President: Lord Rees-Mogg Chairman: Miss June A Stubbs M.C.S.D

THE THORNEY ISLAND SOCIETY

Friends of St. James's Park and The Green Park
39 Westminster Mansions Great Smith Street London SW1P 3BP Telephone (020) 7222 2449

Ms.Rosemarie MacQueen
Strategic Director Built Environment
Development Planning Services
Department of Planning & City Development
Westminster City Hall
64 Victoria Street
LONDON SW1E 6 QP for the attention of Mike Walton
29th August 2009 by email also

Dear Rosemarie

Magistrates Court, 70 Horseferry Road, London SW1P 2AX

Demolition and redevelopment to provide residential units etc as applied to two proposals identified as Scheme ll (classical and Scheme lll (modern)
ref 09/06354/FULL TP/4556:
ref 09/0611/FULL TP/4556

We refer to your letters dated 10th and 18 th August 2009 and the enormous amount of paper and verbose documents attached. It must surely be time to insist that documents are precise and to the point, as well as presented on recycled paper. Not withstanding this quantity, information describing the comparison between the existing bulk of the Magistrates Court and that which is to replace it, is missing.

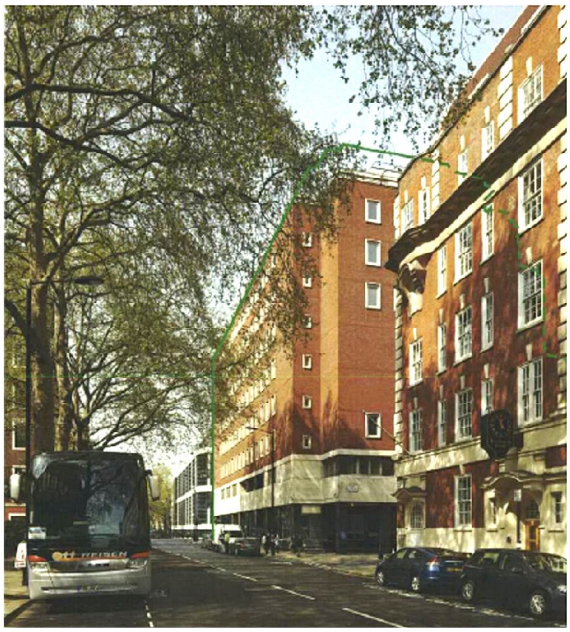
Previous objection and recommendation

In responding to these applications we refer you to our previous comments of objection made on 20th March 2007 for proposed redevelopment for residential use. PT/07/01574/Full TP/4556. In that we objected to the following

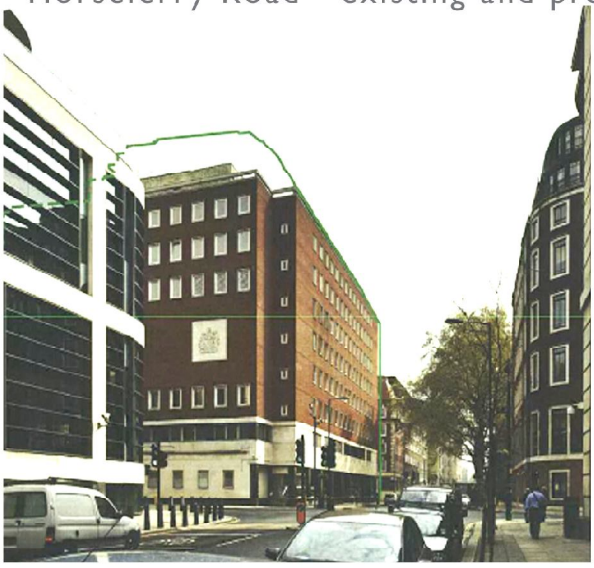
1 The overdevelopment of the site - by a larger mass than the existing Magistrates' Court;
2 The lack of open space and greening of roofs; and the almost total overshadowing the only green space of the green court on the north side of the development;
3 The advisability of providing balconies such as had successfully been provided in the Page Street development;
4 The lack of any provision of Affordable Housing included on the site;
5 The very low space standards for the dwelling units; and the fact that irrespective of the number of occupants in the flat, all kitchens were part of the living, dining space.

