



Friends of St. James's Park and The Green Park

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11.11.08

For the attention of David Horkan Esq.,

Dear Rosemarie,

Planning applications under the heading 'Victoria Transport Interchange', involving demolition of existing buildings and comprehensive redevelopment of the site including new public realm and pedestrian routes and mixed use development etc submitted under the three applications

08/08205/Full - buildings 5,6b & 7a

08/08206/Full - buildings 7b & 7c

08/08207/Full - Building etc 6a

The Thorney Island Society objects to all three applications in full, finding the proposals totally unacceptable. We give here our opinion and reasons for our objections and wish the Planning Committee and the Council to be made aware of the contents of this letter.

1 INTRODUCTION

1.1 We visited the exhibition put on by Land Securities and attended a presentation by the Architects and representatives of Land Securities. Discussions were held around the model and the illustrations, observing the character and nature of the proposals. Our reactions were of great disappointment and unfavourable. We observed that much of the criteria for dissatisfaction of the previous proposals remained. We are of the opinion that the loss of the existing character and variety within the large area of destruction cannot be justified by the inadequate and over development proposed.

1.2 We were amazed by the amount of material put forward in the applications and if volume or weight was a measure of acceptability then this should be convincing. However this is not the case and we regret that amount and the complexity of the documentation. We regret this particularly since we find the 'basics' unacceptable and misguided. Because of the amount of material presented it is possible that we may have missed some subtlety, but the basics are very clear. To pursue from the outset the over burdening of the site in its context, is unwarranted except in terms of a developer seeking to maximise profits at all costs, disregarding other considerations. The physical proposals show this to be the case. The architectural forms have insufficient space about the building mass.

1.3 While considering these proposals it should be understood by the Planning Committee and the Council that our concerns have several 'dimensions' to them - of which direct commercial gain is not one; unlike the developer Land Securities. Our motivation is the concern as citizens of Westminster for the welfare of 'our' realm and particularly for Victoria, and the area covered by the proposals for wholesale demolition, and for the nature of the redevelopment intended.

1.4 When it comes to detailed comments as part of the objection there are explanations as to why the planning, architecture and treatment of transport and public realm issues are found so unacceptable. Partly in the criticism it will be realised that there are practical considerations which amount also to best practice, which the 'Team' should be aware of, or should have taken into account. If they have not done so it is their failure, and results in making the proposals completely unacceptable. There is no point in trying to persuade the onlooker that there may be less development than in the first planning application, when what is presented is over development of the worst kind, and well short of the appropriate quality of environment suitable for Westminster.

1.5 Further, we are concerned that to present the proposals under the heading as "Victoria Transport Interchange" is misleading, since there is no connection to the transport infrastructure of the underground and rail systems. The reality is that should the proposals be developed the negative effects are very great. By vastly increasing the amount of office floor space, and therefore the work force, much greater pressure on the already overwhelmed underground and public transport systems results. And unless the timing of significant infrastructure improvements are ahead of the extra commuter demand, then there is a strong probability that it will reach the point of total break down. Therefore no approvals to increase the office floor space should be granted until such time as the service infrastructure has been proportionately increased.

1.6 What is so appalling with the proposals and their planing, is that given the very large area of land take, which in essence is made into an island with only one road through part of it, the developer's team feel no sensitivity to the surroundings; and deliberately offend by the way in which the massing of the over blown development is sited. It is totally unacceptable to cause such affront to the urban and civic design in the environs of Buckingham Palace Road and Victoria Station.

1.7 We refer below to illustrations found in the following documents. The "Design and Access Statement" (Document No VTI 02; "Proposals and Design Assessment". (Townscape, Conservation and Visual Assessment Document No VTI 14C) : Design & Access Statement (Building 7a) Document VTI 06

2 SUMMARY

Our concerns include the following -

2.1 The proposals clearly demonstrate substantial over-development

2.2 The basis of the Master Plan is seriously called into question. The result of poor planning and lack of understanding or feeling for the essence of the process of redevelopment of the centre of an historic part of Westminster, contribute to the reason for the disquiet and failure of the proposals to be acceptable.

2.3 The landuse planning appears to be entirely driven by the over burdening shapes and sizes of the office development. The retail is not planned as such but required to take its disposition and shapes derived by the 'fantasy' shaping of the offices above.

2.4 There is no sense of a focus or a 'sense of place'. There is little confidence of retail use being considered as a generator; the ground space is only seen as routes passing through the development. The proposal for two sided retail paralleled along Buckingham Palace Road and the north-south route, is a problematic retail proposition, bringing with it issues of dual entry, layout, security, shop window demands and storage etc.

