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

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Ms. Rosemarie MacQueen
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64 Victoria Street
LONDON SW1E 6QP

3.11.08 For the attention of David Horkan Esq.,
PP-08/08381/Full TP/6618

Dear Rosemarie,

Selborne House 54 - 60 Victoria Street, London SW1P 4ZT

Demolition of existing building and construction of a new building over two basement levels, ground and 12 upper floors comprising retail (Classes A1.A3) at basement and ground floor and flexible office or retail space (Classes B1/A1/A3) on part of ground floor, with offices on all upper floors together with loading bay, other associated works and environmental improvements

We have reviewed the material provided and attended the exhibition on 24th October. Discussions were held with architect representatives for the proposals and points raised both for clarification as well as to point out a number of concerns.

We are very concerned by the apparent lack of a physical 'master plan' to provide guidance to new proposals and to safeguard the existing good qualities of Victoria Street.

The view is that the proposals are totally unacceptable and would be very detrimental to the quality of the built environment, particularly of Victoria Street.

We take exception to a number of aspects, which taken together conclude that as the project is gross over-development, should not be proceeded with.

We ask that our views in full be made known to the Committee; and that the planning application be rejected in toto.

Introduction

The proposals claim to be concerned to improve the public realm. This we refer to in detail later, but it is of importance that it is understood what the public understand this to refer to. It is a description for example, of the amount of space such as is enjoyed literally and visually in Victoria Street; it is the space that is distinct between the vertical presence of buildings. It is not confined to property boundary and unstated site lines. We express later our appreciation of the spaciousness of Victoria Street and all that that conveys to persons enjoying their progress through the space.

It is clear from the large amount of paper documentation that a considerable effort has been made by the designers and their team on this project. There are interesting design aspects to the physical expression of the office building and its superstructure which offer a highly ingenious manipulation to the facades.

However it is a great shame that the proposals are of such a size and mass, and must be considered over development and unacceptable due to its impact on Victoria Street. This is all the more surprising since some of the most important parameters referred to in the 'Design and Access Statement', dated September 2008, as the basis of consideration for the development, have been ignored or not met.

Under the heading 'Draft Planning Brief' on page 3. it says " key objective..... improve open space opportunities in the Victoria Area and the public realm in and adjacent to the site and improve pedestrian permeability through the site". The 'Urban character and townscape' plan shows by diagram the amount of open space surrounding the existing Selborne House. and illustrated in photographs elsewhere (page 16 and.....). 'Site Analysis' page 17 compares on a scaled diagram, the existing Victoria Street including the location of Selborne House and the proposed building.

By contrast the amount of open space about the proposed building is considerably reduced and far from being an improvement, since the building is built to the site boundary (or back line of pavement). There is a marginal increase on the west and slightly larger to the east; but the impact on to Victoria Street is very considerable. In this regard the statement of the Draft Planning Brief is not achieved, and the reduction of space on Victoria Street is considered retrograde, and far from improving the urban environment in this part of Victoria Street. This is referred to later.

Under the heading 'Design Principles' for the scheme proposal (page 21), in the paragraph referring to architectural design principles for the site, the following list is included. Of these we are concerned particularly with **B**, **C** and **D** and elaborate why we regard them not to have been satisfactorily addressed .

- A** Improve pedestrian connectivity and permeability
- B** Improve public realm,
- C** Provide a massing , height, bulk and scale responding to contextual demands of the site
- D** Respect adjacent and listed buildings
- E** Enhance and encourage accessibility
- F** Create a Class A development which will attract high quality office tenants and retail tenants
- G** Design a sustainable building

OBJECTION

1 **Objections are initially expressed briefly as follows; and substantiated below .**

- 1.1 Gross over development of the site in its location, developed to the full height on all sides and to the site perimeter (except to the east) - unlike existing Selborne House.
- 1.2 Loss of existing green area at ground level; the part green roof proposed, is welcomed for the natural habitat.
- 1.3 There is a substantial loss of 'public realm' and the perception of space at this part of Victoria Street, Buckingham Gate and Spencer Street. The loss of such visual amenity can only be regarded as a substantial loss for the community at large.
- 1.4 The massive 'overburden' on the site destroys any sense of civic design to Victoria Street. It is a substantial solid infill - rather than a building placed in its setting, as is the case of the existing Selborne House. i.e. in architectural terms there is insufficient space around the proposed building.
- 1.5 The placing of the building on the site boundary on Victoria Street, thereby bringing the facade in line with City Hall, severely affects the civic quality of Victoria Street and Buckingham Gate. (see illustrations generally, and pages 38, 52)

