

MILLBANK FLOOD
ALLEVIATION
HERITAGE IMPACT
ASSESSMENT
ISSUE 01
MARCH 2021



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MILLBANK FLOOD ALLEVIATION: HERITAGE IMPACT ASSESSMENT

CONTENTS

1.0 INTRODUCTION	04	3.0 DESCRIPTIONS	10
1.1 Introduction	04	3.1 Basements and the Areas for Proposed Works	10
1.2 Location and Context	04		
<hr/>		<hr/>	
2.0 LEGISLATIVE CONTEXT	05	4.0 HISTORICAL DEVELOPMENT	18
2.1 Legislation - Planning (Listed Buildings and Conservation Areas) Acts 1990	05	4.1 Summary History of Millbank Island	18
2.2 The National Planning Policy Framework (Updated 2019)	05	4.2 Historic Development of the Basement and the Areas for Proposed Development	20
2.3 The National Planning Practice Guidance	07		
2.4 English Heritage, Conservation Principles, 2008	07	5.0 ASSESSMENT OF SIGNIFICANCE	24
2.5 Historic England, Good Practice Advice in Planning Note 2 - Managing Significance in Decision-Taking in the Historic Environment, 2015	07	5.1 Levels of Significance	24
2.6 Historic England, Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets, 2015	07	5.2 Assessment	24
2.7 The London Plan, March 2016, with Consolidated Alterations Since 2011	07		
2.8 Local Planning Policy	08	6.0 IMPACT ASSESSMENT	27
2.9 Strategic Estates Conservation Policy	08	6.1 Proposals	27
2.10 Westminster Local Heritage Site	09	6.2 Assessment Methodology	27
		6.3 Impact Assessment Criteria	28
		6.4 Impact Assessment	29
		6.5 Summary	32

SECTION 1.0

INTRODUCTION

1.1 INTRODUCTION

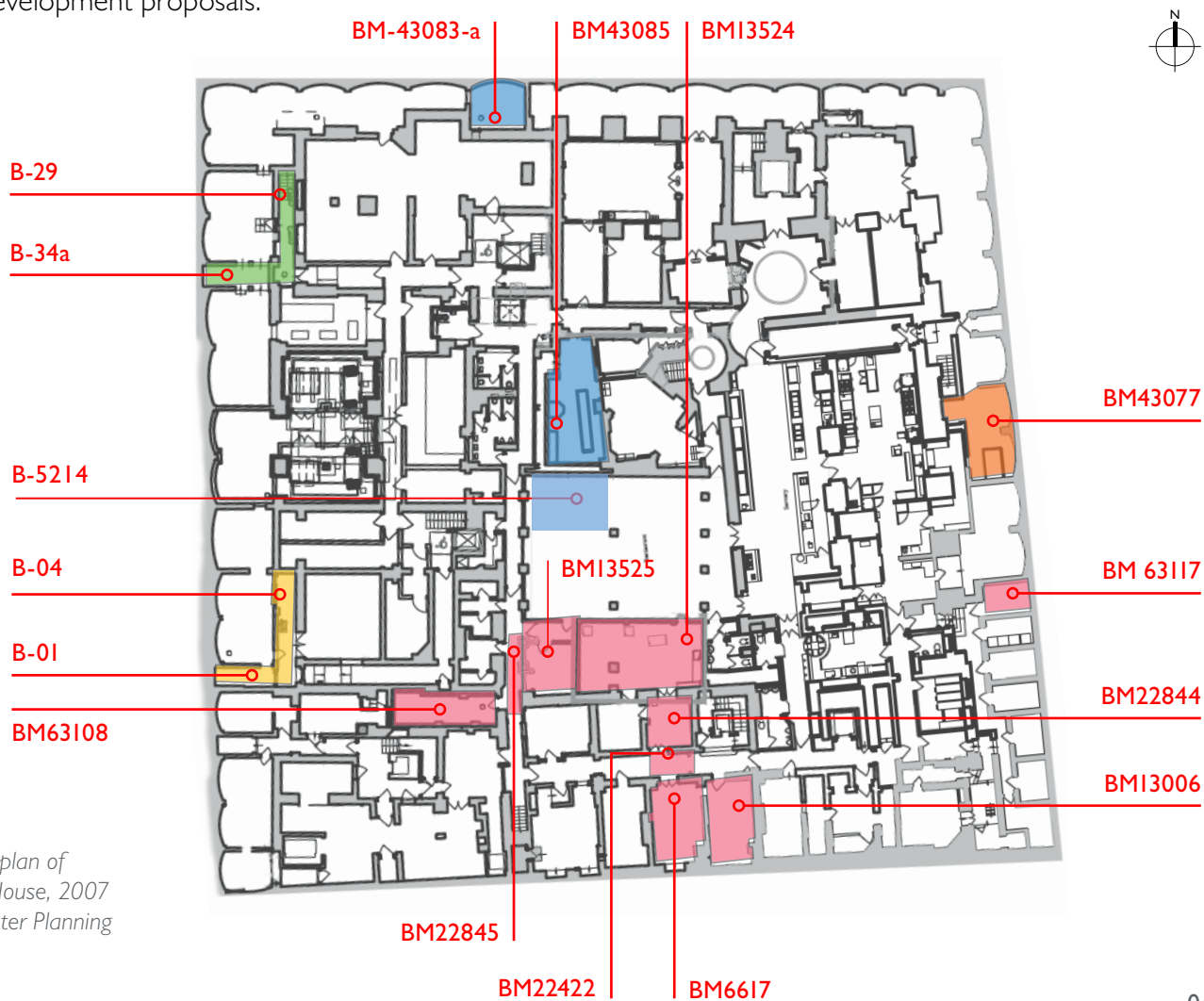
This heritage impact assessment has been prepared by Purcell on behalf of the House of Commons, the Applicant for this Listed Building Application, in support of proposals relating to flood alleviation in the basement of Millbank House. The report should be read alongside the Design and Access Statement and the proposed drawings by Purcell.

A summary of relevant legislation, national, regional and local planning policy and guidance is provided in Section 2. A description of the areas affected by the proposed works follows in Section 3. Section 4 provides a brief history of Millbank Island before focusing on the development of the basement areas for the proposed works. Section 5 assesses the heritage significance of the site and its setting. Finally, Section 6 provides a brief description of the proposals and assesses the potential heritage impact of the development proposals.

1.2 LOCATION AND CONTEXT

Millbank Island is large quadrangular building covering a gross external area (GEA) of approximately 2440 sq m bounded to the north by Great College Street, to the east by Millbank, to the south by Great Peter Street and to the west by Little College Street. It is located within the City of Westminster, forming part of the Smith Square Conservation Area and is within the setting of the Westminster World Heritage Site.

The sites for proposed change, which form part of the five existing individual below ground drainage systems, are located across the basement floor. The spaces function as vault storage spaces, plant rooms, internal stores and lightwells.



Basement plan of Millbank House, 2007 (Westminster Planning Portal)

SECTION 2.0

LEGISLATIVE CONTEXT

2.1 LEGISLATION – PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

2.1.1 HERITAGE DESIGNATIONS

When considering whether to grant planning permission for development which affects a listed building or its setting, Section 66 of the Act requires local planning authorities to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72(1) of the principal Act requires decision makers with respect to any building or land within a conservation area to pay special attention to the desirability of preserving or enhancing the character and appearance of that area.