2.5 The nature of the planning for pedestrians and traffic especially busses was considered poor to inadequate. Major conflicts for pedestrian crossings are shown and not resolved. The presumption that a further planing application involving the redevelopment of Terminus Place would resolve some of the significant crossing points, is not an acceptable state, since it might never happen given the unpredictable issues of

timing and economics. Therefore any proposals should be conditional on resolving road crossing points and access.

2.6 The public library and affordable housing appear to be last minute additions to the plan, and are extremely poorly sited. The latter typifies the fundamental weaknesses of the master plan thinking, and the lack of true concern for community provisions

2.7 The proposals show little if any regard for the context and historical background to this central area of Westminster. The only two remaining buildings - the theatre and the pub, are not in any way enhanced by the proposals, and there is no attempt to recognise their intrinsic worth. The disinterest is markedly shown by the lack of any pavement improvement alongside the theatre where the stage door is located; no attempt to define the service lay-by for vehicles on Allington Street, and no indication of controlling the speed of traffic or safeguarding pedestrian crossing of Allington Street which remains a very busy bus, taxi, commercial access route.

2.8 The massive footprints of the office buildings, 'modelled' as huge crystalline shapes, produces vast floor plans of artificial environments.

2.9 The massing and disposition of the buildings is ungainly, with little feeling for, or provision of the public realm being anything other than routes, overshadowed and offering poor environments.

2.10 Dark passageways are created between buildings, with a proximity between facades which means there may be little or no privacy.

2.11 The quality of the natural air movement between and around the buildings because of their closeness and the roofing over of routes, is also called into question.

2.12 Claims made that the public realm was improved by the proposals are seriously challenged, not least because of the massive buildings and considerably reduced amount of space between buildings - see the ariel photograph (page 21) to clearly understand the difference between the existing and the proposals

2.13 The claim that tree planting was much increased, was severely censured since areas shown on the plans were either considered impractical or unrealisable. There was a serious lack of understanding of the size of trees and the conditions required for their survival let alone growth. The only reasonable width between buildings is in the north-south route which is roofed in its entirety. The east-west route is very narrow, has little or no sunshine, and very poor natural light penetration - yet trees were indicated on the plans.

2.14 The massive housing block running the length of Buckingham Palace Road is totally out of scale with its location is unacceptably gross in the context of the period and listed buildings opposite it.

2.15 There is little or no attempt to provide green roofs or opportunities for biodiversity; and for a site of such a size this is unacceptable. We would expect that all the major roofs included a substantial provision. So why is this not the case, given the national and local policies ?

2.16. We found the architectural expression to be cold and scale less, and the relationship to the ground and the pedestrian routes to be unsympathetic. The lack of any weather protection by canopies or the like on Victoria Street, to not only be retrograde but a major flaw in meeting retail and customer requirements and expectations.

SOME ELABORATION OF THE ABOVE ISSUES

3.1 The MODEL The model shows very clearly just how massive and out of scale the proposals are within the context of Westminster. Like some alien monster from another world. There is no 'consideration' for the location, no consideration for the two remaining buildings of the theatre and pub; and complete indifference to the real value and meaning of Public Realm. there is little open space, no greenery, and no sense of creating any 'destination' open space. The built environment for the 'office worker' offers huge unrelieved floor plans, with in many places no visibility to the outside world. In such confining office environments there is little or no opportunity to relax focal concentration, creating a tension in total artificial interior space. And in the outside world there is almost nowhere in the whole proposals for the human being to experience sun and weather; yet there is no weather protection for the pedestrian on Victoria Street.

4 PEDESTRIAN CIRCULATION

4.1 General The proposals claim that there is more penetration through the site and that there will be more light and air than in the existing development. This is not the case - see ariel photograph page 21 which shows the open nature of the existing development allowing natural air flow around the various components etc.

The pedestrian circulation will be existing Allington Street, a north-south route duplicating Buckingham Place Road, and an east-west route replacing Allington Street. The internal pedestrian routes are glazed over, and will not experience sunshine and weather. Why is this - is it for protected from potential wind turbulence ?.

4.2 The emphasis given to the north-south route is questionable from a number of aspects - the likely retail demand generated from this directional flow, seemingly being largely determined by the pull of Buckingham Palace, the Royal Parks, tourist trade and some office workers.

Given the extensive site area it would be expected that there was a planned attraction within the development, but there appears to be non envisaged. In fact the whole disposition of retail space is disturbing, there being no opportunity for a large major retailer. This coupled with the fact that the spaces are dictated by the office structures above rather than dictating their own logic, tends to be unsatisfactory.

4.3 Victoria Street Crossings The proposals are predicated on there being redevelopment of Terminus Place which may or may not happen, or could be many years later. In general that might not be significant, but in the case of this application's proposals it is a fundamental issue. Examination of the two most important pedestrian routes shows that there is no proposal of dealing with the pedestrian desire lines crossing Victoria Street - to the Underground, the railway station and bus station. We regard resolutions of the pedestrian movements across Victoria Street a prerequisite to proper consideration of the applications and without a satisfactory solution argue that on this issue the application must be rejected.

