LabTech have a Councillor on their payroll, who hasn't engaged with a single community group once except to threaten us with legal action when we asked him to do his job.

5.3.10 This is a community, people are living here, raising children, working, growing and learning. A demolition and building project of this scale would have an enormous impact on our quality of life, not least in noise, pollution, congestion and the pain felt by those who have tried so hard to push for a better alternative. We've already dealt with several mental health crises at the point of this development being proposed, let alone carried out. What safeguards and benefits are on offer for the people who create, support and make this area great? So far none, and there has already been significant damage to many.

The people get a say and our message is clear; we say, 'No' to this application.

## **6 SUNLIGHT AND OVERSHADOWING**

6.1 The proposal will result in an unacceptable degree of overshadowing of existing surrounding buildings, depriving residents, businesses and visitors of the open sky, views and sunlight that they presently enjoy. The overshadowing of adjacent streets by this huge office tower will cause an unacceptable degree of harm to the neighbourhood's streets and will certainly not enhance the environment of the conservation areas.

6.2 The Council has a responsibility to protect the local community from the erosion of these elements of sun and light, so essential to wellbeing, especially as they are being taken away to enable the construction of an unnecessary and unwanted speculative office development.

6.3 In many parts of London, the fallout from the granting of planning permissions for such overpowering high-rise towers is now being realised, as the damage they cause to adjacent neighbourhoods is acknowledged. We trust that Camden will learn these lessons from the very recent past.

6.4 By blocking beneficial daylight and sunlight from falling onto the façades of existing neighbouring buildings, this alien tower then transfers these precious assets to its own building, to the detriment of the rest of the community. Is this an environmental theft?

6.5 At night-time the light spill from office windows will also be a nuisance to neighbouring homes as will the glare from the inevitable red warning beacons required for aircraft safety.

6.6 The shadow cast by this tower block will also at times extend into Museum Street, putting this street into shade and harming the street environment for local residents and for the thousands of visitors to the British Museum.

6.7 Critical to any assessment of the potential harm that overshadowing will cause is: (a) the height of the building and (b) its distance from neighbours. In this case, not only is the height of the tower excessive and bulky, but its distance from adjacent, and already high buildings, such as the Post Building, is as little as 20 metres. Both of these factors will create 'canyon' streets below, to the detriment of the conservation area and to the lives of those who live, work and visit. This is incompatible with the Council's stated vision for Bloomsbury and its obligation to enhance the Bloomsbury and Covent Garden conservation areas.

6.8 This tower is unwelcome. It is the wrong building, in the wrong place and at the wrong time. Its height is inappropriate, damaging and inconsistent, even when measured against its more recent high neighbours, all buildings constructed or refurbished under the same planning system and permitted by the same council. To impose this massive unwanted and unnecessary tower 27metres higher than the already high Selkirk House is simply wrong.

## **7 OPEN SPACE AND PUBLIC REALM**

7.1.1 There are three elements to the Public Realm / Open Space proposals within the overall development.

1. Public open space
2. Provision of open space and play areas for the proposed housing
3. Street hard landscaping

7.1.2 The relevant planning policies that LabTech's proposals need to comply with are set out in Camden's Local Plan Section A, titled Open Space, and the recently revised Supplementary Planning Document 'Public Open Space' amended and re-issued in January 2021.

7.1.3 Camden Plan Policy A2 States that in order to secure new and enhanced open space and ensure that commercial development does not put unacceptable pressure on the Borough's network of open spaces,

the Council will apply a number of policies especially in areas like Covent Garden/Bloomsbury designated as areas deficient of public open space. The most relevant to the Selkirk House development is item (m) that states the Council will require a minimum of 9 sqm of open space per occupant for new housing accommodation and 0.74 sqm for commercial development over 1,000 sqm and (n) the primary aim is that these provisions are to be achieved on the development site.

## **7.2 Public Open Space.**

7.2.1 The current proposals comprise Vine Lane, with its “pocket moment park” (applicant’s description, consisting of a bench and a tree in front of a fire escape and possible vents from the basement areas located on Vine Lane), and the proposed planting areas suggested for Museum Street on the current hard surfaced area facing The Post House and Selkirk House. These two areas are the sum of the public open space that they designate as Public Open Space.

7.2.3 In LabTech’s open space calculations they have included the public footpaths along West Central Street and Museum Street and the paved area of Vine Lane that is likely to be gated. They state the public open space they are providing is 1,860 sqm. In this figure they have included the taxi drop off point and have also included the area under the office tower arcade that is to be built on the current open area in front of Selkirk House opposite the Post House. The office tower occupies a greater area at ground level than Selkirk House. It will be some 5m closer to Museum Street and some 2/3m closer to West Central Street. The current paved area between The Post House and the proposed tower block will be significantly reduced. Labtech give the current public open space as 1,331sqm again including the public footpaths and taxi drop off point. The difference is 529sqm which is the Vine Lane pavement area.

7.2.4 The pavement area of Vine Lane which is illustrated as being used as extensions of the commercial retail/bar/restaurant and cafe facilities that they hope will occupy either side of this cut-through as they say will be “carved through the site”. Vine Lane is clearly not public open space it is private land occupied by tables and chairs and is very likely to be gated. The other area that LabTech claim is public open space is in fact already in existence. So, in effect no new public open space is being provided. What is being proposed is that the hard surfaced areas will be treated with some additional seating, planting and new surfaces.

7.2.5 All of these are being done to improve the commercial attractiveness of the proposals and none inherently as a consequence of complying with Camden’s policies that require NEW public open space to be incorporated into large scale commercial developments.