Millbank Island is a Grade II* listed building, it is surrounded by other listed buildings both in the immediate setting on Little College Street and in the wider setting around the abbey and palace. It is located within the Smiths Square Conservation Area, sited opposite the listed Victoria Tower Gardens and overlooks the southern edge of the Westminster World Heritage Site.

2.2 THE NATIONAL PLANNING POLICY FRAMEWORK (UPDATED 2019)

The *National Planning Policy Framework* (NPPF) establishes the government's planning policies for new development within England and how these are expected to be applied. 'At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking'. The sections most relevant here are outlined below:

Section 12 – Achieving well-designed places (formerly Section 7 – Requiring Good Design)

Paragraph 124: The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

LEGISLATIVE CONTEXT

Paragraph 127: Planning policies and decisions should ensure that developments:

- a will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

Section 16 – Conserving and Enhancing the Historic Environment (formerly Section 12)

Paragraph 189: Requires that the significance of any heritage assets affected by development proposals, including any contribution made by their settings, should be described by an applicant. The level of detail should be proportionate to an asset's importance.

Paragraph 190: Local planning authority to identify and assess the significance of heritage assets affected, including by development affecting the setting of a heritage asset.

Paragraph 193: 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 any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 195: Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total 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 not for profit, 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.*

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.

2.3 THE NATIONAL PLANNING PRACTICE GUIDANCE

On March 6th 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance website which includes the section 'Conserving and enhancing the historic environment'. The guidance is a live document intended to provide further detailed information about the implementation of the NPPF.

2.4 ENGLISH HERITAGE, CONSERVATION PRINCIPLES, 2008

The Principles, Policies and Guidance for the sustainable management of the historic environment were produced to strengthen the credibility and consistency of decisions taken and advice given by Historic England staff (formerly English Heritage). The guidance is intended to be read by local authorities, property owners, developers and professional advisers and is fully aligned with the NPPF and many Local Plans refer to it as important policy.

2.5 HISTORIC ENGLAND, GOOD PRACTICE ADVICE IN PLANNING NOTE 2 – MANAGING SIGNIFICANCE IN DECISION-TAKING IN THE HISTORIC ENVIRONMENT, 2015

The purpose of this note is to provide information on good practice to assist local planning authorities, consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and the related guidance contained within the National Planning Practice Guidance.

2.6 HISTORIC ENGLAND, GOOD PRACTICE ADVICE IN PLANNING NOTE 3 – THE SETTING OF HERITAGE ASSETS, 2015

This note provides guidance on managing change within the settings of heritage assets and supersedes 'The Setting of Heritage Assets', English Heritage, 2011

2.7 THE LONDON PLAN, MARCH 2016, WITH CONSOLIDATED ALTERATIONS SINCE 2011

The London Plan is the overarching strategic plan for London over the next 20-25 years. Strategic planning in London is shared between the Mayor of London, the 32 London boroughs and the City of London. Local borough documents are generally aligned with the London Plan which must be taken into account in planning decisions in any part of London. London Plan Chapter Seven concerns London's living spaces and places. The following policies relate to the historic built environment specifically:

- Policy 7.4: Local Character
- Policy 7.8: Heritage Assets and Archaeology
- Policy 7.10 World Heritage Sites
- Policy 7.11 London View Management Framework
- Policy 7.12 Implementing the London View Management Framework

2.8 LOCAL PLANNING POLICY

The Westminster City Plan was formerly adopted on the 9th November 2016. It provides the vision, objectives, spatial policies and detailed policies to guide borough development up to and beyond 2026/27 as is aligned with the NPPF. City Plan Part 5 concerns Westminster's built heritage and archaeology. The following policies are the most relevant to the historic built environment of Westminster:

- Policy S25: Heritage
- Policy S26: Views

2.9 STRATEGIC ESTATES CONSERVATION POLICY

Strategic Estates, Houses of Parliament has also formed its own Conservation Policy Statement which covers all the historic buildings under its authority.

'Parliament has important stewardship responsibilities for the care, conservation and maintenance of the Palace of Westminster (part of the Westminster World Heritage Site) and historic buildings on the Parliamentary estate, with important Grade I, Grade II and Grade II listed buildings of special architectural and historic interest. In exercising its stewardship function the Strategic Estates, Houses of Parliament will strive for exemplary standards reflecting the unique historical, architectural and archaeological importance of the sites.*

Conservation, maintenance and adaptation works will derive from sound research of the original designs, materials, techniques and workmanship. Subject to the requirements of Parliament, works staff will seek advice and consult appropriately on matters of presentation or when important decisions are required on conservation issues. There will be a full consultation with Historic England and Westminster City Council and close working relationships with archives including the Parliamentary Archives.

LEGISLATIVE CONTEXT

Staff will be encouraged to develop knowledge of the history, architecture and conservation of the buildings, and use of appropriate materials and techniques. Regular cyclical inspections will be undertaken of the structure, fabric and services which will inform a long term rolling programme of conservation and maintenance. This programme will include measures to protect and care for the fabric including fire precautions and cleaning. The basis of day to day minor maintenance will be timely repair using appropriate materials and techniques with exemplary standards of workmanship and quality assurance.

To fulfil these responsibilities the two Houses will employ appropriately trained and experienced specialists and will seek financial allocations for conservation and maintenance according to the needs of the buildings. The consultants and contractors employed will be drawn from select lists of those who can demonstrate the required standards of knowledge, experience and skill. Where there is a possibility of finding archaeological remains, expert advice will be sought and work will proceed with due caution.'

2.10 WESTMINSTER LOCAL HERITAGE SITE

Millbank Island is located adjacent to the Westminster World Heritage Site (WHS) which was inscribed by the World Heritage Committee of UNESCO as a cultural World Heritage Site in 1987. The WHS description reads 'Westminster Palace, rebuilt from the year 1840 on the site of important medieval remains, is a fine example of neo-Gothic architecture. The site – which also comprises the small medieval Church of Saint Margaret, built in Perpendicular Gothic style, and Westminster Abbey, where all the sovereigns since the 11th century have been crowned – is of great historic and symbolic significance'.

The WHS contains The Palace of Westminster, Westminster Abbey and St Margaret's Church and is bounded to the north by Bridge Street and Westminster Bridge, to the east by the River Thames, to the west by Broad Sanctuary and Great Smith Street and to the south by Great College Street. The Westminster World Heritage Site Management Plan was published in 2007. It provides an understanding of the World Heritage Site, identifies key features, characteristics, elements of the area and defines its Outstanding Universal Value (OUV), identifies issues which affect the site, enables an holistic view with regard the challenges and opportunities it faces and establishes a set of principles to enable the site to be managed and sustained for future generations.

The WHS has no buffer zone but Millbank Island is within its setting and several listed structures contained within its boundary. The Management Plan identifies it as forming part of the Barton Street/ Cowley Street Character Area.

SECTION 3.0

DESCRIPTIONS

3.1 BASEMENT AND THE AREAS FOR PROPOSED WORKS

The single-level basement is constructed on mass concrete strip footings; very few historic or decorative architectural features exist except for original wall fabric and original supporting piers. The character of the basement is largely utilitarian owing to its plant, storage and service function.

