

Victoria Neighbourhood Forum

2nd Floor, 14 Buckingham Palace Road
London, SW1W 0QP

Mayor of London
London City Hall
The Queen's Walk
London
SE1 2AA

14 July 2016

Dear Mayor Khan,

Re: Redevelopment of New Scotland Yard Planning Application 15/07497/FULL 8-10 Broadway

I write as Chairman of the Victoria Neighbourhood Forum (VNF), a forum designated in accordance with the Localism Act on 21 July 2015, as the redevelopment of New Scotland Yard is on a particularly sensitive site within the Victoria Neighbourhood Area. At our General Meeting of 3 May 2016 forum members' views were that the scheme is a totally inappropriate development for its location. Architecturally, it proposes a tall and excessively massive structure that compromises the World Heritage Site of Westminster Abbey and the Palace of Westminster, a major historic asset. Objectively, it proposes a yet another unwarranted loss of employment space in favour of luxury apartments.

We congratulate you on your appointment as Mayor of London. It is understood that since coming to office, you, with your deep consideration for London, have expressed concerns as points of principle, similar to those of our members.

Your predecessor delegated his planning powers in this matter to Sir Edward Lister, Deputy Mayor and Chief of Staff, who subsequently, with respect to the redevelopment of New Scotland Yard (known as 8-10 Broadway), elected to allow Westminster Council to determine the case itself. There are aspects of Westminster Council's decision that have caused significant disquiet as they are seemingly at odds with democratic input into the planning process, with preserving London historic heritage and with securing an appropriate employment base. These aspects are summarised under the headings below.

Planning Process

The Victoria Area Planning Brief (VAPB) is particularly applicable to the Victoria Neighbourhood Area, which, according to Westminster Council; *'...provide more detailed information than can be contained in the policies themselves. They give guidance to the public, applicants and developers when making planning applications.'* and *'...do not have the same status as the policies within the Development Plan but have been subject to public consultation and are taken into account as material considerations in dealing with planning applications'*.

It is important to note that the VAPB was subject to extensive public consultation and represents the best collective views of the community, democratically determined. The VAPB pays particular attention to sensitivities of building height and massing stating:

'The council recognises the opportunities for change in Victoria however proposals must fully take into account heritage assets. Listed buildings and conservation areas will be protected and enhanced and the impact of proposals on the wider historic environment and setting of the Westminster World Heritage Site will be key when determining any application for development. The general presumption is in favour of protecting Westminster's historic assets'.

'General guidelines on maximum building heights (from ground level) likely to be acceptable to the council were generated through careful appraisal of existing (and approved) building heights, view impacts, strategic view implications and the desire to safeguard the backdrop and silhouette of significant landmark buildings'.

'Any redevelopment scheme along Victoria Street should realise a significant reduction in the height of Westminster City Hall'.

The redevelopment of New Scotland Yard has a 60% increase in GEA on the existing building. It replaces the single 20 storey building, set back from Victoria Street providing ample view penetration, with six towers at or near 20 storeys encroaching further on to Victoria Street than the existing buildings, which creates, from most angles, visually a contiguous and intrusive mass of built form.

The VAPB specifically contemplates the reduction of building height for any potential redevelopment of Westminster City Hall. Whilst the redevelopment of New Scotland Yard was not envisaged at the time of drafting the VAPB, it is wholly appropriate that this concept should be extended, particularly given proximity to one of London's premier World Heritage Sites and the fact that building height likely to be acceptable to the council for the site given in the VAPB is 40m, 8 to 10 storeys.

Of public respondents to the planning application some 85% objected, primarily on the basis of the developments height, mass and proximity to the Westminster Abbey, with the balance merely neutral and not supportive. Of the two registered Amenity Societies, The Thorney Island Society objected and The Westminster Society was supportive. However subsequently the Westminster Society's News Letter reports that *'...we are all guilty of having muffed on this one..'*

In making its decision Westminster Council viewed the proposal an improvement over the existing situation and determined that the guidance in the VAPB did not justify refusal. Whilst acknowledging public objections, Westminster Council gave no specific address to concerns raised. The Council also chose to overlook the non-compliance with the London Plan on reduction in CO2 emissions and did not impose off site offsetting of the excess 150 tonnes of CO2 per annum on the grounds that it has no policy on carbon off setting.