Objections again

We are therefore extremely concerned to find that none of these weaknesses have been addressed, to the point that the sizes of the dwelling units almost without exception are derisiably small, well below the original Parker Morris Standards, and even below the standards that English Partnership were advocating in 2007: and below the widely recognised need caused by the weaknesses which the private sector has caused to be built generally over the last ten years.



Horseferry Road - existing and proposed



Marsham Street - Existing and proposed

Horseferry Road elevation

Horseferry Road elevation

Magistrates Court - future development proposals

Brick or brick colour is not retained

Proposals look like an office complex

Illustrations based on Application submission

Thos 18.03.12

The above failings are found to more or less the same extent in both schemes. Scheme lll has by far the worst individual dwelling plans. A moments consideration allows one to recognise the too small spaces , coupled with the claim that the dwellings are for a greater occupancy level than is socially viable. A bed room of 6.5 sq m in a flat claimed to be for three people in two bed rooms, where the only other space is -kitchen - dining - living of 23.5 sq m, does not meet three peoples needs. See plot 66, Second Floor, Scheme lll. This is repeated on other floors, and is referred to here as only one example of the unacceptably poor space standards. It in turn illustrates the fact that too much is being unreasonably expected from the volume of the building.

Elevational misconceptions

The submission of two schemes with different elevational expressions, while not addressing the fundamental requirement of offering quality living accommodation, is at best a joke in very bad taste. In truth it is a desperate ploy by the developer to attempt to draw attention away from the fundamental and unacceptable weaknesses of their proposals. The so called 'classical' treatment is not acceptable because it is gross, crude and insensitive to its location. The so called 'modern' is weak because the elevations do not properly relate to the plans, and partly because the plan shapes are unresolved. The token balconies are only tokens, and the glazing pattern forced by the elevation does not suit the plan - so that windows or solid walls are often in poor positions related to the interior.

The Thorney Island Society registers its strong objection to both applications in their entirety and urge that WCC insists on basic planning standards being provided with a logical elevation as the outcome. Such space standards were originally set by WCC from the time when Parker Morris was the Town Clerk of Westminster: the Council has an historic role in seeing more appropriate standards for the present day and quality of housing being developed.

We ask that our comments 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

Enclosure : Letter of Objection dated 20.03.07

President: Sir Nicholas Underhill Chairman: Miss June A Stubbs MBE MCSD FRSA

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John Walker Esq.,
Operational Director
Development Planning
Westminster City Hall
64 Victoria Street
London SW1E 6QP By email also : southplanningteam@westminster.gov.uk

For the attention of Kimberley Davies 5th March 2012

Dear Miss Davies

Ref 12/00258/FULL

70 Horseferry Road London SW1P 2AX

Demolition of former Magistrates Court and redevelopment to provide 129 residential units at ground to tenth floor level with private balconies, terraces and rooftop gardens. Associated parking at basement and lower basement level and landscaped communal area at ground floor level fronting Romney Street. Installation of mechanical plant at tenth floor level and at roof level. Installation of solar panels at roof level.

Thank you for sending a copy of the planning application relating to the above proposal, with your letter dated 9th February 2012. The Society is familiar with the site, and very conscious of the character of this part of the Society's area of concern . We have commented on two previous applications for the site, and on both occasions registering very strong objections. Copies of these objections are included in this response, since many of the issues remain of great concern.

