



77. Staircase 5ST1



78. Staircase 5ST2

3.4.150 There is a modern suspended ceiling over the landing and staircase, and modern carpet throughout. To the west of the landing there is an original painted timber casement window, with original painted sill and apron panel below. There is also an original timber window architrave, visible beyond the modern suspended ceiling as it has been set back. Adjacent, to the north, there is a pair of c. 1970s glazed timber doors with an overlight. There is original dado and skirting to this elevation.

3.4.151 To the south elevation there is a modern boxed-out riser to the centre with original dado and skirting, which has been matched in around the riser. To the southwest corner there is an original opening to the staircase beyond.

#### **5ST3 – Southeast Staircase**

3.4.152 Located above the footprint of the original principal staircase that runs from the lower ground floor to the fourth floor, this staircase was added in the 1970s and is an impressive copy of the original. There are no clear traces of the joint lines but archival evidence confirms that the staircase was extended from the fourth to the sixth floor. The modern string and dado follow the flights of stairs, also matching the original.

3.4.153 The staircase cuts across the original windows to the west, with the flight set back from the perimeter wall, leaving space between the modern staircase and original windows. There are two original windows, with painted timber architraves and timber casements. The sills are unusual as they have the original dado profile applied to the underside; this may have remained from the original room arrangement that this post-war stair was inserted into. To the north there is a modern door and architrave in the original style.

3.4.154 At the top landing there are modern dado and skirting matching the original profiles. There is no cornice to the staircase or landing. To the east of the landing, there is a pair of c. 1970s timber glazed doors with a glazed overlight. There is modern carpet throughout.

## Sixth Floor

### 3.4.155 6ST1 – Southwest Staircase

3.4.156 This staircase is the top terminating section of the post-war extension to the original staircase in the southwest corner of the building, with modern painted metal balusters and timber handrail matching the original staircase below. To the west and south elevation there is modern pipework running at low level. To the soffit of the opening to the top of the staircase there appears to be an original exposed steelwork, although this could be plaster imitating steel as seen at the lower levels of this staircase. There is no cornice at this level and there is modern carpet throughout.

3.4.157 To the west elevation of the top landing there are areas of original plain, painted skirting, which has been matched in to the other walls. To the north there is a modern painted timber door and architrave, while there is a pair of modern timber doors and architrave to the east. To the south of the landing is the modern lift enclosure.

3.4.158 To the west of the staircase, there is an original painted door and architrave floating above floor level. The position of the door illustrates that the levels have changed and that the door presumably corresponds to the original attic floor level [plate 79].



79. Staircase 6ST1

## **6ST2 – Southeast Staircase**

- 3.4.159 This level forms the top of the inserted 1970s principal staircase, which is a detailed copy of the original staircase below. The modern string and dado follow the flights of stairs, also matching the original. As with the floor below, the west flight sits back from the perimeter wall, leaving space between the modern staircase and original window. The window has original painted timber casements and original painted architrave and sill. Above there is a second original window, with painted timber frame and three fixed metal lights and one casement.
- 3.4.160 To the top landing there is modern dado and skirting matching the original profiles. There is no cornice to the staircase or lobby but the form of the original roof is visible with the sloping soffits to the top landing. To the east elevation there is a modern timber door with glazed panels and a modern architrave. There is modern carpet throughout.

## 4 Heritage Impact Assessment

### 4.1 Description of the Proposals

4.1.1 The brief for Norman Shaw North is as follows:

- Office space for 93 Members and 180 Member's staff at a 1:2 ratio to House of Commons accommodation policy (target space standards allow for 12.5sqm per Member and 7.5sqm per MP staff).
- Accommodation to be provided for the Shadow Cabinet and Opposition staff.
- Provision of open plan office space for 24 desks for the Parliamentary Research Unit (PRU).
- Additional tea points and print hubs with reference to BCO guidance.
- Meeting room provision to suit requirements.
- Provision of a self-service restaurant with 130 seated covers.
- Provision of space for operational staff (lockers, showers, changing and staff mess area).
- Provision of workshop space to meet current standards
- Upgraded plant and servicing to enable the building to meet current and future workplace standards.
- Improved security.
- Improved landscaping and access in and around the building, including a new step free entrance.
- Fire safety improvements and fabric upgrades.

- Facilities for cyclists to support sustainable travel and well being

4.1.2 The proposals would meet this brief by refurbishing the existing accommodation of Norman Shaw North throughout and by providing a glazed roof over the internal courtyard of the building. Each aspect of the proposals is described in detail below. In general, the refurbishment would include:

- New passenger lifts and firefighting cores in the east and west wings of the building
- Increased provision of WCs
- New service risers in each wing
- Strip out of existing services and provision of new services to provide heating, cooling and mechanical ventilation
- Remodelling of areas of the basement to provide plant areas
- New staircase between the sixth and seventh floors
- Level access
- A new scheme of interior design
- Installation of secondary glazing throughout
- Repair of historic fabric and finishes throughout.

4.1.3 The proposals are described in detail below, in the following order: the roof; external elevations; the landscaping; the courtyard elevations; landscaping; temporary works; the interiors generally; the basement; the lower ground floor; ground floor; first floor; second floor; second mezzanine floor; fourth floor; fifth floor; sixth floor; and seventh floor. The proposals for the roof and the external elevations affect the listed building and the

conservation area whereas the proposals for all other areas affect only the listed building.

#### The Proposals for the Roof

- 4.1.4 It is proposed to comprehensively repair the main roof. The slates would be lifted and relayed, reusing existing slates where feasible, while any required new slates would match the dimensions and colour of the existing. Other repair works relate to leadwork, stonework, gutters, and the underlying substrate above truss and rafter line. Sections of rotten rafters, purlins and sarking boards would be replaced, while insulation would be introduced between rafters.
- 4.1.5 The new roof covering would differ from the historical covering in that discreet louvres for ventilation would be inserted into the roof plane (described in more detail below). Otherwise, modern louvres and windows, which currently detract from the significance of the roof, would be removed.
- 4.1.6 The dormer windows would be repaired, although one would be adapted to provide maintenance access in the form of doors but it would retain its multi-paned appearance in the former location of the casement window.
- 4.1.7 The chimneys, gables and tourelles would be unaltered, but repaired (apart from where described below).
- 4.1.8 Five chimneys (one on the north wing, two on the east, and two on the west) would be carefully taken down and rebuilt in facsimile to incorporate a new kitchen flue (on the north wing) and air extraction for ventilation (on the east and west wings). The chimneys would be re-built retaining as much historic fabric

as possible. Where repairs are required, these would be completed as part of the broader repair and refurbishment of the external building fabric.

- 4.1.9 The roofs of the two 'lodges' on the Victoria Embankment would be replaced with new construction.
- 4.1.10 *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 using original fabric, 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.*
- 4.1.11 The roof ventilation strategy also comprises the provision of low-level perimeter louvres at the eaves level of the north, east and south courtyard-facing roof pitches. To accommodate the vertical louvres between the existing wrought-iron trusses, the lowest layers of purlins would be removed and the existing timber rafters would be modestly cut back by 500mm. New timber purlins would be installed between the wrought-iron rafters to provide necessary support. To conceal the louvres, a toe board is proposed below the mid rail of the existing perimeter roof railings, which is subject to further detail design. These new louvres would be PPC finished metal in a shade to match the

slates, and would only feature on the internal-facing slopes of the roofs, and located on the lowest portion of the slopes, so as to not be visible from the internal courtyard. These alterations would also create a new walkway, which would improve safe access for inspection, maintenance and repair.

4.1.12 *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 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.*

4.1.13 There is a small leaded roof area surrounded by a parapet at the centre of the west wing, which is currently failing and suffers from drainage issues. The roof would be raised slightly to enable the incorporation of appropriate falls, and insulation would also be added.

4.1.14 *Resolving these drainage issues would be beneficial to the listed building and cause no harm.*

#### The Proposals for the External Elevations

4.1.15 Internal and external surveys have been undertaken to determine the condition of the building fabric, which has informed a comprehensive scope of works, including repairs to stone, bricks, windows and rainwater goods; masonry cleaning is also proposed before repair works take place. Paint analysis results would guide the redecoration of the windows. Services fixed to the elevations would also be reviewed and would be relocated to support cleaning and repair, as required. New lightning protection would be installed to meet current regulatory standards. This would utilise existing routes, where possible, with additional drops

concealed behind rainwater pipes or architectural elements of the buildings – these are indicatively shown the drawings and will be subject to final development with the specialist and thorough site survey.

4.1.16 *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.*

4.1.17 Very few alterations are proposed to the external elevations. Secondary glazing would be provided throughout, with masonry testing taking place in advance to establish how these can be fixed to the historic fabric. Modern bars on the windows would be removed. Otherwise, the proposals relate to individual elevations and are described below.

4.1.18 *The secondary glazing would cause no harm to the listed building and the removal of the 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.*

4.1.19 On the north elevation, the proposed alterations are principally at lower ground floor level where there was previously a single-storey structure above a basement, since demolished, which has left an unfinished elevation that is utilitarian and unsightly. The existing portacabins, temporary and exposed services would be removed, and the building fabric repaired. The original iron columns which formed part of the frame of the original structure and the single-storey structure would be exposed and new metal panels and with clerestory glazing introduced between them. A new lead drip mould would also be introduced above for weather



protection. Further proposed works include the adaptation of a window opening, in the adjacent bay to the Curtis Green Bridge, to form a door. At the western end of the elevation, the original form of the windows would be reinstated, including two openings with louvres and the reinstatement of four glazed windows. Adjacent granite facings would be repaired. An existing opening in the lower ground floor fenestration would be adapted to form a new principal entrance to the building, retaining the stone voussoirs above in Shaw's original design.

