



## Northern Estate Programme

### Norman Shaw North Standalone Planning Statement

March 2020

00NSN-2131-BDP-XX-XX-T-XX-RG-10342

Status: S2

Revision: C01



HOUSE OF COMMONS  
NORTHERN ESTATE PROGRAMME

<b>Version</b>	<b>Date</b>	<b>Name</b>	<b>Reviewed By</b>	<b>Description of Changes</b>	<b>Sign-off</b>
C01	29/03/2020	A May	T Rudd	For Planning	GK

## Contents

Contents.....	2
1 Introduction .....	3
2 Site and Surrounding Area .....	9
3 Pre-Application Consultation .....	17
4 The Proposed Development .....	19
5 Planning Policy Review.....	31
6 Summary and Conclusions .....	52

## **1 Introduction**

1.1.1 This Planning Statement has been prepared to support an application for full planning permission and listed building consent for a package of internal and external works to the Norman Shaw North (NSN) building, a Grade 1 listed building located on the Parliamentary Northern Estate. The report has been prepared by BDP on behalf of the Corporate Officer of the House of Commons.

### **1.2 Description of the Proposals**

1.2.1 The description of development (the Proposed Development) relating to the Norman Shaw North proposals application is set out below:

*“Full planning consent for the refurbishment of Norman Shaw North including the installation of a glazed roof covering to the internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); installation of chillers at ground level adjacent to the northern elevation; basement piling; alterations to the courtyard eaves to create a roof access gallery; alteration of the northern elevation; alteration of north western corner stepped plinth; alteration to Laundry Road landscape and levels to provide accessibility improvements; and crane gantry screw piling located in Commissioners’ Yard.*

*Listed Building Consent for the internal and external refurbishment, including installation of new building services and rooftop repairs and reconfiguration including rooftop louvres and reconstruction of chimneys; courtyard roof fixings; secondary glazing; and interiors; alterations to existing openings and basement vaults; and associated works including temporary construction works.”*

### **1.3 Need for the development**

1.3.1 The need for the NSN proposals relates to the urgent need to undertake critical repair and refurbishment works both internally and externally, to preserve the significance of the Grade I listed building and ensure its long-term future for Parliamentary use is secured. The last significant major internal refurbishment works to the building date from the 1970s, including MEP services. Whilst adaptations and additions have been made over the years the installations are dated, they do not meet modern workplace standards and are beyond their economic life expectancy. In addition the externals of the building, specifically the elevations and roof, are considered to be of a poor maintenance standard with recent surveys identifying a number of critical defects, including a lack of slates in the roof, dry and wet rot, and cracking leading to falling masonry. The roof coverings including flashings and leadwork, chimney stacks, doors and windows are also required to be upgraded to bring the building envelope into good and weather tight condition.

1.3.2 Building services will also be replaced throughout the building to bring them in line with modern standards, and improve the internal conditions and energy performance of the building. Service upgrades include the replacement of plant throughout the building; new

risers and ceiling rafts to distribute services; and new chiller units in an enclosure to the north of the building.

- 1.3.3 In addition to the critical need for refurbishment and repair works, the proposals will deliver improved Parliamentary functions that meet modern standards and provide for the operational needs of the Parliamentary Estate. The principal intervention into the building – a new glass roof will create a courtyard atrium space, providing essential restaurant and communal working space for NSN and the wider estate. Other interventions into the building create space for other required upgraded functions within the Parliamentary Estate, including: office accommodation; meeting and conference rooms; operational staff hub; and maintenance workshop space.
- 1.3.4 The proposals also seek to substantially improve accessibility into and within the building, introducing new step-free routes, eliminating as far as possible steps and kerbs and introducing new step-free entrances. The ambition is to provide a fully accessible building and barrier-free approach and entry, via an improved external landscape.
- 1.3.5 This planning application (known as the NSN Standalone application), is submitted following the submission of a number of recent applications for NSN, comprising:

NSN NEP2 Planning (19/08243/FULL) and LBC (19/08251/LBC) – submitted in October 2019 as part of the NEP Masterplan suite of applications for the comprehensive refurbishment and redevelopment of the Parliamentary Northern Estate to allow the decant of the House of Commons, into a temporary chamber and accommodation on the Northern Estate. Pending determination.

*19/08243/FULL*

*“Installation of glazed roof covering the Norman Shaw North internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); alterations to existing openings and basement vaults; piled foundations in Commissioners Yard to support a temporary construction plant gantry, and associated works including temporary construction works.”*

*19/08251/LBC*

*“Installation of glazed roof covering the Norman Shaw North internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); internal and external refurbishment, including installation of new building services and rooftop louvres; courtyard roof fixings; secondary glazing; and interiors; alterations to existing openings and basement vaults; piled foundations in Commissioners Yard to support a temporary construction plant gantry, and associated works including temporary construction works.”*

NSN Envelope Planning (20/06649/FULL) and LBC (20/06650/LBC) – consented February 2021 for a package of critical repair works to the external of NSN.

*20/06649/FULL*

*“Alterations to the courtyard eaves to create a roof access gallery; installation of new stone window recesses on the northern elevation; alteration of north western*

*corner stepped plinth; and temporary crane gantry screw piling located in Commissioners Yard”*

*20/06650/LBC*

*“Refurbishment of external facades; roof repairs and reconfiguration, including reconstruction of chimneys; removal of portacabins and demarcation of the courtyard central oculus; temporary removal of coping stones in the Embankment forecourt; temporary scaffolding fixings; alterations to the courtyard eaves to create a roof access gallery; installation of new stone window recesses on the northern elevation; alteration of north western corner stepped plinth; and temporary crane gantry screw piling located in Commissioners Yard.”*

- 1.3.6 The majority of the works proposed in the March 2021 Standalone application replicate the envelope works that were included in the NSN envelope applications, and the internal works included in the October 2019 NEP2 applications, with the exception of: addition of 72 mini piles at the basement slab; external chillers with associated enclosure; additional roof louvre; development of the north elevation design; and piling to the lift pits, southern vaults and north east pavilion foundations.
- 1.3.7 In May 2020 the Sponsor Body announced a Strategic Review of the Restoration and Renewal Programme, including how the requirements for a temporary House of Commons decant may have developed in response to Covid-19. As a result, determination of the October 2019 masterplan suite of applications is on hold, pending the outcome of the Strategic Review, and subsequent work requested by the House of Commons to ensure that plans address both the temporary requirements arising from the R&R works in the Palace of Westminster and the long term needs of the Parliamentary estate, being considered through an estate-wide masterplan.
- 1.3.8 In order to progress urgent repair works to NSN, a full planning application (20/06649/FULL) and LBC application (20/06650/LBC) was submitted for works to the external envelope of the building on the 16th of October 2020, and was granted consent on the 3<sup>rd</sup> of February 2021. This application is known as the ‘Envelope application’. The envelope application was designed to work with the October 2019 NEP2 application as part of a wider masterplan, or a standalone proposal for NSN.
- 1.3.9 The NSN Envelope application decoupled the critical external works from the October 2019 masterplan suite of applications to allow urgent works to the external of NSN to begin without delay, and ensure no further deterioration of the building occurs.
- 1.3.10 Subsequent to the preparation of the NSN envelope works application, in the context of anticipated delays to the outcome of the R&R Strategic Review, the House of Commons Commission gave a direction to proceed independently with the full refurbishment of Norman Shaw North, while also continuing to work with Sponsor Body through the Strategic Review to achieve mutually consistent outcomes.
- 1.3.11 The NSN standalone application comprises a comprehensive package of internal refurbishment works and critical repair works to the external envelope, and in effect will supersede the NSN Envelope consent (20/06649/FULL and 20/06650/LBC). The application is

independent of the previous NEP Masterplan and NSN Envelope applications, and is therefore referred to as the NSN Standalone application.

1.3.12 The NSN standalone proposals will preserve the significance of the listed building and enhance the character and appearance of the conservation area, and ensure that the building and its special interest is preserved for generations to come. Any harm resulting from the proposals has been minimised to the smallest degree possible, and is outweighed by the significant public benefits delivered through the proposals, including:

- New interior design which is sympathetic in approach to the historic character of the building, to be determined in further detail in later design stages;
- Repair and redecoration/refurbishment of special features internally, for example, the war memorial lamp, chimneypieces, doors, joinery and staircases, details to be determined in further detail in later design stages;
- Removal of 1970s suspended ceilings to reveal original ceiling heights and cornices;
- Removal of unsightly modern fire-doors and screens and replacement with better designed modern alternatives;
- Removal of later alterations to the floor plan;
- Reinstatement of the oculus and railings in the courtyard, which restores natural light to the basement areas;
- A well-designed terrazzo floor finish within the courtyard;
- The comprehensive cleaning, repair and refurbishment of the exterior of the building, including the principal elevations and roofs;
- The improvement of safe access at roof level;
- The rationalisation and improvements to the lower-ground-floor level of the north elevation;
- The removal of the modern portacabins, bins and cycle storage facilities from the courtyard, which detract from significance;
- The removal of the modern portacabins from the northern elevation;
- The removal of later louvres and rooflights from the roof and replacement with well-designed louvres on the inner-facing slopes;
- Rationalisation of mechanical, electrical and plumbing services, removing unsightly service runs and plant areas and replacing these with better designed modern alternatives. The reconstruction of the five chimneys to accommodate necessary modern building services contributing to Parliament's 2050 zero carbon target; and
- Improvements to the setting of the building, by removing the granite 'skirt' added in the 1980s, restoring the original ground level, and implementing new paving and a new well defined entrance.

1.3.13 The NSN standalone proposals have been developed to be delivered as an independent package of internal and external works to the building, or as a constituent part of a wider masterplan for the Northern Estate. As such the standalone proposals are compatible with and do not preclude the determination of the October 2019 NEP2 applications. The NSN

standalone application is intended to supersede the NSN Envelope consent (20/06649/FULL and 20/06650/LBC).

## 1.4 Supporting Documents

1.4.1 The Norman Shaw North standalone submission is accompanied by the following supporting documents:

- Completed Application Forms and Certificates
- Completed CIL Questions
- Covering Letter
- Existing and Proposed Drawings
- Design and Access Statement
- Heritage Impact Assessment
- Archaeology Statement and Written Scheme of Investigation (WSI)
- Ecology Statement, including Bat Survey
- Arboricultural Statement
- Transport Statement
- Noise Impact Assessment
- Outline Site Environmental Management Plan, including signed Appendix A Checklist
- Ground Conditions Report

1.4.2 These documents have been produced by an interdisciplinary team, led by BDP (Planning Consultant, Architect and Ecologist) and including the Corporate Officer of the House of Commons (the Applicant), Donald Insall Associates (Heritage), AECOM (Engineering and Acoustics); MOLA (Archaeology); Steer (Transport Consultant); and Wates (Contractor).

## 1.5 Structure of the Statement

1.5.1 This Planning Statement provides an overview of the Norman Shaw North site and surrounding area, a summary of the Proposed Development, and an assessment of the proposals against the relevant national, regional and local policy. The structure of the statement is as follows:

- **Section 2: Site and Surrounding Area** provides a description of the Norman Shaw North standalone site and surrounding area, establishing the key planning considerations against which the Proposed Development will be assessed.
- **Section 3: Pre-Application Consultation** describes the pre-application consultation that has been undertaken in relation to the Norman Shaw North site with WCC and Historic England.



- **Section 4: The Proposed Development** describes the key aspects of the proposals.
- **Section 5: Planning Policy Review** sets out the relevant national, regional and local planning policies relevant to the Proposed Development and provides an assessment of the Proposed Development against planning policy and guidance
- **Section 6: Summary and Conclusions** sets out the overall conclusions to confirm the acceptability of the Proposed Development in planning terms.

## **2 Site and Surrounding Area**

2.1.1 This section describes the existing site, its surroundings and relevant context.

### **2.2 Strategic Location of the Northern Estate**

2.2.1 The Norman Shaw North site is situated on the Parliamentary Northern Estate, which is located in the City of Westminster, London, within the jurisdiction of Westminster City Council (WCC). The Estate is located directly to the north of the Palace of Westminster, and is bound by Victoria Embankment to the east, Parliament Street and Whitehall to the west, Bridge Street to the south and the gated Richmond Terrace to the north.

### **2.3 Policy Designations**

2.3.1 The Northern Estate sits within the Core Central Activities Zone (CAZ). The Estate lies within the Whitehall Conservation Area and is in close proximity to the Westminster Abbey and Parliament Square Conservation Area and the Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site. The Northern Estate is also situated within the Westminster Lundenwic and Thorney Island Area of Special Archaeological Priority as identified in the WCC Local Plan proposals map. The site is located within Flood Zone 3 and the Rapid Inundation Zone, and is designated within the Westminster Air Quality Management Area and Thames Policy Area.

### **2.4 Uses and Layout of Northern Estate and Norman Shaw North**

2.4.1 The strategic location of the area as a site of national and international importance is reflected in the range of land uses surrounding the site and wider Northern Estate, including the Houses of Parliament, Westminster Abbey, the Supreme Court, Civil Service operations at Whitehall and the Metropolitan Police Service (MPS) headquarters at New Scotland Yard. The Northern Estate has been built gradually over a period of three hundred years for a variety of uses, including residences and as the Metropolitan Police headquarters. It now provides Parliamentary office accommodation for Members of Parliament (MPs). Within the Northern Estate, these buildings are linked by a series of external spaces, mainly comprising Canon Row, Commissioners' Yard, Derby Gate and Laundry Road.

2.4.2 The seven-storey Norman Shaw North building is configured in a square block with an internal courtyard. A bridge over Commissioners' Yard provides an internal connection between Norman Shaw North and Norman Shaw South, to the south of the site. The existing building contains Parliamentary office accommodation, a first aid room, a faith room and parcel office.

