

7 December 2021

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Development Planning
Westminster City Council
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Dear Sir/Madam

UNITED KINGDOM HOUSE 2A Great Titchfield St, London W1W 6SP)
Application for planning permission and listed building consent for replacement windows at levels 1-5
Planning Portal ref: PP-10460151

On behalf of our client, Flametree Properties Ltd, we hereby submit an application for Planning Permission and Listed Building Consent for replacement windows at 1F to 5F levels of UK House.

I would propose the following description:

Replacement of windows with double-glazed metal and double-glazed timber units.

This description is based on separate applications that have already been submitted for replacement windows on 6F and 7F levels (WCC refs 21/06434/LBC and 21/00609/FULL). These applications were due for decision by 22 November; we have decided to proceed with the current application for the rest of the building in anticipation of a positive outcome on the as yet undetermined applications for 6F and 7F levels.

The online application is accompanied by the following documents:

- Site location plan
- Existing and proposed drawings
- Design and Access Statement
- Heritage Statement

This letter sets out the planning background to the proposals and is largely a restatement of that provided on the 6F and 7F levels applications.

Background

United Kingdom House is a Grade II Listed building dating back to the early 1900s (see Appendix 1 for the list description). In the 1970s the building was extensively redeveloped behind a retained façade to create conventional 1970s office space on the upper levels (two to seven), disposed around two naturally-vented light wells. Large retail units occupy the ground and first floors and part basement. Car parking, storage and plant rooms occupy the remaining basement space.

The total floorspace of UK House is approximately 20,900m² (GEA), of which 14,770m² is in B1 office use and the remaining 6,130m² in retail use.

The accompanying Design and Access Statement (tp bennett) describes the historical evolution of the building from the original Waring and Gillow store and the very radical changes undertaken in the late 1970s to a Seifert and Partners design. These changes essentially retained the Oxford Street and Great Titchfield Street frontages, at least above ground floor level, with essentially a replacement building behind, with modern façades on Eastcastle Street and Winsley Street.

The surrounding area and heritage context

UK House occupies a complete urban block fronting Oxford Street to the south, with Eastcastle Street to the north, Great Titchfield Street (west) and Winsley Street (east).

It is also in the East Marylebone Conservation Area. The Conservation Area (CA) encompasses the streets to the north of Oxford Street and east of the Portland Place Conservation Area. WCC's Conservation Area Appraisal (CAA) acknowledges the diversity of building styles in East Marylebone. It describes UK House as follows:

164-182 Oxford Street. As one of the largest buildings to this part of Oxford Street, 164-182 has an exuberant front in red brick with Baroque detailing. The former Waring and Gillow showroom by R. Frank Atkinson, it was built between 1901 and 1906; with an extension of 1933. Reconstructed as offices over shops by R. Seifert & Partners, 1977-8, with new elevations to the north-east angle.

The detailed Heritage Appraisal by KMHeritage (which previously accompanied the 2014 scheme) confirms that the special architectural and historic interest of United Kingdom House has to do with its surviving Edwardian exterior, found facing Oxford Street and Great Titchfield Street, and in the short returns of original elevation on Eastcastle Street and Winsley Street, and therefore includes those parts of the elevations to which this application for planning permission and listed building consent relate.

Planning history

The main elements of the site's planning history are set out in Appendix 2. In summary:

- Permission was granted in 2014 for partial infilling of internal lightwells at 2F-7F for office use with 8F extension for residential use with associated GF changes (the so-called Dyer Permission)
- Subsequent separation of the permission for office lightwell extensions from the 8F residential extension (in part reflecting access as office tenancies allowed)
- Permission/LBC for various GF façade in 2017
- Amended office lightwell extensions (4F-7F) and residential 8F extension permitted in 2018 (the 2018 permission)
- GF and basement alterations to create retail space granted in 2018
- Creation of new retail frontages more sympathetic with original building on Great Titchfield and Winsley Street frontages and change of use of retail to office entrance granted in 2019 (and subject to minor amendment in a current application)
- As noted above, there are current planning and listed building consent applications for replacement windows and 6F and 7F levels that await determination

In short, the owner has embarked on a series of major investment in the building involving internal office extension, a roof-top residential extension, and various ground floor façade changes reflecting the internal changes and more in sympathy with the original building.

Policy considerations

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides as follows:

In considering whether to grant planning permission...for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

This is reflected in Westminster's City Plan 2019-2040 [WCP] (adopted 21 April 2021):
Policy 39 Westminster's Heritage states:

LISTED BUILDINGS

G. Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric.

The application proposals

The current application reflects the ongoing gradual improvements to the building. The proposals involve the like for like replacement of windows at 1F to 5F levels. As noted above, earlier applications for 6F and 7F were submitted prior to occupation by a new tenant.

