



Dolphin Square

PLANNING STATEMENT

21 December 2021

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1. INTRODUCTION

- 1.1 This planning statement is prepared by DP9 Planning Consultants for the Applicant, Dolphin Square Estate s.a.r.l. in support of the proposals for the restoration of Dolphin Square.
- 1.2 This Statement assesses the planning considerations associated with the Proposed Development and considers the Proposed Development in the context of national, regional and local planning policy and guidance.
- 1.3 This Statement should be read together with the application submission documents as listed in the covering letter.
- 1.4 The following chapters of this Planning Statement are structured as follows:
- Section 2 describes the Site and surrounding area.
 - Section 3 describes the Site planning history.
 - Section 4 summarises the pre-application discussions and community engagement process.
 - Section 5 describes the proposals.
 - Section 6 identifies the planning policies relevant to the determination of the application.
 - Section 7 provides an assessment of the proposals against the relevant planning policies.
 - Section 8 provides a conclusion.

Background to the Proposals and Project Vision

- 1.5 AXA-IM Real Assets (AXA-IM RA) acquired the Site in September 2020 and announced its intention to return this much-loved estate to its best in line with the core values ensuring clear, consistent consideration to environmental, social and governance principles. The restoration programme would be guided by the following vision:

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- 1.6 To preserve the building.
 - 1.7 Our approach takes inspiration from Dolphin Square's heritage to retain the character and enhance the estate's built environment.
 - 1.8 To modernise the mechanical services and the environmental performance of the building.
 - 1.9 Investing in the utilities infrastructure, harnessing innovation and technology, combined with good estate management to reduce the carbon footprint of the building, during the restoration programme and future day to day operations.
 - 1.10 To improve the interiors, amenities and apartments for contemporary living.
 - 1.11 The design of amenities, the introduction of new services and the adoption of evolving technologies will enhance the experience for residents and visitors alike, improving attraction and accessibility to the wider community.
 - 1.12 To protect the residents, gardens and the community.
 - 1.13 Safeguarding Dolphin Square's long-term future, well-being of residents and making a positive contribution to the local community.
 - 1.14 To include and value diversity in our community.
 - 1.15 Welcoming a cross section of society and reflective of London as a whole, Dolphin Square will play an active role in our neighbourhood as a housing provider and as a catalyst for investment and short and long term job creation in Westminster. Our restoration programme will be shaped and guided by clear community engagement.
 - 1.16 To restore the attraction of living at this quintessential London address.
 - 1.17 The restoration programme will preserve all that we value about the estate, whilst incorporating all that it needs to be a special place to live, work and visit in the heart of the Pimlico community.

2. SITE CONTEXT

The Site

- 2.1. The Site comprises the Dolphin Square Estate which is located on the riverside, within Pimlico. Building commenced in 1935 and was completed in 1938, it is a rectangular / quadrangle building comprising 13 houses as a residential block arranged around a central courtyard and garden. The houses are ten storeys (including ground), except for Rodney House which is 7 storeys tall. Perceived as joined buildings, they are organised internally with individual entrances and cores.
- 2.2. The Site is bound by Chichester Street to the north with Pimlico Academy and primary school opposite; Grosvenor Road and the Thames to the south with the eastern and western carriageways either side, with the mid-19th century townhouses on St George's Square (a grade II listed terrace) and Claverton Street beyond, respectively.
- 2.3. Dolphin Square is reputedly the largest private residential block of flats in the UK made up of 1,225 residential units, with permanent residential use located in the buildings on the east, west and southern sides and short-term letting serviced apartments (Use Class C3 – Residential) in the northern block (Rodney House) fronting Chichester Street.
- 2.4. In addition to the residential accommodation that is provided, the Site also includes an inward facing retail arcade located at ground floor level within Rodney House; a leisure club including spa, gym, swimming pool and squash courts; restaurant and estate management facilities and offices. A podium building containing the leisure club and restaurant protrudes into the garden at its northern end, accessed from Chichester Street through Rodney House.

