

Planning Application for 79-87 Westminster Bridge Road.

SoWN response

November 2020

Southbank and Waterloo Neighbours have given a great deal of consideration to the proposals for the redevelopment of 79-87 Westminster Bridge Road.

As a member of SoWN, the positive contribution made by the Park Plaza Hotel group in the local community is greatly appreciated and the economic benefits that these proposals could bring are acknowledged. However, there are serious concerns over fundamental aspects of the design in its current form to which SoWN feels it must object.

The Neighbourhood Plan is supportive of development that celebrates the character of the neighbourhood, minimises negative impacts on the surrounding community and contributes to a walkable, liveable and functional public realm. It expects development to respect heritage and character and to be related to context.

In its form and massing, the proposals for 79-87 Westminster Bridge Road sadly do not follow these principles. We believe that this building would cause harm to the character of the neighbourhood and to the experience of the people living and working in it.

Heritage

Although the site is now empty, its footprint clearly reflects the line of the previous buildings in this location. This building line is important as it provides a continuity with the past and contributes to an understanding of how the area has developed, as noted in the Townscape and Heritage Assessment:

*The site has few original surviving neighbouring buildings. However the surrounding building stock, by means of its fabric, design and appearance, is a record of social and economic change and lifestyles in this part of London, telling a story of how the area evolved from earliest times until the present day. The section of street in which the site is situated reflects the **earliest street layout**.*

The previous buildings on the site were around 4 storeys high and shared a continuous front building line with the neighbouring properties, defining this block of buildings as a terrace. The block has a swept building line that follows a smooth curve connecting these two roads.

The continuity of this terrace was harmed first by the demolition of the previous building on the site (the Anderson drapery building) and subsequently by a significant amount of WW2 bomb damage. Whilst the rebuilding of the street in the second half of the twentieth century has resulted in a range of building styles and slight variations in height, between 4 and 7 storeys, none of this has impacted on the reading of the street as a terrace of buildings, with a gap that needed to be repaired.

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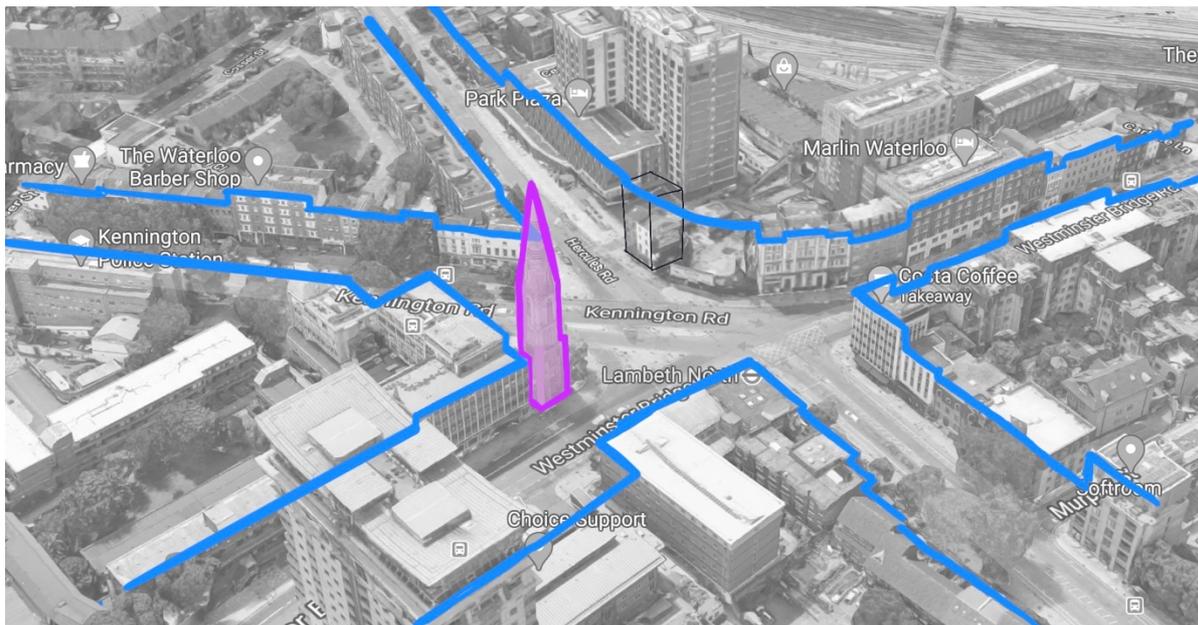
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Character

The defining characteristic of this junction is that it is a meeting point of 5 roads, with urban blocks of buildings following the geometry of the roads. At the junction, the streetscape is composed of buildings with a relatively consistent height, ranging between 3 and 7 storeys, the tallest building being the Point A hotel (although its notable that the top floor is set back from the facade, and so the dominant eaves line is at 6 storeys).