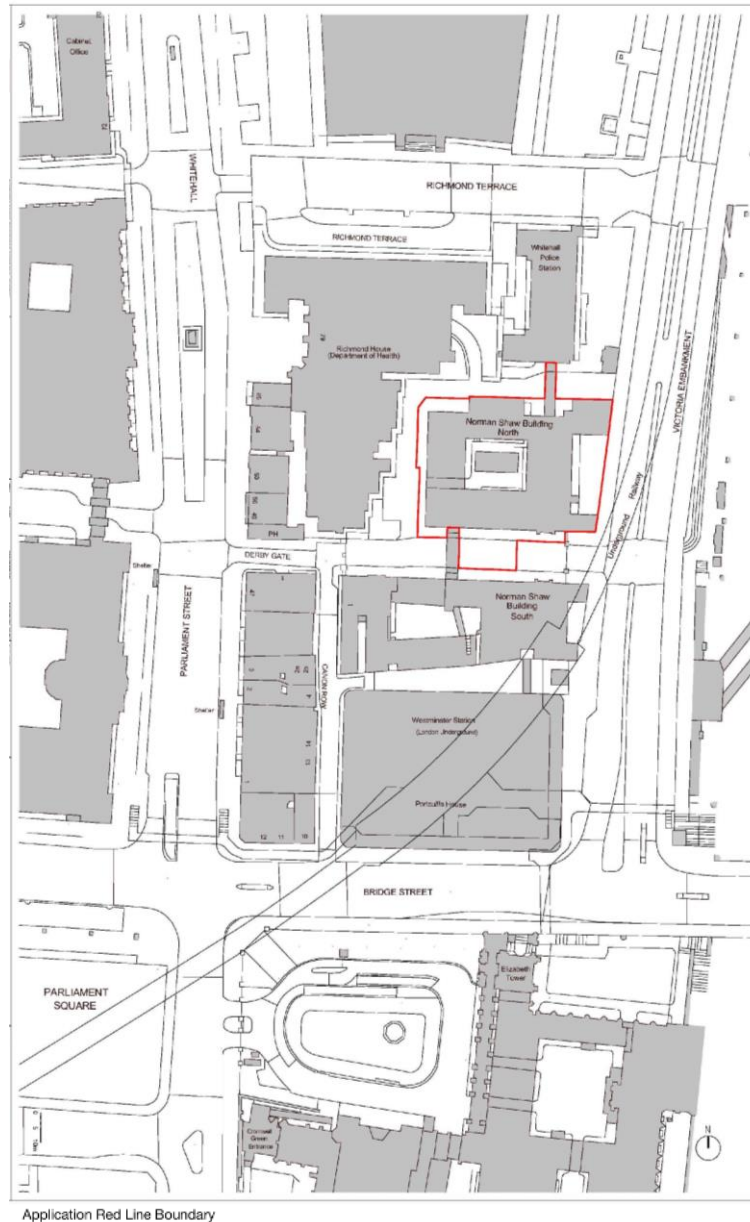
2.4.3 The activities carried out in Norman Shaw North are for the purpose of Parliamentary business and linked to the Palace of Westminster, both in the nature of the work and physically. The effective functioning of Parliament requires the free movement of MPs and their staff around both the Palace of Westminster and the Northern Estate. The existing use of Norman Shaw North is highly specialised and comprises a mix of functions, including a level of public access. As such, Norman Shaw North is not considered to fit within the discrete use classes defined within the Use Classes Order (1987), and the existing lawful use of the building is considered to be *Sui Generis*. This accords with relevant case law including *London Residuary Body v Secretary of State for the Environment* (1989) 3 PLR 105 and

London Residuary Body v Lambeth London Borough Council: HL (1990) where it was found that County Hall complex in London did not fall within B1 office use class.

## 2.5 Application Site

2.5.1 Norman Shaw North is located to the north east of the Northern Estate, situated between Norman Shaw South and Derby Gate to the south and New Scotland Yard and Curtis Green to the north. The eastern façade fronts onto Victoria Embankment, whilst the western elevation faces Laundry Road and the rear of Richmond House.

2.5.2 The extent of the Norman Shaw North standalone site is shown in Figure 2.1 below.



**Figure 2.1: Site location plan**

## 2.6 Heritage Significance

### Heritage Context

- 2.6.1 Norman Shaw North is located in one of the most sensitive heritage locations in the country. It is located within the Whitehall Conservation Area, adjacent to the Westminster Abbey and Parliament Square Conservation Area, and is also within the setting of the Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site, which is located to the south, and numerous listed buildings and monuments, including the Grade I listed Palace of Westminster. Norman Shaw North also occupies an important position within the townscape of Westminster, forming the backdrop to the Grade I listed Cenotaph located along the ceremonial route between Trafalgar Square and Parliament Square. A detailed summary of the heritage significance of the site is set out in the supporting Heritage Impact Assessment.
- 2.6.2 The Grade I listed Norman Shaw North was originally constructed between 1886 and 1890, designed by the architect Richard Norman Shaw as the first purpose-built headquarters for the Metropolitan Police. The building is considered to form the outstanding work of architecture and set piece on the Northern Estate, and is the only Grade I listed building on the wider Parliamentary Estate aside from the Palace of Westminster. The building is significant for its intrinsic qualities as a work of Norman Shaw and for its prominence on the riverscape. The exterior, the internal courtyard elevations, and the interiors are all important.
- 2.6.3 Further details of the significance of the relevant designated heritage assets are included in the supporting Heritage Impact Assessment.

### Current Detractions from Significance

- 2.6.4 There are a number of existing features within and surrounding Norman Shaw North that detract from the significance of the Grade I listed building. The standalone works therefore provide an opportunity to remove existing low quality features and replace them with more sensitive interventions that enhance the heritage significance of Norman Shaw North and the wider Estate.
- 2.6.5 A full list of features considered to detract from significance of Norman Shaw North are set out in the accompanying Heritage Impact Assessment. Those relevant to the standalone application include:
- The public realm in and around Norman Shaw North is generally of poor quality and detracts from its setting and that of other designated assets and, consequently, makes a negative contribution to the character and appearance of the Whitehall Conservation Area;
  - Temporary portacabins and unsightly waste and bicycle storage in the internal courtyard obscure the elevations and degrades the space;
  - Modern gates and temporary buildings around the site;
  - The alterations made to the north elevation where single-storey buildings have been removed leaving an unresolved elevation at ground floor level, which was never intended to be exposed;

- Poorly designed modern plant, ductwork and other services which obscure the original architecture, inside and to the elevations of the building;
- The concrete roof covering to the single-storey courtyard projection;
- Wire mesh installed to address falling masonry and brick work, detracts from the visual quality of the facades, with brick face fixings impacting fabric.
- Poor roof detailing, with failing slate tiles and lead flashings resulting in internal water damage.
- The suspended ceilings throughout most of the building which conceal ceilings and alter the volume of the associated rooms and corridors.
- The 1970s glazed doors and panels throughout the corridors and stairwells.
- Modern wall-mounted trunking in the rooms housing services.
- Modern carpets which likely cover original floor coverings.
- Modern net curtains serving the windows facing the courtyard.

### Archaeology

2.6.6 The Norman Shaw North site is located within the Lundenwic and Thorney Island Area of Special Archaeological Priority, revised as the Westminster and Whitehall Archaeological Priority Area in Westminster's forthcoming new City Plan. The supporting Archaeological Statement prepared by archaeological consultants MOLA, indicates that:

- The whole site has high potential for palaeoenvironmental remains within surviving alluvial deposits. The significance of any such remains would be low to medium and would be derived from their evidential value.
- The western two-thirds of the site, including the location of the crane gantry, has high potential for archaeological remains dating from the later medieval period as it was reclaimed and built up to create the riverfront by the 14th or 15<sup>th</sup> century. Remains of this period would be of medium significance, or possibly high if well preserved and extensive, with historical and evidential value. Residual remains, such as pottery, within and beneath what is likely to be a substantial thickness of medieval consolidation material, would be of low significance.
- The western two-thirds of the site has a high potential for post-medieval remains. Remains of this period could be of low or medium significance, depending on their nature and state of preservation, with their evidential and historical value.
- The area of the site within the Victoria Embankment (eastern third of the site) has a low potential for all periods apart from late 19th century deposits of low significance.

## **2.7 Existing Character and Townscape**

2.7.1 Norman Shaw North forms part of the iconic view of the Parliamentary Estate from the South Bank across the River Thames. The Norman Shaw buildings are experienced as a panoramic river frontage alongside the Palace of Westminster and Ministry of Defence, recognised by a number of designated views in the London View Management Framework, including River Prospect 17A: Golden Jubilee/Hungerford Footbridges, River Prospect 18B:

Westminster Bridge, and River Prospect 21A: Jubilee Gardens and Thames Side in front of County Hall. The scale of the Northern Estate urban block is such that 1 Canon Row and the internally-facing parts of Norman Shaw North are not visible from the surrounding public urban realm.

- 2.7.2 Norman Shaw North can be distinguished externally by its fortress-like design, which exudes permanence while mediating between classical and gothic traditions through use of materials and application of detail. The distinctive red brick and Portland stone banding on the upper storeys sets both Norman Shaw North and Norman Shaw South apart from their neighbouring buildings. Further details include Baroque rusticated surrounds and columns at the entrance, segmental pediments over windows, architraved mullioned-transomed small pane casements with cornices on the first floor and segmental arched with keystones on the second. Large elaborated gables form attic storeys on the north and south elevations. Blind single storey wings project from the ground floor and connect via tall cast iron railings which screens the forecourt.
- 2.7.3 Norman Shaw North was internally adapted in 1965 to accommodate new occupants including the Diplomatic Service, Ministry of Defence and Board of Trade; and again in the early 1970s upon incorporation into the Parliamentary Estate to accommodate passholders offices.
- 2.7.4 A two storey bridge with matching banding and dressing forms a connection between Norman Shaw North and Norman Shaw South, whilst Commissioners' Yard Gate provides a decorative entrance from Victoria Embankment.

## **2.8 Existing Connections**

- 2.8.1 The Northern Estate is surrounded by public highway. It is bounded to the east by Victoria Embankment (the A3211), to the south by Bridge Street (the A302) and to the west by Parliament Street (the A3212).
- 2.8.2 Existing vehicular service access to Norman Shaw North is provided at Curtis Green from Victoria Embankment, and Derby Gate from Parliament Street. A service yard serving the wider Northern Estate including Norman Shaw North and Norman Shaw South is located in the courtyard of the latter. The flow of service vehicles and deliveries to the Northern Estate is currently managed through an Off-site Consolidation Centre, where deliveries are decanted into tracked vehicles in order to minimise vehicle movements and manage entry and egress.
- 2.8.3 The safest way to manage construction access and business as usual vehicles on the estate is to establish a one way system, with access from the Victoria Embankment via Curtis Green Gate and Commissioners' Yard Gate, and egress via Derby Gate on to Parliament Street. The programme of access improvements is underway with construction complete at Curtis Green Gate (19/05447/FULL) and Commissioner's Yard Gate (18/05074/FULL and 18/05075/LBC). An application for alterations to Derby Gate (20/06577/FULL and LBC 20/06578/LBC) is currently pending a decision. The Adaptations to Derby Gate application was submitted concurrently with the Norman Shaw North envelope works application (20/06649/FULL and LBC 20/06650/LBC), to implement one way logistics access through the estate, and facilitate the construction of the envelope and, standalone proposals. The

controlled vehicle access point at Commissioner’s Yard Gate is restricted to 10 metre vehicles due to site constraints, including loading on the London Underground line below the Embankment, with larger 12 metre vehicles intended to enter the site via Curtis Green Gate and exit via Derby Gate. A full discussion of the improvements to access across the estate and their interface with the NSN Standalone application is provided in Section 4 Proposed Development, and Section 5 Planning Policy Review.

2.8.4 The Norman Shaw North site is accessed through the wider Northern Estate, which can be accessed by pass-holders on foot from a number of controlled entrances on Victoria Embankment, Parliament Street, Richmond Terrace, Portcullis House and the Portcullis House entrance from Westminster Underground Station. Visitor entrances to the Estate are provided at Portcullis House and 1 Parliament Street.

## 2.9 Planning History

2.9.1 A summary of the planning history for the site and surrounding area is provided in Table 2.1 below. The most relevant planning history for the site is for Norman Shaw North and the Northern Estate Programme full and listed building consent main works applications for Norman Shaw North (NEP2).

2.9.2 The enclosed planning application forms a standalone application for both internal and external works, submitted following the submission of the October 2019 NEP2 NSN planning (19/08243/FULL) and LBC (19/08251/LBC) applications, and approval of the NSN envelope works full planning (20/06649/FULL) and LBC (20/06650/LBC) applications. The majority of the works proposed in the new application replicate the envelope works that were included in the NSN envelope applications, and the internal works included in the October 2019 NEP2 applications.