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- 2.5. The central courtyard comprises a landscaped garden originally designed by Richard Sudell, with a further garden located above the podium building. The garden on the podium rooftop is commonly known as the Moroccan Garden. Paragraph 5.25 of The Dolphin Square Conservation Area Audit explains that this was re-modelled in the late 1990s.
- 2.6. 153 cars and a servicing area accessed from the eastern and western carriageways is provided in a basement beneath the aforementioned garden. A further 98 car parking spaces are provided at street level. 251 spaces are provided in total on the Site.

The Surrounding Area

- 2.7. The surrounding area contains a range of built forms and scales with the Pimlico Academy located to the north of Chichester Street, which includes a mixture of playground and sports pitches across the whole north of the site.
- 2.8. To the south, beyond Grosvenor Road, lies the tennis courts and bowling green which face onto the Thames. These form part of the existing Dolphin Square Estate, but do not form part of this planning application but are subject to separate proposals for refurbishment and rejuvenation (Ref. 21/08232/FULL).
- 2.9. There are listed heritage assets to the immediate east of the Site. These comprise 123 St George's Square, 76-108 St George's Square and 89-105 St George's Square. All the properties are ground plus four storey townhouses and are Grade II listed. There is only one building, 72-74 St George's Square, which is unlisted as it is a relatively modern insertion made of brick.
- 2.10. To the west lies the Churchill Gardens Conservation Area with Claverton Street and Churchill Gardens beyond.

Public Transport Connections

- 2.11. The Site is located in Zone 1 and is well served by public transport with Pimlico Underground Station within a reasonable walking distance.
- 2.12. Due to the size of the site, the PTAL rating varies from 4 to 6 which is considered to be moderate, good and very good respectively by Transport for London (TfL).

Site Designations

- 2.13. The Site falls in the WCC City Plan Central Activities Zone (“WCC CAZ”) and also is within the London Mayor’s Central Activities Zone (“LP CAZ”). It is also in the Thames Policy Area and an Area of Nature Deficiency.
- 2.14. The Site falls within the Dolphin Square Conservation Area, with part of the eastern and western carriageways falling within the Pimlico Conservation Area.
- 2.15. The Dolphin Square Estate is identified as an unlisted building of merit in the Dolphin Square Conservation Area Audit. The 1930s filling station on the Grosvenor Road is also identified as of merit in the Conservation Area audit.
- 2.16. Historic England added Dolphin Square Gardens to the Register of Parks and Gardens of Special Historic Interest in England in July 2018 and they are listed Grade II.

3. PLANNING HISTORY

- 3.1. A Certificate of Lawfulness of Proposed Use was granted for the use of part first and second to sixth floors of Rodney House as 148 permanent residential dwellings (Class C3) in December 2005 (reference number: 05/07439/CLOPUD) (CD/C5). This included 143 of the flats being used as temporary sleeping accommodation. The certificate stated *“The Council considers that the existing lawful use of the application premises in respect of 143 flats is temporary sleeping accommodation as defined by the Greater London Council (General Powers) Act 1973, and with respect to 5 flats on the first floor as permanent residential use. Both uses are considered to fall within Class C3 of the Town and Country Planning (Use Classes) Order 1987. The proposed use is also within Class C3. Article 3 of that Order and s55(f) of the Town and Country Planning Act 1990 provide that a change to another use within that same use class is not development requiring planning permission. The Greater London Council (General Powers) Act 1973 does not prescribe that a change back from temporary sleeping accommodation to permanent residential use constitutes development. On this basis no planning permission is required to use each of the 148 existing flats as permanently occupied flats within Class C3.”*
- 3.2. Planning permission was granted for the removal of the existing glazed facade, entrance doors and canopy and installation of new windows, doors, canopy and paving at front ground floor level (Chichester Street frontage) of Rodney House in September 2006. Reference number: 06/03899/FULL.
- 3.3. Planning permission was refused for the erection of a canopy to the front entrance of Rodney House in February 2008 on design grounds. Reference number: 07/10898/FULL.
- 3.4. On 28 June 2018, the Secretary of State for Digital, Culture, Media and Sport (the “SoS”) decided not to add Dolphin Square to the List of Buildings of Special

Architectural or Historic Interest and accordingly granted a Certificate of Immunity from Listing for a period of 5 years from the date of the decision.

