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THE THORNEY ISLAND SOCIETY

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

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For the attention of Matthew Mason

18th June 2011

Dear Mr. Mason

Ref 11/03853/FULL and 11/03854/FULL

Kingsgate House, 66 - 74 Victoria Street, London SW1E 6SQ

Demolition of existing building and redevelopment of the site to provide a new building of 4 basement levels, ground and 12 upper floors comprising dual/alternative retail or restaurant (Class A1/A3) floor space at basement and ground floor levels (Option A) Or dual/alternative retail or restaurant (Class A1/A3) floor space and electricity substation at basement and ground floor levels (Option B): triple/alternative office/retail/restaurant (Class B1/A1/A3 floor space at first floor level: office (Class B1) floor space from second to twelfth floor levels: mechanical plant at roof level. New area of public realm including shared surface arrangements and landscaping. new basement car and cycle parking (Application 1)

We have looked at the two applications relating to the demolition of Kingsgate House and its replacement by two buildings - West Building (Application 1) and East Building (Application 2). The applications consist of very many documents and it may be that we have overlooked an important fact or inadvertently misinterpreted some of the material. Our comments refer to the nature of the whole development proposals. We have considered the numerous illustrations presented, and in making our arguments regarding our major concerns, some have been reproduced below. We trust that our reasoning and explanations will be taken fully into consideration by the Planning Committee.

Executive Summary

1 Victoria Street is one of the the most important civic streets in Westminster City. The proposals fail to respect that, unlike the physical development it is replacing.

2 The existing plan of this part of Victoria Street is infinitely more people friendly than that which is proposed. It does not provide for people, spaces nor facilitate a good pedestrian environment, such as that in front of Kingsgate House.

3 The massing and scale of the two buildings is questionable. The height should not encroach the views from St James Park, but no analysis of this was found. The Statement concentrates attention on the view from the Queen Victoria Monument.

4 The two buildings are separated by a gap which is regarded as too narrow given the 15 storey height. The residential elevation opposite Building One will be considerably affected by the office windows opposite.

5 No detailed analysis of a wind tunnel test was found; what is the likelihood of unacceptable wind turbulence generally; but particularly between the two buildings; and between the residential tower and City Hall ? This needs to be taken very seriously, given the failures in Cardinal Place and the dubious report in relation to Selborne House.

6 The elevations are complex in detail. That to the residential 15 storey tower is visually complicated and looks like a commercial office building; there is no sense that there are any balconies.

7 The elevations are cleverly contrived with the result that they are visually disturbing. This is so for Building One, treated as three parts with the middle of each being indented. The results are that the perspective views from ground level will be disturbing.

8 We find the proposals over large, and unnecessarily complicated. The building proposals result in an unfriendly physical development not to the standard that this major civic location should expect. The increased canyon effect is very much to be regretted.

Civic significance of Victoria Street

From an urban townscape point of view, the length of Victoria Street between Bresenden place and Artillery Mansions is, vital and friendly, when contrasted with the remainder of Victoria Street from Artillery Mansions to Great Smith Street. Here the urban environment is a soulless canyon. The current policies ignore that vitality of the preferred part of Victoria Street, and is replacing 'vitality' by more 'canyon'; implementing yet more of the overcrowding and dominating building structures, as illustrated by the over large new Selborne House under construction.

The scale, massing and detailing of the replacement buildings as well as their disposition causes us great concern. We have registered our concerns previously over WCC's policies for development in Victoria Street. The policies failed to recognise the qualities of the former planning and arrangements of the buildings. These achieved a varied physical environment and public realm by the way in which buildings were arranged on the ground with set backs, rather than a continuous frontage line - the back of the pavement. In the case of the former Selborne House the green space in front, allowed the Albert Pub to be seen and enhance the street scene by its interesting architecture,.

Key location of Kingsgate House

The location of Kingsgate House is central to Westminster's most significant civic street, linking as it does Parliament, the Abbey, through Victoria Station environs, to Buckingham Palace. It's historical significance created in the age of Victoria established it as being special. The quality of this thoroughfare is therefore important to the stature of Westminster City. Proposed developments should bare that in mind if current and future generations are to be well served. That which remains of Victoria Street's previous plan recognised the status, location and its civic importance.