The areas for the proposed works are the five existing individual below ground drainage systems that serve the basement of Millbank House. These areas, which are divided into five coloured zones for the proposals, are located within external storage spaces, lightwells, internal stores and plant rooms.

Yellow Zone (B-01 & B-04)

B-01 is a vaulted space beneath Little College Street on the west side of Millbank House, accessed from street level via a ladder in lightwell B-04. B-01 is not accessible with both openings to B-02 and B-04 infilled, however, it is possible to make out the general appearance of the room through the louvred window from B-04. The vault space features brick walls, a concrete floor and contains insulated pipework. The lightwell, B-04, accessed from Little College Street, features white glazed brick wall cladding and a concrete floor, as well as the same insulated pipes as B-01.



View through the louvred window into B-01 showing brick walls



Concrete flooring at the south end of B-04 showing an existing drain and insulated pipework entering B-01

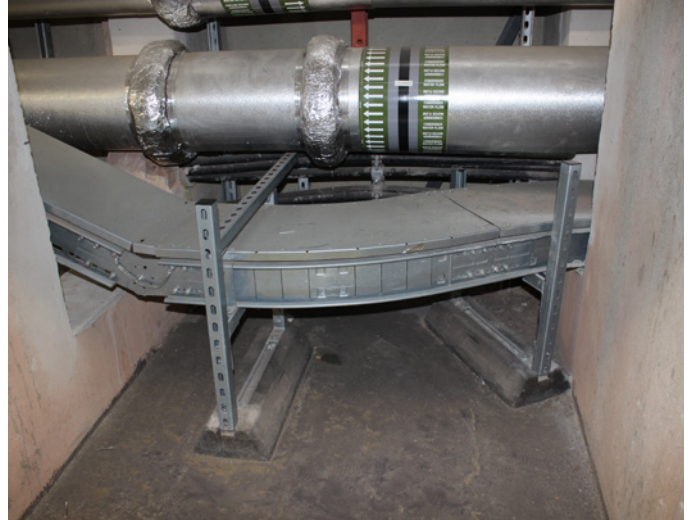


View looking south along the lightwell (B-04)

DESCRIPTIONS

Green Zone (B-34a & B-29)

B-34a is a vaulted space beneath Little College Street on the west side of Millbank House. The space is not directly accessible from the lightwell perpendicular, B-29, owing to an infilled opening, but instead via B-34. B-34a forms part of a sequence of largely open plan basement vault spaces, separated from adjacent vaults by wall nibs and structural columns. The floor finish is concrete with epoxy paint and the room contains a pump as well as insulated pipework and services running in covered cable trays across the series of vault spaces. The lightwell, B-29, serving B-34 directly and B-34a indirectly is served by an external stair off Little College Street and features white glazed brick wall cladding, a concrete floor and a number of modern service and pipework interventions.



Pipework and cable trays in B-34a



View looking south across B-34a showing the pump on the left



Concrete flooring at the south end of lightwell (B-29) and infilled opening between B-29 and B-34a



View looking south along the lightwell (B-29)

DESCRIPTIONS

Pink Zone (BM 63117, BM 13006, BM 6617, BM 22422, BM 22844, BM 13524, BMI3525, BM 22845 & BM 63108)

The rooms making up the Pink Zone are largely located to the south-west of the building, except BM 63117, which is located to the east, on the Millbank side.

Most of the rooms serve as internal stores, maintenance rooms, corridors or changing rooms (except BM 63108 and BM 63117, which are discussed overleaf). The wall fabric around these rooms is largely original, however, the spaces feature no visible historic or decorative architectural features and are characterised by modern carpet tiles or tiled floors, suspended ceilings with integrated LED panels or strip lights, modern doors and architraves. The walls and ceilings feature plastic trunking for cable routing, metal cable trays, insulated pipework and plant equipment. Certain rooms feature manhole covers in their flooring.



View looking north across BM 13006



Modern tiled flooring in BM 13006 showing an existing manhole cover



View looking north in BM 6617 showing the suspended ceiling

DESCRIPTIONS



Suspended ceiling in corridor BM 22422



Suspended ceiling in BM 22844



Suspended ceiling in BM 13524



Suspended ceiling in BM 13525



Existing manhole cover in BM13525



Suspended ceiling in corridor BM 22845

DESCRIPTIONS

BM 63108, is an external 'area'/ lightwell featuring concrete flooring and white glazed bricks with modern metal supports for plant and services. The area is damp and features pigeon guano and other detritus, as well as cluttered pipework, cable trays and service boxes.



View looking west across BM 63108 showing a concrete floor, metal supports, pipework and service boxes



Floor showing surface water, dirt and pigeon guano

BM 63117 is an external store beneath Millbank with a timber two-part panelled door, brick walls and a concrete floor. The concrete ceiling has supporting steel beams and exposed brick walls. The room has been exposed to water ingress, as indicated by the damp concrete and the corrosion of steel beams in places. The lightwell serving the space, BM 22850 comprises the eastern masonry walls to Millbank House and the lightwell wall to the east, clad in white glazed bricks. The walls feature cable trays with serving wiring and pipework, particularly at the upper levels, and above the lightwell at street level, are metal security grilles.



View looking east in BM 63117



Timber-panelled door to BM 63117

DESCRIPTIONS



Concrete floor in BM 63117 showing existing manhole cover



Corrosion of steel beams (expansion, lamination) in BM 63117 owing to water ingress



Lightwell (BM 22850) serving BM 63117 showing white glazed bricks and two-part panelled door



Cable trays with service wiring in the lightwell (BM 22850)



View looking into the lightwell from street level on Millbank

DESCRIPTIONS

Orange Zone (BM 43077 & BM 33113)

BM 43077 is a large space comprising two interlinked vaults beneath Millbank with concrete floor, wall and ceiling finishes. The ceiling features cable trays for services and, in places, signs of water ingress including corrosion of steel beams. The lightwell, BM 33113, is accessed by a metal staircase from Millbank and comprises concrete flooring and white glazed bricks. The walls are lined with cable trays and pipework and security grilles exist above the lightwell.



View looking north along the vault space in BM 43077



Corrosion of steel beams (expansion, lamination) owing to water ingress in BM 43077



View looking into the lightwell (BM 33113) from street level on Millbank



Cable trays and services interrupting wall fabric in BM 33113



View looking south towards the staircase in the lightwell (BM 33113)

DESCRIPTIONS

Blue Zone (BM 43083-a, BM 43085 & BM 5214)

The blue zone comprises an external vaulted space on the north side of Millbank House beneath Great College Street, which has brick and concrete walls, concrete floors and metal security grilles above the space at street level. The walls feature a number of cable trays with services, vents and louvred openings. BM 43085, which lies to the south, is a Boiler room with brick walls painted white, concrete flooring, plant and associated insulated pipework and service cupboards.

A modern fit out Restaurant occupies space 5214 which is south of Boiler Room 43085.