- 4.1.20 The Design & Access Statement sets out the energy strategy and the various options that have been considered. This exercise determined that two external chillers are required, and it is proposed to locate these within an enclosure, adjacent to the restored iron columns where the single-storey structure has been removed. The enclosure would be similar to the lost single-storey structure in terms of height and footprint. It has been designed with an architectural language, including the addition of a base, body and head, with details such as posts and a cornice. The enclosure would be metal clad with wire-mesh ventilation panels and solid plinth panels.
- 4.1.21 A roof was considered as the chillers would be visible from views at the upper levels of the surrounding buildings. However, this would require c.80% free area to support the air flow and the resultant design and massing was considering to have a negative impact on the setting of the listed building; further issues are outlined in the Design & Access Statement. As such, a roof has not be included as part of the design.
- 4.1.22 *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.*

- 4.1.23 On the south elevation, no alterations are proposed. The modern door within the portico would be replaced with a new glazed entrance door, but this is set deep within the porch and so does not have an impact on the elevation. It is described in more detail in the section below discussing internal alterations. The southeast entrance from Commissioners' Yard is to be reactivated. This references the historic plans and would provide improved pedestrian access through to the courtyard. This would enhance the connection of the estate landscape to the new public functions of the covered courtyard.
- 4.1.24 *The reactivation of the southeast entrance door from Commissioners' Yard would be beneficial to the character of the listed building.*
- 4.1.25 On the west elevation, new glazed automatic sliding doors would be inserted with the existing arched opening at lower ground level. No historic fabric would be adversely affected.
- 4.1.26 *No harm would be caused to the listed building or the conservation area.*
- 4.1.27 The link bridge to Curtis Green, which is in the setting of Norman Shaw North, would be adapted by the addition of louvred panels

in a symmetrical arrangement within the existing lower two-window openings.

4.1.28 *This would cause minor 'less than substantial' harm to the listed building and no harm to the conservation area.*

#### The Proposals for the Courtyard Elevations

4.1.29 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 would provide a communal area for informal gatherings, and a restaurant in the north wing with seating in the courtyard. The new roof would be a fully glazed lightweight structure, supported by a lattice framework and perimeter ring beam in a diagrid form. The lightweight form preserves views through to the historic facades and roofscape beyond. Drainage and ventilation would be provided in the perimeter channel, located between the original elevations and the perimeter beam of the new roof. The structure of the diagrid roof would be carried by eight new steel beams, two for each wing, inserted between the fourth and fifth floors and supported on the masonry walls of the original building.

4.1.30 The location of the diagrid roof has been carefully considered. Options of locating the roof at various levels were explored and this location was selected because it involves no disruption of the original fenestration (which varies subtly on each elevation) 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.

4.1.31 The design of the roof has also been subject to careful scrutiny. A variety of options were considered for the shape of the roof: barrel, pyramidal, lantern and flat. The lightweight curved diagrid was selected as the least obtrusive option.

4.1.32 *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 harm, however, is mitigated by several factors, which are:*

- *the lightweight and unobtrusive design of the glazed roof;*
- *works of repair to the courtyard elevations which would accompany the proposals, for example removing modern service ducts and flues; the removal of modern portacabins, bins and bike storage which currently undermines the special character of the internal courtyard and inhibits people's ability to appreciate it; and*
- *the wider benefits of making the courtyard into a pleasant and usable space for all users of the Northern Estate;*

4.1.33 *While this element of the proposal would cause some harm, overall it would enhance the listed building, its setting, and the character and appearance of the conservation area would be preserved and enhanced.*

4.1.34 The courtyard itself would be levelled and paved in a natural stone finish with a darker-tone stone banding, while new metal grilles are proposed to the perimeter basement lightwells as part of the ventilation strategy, resulting in the removal of the original grilles and a limited section of railings. The existing openings in the grilles are wide and there is concern they would be a trip

hazard and that items would fall through. The new grilles would also be a similar language and material to the existing.

The central oculus, which in the original design provided light to the basement below, would be reinstated, as would the plain painted metal stick railings around it, the new design with a painted metal handrail. All the modern portacabins, bins and cycle storage facilities would be removed. Restaurant facilities would be introduced, including a flexible hot and cold counter and tills to ensure the space can be utilised for events.

- 4.1.35 *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.*
- 4.1.36 Wall-mounted vertical lighting bars are proposed close to the rainwater pipes. These would be carefully and sensitively installed with conduits being fixed through the masonry.
- 4.1.37 *The addition of discreet and sensitively positioned lighting would cause no harm to the significance of the listed building.*
- 4.1.38 Otherwise, alterations to the courtyard elevations would be as follows:

- 4.1.39 On the north wing elevation, the modern joinery and glazing to the lower ground floor openings would be removed. The original arched openings would be retained, with the new reveals faced in metal panels and the upper section of the arches would be infilled with perforated-metal panels backed with absorbent material to improve the quality of sound in the space. New serveries and food and drink counters are proposed within the openings.
- 4.1.40 *These changes would be beneficial in that the modern joinery, which is not particularly sympathetic to the historic building, would be removed. And the new metal panels would relate to the existing language of metalwork within the courtyard and around the building.*
- 4.1.41 On the north wing elevation, a new rainwater pipe to match the existing would be added.
- 4.1.42 *No harm would be caused to the listed building.*
- 4.1.43 On the east wing elevation, an existing window and door at lower ground level would be adapted to form a single, larger entrance to the building. This entrance would provide direct, level access from the internal courtyard to the lift cores and the main staircase and circulation spaces. The new entrance would have modern metal-framed glazed doors and a metal surround incorporating ventilation. The existing granite detailing around the openings would be retained where it corresponds to the new opening and otherwise replicated around the extent of the new, larger opening. Associated with the formation of the new entrance would be the removal of the early-20<sup>th</sup>-century stone steps, which were inserted as part of a fire strategy, and the fire-escape door would be reinstated as a window.

- 4.1.44 *This would be beneficial, particularly the removal of the early-20<sup>th</sup>-century stone steps and the reinstatement of the associated window. 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.*
- 4.1.45 The existing, historical downpipe, which has been altered from its original vertical route, would be restored to its original arrangement.
- 4.1.46 *This would be beneficial.*
- 4.1.47 On the south wing elevation, the modern roof of the single-storey range which runs along the southern side of the courtyard would be replaced and fitted with a new dark bronze metal stick balustrade with a timber handrail to provide a terrace on the roof. The cills of the two outmost windows at ground floor level would be dropped to form French doors leading from the internal corridor to the terrace. The glazing bar pattern of the French doors would be based on the design of the existing windows. Modern plant ducts and flues would be removed.
- 4.1.48 *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.*
- 4.1.49 On the west wing elevation, no changes are proposed, apart from those which affect all elevations, described above.
- Landscape
- 4.1.50 The granite stepped plinth which runs across the northwest corner and western elevation at lower ground floor level, which was added in the 1980s to deal with level changes, would be reconfigured and cut back locally using, where possible, the existing granite to enable large vehicles to safely manoeuvre around the corner. New metal posts with chain guarding are proposed at the perimeter of the plinth for safety.
- 4.1.51 *These proposed works to a 1980s addition would not cause any harm to the significance of the listed building or the conservation area. And would improve the safety for pedestrian movement through estate.*
- 4.1.52 To improve accessibility for pedestrians and to support operations of North Shaw North, the courtyard floor level would be raised to provide level access into the building. The current access from Laundry Road is not compliant. Improvements and adjustments to the levels along Laundry Road would provide new level access for pedestrians and improve operational and logistics aspects of the lower-ground-floor functions as a catering facility and event space. New raised levels are proposed to the main entrance on the western elevation with the raising of the footpath at the perimeter of the building and adjustment to the road levels with the introduction of two ramps. To accommodate the raising of the road, and to improve access and connection between Richmond House and Norman Shaw North, a new set of steps with retaining wall and flanking planters are proposed close to Richmond House. New handrails, upstands and planters are proposed, with the planter adding to the soft landscaping along Laundry Road. The bins that line the road would be relocated to the area with the compactors and consolidated behind the line of the existing retained tree.

4.1.53 *Overall, it is considered that these minor proposed works would modestly enhance the setting of the listed building and the character and appearance of the conservation area and would cause no harm. The proposals would also provide improved access between Norman Shaw North and Richmond House.*

#### Temporary Works

4.1.54 A temporary tower crane with a gantry is proposed in Commissioners' Yard, between Norman Shaw North and Norman Shaw South, to distribute material across the site during the works. The gantry structure would be supported by 'screw' piling, which would be removed on completion of the works.

4.1.55 *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.*

4.1.56 Scaffolding is proposed to the exterior of the building to enable the repair of the elevations and accommodate the roof works. Several scaffolding methods - including buttress scaffold, fixing through windows, and fixing into mortar joints - were explored but subsequently discounted; the reasons are clearly outlined in the Design & Access Statement. Fixing into the building fabric was consequently the most practicable method for providing lateral restraint to the scaffold. The compressive strength of the bricks was tested, which revealed that it is variable. It has, therefore, been concluded that a hierarchy of fixing methods would be employed, which would be followed sequentially to select the least invasive approach for varied conditions. The hierarchy includes: 1) utilising the existing mesh fixings (these were

installed in 2018 to provide a protective mesh as masonry was falling off the building); and 2) fixing to the face of the brick.

4.1.57 *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.*

4.1.58 Temporary welfare accommodation is proposed to the east of the building, behind the railings that face Victoria Embankment. It is anticipated that piles may be required beneath the basement area of the building to support the temporary structure; further investigation is required. This area is not accessible and contains a laid to grass lawn. The location of this structure would minimise disruption to the day-to-day activities. The lawn would be relandscaped following the removal of the structure.

4.1.59 *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. Relandscaping would be beneficial and would improve the setting of the listed building.*

4.1.60 A number of timber casement windows (11 in total) in the north and south elevations would be temporarily removed to facilitate safe access and the delivery of large materials at every level. The windows would be carefully recorded and set aside in controlled,

protected areas within the Estate, in preparation for reinstatement on completion of the works.