4.4 Allington Street illustration page 27 Allington Street is a major desire route in the proposals and even though it is to remain a through street to Bressenden Place carrying busses and traffic generally there is little provision to accommodate the pedestrian flow, and no apparent improvement to the very narrow pavement running the length of of the theatre and which will provide for access to proposed retail further north, the library and affordable housing. There is no recognition that the junction with Victoria Street is problematic for pedestrians now.

It should be noted that Allington Street is the one location in the entire development that will experience sunshine from the east round to the south, yet no advantage has been taken in the design, for the public realm etc.

4.5 **North South route** illustrations pages 10, 31,41,59,60, and 69 This is shown as the major pedestrian thoroughfare with a glazed roof the whole length - for weather protection. It is very heavily overshadowed by the buildings on either side and will receive little sunshine except for a limited period when the sun is due south. As the major 'public realm' area this is unfortunate. Illustrations show that there is no serious consideration as to how it might serve or be used as the only real area for public gathering. Illustration page 60 shows the route without glazed roof and shows it with only limited shadow. The route would be wide enough to allow for mature tree species and to make some real contribution to the environment - but at the height so far proposed trees would not be advisable. It has to be asked why the route is totally covered its full length

4.6 **North-South route Buckingham Palace Road** illustration page 9 and 25.
The proposals have an ambiguity with the two north-south routes. The road remains a most important route for reasons of continuity, adjacency to the west side and its retail uses; the east side for possible/probable bus stops. Yet although the presentation stated that there would be spaces for bus lay-by and some plans show trees planted, the illustration page 9 shows neither of these. Even on the ground level plan the space for trees is inadequate as shown. As pointed out elsewhere trees must be provided with sufficient space for their canopy - a fact which does not seem to be recognised in the application proposals. While there could be substantial footfall continuing along Buckingham Palace Road for the foreseeable future, not least because it offers sunshine, but also because of the access across Victoria Street to the termini. There can be difficulties where shops are two sided, as proposed, as referred to above.

4.7 **East West route** illustration page 59. It is not clear as to whether the intention is to enclose this narrow route which shows five trees - said at the presentation to be of an "appropriate species"! The illustration shows how ill considered such a proposal is. It must also be concluded that whether enclosed or not the route will be relatively dark and unlikely to receive sunshine.

4.8 **Diagonal route through Building 7a** It is understood that this route is restricted to only provide access to the office floors above and as such not available to the general public. This seems a lost opportunity from the point of view of general access to the retail at ground level and particularly from the 'desire-line' point of view. A further weakness in the circulation at the heart of the basic planning.

4.9 **Bressenden Place route** illustration page 39, 47 The traffic route remains all important, although there may at some time be bus stops. At the presentation it was said that there was provision for bus standing rather than stops. On the south side the ground floor frontage is predominantly office use; and south of the junction with Allington Street, two separated retail units are shown which will be problematic being isolated from the retail area. It is questionable as to who will use them since this is a 'back water'.

4.10 The most problematic area is that described as 'public realm' around the junction with Allington Street and at the base of building 6a. At the latter the ground floor building is set back which is attractive - but here it seems a little superfluous, although it appears that the upper floors oversail the kerb or come very close to that - it is not clear, no doubt made more difficult due to the underground route and services beneath. But the physical articulation used here could be employed elsewhere to the advantage and with benefit to the architectural ambience of other routes.

4.11 **The relationship between buildings and routes** The architectural treatment at ground floor level - adjacent to the routes shows no empathy or practical understanding of how shopping streets work best. The line of the frontages are

dominated and interrupted by the repetitious architectural features or columns as is shown on almost every illustration - for example pages 59 and 60. The exception paradoxically is for building 5 - the supposed residential block above retail, while building 6a is the only one that recognises the relationship to the public realm, as well as to retail frontage.

5 RETAIL

5.1 Retail in the centre of Westminster As far as retail planning is concerned, it can only be said that there is no retail plan as such, and one must conclude that the developer is not interested in maximising benefit from retail space. The ground floor use generally is given over to retail, as units of sometimes awkward shapes. But the layout for a substantial retail is weak since there is no 'destination' or 'pull' factor envisaged. There is no suggestion of providing a major significant store. The layout is determined by the office space buildings above, and the retail has to be subservient to that. The desired routes are conceived only as 'through' routes, and not anywhere 'to it'. There is no obvious circulation route to encourage the would be shopper to linger. There is virtually no reason to visit, nor to stay in the retail environment. Even the process of going to the library is eccentric to the retail because of the bad location of the library. The retail disposition lacks any kind of excitement: the only reason to be there is either to get through it; or as a miserable worker confined in the artificial environment office spaces above with no daylight nor fresh air, escape to seek coffee, sandwiches and a smoke ! By and large offices can be anywhere, but retail has to be where it is essential to be. This fundamental misunderstanding is the core weakness of the master planning, which is derived not from a desire subconsciously or otherwise, to create shapes, rather than satisfy basic and essential principles.