View looking into the lightwell (BM 34083-A) from street level on Great College Street



View looking east in BM 34083-A



View looking north in BM 43085



Concrete flooring in BM 34083-A



Looking north west in modern fit-out Restaurant in BM 5214

SECTION 4.0

HISTORICAL DEVELOPMENT

4.1 SUMMARY HISTORY OF MILLBANK ISLAND

In the late 19th century the Ecclesiastical Commissioners were based in two town houses at nos. 10 and 11 Whitehall Place. The leases were due to expire in 1918 and it was decided that new purpose-built offices should be erected on the new plot formed out of the recent Millbank improvement works. The architect appointed for the new offices was William Douglas Caroë (1857-1938). Caroë was an influential architect of the Edwardian period with one of the largest practices in the country for its time. In 1881 he entered the office of the renowned church architect J. L. Pearson which led to his appointment in 1885 as an architect to the Ecclesiastical Commissioners.

4.1.1 General Layout and Construction

The new office building was designed to operate as five individual properties separated by party walls around a four-sided block with a large lightwell at its centre. The original plans, reproduced in Appendix B, show how Caroë arranged the building internally with Commissioner's offices along the Millbank, Great College Street and Little College Street ranges and the Country Surveyors, Solicitors, London Surveyors and Architects occupying the south range along Great Peter Street. Caroë and his partner Herbert Passmore moved from 8a Whitehall Place with the Commissioners along with their surveyors Cluttons from nos. 8 & 9 and Smiths, Gore, Ingram and Norton from no. 14 to occupy nos. 3 & 5 Great College Street and no. 7 Little College Street respectively. The Commissioner's solicitors Miles, Jennings, White and Foster also moved from no. 8 Whitehall where they had been since 1864, to no. 5 Little College Street. The company initials of these various occupants can be seen carved in relief on the large chimney stacks above Millbank Island.⁰¹

Construction of the foundations and basement began in 1903 by the builders George Trollope and Sons with the superstructure erected by Messrs. Johnson and Sons of Leicester.⁰² The building was constructed around a steel frame with load bearing masonry walls and floors and roofs of filler joist construction (steelwork embedded in clinker concrete). It had a total floor of 142,000 sq. ft and cost just over £180,000.⁰³

4.1.2 Exteriors

Millbank Island was designed in an exuberant, eclectic style typical of the Edwardian period drawing heavily upon Renaissance Plateresque and Franco-Flemish motifs. For the principal Millbank elevation Caroë designed a rather plain central section of six bays constructed in red brick with stone dressings but exaggerated the corners with chimneys, projecting bowed oriels, shaped gables and pyramidal roofed towers. The Great College Street was executed in similarly flamboyant fashion, despite being on a secondary street, obscured by the (since demolished) terraced housing on present Abingdon Street Gardens. Towards the rear of the block, Caroë scaled the building down to key in with the domestically scaled properties along Great Peter Street and Little College Street.

⁰¹ Hicks, S. *Around 1 Millbank – A History of the Area* (2006) p.23

⁰² *The Builder*, April 30th 1904, p. 468

⁰³ Hicks, S. *Around 1 Millbank – A History of the Area* (2006) p.22

HISTORICAL DEVELOPMENT

4.1.3 Interiors

Caroë designed the internal layout around a series of plain, cell-like staff offices and far grander reception rooms and board members offices strung out either side of a central spine corridor. The grander spaces were located at first floor level towards the east front with views over Millbank, the River Thames and the Palace of Westminster and within the main entrance hall and principal stairs. Here he faced the hall and stair balustrading in black polyphant stone with a large galleried lightwell overhead, rising almost the full height of the building. The first floor board room was clad in oak wainscoting and the first floor corner office richly decorated with deeply moulded cornicing, enriched friezes, plaster moulded wall panelling and elaborate over-sized fire surrounds. Caroës own family flat at fifth floor level received similar attention and was finished in oak panelling with a galleried library reached by a spiral staircase.

4.1.4 Alterations

There are very few recorded alterations between 1903 and the 1980s. The first major recorded change was in the late 1980s when the Commissioners erected the particularly intrusive single storey building within the central courtyard to provide additional office space. The structure was formed in two halves, with the southern part consisting of a steel frame supporting reinforced concrete slabs on piled foundations and the northern half a steel framed structure supporting reinforced concrete slabs partly supported on the existing building and new foundations. Other associated works included two new chillers at roof level, involving modifications to one of the roof pitches to accommodate the chiller within the footprint of the roof space.⁰⁴

In the early 20th century, the WCs within the circular stair tower were overhauled and the old lift shaft was replaced with a new shaft. In 2002, the Parliamentary Estate acquired Little College Street, which was refurbished for the Lords' offices. Millbank House was acquired in 2006 for £65 million to provide additional office space. A refurbishment programme of the unleased areas was undertaken from 2007 to 2011 to provide office accommodation for over 100 Members of the House of Lords and their staff, including meeting rooms, kitchens and dining facilities, a mail room, a reading room and an e-library. 2007 and 2008 saw major programmes of internal and external alterations and repairs.

Planning permission and listed building consent was granted in May 2014 for the demolition of the modern courtyard infill building and associated repairs to the internal courtyard elevations and landscaping at no. 5 Great College Street (14/12589/ FULL and 14/12590/LBC). Further works were consented in February 2016 for a major refurbishment of the offices in no. 5 Great College Street (15/07481/FULL & 15/07482/LBC). The external works included a six storey glazed link and a single storey glazed courtyard walkway. Internal alterations were carried out at all floor levels including the stripping out of modern partitions, suspended ceilings, floor and wall finishes and doors and door frames and new mechanical plant was housed in the basement and at roof level.

⁰⁴ Palace of Westminster, Millbank House Phase III Major Refurbishment, Structural Report for Outline Business Case 2014, Alan Baxter, p.5

HISTORICAL DEVELOPMENT

4.2 HISTORIC DEVELOPMENT OF THE BASEMENT AND THE AREAS FOR PROPOSED DEVELOPMENT

The builders George Trollope and Sons began the construction of the foundations and basement in 1903. Whilst the other floors were separated into offices of various configurations, the basement largely housed strong rooms and other storage areas.

The 1903 plan shows the Yellow Zone (B-01 and B-04) and Green Zone (B-34a and B-29) in a similar configuration to present; these spaces comprised vaulted spaces underneath the pavement of Little George Street with lightwells or 'areas' perpendicular containing staircases accessing the vaults from street level. The original staircase to B-04 has since been lost. The lightwells provided openings to both the vault spaces, B-01 and B-34a, and, on the opposite side, the basement of Millbank House.