**Table 2.1: Planning History**

Application Ref	Decision Date	Status	Description
Norman Shaw North Envelope Works 20/06649/FULL and LBC 20/06650/LBC	03/02/2021	Permitted	Alterations to the courtyard eaves to create a roof access gallery; installation of new stone window recesses on the northern elevation; alteration of north western corner stepped plinth; and temporary crane gantry screw piling located in Commissioners Yard. Refurbishment of external facades; roof repairs and reconfiguration, including reconstruction of chimneys; removal of portacabins and demarcation of the courtyard central oculus; temporary removal of coping stones in the Embankment forecourt; temporary scaffolding fixings; alterations to the courtyard eaves to create a roof access gallery; installation of new stone window recesses on the northern

**Table 2.1: Planning History**

Application Ref	Decision Date	Status	Description
			elevation; alteration of north western corner stepped plinth; and temporary crane gantry screw piling located in Commissioners Yard.
Norman Shaw North (NEP2) 19/08243/FULL and LBC 19/08251/LBC	On hold	Awaiting decision, pending the outcome of the Strategic Review of the Northern Estate Programme	Installation of glazed roof covering the Norman Shaw North internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); alterations to existing openings and basement vaults; piled foundations in Commissioners Yard to support a temporary construction plant gantry, and associated works including temporary construction works. (Linked to 19/08251/LBC)
Parliamentary Northern Estate Programme applications (NEP1, 3 – 7) 19/08220/FULL 19/08221/LBC 19/08267/FULL 19/08271/LBC 19/08287/FULL 19/08290/LBC 19/08256/FULL 19/08259/LBC 19/08254/FULL 19/08255/LBC 19/08278/FULL 19/08279/LBC	On hold	Pending decision	Temporary installation of five substations on Victoria Embankment, and associated cable connections, in association with construction works for the Parliamentary Northern Estate Programme.
Derby Gate 19/09166/FULL 19/09167/LBC	18/11/2019	Permitted	Installation of a replacement vehicular entrance to Curtis Green Gate and associated temporary fixtures.
Curtis Green Gate 19/05447/FULL	30/11/2016	Permitted	Provision of accessible ramped entrance and canopy, reconfigured stairs at ground and first



**Table 2.1: Planning History**

Application Ref	Decision Date	Status	Description
			floor level, installation of mechanical plant at second and fourth floor levels, alterations to lift overrun. Internal alterations including improvements to fire safety, security and access and insertion of a second lift.
Commissioners' Yard Gate 18/05074/FULL 18/05075/LBC	01/10/2013	Permitted	Temporary removal of three existing Catenary Lamp Standards of lighting columns located along Victoria Embankment outside the Norman Shaw North Building to allow implementation of the last phase of the Parliament Street, Bridge Street and Victoria Embankment Streetscape Improvement Scheme (RN: 10/02301) on completion of the works new lighting columns shafts and lanterns are to be installed within the original listed standards and column stumps.
1 Canon Row 16/07441/LBC 16/07412/FULL	09/01/2012	Permitted	Installation of automated access control mechanisms and associated service connections to doors within outbuildings of the Parliamentary Estate.

### 3 Pre-Application Consultation

- 3.1.1 This section provides an overview of the formal pre-application process with Westminster City Council (WCC) and Historic England (HE), and other key stakeholders specific to the Norman Shaw North site.
- 3.1.2 The final design is the result of an extensive engagement process with statutory consultees. The proposed development was presented and discussed with WCC and HE at two formal pre-application meetings on 17<sup>th</sup> December 2020 and 17<sup>th</sup> February 2021.
- 3.1.3 Parts of the NEP2 proposals replicated in the Standalone application have been consulted on extensively with a wide range of statutory and non-statutory consultees. Consultation with WCC and HE on these aspects of the proposals has taken place since 2017 through regular, initially monthly followed by fortnightly, pre-application meetings. These parts of the proposals have also been displayed at a public exhibition in June 2019.
- 3.1.4 As a result of the consultation process, a number of substantial design changes have occurred. The final design incorporates feedback received during the pre-application consultation meetings.
- 3.1.5 Pre-application advice letters were received from HE and WCC on 01 March 2021 and 29 March 2021 respectively. The key points raised have been addressed in the Design and Access Statement and Heritage Impact Assessment in the landscape section (paragraph 4.1.52). Relevant page numbers where the plant enclosure and external landscaping have been addressed are set out in the summary below. Please note a site visit may be arranged to allow for viewing of the internals of NSN and its surroundings.
- 3.1.6 The key topics discussed during pre-application discussions and the design response within the proposals and application are summarised below.

#### Courtyard Roof

- 3.1.7 The proposed courtyard roof has been subject to a round of public consultation, where no objections to the proposed roof were received. In addition, feedback was received at pre-application discussions with WCC and HE. Both HE and WCC expressed a preference for a light weight, clear roof at NSN with a simple design. HE also supported the principle of a courtyard roof located at the fifth floor level of the building, and requested detail of a courtyard lighting strategy to be provided. Please refer to section 4.4 (Design Principles and Concepts) of the Design and Access Statement where the design approach and lighting strategy for the courtyard roof are discussed in further detail. Please refer to section 5 for detail of the proposals for the glazed roof.

#### Chiller Plant

- 3.1.8 The principle of locating the plant in an enclosure on the north elevation was supported in principle. The approach to the design of the plant enclosure was queried by WCC and HE, specifically whether the enclosure has to be completely open or if it could be covered with a roof, and how it will impact upon noise levels and vehicle movement around the site. In response, the Design and Access Statement Appendices incorporates a study to illustrate and assess the effect of a roof for the proposed plant enclosure, and confirms the approach not to provide a roof, and the associated rationale behind this design decision. The

proposals section of the Design and Access Statement also includes detail of the design for the plant enclosure. The noise and transport impacts of the plant are set out in the supporting Noise Impact Assessment and Transport Statement respectively.

#### Landscape

- 3.1.9 During pre-application discussions, WCC and HE expressed a preference for landscape proposals to be presented as a permanent new arrangement around NSN. In particular, WCC and HE stated the arrangement around the new entrance requires a solution that reads as a permanent and high quality space, and one way in which this can be achieved at the crossover would be to incorporate a paving design that references the original Whitfield stone paving design. Further information on the proposed landscaping scheme and paving design is set out in section 6 (Landscape) of the Design and Access Statement. WCC also questioned whether the tree to the west of the building would be affected by machinery requiring access to compactors nearby. The Arboriculture Statement confirms no impact upon the tree from vehicle and machinery movements.

#### South Passage and the Courtyard

- 3.1.10 The principle of reinstating the historic south passage route to the courtyard was supported in principle by HE, and detailed plans and elevations of the proposals were requested. The submitted drawings and section 5 of the Design and Access Statement include detailed proposals for the south passage.

#### Scaffolding

- 3.1.11 During pre-application discussions a hierarchy of scaffolding fixings was presented, setting out a sequential approach to fixings to minimise harm to building fabric. WCC agreed to the principle of the hierarchy, with further detail to be included in the application and a site visit to agree the type of fixings appropriate to certain conditions at a site visit, secured via a compliance condition. Further information on the proposed hierarchy, including indicative locations, type of fixings and methodology to make good is set out in the Design and Access Statement Appendix 4.

#### Archaeology and Basement Piling

- 3.1.12 During pre-application discussions with GLAAS the approach to relocate and deepen archaeological evaluation trenches in comparison to the NEP2 proposals was presented, so as to address the effects of basement piling included in the standalone proposals. GLAAS requested inclusion of the NSN deposit model and prior evaluation, which has been provided in the Archaeology Statement and WSI.

#### Bin Storage

- 3.1.13 Following initial engagement with WCC and HE on resetting the estate landscape and improving the environment around the existing bin and compactor location, further consideration has been given to improving on the current setting. Since the initial pre-application meeting the number of bins have been reduced down from 24 to 12. The compactors and bins have been set back from the 'street' to maintain sight lines around Laundry Road and bring the existing tree to the foreground as part of the resetting of the hard and soft landscaping proposals along Laundry Road.

## **4 The Proposed Development**

4.1.1 This section provides a summary of the Proposed Development, and should be read in conjunction with the supporting Design and Access Statement.

### **4.2 Description of Development**

4.2.1 The formal description of development is:

*“Full planning consent for the refurbishment of Norman Shaw North including the installation of a glazed roof covering to the internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); installation of chillers at ground level adjacent to the northern elevation; basement piling; alterations to the courtyard eaves to create a roof access gallery; alteration of the northern elevation; alteration of north western corner stepped plinth; alteration to Laundry Road landscape and levels to provide accessibility improvements; and crane gantry screw piling located in Commissioners’ Yard.*

*Listed Building Consent for the internal and external refurbishment, including installation of new building services and rooftop repairs and reconfiguration including rooftop louvres and reconstruction of chimneys; courtyard roof fixings; secondary glazing; and interiors; alterations to existing openings and basement vaults; and associated works including temporary construction works.”*

### **4.3 Summary of Proposals**

4.3.1 The proposals for NSN involve the creation of 528 sqm (GIA) additional floorspace alongside significant repair and refurbishment of all existing accommodation to meet modern workplace standards, address the historic lack of maintenance of the building and preserve the Grade I listed building for future generations.

4.3.2 Following completion, NSN will provide upgraded accommodation for passholders and their staff. Installation of a new lightweight glass atrium is proposed within the internal courtyard of the building to provide much needed additional accommodation within the building, including a self-service catering facility and informal meetings space. Building services and plant will be upgraded throughout the building, including the installation of new chiller plant to be located at basement level and in a plant enclosure on the northern elevation of the building, in order to support the essential MEP upgrades. Adjustments to landscape levels to Curtis Green Gate and Laundry Road provides improved accessibility to NSN and Richmond House as well as addressing logistics and waste management.

4.3.3 To support the development of NSN as a standalone project there are a number of adjustments to the basement and lower ground floor layout. This includes changes to support improved access and logistics and changes to the operational brief are provided at basement level, and operational facilities adjusted and enhanced to provide more showers and flexible locker provision. Changes to the lower ground floor, include re-introducing the

southern link from Commissioners Yard through to the NSN Courtyard; changes the catering facilities to enable full operation at grade; and spatial adjustments to the operational hub facilities.

4.3.4 The NSN standalone proposals have been developed to be delivered as an independent package of internal and external repair and refurbishment works to the building, whilst also being designed to be compatible with a comprehensive package of works including the envelope works of NSN or as a constituent part of a wider masterplan for the Northern Estate. As such the standalone proposals are compatible with and do not preclude the determination of the October 2019 NEP2 applications.

4.3.5 The NSN standalone proposals are summarised as follows:

- Glazed courtyard roof – installation of a roof above the internal courtyard at fifth floor level, to create a c. 400 sqm area of usable, high quality floorspace, consistent with the NEP2 proposals.
- Chiller Plant and revised servicing strategy – including a plant enclosure on the north elevation, and new plant throughout NSN to replace outdated plant and meet current regulatory standards, improve working conditions and secure future adaptability. The MEP strategy is consistent with that outlined in NEP2.
- Basement slab – alteration to accommodate plant and services distribution and ancillary areas.
- Piling – to the basement slab, lift pits, southern vaults and north east pavilion foundations.
- Courtyard openings alterations – reconfiguration of four arched openings at the north elevation, consistent with the NEP2 proposals.
- Internal refurbishments – across all levels of the building to meet modern workspace requirements. Includes retention and repair of existing interior features as much as possible. Existing fire places and doors to be relocated where not possible to retain in situ. New raft ceilings, replacement of timber framed fire screens and implementation of an upgraded lighting strategy. This is consistent with the NEP2 proposals.
- Access cores at east and west wings – to provide new accessible passenger lifts, WC accommodation and tea points included, consistent with the NEP2 proposals.
- New main entrance – principal entrance provided to give level access.
- Reconfiguration and replacement of Westmoreland roof slates - including reuse of existing slates, where feasible subject to condition, consistent with the NEP2 and NSN envelope proposals.
- Fabric improvements to 1950s roof extension – to improve water insulation and thermal performance, consistent with the NEP2 and NSN envelope proposals.

- Courtyard perimeter access gallery – realignment of courtyard eaves to improve roof maintenance access, consistent with the NEP2 and NSN envelope proposals.
- Reconstruction of five chimneys - adapts the building to accommodate necessary modern building services and meet ventilation requirements, whilst minimising impacts to built fabric, consistent with the NEP2 and NSN envelope proposals.
- Fabric repairs - a comprehensive package of structural and fabric repairs, including replacement of sections of rotten rafters, purlins and sarking boards, repair to steel rafters, replacement of leadwork, and repairs to the asphalt gutters and replacement of failing lead pipe outlets and downpipes. This is consistent with the NEP2 and NSN envelope proposals.
- Refurbishment of Northern Elevation - The proposals will remove the existing portacabins, temporary and redundant exposed services and repair and refurbish the building fabric, including the reinstatement of the granite window reveals to the north west corner.
- Façade works - a careful general uplift including: the removal of organic matter, rationalisation of services, and repairs to timber, brick and stone work at all façades of the building. This is consistent with the NEP2 and NSN envelope proposals.
- Window repairs and installation of secondary glazing - a comprehensive package of window repairs, consistent with the NEP2 and NSN envelope proposals.
- Courtyard – removal of portacabins and external furniture and fittings that detract from the setting of the Grade I listed building, consistent with the NEP2 and NSN envelope proposals.
- Oculus and railings - Full reinstatement of the oculus and railings as part of the re-setting of the courtyard space and facades.
- Stepped plinth - re-setting of the 1980s stepped plinth to the north and west to improve vehicular movement, provide improved pedestrian access and to enhance the day to day operations and logistics of NSN and the estate.
- Embankment forecourt landscape - low level planting to the green space lining the eastern façade of NSN, to ensure clear views of the significant architecture of the NSN building, and an evergreen backbone of native ferns and grasses with shrubs and perennials.
- North and West / Laundry Road landscape – repaving of surrounding landscape and alteration of floor levels to improve accessibility to NSN and RH.
- Commissioners' Yard crane gantry – to facilitate the distribution of material across the NSN standalone works construction site, whilst maintaining access to the estate via Commissioner's Yard Gate. The gantry will be secured using helical screw piles.
- Embankment forecourt construction site welfare – facilities for 300 operatives.

- Temporary window removal – some existing windows to be temporarily removed at six levels of the building to allow for a safe access route for delivery of large materials into the building.
- A hierarchy of scaffold fixings – to minimise the impact on the existing building fabric whilst catering for the likely varied conditions. The hierarchy of options includes: reuse of the existing mesh fixings (minimising the number of new fixings); and fixing to face of brickwork. The hierarchy will be followed sequentially to select the least invasive approach for varied conditions.