That plan placed buildings in such a way as to achieve an interesting public realm and urban environment. Some buildings were set back - such as Selborne House; views of Westminster Cathedral were established along with the piazza. The street was not just a route for traffic but gave pedestrians careful consideration in what was allowed to be developed - a wider pavement with large planting beds giving separation from the thoroughfare. Also provided were canopies or arcaded pavements providing weather protection - such as in Paris, Genoa and elsewhere. These simple measures lifted Victoria Street above the mundane. Regrettably what has taken place recently under planning policy, has ignored these modest but significant aspects of high quality urban environment; making the proposals inferior and less attractive in so many ways.

The Proposals

We recognise that a considerable amount of time is represented by the many documents of these applications, but regret that the end result of the proposals is an unfriendly and over bearing physical urban environment. This is at the expense of a people friendly environment. The form and intensity of building is driven not be creating well designed public realm, offering enjoyment to the many thousands of people using Victoria Street, but more likely by a specific interpretation of economic pressures and presumptions. The immediate future could have been and should be very different if it had understood and recognised the qualities of that which the two buildings are to replace.

The Canyon : future with Selborne House Kingsgate House replacement

Contrast between existing and the proposed

The essence of the physical appearance of the existing Kingsgate House is that it is set back from Victoria Street, it's simple and undramatic facade is light coloured, and together allows greater views of the sky, a 'lightening' of the environment, and optimum sunlight reflection into Victoria Street. It's ground floor retail is provided with weather protection and proper control of bright light penetration of shop windows. Along the pavement, the set back allows for seven large planting boxes with seating, offering respite from the noise and fumes of the extensive traffic flow on Victoria Street.

Photo1 existing Kingsgate House **Photo 2 proposed - the canyon effect**

Compare the illustrations looking along Victoria Street towards City Hall; Both are based on the same existing photograph. The existing **(Photo 1)** shows just how much Kingsgate House is set back, with City Hall being visible. The reflection from Kingsgate House is caught on the buildings opposite. The illustration of the replacement buildings **(Photo 2)** shows that City Hall is hidden from view, indicating just how much of the 'air volume' has been taken up by the new building. The illustration however is misleading, since in reality the new building has a darker elevation and will not be as reflective on the building opposite as the illustration suggests; it will be much darker, as will be the street environment due to the difference in reflection and the reduction in the distance between the two buildings. The canyon effect is established.

Photo 3 Existing

Photo 4 Proposed

Illustration **(Photo 3)** looks from the site of Selborne House towards Victoria Station and Cardinal Place. At present Cardinal Place can be seen. However when Kingsgate replacement buildings are built Cardinal Place cannot be seen **(Photo 4)**. This shows just how much of the public realm will have been reduced, and the overall quality of the urban environment downgraded. Is this a desirable change or improvement for the civic street : we think not.

The encroachment into the public realm is much to be regretted. The result is a much less favourable environment for the pedestrians in Victoria Street. In an attempt to ameliorate the situation, two 'breaks' in the development are proposed. One between the West Building and East Building, and one between the East Building and City Hall. The first break is a narrow slot between the two buildings, and except when the sun is directly opposite, will have reduced levels of daylight. We have included several illustrations, since it is not clear what the actual space and conditions will be. The perspective drawing Illustration **5,** gives the impression of quite a wide, well light space; but less so in **Illustration 6**. But **Illustration 7** shows the gap to be very narrow as does the long section drawing, **Illustration 8**. The latter is not an artist's interpretation but a drawing to scale showing the real conditions.