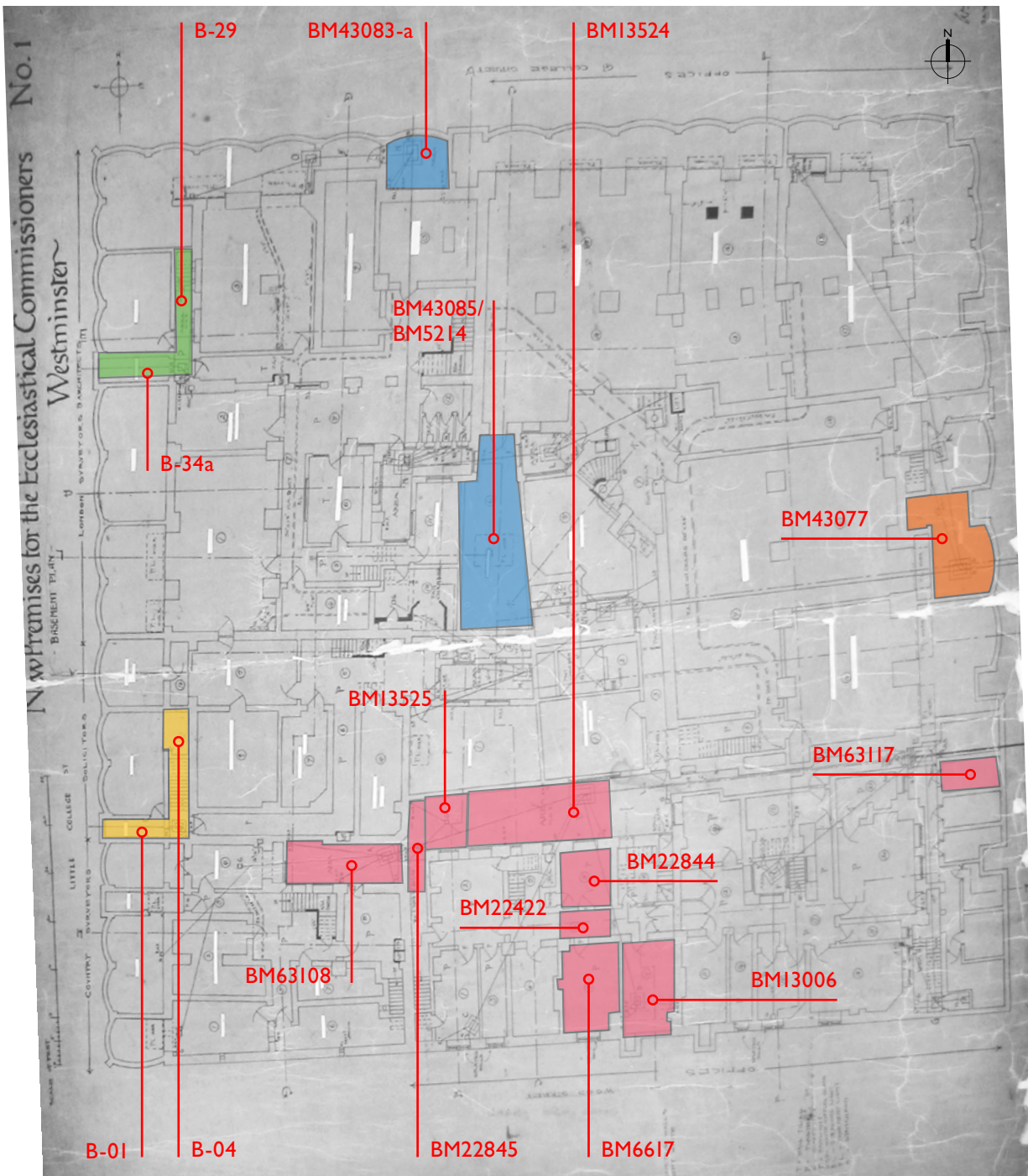
The series of spaces making up the Pink Zone (BM 63117, BM 13006, BM 6617, BM 22422, BM 22844, BM 13524, BM 13525, BM 22845 & BM 63108) has retained the original floor plan in parts and undergone alteration in other areas. BM 63117 remains in its original configuration as a vaulted space beneath Millbank accessed by a door to the west. BM 13006 and BM 6617, located beneath the Great Peter Street elevation, were both served by single doors from the main basement corridor on the south side of the building. BM 6617 was plastered, featured a fanlight above the door and a paired window in the south external wall. BM 13006 was a simpler space with a drain and no windows

or plastering. BM 22844 was plastered with a fanlight above the door; there was a small adjoining cupboard used as a safe and a window overlooking the large 'area' to the north. The presence of fanlights, windows and plaster wall finishes suggests that BM 6617 and BM 22844 were of slightly higher status than the other rooms discussed and were in office rather than storage use. The former 'area', which provided light to the surrounding basement spaces including two stairwells, no longer remains and has since been internalised and subdivided to form BM 13524 & BM 13525. BM 63108 was another 'area', although much smaller and remains today. Both the corridor spaces affected by the proposed works, BM 22422 & BM 22845, were original circulation spaces.

The same historic plan shows the Orange Zone (BM 43077 & BM 33113) as a two-part vaulted space beneath Millbank, accessed from vaults to the north and a stair to the north-west up to street level. The northern part of the vault has since been extended further under Millbank to the east. There was a drainage gully in the floor to the south.

The 1903 plan shows that the Blue Zone comprised a vault space beneath Great College Street to the north of the site (BM 43083-a) and a long room at the centre of the basement (BM 43085). The former featured a drainage gully and was accessed via the vault spaces to the west and the latter, accessed from the north, sat beneath the central courtyard as indicated by the pavement lights providing light into the basement space.

HISTORICAL DEVELOPMENT



Basement floor plan, Millbank House, W. D. Caroe, 1903 (Church of England Record Centre)

