



*Friends of St. James's Park and The Green Park*  
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For the attention of Matthew Mason Esq.,

29th November 2013

Dear Mr Mason

**13/09737/FULL**

**Development Site At Ergon House Horseferry Road and 9 Millbank  
London**

**Use from offices to residential flats, including internal alterations, refurbishment, restoration works. Partial demolition of rear wing of 9 Millbank and extension to provide residential accommodation. Demolition of Ergon House and construction of eight storey residential building incorporating a ground floor retail unit.**

**Refurbishment of the gatehouse on Dean Bradley Street and conversion to residential use. Landscaping within two internal courtyards. Vehicular access for private vehicles and servicing via existing ramp from Dean Bradley Street.**

**Associated on-site car parking and cycle parking at basement levels.**

Thank you for advising the Society of this Application and referring us to the web site to view the enormous number of documents. Having in the past found the access somewhat difficult we made arrangements to view the whole application at City Hall. We have given careful consideration to the Application and its implications including the overall planning context.

#### **Executive Summary**

The Thorney Island Society has reviewed the overall context of the Application; this being considered highly relevant as the Application relates to such an important location. It is a matter of urban design, planning policy, Conservation Area as well as two major buildings. The Society concludes that the application is unacceptable and urges the rejection of the Application.

The main issues are summarised at the end of our letter.

#### **General**

The proposition is complex not least by the combining of the distinctly separate properties - 9 Millbank, Ergon House and the Gatehouse. Each is distinctive as singular entities. The only common denominators bringing them together in the Application are the wish for 'Change of Use' from office to residential; and the assumption that the three buildings are redeveloped as one enterprise.

We question the proposal for the change of use. This is on the grounds that a considerable number of Office Buildings have been granted permission, which has invariably resulted in demolition. We are concerned by the loss of office employment space and how this apparent policy is justified as far as future employment needs and opportunities. The location falls within Westminster's and London's Central Business District, within the London Plan.

Similar recent examples of change of use to residential have a bias of being developed for the upper market level, and according to the Press, for 'non doms'. The likelihood is that they are regarded as investment portfolios, with a tendency of being 'part time' occupied. In such cases there is virtually no benefit to the housing provision, and little to Westminster Council. At face value, this is a serious commentary which raises questions as to the likely future should this Application be granted.

## **Background**

The location of the three buildings in Westminster is significant, as the street names imply, and to which each of the three buildings is connected. Horseferry Road describing the route to Lambeth and the Archbishop's Palace; and in turn the way into Westminster.

It was recognition of this significance, that the two buildings marking this 'gate way' of which 9 Millbank is one, bear a strong resemblance. Appropriately their design and style set them apart from buildings of lesser stature along Horseferry Road. Any action that reduces their significant impact should be regarded as contrary to the overall quality of the City's architectural urban environment.

The Application proposals are developed on the fact that there are three distinct buildings, each with their own distinct characteristics. However the Application singularly fails to respect the distinction between the replacement of Ergon House and 9 Millbank. It chooses to maximise development potential at the cost of the most important historic urban design statement that Ergon House is in mass and height lesser than 9 Millbank. On this key aspect we consider the Application proposals for the Ergon House site are questionable. This distinction in height is seen as a paramount principle.

## **Consideration of the three buildings**

**9 Millbank** The major changes to 9 Millbank are in the main the proposals for the interior, and as such do not affect the substance of the exterior elevational appearance. The alterations to the rear part of the building may be considered as acceptable in principle. As to the modifications to the interior, comments will be made by English Heritage being the overseer of this listed building. The elevational treatment to the proposed central courtyard area is a matter referred to later.

**Ergon House** The building has substantial architectural qualities providing it with scale and 'presence' of a very high standard. Even though the building is not listed it has substantial qualities worthy of retention: and the like of which are unlikely to be produced again. It has a unique quality therefore.

We are extremely concerned by the proposed entire demolition of Ergon House. It's contribution to the entrance route into Westminster must not be ignored nor abandoned. The fact that it is unlisted may not be taken as an indicator that the building may be demolished without appropriate consideration being taken into account, nor that it is not of inherent architectural quality.