7.2.6 What should be provided to comply with Camden’s Open Space policies is set out in Camden’s Open Space Planning Supplement 2021 edition see page 6. The area that is required be provided as NEW public open space should be a minimum of 784sqm

7.2.7 This requirement could be provided by locating the required public open space at roof level, as indeed is commonly incorporated within large office developments in the City and has been achieved within the Post House opposite, but the open space must be public, permanent and open all year round and fully accessible. The proposed roof terraces included in the current scheme are all private and some will cause serious overlooking and intrusion into existing residential accommodation in Grape Street.

7.2.8 What is demonstrably the case is the current scheme does not comply with Camden’s open space policies as no new public open space is provided.

7.2.9 Camden’s plan is also quite clear that private accessible open space such as private or communal gardens, roof terraces or balconies do not constitute a substitute for Public open space.

7.2.10 Labtech are deliberately endeavouring to give the impression that they are providing new public open space when they are not. They are upgrading surface treatment of the pavements and roads nothing more and these improvements are all to do with their commercial aspirations.

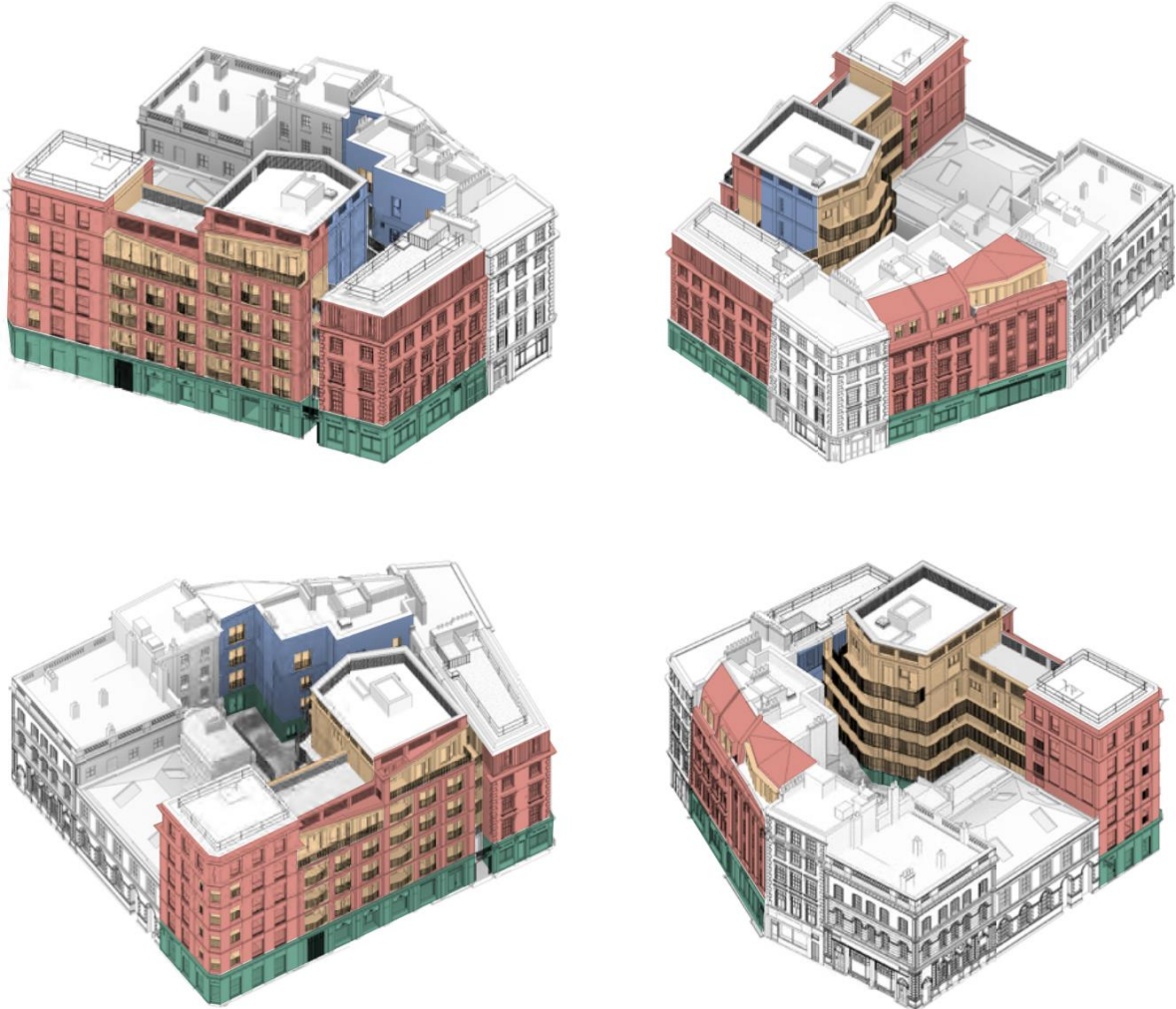
## **7.3 Housing Open Space Provision**

7.3.1 The developers say they are complying with Camden’s planning policies concerning open space for the residential element of the development. They state that they are providing 151 sqm of play space (the developer’s words) within the West Central Street courtyard at first floor level. Details as to how the minimum areas of play space required for new housing is set out in Camden’s Planning Guidance Appendix

E and F. Applying the formula and applying LabTech’s non-compliant housing figure of 29 new dwellings, the minimum area of play space/open space should be 380 sqm, some 250% too little.

7.3.2 The actual play space that Labtech is providing contains no play facilities (unless a few timber posts stuck in a planted bed as is illustrated constitutes a play facility). In addition, the courtyard is primarily a circulation route to give access to the housing accommodation separated by some very small planting beds, and due to the excessive office tower height and the height of the immediate buildings surrounding the courtyard, it will be very dark and oppressive. It certainly will not be an attractive play area for the housing.