4.1.61 *These proposed works would not cause any harm to the significance of the listed building.*

4.1.62 An opening would be temporarily formed in the floor of the central courtyard to enable the safe removal of material from excavation and for the delivery of the piling rig and equipment. Several alternative locations have been assessed but this location provides sufficient access for piling rig and also safe operation from the crane position. The works would involve the removal of a section of brick vault at basement level.

4.1.63 *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.*

#### The Proposals for the Interiors Generally

4.1.64 New lifts would be provided in the east and west wings. New tea points, WCs and service risers would be provided in the same areas. This would involve the wholesale remodelling of these discrete areas, including the removal of the historical floorplate and all existing walls, partitions, finishes and features. In the east wing, the new cores would be provided in the location of the existing lifts, inserted in the 1970s, but they would be reduced from three to two lifts. In the west wing, they would be provided in an area where the original plan form has been altered since its construction. It was originally the location of a staircase and WCs but by 1943 the staircase had been removed and additional WCs provided in its place.

4.1.65 *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.*

4.1.66 In general, aside from these areas, the proposals generally are to maintain the existing, historic plan form across all floors. The cellular plan would continue to perform its original and historical function as individual offices. In some locations, doors between offices would be fixed shut and acoustically lined on one side. In other places, new lobbies would be provided within the rooms, for reasons of fire protection.

4.1.67 *These 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.*

4.1.68 An internal repair and cleaning strategy has been developed; please refer the Design & Access Statement for a detailed approach to repairs.

4.1.69 A new interior design scheme is proposed, but this is still evolving. The terrazzo and mosaic floors in circulation spaces would be uncovered, repaired and consolidated where possible, this is subject to further investigation and site survey on the building is vacated. Paint analysis is also proposed in a number of interior spaces and the proposed colour palette would take the

results into account. The lighting proposals are being developed but would include, for example, globe pendant lighting in primary corridors and lift lobbies.

- 4.1.70 *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.*
- 4.1.71 Regarding existing doors, some original doors in main corridor areas would be replaced in connection with the fire strategy to achieve 60 minute fire protection, where required. The replacement doors would match the existing doors in detail and profile, with modifications to the door frame to accommodate increased door thickness requirements. All stop beads are to be replaced with hardwood to match existing profiles.
- 4.1.72 Alterations are also proposed to the majority of the original doors in corridors to achieve 30 minute fire protection. The existing 'papier mache' panels would be replaced by a wood-veneer-faced fire rated board. The existing softwood deal beading would be replaced with hardwood to match the existing profile.
- 4.1.73 *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.*
- 4.1.74 The strategy for servicing relies on providing a new service riser in each wing, thus avoiding the need for multiple service risers or a

single, intrusive riser in the internal courtyard which would have attendant problems of increasing the need for horizontal distribution, particularly in the vaulted corridors. The construction of the new risers would require the careful removal of localised areas of the original floorplate.

- 4.1.75 Some service risers would be located in the areas adjacent to the new lifts or in existing risers. The passenger lift in the open well of the SW staircase would also be converted to a riser.
- 4.1.76 *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.*
- 4.1.77 Five of the locations where new risers are proposed are more sensitive to alteration. These are the two risers in rooms adjacent to the northwest corner room; one riser in the eastern-most room on the north wing; and the two risers in rooms adjacent to the southeast corner room. These would require alterations to these rooms, and the loss of elements of original floors, cornices, ceilings, doors and other features and finishes; in six instances (two on the first and fourth floors and one each on the second and second mezzanine floors) an original chimneypiece would require relocation, in others the service risers would be located close to the windows.
- 4.1.78 One of the new risers in the NW corner (that serving the north wing) would be located – on some floors – in ancillary rooms of relatively small dimensions. It would also be located away from the window and its size has been reduced to the minimum necessary. The same is the case for the NE riser. One of the new

risers in the SE corner (that serving the east wing) would be located in an area that has been altered in the past to form WCs or ancillary spaces to the offices.

4.1.79 *These are therefore the most sensitive location for these risers and the harm would be minor.*

4.1.80 The other two new risers in the NW and SE corners of the building would be located in historical rooms (in the west and south wings, respectively). Both would be located along one of the cross walls close to the corridor walls to avoid running across the windows and the size of the risers has been reduced to the minimum necessary.

4.1.81 *These would cause some 'less than substantial' harm at the low end of the spectrum.*

4.1.82 The majority of the horizontal distribution of the services would be concealed behind new raft ceilings, suspended from the concrete soffit of each room. This would necessitate removal of sections of cornice and wall. Where practical, the vast majority of the perimeter corner rooms would reveal the existing ceilings with services distribution via the adjacent spaces or within new joinery units housing floor mounted fan coil units. There would be no horizontal distribution of services in the perimeter corridors.

4.1.83 *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. In the corner rooms, the services would be built into wall-mounted furniture and there would be no rafts.*

4.1.84 Timber glazed fire doors and screens in the perimeter corridors, added in the 1970s, would be replaced by new glazed doors and screens. These generally sit within the same locations and would have a similar architectural language with the interventions elsewhere. The new screens have increased glazing to aid the reading of the vaulted corridor spaces beyond. There would also be a number of new screens that are required to respond to modern fire safety regulations.

4.1.85 *This would be beneficial as the 1970s fire doors and screens 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.*

4.1.86 Historic radiators would be removed from the main offices areas but retained in corridors and corner rooms; if not serviceable, these units would be replaced by radiators removed from the main office areas.

4.1.87 *The removal of the historic radiators would cause minor harm to the significance of the listed building, but this would be in part mitigated by the retention of these units for possible relocation elsewhere on the estate.*

4.1.88 A misting fire protection system is proposed in most rooms, apart from circulation areas and rooms of high significance. Misting heads will be mounted in raft ceilings or side wall mounted where appropriate.



4.1.89 *The misting fire protection system has been sympathetically designed and would not be located in highly sensitive areas, subject to further surveys. 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.*

#### The Proposals for the Basement

4.1.90 Internally, alterations are proposed to the basement to accommodate facilities for staff and plant. The most significant alteration is the localised lowering of the floor levels and the removal of some masonry walls to create room for the plant and service runs. Large items of plant are proposed to be located in the larger spaces in the basement, but there is still a requirement to adapt the basement to accommodate additional plant and the horizontal distribution runs for the services. These works would involve the removal of some structural masonry walls, lowering slabs in some areas and forming trenches in the slab in places, as detailed on the drawings, and creating two lift pits. Piles would also be introduced in a number of areas beneath the reconstructed floors. An original but utilitarian staircase from lower ground floor to the basement would be removed. Some of the below-pavement vaults would be removed or altered.

4.1.91 The opportunity would also be taken to upgrade the thermal performance and to waterproof the basement.

4.1.92 *The proposals for the basement would not cause harm to the significance of the listed building. The proposals would have a considerable magnitude, but the significance of the fabric affected is modest or negligible, lessening the impact on the building*

*overall. These are generally utilitarian spaces and their original purpose was to service the rest of the building. Some of the pavement vaults appear to pre-date the building, but only by a few years and were part of the construction of the now-lost Opera House, and have only modest significance. The introduction of piles beneath new floors would have no impact on the significance of the listed building.*

4.1.93 *Adapting the basement so that it continues in this function is a better option than accommodating plant elsewhere, in more sensitive areas. A sufficient quantity of the original fabric in distinct areas would be unaltered to allow the historic character of the basement to be preserved in part. Elsewhere, the finishes would remain in keeping with this character, being utilitarian and functional.*

4.1.94 Otherwise, there would be isolated removal of original unadorned masonry walls to create spaces for staff facilities, mainly in the centre of the plan.

4.1.95 *These would cause no harm as these are areas of modest significance and the adaptations would be limited to what is necessary to allow the new uses.*

4.1.96 The central oculus would be restored, bringing natural light back into the basement corridor, and reviving the original purpose of the surrounding original basement windows, which was to allow this light to penetrate further into the basement areas.

4.1.97 *This would be beneficial.*

#### The Proposals for the Lower Ground Floor

4.1.98 Many of alterations would affect fabric dating to the 20<sup>th</sup> century. There are, however, also a number of areas where isolated removal of original masonry walls or partitions is proposed to make the spaces work for their new uses. However, nibs and downstands would be retained, where required, to enable the plan form to be legible. An original but utilitarian staircase from lower ground floor to the basement would be removed.

4.1.99 *These would cause no harm as these are areas of modest significance and the adaptations would be limited to what is necessary to allow the new uses.*

4.1.100 An entrance hall to the building is proposed adjacent to the lift core and principal staircase, accessed off the internal courtyard. The height of the space would be increased by the removal of a section of floor between the lower ground and ground floors, which would be similar to the form and size of the oculus opening. The outer wall of the east wing corridor on the ground floor would be removed in this location and a new balustrade with metal stick balusters and a timber handrail would surround the new opening in the floor, overlooking the new entrance hall. The entrance hall would be lined with timber and feature a display case. A new terrazzo floor is proposed for the entrance hall, unless an original hard floor finish is discovered in this location, which would be refurbished.

4.1.101 *This would cause no harm. These are moderately scaled works but they affect fabric of modest or negligible significance. These areas of the interior have been altered in the past, when the new lift cores were inserted in the 1970s, and so this is an appropriate location for the new entrance. The proposals also have the benefit of vastly improving circulation in the building generally and, in particular, step-free access to the internal courtyard, which would*

*allow more people to experience and appreciate this part of the listed building. The proposals would not affect the principal staircase, which would remain in use and intact within its original stairwell.*

4.1.102 An original internal passage in the south wing that connected Commissioners' Yard with the courtyard would be reinstated, which would also reactivate and reinstate the use of the original southern external door. Internally, steps would also be removed and a gentle ramp with handrails introduced to provide step-free access.