Previous Observations and objections

It is clear that despite the enormous amount of documentation presented, little if any of the Society's previously submitted observations have been taken into account. Our letters of the 20th March 2007 and that of 29th August 2009 complain amongst other points of the very poor space standards of the flats; including the fact that whether a flat is to accommodate 1 or 5 persons, based on the stated bed sizes quoted. All have kitchens combined with dining and sitting areas, so there is little opportunity for privacy. The space standards appear to be below those of 'Parker Morris' (the former Town Clerk of Westminster CC who set standards that were later adopted by subsequent Governments). It is questionable as to whether the space standards even match those of the London Plan; and it is advised that the Council seek verification from the Applicant on this matter, in order to conform with the London Plan..

The Elevations

We consider the design of the elevations to be out of scale with its local residential context, an din detail as a residential building. Considering the important Horseferry Road elevation, the vertical emphasis suggests three linked buildings. The actual scale of the individual flats has been suppressed by this dominance, thereby presenting a 'large' facade without any reference to human scale. The smooth vertical 'legs', grow out of the pavement while the composition is weakened by not having a defined base supporting the superstructure. As for the 'screens' in front of the balconies, these elements seem more likely to be a nuisance particularly

where balconies are very small. We do not think they add anything to the elevation rather detract from the formality proposed.

Facade material and colour

The Design and Access Statement provides pages 16 to 21 describing 'Site Analysis'. Many photographs show the abundance and prominence of brick as the external material, particularly for residential buildings. It even comments that the "predominant materials are stone and brick".

The neighbouring buildings, 'Romney House' and the listed 'Belgravia House' illustrated in several photographs are of brick. Despite that and without any explanation the Statement bluntly states "stone was chosen as a facade material in a simple ashlar random pattern". The stone is stated as "limestone". In the Statement, 'Relevant Planning History' page 24, the illustration for site work June 2011 shows the then proposed building being of brick. It is also relevant to refer to a recent application for a neighbouring building, 1A Page Street, where brick is proposed for the elevations; which is considered the appropriate medium.

Objection

It will be said that the space standards and internal arrangements are not matters for the Planning Committee. However we regard them as the 'building blocks' which make quality and lasting environment . They cause the appearance of the ultimate architecture and the social viability of this residential proposition. We consider these proposals to be over development and that the planning detail not accord with the standards that a former Town Clerk Parker Morris of Westminster CC would have found acceptable.

We consider also the lack of the inclusion of a social housing element insensitive to the needs and also the workings of a 'whole' community in the centre of Westminster.

We have previously referred to a number of other aspects which are not repeated again here, as they are in the previous letters of the Society, and which are attached and included in this letter of Objection. It is salutary that since 2007, over a period of five years virtually no improvements have been made except in the provision of balconies. It wold appear that WCC's procedures and concerns are dormant on such matters as housing standards and quality of contextual relations.

The architectural expression is alien to the historic location

The Society considers the use of Limestone for all of the elevations is alien: and in the way it has been used lacks any empathy or respect and understanding of this historic location. The Society Objects to the application's elevations on the grounds stated and cannot understand that while knowing that the 'indigenous' local preference and practice for residential use was brick, the application submitted has totally ignored this. In fact there is nothing in the way of colour or building material that relates to the 'neighbourhood, and the proposed building could be located anywhere. For the above reasons, we urge that the application be rejected in its entirety.

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

Yours Sincerely
For and on behalf of the Thorney Island Society

PP Tom Ball

June A Stubbs
Chairman

THE THORNEY ISLAND SOCIETY

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

President: Lord Rees-Mogg Registered Charity No. : 1000751 *Chairman :* Miss June A Stubbs M.C.S.D.

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Gordon Chard Esq., Director of Planning and City Development
Development Planning Services
Department of Planning and City Development
Westminster City Hall
64 Victoria Street
London SW1E 6QP

20th March 2007

For the attention of Julia Roberts

Dear Ms. Roberts

Premises: Magistrates Court, 70 Horseferry Road, London SW1P 2AX
Your Ref: PT/07/01574/FULL TP/4556

We refer to your letter dated 28th February 2007 and thank you for sending the large amount of documentation that relates to the Planning Application which we have considered. We have had the opportunity to see an exhibition in the Abbey Centre and discuss the proposals with the Developer's team. Our comments are as follows.