- 3.5. Historic England added Dolphin Square Gardens to the Register of Parks and Gardens of Special Historic Interest in England in July 2018 and they are listed Grade II.
- 3.6. On 22 July 2019, WCC refused planning permission re. 18/01099/FULL for *“Part redevelopment and refurbishment of Dolphin Square including the reconfiguration of existing residential (Class C3) apartments; demolition and reconstruction of Rodney House to provide a new ground plus 9 storey building with 2 basement levels to provide residential (Class C3), serviced apartments (Class C3 temporary sleeping accommodation), retail (Class A1-A4), leisure (Class D2); single storey rooftop extensions to the retained and refurbished Houses to provide additional residential (Class C3); new row of townhouses (Class C3) to the Western Carriageway; landscaping and new publicly accessible open space; new and reconfigured access points; and all necessary enabling works. (The application now includes 57 on-site affordable and intermediate rented units).”* An appeal against this decision was lodged on 21 January 2020 but withdrawn on 4 September 2020 and the inquiry was cancelled.

4. PRE-APPLICATION DISCUSSIONS & COMMUNITY ENGAGEMENT

Pre-Application consultation

- 4.1. Two pre-application meetings have been held with City of Westminster planning, design and conservation officers firstly in May 2021 and then at a second meeting on-site in September 2021. The first pre-application meeting introduced the principle of making a number of changes to the building that would require planning permission. These changes explained the concept vision to improve the environmental performance of the building, enhance the fire safety and provide a better entrance sequence from Chichester Street more appropriate for the scale of the development. The proposals also introduced the concept of restoring the gardens and considered options for how this could be best achieved. At the first meeting the Applicant was also exploring the capacity to install triple glazing and how to accommodate the air source heat pumps proposed in an appropriate manner.
- 4.2. The primary concepts for the proposal were supported in principle, with further design development required, together with a site visit to understand in greater detail the impact that some of the detail proposals would have on the specific arrangements on site.
- 4.3. At the site meeting in September officers took the opportunity to inspect a full scale mock up on the timber double glazed sash window proposed and to view this alongside the existing windows against the brickwork in the same light conditions. The proposal to install air vents rather than a vent header was selected as the preferred option to maintain the balance of the proportions of the windows being replaced.
- 4.4. The design and access statement sets out further details of the options considered, including those discounted and provides justification for why the

preferred solutions have been selected that form part of these planning applications.

Community Engagement

- 4.5. Under the new ownership the Estate is in the early stages of a restoration program designed to protect and enhance Dolphin Square and its gardens for the long term. At the centre of these plans is dedicated community engagement. The stakeholder strategy identified three key stakeholder groups. These were residents (people who called Dolphin Square home); staff who work at the Estate (many of whom live locally); and, the neighbouring community including local groups and local leaders. In spring to 2021 the Applicant conducted a series of in-depth interviews to engage with individuals who have close connections to the Estate. The aim of this exercise was to draw out perspectives and feelings about Dolphin Square, with a particular focus on the themes and ambitions directing the future of the Estate.
- 4.6. In July 2021 a dedicated restoration program website was launched dsqrestoration.co.uk. This resource is regularly updated as the program progresses and is designed to keep all stakeholders informed and includes the vision ambition and approach, the benefits and improvements the restoration program will deliver, and the proposed house by house project timeline. At the same time a mobile app designed to help current residents', local business owners and the surrounding community stay in touch was launched. The app enables users to follow progress and to opt in to alerts and updates. A dedicated community engagement suite was also opened within the estate. This provides flexible meeting space for residents, staff and local stakeholders to attend in person community engagement sessions and exhibitions and host face-to-face meetings with members of the team. The space also displays information and provides printed copies of all communications for those who do not use email or unable to access the Internet.