4.1.103 *The reinstatement of the original passage and reactivating the original south entrance would be beneficial.*

4.1.104 A new service riser running from lower ground to ground floors would be inserted on the blank, southern end wall of the room in the southwest corner of the building. This would involve removal of the original floor in this area and the riser would abut the original chimneybreast.

4.1.105 *This would cause minor less than substantial harm.*

#### The Proposals for the Ground Floor

4.1.106 The proposals for the ground floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In addition, the proposals are for:

- Alterations to rooms G33 and G34. Here, an original masonry wall and chimneybreast would be removed along with a former WC compartment, accessed off G32. This would make

space for a service riser and an office. The chimneybreast does not contain a chimneypiece.

4.1.107 *This would cause minor 'less than substantial' harm to localised areas only. While original fabric would be removed – plastered masonry walls, dado rail, skirting, the door and architrave, and a chimneybreast – these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Alterations to room G26. An original plaster wall would be removed along with steps to a storage room.

4.1.108 *This would cause minor 'less than substantial' harm to some areas only. While original fabric would be removed, these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- A new service riser running from lower ground to ground floors through room G24. This would be located on the blank, southern end wall of the room and would involve removal of the original floor in this area. Otherwise the original skirting, dado and plaster wall would be affected, being either covered or removed to accommodate the riser.

4.1.109 *This would cause minor 'less than substantial' harm to some areas only. While original fabric would be removed, these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- In room G6, a historic door and architrave would be moved to a new location in the same wall.

4.1.110 *This would cause minor 'less than substantial' harm, mitigated by the reuse of the original door and architrave within the same room.*

- The wall and door at the westernmost end of the north wing corridor would be removed to create a new breakout space. This is not shown on the original drawings, which show a staircase in this location (as indicated by the mullion and transom window in the south wall). It is shown on the 1943 drawings and so is presumed to be either original and relocated here from elsewhere in the building before 1943, or an early-20<sup>th</sup>-century replica of an original door.

4.1.111 *This would be beneficial in that the original mullion and transom window that historically lit a staircase would be returned to the circulation space of the building rather than being obscured in a private room.*

- A new frameless glazed lobby would be provided at the top of the entrance steps in the easternmost part of the south wing. This would replace a 1970s vestibule. The original external doors would be retained.

4.1.112 *This would be beneficial as the existing modern vestibule detracts and is unsympathetic to the character of the corridor spaces. The modern equivalents would be less obtrusive.*

- The modern concrete roof of the single-storey range along the south side of the courtyard would be replaced with a new roof construction with new finishes, suitable to support the use of the rooftop as a terrace.

4.1.113 *This would cause no harm.*

## The Proposals for the First Floor

4.1.114 The proposals for the first floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In particular, two fireplaces would be relocated on this floor. In addition, the proposals are for:

4.1.115 The flight of stairs continuing to the half landing below are contemporary to the 1935-40 link, with grey marble strings and a grey marble capping or handrail.

- Alterations to stairwell 1ST4. Here, the flight of stairs that was erected in 1935-40 as part of the link to the Curtis Green Building would be altered with the removal of one flight and a new floor constructed in its place.

4.1.116 *This would cause minimal harm as this staircase is of limited historic interest and one flight would be retained.*

- Alterations to rooms 108 and 109. Here, an original wall between the two rooms would be removed but the chimneybreast to the south would be retained.

4.1.117 *This would cause minor 'less than substantial' harm. While original fabric would be removed, these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall. The proportions of room 109 have also previously been altered as it originally formed part on the adjacent corridor, further limiting harm.*

- A partition wall in room 126 would be removed, while rooms 126 and 127 would be amalgamated with the removal of the dividing wall but nibs and downstands would be retained.

4.1.118 *The alteration of plan form would cause some limited 'less than substantial' harm but the retention of nibs and downstands would allow the original plan form to remain legible, while the removal of the modern partition would be beneficial.*

- Alterations to rooms 132 and 133. Here, an original wall between the two rooms would be removed along with a door and architrave. A new wall would be inserted, essentially swapping the proportions of the original rooms so that the smaller of the rooms is to the east, rather than the west, as at present. This would make space for a service riser and an office.

4.1.119 *This would cause minor 'less than substantial' harm. While original fabric would be removed, these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall. The original proportions of the rooms would remain and the walls would retain the same relationship to the windows as in the original arrangement, only with one window to 133 and two windows to 132, rather than the other way round.*

- A 'comms' room is proposed in room 135 and a raised gridded floor on beams would be introduced to support the equipment. The south wall, which was erected post 1943, would be partially rebuilt.

4.1.120 *The addition of the floor above the existing would not cause any harm as would be reversible and it would also protect the listed building by adequately supporting the additional weight. The*

*rebuilding of a post-1943 would have no impact on the significance of the listed building.*

- The door at the westernmost end of the north wing corridor would be removed to create a new breakout space. This is not shown on the original drawings, which show a staircase in this location (as indicated by the mullion and transom window in the south wall). It is shown on the 1943 drawings and so is presumed to be either original and relocated here from elsewhere in the building before 1943, or an early-20<sup>th</sup>-century replica of an original door.

4.1.121 *This would be beneficial in that the original mullion and transom window that lit a staircase would be returned to the circulation space of the building rather than being obscured in a private room.*

- A wall at the northernmost end of the west wing corridor would be removed to create a new breakout space. This is shown on the original and 1943 drawings.

4.1.122 *This would cause minor 'less than substantial' harm.*

- An original door and architrave would be moved to a new location in the south wall of room 113.

4.1.123 *This would cause minor 'less than substantial' harm, mitigated by the reuse of the original door and architrave within the same room.*

- The modern glazing in the arched openings to the principal staircase would be replaced.

4.1.124 *This would have no impact on heritage significance.*

- An original door and architrave would be moved to a new location in the east wall of room 104.

4.1.125 *This would cause minor 'less than substantial' harm, mitigated by the reuse of the original door and architrave within the same room.*

#### The Proposals for the Second Floor

4.1.126 The proposals for the second floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In particular, one fireplace would be relocated on this floor. In addition, the proposals are for:

- Rooms 214 and 215 would be amalgamated with the removal of the dividing wall but nibs and downstands would be retained.

4.1.127 *The alteration of plan form would cause some limited 'less than substantial' harm but the retention of nibs and downstands would allow the original plan form to remain legible.*

- Alterations to room 231. Here, 20<sup>th</sup>-century partitions on the northern wall would be removed. This was originally the location of a chimneybreast which has since been removed. No historic fabric is affected.

4.1.128 *This would cause no harm.*

- In room 215 a non-original partition would be removed.

4.1.129 *This would cause no harm.*

- The door at the westernmost end of the south wing corridor would be removed to create a new breakout space. This is not shown on the 1943 plans or the original drawings, so is presumed to be either original and relocated here from elsewhere in the building or a modern replica.

4.1.130 *This would be beneficial in that the original termination of the corridor space with a window would be restored.*

- A wall at the northernmost end of the west wing corridor would be removed to create a new breakout space. This is shown on the original and 1943 drawings.

4.1.131 *This would cause no harm.*

- A c.1970 timber glazed screen with timber glazed door to access the balcony overlooking the southeast staircase would be removed.

4.1.132 *This would be beneficial.*

- An original door and architrave would be moved to a new location in the south wall of room 204.

4.1.133 *This would cause minor 'less than substantial' harm, mitigated by the reuse of the original door and architrave within the same room.*

#### The Proposals for the Second Mezzanine Floor

4.1.134 The proposals for the second mezzanine floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In particular, one fireplace would be relocated on this floor. In addition, the proposals are for:

- Rooms 309 and 310 would be amalgamated with the removal of the dividing wall but nibs and downstands would be retained.

4.1.135 *The alteration of plan form would cause some limited harm but the retention of nibs and downstands would allow the original plan form to remain legible.*

- Removal of the southern wall of the northwest corner room (309). This would make space for a service riser and an office. Nibs of the wall would be retained.

4.1.136 *This would cause minor 'less than substantial' harm. While original fabric would be removed these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Room 313 would be subdivided and a new doorway serving the corridor inserted.

4.1.137 *These proposed changes would not cause harm to the significance of the listed building.*

#### The Proposals for the Fourth Floor

4.1.138 The proposals for the fourth floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In particular, two fireplaces would be relocated on this floor. In addition, the proposals are for:

- Removal of part of the southern wall of the northwest corner room (412). This would make space for a service riser and an office. Nibs of the wall would be retained.

4.1.139 *This would cause minor harm. While original fabric will be removed these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Removal of a door at the northern end of the east corridor. This is not shown on the 1943 plans.

4.1.140 *This would cause no harm.*

- Removal of a partition which subdivides room 420. This is shown on the 1943 plans but is described in the Conservation Management Plan for Norman Shaw North (March 2016, by Feilden + Mawson) as detrimental.

4.1.141 *This would cause no harm.*

- Removal of the wall between rooms 420 and 422. This is original fabric.

4.1.142 *This would cause minor 'less than substantial' harm. While original fabric would be removed these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Removal of a portion of the west wall of room 420 to give access to a storage cupboard. Closing existing access from stairwell.

4.1.143 *This would cause no harm.*

- An original door and architrave would be moved to a new location in the south wall of room 408.

4.1.144 *This would cause minor 'less than substantial' harm, mitigated by the reuse of the original door and architrave within the same room.*

#### The Proposals for the Fifth Floor

4.1.145 The proposals for the fifth floor include those relating to lifts, WCs, tea points, service risers and horizontal distribution networks, and fire doors and screens as discussed above. In addition, the proposals are for:

- Removal of part of the southern wall of the northwest corner room (513). This would make space for a service riser and an office. Nibs of the wall would be retained.