Set in the context of the threat to the World Heritage Site (dealt with below) and the overwhelming public objection to the scheme, the members of the Forum are dismayed at this dismissal of the very parameters that should have framed the scheme's design from the outset. As a result we have yet another presentation of a tall and massive development in an inappropriate location that is undermining London's heritage, environment and employment provision

London's Historic Assets

The VAPB was specifically crafted to ensure that there would be absolutely no impact on Westminster Abbey. Sharing widely held concerns that the new scheme could affect the World Heritage status of the Abbey and Palace of Westminster the VNF contacted UNESCO's UK representatives who advised that they had not been consulted with respect to the proposed development. They advised, however, that a delegation was due to visit London later in the year to review London's World Heritage listings. Historic England on their part raised significant concerns with the proposed development, particularly as they had not been consulted in the pre-planning stage of the development, including:

'...the new development would add to the canyoning effect that is already taking place with recent development, which may have undesirable impacts on the setting of nearby heritage assets.'

'...in views from County Hall, there would be some massing effect at the foot of the Houses of Parliament resulting from the development, which would likely cause some minor harm to the silhouette of the complex within the World Heritage site by visually filling the space around Parliament Square and the nearer development lining Victoria Embankment. Those views from in or around Parliament Square itself also show some intrusion on the form of the Abbey (grade 1), Methodist Central Hall (grade II) and The Sanctuary (grade II) where the interplay of rooflines with a currently more open aspect south west along Victoria Street would be impeded by the more southern elements of the proposed development.'*

'The views analysis submitted with the application identifies a number of additional views in which the development would be visible and provides a summary of the magnitude of harm that would result. In nearly all cases, the impact of the development is classified as beneficial. We disagree with this assessment within some of these views (which were presumably agreed with the City of Westminster during pre-application negotiations?)...'

'... some harm is likely to be caused to designated heritage assets, and that a reduction in the height and massing, in particular of the southern most blocks might reduce this harm. We therefore recommend that the proposals are further interrogated to determine whether the harm can be further mitigated'

In making its determination Westminster Council assessed the new development as not significantly worse than the existing complex and as such the concerns of English Heritage could be discarded. This is not a position shared by the respondents to the planning application.

Employment

New Scotland Yard occupies a key location within a designated Central Activities Zone (CAZ), where Westminster Council acknowledges that conversion of office to residential has led to an under supply of office accommodation that is eroding the character of commercial areas. To address this, Westminster Council has determined that from 1 September 2015 interim measures would be applied with housing no longer acceptable where it results in the loss of office floor space.

The redevelopment of New Scotland Yard results in the net loss of 34,326 sq. m. of office floor space in favour of luxury accommodation. In considering this matter Westminster Council determined that as the planning application was submitted in August 2015, and therefore, technically prior to 1 September 2015, the interim measures should not be taken into consideration.

As Westminster Council is fully aware of CAZ requirements, the pressure on office space and its own emerging policies, approval of this proposed redevelopment seems irrational to say the least. Indeed, Westminster Council would (or should) have been aware of the oversupply of high value accommodation in the Victoria area: that the existing office space is to be replaced by even more such accommodation, makes this approval not just irrational but bizarre.

Summary.

Given the seriousness of the issues set out above, you may wish to take up with Westminster Council whether this proposed redevelopment is in the overall interests of London.

We would suggest that as a minimum the development is put on hold until there is a thorough review by UNESCO, English Heritage and Westminster Abbey officials to determine whether Westminster Council's consideration with respect to the development's lack of impact on the Abbey and Place of Westminster is valid or if there is a genuine threat to London's historic asset. During this period, we would also recommend that the ratio of office use to residential use be re-assessed to fall into line with the requirements demanded of the Victoria Area

Should you be minded and able to do so, action to remedy what could be considered a highly contentious planning approval, to deliver a scheme in line with the VAPB, preserve office accommodation and improve the environment, would have considerable public support.

Yours sincerely

Brian Miller
Chairman

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