



Rt Hon Angela Rayner MP
Secretary of State
Ministry of Housing, Communities and Local Government
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CC: Matthew Pennycook MP, Minister of State (Housing, Communities and Local Government),
Ministry of Housing, Communities and Local Government
Rt Hon Ed Miliband MP, Secretary of State for Energy Security and Net Zero, Department for
Energy Security & Net Zero

21st August 2024

Dear Secretary of State,

456 - 472 Oxford Street London W1C 1AP

The future of Marks & Spencer's flagship 1929 building at Marble Arch remains centre stage in an ongoing national debate about sustainability and the future of our High Streets. The grounds for refusing the scheme have only grown in the three years since M&S made its planning submission, and there is now an unanswerable case for the new government to act in accelerating the industry's shift towards reusing, repurposing and extending buildings instead of demolishing and wasting them. Make no mistake: M&S Oxford Street is a test case.

In environmental terms, the last government made clear it would act on the significant embodied carbon emissions associated with demolition followed by replacement building. For a Labour government elected partly on its commitment to climate action and creating a zero-waste economy to fall short of this – perhaps under the misapprehension that such an approach is anti-development – would be a tragedy. Indeed, Westminster City Council is in the process of adopting a proposed new 'retrofit-first' policy, while recent research by consultants Lichfields points to eight other London boroughs bringing forward similar policies including Camden and the City of London.

Well before all of this, a report by the renowned sustainability expert Simon Sturgis – a special advisor to the UK Parliament Environmental Audit Select Committee and member of the Construction Industry Council Climate Change Committee – found that the current M&S plan (which involves the immediate release of almost 40,000 tonnes of CO2 into the atmosphere), was incompatible with the Government's commitment to reduce emissions by 68% by 2030 and achieving Net Zero by 2050, Westminster Council's declaration of climate emergency, and the GLA's policy to prioritise retrofit. It also demonstrated that a refurbishment scheme was entirely possible.

In social and heritage terms, there is huge public opposition to the M&S plan because it would destroy an elegant and important 1920s retail building to produce a large office building (with some retail). This would also damage the well-loved setting of Oxford Street and its wider West End neighbourhood.

But by no means does this groundswell of opposition equal nimbyism. In May, the re:store design ideas competition jointly organised by the Architects' Journal and SAVE Britain's Heritage and held at Ravensbourne University London, demonstrated numerous progressive and forward-thinking ways to reuse and adapt the M&S building commercially. The competition received a wide range of innovative and thoughtful ideas from architectural practices all over the UK, showing what is possible at this site and offering insight into how distressed department stores on every High Street could be repurposed and extended.

In economic terms, your government has committed to creating a zero-waste economy – in line with other countries such as the Netherlands and Belgium. As DEFRA Secretary Steve Reed said in March, such a move will have numerous benefits and could add a '£70bn boost to the economy.'

It's also important to realise that the smash-and-grab plan adopted by M&S bucks a far more sustainable trend on Oxford Street. Comprehensive retrofits such as the 1930s former DH Evans/House of Fraser building, the former Debenhams flagship store, and the former Top Shop at Oxford Circus demonstrate a more resource- and carbon-efficient approach, compatible with the UK's trajectory to Net Zero. Agile and forward-thinking property developers working in central London such as Fore Partnership and Seaforth Land will tell you that their tenants are increasingly demanding characterful commercial retrofits that 'earn the commute', not the outmoded glass and steel boxes of yesteryear, which come with a vast embodied carbon footprint attached.

Attitudes across the built environment industry are moving rapidly in favour of prioritising retrofit for climate, resource and heritage benefits. Allowing M&S to proceed with its wasteful and polluting plan is now seen as indefensible. We urge you to take this opportunity to refuse M&S's proposal and create a landmark decision in this vital area. Far from being anti-development, such a decision would be good for the development industry, good for innovation, good for heritage, and good for the climate.

Yours faithfully,

Henrietta Billings, MRTPI, director, SAVE Britain's Heritage

Marcus Binney, CBE Hon FRIBA, president, SAVE Britain's Heritage

Will Hurst, managing editor, The Architects' Journal

Bill Bryson, OBE HonFRS, author and journalist

Julia Barfield, MBE RIBA FRSA, co-founder of Marks Barfield Architects, designer of the London Eye

Kevin McCloud, MBE, presenter, Grand Designs

George Clarke, architect and broadcaster

Annalie Riches, co-founding director, Mikhail Riches Architects, winner of 2019 Stirling Prize (Goldsmith Street housing, Norwich), and contender for this year's Stirling Prize (retrofit of Park Hill estate phase 2, Sheffield)

Sanaa Shaikh, ARB RIBA, architect, educator, activist with the Architects' Climate Action Network (ACAN) and founder of Native Studio

Oriel Prizeman, MA (Cantab) AADip PhD (Cantab), professor of sustainable building conservation, Welsh School of Architecture Cardiff University

Benjamin Derbyshire, Dip Arch Cantab PPRIBA FRSA HonAIA, chair, HTA Design LLP, Historic England commissioner, president, London Forum of Amenity & Civic Societies

Rab Bennetts, founder, Bennetts Associates

Dr Michael Short, associate professor in planning, departmental postgraduate tutor programme director, MPlan City Planning, The Bartlett School of Planning, University College London

Dr Neal Shasore, head of school and chief executive, London School of Architecture

Griff Rhys Jones, OBE, president, Victorian Society and Civic Voice

Alberto Villanueva Galindo, MArch MA PGCE FHEA FRSA ARB, head of architecture, Ravensbourne University London

Simon Henley, principal of the twice RIBA Stirling Prize-nominated architecture practice Henley Halebrown

Basil Demeroutis, managing partner, FORE Partnership

Ashley Nicholson, founder, Verve Properties

Professor Ian Ritchie, CBE RA, architect, founder, Ritchie*Studio

Charles Saumarez Smith, CBE, historian, former chief executive Royal Academy, former director National Gallery and National Portrait Gallery

James Rixon, Architects Climate Action Network, Within Planetary Boundaries Studio

Sarah Wigglesworth, MBE RDI, founder, Sarah Wigglesworth Architects

Professor Andrew Saint, former general editor, The Survey of London, emeritus professor of architecture, University of Cambridge

Dr Chris Whitman, senior lecturer lead of history, Heritage and Conservation Research and Scholarship Group Welsh School of Architecture, Cardiff University, and signatory and coordinator of Heritage Declares