Considering the building's appearance as a whole it must be recognised that it's strengths have withstood the 'modernising' affects carried out in the 1980's. The fact that the building is predominated by the use of rugged Portland stone achieves an homogeneity; which was unfortunately reduced by the introduction of the brown vertical panels incorporating the fenestration. Notwithstanding this, the building's 'corner' on Dean Bradley Street and Horseferry Road remains the most striking architectural feature on Horseferry Road. But it is not only the literal corner that is significant, but includes the returns along both facades. The significance to the Conservation Area can not be over stated and emphasises the approach to St John's Smith Square. Similarly though of less dramatic architecture, the elevation abutting 9 Millbank is part of the same architectural quality and significance.

**The Gatehouse** The building is a distinct separate entity and must remain so.

## **The Proposals for Ergon House replacement**

We find the architectural proposals for the replacement of Ergon House unacceptable on a number of grounds. Firstly any proposed architectural replacement must in essence be at least as high a standard of design in all terms as that which it would replace - urban design, massing, and detailed design of the elevations; as well as practical considerations.

We do not agree with the concept of wholesale demolition of the building as being necessary for the change of use to residential. A case may be made for the retention of the external fabric of Ergon House while amending the interior to suit the purpose of residential use. The simplistic course of action proposed in the Application is to destroy and demolish no doubt it being considered simpler and possibly more profitable to those involved. In some instances this may be true but in many instances it is not.

Part of the balance on acceptability in this case is in the assessment of the quality of the proposed replacement, versus the existing. However we consider the proposals in this instance do not meet this criterion. We find the insensitivity of the elevations in detail to be surprising from the architectural practice which had been sensitive in the handling of St Martin' in the Fields; although much less so in it's treatment of the elevation in Piccadilly. Both are illustrated in the submission.

For example, instead of the existing strong classically inspired corner treatment including the emphasis of the entry to the building, the replacement proposal is gross. The elevation at the

corner is surmounted above a crude cornice, by a blank or to be ornamented two storey stone slab - (see the Application as "proposed at ARM on 8th Aug 2013"). The contrast between the two illustrations in the Access and Design Statement is salutary. It is an indication of the indifference shown to the qualities of the existing building's facades: and to the important location within the Smith Square Conservation Area. Treating the ground floor with a dark material distinguishes it from the upper floors - but since apart from a retail unit it is fronting residential. This adds an inappropriate emphasis to the ground storey.

We consider that the elevations on to Horseferry Road and Dean Bradley Street as a whole lack any of the finesse of the original building .

#### **Summary of the key issues**

- 1 Loss of office space, given that so much is being changed to 'residential'.
- 2 How does this fit with the London Plan and Westminster's Planning policies, given the location within the Central Business District
- 3 Where is the case stating that there is no viability for the existing office use ?  
Are the Proposals solely to maximise short term commercial interests. ?
- 4 The Proposals do not recognise the overall urban design significance of 9 Millbank and its relationship to Ergon House
- 5 The Proposals do not recognise the architectural stature and qualities of Ergon House and its uniqueness in the area.
- 6 The Proposals lack empathy for the local context and the Conservation Area.
- 7 We find the lack of recognition for the local context unacceptable. .
- 8 The contrast between existing Ergon House and the proposed replacement shows the proposals very weak in architectural design elements
- 9 We had expected more consideration and response to the local situation from an architects' practice which had shown sensitivity regarding its work on St Martin in the Fields: however lacking in Piccadilly.
- 10 The Society urges the Planning Committee to Object to this Application; that the Applicant be urged to recognise the concerns registered.

The Thorney Island Society has considered the wide ranging issues that are raised by this very large and highly detailed application. The Documentation has failed to convince us that the Proposals are appropriate to the sites involved. We urge that full recognition of the considerations that we have outlined above be taken into account by the Planning Committee and that they concur with us that the Application as it stands is unacceptable.

Yours Sincerely  
For and on behalf of the Thorny Island Society

pp *Tom Ball*  
**June A Stubbs**  
Chairman

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