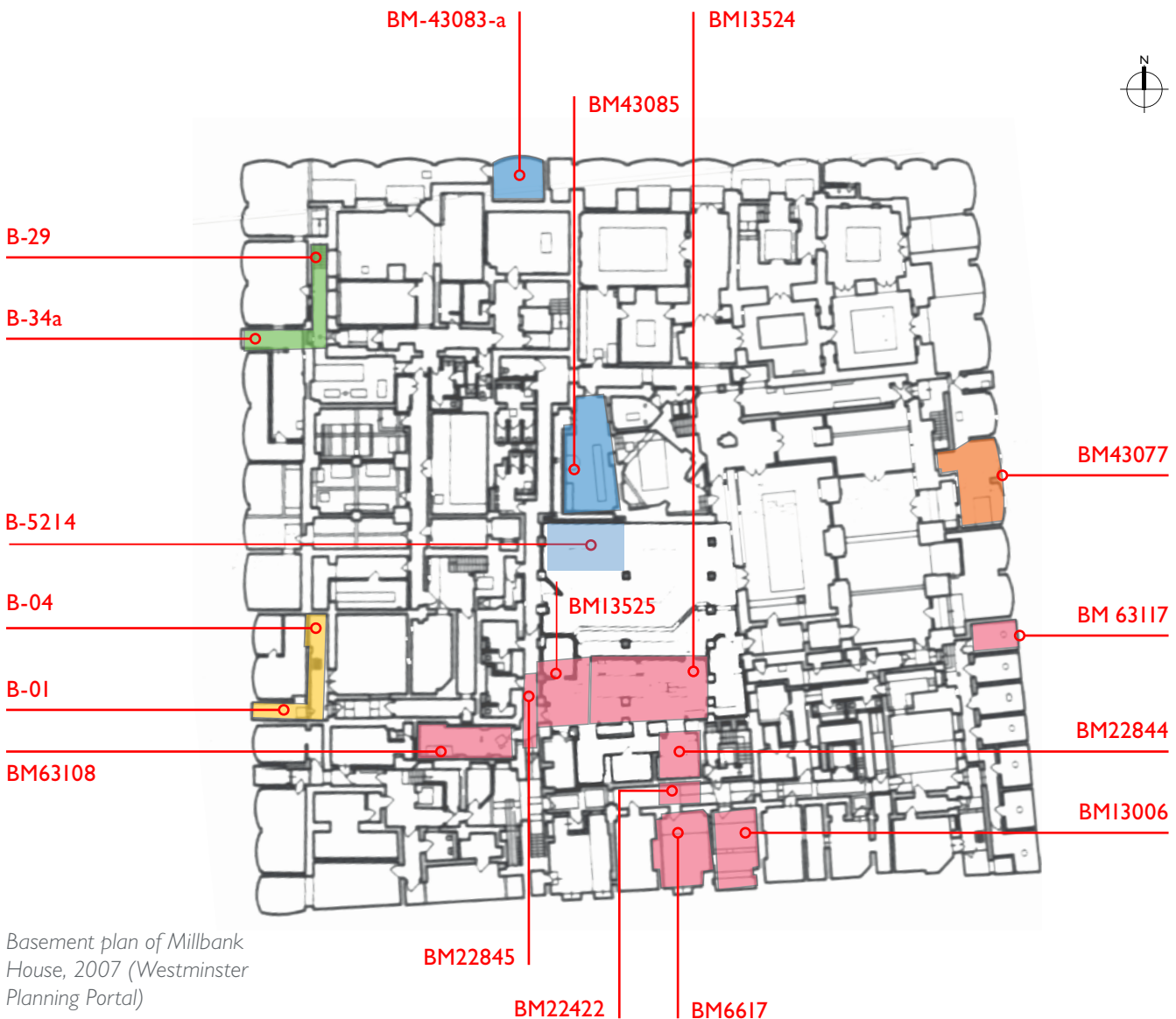
HISTORICAL DEVELOPMENT

The basement level, including the areas affected by the proposals, underwent alteration and subdivision during the 20th and early 21st century. The Yellow Zone vault space retained its historic configuration, although the historic stair was replaced with a smaller ladder stair, and another opening, this time double, was added from Millbank House into the B-04 lightwell. As for the Green Zone, whilst the lightwell stair appears to have remained in B-29, the plan form of the B-34a vault space was eroded with walls removed and openings added creating a more open plan space with the surrounding vaults. Another opening was added from the lightwell to the vault space adjacent to B-34a.

The Orange Zone vault space, BM 43077, was extended slightly to the east at its northern end,

reaching its present configuration and the Pink Zone vault space further south under Millbank, BM 63117, remained unchanged. The Pink Zone spaces under the southern elevation bounding Great Peter Street, BM 13006 and BM 6617, were not altered in plan form, whereas BM 22844, BM 13524 and BM 13525 were altered in association with the infilling of the former 'area' and conversion to kitchens and a canteen. The 'area', now BM 63108, appears unchanged from the early 20th century plan, although plant was added into the space.

The Blue Zone vault space, BM 43083-a was unchanged in plan form, as was BM 43085 although a new opening was opened between this and BM 43081 to the south and plant equipment was installed.



HISTORICAL DEVELOPMENT

Alterations since 2007 include further erosion of the Green Zone vault space, B-34a, through the removal of additional wall fabric to the north and the opening of an interconnecting doorway between the Pink Zone rooms BM 13006 and BM 6617.

There were larger scale works associated with the refurbishment of the basement in 2007 (07/10814/LBC) to remove the former catering and kitchen facilities and provide new catering facilities within the central/ east section of the basement. Pink Zone rooms BM 13524 and BM 13525, formerly a single kitchen space, were converted to two separate spaces, adopting their present configuration; the conversion involved the removal of kitchen equipment and the replacement of carpet tiles and suspended ceilings.

Major refurbishment works were consented in February 2016 (15/07481/FULL & 15/07482/LBC) including the refurbishment of existing offices and a new six storey glazed link extension within the internal courtyard. The substantial works resulted in internal alterations at every level including in the proposed zones for the flood alleviation works. The slab and screed were demolished in the Green Zone vault space B-34a and there were minor works including openings for the relocation of services in BM 13525 and BM 63108 (Pink Zone). The works also included the installation of new mechanical plant within the basement.

SECTION 5.0

ASSESSMENT OF SIGNIFICANCE

The following approach to defining levels of significance is proposed and has been adapted from that devised by J. S. Kerr based on the Burra Charter.⁰¹

5.1 LEVELS OF SIGNIFICANCE

High: A theme, feature, building or space which has a high cultural value and forms an essential part of understanding the historic value of the site, while greatly contributing towards its character and appearance. Large scale alteration, removal or demolition should be strongly resisted.

Medium: A theme, feature, building or space which has some cultural importance and helps define the character, history and appearance of the site. Efforts should be made to retain features of this level if possible, though a greater degree of flexibility in terms of alteration would be possible.

Low: Themes, features, buildings or spaces which have minor cultural importance and which might contribute to the character or appearance of the site. A greater degree of alteration or removal would be possible than for items of high or medium significance, though a low value does not necessarily mean a feature is expendable.

Neutral: Themes, spaces, buildings or features which have little or no cultural value and neither contribute to nor detract from the character or appearance of the site. Considerable alteration or change is likely to be possible.

Intrusive: Themes, features or spaces which actually detract from the values of the site and its character and appearance. Efforts should be made to remove these features.

5.2 ASSESSMENT

5.2.1 Evidential

'The potential of a place to yield evidence about past human activity'

There have been several phases of development on the site of Millbank Island over the centuries, beginning with the 15th century Great Hostry Garden, followed by mid-17th century buildings and gardens, and finally prior to the construction of Millbank, early 18th century housing. Below ground archaeology, however, is considered low owing to the deep basements of the present building and the piled foundations of the 1980s courtyard extension, which would have truncated shallow archaeological deposits. It is possible that some deposits remain at considerable depths, whilst others may lie between modern and historic disturbance.

The fabric and structure of the existing Millbank House, comprising steel, masonry and concrete, has some potential to yield information relating to contemporary early 20th century materials and construction techniques used. Since the building's construction, the basement has undergone various phases of alteration and subdivision. Whilst impacting upon its original plan form, these phases of change form part of the building's evolution and reflect the changing uses of the basement and the lower significance of this floor relative to the upper floors. Despite the partition alterations and new openings in each zone, the original layout is legible in most spaces although the evidential value of BM 13524 and BM 13525 (Pink Zone) as a functional external 'area' has been reduced owing to the infilling, internalising and subdivision of this external space in the 20th and 21st centuries.

⁰¹ Kerr, J. S. Conservation Plan, 2013.

ASSESSMENT OF SIGNIFICANCE

Historic plans provide further detail enabling a greater understanding of the original floor plan as well as recording architectural details or features that are no longer extant including plaster wall finishes, door fanlights or pavement lights.

Owing to the survival and availability of original and later plans of the basement, the low potential for the survival of archaeological remains and the alteration and subdivision of the basement, the basement and the areas for proposed works can be considered to have **low evidential value**.

5.2.2 Historic

'The ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative'

The historic value of Millbank Island is rooted in its location and relationship with the Palace of Westminster and Westminster Abbey, to which the area was historically linked containing orchards, fields and gardens supporting the monastic community. The existing building was purpose-built by W.D. Caroe in the early 20th century for the Ecclesiastical Commissioners, later the Church Commissioners who bring an important historical association to the site. The building also carries a notable historic association with Caroe, the prominent Edwardian architect who served the Ecclesiastical Commissioners from 1885 until 1938.