With regard to transport, access and location issues as well as access to the parking and its provision, we would refer you to the letter of our Vice President, Mr Owen Luder CBE, whose opinions are those of the Thorney Island Society.

Massing and appearance of the Development

We consider the bulk of the building to be too much, being too massive particularly on the Horseferry Road frontage, and would also draw attention to the fact that it encroaches more into the Marsham Street space than the existing Magistrates Court, and this alters the perspective view as well as 'crowding' more into that space. One of the stated objections to the Magistrates court was stated in Planning that the magistrates Court presented too much bulk.

We are disappointed with the appearance of the building as it provides little of interest in the elevations. The arguments that the size of the building has to conform generally with the precedents along Horseferry Road, would none the less allow for the building to be a storey lower than proposed, and with more 'articulation' of the elevations.

Lack of 'green' space

We are concerned that the so called court on the north side of the building is the only offer of any green space, and that it will receive very little sunshine; the only green space therefore will largely be in shadow for most of the time. We are very concerned that green space and features are being reduced generally in our area. Enlightened developments are including some green roofs, and it is recommended that WCC policy should urge such provision in this instance. A green roof encourages wild life, birds, insects and butterflies etc while elsewhere their habitat is being lost.

We were informed at the exhibition, that it is the intention to provide balconies to the flats overlooking the 'court' which is regarded as an improvement to the living conditions and environment generally, as well as to the elevations. We would like to see balconies in some form on all elevations, which would allow some greening to be present, and which

would assist the overall environment as well as the well-being of the future residents. This in our opinion would improve and enhance the elevations.

In urging this further consideration, we draw your attention to the relatively recent redevelopment on Page Street/Marsham Street over which there was much care and attention both from the Planners and the Architects, as a reasonable example of what could be done to lift the elevations in form, while retaining the proposed materials and colours.

Social Housing component

We are very concerned that there is no 'social' housing component included in this proposal and find the understanding that has been determined between the developer and WCC to be totally unacceptable. To provide social housing in Marylebone is of little assistance to the need in 'Thorney Island' and this part of Westminster. Time and time again it is shown that there is a great shortage of affordable accommodation for all sectors of the service industry. We are at a loss to comprehend WCC's actions in this matter.

Detailed design of the floor layout

Turning to the planning of the building itself. We are very surprised to see the low space standards which are being put forward for the individual dwelling units. The actual room sizes and proportions are small, while virtually all flats combine kitchens with the living space, whether it be a studio or a three bedroom unit. In our opinion this does not offer good useable accommodation even if the developer can sell it; a situation which arises out of high need and very low supply of accommodation.

Rooms which include 'kitchen' of ten feet width by 24 feet depth (as described by the developer's representative at the exhibition), are not large enough to serve the reasonable requirements of a two bedroom flat in which two grown ups and a young person may be expected to live. Most if not all of the kitchen areas throughout will need to have artificial illumination almost all of the time since they are so far from the only window. This is poor even if it meets the building code, but it is far from desirable, and certainly is unsatisfactory where so many of the dwellings have the same problem.

There are several flats which have what is noted as a 'study' but which have no natural light or window, and no natural ventilation. These are deemed to be ' box rooms' on this basis. The amount of artificial ventilation and extraction that will be required to service the building is far from satisfactory if one is to take Global environmental factors into account.

The detailed planning arranges the floor plans into separate sections referred to as Blocks A to E. Each part is typified by having a single lift and a single staircase which is presumed to also act as a fire escape. If the lift fails there is no alternative but to use the staircase as there is no means of accessing a lift in an adjoining block. We do not think that this is good enough in a new housing development in this day and age.

Conclusion

All the above points we have mentioned draw us to our conclusion that the proposals in physical planning terms are not well thought out and not good enough for an entirely newly created building. We urge that the Officers do not recommend the application to the Committee and that the Committee is recommended not to grant planning consent.

Yours sincerely

June A Stubbs
Chairman
Thorney Island Society