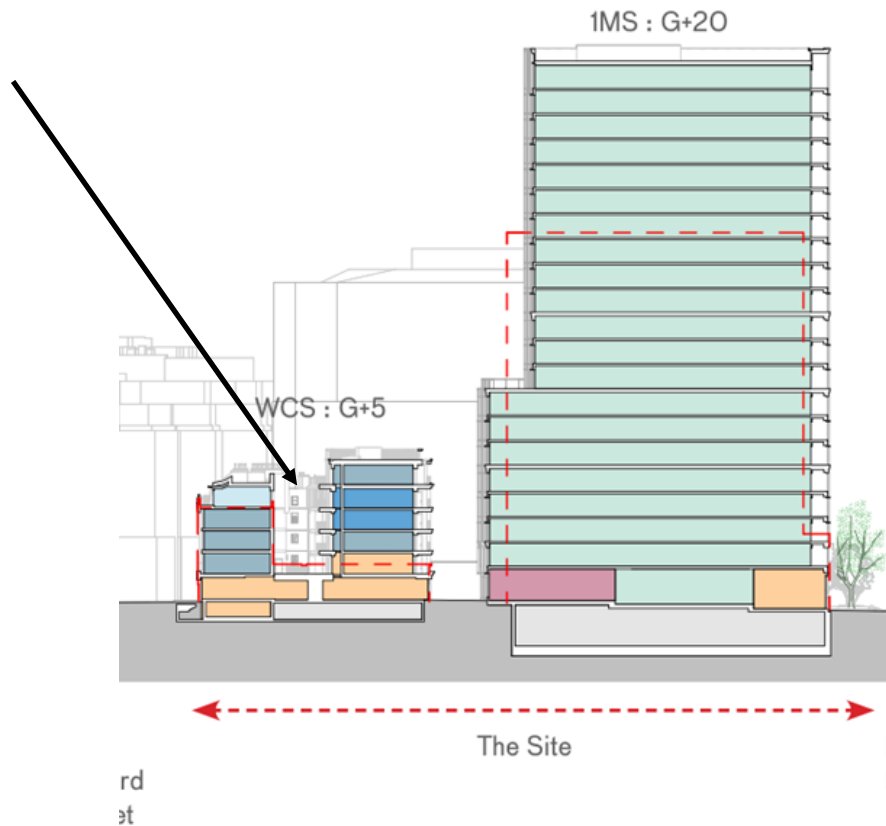
7.3.3 The illustrations below are tucked away in the applicant’s supporting documentation; they illustrate the meanness and unpleasant space the housing courtyard will be and how overlooked as a consequence of the surrounding buildings.



The court yard / play area viewed from various compass points

7.3.4 And the sectional drawings below show how the height and bulk of the proposed office tower will completely overwhelm the housing proposed between West Central Street to New Oxford Street, particularly that facing West Central Street and its shadow will take away daylight and sunlight for most of the year from the so-called open space play area.

Play space for the housing



#### 7.4 Hard surface treatment/ Vine Lane

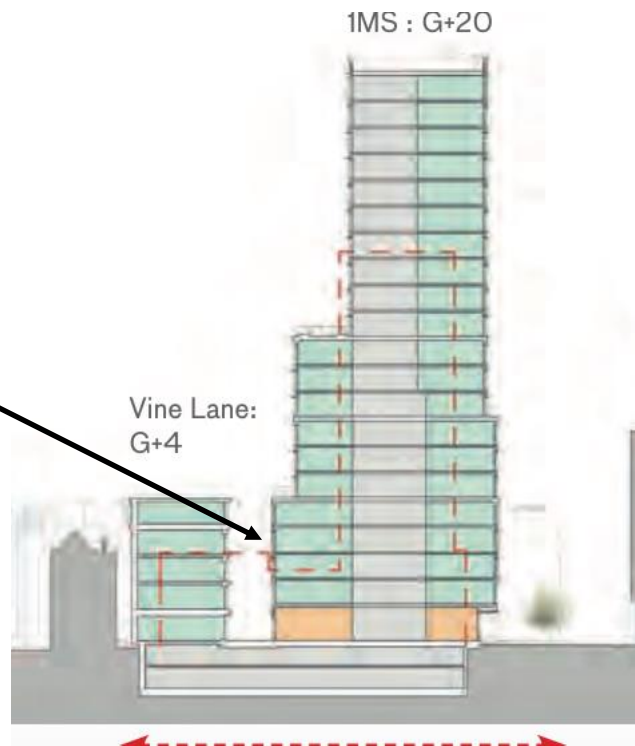
7.4.1 The proposals include the retention of some of the mature trees in Museum St and High Holborn but very regrettably due to the increased size of the proposed building *felling nine, despite being in the protection zone*. Some new trees will be planted and there will be the introduction of some soft planting with some integral seating within the extensive hard pavement area outside the proposed tower block in Museum Street. Some cycle stands are included in West Central Street outside properties not owned by LabTech as well as opposite the housing entry points in a section of West Central Street. The materials proposed are of good quality but this is to be expected as these proposals are only included to make the commercial development attractive, which is commendable but has nothing to do with providing the appropriate quantity of new public open space.

7.4.2 The proposed carving through the site to create Vine Lane is understandably rendered by the applicants as an attractive out door space, whereas as this 'lane' leads nowhere, is narrow and completely overshadowed and physically overwhelmed by the proposed office tower its likely characteristics will be an unattractive and dingy developer's contrivance that has no historical precedent and is only being introduced to produce more retail floor area. The images produced by the same agency that have produced the images of Vine Lane showed the alleyway from High Holborn to New Oxford Street as part of the Post House development as a sunny and attractive passageway. The reality is an unpleasant, rarely used and grotty passageway, and as like the Vine Lane proposal, goes nowhere.