- 4.7. In September 2021 a series of Townhall style staff briefings took place with more than 100 members of staff. Between the 9th and 11th of November 2021 the Applicant hosted a series of community engagement exhibitions. All residents received a personalised email and printed invitation, and local community leaders were also invited to attend. The exhibition gave participants the opportunity to meet the team in an informal and relaxed setting and learn more about the restoration scope and process as well as ask questions provide comment and share feedback.
- 4.8. The stakeholder surveys undertaken to document the feedback received during the engagement identified a number of key and consistent themes. These included that the fabric was tired; and the importance of the amenities including the gym, pool, spa, retail arcade and Gardens. Residents did express a view that more workspace meeting rooms and use of the empty spaces behind the existing reception would be of benefit. The gardens are perceived as a great asset, but more can be done to improve these. The Moroccan Garden was identified as a lovely quiet spot but lacking shade and tables and chairs. A desire was expressed for a café workspace within the Estate that would be welcomed particularly if it could connect to the outdoor space. The environmental performance of the building was widely recognised as a problem and in particular the old leaky windows were singled out as desperately in need of replacement. All of this feedback has informed the design proposals subject of the planning applications now promoted.

5. APPLICATION PROPOSALS

5.1. The vision contained in Section 1 outlines the background to the proposals and the overall vision.

5.2. The proposals are separated for the purposes of the planning applications into two distinct areas. The works to the building fabric involving the replacement of the windows, the installation of MVHR, roof insulations, PV cells, smoke extracts, alterations to balustrades and provision of dry riser inlets are grouped together as Application 1.

5.3. The description of development for Application 1 is as follows:-

“Installation of mechanical ventilation and heat recovery; replacement windows with double glazed timber framed sash windows; replacement central heating plant distribution and apartment emitters and provision of air source heat pumps; roof insulation; installation of photovoltaic cells to the roof spaces; provision of fan assisted smoke extract ventilation at roof level; alterations to and replacement roof level balustrades and terrace screens; provision of dry riser inlets, including all necessary enabling works.”

5.4. The proposed improvements to the Chichester Street main entrance and extensions to the amenity block and works to rejuvenate the gardens are grouped together and referred to as Application 2.

5.5. The description of development for Application 2 is as follows:-

“Alterations to the Chichester Street main entrance to provide a double height glazed entrance lobby, extensions to the amenity block to provide physical connections between the internal and external amenity spaces and improve accessibility to the Moroccan Gardens; replacement, rationalised and consolidated plant, installation of new air source heat pump enclosures,

rejuvenation of the landscaped gardens, including all necessary enabling works.”

- 5.6. As set out in the vision the purpose of the development is to make significant improvements to the energy performance of the Estate alongside improvements to the fire strategy as part of the restoration proposals.
- 5.7. The existing building fabric suffer significant heat losses. High quantities of heating are required and in turn result in high energy use and a very poor carbon footprint for the estate.
- 5.8. Gas fired boilers consume 315 kWh per meter cubed per year of energy at Dolphin Square to provide heating and hot water. To put this into context building regulations require new development proposals not to exceed more than 100 kWh per meter cubed per year of energy usage.
- 5.9. The project team have reviewed the energy reduction measures that are feasible during the planned refurbishment of the estate. This review has identified a number of measures which are technically feasible and appropriate within the constraints of an existing building of merit in a conservation area.
- 5.10. The changes proposed include reducing air permeability into the apartments, installing mechanical ventilation with heat recovery to allow good air quality during cold periods without opening the windows, and replacing all the windows with double glazed timber framed sash windows to match the existing appearance. The roofs will be insulated, the central heating plant and distribution is replaced, as is the hot water plant distribution. Air source heat pumps are added to the central heating system and the Estate is converted to operate on a fully electric technology in the future. Photovoltaic cells will be installed on the roof.

