



**City Hall Greens**

**Sian Berry AM  
City Hall  
Kamal Chunchie Way  
LONDON E16 1ZE**

The Mayor  
City Hall  
Kamal Chunchie Way  
London E16 1ZE

(By email)

31 January 2024

Dear Sadiq,

**Re: Stage 2 decision for GLA/2023/0478/S1/01 and LPA ref 2023/2510/P – Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London WC1A 1JR**

Concerned constituents have been contacting me and fellow Green Assembly Members about the planning permission granted by Camden Council on 16 November 2023 for Planning Application 2023/2653/L, which is being referred to you for a Stage 2 decision.

In their communications with me, residents are asking you to direct to become the planning authority for the application and refuse it. They do so because of their concerns about the harm caused by the height of the 74 metre tower on the adjacent Bloomsbury Conservation Area and the lack of consideration for retrofit options. They believe these proposals, which will affect the heart of London's heritage, have not received the attention they deserve, unlike both the South Bank and Marks & Spencer Oxford Street projects.

Sixteen local groups from the surrounding area, including the Bloomsbury Association, Covent Garden Community Association, Leicester Square Association and The Soho Society, plus a number of individuals, came together to form the Save Museum Street coalition. It commissioned the architect and founder of consultancy Targeting Zero, Simon Sturgis, to consider the proposals from an environmental and sustainability perspective.

Sturgis, an expert witness in the recent Marks & Spencer Oxford Street planning inquiry, said there was ample evidence for local authority Camden Council to reject the application, based on national, London-wide and local planning policies prioritising retrofit. In his report, Sturgis described the carbon cost of the approved scheme as exceptionally high, with an

embodied carbon cost of 1,294 kgCO<sub>2</sub>e/m<sup>2</sup>, compared with 979 kgCO<sub>2</sub>e/m<sup>2</sup> for the previous plans submitted in 2021.<sup>1,2</sup>

The scheme fails to meet the whole life carbon benchmarks of the London Energy Transformation Initiative (LETI) and the Royal Institute of British Architects (RIBA), as well as your own. In the GLA officers' Stage 1 report, it says: "GLA officers have carried out a detailed review of the WLC assessment submitted by the applicant [and] do not yet consider that the assessment acceptably responds to Policy SI2 and the GLA's adopted WLC guidance", and "The development disappointingly falls short of the net zero-carbon target in Policy SI2."

Further, in the summary of why the application does not comply with London Plan policies on the transition to a zero-carbon economy and sustainable infrastructure, it states:

*"The applicant should provide further response for GLA officers to reach conclusion on whether an appropriately thorough exploration of alternatives to demolition has been carried out. Unresolved comments on the energy strategy, circular economy, whole life-cycle carbon, sustainable drainage / flood risk and digital infrastructure should be addressed."*

The Save Museum Street coalition also put forward an alternative proposal for the site, which does away altogether with the plans to needlessly demolish buildings and release tonnes of embodied carbon into the atmosphere.<sup>3</sup>

These proposals would retain the existing Selkirk House tower block, refurbishing and retrofitting it instead, thereby complying with the climate emergency policies at all levels of government – local, regional and national. By keeping this building, the impact on neighbouring buildings and conservation areas would be massively reduced. The plans would provide more residential accommodation, as well as a wide mix of cultural uses, enhanced tourism and greater community facilities. The construction time would also be reduced by two years, which would be huge relief for everyone who lives, works or socialises in this central London area.

As well as these strong reasons for refusal, I urge you to consider these further reasons for directing to become the planning authority for the application and refusing it.