We do not consider this element of the scheme desirable and it is very likely to attract anti-social behaviour.



A sectional drawing showing Vine Lane cut through the site viewed from High Holborn and totally overwhelmed by the proposed office tower rendering it dark and in shadow most of the year round.



## 7.5 Conclusions

7.5.1 The development contains no proposals for providing new Public open space as is required to comply with Camden's planning policies.

7.5.2 LabTech claim they are providing new Public open space. This is demonstrably not true. They are claiming that hard surface improvements to the pavement and road surfaces is the same as providing new open space. It is not and these works would be carried out by LabTech anyhow in order to make their commercial development more attractive; they are deliberately trying to give the impression that these pavement improvements are the same as providing new Public open space.

7.5.3 The required open space and play space for the housing element of the scheme is not being met, by a huge margin, and what is proposed will be dark, lacking in play facilities and a very unattractive space.

7.5.4 The proposed carving through the site to create Vine Lane will not produce a pleasant space. This proposed route goes nowhere, has no historical precedent and is very likely to attract anti-social behaviour. What is needed is to restore the existing urban grain by reinstating the street elevation of West Central Street following its existing and historical route from New Oxford St to Museum St without any cut through to High Holborn.

## 8 BASEMENT IMPACT ASSESSMENT

8.1 The BIA states the site is directly over Royal Mail Group Post Office tunnels; and additional assets owned by LUL, Crossrail, TWUL and UKPN fall within the zone of influence of the proposed works.

8.2 Apart from the risks posed to these assets by the proposed works, mitigation will involve massive and costly piling work to limit both ground heave following demolition of Selkirk House, and then limit settlement when the new 80m tower is built.

8.3 This vanity project, to demolish Selkirk House and erect a new 80m tower instead of simply refurbishing what is already there, will involve 4 years of noise and disruption for local people and businesses, taking twice as long as the sustainable option of using what already exists.

8.4 The deep basement proposed for the Vine Lane building requires a secant piled wall abutting the properties in Grape Street and will involve over two years of construction right adjacent to occupied homes. Local residents are only now recovering from the noise and disruption caused by the Post Building site, and an 18-month complete office refurbishment in Grape Street itself.

8.5 The statement at page 63 of the CMP, “Noisy planet (sic) will be maintained away from the site perimeter as far as is practical”, is laughable on at least two counts.

8.6 It seems true to form that careful attention is paid in the CMP to Bats: no night time working, so as not to disturb the bats! But what about the residents? There is no clear statement about respecting the residents and their right to peace at weekends for example. There is just an opaque reference to compliance with Camden’s requirements – and we have no idea what working hours Camden will decide to allow.

8.7 The BIA identifies that the proposed Vine Lane basement pile wall and underpins will create a cut-off to any existing ground water flow paths. There is more site investigation work to be done to identify whether non-static groundwater exists. Groundwater control/dewatering may be required during construction, which will add yet more noise nuisance.

8.8 It is noteworthy that 9 trees are to be felled in tree protection zones, which will also affect the moisture take-up pattern of the area.

8.9 The BIA provides many assurances that there is low risk of damage to existing assets, but the cost in terms of noise, dirt, disruption, and lack of sustainability, is unacceptably high.

## 9 TRANSPORT

### 9.1 Summary of objections

9.1.1 Arup have produced a Transport Assessment which sets out in some detail the expected routes by which people will access the premises as well as the way in which servicing will be managed. The site is very accessible for pedestrians and cyclists and so our comments are focussed on the servicing aspects of deliveries and waste collection.

9.1.2 We have significant concerns with the assumptions made in in the Transport Assessment and the way in which the applicant proposes to manage servicing and waste collection. These are set out in detail in our Transport Comments section and are summarised below.

9.1.3. Our key request is that **all** of the commercial units in the development area required to manage their deliveries **and** waste through the basement loading bay accessed from High Holborn and that this facility is redesigned so that it is sized appropriately for this purpose. We believe that this is required to comply fully with Camden’s Policy requirements and is also appropriate for a significant development in this area.

9.1.4 We would also comment that we continue to believe that this scheme was an ideal opportunity to provide a micro-distribution facility. This would have significant benefits in terms of reducing the total number of van deliveries, especially for parcels, in the West End as a whole. A number of operators are seeking space for this purpose and this site would be an ideal location for this type of operation. This is something which we made clear to the applicant during pre-app discussions. The failure to explore this is something which the developer and Council are likely to regret in the future.

#### 9.1.5 Servicing Demand

There are discrepancies between the stated assumptions on uses and trip rates used to calculate the number of servicing trips for the development. We believe that the figure should be 28% higher than that assumed in the TA. This then has consequences for whether the available capacity can manage the demand.

### 9.1.6 Servicing Capacity

There is insufficient detail provided on the operation of the basement loading bays to allow us to be confident that the development can receive all of the required deliveries in the way indicated in the TA/DSP. More information is required, especially given the concern about the actual volume of deliveries.

9.1.7 There is no attempt to assess whether the on-street loading bays proposed to be used for part of the development have sufficient spare capacity even though this is required by CPG – Transport.

9.1.8 Waste: The proposal that commercial waste from part of the development will be put on the street in bags does not comply with Camden’s Planning Policy and is not appropriate for the area. We believe that all commercial waste should be managed through the basement waste store and it should be sized appropriately to achieve this.

### 9.1.7 Delivery Reduction

The DSP suggests a number of actions which can be taken to reduce the number of servicing trips required. However, these are suggestions which will be “encouraged”. We believe that the developer should be required to ensure that these are actually implemented as part of any Planning Agreement.