The principal motivation for the proposals is to improve environmental and acoustic performance of the existing single-glazed windows, reducing reliance on mechanical heating and cooling and providing for the next period of the building's life. The materials and appearance will be unchanged other than some minor increase in the sectional profile of frames and glazing bars. Full details are shown on the submitted drawings for each of the window types present. In summary, three types of window are involved (noting that most will not now be openable):

- Crittal double-glazed fixed casements, painted black with white-painted wooden frames and set within a masonry wall, being part of the original elevations to Oxford Street, Great Titchfield Street and parts of Eastcastle and Winsley Street (including example types C, C1 and D)
- Wooden double-glazed casements, painted white set within parts of the original elevations (including example types S and Q)
- double-glazed aluminium-framed fixed casement windows, set within the Eastcastle and Winsley Street façades (including example types T1, T2, T3 and T4)

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Note that not all window types have been shown in the proposed drawings given the close similarity between the differing types. The details will be replicated for all windows in these elevations.

The aesthetic appearance of the window will be essentially unchanged and certainly not perceived from ground level. The changes are wholly sympathetic to the appearance of the listed building and will protect its significance, not least by improving the standard of the office accommodation on these floors, helping to conserve the building's continued occupation into the future.

The proposals therefore meet the statutory test in s66(1) of the 1990 Act and fully meet the requirements of WCP Policy 39G by preserving the building's special interest in a manner that is sensitive to the architectural detail of the building and restoring original detail at least in line with the 1970s Seifert interventions.

I look forward to receiving confirmation of validation in due course.

Yours faithfully

Mike Ibbott
Director
for **tp bennett**

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APPENDIX 1: UK HOUSE - LIST DESCRIPTION

TQ 2981 SE CITY OF WESTMINSTER OXFORD STREET W1 (south side) 57/20 Nos. 164 to 182 15.6.73. (even) - II Former department store, now offices. 1905-06 by Frank Atkinson with advice from R. Norman Shaw (viz. R.A. Library drawing) for Waring and Gillow's. Red brick and lavish stone dressings, slate roof, in a free Renaissance with riotous application of Hampton Court inspired "Wrenaissance" details well suited to the Empire-wide pretensions of the store. 4 lofty storeys (including ground floor/mezzanine podium) and 2 tiers of dormered attics in steep hipped roof with centre bay of 11 windows raised to 5 storeys under segmental pediment; return elevations with similar detailing run back to plainer rear on Eastcastle Street. Ground floor display windows bronze framed and articulated with mezzanine by stone arcade. Upper floors have elaborately carved stone window surrounds, those on 3rd floor as giant oeil-de-boeuf with foliage enrichment; arcaded top floor. Deeply carved and projecting modillion eaves cornice.

Listing NGR: TQ2922181319

**APPENDIX 2:
 UK HOUSE – SUMMARY PLANNING HISTORY**

Reference	Description of development	Decision/date
12/10820/FULL 12/10821/LBC (The Dyer permission)	Infilling of internal lightwells at second to seventh floor level in association with the existing office use (Class B1), creation of extension at roof level to provide an eighth floor level for use as residential (Class C3) comprising 2x2 and 2x3 bedroom flats with associated terraces; installation of plant enclosure at eighth floor level; creation of separate ground floor entrance on Great Titchfield Street for residential access and associated internal alterations.	Permitted 28.3.14 Now lapsed
14/03241/FULL 14/03242/LBC	Installation of cantilevered walkways at eighth floor level across existing light wells.	Permitted 2.6.14 Renewed under refs 17/04816/FULL and 17/04817/LBC 12.7.17
14/12208/FULL	Infilling of internal lightwells at second to seventh floor levels to provide additional office space (Class B1), extension at eighth floor roof level to provide single residential dwelling (Class C3) flat with associated terraces, new plant enclosure at eighth floor level and creation of separate ground floor entrance on Great Titchfield Street for residential access and associated internal alterations.	Refused 2.6.15 NB related LBC (below) granted
14/12209/LBC	Infilling of internal lightwells at second to seventh floor level, extension at 8th	Permitted 2.6.15

	floor roof level including new plant enclosure and terraces, creation of separate ground floor entrance on Great Titchfield Street and associated internal alterations.	
15/09831/FULL 15/09832/LBC (The 2016 permission)	Infilling of internal lightwells at second floor level to create additional office space (Class B1) together with extension at roof level to provide a new eighth floor level comprising 2 residential units with part mezzanine (Use Class C3) on the front part and additional office space (Class B1) on the rear part and minor internal alterations and new residential entrance.	Permitted 21.4.16
16/04718/FULL	Removal of condition 11 of planning permission dated 21 April 2015 (RN: 15/09831/FULL) for the 'Infilling of internal lightwells at second floor level to create additional office space (Class B1) together with extension at roof level to provide a new eighth floor level comprising 2 residential units with part mezzanine (Use Class C3) on the front part and additional office space (Class B1) on the rear part and minor internal alterations and new residential entrance', Namely, to remove the requirement that residential should be provided prior to the occupation of the new office floorspace at 2nd and 8th floor levels.	Permitted 22.12.16
16/05603/FULL 16/05603/LBC	Infilling of lightwells at <u>second floor</u> level to enlarge second floor level and use of enlarged second floor as office (Class B1) and / or gymnasium (Class D2) together with internal alteration of	Permitted 27.9.16