CONSIDERATIONS

2 **The civic/urban design of Victoria Street - architectural design considerations - a matter of policy.**

- 2.1 The existing Victoria Street from Terminus Place to Windsor House and Artillery Mansions has until the removal of Esso House and its replacement by Cardinal Place, been a street based on an architectural massing and disposition which rated it as one of the best designed 'town centre' streets, in London. It has still some references to the period which produced a master plan and a balance of heights of buildings, spaces at ground level and weather protection for pedestrians in wet weather.
- 2.2 For the public the overwhelming benefit was a street which included some green spaces, some seats and a variety of changing architectural experiences - as relative positions of buildings appeared to move during progress and give a dynamism rare in such streets.
- 2.3 Contrast the rich experience of the the upper part of Victoria Street with that between Artillery Mansions and Parliament Square. In the latter, all the buildings are built to the back line of the pavement, with rarely a gap between them unless it is at a narrow street junction. Only one building provides even a small stepping back to lift the environmental and architectural experience - at the junction with Great Smith Street.
- 2.4 Westminster City Council's 'apparent' policy favours the latter; but this is to the detriment of the street and personal environment. The public are thereby the great loser as is the civic design/urban space. This is taking away that element which is hugely beneficial to the community at large. The inference is that WCC is not seeking from developers, the creation of an improved street environment, nor acting on behalf of the community, who become victims of short-sighted and poor policy. This should not be the case; the result being an impoverishing experience for the pedestrian. It is impossible to understand the adoption of such a policy, if that is what it appears to be, very much contrasting with the significance of the earlier planning parameters for Victoria Street. This is particularly relevant in the context of what may only be termed as the 'bullying' from such developers as Land Securities. As is demonstrated here, the only interest is in maximising office space with no consideration for the civic environment and the quality of the urban environment of Victoria Street, and those who use the street thereafter.

3 The existing building - Selborne House

3.1 From the external appearance, the building is one of the most acceptable of its time and style. Following a plan of a central corridor with offices on either side, natural light is provided through well detailed elevational treatment on the north and south elevations. The building's contribution to the public realm is significant as is its positioning generally, and particularly to the neighbouring City Hall. It is a modest and competent piece of architecture of its time, restrained and therefore tending not to be appreciated in this age of 'sensational' fashion. It is these essential qualities that by contrast are missing in the proposed building, and which also by contrast highlight the design and setting of Selborne House.

THE PROPOSAL

4 The proposed Building

Traffic access

4.1 The proposal shows a 'drop-off' point on Buckingham Gate which is likely to be considered too close to the traffic signals and junction with Victoria Street under the present traffic routing.

Massing, height, bulk and scale - responding to the context of the site

4.2 Comparison and contrasts have to be made between the existing situation in total, compared with the proposals. The documents provide a reasonable collective illustration upon which the contrasts may be made. Some additional photographs are included with this objection.

The fact is that in the main the "design principles" as stated by the architects have not been met in an acceptable way. They may think that "the massing, height, bulk and scale responds to the site context" but for reasons referred to above, they manifestly fail to respond to the context, by their massing, height and bulk. All the illustrations of the building show that there is no response to the spacial qualities of Victoria Street, and that the sheer bulk and positioning of the building adversely takes the public space from Victoria Street, with all that consequentially follows. The fact is that in architectural terms, the form of the building is too big for the context of Victoria Street, and much greater consideration should be given to the proposed doubling of the existing floor space as presented in this proposal. It is simply a case of overload.

Public Realm

4.3 The point has already been made that the space about the building has been reduced considerably by the size and mass of the proposals, by development to the site boundary, on the south and north. This major loss of the public realm, is unacceptable unlike and quite contrary to the intentions and claims within the Design Access Statement,

Greening

4.4 By proposing a foot print of virtually the whole of the site, there will be no greening at ground level; a significant disbenefit when contrasted with the existing building. For the existing building, the setback and openness of the ground floor structure provide a sense of spaciousness, and affords great visibility from the pavement on Victoria Street.

Visibility at Buckingham Gate Junction

4.5 The longer views down Victoria Street, and of the Albert pub will be reduced or cease to exist; the Albert becoming only visible at the approach to the junction with Buckingham Gate - it being hidden by the new building's position, brought forward to align with City Hall. (Illustration page 38 and 29). The closeness and scale of the proposed building will dominate this junction, reducing both the visibility for road users and pedestrians alike, in contrast to the present. The massing of the building on Buckingham Gate and Spencer street has an adverse impact on the adjacent properties.