#### **4.4 Detailed Description of Proposals**

4.4.1 This section of the planning statement provides a detailed description of the NSN standalone proposals.

##### Courtyard

##### *Installation of Glazed Courtyard Roof Covering*

4.4.2 The proposed courtyard roof is contained within the existing envelope of the building and therefore does not affect any views to NSN. The design and positioning of the new roof aligns with the fifth floor and responds to the historic detailing and scale of the courtyard. It is fully glazed, supported by a lattice framework and a perimeter ring beam to look and feel as lightweight as possible, preserving views to the historic façade and roofscape beyond.

4.4.3 The roof will allow for provision of more useable space in NSN by enclosing the existing external area. The new roof optimises environmental performance by decreasing heat loss through historic windows and walls and reducing the area of the external envelope of the building.

4.4.4 Lightning protection will be incorporated as the existing protection system does not meet current standards or provide an adequate level of protection. The new system comprises bonding to the new courtyard roof and reuse of existing earth pits where possible, supplemented where required.

##### *New Courtyard Entrance and Paving*

4.4.5 Consolidation of two existing small openings to create an opening to a main entrance to the courtyard. New paving and level access is also proposed at the courtyard.

##### *Illumination*

4.4.6 A lighting strategy is proposed for the courtyard to light the courtyard floor. This is proposed to maintain the exterior quality of the space and avoid placing too great a focus on the roof.

##### *Removal of Modern Additions, including Portacabins*

4.4.7 A double height portacabin sits in the centre restricting views of the surrounding elevations, detracting from the setting of this Grade I listed building. The ground floor level roof and

courtyard base are also occupied by various modern additions such as plant and duct work, bike racks, wiring, and railings.

### *Oculus*

- 4.4.8 The current condition of the courtyard inhibits productive use of the space and diminishes the building's architectural value. Some remnants of the original courtyard oculus appear to be retained under the existing portacabins, with temporary portacabin supports running through to the basement level below.

The oculus top is understood to be covered over, but its exact condition will be unclear until the portacabins are removed. As part of the Standalone works the oculus and railings will be reinstated.

### Internal Proposals

#### *Revised Servicing Strategy and Chimney Reconstruction*

- 4.4.9 All MEP services are proposed to be renewed with regulation compliant MEP under a new servicing strategy appropriate for a modern workplace and carefully integrated within the historic building fabric. This is required as existing MEP installations are outdated and beyond their economic life expectancy.
- 4.4.10 Parliament's Strategic Vision for the Built Environment sets ambitious energy and sustainability targets including a 50% reduction in CO2 emissions across the Parliamentary Estate by 2030 and zero carbon by 2050. Upgrading services within NSN is an essential step in helping to achieve Parliament's strategic vision, and it is critical these works are carried out with the least harm to the significance of historic fabric. The reconstruction of the five chimney stacks adapts the building to accommodate necessary modern building services, whilst minimising impacts to built fabric.
- 4.4.11 The major refurbishment of the roof, dormers and chimney stacks provide an opportunity to reconstruct five chimneys to address fundamental building performance issues. Four of the chimneys are proposed to be reconstructed to accommodate ventilation requirements, whilst one chimney is required to be reconstructed to enable installation of a hot kitchen extract.
- 4.4.12 The NSN building services have not been significantly updated for 40 years, and as such office spaces regularly overheat in the summer, and in the winter occupants have to decide between ventilation or acceptable minimum internal conditions. The occupancy densities and internal gains within the space are compounded by inherently restricted window openings; and consequently natural ventilation strategies will not provide a comfortable working environment, commensurate with modern day standards. As such full mechanical cooling and ventilation is required and proposed.
- 4.4.13 Using CIBSE TM52 methodology, sensitivity analysis has shown that even by reducing occupancy density well below industry standards for office space and increasing window opening area to the maximum on a North facing elevation, office spaces will regularly overheat. Offices on all other elevations will be subject to even greater overheating. These results do not take account of climate change, which will further compound overheating issues.



- 4.4.14 The building services distribution and energy strategy for Norman Shaw North is dependent on improving the ventilation to the building. The proposals to refurbish NSN independently with a standalone heating and cooling solution would be able to be plugged into an estate-wide energy centre. Similarly, if in the future NSN forms part of a wider ambition for the renewal of the Northern Estate buildings, it would be able to plug into an estate-wide energy centre. The duct sizes, distribution routes, air intake and extract demands are required both for a NSN standalone scheme or the wider estate renewal project.
- 4.4.15 A range of options for the introduction of mechanical ventilation have been explored, concluding that the installation of ventilation in the attic spaces, combined with the use of the chimneys as the means for discharging ventilation extract air is the least intrusive approach to the historic building fabric. The re-servicing strategy is premised on the use of the 'lower significance' areas in the basement and attic space for major plant, where its impact on heritage is minimised. This is allied to decentralised vertical services distribution strategy within the building and venting via the chimneys.
- 4.4.16 The options and the rationale to support the NSN services strategy were shared with WCC and HE at a meeting on the 4th of December 2019, where it was acknowledged the chimney flues are redundant and their use to conceal services is in the spirit of the building and to an extent enables the continued use of the chimneys for their original intent – the discharge of air.
- 4.4.17 The partial, careful dismantling and reconstruction of the five chimneys has been developed in close collaboration with services and structural engineers, and allows the chimneys to be put back into use to service the buildings future energy ventilation requirements whilst safe guarding the building fabric and visual integrity of Norman Shaw North. The reconstruction of the five chimneys represents the least harmful approach to meeting the building's heating and cooling requirements as driven by the need to meet the relevant BCO standards and Parliament's strategic vision.
- 4.4.18 Subject to the condition of the chimneys following the erection of scaffolding and further survey works there could be a requirement to reconstruct the remaining three chimneys to address failing fabric, avoid further damage to the roof, and ensure the works extend the use of the building before further works are required.

#### *Passenger lifts*

- 4.4.19 A new lift core is proposed to the west, with the existing east core retained and modified to support the upgrade of lifts to NSN. The new arrangement seeks to balance vertical access between the east and west sides of the building in order to improve step-free access coverage within the building.

#### *Mist suppression system*

- 4.4.20 A mist suppression fire protection system will be installed to provide extensive coverage throughout the building, with misting heads to be mounted in raft ceilings or wide wall mounted where appropriate. All rooms are proposed to have the mist system installed, except those of high heritage significance and circulation spaces. However, if the existing fabric does not provide the required compartmentation, a mist suppression system will need

to be provided in corner rooms, however this is dependent on surveys. These will be integrated within new raft ceilings, integrated within new joinery or aligned with wall grilles.

#### *Small power and lighting*

- 4.4.21 Throughout the building, new final circuit small power and lighting will be installed. This does not include floor boxes, except in the covered courtyard where there are no floor voids or finished build ups above the structural slab that could accommodate these.
- 4.4.22 New low energy lighting will be provided throughout, including LEDs and daylight and absence detection in some areas.

#### *Radiators*

- 4.4.23 As part of the service renewal strategy, radiators are proposed to be removed, while those in corridor areas and in larger corner tourelle rooms will be refurbished and maintained and all historic radiators will be carefully recorded.

#### *Roof Proposals*

##### *Westmoreland Slates*

- 4.4.24 The existing condition of the roof is in critical need of replacement and repair, with failing slates and lead flashings, leading to internal water damage. The proposals include comprehensive replacement of Westmorland slates to match existing, with re-use of slates where feasible, subject to condition. Following erection of the scaffolding, all existing slates are proposed to be removed, surveyed and sorted to confirm suitability for re-use, and reinstatement, where possible.

##### *1950s Extension*

- 4.4.25 The lead flashings covering the roof of the 1950s northern roof extension are currently failing with drainage and insulation issues. The proposals aim to improve water management and thermal performance by re-roofing this area to match existing, including new insulation and lead lined gutters, this raises the roof slightly, but still sits below the surrounding parapet level.

##### *Courtyard Perimeter Access Gallery*

- 4.4.26 Historically poor access to the roof areas has led to intermittent and ad hoc maintenance and repairs which has resulted in further deterioration of the roof and building fabric. The proposals include the re-alignment of the eaves to the interior courtyard provides a new walkway, with an improved width and enhanced safe access for the inspection, maintenance and repair of the gutters, rainwater pipes and roof fabric.

##### *Fabric Cleaning and Repairs*

- 4.4.27 The existing roof is in a poor condition, with significant areas of loose, cracked and failing slate, and the leadwork and linings are in need of urgent renewal. Internal inspections show substantial decay of the interior fabric with evidence of existing and historic water damage, particularly around the dormer windows, chimney stacks and at the eaves.

- 4.4.28 The proposals include a comprehensive package of structural and fabric repairs, including replacement of sections of rotten rafters, purlins and sarking boards, repair to steel rafters, replacement of leadwork, and repairs to the asphalt gutters and replacement of failing lead pipe outlets and downpipes.
- 4.4.29 Early survey of all the chimneys and subsequent fabric and structural works form part of the refurbishment works and will include the replacement of cracked and failed Portland stone, the partial replacement and resetting of the coping stones and the replacement of eroded brickwork or poorly executed modern brickwork and pointing to the chimneys.

#### Piling

- 4.4.30 Piling is proposed to lift pits to limit settlement of the proposed lift structure and any differential movement which may adversely affect the new lift shaft and associated framing. It is also proposed at the southern vaults to target settlement and leaning away of the vaults, which may cause cracking and water ingress, as witnessed at NSS.
- 4.4.31 Piling is proposed at the north east pavilion foundations where additional support is required for a new concrete frame and heavy HV, UKPN and sprinkler tanks. Similarly, 72 minipiles are proposed in the basement to support heavy heating and hot water storage plant.

#### Façade Proposals

##### *Northern Elevation*

- 4.4.32 The north existing elevation is much altered from Norman Shaw's original design, primarily at basement and lower ground. A double storey top lit pavilion which housed two large examination rooms once occupied the north elevation. This was demolished when Richmond House was re-developed and the landscape ground plane to the base of the building was lowered. This has left significant scarring, 'internal' beams and columns exposed to the elements, infill modern brickwork, mortar repairs, painted brickwork and stone along with a plethora of permanent and temporary services. The northwest corner granite blind window reveals have been cut, lowered and altered and ends of steel beams remain embedded into the facing granite base.
- 4.4.33 The NSN Standalone proposals will see the removal of the existing portacabins, temporary and redundant exposed services and repair and refurbishment of the existing building fabric, including the reinstatement of stone window reveals to the north west corner, refurbishment of the existing iron columns and beams, removal of existing infill brickwork and replacement with a new façade with high level glazing.

##### *Plant Enclosure*

- 4.4.34 A new enclosure is proposed on the footprint of the original 'laundry' building, to house chiller plant that supports the essential NSN MEP upgrades.

##### *General Elevation Works*

- 4.4.35 Conservation façade cleaning proposals comprise a careful general uplift including: the removal of organic matter and repairs to timber, brick and stone work at all façades of the

building. The proposals also include review of all services fixed to external facade, including lighting protection and relocation or removal as required to support cleaning and repair of the facades.

#### *Window Repairs*

- 4.4.36 The proposals include a comprehensive package of window repairs. This includes: renewal and repair of the dormer roofs, including lead roofs, cheeks, and scarf repairs to timber elements; replacement of broken glazing panes; renewal and repair of hinges, stays and latches to match existing; general cleaning and renewal of paint based on paint analysis; repair to damaged exposed timber sills and frames; cleaning, redecoration and renewal of window ironmongery; and cleaning and redecoration of leaded windows, including iron frames and leaves, with renewal of quarries in some windows.

#### Courtyard

##### *Installation of Glazed Courtyard Roof Covering*

- 4.4.37 The proposed courtyard roof is contained within the existing envelope of the building and therefore does not affect any views to NSN. The design and positioning of the new roof aligns with the fifth floor and responds to the historic detailing and scale of the courtyard. It is fully glazed, supported by a lattice framework and a perimeter ring beam to look and feel as lightweight as possible, preserving views to the historic façade and roofscape beyond.
- 4.4.38 The roof will allow for provision of more useable space in NSN by enclosing the existing external area. The new roof optimises environmental performance by decreasing heat loss through historic windows and walls and reducing the area of the external envelope of the building.
- 4.4.39 Lightning protection will be incorporated as the existing protection system does not meet current standards or provide an adequate level of protection. The new system comprises bonding to the new courtyard roof and reuse of existing earth pits where possible, supplemented where required.

##### *New Courtyard Entrance and Paving*

- 4.4.40 Consolidation of two existing small openings to create an opening to a main entrance to the courtyard. New paving and level access is also proposed at the courtyard.

##### *Illumination*

- 4.4.41 A lighting strategy is proposed for the courtyard to light the courtyard floor. This is proposed to maintain the exterior quality of the space and avoid placing too great a focus on the roof.

##### *Removal of Modern Additions, including Portacabins*

- 4.4.42 A double height portacabin sits in the centre restricting views of the surrounding elevations, detracting from the setting of this Grade I listed building. The ground floor level roof and courtyard base are also occupied by various modern additions such as plant and duct work, bike racks, wiring, and railings.

##### *Oculus*

- 4.4.43 The current condition of the courtyard inhibits productive use of the space and diminishes the building's architectural value. Some remnants of the original courtyard oculus appear to be retained under the existing portacabins, with temporary portacabin supports running through to the basement level below.
- 4.4.44 The oculus top is understood to be covered over, but its exact condition will be unclear until the portacabins are removed. As part of the Standalone works the oculus and railings will be reinstated.

### Landscape

#### *West and North Landscaping*

- 4.4.45 Landscaping to the north and west of the NSN building is proposed to be simplified to provide level access, new paving and address logistics requirements for the site. The proposals are sensitive to the setting of the building, the paving at the cross over between Richmond House and NSN for example, references Whitfield's original paving design.

