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

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for the attention of Vincent Nally

3rd December 2012

Dear Mr Nally

Ref 12/11412/FULL TP/1737
55 Victoria Street London SW1H 0EU

Development of site including extensions at roof level and to the rear to the existing part four, part six and part nine storey building (including ground floor) to create a part eight, part 10, part 12 storey building (including ground floor). Alterations including replacement of the facade, removal of the existing rooftop building maintenance unit, works to the existing basement and associated works inducing creation of landscaping and terrace, car parking and plant equipment in association with the use of the building from offices (Class B1) on the upper floors, retail (Class A1), bank (Class A2) and (Class D1) use at ground floor level to residential (Class C3) use on the upper floors to create 54 residential units and retail (Class A1) and bank (Class A2) at ground floor level.

Thank you for sending a copy of the planning application relating to the above proposals, with your covering letter of 27 November 2012. This lavish application contains a great volume of documentation and a considerable amount of paper - the 'planing report' alone being more than 60 pages; and that is only one of 10 bound documents. We were invited to a small presentation prior to receiving a copy of the application, at which our first reactions were given. Now having the application itself we can be more clear about the proposals and our observations.

We recognise the importance of the location and are desirous of their being a building of very high quality taking account of many considerations not least the urban quality and its environment. We do not consider that that point has been reached in these proposals. We urge that the detail of the design as a residential building be reconsidered and to that end we have written in more detail than we would normally have done. It is a measure of our concern.

Central Area Policy Given that it is now an apparently acceptable Government policy to allow change of use, as in this proposal from office to residential, it does not avoid the question as to why it should be done in this case, and for whose benefit? In the interests of the community as a whole, the Planning Authority must have a view regarding the overall Central Area policy as to the justification of replacing a high profile office location at the heart of the business district, by potentially very expensive residential usage; the latter providing virtually no employment, and also in the context of other commitments to a similar change of use on Victoria Street. It would appear that no affordable housing commitment is included.

Townscape As to the townscape and design qualities, the application abounds with illustrations. But first principles of residential usage seem entirely to have been ignored. This is a very prominent site and visible from a number of vantage points. The notion of providing a 'tower corner' at the junction with Strutton Ground is plausible as a proposition. However the very basic form as proposed, with very large areas of fenestration takes on an office building appearance. The several illustrations only emphasise this (see A&D page 77). In that view how much more a part of the existing urban environment it would be, if it were in red brick?. The huge areas of 'fenestration' on all elevations of the proposals likewise emphasise an office appearance. The illustration showing this building beyond the corner of New Scotland Yard, emphasises this all the more since the appearance between the two is indistinguishable (see D&A page 77).

Partly this arises from the huge similarity of repeating areas of glass, and partly from the colour of the new brick clad structure. The illustration of the design development (see D&A page 46) shows a concept clad in reddish brick. This immediately lifts it out of the 'office genre' with distinction. And what could be more appropriate, than harmonising with the Windsor Tower opposite; with the ever present red 'colour -way' associated with Victoria Street and its environs up to and including Westminster Cathedral and the local mansion buildings; and the predecessors. See Howick Place old and new, providing that richness and identity to this part of Victoria.

Fenestration pattern But this still leaves the excessive areas of glass window - floor to ceiling whether it is a bedroom or living room, and whether it is on a sunless north facing elevation or sunny elevation on the opposite side of the building. There is no subtlety in the fenestration. Where is the ability to allow and vary ventilation to suit the occupancy of one's home and the time of day. ? Further it appears that all bedrooms are fully glazed and offer therefore no built in privacy - which is a matter of great concern There will also be aspects of climate control within the flat and how would they be dealt with ?

The fenestration pattern of rectangles in the existing elevation adds a sense of 'scale' which is missing in the bland full height sheets of glass. (See page 63 and note the contrasting two elevations and particularly the difference between the existing carefully presented use of the rectangles of glass contained in the overall rectangle). The detailed arranging of fenestration and the patterns that they will produce are a very key part of the appearance and attractiveness or otherwise of the architecture as represented by the elevations.