- 5.11. Some of these works will not be noticeable from the exterior of the building but others do affect the external appearance materially and require planning permission. Those works that do require consent include the works to the roofs, the replacement windows, and the installation of the MVHR which requires new air bricks into the facades.
- 5.12. The submitted design and access statement provides a very detailed explanation of the approach to carrying out each of the proposals.
- 5.13. As a result of the proposed changes to the plant systems some of the existing structures at roof level become redundant and will be removed and the roofscape will be de-cluttered. The existing plant rooms will be retained and a new roof covering to the main roof will be provided with insulation in its simplest form to improve the thermal performance of the building fabric. In addition, new smoke extract ventilation equipment will be installed to improve the fire safety. Vertical smoke ventilation shafts will be installed to the common corridors of each house. These will be powered by extract fans on the roof which open in the event of a fire to pull smoke from the corridors to create a safer means of escape for residents. The new smoke extract equipment will be located in the centre of the plan on the existing roofs to minimise the visual impact from neighbouring vantage points. They will be shielded from view via a louvred enclosure approximate 2.3 m high.
- 5.14. With the installation of insulation at roof level the perimeter balustrades and guarding need to be adjusted to take account of the slightly raised level. These changes have minimal impact on the visual appearance. A number of the setback roof terraces at eighth and ninth floor will also be upgraded with new balustrades and screens to improve visual privacy in between apartments.
- 5.15. The analysis of energy use identified that improving the windows thermal performance could be a major contributing factor in reducing energy use on

the Estate. Some windows on the Estate have been replaced with double glazed systems but the majority are still single glazed and in need of replacement. There is a basic set of six sash window types used across all the houses configured from a common pane module. To improve the performance of the windows the replacement double glazed sash units will have one sheet of glass instead of the individual panes. The pane appearance is simulated by applying a bead to the glazing each side of the glass. A white gasket is included in the cavity of the glazing which replicates the external putty lines you would see on a single glazed window.

- 5.16. The future installation of MVHR has the largest impact on reducing the carbon footprint of the estate. The MVHR provides fresh filtered air into the building whilst retaining most of the energy that has already been used in heating the building. This heat recovery ventilation solution will be fitted into each apartment to provide a constant supply of fresh filtered air maintaining the air quality was being practically imperceptible in terms of external appearance.
- 5.17. The systems require two ducts; one to supply air to the heat exchanger within the apartment, and one to extract it. Both need to terminate to the external for a face of the building. A number of options were considered including louvres over the window heads, but the preferred strategy is to install air bricks within the building facade these have minimal visual implications.
- 5.18. A cast metal air brick consistent across the estate is proposed to provide a uniform appearance. The frequency and rhythm of the air brick positions across the facade can be controlled to provide a uniform appearance. In some instances, this will involve installing some decorative grills which are not required to provide ventilation in order to offer a consistent finish.
- 5.19. An additional fire safety enhancement for residents on the Estate is the installation of a dry riser system for the Fire Brigade.

- 5.20. The dry riser system will limit the length of hoses that the Fire Brigade needs to carry up the building. The dry riser inlet locations connect at ground level adjacent to each house entrance. These will be freestanding posts within the landscaping. They will be clad in stone, and they will have a planter incorporated into the top of the post to minimise the appearance.
- 5.21. These various energy performance and facade improvement works have been grouped together into a single planning application.
- 5.22. Simultaneously we are also submitting a separate application to upgrade to the entrance experience from Chichester Street. In the original design the Chichester Street frontage was deemed a secondary location and its design reflects this. The introduction of the Pimlico Underground station in 1972 led to a greater use of Chichester Street as a main entrance which also coincided with Grosvenor Road becoming a busier route and less used as an entrance. As the role of the Chichester Street entrance has evolved over time it has suffered from a number of compromises including a lack of grandeur in scale and clarity for visitors to enter the estate.
- 5.23. The deep plan means that the internal lobby space lacks natural light. The windows to the Chichester Street frontage are limited and sit within recesses. The floor to ceiling heights is restricted which reduces the sense of openness within the entrance lobby.
- 5.24. They have been several attempts over the years to make improvements to the Chichester Street entrance. There was previously a glazed extension and entrance portico but this was removed as it was considered unsuccessful.
- 5.25. The single storey amenity block that protrudes into the main garden space to the south of Rodney House now incorporates some unsightly plant equipment

at roof level serving the leisure club below. The original architect's vision for a grand Pavilion opening onto the gardens is still intact but has been compromised by the alterations to the Estate over the years. This leaves the Moroccan garden somewhat detached from the existing amenities and only accessible from steps to the south.