4.1.146 *This would cause minor 'less than substantial' harm. While original fabric would be removed these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Alterations to rooms 511 and 512. Here, an original wall between the two rooms would be partially removed. This would make space for a service riser and an office.

4.1.147 *This would cause minor 'less than substantial' harm. While original fabric will be removed these are standard finishes which are present throughout the building and the loss of small portions of these would not be harmful to the building overall.*

- Removal of a cupboard in the southwest corner of room 524. This is shown on the 1943 plans but its provenance is unclear at present.

4.1.148 *It is not possible to assess this at present.*

- Removal of a two sets of doors in the southernmost section of the east wing corridor. Neither is shown on the 1943 plans.

4.1.149 *This would be beneficial because it restores the original plan form in this area.*

- Removal of the modern extension to the SE staircase, creating a new floor and office at fifth floor level.

*This would be beneficial as it restores the original plan form in this area.*

#### The Proposals for the Sixth Floor

4.1.150 The proposals on the sixth floor affect fabric of low or no significance. The modern partitions would be removed and replaced with new WC and tea point partitions, to a new arrangement.

4.1.151 *This would cause no harm.*

#### The Proposals for the Seventh Floor

4.1.152 The proposals on the seventh floor affect fabric of low or no significance. Generally, the loft spaces would be cleared to make space for plant, including the removal of the floor in the east wing. The roof trusses would not be affected.

4.1.153 *This would cause no harm.*

#### Summary and Conclusion of the Impact of the Proposals

4.1.154 Overall, there are a number of instances where ‘less than substantial’ harm has been identified. In the majority of these,

the harm is minor and the alterations have been kept to the minimum degree necessary to refurbish the building to modern office standards. There are two exceptions where the harm is greater, but still within the ‘less than substantial’ category:

- The introduction of a glazed roof to the courtyard.
- The introduction of new vertical service risers in areas which have not been disturbed historically, resulting in the loss of plan form and finishes and the requirement to relocate six chimneypieces within the building.
- The horizontal distribution of services, principally in a ‘raft’ suspended from the ceiling in the offices.

4.1.155 In the first instance – the introduction of the glazed roof to the courtyard – 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.

4.1.156 In the case of the service risers and horizontal distribution, the proposals are driven by necessity and by the brief. These alterations would equip the building with the mechanical services it requires to meet with current building standards, enabling the building to continue in its original use, as cellular offices; this is also its optimum viable use. The services have been kept to the minimum necessary to achieve the brief. These factors mitigate



the harm the new service risers and horizontal distribution may cause.

4.1.157 A number of instances where the proposals are beneficial to the special interest of the listed building and the character and appearance of the conservation area have also been identified. These are listed in Section 4.3.10 below.

## 4.2 Justification of the Proposals

4.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises Westminster's City Plan (November 2016), Westminster's Unitary Development Plan (January 2007), and the London Plan (March 2021). The draft City Plan 2019-2040 is also a material planning consideration. Decision-makers must also comply with the Planning (Listed Buildings and Conservation Areas) Act requirements.

4.2.2 This section therefore assesses the proposed development first against the City of Westminster's local plan policies, then against the policies of the London Plan, and finally brings to bear heritage policies in the NPPF and the requirements of the 1990 Planning Act.

### Local Plan Policies

4.2.3 Westminster's City Plan (November 2016) includes a policy that relates to heritage. Policy S25 states that Westminster's '*heritage assets will be conserved, including listed buildings, conservation areas...*' Westminster's Unitary Development Plan (January 2007) includes Policy DES 10 that addresses listed buildings and states that applications for development '*should respect the listed building's character and appearance and serve to preserve, restore or complement its features of special architectural or historic interest.*' The draft City Plan 2019-2040 (submitted November 2019) includes Policy 40, which states that '*Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the original*

*building and protecting or, where appropriate, restoring original detail and significant historic fabric.*'

4.2.4 Overall, the building would be conserved in a manner that is appropriate to its significance. Attention has been given to the desirability of preserving the building, its setting and the features of special architectural or historic interest which it possesses, and the proposals would equip this Grade I-listed building for its next phase of life as parliamentary offices. There would be some instances of 'less than substantial' harm to the listed building, but these have been limited to the smallest degree necessary to achieve the benefits of refurbishing the building to the specification required by the brief. This harm would consequently result in some localised non-compliance with Policy S25, Policy DES 10 and Policy 40, as outlined above, as the buildings would not be fully conserved or preserved. However, the conflict with these policies would not be major.

4.2.5 Policy 40 of the draft City Plan 2019-2040 (submitted November 2019) also states that '*Development will preserve or enhance the character and appearance of conservation areas...*' These proposals would enhance the character and appearance of the Whitehall Conservation Area, particularly with the repair of the elevations and the improvements to the north elevation.

### 4.2.6 **London Plan Policies**

4.2.7 Policy HC1 of the London Plan (2021) states that '*(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively*

*managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'*

- 4.2.8 These are positive proposals that would result in the enhancement of the significance of the Grade I-listed Norman Shaw North, which would be appropriately conserved, with some change to significance. The Whitehall Conservation Area would also be enhanced by the proposed works. The proposals would on the whole be sympathetic but there would be some elements of 'less than substantial' harm to the significance of the listed building, which would result in some localised non-compliance with Policy HC1.

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

- 4.2.9 The Act forms the legal basis for decision making where a proposed development will impact listed buildings or a conservation area. For listed buildings it sets out that the decision maker shall have 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' (s. 16 and 66), and for conservation areas, that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that [conservation] area*' (s. 72).
- 4.2.10 These statutory requirements set a high bar for allowing development that would harm heritage assets. However, the statutory requirements must be viewed in light of the relevant heritage policies in the National Planning Policy Framework (NPPF). As noted by the court in *Mordue v Secretary of State for Communities and Local Government* (2015): '*Paragraph 134 of the NPPF appears as part of a fasciculus of paragraphs, set out*

*above, which lay down an approach which corresponds with the duty in section 66(1). Generally, a decision-maker who works through those paragraphs in accordance with their terms will have complied with the section 66(1) duty.'* Although the court was concerned with the previous version of the NPPF and section 66 specifically, the same approach is considered appropriate in respect of the heritage policies in the current NPPF and in respect of the section 16 and 72 duties. It is therefore important to consider the proposed development against the relevant NPPF policies.

#### National Legislation and Policy

- 4.2.11 As set out above, the development partially complies with the heritage policies in the local and regional plan, although any conflict is not considered to be major. However, the National Planning Policy Framework sets out policies on heritage assets which form a material consideration in decision making and should be taken into account. As noted above, these policies are considered to set out a framework for how the relevant statutory duties should be complied with in practice.
- 4.2.12 These policies ask that 'great weight' is given to heritage conservation, and that harm to significance be justified clearly and convincingly, and that it be outweighed by public benefits.
- 4.2.13 Paragraph 193 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 the more important the asset, the greater the weight should be). This is irrespective of*

*whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

- 4.2.14 These are the principles with which the proposals for Norman Shaw North have been developed by BDP. The harms identified above are all necessary to allow the building to transition to its new phase of life as offices with a communal courtyard in the heart of the Northern Estate. Each intervention has been designed to fit as best as is possible within the original character of the building, reusing original features or following original specifications wherever possible, thus mitigating the harm which might arise from the alterations. Restoration of lost features is also proposed in some areas and these would enhance people's ability to appreciate the original design and significance of the building.
- 4.2.15 The National Planning Policy Framework (NPPF) requires the proposals to be assessed as causing either 'substantial' or 'less than substantial' harm. In undertaking this assessment, it is worth remembering the Planning Practice Guidance on substantial harm in paragraph 017. This states:

*In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*

- 4.2.16 No aspect of the proposals has a serious impact on a key element of the building's special interest. The external elevations, the roof, the internal courtyard elevations, the principal staircase, the main corridors and the rooms with surviving historic features such as chimneypieces, cornices, skirting boards, panelling and doors would all be preserved. None of the features identified in Section 1 as having high significance would be harmed by the proposals.
- 4.2.17 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 revitalisation of the courtyard would entail the removal of modern clutter from the courtyard, the repair of the elevations, the restoration of the courtyard oculus, and the new use of the space for a communal purpose which will encourage people to appreciate its significance to a greater degree than at present.
- 4.2.18 The proposals for services, while affecting localised areas to a considerable degree, would not have a significant effect on the overall plan form or features of the building and would only cause 'less than substantial' harm to the listed building. Locating the services in each wing, within the envelope of the external walls of the building, is more sympathetic to its historic character than locating them in a single riser on an external elevation; this is not possible in a building which truly – to Shaw's credit – does not have a single lesser quality or 'rear' elevation. Locating service runs in smaller risers in every room would also cause a greater degree of harm overall. The services have been designed to meet

the brief in as sympathetic a manner as is possible. They would cause 'less than substantial' harm to the significance of the listed building overall.

4.2.19 In summary, the proposals would amount to 'less than substantial harm' to the significance of the listed building, no harm to the setting of the listed building and no harm to the character and appearance of the conservation area nor the setting of other listed buildings.

4.2.20 Within the spectrum which the category of 'less than substantial harm' encompasses, this harm is at the less serious end.

#### Public Benefits

4.2.21 Where a proposal is found to cause 'less than substantial harm' to a listed building, the National Planning Policy Framework states, in paragraph 196:

*Where a development proposal will 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.*

4.2.22 There are a number of instances throughout the proposals where benefits to the fabric of the listed building are accrued. Added to these is the foremost and overarching benefit of revitalising Norman Shaw North, which has not been refurbished for nearly 30 years, and equipping it for its next phase of life as parliamentary offices. This is the optimum viable use for the building and would ensure its conservation and repair in the long term.