6 HOUSING

6.1 Affordable Housing - illustration page 52, 53 At the presentation we were informed that the proposals only provided 35 affordable units, and there would be a modest number elsewhere off site. The illustrations show a building which is hard to differentiate between, office, housing and library since the boundary between building 6b and 6c is not clear. It is equally unclear from the model and the illustrations as to what facilities the housing would have. In architectural terms the building seems to be an afterthought, just as the library building does. Given that the plan has been under consideration for years this section of the proposals appears the least resolved. We consider the architectural expression of the building to be very much at odds with its neighbours - the only survivors of the destruction. We cannot understand why the elevations are so lacking in empathy with the scale of the theatre.

6.2 Housing element in block 5. It has already been referred to as being monumentally out of scale with its setting, and as such unacceptable. It is in a form and style which overpowers everything on Buckingham Palace Road and designed with complete disregard for its context as the various illustrations very clearly demonstrate.

7 THE ARCHITECTURAL REPRESENTATION - building mass and volume

7.1 Buildings, 7a, 6b 6a offer no greening in the way of roof treatment. The only case put forward under environmental sustainability considerations is the treatment of heating and mechanical ventilation using heat exchange pumps. The fact is that these extremely large buildings are totally closed, require mechanical ventilation with heat and cooling provision throughout the year and the whole life of the building.

7.2 Given the nature of the planning of the three office monoliths, it is assumed that there is no ability to provide open windows for individual locations. Given that they are totally glazed, and despite the developments in glass technology, it is not the most

suitable way to control solar gain or heat loss, or to provide for individual comfort within such volumes of building. There are health issues also in confined situations. The buildings will be entirely dependant on artificial lighting throughout, and while the argument in support will be that mechanisms can be employed which change the level of illumination in response to human presence, there will still be a great presence of electric light - and this will be the case even when the natural light may be at acceptable levels.

7.3 Given human and psychological considerations the proposed working environments may even be considered inhuman especially where the largest building has an individual floor foot print approximating to 20% of the site area. To understand this, the sides of the floor plan are almost the length of Allington Street, from Victoria Street. The east-west dimension is represented by the distance on Victoria Street, from Allington Street up to and including what was the Metropole Cinema (1934), now the pizza restaurant. Or the east-west dimension for a floor is equivalent to the length of the ground floor of the west part of Cardinal Place. And the depth of the office floor would be the same. This is horrifyingly illustrated in fig 6.7 page 30 of the "Proposals and Design Assessment". (Townscape, Conservation and Visual Assessment Document No VTI 14C) This should be contrasted with the existing elevations in fig 5.6. However note that the computer generated image has distorted the horizontal dimension by increasing its length and thereby apparently reducing the actual height of the building. To understand the true dimension, see illustration fig 6.5 of the elevation of the building 7a.

8 COMMENT

8.1 The planning applications represent a tragic misuse of power through ownership to act and direct skills and talents, to give lip service to state improvements and concerns for the centre of Victoria, while in reality through the physical manifestations of the proposals demonstrate the total indifference to the heart and culture of a historically significant location. Where good at large might be achieved and demonstrated nothing proposed is acceptable. The applications are unacceptable in toto.

The proposals in these three applications are a matter of great concern as will be clear from the amount of detail that has been covered in our objection and commentary. We trust that this letter which is a formal objection to the applications will be reviewed in full, and it is asked that the matters raised regarding the three, are made known in full to the Committee.

We expect that any subsequent applications would address the points made.

Yours sincerely
for and on behalf of the Thorney Island Society

PP Tom Ball

June A Stubbs
Chairman

Enclosure :
photographs to show the impact of the proposals

Registered Charity Number : 1000751

7.4 The proposals demolish all traces of local history and evolution of this part of Westminster, and interesting architecture too which has a human scale which elsewhere would be conserved and refurbished to appropriate contemporary standards. In their place the proposals would produce scale less monoliths, of unrelieved elevations and of unsympathetic materials with no recognition of humanity.

It might be construed that as the Master Planners are KPF who are predominantly an American company it is unlikely that they would have an awareness let alone an empathy for that which is of an historic age and interest. Clearly deemed old and of no merit - and standing in the way of the new . I put it however that creative sensitive planning and architecture respects the local indigenous material and works with it, to improve the development.

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