## 9.2 TRANSPORT - DETAILED COMMENTS

### 9.2.1 Number of Deliveries Required

As usual the deliveries assessment sets out the expected demand for servicing and how servicing will be managed. Our first comment is on the way in which the number of deliveries has been calculated.

9.2.2 Arup have used an estimate of the number of deliveries per m<sup>2</sup> GIA for different use types and used this to calculate the required number of deliveries. This is shown in Table 11 of the TA. The number produced is an estimate, the actual number will depend on the actual nature of the specific use. In the past this calculation would have been done using A1 (retail), A3 (restaurant/café) and B1 floor areas, as these uses have different levels of requirement for deliveries. Arup have done the same in this case. However, all of these uses are now in Class E use. The intention of this Use Class is that there is flexibility to switch between the various use types within this Class. However, depending on what the actual use will be will have a significant impact on the number of deliveries.

9.2.3 In the Application the Office use is described as **Class E(g)(i)** but the other uses are described as Flexible **Use Class E**. This would allow the other units to be used for any purpose within Class E.

9.2.4 We have reviewed Table 11 of the TA in some detail and we have a number of comments on the way in which the assumptions have been made and the calculations carried out. These are also shown in our table T below.

### 9.2.5 Table T

Building	ARUP Table 11				Recalculation Trips	Trip Rate Assumption		Use Assumption		
	Use	GIA	Trip Rate	Arup Table		Trip Rate	Trips	Use	Trip Rate	Trips
Museum Street	B1	21566	0.2	39	44	0.2	44	Class E Office	0.2	44
	A1	361	0.52	2	2	0.52	2	Class E Food	2.2	8
	A3	361	1.8	7	7	2.2	8	Class E Food	2.2	8
Vine Lane	B1	1793	0.2	4	4	0.2	4	Class E Office	0.2	4
	A1	61	0.52	1	1	0.52	1	Class E Food	2.2	2
	A3	61	1.8	2	2	1.8	2	Class E Food	2.2	2
<b>Sub Total</b>				<b>55</b>	<b>60</b>		<b>61</b>			<b>68</b>
High Holborn	A1	12	0.52	1	1	0.52	1	Class E Food	2.2	1
	A3	12	1.8	1	1	2.2	1	Class E Food	2.2	1
	C3	426	0.07	1	1	0.07	1	C3	0.07	1
West Central Street	A1	296	0.52	2	2	0.52	2	Class E Food	2.2	7
	A3	296	1.8	6	6	2.2	7	Class E Food	2.2	7
	C3	2480	0.07	2	2	0.07	2	C3	0.07	2
<b>Sub Total</b>				<b>13</b>	<b>13</b>		<b>14</b>			<b>19</b>
<b>Total</b>				<b>68</b>	<b>73</b>		<b>75</b>			<b>87</b>

### 9.2.6 Apparent Calculation Error

The calculation appears to have been done by multiplying the assumed trip generation rate by the m<sup>2</sup> GIA and then been rounded up. This is an appropriate approach. However, there appears to be an error in the calculation for the Museum Street Office figure. The GIA is 21,566 and multiplying it by the trip rate of 0.2 should give 43.13, rounded up to 44. However, the figure which appears in the table is 39, which is 5 daily deliveries less than shown in the table. Correcting this increases the number of deliveries which would need to be handled by the underground loading bays on High Holborn by 10%.

### 9.2.7 Trip Rate Assumptions

Arup have assumed a trip rate for the Retail Food element of 1.8 trips/100m<sup>2</sup> GIA. This use would previously have been Class A3 (now Class E(b)). However, Arup have usually used a higher trip rate assumption for Class A3 uses of 2.2 trips/100m<sup>2</sup> GIA. This was for example the figure used in their Masterplan for Canada Water published in 2018 where they helpfully set out their usual assumptions on trip rates for a range of Use Classes. This can be seen at <https://www.canadawatermasterplan.com/wp-content/uploads/2018/05/Masterplan-Transport-Assessment-May-2018-Part-7-of-7.pdf>

If we use this figure instead of that assumed by Arup in this case then the number of servicing trips required increases by an additional 2 per day.

### 9.2.8 Use Class Assumptions

Arup have assumed in their calculation that the Class E Flexible uses on the Ground Floor will be split 50:50 between Retail Food and Retail Non-Food. They have taken this as far as regarding a **single** unit on the corner of High Holborn and Vine Lane being split 50:50 between these two uses, giving 12m<sup>2</sup> per use. This suggests that the approach to the calculation has been entirely numeric with limited professional judgement being applied.

9.2.9 The TA also states (5.23) that *“The retail use on site will predominantly be small units, which are likely to be in the form of cafes, restaurants or bars.”*

9.2.10 Class E does not include a bar use and none of these uses are Non-Food Retail, despite the fact that the TA has assumed that 50% of the ground floor commercial use will be Non-food retail. This lack of consistency between the stated uses and the calculated assumptions is difficult to understand.

9.2.11 The TA states that all of these uses will be used for Retail Food (i.e. restaurant/café). Given the current issues in non-food retail this is indeed the most likely outcome. This is what has happened, for example, in the St. Giles development where all of the ground floor uses have become restaurants, despite the original Planning Permission requiring a mix of uses.

9.2.12 Our view is that in assessing the requirement for deliveries the most intensive use should be assumed. In this case Class E(b) (formerly A3). If we do this, using the usual Arup assumption of a trip rate of 2.2 trips/100m<sup>2</sup> GIA then we increase the number of trips required by a further 12.

**9.2.13 This takes the total number of trips required to service the development from 68 to 87, an increase of 28%.**

9.2.14 Our view is that this is a more realistic estimate of the number of trips required to carry out servicing at the development than that given in Table 11.