The only structure at the junction which is higher is the Grade 2 listed Lincoln spire. Its setting as the tallest structure at the junction rising over the lower buildings is consistent with its original purpose, as a church spire, and is befitting of its contemporary relevance as a memorial to the abolition of slavery.

The architect has said in their Design and Access Statement that there is a general increase in building height towards this junction, but this is not borne out by any detailed assessment. It is only the Lincoln Tower that stands out by being different to the pervading height. The other taller buildings in the vicinity are either located at some distance away from the junction or – in the case of the existing Park Plaza Building - set well back from the street frontages.



Opportunity

The principle of developing this site is well supported, and this was the clear response in the public consultation carried out for this project. In accordance with the council's policy on Urban design, the proposals do seek to maintain the building line, which is also well supported. There is no doubt that the sense of place and quality of public realm would be improved with a well considered new building in this location.

But the starting point for the massing of a new development in a gap site in a terrace of buildings should be its relationship with the scale and detail of the adjacent properties in the terrace. As there is no consistency to the height of the adjacent properties, a slightly higher building which respects the streetscape could be justified.

The Applicant's Townscape and Heritage Assessment appeared to agree:

*It is considered that the prominent corner gap site of Nos. 79-87 Westminster Bridge Road - whilst outside of the conservation area - presents an opportunity for enhancement where new buildings which could accommodate development (sic) that is **slightly** taller than its immediate neighbours but still respectful of the conservation area.*

This was also the Council's view when giving pre-application advice relating to the neighbouring property (2-4 Hercules Road) which is also a part of the same terrace of buildings:

Important to the proposed scheme are the following identified key design constraints:

The consistent building height along the street frontages from Hercules Road (north side) through to Westminster Bridge Road (south side), which vary from five to eight floors; a height that has been retained and reinforced with the new developments. Higher building elements are set well back from the main street frontages.

Taking these constraints and related design policies into account, you are advised as follows:

Streetscape. Council would seek to retain the dominant form of the surrounding streetscape. It is Officer's opinion that the proposed building (10 storey height) should be reduced in height by four floors, although a reduction of three floors may receive Officer support if it can be demonstrated that the design response enhances the streetscape and respects the prevailing building height from the south side of WBR around to the west side of Hercules Road.

In light of the above assessment, there are a number of concerns and points of conflict with relevant Council's policy; in particular are the impact of the height of proposed building on the streetscene.

Proposed Height

At over 15 storeys (a height of around 55m) it is our view that these proposals do not respect and acknowledge the local urban grain, and that they are contrary to local and national policy.

The Statement of Community Involvement confirmed that 'A majority of people giving feedback to the consultation were opposed to the height of the building.' It goes on to say that 'very few of the comments gave clear reasons for their opposition' but that is no reason to reduce the weight given to this feedback.

The impact of a building of this scale will be felt directly in the overshadowing of public space, the loss of sky in views and the dominance over the public realm and indirectly in its setting of a precedent for future developments.

Neighbouring property

It is also disappointing that the proposals do not relate to the adjacent locally listed building at 89-95 Westminster Bridge Road. Although the Townscape and Heritage Assessment acknowledges its importance, there is no description of its qualities and no attempt to explain how the proposals respect it, either in its overall massing or in its detailed design.

In the proposed development of 89-95 Westminster Bridge Road currently being assessed, the building's elevation will be completely restored, with the building roofline maintained, which will enhance the public realm in this location.

The architect states in the Design and Access Statement that

The architectural treatment of the proposal has been further refined to tie into datum lines of adjacent buildings at the junction helping to integrate the proposal into the immediate context

But unfortunately, an analysis of the design shows no evidence at all of the design integration being claimed and this lack of relationship would harm an appreciation of this important building.



Public Realm

The public realm at this important junction could definitely be improved by a considered new building on this site. However, the proposed arches to the lower floors of the elevation, at over 8m tall, are completely out of keeping with the surrounding streetscape. In seeking to dominate the scene visually, they will reduce the possibility for coherence of the public realm and sense of place.

It's claimed that the retail space is 'inherently flexible' but this would be compromised by the double height (8m tall) zone at the frontage linking it to the office floor above. The 900mm high concrete stall riser to 3 of the 5 bays and the circulation through the space to the office floors would also limit flexibility and the potential to sub-divide or to incorporate any other uses in the future.

The improvements proposed to the Public Realm of Newnham Terrace are of course welcomed, but these are of limited benefit to the wider community and primarily for the benefit of customers of the hotel.