4.2.23 Specific 'heritage benefits' include:

- Cleaning and repair of the principal elevations and the roofs;
- Removal of later louvres and rooflights from the roof and replacement with well-designed louvres on the inner-facing slopes;
- Improvements to the north elevation where the single-storey buildings have been removed leaving an unfinished elevation at lower ground floor level, which was never intended to be exposed;
- Reactivating the southeast entrance door on Commissioners' Yard;
- Improvements to the landscaping to the west of the building;
- New interior design which is sympathetic in approach to the historic character of the building, and is to be determined in further detail in later design stages;
- Repair and redecoration/refurbishment of special features internally;
- Removal of 1970s suspended ceilings to reveal original ceiling heights and cornices;
- Removal of carpets to reveal historic floor surfaces, dependant on investigations with details to be determined in further detail in later design stages;
- 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 natural floor finish within the courtyard;
- Improvements to the fenestration and the roof of the single-storey structure within the courtyard;
- Removal of portacabins, bins, bikes, plant and services from the courtyard;
- Creation of a new communal space in the courtyard allowing more people to enjoy and appreciate the historic building;
- Rationalisation of mechanical, electrical and plumbing services, removing unsightly service runs and plant areas and replacing these with better designed modern alternatives;
- Rationalisation of the secondary glazing and replacement with better designed modern alternatives.

4.2.24 In summary, the NPPF requires that the identified elements of ‘less than substantial’ harm must be balanced against a wide range of public and heritage benefits, with the harm being given great weight in that overall balancing exercise, notwithstanding its ‘less than substantial’ nature. Together these benefits weigh more heavily than the harm, meaning that the NPPF policies on heritage, 193, 194 and 196 are satisfied. The conclusion of this balancing exercise is a powerful material consideration that for the purposes of Section 38(6) is considered to weigh in favour of granting planning permission for the proposed development, notwithstanding some non-compliance with heritage policies in the development plan. The grant of planning permission and listed building consent for the proposed development is therefore considered acceptable even following consideration and application of the statutory duties in the 1990 Act.

### 4.3 Conclusion

- 4.3.1 As outlined above, the proposals would provide considerable public benefits, including heritage benefits, by equipping Norman Shaw North for its next phase of life as parliamentary offices.
- 4.3.2 The proposals would cause no harm to the setting of the listed building or to the character and appearance of the conservation area, nor the setting of other listed buildings, all of which would be enhanced.
- 4.3.3 There are some instances of ‘less than substantial’ harm to the listed building, but these have been limited to the smallest degree necessary to achieve the benefits of refurbishing the building to the specification required by the brief. Each instance of harm has been carefully considered and steps have been taken through the design process – and in consultation with Westminster City Council and Historic England – to mitigate the harm by good design, in keeping with the character of the historic building.
- 4.3.4 Overall, the impact of the proposals on the special interest of the listed building would amount to ‘less than substantial’ harm (NPPF para 196). Within the spectrum which the category of ‘less than substantial harm’ encompasses, this harm is at the less serious end.
- 4.3.5 The ‘less than substantial harm’ to the listed building would be outweighed by public benefits, which include works that would benefit the heritage of the building, as well as wider societal benefits.

- 4.3.6 The most important public benefit is that the buildings would be equipped for their continued use as parliamentary offices, which supports their conservation and repair in the long term.
- 4.3.7 Other public benefits include reinstatement of original features, for example the oculus in the courtyard, and providing step-free access to the building. Works to improve the courtyard would also enhance people's ability to appreciate the significance of the listed building.
- 4.3.8 Many of the public benefits, listed in Section 4, would not be possible to deliver without the major improvements that the scheme would provide.
- 4.3.9 The proposals would enhance the significance of the both the Grade I-listed building and the Whitehall Conservation Area and, as such, they would meet the tests for sustainable development outlined within the National Planning Policy Framework (NPPF), insofar as they relate to the historic environment. The many compelling benefits offered by the scheme would easily outweigh the 'less than substantial harm' caused and are, therefore, considered a material consideration which overcomes the presumption against proposals set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Furthermore, the NPPF heritage policies are also a material consideration to overcome the in part non-compliance with the local and regional plans.
- 4.3.10 It is therefore the conclusion of this report that the proposals should be granted planning permission and listed building consent.

## Appendix A - Statutory List Descriptions

### Former New Scotland Yard Norman Shaw North Building

Grade I

Date first listed: 05 February 1970

TQ 3079 NW CITY OF WESTMINSTER VICTORIA EMBANKMENT SW1 92/19  
Former New Scotland Yard 5.2.70 Norman Shaw North Building GV I  
Metropolitan Police old headquarters. 1887-90 by Richard Norman Shaw with R. Dixon Butler. Red brick and Portland stone banding and dressings above granite podium, slate roofs. Flemish and English Baroque details, marking Shaw's transition to his grand manner with a "defensive" note added by the corner tourelles, the granite podium and four-square massing around central court. 4 storeys, basement and 3 tiers of dormers in steep roof. 9 bay wide elevation plus corner tourelles. Entrance by south east corner of south front with large semicircular arched portal in Baroque rusticated surround with engaged rusticated columns and large broken segmental pediment. Plain square headed mullioned- transomed recessed casements to podium. 2nd and 3rd,floors have architraved mullioned-transomed small pane casements with cornices on 1st floor and segmental arched with keystones on 2nd floor, the 2nd floor windows to Embankment with segmental pediments. The tourelles are deeply corbelled as bartizans with finialed cupola domed roofs. Deep corbelled eaves cornice. The north and south fronts are flanked by attic storeys surmounted by distinctive large gables elaborated with broken segmental pediment aedicules and obelisk finials. The Embankment front has blind single storey wings projecting from ground floor and linked by tall cast iron railings screening forecourt. Attached to Embankment elevation is a portrait roundel bronze of Shaw by Hamo Thornycroft. Richard Norman Shaw; Andrew Saint. Listing NGR: TQ3028179813



## **Appendix B - Planning Policy and Guidance**

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

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

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

Similarly, section 72(I) of the above Act states that:

... with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

### **Local Policy**

#### **City of Westminster**

#### **Westminster's Unitary Development Plan (January 2007; partly revised 2010)**

#### **CHAPTER 10 URBAN DESIGN AND CONSERVATION**

#### **POLICY DES 1: PRINCIPLES OF URBAN DESIGN AND CONSERVATION**

##### **(A) Architectural quality, local distinctiveness and sustainability**

Development should:

- 1) be of the highest standards of sustainable and inclusive urban design and architectural quality
- 2) improve the quality of adjacent spaces around or between buildings, showing careful attention to definition, scale, use and surface treatment
- 3) use high quality, durable and, where possible, indigenous and recycled materials appropriate to the building and its setting and should respect and, where necessary, maintain:
  - 4) the character, urban grain, scale and hierarchy of existing buildings and
  - 5) the spaces between them
  - 6) the character, scale and pattern of historic squares, streets, lanes, mews and passageways
  - 7) the form, character and ecological value of parks, gardens and planned open spaces.

##### **(B) Amenity, accessibility and community safety**

To protect amenity, development should:

- 1) adopt appropriate design measures
- 2) provide for safe and convenient access for all
- 3) adopt design measures to reduce the opportunity for crime and anti-social behaviour

4) where proposed, incorporate appropriately designed and positioned security fixtures on buildings and street furniture so as to minimise the visual impact of these fixtures

5) maintain a clear distinction between private and public spaces around buildings and ensure the informal surveillance of public space.

#### (C) Applications

Development proposals should demonstrate how they have taken into account, by use of detailed drawings and a written statement, the following:

- 1) architectural quality, local character and distinctiveness
- 2) the location and nature of existing and potential links to and through the site and to amenities beyond the site
- 3) townscape features within the site and features which border the site
- 4) local views through and within the site and landmark features visible in the vicinity of the site
- 5) accessibility, inclusive design and security measures
- 6) regard to the relevant urban design policies contained in this chapter
- 7) regard to supplementary design guidance produced by the City Council
- 8) waste storage and disposal
- 9) sustainable building principles in accordance with policy ENV 1: Sustainable and resource-efficient buildings.

#### POLICY DES 5: ALTERATIONS AND EXTENSIONS

(A) Permission will generally be granted for development involving the extension or alteration of buildings in the following circumstances:

- 1) where it is confined to the rear of the existing building
- 2) where it does not visually dominate the existing building
- 3) if it is in scale with the existing building and its immediate surroundings
- 4) if its design reflects the style and details of the existing building
- 5) if the use of external materials is consistent with that of the existing building
- 6) where any necessary equipment, plant, pipework, ducting or other apparatus is enclosed within the external building envelope, if reasonably practicable
- 7) where external apparatus such as surveillance equipment is needed it is located so that visual or any other impact on amenity is avoided or minimised.

(B) Permission may be refused for development involving the alteration or extension of buildings in the following circumstances:

- 1) where an extension rises above the penultimate storey of the existing building (excluding roof storeys)
- 2) where it occupies an excessive part of the garden ground or other enclosure
- 3) where any added floorspace is obtained by the roofing over or physical enclosure of basement areas
- 4) where it involves the loss of significant gaps between buildings

5) where it involves the installation of entrance canopies which either obscure or are at variance with the architectural features of the building.

(C) Permission will generally be granted for new shopfronts to retail or similar premises open to the general public, in the following circumstances:

1) where they relate satisfactorily to the design of the upper parts of the building

2) where they would not displace existing shopfronts which are locally distinctive or characteristic

3) where the new shopfront is not designed to be entirely or largely openable, in the absence of local circumstances or established patterns of trading activity

4) where they do not involve the installation of solid or perforated external shutters, except in specially justified circumstances.