## 9.3 Management of Deliveries

Deliveries are proposed to be managed in 2 different ways. Those for the Museum Street and Vine Lane units are managed via an underground loading bay accessed from High Holborn. The units on High Holborn and West Central Street will be serviced from bays on Shaftesbury Avenue and Museum Street.

### 9.3.1 Museum Street/Vine Lane

The TA assumes that the deliveries to this building will be managed from the underground loading bay accessed from High Holborn via a vehicle lift. The number of deliveries assumed is 55. We believe that the figure will be higher and have estimated that it needs to be able to handle 68 deliveries, an increase of 24% as set out above.

9.3.2 The time required to enter and leave the loading bays via the lift and the assumed dwell time in the bays have not been provided in the TA and so it is not possible to assess if the proposed arrangement can manage the required number of deliveries within its proposed hours of operation (12 hours per day). There is an assumption provided that the dwell time for vehicles will range between 15 and 20 minutes. However, this is a usual assumption used for a street level loading bay. In this case there is a need for additional time to enter and leave the lift, including turning the vehicle within the limited space available at basement level. We do not believe that this has been included in the assumed dwell time.

9.3.3 If we assume the dwell time is indeed 17 minutes (average of 15 and 20 assumed in the TA) then the theoretical capacity of the 2 loading bays is 85 vehicles. This is 150% of the assumed demand in the TA, or 125% of our higher figure. At 150% the arrangements will work but at 125% it is very likely to result in issues, as this means that there is very little flexibility built into the system to allow for arrival time variability, which is an ongoing issue in Central London.

9.3.4 If in fact the dwell time excludes the time required for accessing the bays then the actual capacity will be lower. If we assume that this adds 5 minutes for entry and exit for the basement then the capacity becomes 64 vehicles. This is 116% of the TA assumption and 94% of ours. We do not believe that either of these are workable in reality.

9.3.5 We believe that more detailed information is required on the way in which this arrangement will work in practice. There needs, for example, to be more detail of the assumptions made for the time required to enter and leave the loading bays via the lift and on the dwell time required for unloading.

9.3.6 The DSP included in the appendix shows that access is only available for vehicles approaching from the West. We are unclear how vehicles which originate from the North East and East will access the Loading Bays of the Street without having to travel through Cambridge Circus or using New Compton Street to access Shaftesbury Avenue. Either route adds to congestion in the area and in the case of New Compton Street, which is heavily residential, brings significant numbers of goods vehicles into the area. This is also true for access to the Museum Street loading bay. It would be helpful if the main routes for vehicles to access these bays from different entry points to the West End was provided in the TA/DSP

9.3.7 The time required to enter and leave the bay is also needed because it will indicate how likely it is that some of the expected delivery vehicles will in fact choose not to enter the bay but will instead choose to make their deliveries without doing so, most likely using the loading bay on Museum Street. If the time to enter and leave the bay is 5 minutes and the time required to make a delivery (e.g. of a few parcels on a single trolley) is only 2 minutes then it is unlikely the driver will choose to go through the process of accessing the basement loading bays. This will then occupy the Museum Street loading bay, which may then prevent vehicles which need to use it for delivering to the part of the development which is intended to be serviced from this bay.

### **9.3.8 West Central Street/High Holborn**

Deliveries to the units on West Central Street and High Holborn are assumed to be made from the inset area on Museum Street and 2 new loading bays on Grape Street. The TA gives a demand for these bays of 13 vehicles per day. We calculate it to be 19 per day.

9.3.9 Using the dwell time assumption of 17 minutes, as before, the capacity of the 3 bays is 120 deliveries per day over a 10-hour period. The period is shorter because unlike the basement loading bays there is no opportunity for goods to be held for a time when the receiving retail use is closed. Whilst this may seem to be ample, these capacities take no account of competing uses for the bays. The Grape Street bays need to serve all of the retail uses in the new pedestrian area formed from the closure of part of Shaftesbury Avenue, including several other restaurants and 2 pubs. The bay on Museum Street will also serve as a location for PHV's waiting to pick up passengers from the office part of this development. The TA has assumed very few journeys for commuting by taxi or PHV will be made to the development but it is clear from the number of times PHV's are observed in these bays waiting for passengers leaving the Post Building that PHV use is in fact substantial in terms of bay occupancy.

9.3.10 The TA makes no attempt to estimate the likely level of current demand for these bays. It just assumes that there is space for 13 (or 19) more deliveries a day. We do not believe that this is a justifiable position. Camden's Policy document CPG – Transport section 4.16 states that where it is proposed to use an existing bay then:

*Further consideration should be given to the cumulative impact from deliveries to nearby developments. Where the proposed loading may adversely affect the existing servicing arrangements of nearby occupiers, the DSP should state the way in which conflict between deliveries will be minimised and any mitigation required.*

This has not been done in the TA/DSP. It is merely assumed that there will not be an issue.

9.3.11 Camden's Policy A1 (Managing the Impact of Development) covers servicing requirements. The explanatory notes state that:

*To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible.*

Policy T4 explicitly states that developments over T4 are expected to accommodate deliveries on site if they are over 2,500 m<sup>2</sup> but Policy A1 has no such limit in the notes.

9.3.12 We believe that it would be reasonable in this case for the deliveries to **all** of the commercial tenants in the development as a whole, including those on Museum Street, to be made from the basement loading bay, although it will need to be enlarged to be able to accommodate this. We see no reason to regard the Museum Street part of the development separately. The split seems arbitrary. For example, the High Holborn Unit is intended to be serviced from the Museum Street service bay but the unit on Vine Lane, just across from it, is serviced from the basement loading area (see Draft DSP Figures 7 & 11).