	existing stairwell to create separate access and alterations at ground floor level on the Great Titchfield Street elevation to create new entrance serving the second floor.	
16/05671/FULL (2016 permission NMA)	Variation of Condition 1 of planning permission dated 21 April 2016 (RN: 15/09831/FULL) for, 'Infilling of internal lightwells at second floor level to create additional office space (Class B1) together with extension at roof level to provide a new eighth floor level comprising 2 residential units with part mezzanine (Use Class C3) on the front part and additional office space (Class B1) on the rear part and minor internal alterations and new residential entrance'; namely, to vary the approved drawings to allow the mezzanine level to be amended and a swimming pool to be added to the roof terrace.	Permitted 20.6.17
17/02883/NMA 17/02843/LBC	Amendments to planning permission dated 27 September 2016 (RN: 16/05603) for: Infilling of lightwells at second floor level to enlarge second floor level and use of enlarged second floor as office (Class B1) and / or gymnasium (Class D2) together with internal alteration of existing stairwell to create separate access and alterations at ground floor level on the Great Titchfield Street elevation to create new entrance serving the second floor. Namely, variations to the materials used to clad the permitted extensions plus amendment to the glass balustrade.	Permitted 31.5.17

17/02998/FULL 17/02999/LBC	Erection of an infill extension of existing third floor light-wells creating additional office (Class B1) floor space and new terraces at fourth floor.	Permitted 6.6.17
17/07388/FULL 17/07389/LBC	Installation of a roof top plant lightening protection mast.	Permitted 27.7.17
17/10820/FULL	Alterations to the ground floor facades	Permitted 6.12.17
17/10821/LBC	Alterations to the front facades and internal layout works to basement and ground floors.	Permitted 6.12.17
17/08630/ADFULL	Details of noise, vibration and supplementary acoustic report pursuant to conditions 6, 7 and 9 of planning permission dated 20th June 2017 (RN:16/05671)	Validated 27.9.17 Not yet determined
17/06754/CLOPUD	Internal alterations including WC and shower, and lockers at basement, replacement of a stair leading ground floor to basement, amendments to delivery area to the rear of the loading bay and other associated internal works.	Permitted 23.1.18
18/01088/FULL 18/01089/LBC (2018 permission)	Infilling of internal light wells at fourth to seventh floor levels to create additional office space (Class B1) together with extension at roof level to provide a new eighth floor level comprising four residential units with part mezzanine (Class C3) with minor internal alterations and new residential entrance and plant in an enclosure at roof level.	Permitted 4.7.18
18/09642/FULL 18/09643/LBC	Reconfiguration of 2 x existing retail units at ground floor level on the Great Titchfield Street frontage and	Permitted 18.12.18

	conversion of 5 basement car parking spaces to retail (Class A1).	
18/09455/FULL 18/09456/LBC	Alterations at roof level to create new lift overrun.	Permitted 21.12.18
18/08645/FULL 18/08646/LBC	Alterations at ground floor level on the Great Titchfield and Winsley Street frontages, and enlargement of office entrance and use of retail unit on Great Titchfield Street as offices (Class B1).	Permitted 17.01.19
19/03375/FULL 19/03380/LBC	Alterations to Great Titchfield Street and Winsley Street, in connection with the relocation of a car parking entrance from Great Titchfield Street to Winsley Street and a retail (Class A1) unit from Winsley Street to Great Titchfield Street creation of an enlarged office entrance on Great Titchfield Street conversion of basement car parking to retail (Class A1) provision of basement cycle parking.	Permitted 15.10.19
19/04470/FULL 19/04471/LBC	Use of part of the first floor as office (Class B1) and associated internal alterations	Permitted 7.8.19
20/00569/FULL 20/00570/LBC	Infilling of internal light wells at fourth to seventh floor levels to create additional office space (Class B1), re cladding of light well walls.	Permitted 20.5.20
21/06119/FULL 21/06334/LBC	Minor material amendments to 19/03375/FULL and 19/03380/LBC above	Validated 16.9.21 <i>Awaiting determination</i>
21/06609/FULL 21/06434/LBC	Replacement windows at levels 1 to 5 with Crittal single-glazed side- and top-hung casements (types M and N); single-glazed side- and top-hung wooden casements (types W, X, Y and	Validated 27.9.21 <i>Awaiting determination</i>

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	Z); and single-glazed aluminium-framed fixed casement windows (type AZ)	
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