#### *Stepped Plinth*

- 4.4.46 The resetting of the plinth and steps to the north and south will help to establish the one-way system through the estate provide a safer environment for construction and business as usual vehicles and pedestrians, and provide improved pedestrian access. The intention is for vehicles to enter from the Embankment via Curtis Green Gate and Commissioners' Yard and exit via Derby Gate onto Parliament Street. Commissioners' Yard Gate can accommodate vehicles up to 10 metres in length due to site constraints, including loading on the London Underground and the position of the historic gate; whilst Curtis Green Gate can accommodate slightly larger vehicles.
- 4.4.47 Vehicles accessing through Curtis Green Gate need to perform a left hand turn around the north west corner of Norman Shaw North into Laundry Road, before turning right into Derby Gate to exit on Parliament Street. The steps on the north west corner of Norman Shaw North at the interface between Curtis Green and Laundry Road and Norman Shaw North restrict the available width for this movement. Steer's assessment included within the appendix demonstrates that 12m vehicles have to access via CGG and are unable to perform the turn left into Laundry Road with the steps in place. In order to facilitate large vehicle access into the Estate via CGG and Laundry Road the steps in the north west corner of Norman Shaw North need to be amended to allow for this manoeuvre without coming into contact with building fabric.
- 4.4.48 The existing 1980s granite plinth and steps will be reconfigured to provide; improved pedestrian access; logistics enhancements; and improved vehicle tracking along Curtis Green Gate and Laundry Road. The existing granite will be re-used and re-set as part of these modifications and enhancements.
- 4.4.49 As part of the site-wide vehicular improvements to the Estate, the aim is to create a new one-way route through NEP for large vehicles up to 12m length. Large vehicles will be able to enter through Curtis Green Gate and egress through Derby Gate.

#### *Eastern Forecourt*

- 4.4.50 The design proposals for the eastern façade landscape adjacent to Victoria Embankment will remain as per the October 2019 NEP5 Estate Landscape application. This includes low level planting to the green space lining the eastern façade of NSN, to ensure clear views of the significant architecture of the NSN building, and an evergreen backbone of native ferns and grasses with shrubs and perennials.
- 4.4.51 The existing railings fronting Victoria Embankment around the eastern façade landscaping will be renovated.

#### Enabling Works

##### *Crane Gantry*

- 4.4.52 A tower crane with crane gantry is proposed on Commissioners' Yard to facilitate the distribution of material in and around the NSN site and to assist with the transportation of material to and from the roof. The crane's location provides good access to the whole of Norman Shaw North roof and building, while maintaining good Business as Usual access into and around NEP.
- 4.4.53 The gantry is required to be supported by 16 helical or 'screw' piles. 'Screwing' foundations in the ground means that there is less soil displacement. On completion of the works, the piles will be unscrewed and removed, leaving no permanent structure below ground.

##### *Window removal*

- 4.4.54 11 windows are proposed to be temporarily removed on the north and south elevations to provide a safe access route for delivery of large materials in to the building at all building levels, from the proposed scaffold hoists. Once works are completed the windows will be carefully reinstated.

##### *Site Welfare*

- 4.4.55 Site welfare will be located in the Embankment forecourt, providing accommodation for 300 operatives.
- 4.4.56 The location on Embankment is the best location for the welfare, to minimise disturbance to day to day activities on the Estate and provide a safe and secure site environment for contractors. Benefits of this location include: direct contractor access from; the Embankment; clear separation between contractor and occupier access and circulation, minimising disruption to occupation, and enhancing security; a single consolidated location for site accommodation, creating an efficient collaborative working environment.
- 4.4.57 The site welfare will be a temporary installation, and will be carefully removed on completion of the works.

##### *Scaffolding*

- 4.4.58 The existing brickwork has undergone previous cementitious repairs and brick replacement, and there are significant areas of eroded brickwork particularly to the external perimeter facades. As part of the fabric works to the masonry there will be selective repair and

replacement of brickwork, to remove ferrous fixings, failing mortar repairs and eroded brickwork.

- 4.4.59 The team have engaged with WT Lamb & sons for the sourcing of matching bricks and visual inspection on site has currently established that WT Lamb & Sons Handmade Imperial Light Medium Red Rubber Multi-Facing brick is a good match and was recently used on the refurbishment of Westminster Cathedral.
- 4.4.60 Trailing of the compressive strength of the existing bricks and analysis of the mortar has been undertaken by Sandberg Consulting. The results show there is a high variability of the compressive strength of the existing bricks (8.8- 32.8Nmm<sup>2</sup>) and mortar is Portland cement and sand based which is generally of a 1:3-4 mix.
- 4.4.61 Pull out tests have been undertaken on the existing mesh fixings, which confirm a suitable strength of existing mesh fixings to support the scaffold in combination with additional brick face fixings. A hierarchy of options has been developed for scaffold fixings that look to minimise the impact on the existing building fabric whilst catering for the likely varied conditions. The hierarchy that will be followed sequentially to select the least invasive approach for varied conditions is set out below:
1. Reuse of the existing mesh fixings (to minimise the number of new fixings)
  2. Fixing to face of brickwork (with replacement bricks once complete)
- 4.4.62 The ambition is to utilise the existing mesh fixings, where possible, to reduce the number of new fixings. A hierarchy of options has been developed which requires the specialist contractor to sequentially test each option, to ensure the least invasive approach to the specific conditions found on site. This caters for the varied nature of the existing brickwork. The exact fixing type appropriate to typical conditions of the façade is proposed to be agreed on-site, as secured via a compliance condition. This approach has been agreed with WCC during pre-application discussions.
- 4.4.63 A specialist conservation contractor has developed two methods for removal, fixings and making good of existing facing bricks. The contractor will through assessment select the best method practicable ensuring damage is not occurred to adjacent masonry
- 4.4.64 Adopting the hierarchy of options provides an appropriate and considered set of solutions which will be sequentially applied to the varied and specific conditions, to ensure the least invasive option.
- 4.4.65 In developing the proposed menu of fixings, a number of alternative approaches to fixing scaffolding were considered and subsequently discounted. Please refer to the Design and Access Statement for details of the options appraisal.
- 4.4.66 For the most part, the Standalone proposals include works that replicate the works included in the NEP2 October 2019 NSN proposals, and the NSN envelope works.

## **5 Planning Policy Review**

- 5.1.1 The purpose of this section is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application relating to the Norman Shaw North Standalone proposals.

### **5.2 The Planning (Listed Buildings and Conservation Areas) Act 1990**

- 5.2.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on planning and listed building consent applications that affect the historic environment. Section 16 of the Act requires the decision maker when considering to grant Listed Building Consent to “...*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.*”.
- 5.2.2 Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to have ‘*special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*’ and, in respect of conservation areas, that ‘*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*’.

### **5.3 Planning Policy Framework**

#### National Planning Policy Framework

- 5.3.1 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted on 19 February 2019. The NPPF is a material consideration of significant weight in the determination of all planning applications and the Proposed Development is assessed against it below.
- 5.3.2 At the heart of the NPPF is the presumption in favour of sustainable development (Para 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of policies within the Framework. This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 5.3.3 Of particular relevance to this application is section 16 of the NPPF ‘Conserving and enhancing the historic environment’, specifically paragraphs 192, 193, 194, 196 and 200. These paragraphs are outlined in detail in the heritage section contained under 5.4 Planning Policy Assessment below.

#### The Development Plan

- 5.3.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for WCC comprises:



- The London Plan (March 2021);
- Saved Westminster Unitary Development Plan (UDP) Policies (January 2007); and
- Westminster's City Plan ('WCP') (November 2016).

#### Emerging Planning Policy

5.3.5 The proposals have also been developed and must be assessed with regard to emerging planning policy, afforded weight according to its current progress through the adoption process.

5.3.6 The City Council is currently working on a complete review of its City Plan. Formal consultation on Westminster's City Plan 2019-2040 was carried out under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 between Wednesday 19 June 2019 and Wednesday 31 July 2019 and on the 19 November 2019 the plan was submitted to the Secretary of State for independent examination. The Plan has now been found sound and the Inspector's final report was published on 19 March 2021. In the case of a draft local plan that has been submitted to the Secretary of State and found to be sound following an Examination, having regard to the tests set out in paragraph 48 of the NPPF, the WCP attracts significant weight.

#### Planning Policy Guidance

5.3.7 The Ministry of Housing, Communities and Local Government has prepared the Planning Practice Guidance (July, 2019) to provide guidance on the implementation of policies contained in the NPPF (February, 2019), the guidance has been considered where relevant to the Proposed Development.

5.3.8 The Greater London Authority (GLA) and WCC have also prepared a number of Supplementary Planning Documents (SPDs) which are relevant to the Proposed Development, and informed the design and application. These include:

- The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site Management Plan (May, 2007);
- International Council on Monuments and Sites (ICOMOS) 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' (January, 2011);
- Greater London Authority (GLA) 'London World Heritage Sites – Guidance on Settings' SPG (March, 2012);
- Greater London Authority (GLA) 'London View Management Framework' SPG (March, 2012);
- Greater London Authority (GLA) 'Central Activities Zone' SPG (March, 2016);
- Greater London Authority (GLA) 'Sustainable Design and Construction' SPG (April, 2014);
- WCC 'Whitehall Conservation Area Audit' SPG (December, 2003);
- WCC 'Development and Demolition in Conservation Areas' SPG (1996);
- WCC 'Archaeology and Planning in Westminster' SPG (1994);
- WCC 'Design Matters in Westminster' SPG (2001);

- WCC 'Designing out Crime in Westminster' SPG (1997); and
- WCC 'Inclusive Design and Access' SPG (2007).

#### Site Designations

5.3.9 The Norman Shaw North site is subject to the following policy designations, as identified in the WCC adopted Core Strategy Proposals Map and the London Plan:

- Core Central Activities Zone;
- Whitehall Conservation Area;
- Lundenwic and Thorney Island Area of Special Archaeological Priority;
- Flood Zone 3;
- Rapid Inundation Zone;
- Westminster Air Quality Management Area; and
- Thames Policy Area.

## **5.4 Planning Policy Assessment**

5.4.1 This section identifies the planning policies and material considerations pertinent to the Proposed Development. Section 70 (2) of the Town and Country Planning Act 1990 requires the Local Planning Authority to have regard to the development plan and any other material considerations; and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires the determination of applications in accordance with the development plan unless material considerations indicate otherwise.

5.4.2 This section assesses the Proposed Development in the context of the Development Plan and other material considerations, in relation to the following:

- Principle of Development
- Heritage
- Archaeology
- Townscape and Views
- Transport, Parking and Servicing
- Design and Accessibility
- Energy and Sustainability
- Flood Risk and Drainage
- Ecology
- Construction

## Principle of Development

- 5.4.3 The principle of development relates to the need to undertake urgent repair works to NSN in order to secure the long-term future of the building and wider Parliamentary Estate. This will be achieved by providing upgrades to the internals and externals of the building, which will allow for the continued Parliamentary use of NSN. The proposed development is required in order to secure the long-term viable use of the listed building, in accordance with paragraph 193 of the NPPF, which states *‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation’*, and paragraph 200 that recognises *“Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*
- 5.4.4 The principal intervention included in the proposals is the installation of the glazed roof covering to create a new high quality atrium space, housing a self-service restaurant and communal meeting and working space, similar to how the atrium in Portcullis House is currently used. The NSN courtyard will provide an environment to hold informal meetings, a restaurant space to fulfil the requirements of the Parliamentary catering strategy, and the opportunity to enjoy the courtyard setting of the Grade I listed Norman Shaw North building. This new space is required to provide much needed space across the Parliamentary Estate for communal working and informal meeting space, which are increasingly suited to modern ways of working and undertaking Parliamentary business.
- 5.4.5 As the proposals seek to recover and preserve existing historic interior features as much as possible, this means the existing cellular office space layout present within NSN is proposed to be retained throughout the majority of the building. As a result, there is limited opportunity within the building to provide informal, communal workspaces, as the old layout of the building will be largely retained. The option to create an atrium space at the courtyard therefore presents a logical solution to provide communal workspace that is suited to modern ways of working, without disrupting the historic layout and features of the building.
- 5.4.6 The proposals are driven by the requirement to improve the quality of passholders accommodation and ensure the long term future of the building in use as sustainable MP office space. There is a requirement to refurbish NSN to deliver increased environmental performance and improved safety and accessibility in line with Parliamentary requirements. The NSN proposals seek to make necessary upgrades to the building internally and externally, particularly to outdated building services; and secure the required quantum of floor space; in order to secure the long term viable use of the listed building.
- 5.4.7 The application site is located in the Core Central Activities Zone (CAZ) as designated in the London Plan, draft new London Plan, and associated SPG. The CAZ is defined by its location as the seat of Parliament and many government departments which, as detailed in the WCP and draft WCP, support Westminster’s World City functions which are of national and international importance. The protection and enhancement of these strategic functions within the CAZ is supported by London Plan Policy 2.10, new London Plan Policy SD4, WCP Policy S1 and draft WCP Policy 15.
- 5.4.8 In accordance with the above, the NSN standalone works seek to ensure the long-term use of NSN for Parliamentary use, and is therefore driven by needs of national importance. In

allowing critical upgrades to the building and enhanced environmental performance, the proposals support the enhancement of government functions and CAZ uses, and are therefore in full accordance with the planning policy framework. It is therefore considered that the principle of development is acceptable in planning policy terms.