#### **9.4 Waste Management**

The approach to sizing waste management facilities, like the demand for deliveries, is based largely on the assumptions about the uses of the commercial units. As noted above there is a discrepancy in the TA between the stated uses and those assumed in the calculations. If we assume that all of the commercial units are in food retail use then the amount of waste increases by about 10%, to 66m<sup>3</sup> for 2 days storage.

9.4.1 The proposal assumes that waste for the Museum Street/Vine Lane part of the development will be handled within the basement waste store and that commercial waste from the units in the West Central Street/High Holborn part of the development will be put out on the highway for collection. The process of putting bags on streets for collection is not appropriate for a new development such as this one. The CPG Design section 8.33 is clear that *'Buildings must have off-street collection areas at ground level'*. In order to keep the area clean, we believe that a better solution is that the Facilities Management team ensures that the waste from **all** of the commercial units in the development is consolidated for collection in the basement waste store. This will remove the need for waste to be collected from West Central Street. Waste from the residential units will be managed via the 3 communal waste stores as proposed.

#### **9.5 Other Comments**

There is a recognised need to reduce the number of servicing trips required in the intensively used areas of the CAZ, including this development. The DSP sets out a number of options to achieve this type of reduction in Section 2.5. These include the following:

- Personal Delivery Deduction (sic) (we assume it should read Reduction!)
- Collective Procurement
- Nominated Carrier Scheme

9.5.1 All of these schemes can contribute to a reduction in the number of vehicles delivering to the development, especially to the office use. However, the DSP merely states that this will be encouraged. We believe that the developer needs to go further and undertake to ensure that the eventual tenants of the scheme are required, through their leases, to use these approaches wherever feasible. This can be done as part of either the Planning Conditions or the S106 Agreement. Unless there is some form of enforceable mechanism to ensure that these activities are undertaken, they will remain activities which are only encouraged rather than required, and so are unlikely to take place.

## 10 CONSTRUCTION MANAGEMENT AND NOISE

10.1 Local community groups, residents and businesses object to these proposals on the grounds that quality of life and the business viability will be seriously damaged by the proposed construction process. The severity of this damage is being exacerbated by the developer's unwillingness to consider the environmentally appropriate option of reusing the existing structure of Selkirk House in line with current best practice, rather than proposing its total demolition,

10.2 The degree of disruption that will be faced by the community will be proportionate to the length of time that work is taking place on site. By adopting a repurposing strategy for the future of Selkirk House, rather than demolishing it, the period of disruption could be drastically reduced. The application documents give the anticipated demolition and construction period as four years. This will no doubt extend to five years, which is excessive and unacceptable to the local community. (Additional benefits gain by the repurposing of Selkirk House as part of a strategy to meet Government whole life zero carbon target, is discussed elsewhere in this document).

10.3 If this project is not reconsidered and fundamental changes made to the overall brief, the local community will bear the brunt of an unwanted and unnecessary office development and will be faced with several years of continuous unwanted disruption.

10.4 Based on the experience gained from other recent major construction projects in the area, residents and businesses expect to suffer from continuous noise throughout the working day. This is often extended to include unsocial hours traffic movements as transport attempts to beat the Congestion Charge, with idling diesel lorries hovering at the site gates from 6.30am.

10.5 The dirt and dust generated on site, especially from demolition and removal of construction materials is rarely suppressed adequately and its effects on the health and well-being of those living in residential properties close-by will be profound. The risk that asbestos may be present in this dust is of particular concern. Although the site management plan refers to the requirement for essential monitoring of pollution levels, it makes no reference to the action that will be taken (and by whom) should these levels be exceeded.

10.6 We also object to the inevitable deterioration of air quality during the construction period. Whether from dust, particulate matter or nitrogen dioxide this will affect residents, businesses and visitors alike. Any business that operates using outside space, such as pubs, cafes, restaurants, will certainly suffer a loss of trade. Air pollution levels currently being monitored at the junction of High Holborn and Bloomsbury Way show that World Health Organisation safe levels are being exceeded on a regular basis. Construction traffic and site machinery, mostly powered by diesel, will add to this unacceptable pollution mix.

10.7 Children and older people will be especially vulnerable to the deleterious effects of the demolition and construction process. Sleep will be disrupted and general health and well-being all seriously affected.

10.8 For some adjoining residents in properties in West Central Street the period of construction disturbance has already started, with unsocial hours test drilling already taking place on site without any prior warning. Many close residents conduct their businesses from home and construction noise will prevent essential meetings and telephone calls from taking place, all to the detriment of their business and source of livelihood. The quality of life of these residents is likely to be so impaired that no mitigation measures will allow them to continue their way of life, without having to be moved and offered alternative accommodation.

10.9 Although boasting 'green' low carbon credentials in many sections of this planning application, this project embodies a huge array of mechanically driven noise generating plant and equipment. Numerous banks of ventilation fans, air source heat pumps, kitchen extraction plant, air source chillers and air handling units are indicated, all of which will generate noise in close proximity to neighbouring residents and all to the detriment of their overall quality of life. Again, although monitoring is promised, no indication is given on the action to be taken should the noise from these mechanical sources be deemed too high.

10.10 In summary we object to the construction and management plan for this development on the grounds of its:

1. Failure to repurpose the existing Selkirk House structure in preference to demolition and new construction.
2. Failure to follow a meaningful low carbon strategy.
3. Excessive length of the construction period of up to 5years.
4. High levels of noise generated during construction and by the proposed buildings in use.
5. Unmitigated addition to the already unsafe pollution levels.
6. Disruption to the quality of life of local residents and businesses.

## 11 HOTEL USE

11.1 LabTech contend that hotel use for the site is not economic nor appropriate and by implication imply that this is another reason to justify the demolition of the existing building.