- 5.26. The proposal seeks to introduce a remodelled central Chester Street portico facade in a double height entrance. Moving through into the Estate this then creates a two-storey building link section between the back of Rodney House and the amenity block providing physical connection at first floor to the terrace overlooking the gardens on the podium level. These amendments make improvements for disabled access to the entrance lobby and provide a visual connection between the street entrance and the internal square which improves daylight and sunlight into the lobby. The roof space is de-cluttered and planted creating a visual amenity as well as a new access through to the Moroccan Garden.
- 5.27. As noted earlier in this statement air source heat pumps are proposed. An earlier pre-application design considered placing these at roof level but due to their size and bulk it was considered that this was inappropriate.
- 5.28. An alternative strategy now employed involves locating the Air Source Heat Pumps at basement level and using the existing ventilation locations within the gardens to exhaust the air from the ASHP in the basement. This requires relatively modest adjustment to the existing landscape features and provides for a very well disguised and discrete solution.
- 5.29. As part of the Estate refurbishment proposals a major restoration of the landscape gardens will be undertaken to designs by Sally Prothero. The vision for the landscape is to restore the original design intent by Richard Sudell. The hard and soft landscape proposals are set out in great detail within the accompanying landscape design and access statement and application

drawings. Separate proposals for the refurbishment of the tennis court adjacent to the river on the other side of Grosvenor Road are the subject of a third planning application.

6. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 6.1. This section provides an overview of the planning policy framework. Section 7 appraises the proposed development against the relevant planning policies.
- 6.2. In dealing with the planning application the local planning authority shall have regard to the provisions of the development plan so far as material to the application, to any local finance considerations (so far as material to the application) and to any other material considerations (section 70(2) Town and Country Planning Act 1990). Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where in making any determination under the Planning Acts, regard is to be had to the development plan, the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision maker, in considering whether to grant planning permission for development which affects a listed building or its setting, 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.
- 6.4. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision-maker to pay special attention to the desirability of preserving or enhancing the character and appearance of Conservation Areas.

The Development Plan

- 6.5. The Development Plan for the purposes of Section 38(6) of the Act 2004 is the London Plan (“LP”) (2021), and the Westminster City Plan (“WCP”) (2021).

Other Material Considerations

The National Planning Policy Framework

- 6.6. The National Planning Policy Framework (NPPF) was published in February 2019 and provides planning policy guidance at a national level and is a material

consideration in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning authorities to approve development proposals that accord with the development plan without delay.

- 6.7. The replacement NPPF was published in February 2019, and establishes the overarching principles of the planning system, including the requirement of the system to ‘drive and support development.’

The Pimlico Neighbourhood Plan

- 6.8. The Pimlico neighbourhood plan has been formally submitted by the Pimlico Neighbourhood Forum to the Council for consultation. Regulation 16 consultation on the plan ran from the 20th June 2021 to the 23rd August 2021. An independent examiner for the Pimlico neighbourhood plan is considering the draft plan, the submission documents and all representations received. The examiner is considering whether the draft plan meet the basic conditions required. If adopted the plan will become part of Westminster’s statutory development plan and will be used alongside the Councils own planning documents and the mayors London plan in determining planning applications in the Pimlico neighbourhood area.

7. PLANNING POLICY ASSESSMENT

Westminster's vision

- 7.1. Westminster City Council adopted the new City Plan in April 2021. The vision outlined in the Plan is for a City where people choose to live or work because it's enriching; the City that focuses on the needs of our community and beyond and the City that will be sustainable for generations to come. The proposals align with the vision outlined in the City Plan, focussing on enhancing the quality, safety and environmental performance of the existing buildings for the occupants to the benefit of the community in a sustainable way.

Westminster's spatial strategy

- 7.2. Policy 1 addresses Westminster's special strategy and states that the City will continue to grow, thrive and inspire the heart of London as a world city by *"...Supporting the growth modernisation and adaption of a variety of business space to provide at least 63,000 new office based jobs alongside other forms of commercial growth. Balancing the competing functions of the central activity zone as a retail and leisure destination, visitor attraction, global Office centre, and homes to residential neighbourhoods."* This policy confirms that growth will primarily be delivered through the intensification of the CAZ. The proposals fall in line with the strategy by providing opportunities for growth and modernisation within the restoration of the Estate in the CAZ.