#### POLICY DES 6: ROOF LEVEL ALTERATIONS AND EXTENSIONS

(A) Permission may be refused for roof level alterations and extensions to existing buildings (which may include the installation of conservatories, roof terraces, telecommunications equipment or solar collectors) in the following circumstances:

1) where any additional floors, installations or enclosures would adversely affect either the architectural character or unity of a building or group of buildings

2) where buildings are completed compositions or include mansard or other existing forms of roof extension

3) where the existing building's form or profile makes a contribution to the local skyline or was originally designed to be seen in silhouette

4) where the extension would be visually intrusive or unsightly when seen in longer public or private views from ground or upper levels

5) where unusual or historically significant or distinctive roof forms, coverings, constructions or features would be lost by such extensions.

(B) Permission may be granted for new roof structures or additional storeys on existing buildings in the following circumstances:

1) where the proposed development or form of alteration is in sympathy with the existing building's architectural character, storey heights and general elevational proportions

2) where the form and detailing of the extension either repeats or reflects the form, detailing or use of materials found in the existing building

3) where the proposed design accords with (or establishes an acceptable precedent for) similar extensions within the same group of buildings

4) where the design of extension avoids any infringement of the amenity or reasonable visual privacy enjoyed by the occupants of adjacent or nearby buildings.

#### POLICY DES 7: TOWNSCAPE MANAGEMENT

(A) Public artworks

1) The provision of public artwork, including sculpture, statuary and mural decoration, will be encouraged where permission is sought for suitable schemes of development or redevelopment.

2) Such artwork should be a) of a high standard of design and execution, using high quality materials, and

b) spatially related to the development scheme in question and, where fixed to a building, integral to the design of that building.

(B) Street furniture and floodlighting

1) Where the placement of street furniture requires planning permission, it shall be of a suitable standard of design, accord with the patterns of items already in use and generally be sited so as to be visually unobtrusive, having regard to the character and quality of the existing townscape.

2) Where the installation of floodlighting fittings and associated cabling and equipment requires planning permission, it shall be done in a visually discreet manner, having regard to the character of buildings and land on or within which it is to be located.

3) Where such installations are needed for the purposes of development for which permission is sought, they shall be designed to prevent or minimise light pollution or trespass and may be restricted as to maximum hours of operation or levels of illumination, especially in residential areas.

(C) Boundary walls and railings

1) In schemes of development, the loss of boundary walls and railings will be resisted where they form an important feature of and make a positive visual contribution to the street scene

2) Permission will be granted for the addition of boundary walls and railings where

a) they replicate an existing or traditional pattern which is characteristic of the immediate locality

b) they are of a design and employ materials appropriate to the existing or proposed building, in the case of there being no prevalent or traditional pattern in the locality.

(D) Off-street parking and hardstandings

Permission (where required) will not be granted for the formation of hardstandings

1) where they are located in garden ground that is important to the character or appearance of a conservation area or for residential amenity

2) where such development is located in garden ground of importance to the immediate setting of a listed building or a recognisably uniform group of buildings

3) where it would involve the loss of much of the front garden area or any tree of townscape significance or require the demolition of front garden walls or railings.

(E) Paving

The City Council will use suitable paving materials in all areas and will require the sensitive treatment of paving in private schemes to accord with the character of adjacent buildings and surrounding areas.

POLICY DES 9: CONSERVATION AREAS

(A) Applications for outline planning permission in conservation areas.

In the case of outline planning applications within designated conservation areas it may be necessary to require additional details to be

produced in order that the physical impact of the proposed development may be fully assessed.

(B) Planning applications involving demolition in conservation areas

1) Buildings identified as of local architectural, historical or topographical interest in adopted conservation area audits will enjoy a general presumption against demolition

2) Development proposals within conservation areas, involving the demolition of unlisted buildings, may be permitted

a) If the building makes either a negative or insignificant contribution to the character or appearance of the area, and/or

b) If the design quality of the proposed development is considered to result in an enhancement of the conservation area's overall character or appearance, having regard to issues of economic viability, including the viability of retaining and repairing the existing building

3) In any such case, there should also be firm and appropriately detailed proposals for the future viable redevelopment of the application site that have been approved and their implementation assured by planning condition or agreement.

(C) Planning application for alteration or extension of unlisted buildings

Planning permission will be granted for proposals which:

1) Serve to reinstate missing traditional features, such as doors, windows, shopfronts, front porches and other decorative features

2) Use traditional and, where appropriate, reclaimed or recycled building materials

3) Use prevalent facing, roofing and paving materials, having regard to the content of relevant conservation area audits or other adopted supplementary guidance

4) In locally appropriate situations, use modern or other atypical facing materials or detailing or innovative forms of building design and construction

(D) Conservation area audits

The existence, character and contribution to the local scene of buildings or features of architectural, historical or topographical interest, recognised as such in supplementary planning guidance, such as conservation area audits, will be of relevance to the application of policies DES 4 to DES 7, and DES 10.

(E) Changes of use within conservation areas

Permission will only be granted for development, involving a material change of use, which would serve either to preserve or enhance the character and appearance of the conservation area, bearing in mind the detailed viability of the development.

(F) Setting of conservation areas

Development will not be permitted which, although not wholly or partly located within a designated conservation area, might nevertheless have a visibly adverse effect upon the area's recognised special character or appearance, including intrusiveness with respect to any recognised and recorded familiar local views into, out of, within or across the area.

(G) Restrictions on permitted development in conservation areas

1) In order to give additional protection to the character and appearance of conservation areas, directions may be made under article 4(2) of the Town and Country Planning (General Permitted Development) Order 1995. Types of generally permitted development to which such directions may apply will include:

- a) painting, cladding or rendering of building facades
- b) insertion or replacement of doors and windows
- c) removal or replacement of boundary walls and fences
- d) alteration of roof profiles and replacement of roofing materials.

2) Such added powers of planning control may be applied to designated conservation areas the subject of adopted conservation area audits or to buildings or groups of buildings therein identified as being of architectural, historical or topographical interest.

3) The existence of such directions will be taken into account in the authorisation of development that may itself be made subject to the removal of permitted development rights, in appropriate individual cases.

#### POLICY DES 10: LISTED BUILDINGS

##### (A) Applications for planning permission

Applications for development involving the extension or 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.

##### (B) Demolition of listed buildings

1) Development involving the total demolition of a listed building (or any building listed by virtue of being within its curtilage) will only be permitted if, where relevant, the following criteria are met:

- a) it is not possible to continue to use the listed building for its existing, previous or original purpose or function, and b) every effort has been made to continue the present use or to find another economically viable use and obtain planning permission, with or without physical alteration, and
- c) the historic character or appearance of the main building would be restored or improved by the demolition of curtilage building(s), or
- d) substantial benefits to the community would derive from the nature, form and function of the proposed development, and (in all cases)
- e) demolition would not result in the creation of a long-term cleared site to the detriment of adjacent listed buildings

2) If development is authorised in conformity with any of the above criteria, it may be made subject to a condition, agreement or undertaking that any consequential demolition shall not be carried out until all the relevant details of the proposed development have been approved and a contract has been entered into for its subsequent execution.

##### (C) Changes of use of listed buildings

Development involving the change of use of a listed building (and any works of alteration associated with it, including external illumination) may be permitted where it would contribute economically towards the restoration, retention or maintenance of the listed building (or group of buildings) without such development adversely affecting the special

architectural or historic interest of the building (or its setting) or its spatial or structural integrity.

(D) Setting of listed buildings

Planning permission will not be granted where it would adversely affect:

- a) the immediate or wider setting of a listed building, or
- b) recognised and recorded views of a listed building or a group of listed buildings, or
- c) the spatial integrity or historic unity of the curtilage of a listed building.

(E) Theft or removal of architectural items of interest

In order to reduce the risk of theft or removal of architectural items of interest or value from historic buildings during the course of development, the City Council may require additional security arrangements to be made while buildings are empty or during the course of building works.

**POLICY DES 14: STRATEGIC VIEWS**

(A) Viewing Corridor

Permission will normally be refused for developments within the Viewing Corridor where:

- 1) the height of the Development Plane is exceeded by the proposed development and the Strategic Views are interrupted, or
- 2) upon redevelopment, existing tall buildings are not replaced by lower buildings.

(B) Wider Setting and Background Consultation Areas

Permission will only be granted for developments within the Wider Setting and Background Consultation Areas, where:

- 1) the wider setting of the Viewing Corridor is safeguarded
- 2) the background of the view is not interrupted by prominent or visible schemes

**POLICY DES 15: METROPOLITAN AND LOCAL VIEWS**

Permission will not be granted for developments which would have an adverse effect upon important views of

- (A) listed buildings
- (B) landmark buildings
- (C) important groups of buildings
- (D) monuments and statues
- (E) parks, squares and gardens
- (F) the Grand Union and Regent's Canals
- (G) the River Thames.

**Westminster City Plan (November 2017)**

Westminster's City Plan: Strategic Policies was formally adopted by Full Council on 13 November 2013 and re-confirmed in November 2017, and has full weight as part of the development plan in taking planning decisions from that date. This document was the result of a review of the City Council's Core Strategy adopted in January 2011 to ensure

consistency with the Government's National Planning Policy Framework (NPPF), the new London Plan published by the Mayor of London in July 2011, changes to legislation and other updates. It includes the following relevant information:

#### POLICY S25 HERITAGE

Recognising Westminster's wider historic environment, its 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. Historic and other important buildings should be upgraded sensitively, to improve their environmental performance and make them easily accessible.

#### Reasoned Justification

The intrinsic value of Westminster's high quality and significant historic environment is one of its greatest assets. To compete effectively with other major, world-class cities the built environment must be respected and refurbished sensitively in a manner appropriate to its significance. Any change should not detract from the existing qualities of the environment, which makes the city such an attractive and valued location for residents, businesses and visitors.

#### POLICY S26 VIEWS

The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development. Where important views are adversely affected by large scale development in other boroughs, the

council will raise formal objections. Westminster is not generally appropriate for tall buildings.