### **Heritage**

- 5.4.9 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) is the legislative basis for decision making when determining planning applications that relate to the historic environment.
- 5.4.10 Section 16(2) of the Act requires the decision maker to 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, in considering whether to grant listed building consent.
- 5.4.11 Section 66 of the Act imposes a duty on local planning authorities when considering applications which affect a listed building or its setting to have “special regard” to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.4.12 Section 72 of the Act imposes a duty on local planning authorities when considering applications which affect buildings in conservation areas to pay “special attention” to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 5.4.13 In considering applications for listed building consent, or planning permission, local authorities are also required to take account of the policies in Chapter 16 of the NPPF. Paragraph 192 of the NPPF requires local planning authorities to take account of the following in determining applications:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.4.14 When considering the impact of a Proposed Development on the significance of a designated heritage asset, paragraph 193 of the NPPF states that “...*great weight should be given to the asset’s conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*”
- 5.4.15 Paragraph 194 of the NPPF states that “*any harm to or loss of the significance of a designated heritage asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings ... should be exceptional; and to grade II\* listed buildings should be wholly exceptional.*”

- 5.4.16 Paragraph 196 of the NPPF states that *“where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use”*.
- 5.4.17 Paragraph 200 of the NPPF states that *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals.”*
- 5.4.18 WCP Policy S25 states that Westminster’s extensive heritage assets will be conserved, including its listed buildings, conservation areas, Westminster’s World Heritage Site, its historic parks including five Royal Parks, squares, gardens and other open spaces, their settings, and its archaeological heritage.
- 5.4.19 Saved UDP Policy DES 10 states that applications for development involving the alteration of listed buildings will, where relevant, need to include full details of means of access, siting, design and external appearance of the Proposed Development in order to demonstrate that it would respect the listed building’s character and appearance and serve to preserve, restore or complement its features of special architectural or historic interest.
- 5.4.20 Policy 38 of the draft WCP again focuses on seeking to enhance significance and avoiding or minimising harm, while carrying out necessary upgrades to improve environmental performance and accessibility.
- 5.4.21 A summary of the heritage significance of the various designated heritage assets relevant to the Norman Shaw North site, and detailed assessment of the impacts of the Proposed Development, is set out in the supporting Heritage Impact Assessment, prepared by DIA.
- 5.4.22 As outlined in Section 2.3 above, the application site lies within the Whitehall Conservation Area and within the setting of the Grade II\* listed Norman Shaw South building, and Richmond House. The Norman Shaw North building itself is Grade I listed and is of high heritage significance. The building’s significance as the outstanding work of architecture on the Northern Estate has been particularly important in informing the design proposals for the building.
- 5.4.23 The Historic Impact Assessment sets out a detailed description of the building’s architectural and historic significance. The following features are of the highest significance and most sensitive to change, including:
- The pendentive towers at the corners;
  - The gables, pediments and lofty banded chimney stacks which form the roofscape;
  - Portland stone detailing including rusticated porticoes and broken pediments;
  - High-quality materials;
  - The internal courtyard elevations;
  - The use of high-quality materials throughout;

- The 1913 bronze memorial medallion to Norman Shaw by W R Lethaby and Hamo Thornercroft on the east elevation;
- The segmental arched bridge of stone banded with red brick linking Norman Shaw North and South; and
- The gates and piers between Norman Shaw North and South buildings

5.4.24 The Heritage Impact Assessment, also identifies areas which detract from the significance of Norman Shaw North, including:

- The alterations made to the north elevation where single-storey buildings have been removed leaving an unresolved elevation at ground floor level, which was never intended to be exposed;
- The public realm in and around Norman Shaw North is generally of poor quality and detracts from its setting and that of other designated assets and, consequently, makes a negative contribution to the character and appearance of the Whitehall Conservation Area;
- A temporary portacabin and unsightly waste and bicycle storage in the internal courtyard which obscures the elevations and demeans the space;
- Modern gates and temporary buildings around the site;
- Poorly designed modern plant, ductwork and other services which obscure the original architecture, inside and to the elevations of the building;
- The concrete roof covering to the single-storey courtyard projection;
- The suspended ceilings throughout most of the building which conceal ceilings and alter the volume of the associated rooms and corridors;
- The 1970s glazed doors and panels throughout the corridors and stairwells;
- Modern wall-mounted trunking in the rooms housing services;
- The modern carpets which likely cover original floor coverings; and
- The modern net curtains serving the windows facing the courtyard.

5.4.25 The proposed development comprises a comprehensive package of internal and external refurbishment and repair works, which will right many years of underinvestment, lack of maintenance and inappropriate additions, and ultimately ensure that the building and its special interest is preserved for generations to come.

5.4.26 The Heritage Impact Assessment sets out a description of the proposals and assesses their impact on the building's significance. A summary of the proposals impacts is provided below:

#### Proposals for the Roof

- *The glazed roof would not cause harm to the significance of the listed building. The NPPF guidance is clear that 'it is the degree of harm ... rather than the scale of the development that it is to be assessed'. While the scale of the alteration is significant, when it is considered in tandem with the benefits brought about by this aspect of the*

*proposals, no harm to the significance of the listed building can be found. The harm is mitigated by the design of the new architecture and the significant benefit of putting this space to good use, and increasing the people's ability to experience and appreciate the listed building's internal courtyard. The proposal is accompanied by the removal of features in the courtyard which detract from the significance of the listed building and its setting, which would be a benefit. Restoration of the central oculus and well-designed modern features such as the new entrance door to the building and the terrace balustrade will enhance the quality of the space, complementing the original architecture.*

- *The proposed alterations to the roofs would cause no harm to the listed building or the conservation area, and the repairs would be beneficial. The roof is a highly important feature of the building but the proposals are minor in nature and sympathetic to its original character and appearance. The careful design and positioning of the louvres on the inward-facing roofs would mitigate any potential for these to cause harm. The careful rebuilding of five chimneys in facsimile, to incorporate a new kitchen flue and air extraction, would mitigate any potential for this to cause harm, and this clever solution to the problem of extraction would mean there were no external flues marring the building's elevations. The renewal of the flat roof of the lodges, which are not visible from the public realm and have modern finishes, would cause no harm.*
- *The proposed ventilation strategy at roof level would be sensitively incorporated into the fabric of the building; it would be mostly concealed in views and would result in a limited alteration of historic fabric. As such, it would cause limited 'less than substantial' harm to the significance of the listed building.*
- *Resolving drainage issues would be beneficial to the listed building and cause no harm.*

#### Proposals for External Elevations

- *The comprehensive repair of the elevations would improve the appearance of the building, preserving its significance and enhancing the character and appearance of the conservation area.*
- *The proposals would be beneficial to both the listed building and the conservation area in that it would 'finish' an elevation which bears the unsightly scars of the demolished laundry building while retaining historical features of interest such as the iron columns. The proposed chiller plant enclosure and the associated chillers would also be comfortably accommodated in this location as there was originally a single storey structure that has been removed. The enclosure would also be of an appropriate scale and has been designed with an architectural language and materials that would complement the character of the listed building.*
- *The secondary glazing would cause no harm to the listed building and the removal of the window bars would be beneficial to both the listed building and the conservation area. Any damage caused by the fixing of the new secondary glazing would be made good in a like-for-like manner.*
- *No harm would be caused to the listed building or the conservation area from the new glazed automatic sliding doors on the west elevation.*
- *Addition of louvred panels to the link bridge would cause minor 'less than substantial' harm to the listed building and no harm to the conservation area.*

## The Proposals for the Courtyard Elevations

5.4.27 All of the internal courtyard elevations would be altered by the addition of a new glazed roof to the courtyard between the fourth and fifth floors in order to make the courtyard into a useable internal space, which may result in some harm. The proposal involves no disruption of the original fenestration and would be below the eaves line of the elevations and thus would not impact on the original roofscape; it would also allow the majority – bar the uppermost, fifth storey – of the original internal courtyard elevations to continue to be appreciated from within the courtyard.

- *The magnitude of the proposals and the high significance of the internal courtyard elevations mean that the impact of this aspect of the proposals should be carefully considered. Any potential harm, however, is mitigated by several factors. Overall this aspect of the proposals would not cause harm and the listed building, its setting, and the character and appearance of the conservation area would be preserved and enhanced.*
- *These changes would overall be beneficial as they would restore dignity to this impressive space, which has been cluttered with portacabins, bikes and bins. Natural stone would be close to its original Yorkstone finish and is therefore sympathetic to the character of the historic building. The reinstatement of the oculus with its railings would be a heritage benefit. There would be some limited 'less than substantial' harm caused by the removal of the original grilles, areas of granite flooring and limited sections of railings, but overall the proposals for the courtyard would benefit the listed building because they would enhance people's ability to appreciate its significance. They would also profoundly improve the setting of the listed building.*
- *The addition of discreet and sensitively positioned lighting would cause no harm to the significance of the listed building.*
- *These changes would be beneficial in that the modern joinery, which is not particularly sympathetic to the historic building, would be removed.*
- *No harm would be caused to the listed building from the installation of a new rainwater pipe.*
- *The removal of the early-20th-century stone steps and the reinstatement of the associated window would be beneficial. No harm would be caused and the proposals have the considerable benefit of improving level access to the building in a sensitive manner, which would enhance people's ability to appreciate its significance; this is a public benefit.*
- *No harm would be caused. The proposals affect fabric of medium significance and have the benefit of improving the overall appearance of the single-storey range, which is currently marred by ad-hoc alterations.*

## Landscape

- *These proposed works to a 1980s addition (granite stepped plinth which runs across the northwest corner and western elevation) would not cause any harm to the significance of the listed building or the conservation area.*
- *Overall, it is considered that these minor proposed works would have negligible impact on the setting of the listed building and the character and appearance of the conservation area and would cause no harm.*



## The Proposals for the Interior

- *No harm would be caused. The proposals for new lifts, tea points, WCs and service risers in these locations would have a considerable impact, but the significance of the fabric at affected is of modest or negligible significance, mitigating the potential for harm. The proposed alterations are centred on areas which have been remodelled in the past, which lessens their overall impact.*
- *Adaptations to the plan form would result in minor instances of harm, but would be broadly beneficial because the building would continue in its historic use. The changes to the doors between rooms are largely reversible as the historic doors would be retained and fixed shut. The alterations have been kept to the minimum necessary to achieve the number and size of offices required by the brief.*
- *Although the proposals do not include full details of the proposed interior design scheme, the general approach has the potential to be beneficial given that the current interior design conceals or some historic features and finishes and is not in keeping with the character of the building.*
- *While the replacement of several original doors and the alteration of a number of original doors would result in the loss of historic fabric, thereby causing some 'less than substantial' harm, this would be in part mitigated by the reinstatement of the existing design and detail, in addition to the provision of adequate fire protection for the occupants.*
- *The service risers in areas adjacent to the new lifts or in existing risers would cause minimal harm because these areas have already been altered or the risers are already in existence. The conversion of a lift shaft to a riser would be comfortably accommodated.*
- *The rafts would cause harm by altering the proportions of the rooms, obscuring the cornices and, in some places, blocking the tops of the windows or the architraves; original fabric – sections of the walls and cornices – would also be harmed. However, this harm would be in part mitigated by the fact that the rafts would replace suspended ceilings added in the 1970s, which are of a poor design quality, and that these alterations are largely reversible.*
- *Replacement of 1970s screens and doors would be beneficial, as they are unsympathetic to the character of the corridor spaces. The modern equivalents would be less obtrusive and would be held open unless activated by the fire alarms, lessening their impact on views along the corridors. Improving fire safety in a manner sympathetic to the historic building is also a benefit.*
- *The removal of the historic radiators would cause minor harm to the significance of the listed building, but this would be part mitigated by the retention of these units for possible relocation elsewhere on the estate.*
- *The misting fire protection system has been sympathetically designed and would not be located in highly sensitive areas. It would be comfortably accommodated within ceiling rafts or on walls, where appropriate. It would also provide fire protection to both the building and the occupants. It would not cause harm to the significance of the listed building.*

## Temporary Proposals

- *The proposed piling to support the temporary tower crane and gantry would not cause any harm to the adjacent Norman Shaw buildings as no fabric would be affected and the piles would be removed once the temporary gantry was removed.*
- *The proposed lateral restraints into the building fabric to support the scaffolding would have a varied impact on the significance of the building. The mesh fixings have already caused harm to the listed building and utilising these fixings would cause no further harm. Fixing into the face of the brick would cause some limited harm. However, the scaffolding is a temporary installation that would enable the full repair and refurbishment of this Grade I-listed building, and all fabric would be fully repaired following its removal.*
- *The listed building would be concealed by scaffolding when this temporary structure is in situ and it would also read as a temporary structure in connection with the refurbishment works. As such, its impact on the setting of the listed building would be negligible. Re-landscaping would be beneficial and would improve the setting of the listed building.*
- *These proposed works (temporary window removal) would not cause any harm to the significance of the listed building.*

*The section of brick vault would be recorded, carefully removed and reinstated. As such, these proposed works would not harm the significance of the listed building.*

5.4.28 As outlined above, these are positive proposals that would, overall, preserve the significance of the listed building and enhance the character and appearance of the conservation area. Any harm resulting from the proposals could only be considered 'less than substantial' in accordance with the terminology of the NPPF and we consider that the level of harm to be low. Paragraph 196 of the NPPF states that any 'less than substantial' harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. The harm caused would be outweighed by the public benefits offered by the scheme, including:

- Repair and redecoration/refurbishment of special features internally, for example, the war memorial lamp, chimneypieces, doors, joinery and staircases, details to be determined in further detail in later design stages;
- Removal of 1970s suspended ceilings to reveal original ceiling heights and cornices;
- Removal of unsightly modern fire-doors and screens and replacement with better designed modern alternatives;
- Removal of later alterations to the floor plan;
- Reinstatement of the oculus and railings in the courtyard, which restores natural light to the basement areas;
- A well-designed terrazzo floor finish within the courtyard;
- The comprehensive cleaning, repair and refurbishment of the exterior of the building, including the principal elevations and roofs;
- The improvement of safe access at roof level;

- The rationalisation and improvements to the lower-ground-floor level of the north elevation;
- The removal of the modern portacabins, bins and cycle storage facilities from the courtyard, which detract from significance;
- The removal of the modern portacabins from the northern elevation;
- The removal of later louvres and rooflights from the roof and replacement with well-designed louvres on the inner-facing slopes;
- Rationalisation of mechanical, electrical and plumbing services, removing unsightly service runs and plant areas and replacing these with better designed modern alternatives. The reconstruction of the five chimneys to accommodate necessary modern building services contributing to Parliament's 2050 zero carbon target; and  
Improvements to the setting of the building, by removing the granite 'skirt' added in the 1980s, restoring the original ground level, and implementing new paving and a new well defined entrance.
- New interior design which is sympathetic in approach to the historic character of the building, to be determined in further detail in later design stages;

5.4.29 Overall, the architectural and historic interest of this Grade I-listed building would be preserved and enhanced by the proposals, as would the character and appearance of the Whitehall Conservation Area. This fulfils the statutory requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990, specifically sections 16, 66 and 72 of the Act, which impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their setting and conservation areas and also to have special regard to the desirability of preserving the special architectural or historical interest of listed buildings and preserving or enhancing the character or appearance of a conservation area.