The south-east corner of the proposal provides an uplift feature which is like the 'opening jaws' of a predator shark, and totally out of scale with the Albert, which it threatens !

See the existing building for the significant difference and proposed loss of open area. The existing buildings, on the north side of Spencer Street will be seriously affected as a consequence, and it is a matter of conjecture whether they will receive any sunlight.

Our doctored photographic images highlight the true impact on Buckingham Gate and Spencer Street of the mass of the proposed building.

Canopy

4.6 The canopy along the front would be a sensible provision and for practical reasons would be welcomed. However its relationship to the curvaceous form of the proposed retail frontages is problematic - even though this is said to improve the 'public realm'.

Glazed link feature

4.7 The glazed feature between the proposed building and City Hall is unresolved and awkward. If it is intended to provide some weather protection over the 'way through' to Spencer Street and beyond, the provision should sit like a light jewel to be seen as a separate design feature between the two buildings - not as some sort of 'lean-to' where the junctions with both buildings are visually unsatisfactory. It also emphasises the disparity between the heights of the ground floors of the buildings - City Hall being

significant, the proposal being 'mean' and out of scale with its setting. Is the glazed feature proposed to mitigate any adverse wind eddies resulting between the two buildings ?

Building Appearance

4.8 The building's appearance is complex by the manipulation of the different planes of parts of the four principle elevations as well as further manipulation of the vertical plane. Such a faceted approach results in an overly clever treatment, which in turn results in visual effects which are uncomfortable to the viewer; especially in the tight confines of the verticality of City Hall and Windsor House and the other tower, the Rolls Royce building. From a practical point of view the sloping planes offer a challenge to mechanical cleaning , particularly where the elevations are sloping outwards.

The contrast between the size of the facets to an elevation - four to the South elevation for example, and the 'standard floor to floor module applied throughout the length and height is unsatisfactory. The modules are cut across differently at each floor due to the 'arbitrary' junction line of the facets. This produces a very difficult series of individual junctions and the line of the change in plane will not be a simple smooth junctions the perspective illustrations show. The proposal is overly complicated, and the two philosophies of scale - of facets and of modules, is confused in architectural design terms.

There is also the question of the height of the ground floor as presented on to Victoria Street. which is very 'mean' by contrast and comparison with City Hall and Windsor House. It does not present a scale in any way comparable, and as a base upon which there is such a mass above, is architecturally weak and visually disturbing. The horizontal banding at floor levels on the elevation, becomes incoherent above the canopy as a design element - shown differently on the perspectives from the elevation drawings. On the latter there is a more positive expression which is trying to emphasise or recognise a base for the elevation above. These differences support the view that the base of the building and the 'start' of the curtainwall treatment are unresolved. This is evident on all the elevations but particularly of concern are the south onto Victoria Street and the east on to Buckingham Gate. On the latter the slope of the soffit to the underside of the curtain wall is very disturbing.

Additional points for consideration

4.9 There is also a question to be answered as to how the water 'run off' from all elevations would be dealt with, emphasised by the varying planes and their inter sections. Is the water to be collected and recycled ?

4.10 Where the elevations lean outwards, is there a problem in the cradle cleaning mechanism being safely employed by some restraining arrangement to bring the cradle close to the window ?

4.11 While the standard office floors are shown in open plan, there will no doubt be a requirement for some subdivisions being made during the fit-out stage. This will also necessitate some corridors to provide access to the toilets.

4.12 It is not clear how the retail on the ground floor will be serviced - for deliveries and refuse collection. It would not be acceptable for such vehicles to be parked on Victoria Street, and no doubt there could be a means of servicing from The delivery bays shown on Spencer Street - but this is not indicated on the plan.

4.13 The area designated as office space on the ground floor is extensive - perhaps two thirds the area of the whole retail area. The emphasis in the elevations suggests that the corner location is very important - and in fact doors are provided here, yet these are a lon way from the lifts and security. How is this area envisaged to be used ? There is confusion between the drop off entrance and the corner entrance, and the purpose of the space and its design - both internally and externally.

The proposals in this application are a matter of great concern as will be clear from the amount of detail that has been covered here. We trust that this letter which is a formal objection to the application will be reviewed in full, and it is asked that the matters raised above are made known in full to the Committee. We expect that any subsequent application would address the points made.

Yours sincerely
for and on behalf of the Thorney Island Society

June A Stubbs
Chairman

Enclosure : original photographs to show the impact of the proposals