Balconies A further facet is the provision of balconies either within the overall volume of the building or allowed to project. A balcony offers both a real visual extension to the living space, and one which provides a psychological feeling of space beyond the four walls. The balconies shown are invariably very small - although it is not clear the actual from the information available. The coloured and detailed isometric drawing (see A&D page 64) may be accurate but seems to indicate larger area of balcony set back than the small scale plans. That elevational treatment is also different from the plans. It shows for various plans a short section of wall in line with glass on the opposite side to that shown in this three dimensional elevation.

We have spent time on the above issues since their proper and adequate solution give rise to the details of a working elevation, which is the totality of all aspects of the design process and which results in an appropriate quality.

Summary Society is very disappointed and concerned by the quality of the proposals' design for this most prestigious and important site on Victoria Street. The Society does not feel that the proposals have recognised several key issues, which we feel it should have done .

- 1 The overall appearance of the building despite it's use being changed from office to residential retains the appearance of an uninteresting office building.
- 2 The notion of a 'corner tower' is poorly handled.
- 3 The main colour of the new elevations would be much more acceptable in a warm red brick colour, being in harmony with other local architecture and including its immediate neighbour opposite. The illustration included in the Design and Access Statement shows how much quality and character the building could have.
- 4 We consider that all of the fenestration should be reassessed from a practical point of view and that that would allow the building to develop a residential identity.
- 5 We find the size and nature of the balconies in need of further consideration.

In view of the various serious considerations raised above and including our extreme disappointment arising out of the review of the proposals despite all the documentation, it is our conclusion that the elevational design needs further serious consideration. We are unable to recommend the applications acceptance The Thorney Island Society trusts that our comments will be taken into account and made known in full to the Planning Committee.

Yours sincerely
for and on behalf of The Thorney Island Society

Tom Ball

PP

June A Stubbs Chairman

55 Victoria Street

Proposals to change office use to residential. Regrettably the appearance is even more like an office.

Photographs from the application. See Design & Access Statement page numbers in brackets.



The Application in 10 documents



New Scotland Yard & 55 Victoria Street (77)



Towering over Shotton Ground (65)



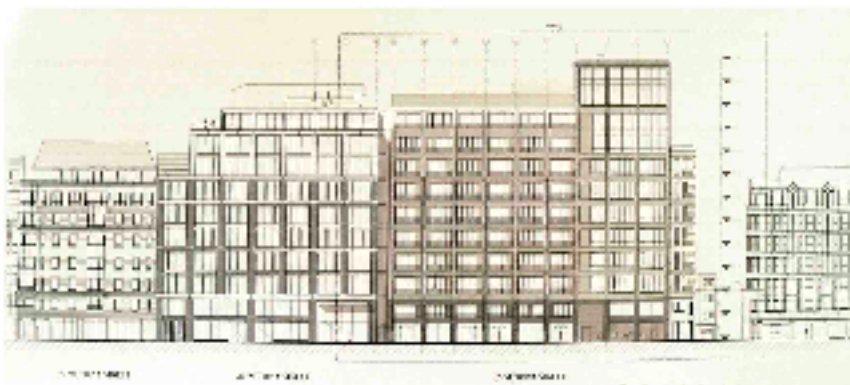
'Design development' proposed red brick (40) which would be preferable to the off-white proposal



The Proposal (63)



The added lower looks like a huge office (65)



55 Victoria Street showing the intended proposals. (56)



Detail of the new elevation windows floor to ceiling (64)



Objection
 These illustrations are referred to in the letter from The Thorney Island Society dated 3/12/12 describing reasons for rejection of the design as not being satisfactory for the prestigious site.



The existing fenestration pattern gives scale, unlike the proposal, which is scaleless. The proposal is not appropriate for residential use having no regard to ventilation or privacy. It contributes nothing to the quality of the elevation which is made to become over-massive as a daytime office use. (see page 52 for built illustrations)