Much of the basement wall fabric dates to Caroe's original construction, and therefore carries some historic association with the architect, however, this significance is low relative to the higher significance of the surviving, principal partition walls on the above-ground floors. The original wall fabric around most of the vault spaces and rooms affected therefore has

some, low historic significance, although where fabric has been removed for example in B-34a (Green Zone), this historic value is reduced. BM 13524 and BM 13525 (Pink Zone), originally a large 'area' providing light and ventilation to the basement, has minimal historic value today owing to subsequent infilling and subdivision. The historic value of the basement concrete floor slab and screed has been impacted by breaking up and removal in places including in B-34a (Green Zone). Other spaces have been impacted by the removal of original staircases, for example in B-04 (Yellow Zone), and modern openings including the interconnecting doorway between BM 6617 and BM 13006 (Pink Zone)

Whilst the wider site of Millbank Island has **high historic value**, the basement and the areas for the proposed works have **low historic value**.

5.2.3 Aesthetic

'The ways in which people draw sensory and intellectual stimulation from a place'

Many of the interiors across Millbank have been altered and modernised but areas of considerable aesthetic importance include the main staircase and lightwell rising up through the building, the north and east facing front offices, the former Board Room and Caroe's study with its mezzanine floor and oak panelling.

Unlike the high-status offices and receptions rooms on the principle floors, the basement interiors, including those in the areas for proposed works, are of neutral significance owing to their largely utilitarian function, lack of visible historic or decorative architectural features and visible cable trays and trunking. Certain rooms at this level, may originally have functioned as office spaces, as

ASSESSMENT OF SIGNIFICANCE

indicated by annotations on historic plans showing door fanlights, plastered walls and windows, however, these spaces including BM 6617 and BM 22844 (Pink Zone) have lost any original aesthetic character owing to the removal of such features or the infilling of original windows. The presence of the original vaulting and walls is important in retaining a sense of the basement's historic plan form. This layout is less legible in B-34a, where the wall fabric has been eroded since the 20th century. The 'areas' or lightwells draw some aesthetic value from the historic white glazed bricks that were employed to reflect light into the basement. Whilst these remain within most lightwells, the bricks are damaged or missing in places, owing to service interventions and lighting arrangements. The aesthetic character of the vault spaces is negatively impacted by water ingress and the associated corrosion of steel beams, caused to expand and laminate, including in BM 63117 (Pink Zone) and BM 43077 (Orange Zone). The modern BM 22422, BM 13524, BM 13525 (Pink Zone) have no notable historic or decorative features and are characterised by suspended ceilings and modern tiles or carpet tiles of no aesthetic significance.

For the reasons laid out above, the basement and the areas for the proposed works can be considered to have **neutral aesthetic value**.

5.2.4 Communal

'Derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory'

—

The communal value of Millbank Island stems from its original and continued use as a place of work, as well as its historic association with the Church of England and its positive contribution to the townscape as an important local landmark to the passer-by or tourists visiting Westminster.

Whilst the basement level is of secondary importance to the principal floors and largely occupied by service areas and storage, it is highly frequented by members of staff owing to the location of the canteen and restaurant, giving it some communal value. The areas for the proposed works have minimal communal value as underused vault spaces or storage rooms.

For the above reasons, the basement level and the areas for proposed works are considered to have **low/ neutral communal value**.

SECTION 6.0

IMPACT ASSESSMENT

6.1 PROPOSALS

The proposed flood alleviation works are required to mitigate against two main causes of flooding, sewer flooding and surface water flooding; the measures comprise breaking up slabs, creating chambers to house pumps, demolition and rebuilding of walls at low level to facilitate works and installing pressure pumps from basement to ground level. For a detailed description of the works please refer to the application drawings and the Design and Access Statement prepared by Purcell.

6.2 ASSESSMENT METHODOLOGY

An assessment of impact measures the identified levels of significance against the degree of change proposed. High levels of change to features or fabric identified as highly significant will be at odds with national and local planning policy, and also Historic England guidance, so should not be permitted due to the high adverse impact it would entail. Where only a minor change is proposed to an element of moderate or high significance, this will generally be calculated as having a negligible or minor adverse impact on heritage value.

Positive changes (repairs, removal of intrusive features, etc.) are highly beneficial changes and can increase the significance of a building. Where a change is identified as having an adverse impact on the significance of a building or site, this does not necessarily mean that the proposals as a whole would be detrimental: impact is a cumulative calculation and beneficial change may substantially outweigh any adverse proposals. The degree to which the scheme beneficially or adversely impacts the identified heritage values is measured according to the criteria set out in paragraph 7.2.

IMPACT ASSESSMENT

6.3 IMPACT ASSESSMENT CRITERIA

MAGNITUDE OF IMPACT	DEFINITION
High Beneficial	The development considerably enhances the heritage values of the identified heritage assets, or the ability to appreciate those values
Medium Beneficial	The development enhances to a clearly discernible extent the heritage values of the heritage assets, or the ability to appreciate those values.
Low Beneficial	The development enhances to a minor extent the heritage values of the heritage assets, or the ability to appreciate those values.
Negligible/None	The development does not change the heritage values of the heritage assets, or the ability to appreciate those values.
Low Adverse	The development erodes to a minor extent the heritage values of the heritage assets, or the ability to appreciate those values.
Medium Adverse	The development erodes to a clearly discernible extent the heritage values of the heritage assets, or the ability to appreciate those values.
High Adverse	The development substantially affects the heritage values of the heritage assets, or the ability to appreciate those values.

6.4 IMPACT ASSESSMENT

Yellow Zone works

Low/Negligible

The breaking out of the existing concrete floor slab is needed to identify pipework location, size, connectivity, material and depth beneath B-01 and part of B-04 as part of investigatory works prior to interventions. As part of flood alleviation works, the existing chamber, which is insufficient, will be replaced, ensuring to avoid existing foundations.

The removal of the concrete slab, one of the only original features within this space, and a feature that is consistent with much of the flooring across the basement, will cause some impact to the area's significance. This impact is however partly mitigated by the floor's relatively low level of significance within the context of the building and owing to its utilitarian finish and location in an underused basement storage area. The reinstated floor slabs will also ensure to match the existing concrete materiality and finish. The low impact of the proposed works is balanced within the context of the necessary upgrade to the drainage system, which will be better served to prevent flooding from sewer surcharge. The Zone will be tanked/ damp-proofed, which is beneficial to the preservation of the basement and the Listed Building as a whole.

The removal of sections of wall will be kept to the absolute minimum but where this is required to facilitate the underground works associated with flood alleviation, there will be very low impact to the significance of the space as the existing materials will be salvaged and used for rebuilding. The rebuilt sections will resemble the existing owing to matching decorative finishes and repairs will be like-for-like where needed.

Green Zone works

Negligible

The breaking out of the existing floor slab is needed as part of investigatory works prior to interventions to determine the exact location of existing foundations and to identify pipework location, size, connectivity, material and depth beneath B-34a and part of B-29. As part of the flood alleviation measures, a replacement chamber will be installed, in place of the existing insufficient chamber, which will avoid the existing foundations.