### **Archaeology**

5.4.30 The application site sits within the Lundenwic and Thorney Island Area of Special Archaeological Priority, as designated in Westminster UDP Policy DES 11.

5.4.31 Following an appraisal of Archaeological Priority Areas (APAs) produced by Historic England Greater London Archaeological Advisory Service (GLAAS) in March 2017, the draft WCP implements a revised regime of archaeological protection. This includes a system of tiers reflecting the archaeological significance and potential of each area, in which the Westminster and Whitehall APA is designated as Tier 1, indicating the highest level of sensitivity for the APA in which Norman Shaw North is located. The GLAAS appraisal states that this results from the APA containing a World Heritage Site of outstanding universal value, and encompassing a historic proto-urban/urban area with a great breadth and importance of known and potential archaeological remains within it. In particular, the Norman Shaw North site holds a unique position for the study of the archaeology of royal and national government from the 11<sup>th</sup> century to the present day.

5.4.32 The Norman Shaw North site is protected through London Plan Policy HC1, which states that development proposals should identify assets of archaeological significance in order to avoid

or minimise harm through appropriate mitigation and, where applicable, make provision for the protection of significant archaeological assets and landscapes.

- 5.4.33 WCP Policy S25 states that Westminster's archaeological heritage will be conserved, with draft WCP Policy 40 requiring development proposals in Tier 1 locations to be accompanied by an archaeological desk-based assessment and, where appropriate, field evaluations. In response, the Archaeological Statement confirms that there is high archaeological potential for discoveries of late medieval remains of medium or high significance, dependent on how well preserved they are, and of post-medieval remains of low or medium significance, at the Commissioners' Yard extent of the site.
- 5.4.34 The 16 piles proposed as part of this application to support the crane gantry at Commissioners' Yard would involve the removal of archaeological remains within the footprint of each pile. This would possibly include palaeoenvironmental remains, later medieval land reclamation deposits and features and later medieval and early post-medieval river embankment and riverside feature remains which would be of low to medium significance depending on survival and type. The impact of the 72 minipiles proposed to the basement slab will be addressed through a set of deep trenches, as set out in the supporting Written Scheme of Investigation (WSI). In particular, three trenches (nos. 2, 4, and 5) will address the impact caused by the piling and will be excavated down to 2m BGL which is the expected depth of the alluvium on site.
- 5.4.35 A watching brief and series of five trenches and two boreholes are proposed in the supporting WSI to mitigate any potential impacts, and to be agreed with WCC and HE.
- 5.4.36 In conclusion, it is considered that the Proposed Development accords with Paragraph 200 of the NPPF, London Plan and saved UDP Policies DES 9 and DES 10 and WCP Policy S25. The Proposed Development is therefore acceptable in heritage terms.

### **Townscape and Views**

- 5.4.37 The London View Management Framework (LVMF) designates, twenty-seven views of London to help preserve London's built character and heritage. These are classified in three ways: panoramas across substantial parts of London, broad prospects along the River Thames, or views of the urban townscape. The LVMF is given policy weight in London Plan Policies HC3 and HC4 which state that development proposals should not harm and should seek to make a positive contribution to the characteristics and composition of these views.
- 5.4.38 The protection of important views is reflected in the adopted and draft WCP, which identify views within and across Westminster as an essential part of the city's heritage. WCP Policy S26 confirms that these strategic views should be protected from inappropriate development, and also seeks to protect locally-designated views from intrusive or insensitive development. Draft WCP Policy 39 encourages a proactive approach to view enhancement, whereby development should make a positive contribution to and demonstrably enhance the characteristics, composition and significance of designated strategic views and protected vistas.
- 5.4.39 The contribution of Norman Shaw North to the townscape along the Thames is recognised by a number of designated views in the LVMF, including River Prospect 17A: Golden Jubilee/Hungerford Footbridges, River Prospect 18B: Westminster Bridge, and River

Prospect 21A: Jubilee Gardens and Thames Side in front of County Hall. The buildings are also an integral part of numerous metropolitan and local views.

- 5.4.40 The Norman Shaw North proposals are contained within the existing envelope of the building. Externally visible proposals include the addition of the chiller units on Curtis Green, which are largely screened from view from the Victoria Embankment by Curtis Green Gate. Internally to the estate the chiller unit will be visible in views along Curtis Green and from upper floors of buildings, including NSN and Richmond House. Whilst the internal views are not considered to be of the same sensitivity as views from the public realm, the impact of the chillers is considered to be minimised as far as feasibly possible through a high quality design, developed in consultation with WCC and HE, as detailed in section 4.7 of the Design and Access Statement; and any potential impacts to be outweighed by the benefit of upgrading building services.
- 5.4.41 Other elements of the proposals that are visible, include minor alterations and repairs to the roofs, including facsimile reconstruction of five chimneys, and cleaning works, which overall restore and extend the longevity of the visual quality of Norman Shaw North, and contribute positively to townscape, views and the Conservation Area. This also includes landscaping works which will contribute to the visual appearance and setting of NSN, and a plant enclosure on the northern elevation which has been sensitively designed and will not be visible from external views towards NSN.
- 5.4.42 The presence of construction structures, including the tower crane, scaffolding and scaffold roof; in addition to the works to dismantle and reconstruct the five chimneys will have a temporary adverse impact on surrounding views and townscape. These effects are inherent to the type of development proposed, and are a common consequence of building activity in London, with no practical way of avoiding it. The temporary adverse effects are significantly outweighed by the positive contribution of the completed development on views and townscape, including the restored and repaired chimneys, roof and elevations.
- 5.4.43 The proposals result in temporary adverse impacts on townscape due to the presence of construction structures and the reconstruction of the chimneys. Following completion of the construction works, the proposals are considered to contribute positively to townscape and views through cleaning and repair works that enhance the visual quality of the building. The proposals are therefore in accordance with planning policy and guidance at a London and local level.

#### **Design and Accessibility**

- 5.4.44 The NPPF states that good design is a key aspect of sustainable development, helping to create better places in which to live and work. The design proposals were developed through an iterative process of consultation with WCC and HE, conforming to paragraph 128 which affirms the importance of early discussion between applicants and the local planning authority about the design and style of emerging schemes.
- 5.4.45 Paragraph 130 of the NPPF requires that design makes use of available opportunities for improving the character, quality and function of an area. This is supported by London Plan D4, which stipulates that development must provide a high quality design response with regard to existing spaces and streets, informed by the surrounding historic environment. London Plan Policy D3 also states that buildings and structures should be of the highest

architectural quality and complement local architectural character. Similarly, WCP Policy S28 states that only the best, exemplary design which respects and enhances the existing qualities and character of the city will be acceptable. Draft WCP Policy 39 states that new development must *“incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster’s world-class status, environment and heritage”*.

5.4.46 In accordance, the proposals seek to provide a high-quality design response to the existing heritage significance of Norman Shaw North and its context, while meeting space and function requirements for the building. This involves refurbishment and upgrade of outmoded office accommodation; and introduction of the glazed roof to take advantage of opportunities to increase intensity of use within the existing footprint of the NSN site. All repairs, refurbishment and minor new build elements have been designed in terms of form and materials to complement the existing features of the building, enable greater ease and enjoyment of use, and ultimately contribute to the preservation of the highly valued Grade I Listed Building.

#### Access

5.4.47 NPPF paragraph 127 states that development must create safe, inclusive and accessible places.

5.4.48 London Plan Policy D3 requires all new development to achieve the highest standards of accessible and inclusive design.

5.4.49 WCP Policy S28 states that development must incorporate exemplary standards of inclusive urban design and architecture. Draft WCP Policy 37.C introduces a requirement for people-centred design which incorporates inclusive and accessible design principles going beyond physical access to buildings to address easier, safer and more pleasant use of the public realm.

5.4.50 The proposals provide an accessible, cohesive and legible building which is integrated to its surroundings through improvements to accessibility within and between buildings, and is accessible within via step-free access throughout. Levels have been altered at external landscaped areas and within the building, with the aim of introducing level access to make the building and its surrounding spaces more accessible than the existing situation, which includes many routes with steps. The new internal courtyard is proposed to be adapted to provide level access from Laundry Road to address this. New lifts are also proposed within the building which help to eliminate routes with steps, therefore vastly improving the accessibility of the building for people in wheelchairs or with impaired movement.

5.4.51 As demonstrated the proposed design accords with planning policy at a national, regional and local level.

#### **Energy and Sustainability**

5.4.52 As noted previously, the NPPF establishes a presumption in favour of sustainable development. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining

planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.4.53 This is expanded upon in London Plan Policy SI12 *Minimising greenhouse gas emissions*, which outlines an energy hierarchy whereby development should:

- Be lean: use less energy;
- Be clean: supply energy efficiently;
- Be green: use renewable energy; and
- Be seen: monitor, verify and report on energy performance.

5.4.54 At the same time, a number of pieces of planning guidance emphasise the importance of a balance between energy efficiency and sensitivity to heritage assets. The GLA's Energy Assessment Guidance (paragraph 7.7) acknowledges that listed building status may restrict building work upgrades. This is reiterated in the Historic England Energy Efficiency and Historic Buildings Guidance Note, which states that certain classes of historic buildings (including listed buildings and buildings within Conservation Areas) are expressly exempted from the need to comply with the energy efficiency requirements of the Part L Regulations where compliance would unacceptably alter their character and appearance. The GLA Sustainable Design and Construction SPG states that more minor interventions should always be considered and undertaken before consideration is given to more major interventions. Vulnerable, difficult and contentious elements must only be upgraded if this is appropriate, practicable and the impact on heritage values and level of technical risk is shown to be acceptable.

5.4.55 In response, the proposed development has been designed to help contribute towards the requirement for zero-carbon development within the Mayor's energy hierarchy and the Parliamentary Strategic Vision, as far as reasonably possible within heritage constraints. This will be achieved via the reconstruction of five chimneys as part of a comprehensive package of roof works, to allow the chimneys to accommodate the installation of new services and provide ventilation to the building through a new MEP servicing strategy throughout the building, whilst minimising harm to historic fabric. In order to maintain internal comfort conditions and provide sustainable office accommodation commensurate with modern day standards, mechanical ventilation and cooling is required. A detailed discussion of the need to reconstruct the chimneys and provided updated services is provided at paragraphs 4.4.12 to 4.4.21 of this statement.

5.4.56 NSN will deliver significant carbon dioxide savings when compared with the building's current performance by incorporating renewed MEP services, enhanced secondary glazing, roof insulation and improved air tightness and lighting throughout the building.

5.4.57 The proposals therefore accord with sustainability policies in the London and Westminster plans.

## **Flood Risk and Drainage**

- 5.4.58 NSN is located in Flood Zone 3, the highest risk classification designated by the Environment Agency, and the Rapid Inundation Zone subject to flooding within 30 minutes or fewer should the Thames Flood Defences be breached.
- 5.4.59 London Plan Policy SI13 requires proposals to utilise sustainable urban drainage systems unless there are practical reasons for not doing so. The policy states that proposals should aim for greenfield run-off rates, while ensuring that surface water run-off is managed as close to its source as possible.
- 5.4.60 NSN is primarily at risk of flooding from the River Thames in the event of a breach of flood defences, although it does benefit from the Thames Tidal Defences. In the event of a breach condition, the lower ground floor and basement would be inundated, and refuge could be sought at higher floors or an evacuation route from the southern entrance to an unaffected area on Victoria Embankment could be used. However, as the proposed use at the ground and basement floor levels comprises plant space and front of house spaces rather than office spaces, it is considered there is a very low risk to users of the site in the event of flooding.
- 5.4.61 In order to mitigate any risk, it is intended that NSN signs up for the Environment Agency flood warning and alert system to obtain early warning of significant flood events in the River Thames.
- 5.4.62 While the proposed development does not increase the impermeable footprint of the site, use of sustainable urban drainage (SUDs) measures have been considered in line with the SUDs hierarchy. Use of living roofs, basins/ponds, infiltration devices, permeable surfaces and flood attenuation tanks are not viable due to the Grade I listed nature of the site and the constrained footprint. In order to minimise risk, excavation in basement areas has been limited as far as possible.
- 5.4.63 To account for flood risk from surface water and sewers, the landscaping proposals have taken into consideration the need for effective and sustainable drainage. Suitable landscaping levels are proposed around NSN to allow for effective site drainage away from the building.
- 5.4.64 The underlying London clay and spatial constraints associated with numerous critical external services laid at shallow depths in external site roadways around NSN, do not enable use of infiltration devices, permeable surfaces or external in ground tanked systems. As such, run-off rates will not be reduced to 50% of existing or greenfield rates. However, as the use of the building will be for offices and will not include any residential or sensitive uses, particularly at lower floors which will contain front of house and plant spaces, it is considered that this will not present an issue and there is no great flood risk to the site.
- 5.4.65 Whilst the nature of the site means it is not feasible to reduce run-off rates to 50% of existing or greenfield rates, the proposed development is not considered to materially alter the nature of use of NSN, or include any proposals that would increase the risk to users in the event of a flood. The proposed development is therefore considered to comply with the relevant planning policies.