11.2 The case put forward is that there is no market for new hotel accommodation in this part of Camden and it is uneconomic to undertake such a development.

11.3 Clearly in planning policy grounds, hotel use on this site is appropriate as Camden seeks to provide additional hotel accommodation in the Central Area and in particular in the Area of Intensification. In addition, there can be no dispute that hotel use is an established use on the site, as part of Selkirk House's last use was as a hotel.

11.4 The claim that there is no hotel market flies in the face of two hotel developments that have or are being promoted in the immediate vicinity.

11.5 The first is a hotel development called, "the Other House" located in Wellington Street WC2. This scheme contains 189 rooms and current programming is that construction will commence this autumn and the hotel will open in 2023.

11.6 The second is a 94-bed hotel proposal that entailed the change of use and redevelopment behind the facade of the old Saville Theatre in Shaftesbury Avenue, currently the Odeon Cinema. The proposal did not receive planning permission but was taken to appeal but failed. Planning permission was not granted because the existing building is listed and the proposals were considered too destructive. It certainly was not because the proposed hotel use was considered an inappropriate use merely its design. The fact that the hotel promoter took the matter to appeal would indicate a determination to achieve their aim to construct a hotel some 200m from Selkirk House.

11.7 In addition there is the 430-room hotel proposed as part of the refurbishment of the former Central School of Arts and Crafts on Southampton Row for Grange Hotels and a new 208-room hotel at 112A Great Russell Street together with the recent, very successful development of Camden's 1960s office building into The Standard, a boutique hotel, which according to the Architects' Journal has given a new lease of life to an unpromising building, applying the principle 'maximum retention of existing fabric'.

11.8 The reason LabTech are endeavouring to suggest hotel use is not appropriate and not viable is that they wish to promote the false and simplistic argument that hotels are no longer the fashion while office blocks are, ergo Selkirk House must be demolished, conveniently forgetting the fact that Selkirk House started life as a prestigious office headquarters.

For all these reasons, the grant of planning permission would be unsafe and inconsistent with the Council's and national planning policies. Save Museum Street endeavoured to engage with the applicant, LabTech, to discuss these concerns at the last pre-application community meeting and the offer was declined.



Clearly these are complex issues and we will be elaborating further on these in later submissions. In the meantime, we would be grateful if you would let us know of any further modification to the application.

## **Save Museum Street**

On behalf of:

### **Save Museum Street Campaign: led by a community coalition including:**

Bloomsbury Association  
Charlotte Street Association  
Covent Garden Area Trust  
Covent Garden Community Association  
Drury Lane Residents  
Grape Street Residents  
Leicester Square Association  
Tavistock Chambers Residents' Association  
The Bedford Estates  
Save Bloomsbury  
Seven Dials Trust  
Soho Society  
South Bloomsbury Tenants & Residents' Association  
West Central Street Residents  
Willoughby Street Residents' Association

#### ***Copies to:***

Sir Keir Starmer, MP  
Anne Clarke, GLA  
Councillor Julian Fulbrook, London Borough of Camden  
Councillor Awale Olad, London Borough of Camden  
Councillor Sabrina Francis, London Borough of Camden  
Councillor Rishi Madlani, London Borough of Camden  
Neil McDonald, London Borough of Camden  
David Fowler, London Borough of Camden  
Bloomsbury Conservation Area Advisory Committee  
Save Museum Street group members  
Local residents and businesses

## **12 ADDENDUM: POLICY NON-COMPLIANCE / INFORMATION REQUIRED**

### **12.1 Policy non-compliance**

- 1.1 Climate Change Mitigation Policies CC1 and CC2:
- 1.2 Camden Planning Guidance – Energy Efficiency and Adaptation
- 3.1.4, 3.3.5, 3.7.2, 3.7.4 Contrary to Policy D2.
- 3.7.2 D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework 2019.
- 2.2.1 Fails to meet Camden’s Housing Policies H1, H2 and H4
- 2.3.4, 7.1.2, 7.2.6 Housing – fails to meet the minimum amenity characteristics set out both in Camden Housing Design Supplement and the standards set by the GLA.
- 7.2.6 Open space - The minimum open space requirements for new housing set out in Camden’s Local Plan are not met;
- 7.3 Play space Camden’s Planning Guidance Appendix E and F.
- 9.1.6 There is insufficient detail provided on the operation of the basement loading bays
- 9.1.8 Waste on the street is non-compliant with policy
- 9.3.10 Camden’s Policy document CPG – Transport section 4.16 states that where it is proposed to use an existing bay then consideration should be given to conflict with existing occupiers.
- 9.4.1 West Central Street/High Holborn waste collection. The CPG Design section 8.33 is clear that *‘Buildings must have off-street collection areas at ground level’*

### **12.2 Further information required by Camden**

- 3.2.2 More accurate computer-generated views required from various vantage points
- 3.2.3 Analysis of the comparative shadows cast by light sources at different heights would reveal the amount of development that would be visible
- 3.4.1. Views outside Camden required. There should be consultation with the neighbouring authority, Westminster.
- 3.4.3 Additional views from Bloomsbury Square and views from Russell Square, Lincoln's Inn Fields and the eastern pavement of Drury Lane need to be requested from the applicant.
- 3.5.3 There is no visual evidence to consider the effect on Centre Point, an icon of Central London's skyline, standing in splendid isolation at St Giles Circus.
- 8.7 There is more site investigation work to be done to identify whether non-static groundwater exists.
- 9.3.5 More information on the time required to access the basement loading bays
- 9.3.6. Access to bays only available from West. Main routes for vehicles to access these bays from different entry points to the West End should be provided in the TA/DSP

### **12.3 Potential S 106 agreement**

- 9.5.1 A plan for servicing trips should be required rather than merely ‘encouraged’.