The breaking out of the concrete slab to B-34a will cause no heritage impact as the original slab was demolished in 2016 along with that to surrounding vault and basement spaces. The section of slab proposed for removal in B-29 is minimal and of negligible impact owing to the alteration/ removal of the floor slabs in its wider setting. The floor slab will be reinstated to match the existing concrete materiality and finish. The Zone will be tanked/ damp proofed, which is beneficial to the preservation of the basement and the Listed Building as a whole.

20th and 21st century partition alterations have partly eroded the historic plan form of B-34a, however, the removal of further sections of wall will be kept to the absolute minimum. Where this is required to facilitate the underground works associated with flood alleviation, there will be very low impact to the significance of the space as the existing materials will be salvaged and used for rebuilding. The rebuilt sections will resemble the existing owing to matching decorative finishes and repairs will be like-for-like where needed.

Pink Zone works

Low/Negligible

The breaking out of the existing concrete floor slab in BM 13006, BM 13525 and BM 63108 is needed as part of investigatory works prior to interventions to determine the exact location of existing foundations and to identify pipework location, size, connectivity, material and depth. As part of the flood alleviation interventions, new concrete sump pits will be installed in the three rooms mentioned above, which are necessary to collect all incoming pipes. In addition, a pressured pipe will be routed from below the slab to above ground level in the lightwell BM 22850 before dropping to basement high level and discharging to the sewer.

The sumps will avoid the existing foundations where possible, however, some underpinning may be required, depending on the findings of the trial pit investigation. This requirement will be reviewed during the detail design stage. The breaking up of concrete slabs in the three rooms will cause some impact to the area's significance. This impact is however partly mitigated by the slabs' relatively low level of significance within the context of the building and owing to their utilitarian finish and location in underused basement spaces. The reinstated floor slabs will also ensure to match the existing concrete materiality and finish. The low impact of the proposed works is balanced within the context of the necessary upgrade to the drainage system, which will be better served to prevent flooding from surface water flooding and sewer surcharge. The Zone will be tanked/ damp-proofed, which is beneficial to the preservation of the basement and the Listed Building as a whole.

The installation of a pressured pipe into lightwell BM 22850 from below the slab up to street level and back will involve the loss of original white glazed bricks and some fixing to stonework, however, these localised, minimal interventions will cause very low impact to the significance of the space. The proposed cast iron pipe will do little to reduce the character of the lightwell, which is already cluttered with cable trays and wiring and features modern service interventions to the white glazed bricks. From street level, the pipe will be barely visible to the passer-by, almost entirely below ground level and screened by black metal grilles, therefore causing negligible impact to the significance of the elevation.

The removal of the metal stud walls in BM 13525 would cause no heritage impact, as these were added in the early 21st century as part of conversion and re-partitioning works. Any other low level wall removal, for example in BM 63117, to facilitate works associated with flood alleviation, is mitigated by the reinstatement of these walls in materiality and finish. The traditional door and frame to BM 63117 has minimal significance within the basement floor or Millbank House more widely, therefore its replacement with a new louvred door to match the others in the lightwell is of negligible heritage impact. The temporary removal and replacement of the modern suspended ceilings in several of the spaces for the installation of pipework will not affect the heritage values of the basement.

Orange Zone works

Low/ Negligible

The breaking out of the existing concrete floor slab is needed as part of investigatory works prior to interventions to determine the exact location of existing foundations and to identify pipework location, size, connectivity, material and depth beneath BM 43077. As part of the flood alleviation interventions, a new concrete sump pit will be installed, which is necessary to collect all incoming pipes, and a pressured pipe will be routed from below the slab to above ground level before dropping to basement high level and discharging to the sewer.

The sumps will avoid the existing foundations where possible, however, some underpinning may be required, depending on the findings of the trial pit investigation. This requirement will be reviewed during the detail design stage. The removal of the concrete slab, one of the only original features within this space and a feature that is consistent with much of the flooring across the basement, will cause some impact to the area's significance. However, this impact is partly mitigated by the floor's relatively low level of significance within the context of the building and owing to its utilitarian finish and location in an underused basement storage area. The reinstated floor slab will ensure to match the existing concrete materiality and finish. The low impact of the proposed works is balanced within the context of the necessary upgrade to the drainage system, which will be better served to prevent flooding from surface water flooding and sewer surcharge. The Zone will be tanked/ damp-proofed, which is beneficial to the preservation of the basement and the Listed Building as a whole.

The installation of pressured pipes in lightwell BM 33113 from below the slab up to street level and back will involve the loss of original white glazed bricks and some fixing to stonework, however, these localised, minimal interventions will cause very low impact to the significance of the space. The proposed cast iron pipe will do little to reduce the character of the lightwell, which is already cluttered with cable trays and wiring and features modern service interventions to the white glazed bricks. From street level, the pipe will be barely visible to the passer-by, almost entirely below ground level and screened by black metal grilles, therefore causing negligible impact.

The removal of sections of wall will be kept to the absolute minimum but where this is required to facilitate the underground works associated with flood alleviation, there will be very low impact to the significance of the space as the existing materials will be salvaged and used for rebuilding. The rebuilt sections will resemble the existing owing to matching decorative finishes and repairs, will be like-for-like, where needed.

Blue Zone works

Low/ Negligible

The breaking out of the existing concrete floor slab is needed as part of investigatory works prior to interventions to determine the exact location of existing foundations and to identify pipework location, size, connectivity, material and depth beneath BM 43083-a, BM 43083 and BM 5214. As part of the flood alleviation interventions, new concrete sump pits will be installed in the two rooms, which are necessary to collect all incoming pipes. In addition, a pressured pipe will be routed from below the slab to above ground level in the external space BM 43083-a before dropping to basement high level and discharging to the sewer.

The sumps will avoid the existing foundations where possible, however, some underpinning may be required, depending on the findings of the trial pit investigation. This requirement will be reviewed during the detail design stage. The breaking up of concrete slabs in the two rooms will cause some impact to the area's significance. This impact however is partly mitigated by the slabs' relatively low level of significance within the context of the building and owing to their utilitarian finish and location in underused basement spaces. The reinstated floor slab will ensure to match the existing concrete materiality and finish. The low impact of the proposed works is balanced within the context of the necessary upgrade to the drainage system, which will be better served to prevent flooding from surface water flooding and sewer surcharge. The Zone will be tanked/ damp-proofed, which is beneficial to the preservation of the basement and the Listed Building as a whole.

The installation of pressured pipes in the external 'area' (BM 43083-a) from below the slab up to street level and back will involve localised damage to brickwork, however, the minimal interventions will cause very low impact to the significance of the space. The proposed cast iron pipe will do little to reduce the character of the lightwell, which is already cluttered with cable trays and modern service interventions. From street level, the pipe will be barely visible, almost entirely below ground level and screened by black metal grilles, therefore causing only negligible impact.

6.5 SUMMARY

The proposed works have been informed by a detailed understanding of the history and significance of the areas affected by the proposals and, overall, the works are considered minor or negligible in extent and impact. The Conservation Management Plan (April 2020) identified significant risk of flooding, as indicated by the flooding during Summer 2018, which affected the basement, and the existing drainage systems have proven inadequate. The upgrade of the flood mitigation measures is therefore of crucial importance to the long life and preservation of the basement, but also the Listed Building as a whole.

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