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26th March 2014

Dear Mr Drake

14/06963/FULL  
33 Horseferry Road London SW1P 2AA

**Demolition of Great Minster North and redevelopment to provide up to 160 residential units in three buildings; two at first to eighth floor level and one at first to seventh floor level with private balconies and terraces. Retail at ground floor level to include four retail units (Class A1) and two flexible retail/restaurant units (Class A1/A3). Associated parking at basement level and landscaped communal area above retained service road. Installation of mechanical plant at basement, ground and eighth floor levels and solar panels at roof level.**

Thank you for sending the notification of this planning application dated 29th July 2014. Thank you also for enabling the application documents to be studied in your offices. The application is full and the presentation detailed. It contains a very thorough assessment of the issues in the Design and Access Statement and in the Planning documents.

The Thorney Island Society agrees with the assessment on p. 23 of the Design and Access Statement stating that 'The [existing] building is a poor example of Post Modern design, and does little to contribute to the immediate streetscape'. However, the Society is not convinced that the proposed development is a suitable replacement.

The scheme is for three distinct blocks, two either side of the main single-storey entrance, which will be identical except in colour, and one that is set back and slightly lower, that will contain the affordable housing. The appearance, looking along Horseferry Road however, will be of four identical monolithic structures. The Society is not convinced that the repetitiveness of the main facades will be relieved sufficiently by the change of colour.

We welcome the replacement of the existing retail units while recognising a slight reduction in the gross floor area. However we are very concerned that the percentage of affordable housing is only 16% as against the recommended 25%. The area already has a large number of luxury flats, occupied and in construction. We suggest that further consideration is given to increasing the percentage of affordable units.

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We draw attention to the fact that the change of office use reduces yet further the job opportunities in central Westminster, where so many office floors are being changed to luxury residential.

The scale of the building will have an adverse effect on pedestrians in Horseferry Road and on the neighbouring buildings. Because it is on the south side of the road there will be some reduction in sunlight in the street and onto the buildings opposite. Dwellings on both sides, in Horseferry Road and in the Page Street flats, will lose daylight. In Bennett House, for instance, there are a number of dwellings that will suffer a reduction in daylight of up to 32% and for Nos 86,88,90 and 94 Horseferry Road the effect is rather worse.

Although on p.41 of the Design and Access Statement it is acknowledged that the height of buildings should not increase overmuch, the actual height increase is significant: both front and back facades (not taking into account the eighth floor, which is set back) are 5 meters taller, while the rear façade is from 1 meter to 5.5 meters closer to the Page Street buildings, hence the severe loss of light to some dwellings there.

The choice of building material does not help in the matter of light in Horseferry Road, with brickwork described as grey/green and dark blue/grey for the two main facades. Equally troubling with respect to the materials is the choice of Roman Format bricks in an area characterized by traditional red and London Stock bricks.

While approving in principle the redevelopment of this site, the Thorney Island Society would wish to see a greater respect for the neighbouring properties with regard to the scale of the building, its colour and materials.

We have a number of specific reservations, which we wish to draw to the attention of the Committee for their further consideration:

- 1 The low percentage of affordable housing
- 2 The scale of the building
- 3 The choice of materials

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

Yours Sincerely  
for and on behalf of the Thorney Island Society

*Lucy Peck*