Appendix 1 - Tall Building Policy

Whilst Lambeth need to judge the merits of the scheme against all current policy considerations, we do not see how the main Tall Building policies referred to in the Applicant's Planning Statement support the principle of building a tall building on this site is not supported.

In fact, Lambeth even identify this location specifically as a site which is not appropriate for a tall building.

Policy Q26 of the Lambeth Draft Local Plan states

*a) Having particular regard to the international obligation to preserve the OUV of the Westminster World Heritage Site and taking into account the desirability of preserving the settings of heritage assets, proposals for tall buildings will be supported where they **are** in locations identified as appropriate for tall buildings in Annex 11*

This site is **not** identified as appropriate in Annex 11. In fact, the Lambeth Tall Building Topic Paper (November 2019) states that this location was specifically discounted from the Annex:

*Tall building development on Lambeth North LU Station and on the gap site at 79-87 Westminster Bridge Road (corner of Hercules Road) were both **discounted** because of the adverse impact that would result to (i) the setting of the Lower Marsh Conservation Area (5) in views from the NE and (ii) on the adjoining Grade II listed Lincoln Tower (in views from every direction) and because of the likely adverse impact on the locally significant view (Policy Q25 (b) (2) (i)).*

In their planning statement, DP9 look to find support for the principle of a tall building on this site by reference to the London Plan (Policy 7.7), the Intend to Publish London Plan (Policy D9) and the Lambeth Local Plan (Policy Q26).

Section 6.41 of the DP9 Planning Statement says that

*'It is important to note that Policy 7.7 of the London Plan at a strategic level requires tall or large buildings to be part of a **'plan-led approach'** to changing or developing an area by the identification of appropriate and sensitive locations. The location of the site at a major road junction does provide some justification for a taller building, as it has the potential to successfully terminate views along the main roads.'*

This may be true, but it is a long way from explaining how they believe this proposal has in any way been 'plan-led', with the implication that it has been extensively consulted on and considered alongside a range of other plan related issues.

Section 6.43 of the DP9 Planning Statement says,

'The principle of a tall building in this location is supported by the London Plan Policy 7.7, which requires tall buildings to be generally limited to Sites within the CAZ, Opportunity Areas, areas of intensification or town centres, that have good access to public transport.'

This statement implies that the policy wholly supports the principle of a tall building in this location for this reason, whereas the reality is that this is just one of the criteria that the project needs to meet. The justifications explaining how the other criteria have been met are far from clear, particularly the two on the subject of scale:

London Plan Policy 7.7

Tall and large buildings should:

b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building

DP9 Planning Statement

'The scale and character of the proposed building would be appropriate to its location and become a visually prominent feature of this part of Waterloo, marking its location in a way that is wholly commensurate with the significance of that location and where a distinctive tall building is appropriate. The place-making potential of the scheme is very clear.'

The Statement does not in any way convey the Applicants understanding of the character of the area, and makes no reference to the scale, mass or bulk of the tall building proposed. Marking a location does not mean that the building is not affecting an area adversely.

c relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;

DP9 Planning Statement

'The scheme will be 'visually interesting, well detailed, well-proportioned with adequate detailing/architectural interest'. It will be an excellent example of development which has 'a bulk, scale/mass, siting, building line and orientation which adequately preserves or enhances the prevailing local character' and is a very specific instance of 'regeneration and opportunity areas where the context is changing' and 'it respects and contributes towards the intended future character of the area'

Preserving the significance and setting of the Grade II listed Lincoln Tower at this junction have been an important consideration during the design development and material selection process.

The proposed massing is intended to be calm and the bulk minimised, so it does not compete with the spire and to maintain the spire height as the dominant height at the junction.'

The explanation is a collection of quotes from various policies, none of which explain how *this* building design actually relates well to the specific surrounding characteristics. The particular reference to street level relationships in the London Plan is not addressed at all.

On the Intend to Publish London Plan, Section 6.42 of the Planning Statement says:

'Policy D9 in the Intend to Public London Plan also sets out criteria where tall and large buildings will be considered acceptable, in principle. This includes the need to "incorporate the highest standards of architecture and materials, including sustainable design and construction practices...[to]...have ground floor activities that provide a positive relationship to the

surrounding streets ... [to] ... contribute to improving the permeability of the site and wider area, where possible ... [and to] ... make a significant contribution to local regeneration". There is also a requirement for proposed tall buildings to be assessed in terms of potential adverse effects on their surroundings in terms of microclimate, wind turbulence, overshadowing and noise.'

What it doesn't reference is the over-riding section on Location within the Policy D9, which says

- 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.*
- 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.*
- 3) Tall buildings should **only** be developed in locations that are identified in Development Plans.*