## Transport

- 5.4.66 At national level, paragraph 102 of the NPPF states that development should take opportunities to promote walking, cycling and public transport use. Paragraph 110 states that applications for development must allow for efficient delivery of goods and access by service and emergency vehicles.
- 5.4.67 At regional level, the London Plan promotes development that will not adversely affect safety on the transport network, with London Plan Policy T4 stating that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance.
- 5.4.68 WCP Policy S41 requires all developments to prioritise pedestrian movement and the creation of a convenient, attractive and safe pedestrian environment, with particular emphasis in areas with high pedestrian volumes or peaks. Sustainable transport options will be supported and provided for, including providing for cycling facilities as part of all new development and reducing reliance on private motor vehicles and single person motor vehicle trips.
- 5.4.69 WCP Policy S42 and draft WCP Policy 26 state that freight, servicing and deliveries must be managed to minimise adverse impacts including through the use of off-site consolidation centres, shared arrangements, and/or restrictions on vehicles types or timings. WCP Policy S42 indicates that servicing and delivery needs will be fully met within each development site, except where WCC considers that this is not possible, in which case the servicing and delivery needs will be met in such a way that minimises the adverse effects on other highway and public realm users, and other residential or commercial activity.
- 5.4.70 The Transport Statement confirms and sets out all aspects of movement by passholders, staff and visitors and the servicing and delivery and waste collection requirements associated with the NSN Standalone proposals. Means of access and egress to the site by vehicles, public transport passengers, pedestrians, cyclists and those with reduced mobility are also considered.
- 5.4.71 There will be no direct external access points to Norman Shaw North from the public urban realm, which will instead be accessed internally via entrances at Laundry Road, Derby Gate, Canon Row and Commissioners' Yard Gate. In turn, these can be accessed from the range of controlled access points to the Northern Estate.
- 5.4.72 The proposals include provision of shower facilities for cyclists in the basement. The proposals also include the removal of portacabins and bicycle racks in the NSN courtyard, including 56 cycle parking spaces. Whilst existing utilisation of these spaces is low, alternative cycle parking will be re-provided in the Richmond House basement.
- 5.4.73 The partial removal of the NSN steps proposed in this application will help to establish the one-way system through the estate and provide a safer environment for construction and business as usual vehicles and pedestrians. The intention is for vehicles to enter from the Embankment via Curtis Green Gate and Commissioners' Yard and exit via Derby Gate onto Parliament Street. Commissioners' Yard Gate can only accommodate vehicles up to 10 metres in length due to site constraints, including loading on the London Underground and

the position of the historic gate; whilst Curtis Green Gate can accommodate slightly longer vehicles.

- 5.4.74 Vehicles accessing through Curtis Green Gate need to perform a left hand turn around the north west corner of Norman Shaw North into Laundry Road, before turning right into Derby Gate to exit on Parliament Street. The steps on the north west corner of Norman Shaw North at the interface between Curtis Green and Laundry Road and Norman Shaw North restrict the available width for this movement. Transport and movement consultants Steer has reviewed the movement of vehicles making this manoeuvre, including vehicle tracking. Steer's assessment demonstrates that 12m vehicles have to access via CGG and are unable to perform the turn left into Laundry Road with the steps in place. In order to facilitate large vehicle access into the Estate via CGG and to safely manoeuvre the north-west corner of Norman Shaw North without any impact on the pedestrian route connecting to Richmond House or historic building fabric, the partial removal and re-landscaping of the steps is required.
- 5.4.75 In summary, the Standalone Proposed Development complies with transport policy at the national, regional and local level, which seeks to direct development to areas of high public transport accessibility.

### **Ecology**

- 5.4.76 The Northern Estate comprises an area of buildings, hardstanding, amenity grassland, scattered trees and introduced shrub. The wider landscape consists predominantly of buildings with small pockets of green space, with the River Thames and St James' Park located in close proximity to the site.
- 5.4.77 National, regional and local planning policy places weight on enhancement of the natural and local environment through planning decisions, which therefore represents a key consideration for the current proposals.
- 5.4.78 Paragraph 170 of the NPPF states that planning decisions must contribute to and enhance the natural and local environment. One way in which this can be achieved is by protecting and enhancing sites of biodiversity, and minimising impacts on and providing net gains for biodiversity; coherent ecological networks that are more resilient to current and future pressures should be established.
- 5.4.79 This is used to identify a hierarchy in paragraph 175, also echoed in WCP Policy S38, whereby if significant harm to biodiversity resulting from a development cannot be avoided through relocation to a site with less harmful impacts, adequately mitigated or (as a last resort) compensated for, then planning permission will be refused.
- 5.4.80 National policy, through paragraph 174, also encourages opportunities to incorporate biodiversity improvements in and around developments, stating that plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. The conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species should be promoted; plans should identify and pursue opportunities for securing measurable net gains for biodiversity.

- 5.4.81 Draft WCP Policy 35 states that developments must identify and minimise potential adverse effects on species and habitats identified in WCC's forthcoming Green Infrastructure Strategy, and safeguard the appearance, setting and ecological, cultural and amenity value of biodiversity assets. Temporary or permanent developments that will have, or will be likely to have, any detrimental impact on any biodiversity asset in the city will not be permitted.
- 5.4.82 In response, the proposals have been developed with regard to the suitability of Norman Shaw North to support roosting bats, and suitable nesting habitat for breeding birds on roofs and window ledges during the nesting season. The Preliminary Ecological Assessment submitted in support of this application reports on a preliminary roost assessment and dawn nocturnal emergence / re-entry survey undertaken for Norman Shaw North. The report concludes that no evidence of a bat roost was observed; and works with the potential to impact nesting birds will take place outside the peak bird breeding season, or under the guidance of an appropriately qualified ecologist, with all site works ceasing if an active nest is discovered, until it is deemed inactive.
- 5.4.83 The Proposed Development also includes elements to enhance the biodiversity of the NSN site, including identification of planting opportunities at the eastern façade with an evergreen backbone of native ferns and grasses with shrubs and perennials proposed here.
- 5.4.84 The measures undertaken to safeguard biodiversity therefore according with London Plan Policy 7.19, WCP Policy S28, and draft WCP Policy 35.

#### **Arboriculture**

- 5.4.85 London Plan Policy G7 requires that existing trees of value are retained, and that any trees lost as a result of development are replaced based on the existing value of the trees removed. Policy G7 elaborates on this, requiring that new developments should generally include the planting of new trees, particularly large-canopied species.
- 5.4.86 In accordance, Saved Policy ENV 16 states that all trees in Conservation Areas and those subject to Tree Preservation Orders will be safeguarded unless they pose a danger to public safety.
- 5.4.87 The Whitehall Conservation Area Audit SPG states that trees are important elements in the character and appearance of a Conservation Area.
- 5.4.88 Draft WCP policy supports this, identifying that all of Westminster's trees contribute to London's reputation as one of the greatest cities in the world and have high amenity, environmental and townscape value. Draft WCP Policy 35 states that development should incorporate new tree planting proposals to provide optimum canopy cover, with the loss of trees considered only in exceptional circumstances.
- 5.4.89 The application is supported by an Arboricultural Statement, which includes a survey of the three London Planes trees in close proximity to the proposed site welfare on the Embankment, and one tree to the west of the site.
- 5.4.90 The Arboricultural Statement concludes with regard to the proposed site welfare location sited to the east of Norman Shaw North, the footings of the railings wall is fixed to the external basement wall and the concrete slab forming the ceiling of the basement vaults. In effect this creates a discrete shallow (3 to 400 mm) volume of soil in the forecourt of

Norman Shaw North, which is not physically connected to the area of soil to the east of the wall. Therefore there is no potential for tree roots from surveyed trees T4, T5 or T6 in the forecourt area. In addition the cabins will be carefully lifted onto the site and laid out in a manner, which will not require any pruning to the trees. Consequently the proposed Norman Shaw North welfare cabins will not result in any arboricultural impacts.

5.4.91 In addition the Arboricultural Statement confirms no impacts to the tree to the west of the site, where new landscaping is proposed nearby the existing tree. A site supervision report is appended to the Statement setting out how and when the site will be supervised and evaluated, including important construction dates where the trees will be closely monitored.

5.4.92 The proposed development and measures undertaken to safeguard the trees, therefore accord with London Plan policy G7, and WCP policy Saved Policy ENV 16.

### **Construction**

5.4.93 At a local level, WCP Policy S29 requires the development of projects with significant local impacts to mitigate, avoid or remedy environmental and local impacts in construction and operation, through compliance with the relevant parts of the Council's Code of Construction Practice. The draft new WCP reinforces Policy S29 with Policy 7, which states that the benefits of development must spread beyond the context of individual development proposals; development should be neighbourly by managing construction impacts on the operation of neighbouring uses and amenity of residents and visitors to the city.

5.4.94 The construction phase for the standalone proposals, including the provision of crane gantry piling, has the potential to impact on the Northern Estate and surrounding area in terms of noise and vibration, air quality and vehicular access to the Northern Estate. These are addressed in the accompanying Outline SEMP.

### Air Quality

5.4.95 The potential for dust and air pollution effects from the construction of the Proposed Development is deemed to be of low risk. A range of mitigation measures are proposed including good housekeeping, immediate clean-up of spillages, monitoring of dust deposition and soiling, and co-ordination of deliveries to prevent vehicles queuing on-site.

### Noise and Vibration

5.4.96 Noise and vibration levels will be assessed and monitored throughout construction, including identification of trigger levels at which noisy works will be alerted and investigated.

### Vehicular Access

5.4.97 Access for construction vehicles will be scheduled so as to ensure efficient loading and unloading of materials and prevent hold ups. Proposed routes will avoid using minor and residential roads as far as possible.

5.4.98 These measures will ensure that delivery vehicles have minimal impact and avoid nuisance on the surrounding roads close to the site.

5.4.99 Please refer to the Outline SEMP, submitted in support of this application for further information on how potential construction impacts resulting from the crane gantry piling will be managed.

## **6 Summary and Conclusions**

6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.

6.1.2 Section 16(2) of the Listed Buildings Act requires the decision maker to 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, in considering whether to grant listed building consent.

6.1.3 Section 72 of the Act imposes a duty on local planning authorities when considering applications which affect buildings in conservation areas to pay “special attention” to the desirability of preserving or enhancing the character or appearance of the conservation area.

6.1.4 This Statement assesses the Proposed Development against the Development Plan and other relevant national, regional and local planning policy. The principle of the Development accords with adopted planning policy and guidance. National policy, the London Plan and the City Plan all seek to secure the long-term future of designated heritage assets. Emerging planning policy comprising the Draft WCP (2019) also seek this outcome.

6.1.5 The proposals have been subject to a comprehensive consultation exercise involving pre-application meetings with officers from WCC and key consultees such as Historic England and GLAAS. The issues raised by these groups have been considered and incorporated into the development of the final proposals, where practicable.

6.1.6 The NSN standalone proposals seek to enable a comprehensive package of refurbishment and critical repair works to the internals and externals of the building, and take steps to fully refurbish the building and bring it up to modern standards, that would overall preserve the significance of the listed building and enhance the character and appearance of the conservation area, ensure that the building and its special interest is preserved, and safeguard the building’s operational life for generations to come. The proposals include a new courtyard roof to provide a communal area for informal gatherings, and a restaurant in the north wing with seating in the courtyard. This ensures more useable floorspace is delivered, securing the use of the building for MP office space. New chillers, including a new external plant enclosure will enhance the environmental performance of the building, further securing the long term of use of the building. Any harm resulting from the proposals has been minimised, and is considered to be outweighed by the significant benefits delivered through the proposals, including:

- Reinstatement of the oculus and railings in the courtyard, which restores natural light to the basement areas;
- A well-designed floor finish within the courtyard;

- The comprehensive cleaning, repair and refurbishment of the exterior of the building, including the principal elevations and roofs;
- The improvement of safe access at roof level;
- The rationalisation and improvements to the lower-ground-floor level of the north elevation;
- The removal of the modern portacabins, bins and cycle storage facilities from the courtyard, which detract from significance;
- The removal of the modern portacabins from the northern elevation;
- The removal of later louvres and rooflights from the roof and replacement with well-designed louvres on the inner-facing slopes;
- Rationalisation of mechanical, electrical and plumbing services, removing unsightly service runs and plant areas and replacing these with better designed modern alternatives. The reconstruction of the five chimneys to accommodate necessary modern building services contributing to Parliament's 2050 zero carbon target; and
- Improvements to the setting of the building, by removing the granite 'skirt' added in the 1980s, restoring the original ground level, and implementing new paving and a new well defined entrance.
- New interior design which is sympathetic in approach to the historic character of the building, to be determined in further detail in later design stages;
- Repair and redecoration/refurbishment of special features internally, for example, the war memorial lamp, chimneypieces, doors, joinery and staircases;
- Removal of 1970s suspended ceilings to reveal original ceiling heights and cornices;
- Removal of unsightly modern fire-doors and screens and replacement with better designed modern alternatives; and
- Removal of later alterations to the floor plan.

6.1.7 For the reasons outlined above, the principle of the development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth; conserving and enhancing the historic environment; and preserving valued townscape.

6.1.8 The Proposed Development therefore complies with all relevant policy and should be granted planning permission and listed building consent.