Illustration 5 perspective

Illustration 6 perspective

Illustration 7 "the slot"

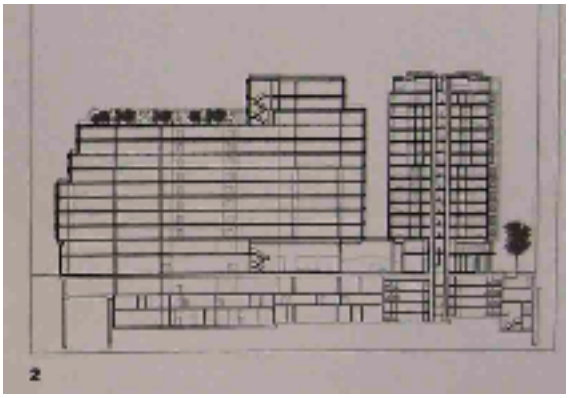

Illustration 8 - Long section

West Building **East Building** **Cty Hall**

Illustration 9 Floor Plan showing the 'break' with Office on one side flats on the other

These illustrations give valid reason for our concerns. What will the environment be like - at ground level, but particularly in the 15 storey high slot, with flats on one side and office floors opposite ? Is such close proximity, where daylight and air movements are restricted, and privacy questionable, to be accepted in Westminster's prime location. A further matter of serious concern is whether the building's dispositions and the narrowness of the gap will give rise to adverse wind turbulence at all levels ? We did not discover the wind tunnel tests. We find the proposals highly questionable to say the least.

The second 'break' - between East Building and City Hall may have a better environment, benefiting from the light reflected from the side of City Hall, it being a much lighter finish than those in the first 'break' considered above. Again we are concerned about wind turbulence in this situation. We say this particularly with the experience in Cardinal Place; and the wind tunnel tests for Selborne House which indicated the likelihood of questionable circumstances at the corner of Victoria Street and Buckingham Gate. This is a serious matter to be properly demonstrated.

Elevational treatment

The elevational treatment of both buildings is visually disturbing.
The detailing is complex and a less manipulated form would be less intrusive into the visual environment. The West Building is divided into three parts, angled and stepping forward. Each part is 'cranked' inwards. The visual effect is to make the viewer not quite sure of the building's state, since the brain's perception of the perspective is being mislead by the overly contrived presentation. The situation is exagerated by the oblique restricted view along Victoria Street. It is not asisted by the relatively dark materials and the shadows. See **Illustratiion 10** and Compare the proposals with the calm of existing Kingsgate House - **Illustration 1**.The residential East Building's elevation is over compex (or supposed subtlety) as it plays with the positions of the vertical members making it unnecessarily confusing. There is no indication that this is a residential bulding rather than another office building. The existence of some form of balcony is not obvious.

Height of buildings

Much consideration is given to the viewing of the proposals from the Queen Victoria Monument in front of Buckingham Palace. What the Society is particularly concerned with is the degree to which the proposals will be visible or otherwise from St James's Park - both when the trees are in leaf and when not. No reference was found on this point although it might have been missed in the copious documents. This was an objection made in relation to the proposed Selborne House, but which was ignored.

Illustration 10 Kingsgate House proposals - distorting perspective - concealing the East Building

Roof gardens

The proposals include roof gardens which seem to be concentrated on the West Building, rather than on the East Building which we understand is predominantly residential. Gardens as a feature we would have thought were more relevant to the residential occupants rather than the offices - although we may have missed an explanation.

The photograph of the model in the Statement, shows quite substantial growth on the roof of the West Building. The planting appears to have no wind shelter - no wall or screening against wind which raises questions of the type and acceptability of plant material being so exposed. The proposals suggested use of Acers with varying colour habits, but many are very susceptible to wind scorch as the landscape specialists will be aware. It is not the first time that planning applications have presented notional roof gardens, however few have materialised as a reality in the final scheme.

Objection - creating the oppressive canyon effect

We have considered these applications in some depth, firstly because the site is a very important and significant location; and secondly from the point of view of their acceptability in addressing the provision for the people of Westminster. The latter has been contrasted with what is to be replaced against what is proposed. We find the proposals fail and are inadequate for their location, the public realm and the urban environment. The Society greatly regrets that so much effort has gone into the proposals, and not addressed the key and basic issues, before developing the details. The priorities have not been addressed which is exceedingly disappointing. The Society rejects the applications and wishes the Planning Committee to take account of the reasoning expressed in our objection. We wish the full Council Members to be made aware of our findings in full. We invite also the Council reconsiders the policies affecting the public realm and urban design.

Yours Sincerely
for and on behalf of the Thorney Island Society

PP Tom Ball

June A Stubbs
Chairman