## **1. Lack of affordable housing**

Only 12 of the total 44 residential dwellings will be for social rent (27 per cent), seven will be affordable intermediate (15 per cent) and the remaining 25 at market rate. This is contrary to London Plan Policy H6, which requires a tenure split of at least 30 per cent low-cost rent (London Affordable Rent or social rent) and at least 30 per cent intermediate. Nor do the 19

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<sup>1</sup> DSDHA's Holborn tower demolition plans under fire from zero-carbon expert, Architect's Journal, 31 Mar 2023, <https://www.architectsjournal.co.uk/news/dsdhas-holborn-tower-demolition-plans-under-fire-from-zero-carbon-expert>

<sup>2</sup> The Carbon Case for Retention and Retrofit, on behalf of Save Museum Street & Climate Emergency Camden, compiled by Simon Sturgis/Targeting Zero, Autumn 2021, [https://climateemergencycamden.files.wordpress.com/2021/10/20210929.selkirk-house\\_compressed.pdf](https://climateemergencycamden.files.wordpress.com/2021/10/20210929.selkirk-house_compressed.pdf)

<sup>3</sup> An Alternative Proposal, Presented by Save Museum Street, [https://fitzrovia.com/wp-content/uploads/2023/08/Save-Museum-St.-Alternative-Proposals\\_Approach-Aug-2023.pdf](https://fitzrovia.com/wp-content/uploads/2023/08/Save-Museum-St.-Alternative-Proposals_Approach-Aug-2023.pdf)

affordable homes meet Camden Local Plan Policy H4 which has a target of 50 per cent for schemes providing 25 or more additional homes. Likewise, the split does not meet Camden's policy guideline of 60 per cent social-affordable rented housing and 40 per cent intermediate rented housing.

Further, the amount of residential dwelling floor space does not meet Camden Council's Local Plan Policy H2, which requires that:

*"where employment led development is proposed in the Central London Area and it includes an uplift of more than 200sqm that 50% of all additional floorspace should be in the form of self-contained accommodation. The proposed employment led development for the application site will provide an uplift of 6,756sqm (GIA) of floorspace and therefore there is a requirement to provide 3,378 sqm (GIA) of this as Class C3 residential floorspace. The proposed development does not meet the policy requirement, there is a shortfall of 1,300sqm (GIA), it is providing only 61% of the policy requirement and there is a 29% shortfall."*<sup>4</sup>

## **2. Daylight, sunlight and overshadowing impacts**

The officers report to the Planning Committee at Camden recognises that three reports examining the daylight and sunlight levels of the new residential accommodation against the relevant BRE guidelines were carried out.<sup>5</sup> One was from the applicant, one from an independent lighting consultant, and the last was commissioned by local residents which also covered overshadowing to external spaces. All reports concluded that the proposed development does not provide adequate daylight/sunlight for the future occupants.

Importantly, the report notes:

*"The proportion of affordable dwellings with low daylight in all rooms is 37% (7 out of 19 dwellings) which compares to 60% (15 out of 25 dwellings) for the market dwellings."*

## **3. Historic and heritage considerations**

The GLA officers' Stage 1 report identified particular concerns about the impact on various heritage assets in the area near the proposed development. Among those considered are the British Museum, Bloomsbury Conservation Area and Setting of Bedford Square Gardens, Registered Park and Garden, Grade II\* (and the associated Grade I listed buildings around the square and in Bloomsbury Street. All these three are considered to be at risk of various levels of harm, ranging from significant, substantial and less than substantial. The report also states that: "Harm to the surrounding historic environment also remains of concern and GLA officers will make a final determination on the proposed tall building at Stage II."

Historic England (HE) has made it clear throughout the history of this planning application that it objects to it on heritage grounds. HE says:

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<sup>4</sup> Camden Council Planning Committee Public Reports Pack, 16 Nov 2023, <https://democracy.camden.gov.uk/documents/g10623/Public%20reports%20pack%2016th-Nov-2023%2019.00%20Planning%20Committee.pdf>

<sup>5</sup> Ibid.

*"The proposals would harm the [Bloomsbury] conservation area and, through their settings, multiple listed buildings by the considerable increase in the tall building's height and bulk, while new positive works of conservation to the listed buildings of the West Central Street block are set against the harmful effects of demolition and alteration."*<sup>6</sup>

On the basis of these points – and as requested by growing numbers of local residents – I strongly urge you to direct to become the local planning authority for this application and refuse it.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sian Berry', with a stylized flourish at the end.

**Sian Berry**  
**Green Party Member of the London Assembly**

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<sup>6</sup> Letter to London Borough of Camden Development Management, 28 July 2023,  
<https://camdocs.camden.gov.uk/HPRMWebDrawer/Record/10165320/file/document>