



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

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For the attention of Rupert Handley Esq.,

Dear Mr Handley

11th October 2013

13/07747/FULL

**The Victoria Tower Gardens Millbank London SW1P 3YB
Erection of new education centre for the Palace of Westminster for the use of
visiting school parties and alterations to the Victoria Tower Gardens landscaping.**

The society has considered the application very carefully. As friends of St James's Park and the Green Park and also a member of the Royal Parks Friends Forum we are very concerned by any application that affects and reduces the amount of green space in any Royal Park. Above all any application such as this should be of the highest standard in relations to the existing and the ongoing proposals.

The planning application addresses the need expressed by the Palace of Westminster to have an Education Centre. The objective in providing for young people to learn about the conduct of the government is appropriate. However there is a conflict of interests. The proposed site is part of the Victoria Tower Garden and includes a number of shrubs and plants which would have to be removed. At present this 'greenery' shields the service yard to the Palace of Westminster and particularly to the House of Lords.

Impression of the proposals

The design by the architects is aimed at disguising the quite substantial building that would be built in the Garden. The substantial 'greening' of the roof and the planting to its south is to hide the new building itself. Only one significant tree remains - the Jubilee tree. Although not planted by the Queen it's presence is regarded as important and to be retained. However the proposed layout of the building and its 'green' screen in front can be seen to virtually disregard it, rather than incorporating it into the plan and landscape design

There are three other issues.

- 1) It is difficult to understand why the entrance into the new building is so far from Abingdon Street; locating it as far away as possible - virtually on the embankment.
- 2) We cannot understand why the hard paving area south of the building becomes so large, and at the junction with the embankment path has a width of some 15 m .
- 3) We do not understand why the access to the Rodin statue has been substantially changed, to provide very much reduced access : and therefore fails to give this major work appropriate significance. The existing footpath layout works well and the principles should be retained.

Detailed considerations

We consider that the design principles of the landscape, the access, and the building do not relate well to the site, and as a consequence to the Garden or the House of Lords. The Application appears to be overwhelmed by the notion that the building structure must be hidden from the south view, by any means of 'greening' - by the substantial green roof and by planting in front of it. This overall subordinates the reality to provide quality architecture and landscape within the Victoria Tower Garden. Together with proper consideration of the 'Jubilee tree' these issues should be incorporated into an all embracing whole design.

Our opinion is that the detailed planning of the building and its relationship within the Victoria Tower Garden needs to be reassessed. The arrangement of the existing footpath serving the Rodin sculpture should remain; while the very large area of the proposed arc of paving is questioned. We recommend that the application proposals be completely reconsidered. This is in part based on the intention to produce a building considered as 'temporary'. However this is not 'temporary' as in the examples of the recent Olympic buildings, but on the basis of a 10 to 15 years licence. That being the case the likelihood is that approaching the end of that period it may well be sought to extend such license.

As a building of any relatively modest size and shape as indicated in this application necessitates a large area of shrubs and vegetation to be completely removed, it therefore is of only marginal significance if the outline footprint is different from that proposed. The retained and most significant tree - the 'Jubilee tree' must be properly incorporated in the planning and the detailed design for the building. Thus the intention to provide plant material to screen the southern elevation, and also the green roof would still be developed - the difference being that both would relate to the Jubilee tree and possibly to the entrance to the Education Centre - the footprint being arranged to achieve this.

Concluding recommendation

We are of the opinion that the application and the concept of it in the application is fundamentally misguided. We consider that the concern to conceal the building and the idea of 'greenery' to hide the building has overwhelmed the proper consideration of architecture and its relation to the Garden itself. We fully appreciate why this has come about but we would ask all concerned to reconsider the design approach and the proposals.

For the reasons described above the Society while not being totally opposed to the pragmatic proposal for an Education Centre, cannot accept this application's proposals and strongly recommends that they be totally reconsidered.

We trust our observations and comments will be of assistance and ask that our comments be made known to the Committee

Yours Sincerely
for and on behalf of the Thorney Island Society

PP Tom Ball

June A Stubbs
Chairman