#### Reasoned Justification

Views of buildings and landscapes are an essential part of Westminster's unique heritage. They can be seriously damaged by insensitive development in the foreground or background. Westminster is very sensitive to impacts from tall buildings within the borough or adjacent boroughs by virtue of the disproportionate impact they can have on important views, the skyline and to Westminster's heritage assets.

Tall buildings are also addressed specifically in relation to Westminster's Opportunity Areas: Paddington Opportunity paragraph 3.14 and Policy S3; Victoria Opportunity Area paragraph 3.19 and Policy S4; Tottenham Court Road Opportunity Area paragraph 3.23. Detailed policy criteria for tall buildings will be included in City Management policy.

#### POLICY S27 BUILDINGS AND USES OF INTERNATIONAL AND NATIONAL IMPORTANCE

Uses of international and/or national importance, and the buildings that accommodate them will be protected throughout Westminster, and new international and nationally important uses encouraged within the Core Central Activities Zone and Opportunity Areas.

#### Reasoned Justification

These uses, and the buildings that accommodate them, contribute to London's world class city status and global competitiveness. Many of these buildings also contribute to Westminster's heritage and are important in attracting visitors to the city, and to the London tourist industry as a whole. New uses of international and/or national



importance in appropriate locations will enhance the role of Westminster in the heart of London.

#### **POLICY S28 DESIGN**

Development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. In the correct context, imaginative modern architecture is encouraged provided that it respects Westminster's heritage and local distinctiveness and enriches its world-class city environment.

Development should:

reduce energy use and emissions that contribute to climate change during the lifecycle of the development; and ensure the reduction, reuse or recycling of resources and materials, including water, waste and aggregates.

This will include providing for an extended life-time of the building itself through excellence in design quality, high quality durable materials, efficient operation, and the provision of high quality floorspace that can adapt to changing circumstances over time.

#### **Reasoned Justification**

Westminster requires a special approach to architecture and urban design in order to deliver the council's spatial vision of creating a world-class, distinctive and sustainable city.

Only the best, exemplary design, which respects and enhances the existing qualities and character of the city will be acceptable.

The NPPF places a requirement on local planning authorities to adopt proactive policies and plans to mitigate and adapt to climate change.

Sustainable design, refurbishment and construction measures provide one of the most effective and efficient ways in which to reduce resource use, greenhouse gas emissions and local pollution, in terms of the materials used and construction techniques employed, as well as throughout the lifetime operation of the development. Furthermore, excellence in design quality and floorspace adaptability will increase the lifetime of the building and enable its reuse by reducing the need for redevelopment. Detailed design criteria will be set out in City Management policy.

#### **Draft Westminster City Plan 2019-2040 (June 2019)**

Relevant draft policy published in the full regulation Westminster City Plan (June 2019) addresses design principles, heritage, townscape and architecture, the public realm and security measures. The Design Principles set out that new design should have regard to its local context, including its character, appearance, materiality and form (policies 39B).

The Heritage policy seeks to protect and conserve the World Heritage Site, listed buildings, conservation areas, and undesignated heritage assets where a balanced judgement allows this (Policy 40). The Townscape and Architecture policy asks that new development is to be sensitively designed, and that special townscape features be conserved, whilst additions and alterations are to be subordinate; strategic and protected views are sought to be enhanced (policy 41). The Public Realm stipulates that this should be safe, attractive and accessible (policy 44). Specific policies on security measures within the public realm (policies 45A-C) require development to provide an integrated approach to the security of sites and associated public or private spaces.

#### **Whitehall Conservation Area Audit (2003)**

The **Whitehall Conservation Area Audit** was published in 2003 and describes the character of the area as follows:

*3.1 Whitehall Conservation Area in the heart of London lies on part of the site of Saxon Lundenwic and contains the only surviving building of Whitehall Palace, Inigo Jones's Banqueting House. Rich in archaeology, surviving medieval remains can be found below ground or incorporated in later buildings. The area today is of international renown, the ceremonial route along Whitehall linking Trafalgar Square and the Palace of Westminster and Westminster Abbey World Heritage Site. Throughout the area there are listed buildings of national importance from the 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> centuries which continue to play a key role in the history of Britain.*

*3.2 The buildings in the southernmost part of the conservation area are located within the Palace of Westminster and Westminster Abbey World Heritage Site character area buffer zone, the north boundary of which is defined by King Charles Street and Derby Gate. The New Government Offices and Portcullis House form the backdrop to Parliament Square and New Palace Yard respectively, and are important in the setting of the Palace of Westminster and Westminster Abbey. The development along the east side of Parliament Street is also important, forming the foreground in views along Whitehall.*

*3.3 Whilst Whitehall, a grand and impressive processional route with strong solid built frontages forms the core of the conservation area, there are two other distinct elements of equal importance and collectively they provide some of the most important and well known views in London. To the west is Horse Guards Parade with its exceptional built edge, the impressive*

*courtyard continuing the openness of St James's into the conservation area. To the east is Bazalgette's Victoria Embankment over the north low level sewer with a strong urban edge and formal garden setting, and the river Thames corridor providing important views towards the Palace of Westminster to the south and City of London to the north. Victoria Embankment provides a key green space in the otherwise built up area, and an important pedestrian and vehicular route along the Thames. Below the Embankment the District Line, one of London's earliest underground lines follows the course of the road. The river generates much activity in this part of the Conservation Area with Westminster Pier providing boat trips to Greenwich*

*3.15 The majority of the buildings in the conservation area are listed, most Grade I or II\*, providing a built fabric of exceptional quality and international significance. There are a variety of building types reflecting the development of the area through the ages from the site of a Royal Palace to an area with a high concentration of Government buildings. Whilst there is a varied scale and style of development throughout the area, traditional proportions and rhythms dominate with regular fenestration patterns. This provides an overall solidity and harmony and allows for the natural expression of grandness of some schemes through the hierarchy and proportions of floor levels.*

#### **Royal, Military and Police buildings**

*3.32 The former New Scotland Yard buildings (The Metropolitan Police old Headquarters), 1887-90 by Norman Shaw with Dixon Butler and the later extension designed 1896-98 (built 1904-06) have Flemish and English Baroque details. Built in red brick with Portland stone banding and window details they have finely*

*articulated roofs with elaborate large gables domed roofed  
torelles, and lofty banded chimney stacks. To the north is  
Embankment Police Station, 1935-40 by W Curtis Green. A stone  
fronted neo-classical building which retains its original windows it  
has a symmetrical composition to the river front.*

## **The London Plan**

In March 2021, the Mayor published (i.e. adopted) the London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

### **Policy HC1 Heritage Conservation and Growth**

*(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

## **National Planning Policy Framework**

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (February 2019). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

- *190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.*

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:

*a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

*b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*c) the desirability of new development making a positive contribution to local character and distinctiveness.*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 193 the framework states the following:

*...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

The Framework goes on to state at paragraph 194 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.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 195 of the NPPF states that:

*...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*a) the nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

*196. Where a development proposal will 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.*

In terms of non-designated heritage assets, the NPPF states:

*197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balance judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

The Framework requires local planning authorities to 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. Paragraph 200 states that:

*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.*

Concerning conservation areas and world heritage sites it states, in paragraph 201, that:

*Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

### **National Planning Practice Guidance**

The National Planning Practice Guidance (NPPG) was published on the 23<sup>rd</sup> July 2019 to support the National Planning Policy Framework (NPPF) 2019 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to

require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset’s significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is “significance”?

‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations

because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to

describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 15: What is a viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed

ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 193-196 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and

therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor

works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that 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 the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 194).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:



- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

#### **Other Relevant Policy Documents**

**Historic England: Historic Environment Good Practice Advice in Planning (March 2015)**

**Historic England: Conservation Principles and Assessment (2008)**

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## Appendix D - Endnotes

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<sup>i</sup> Girouard, 1977, p. 224-5.

<sup>ii</sup> *Whitehall Conservation Area Audit*, 2003, p. 8.

<sup>iii</sup> Whitehall Conservation Area Audit, 2003, p. 13.

<sup>iv</sup> Beattie, 1972, p. 69.

<sup>v</sup> Beattie, 1972, p. 68.

<sup>vi</sup> Saint, 2010, p. 291.

<sup>vii</sup> Crawford, 1979, p. 44.

<sup>viii</sup> Beattie, 1972, p. 70.

<sup>ix</sup> Saint, 2010, p. 291.

<sup>x</sup> Saint, 2010, p. 292.

<sup>xi</sup> Saint, 2010, p. 293.

<sup>xii</sup> Saint, 2010, p. 294.

<sup>xiii</sup> *ibid*

<sup>xiv</sup> *ibid*

<sup>xv</sup> *The Builder*, 1890, p. 232.

<sup>xvi</sup> Beattie, 1972, p. 72.

<sup>xvii</sup> Beattie, 1972, p. 74.

<sup>xviii</sup> *The Builder*, 1890.

<sup>xix</sup> Beattie, 1972, p. 80.

<sup>xx</sup> *Daily Express*, 15 September 1926.

<sup>xxi</sup> *Proposed extension of New Scotland Yard*, National Archives ref. no. WORK 12/264.

<sup>xxii</sup> Pond, 1981, p. 3.

<sup>xxiii</sup> Allen, 2018.

<sup>xxiv</sup> House of Commons Information Office, 2004.

<sup>xxv</sup> *Architects' Journal*, January 1975, p. 178-179.

<sup>xxvi</sup> Crawford, 1979, p. 45.

<sup>xxvii</sup> House of Commons Information Office, 2004.

<sup>xxviii</sup> Saint, 1976.

<sup>xxix</sup> *ibid*

<sup>xxx</sup> *RIBA Journal*, 1901, p. 101.

<sup>xxx</sup> Brodie, 2001, p. 315.