

30<sup>th</sup> January 2020 – Richmond House

We are grateful to have been given a thorough presentation of the plans for the Northern Estate and Richmond House in particular. While we were reassured on some points, there are many other aspects of this scheme that trouble us.

### **Richmond house demolition**

We object strongly to the demolition of the interior and rear facades of Richmond House, even though the fine Whitehall façade would be preserved. Facadism might be acceptable in certain circumstances, but for the sake of a temporary building it should not be countenanced. The Whitehall façade is far from being the only part of this building worth preserving: the rest of the building is in itself valuable, both for some of the very fine interior spaces and for the exterior at the back of the building, exhibiting a scintillating contrast between the lead and glass fenestration and the brick and stone staircase towers, matching the banding on the Norman Shaw building. The Whitehall façade is brilliant, but the essence of the building is found at the rear.

The Listing Description is given in DAS 3.4, and speaks for itself:

- exemplary use of materials, of massing and detail, executed to a high standard.
- the manner in which retained elements and new construction are bound together through contextual references to the historic setting is exceptional.
- high quality interiors, fixtures and fittings conserved and reinstated in the front range of the terrace; Richmond House has a notable, monumental succession of principal internal spaces, unparalleled at the time in purpose-built post-war government offices.

#### Richmond house Significance

- Of high significance: The rear of Richmond House, where the building responds to the existing character of Shaw's New Scotland Yard buildings (Grade I and II\* listed respectively) in its materials, massing and detail. In particular, the rear elevations step down deferentially and the monumental faceted, red brick and stone banded stair towers were designed to be in direct dialogue with the brick and stone banding on Shaw's buildings.

The range of Legacy opportunities (described in DAS 9 Legacy) for the temporary chamber is a negative rather than a positive, suggesting that there is no really suitable legacy use. There might in future be good reasons for demolishing this building, but to replace it at this stage, with a building that will only be occupied for six years and for which a good legacy use has yet to be identified, is wrong.

### **Richmond House replacement**

It is proposed that this remarkable 1980's Grade II\* listed building is replaced by one that is deeply pedestrian in style. If Richmond House is to be replaced we suggest that the design of the replacement building is re-examined.

## **DAS 4 Evolving the Design**

We note that various options were considered for the location of the temporary Commons chamber. The main constraint is described in 4.1.3.3:

The brief for the temporary Chamber required the existing layout and footprint of the principal floor of the House of Commons Chamber and Division Lobbies to be replicated while improving accessibility.

The only reason why many of the alternative site locations are unviable is because of this whimsical decision by MPs to retain every feature of their antiquated voting system. The constraint of 8 minutes from the Division bell is similarly artificial (2.5.3.1). A modern voting system would do away with this. Would this really be the end of western democracy? Even if they had to face up to the twentieth century and adopt modern voting systems, this need only be on a temporary and experimental basis; MPs can always revert to the fifteenth century when they return to the restored PoW.

Are we to lose an exceptional bit of architectural heritage for the sake of parliamentary voting rituals? We would suggest that the original Brief is re-examined.

## **Retaining Richmond House**

We appreciate that the Richmond House office spaces have their limitations, but we don't understand the reasoning behind a statement such as: 'The composite design would have a detrimental impact upon the integrity of Whitfield Associates' design.' (4.1.4 Retaining the Southern Wing). That would surely be better than demolishing everything but the western façade?

We understand, in 4.3.3.4, the argument that 'the existing coffered ceilings have the following implications on future space planning:

- Space planning dictated by coffered grid. Clear height to underside of coffers 2.45m.
- Limited raised access floors for services distribution.'

But 2.4 m ceiling heights for cellular offices is unproblematic. Committee rooms clearly need greater headroom but there must be space that could be found elsewhere for those.

## **Other comments**

### **LBS- ES Vol 1 – Environmental Statement**

**4.1 Alternatives** – The summary of the discussion of the alternative sites do not take into consideration the environmental impact of each scheme as required under Clause 18 (3) (d) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Paragraph 4.1.20 says that the redevelopment of Richmond House enables the 'rationalisation and modernisation of onsite plant and provision of a new energy centre.' This would of course apply to the redevelopment of other NEP buildings as well. Para 4.1.22 says that the choice was 'strongly influenced by environmental considerations', but there is no reasoning to back this up. There is a reference to Masterplan Vol 1 NEP 0.1 containing

material on environmental comparisons but the discussion of alternative sites is entirely about practical matters.

In Paragraph 1.6.7 (Materials) there is the following:

Material use has been optimised by considering circular economy principles and carrying out a life cycle assessment of materials' environmental impacts to identify opportunities for reducing the impact. Existing facades and interior finishes will be retained where practical. A Circular Economy Statement has been produced, in line with draft Policy SI7 and is included in the Estate-wide Sustainability Statement (NEPO.2.2). By significantly redeveloping Richmond House and reducing the predicted embodied carbon of the proposed design by 30%, the invested embodied carbon is repaid within an estimated 40 years.

We find this a curious statement: the same argument could be made for a decision to demolish the interiors of any other of the Northern Estate buildings, such as NSN, leaving only the façade. Richmond House, erected in the 1980s with, we assume, some energy-saving attributes (complying with Building Regs at that time), is surely the building that would repay least in energy running costs if rebuilt.

Most pertinently, it should be noted that a time period of 40 years for repaying the invested embodied carbon is ludicrously unambitious. It is longer than the period during which Richmond House has even existed.