Managing development for Westminster's people

- 7.3. Policy 7 deals with managing development for Westminster's people to ensure the development will be neighbourly. The scale of the proposals is restricted to ensure that they have no adverse environmental impact on neighbours.

Town centres, high streets and the CAZ

- 7.4. Policy 14 addresses town centres, High Streets and the CAZ advising that the intensification of town centre high streets and the CAZ to provide additional floor space for main town city centre uses is supported in principle, subject to impact on townscape and heritage. The proposals fall in the CAZ and provide a modest increase in town centre Class E use.

Local environmental impacts

- 7.5. Policy 33 sets out the local environmental impacts identifying noise and vibration as key measures advising that proposals should not adversely affect neighbouring occupiers or the environment. The proposals are designed to comply with the standard noise conditions imposed on development proposals.

Green Infrastructure

- 7.6. Policy 34 states of the council will protect and enhance the city's green infrastructure to maximise its environmental, social and economic value. The proposals maintain and enhance the green infrastructure mainly comprising the central square and gardens through a sensitive restoration programme.

Energy

- 7.7. Policy 36 advises that the council will promote zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise the effects of climate change. The development is focussed on making significant environmental performance improvements to the existing Estate to reduce on-site energy demand and minimise the effects of climate change.

Design and heritage

- 7.8. Policies 38, 39 and 40 are concerned with the design principles, responding to Westminster's context, sustainable design, promoting excellence in contemporary design preserving Westminster's unique historic environment including registered historic parks and gardens and assessing developments against townscape and architecture criteria.
- 7.9. Policy 43 regarding public realm advises development should contribute to well-designed clutter free public realm with use of high quality and durable materials preserving Westminster's unique historic environment including registered historic parks and gardens.
- 7.10. The proposals in the two planning applications are assessed in Heritage terms by CityDesigner. Their accompanying heritage statement concludes that the proposals represent sensitive and harmonious change that to the Dolphin Square Estates complex within the Dolphin Square Conservation Area. The proposals respond to the requirement for functional and sustainability improvements.
- 7.11. These changes cause no harm to the Conservation Area nor to the Gardens or buildings themselves.
- 7.12. The proposed alterations will lead to a number of benefits such as an improved entrance on Chichester Street leading to a new and enhanced amenity space and enlarged amenity block that better mediates between Rodney House and the central gardens and significantly improves the energy and sustainability performance of the Estate.
- 7.13. The proposals accord with relevant national, regional, and local policies and guidance. These include the NPPF, London plan policy and City Plan policies 38, 39, and 40.

Other Material Planning Considerations

The National Planning Policy Framework

7.14. Chapter 4 of the NPPF relates to decision making. Paragraph 38 states that:-

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permissions in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.”

7.15. The NPPF restates the importance of pre-application engagement and front loading, and the use of planning conditions and obligations where they are required and meet all the relevant tests.

7.16. Paragraph 124 states that 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 to make development acceptable to communities.

7.17. Paragraph 127 provides criteria for policies and decisions to ensure developments function well, have good architectures, are sympathetic to local character and history, establish a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe inclusive and accessible.

7.18. The NPPF sets out a range of measures to promote healthy and safe communities, including open space and recreation; to promote sustainable

transport, and achieve well designed places. Applicants are advised to work closely with the community, (paragraph 128) and local authorities should make appropriate use of processes for improving design, including design advice and reviews, including the recommendations of design review panels. (paragraph 129)

- 7.19. Section 16 of the NPPF relates to conserving and enhancing the historic environment. This updates the previous NPPF, but largely restates the well-established principles set out in the previous version and by subsequent legal decisions.

The Pimlico Neighbourhood Plan

- 7.20. The Regulation 16 Pimlico Neighbourhood Plan contains policy PIM7 in relation to Dolphin Square. Part A advises *“that any proposals for the redevelopment of Dolphin Square should seek to preserve the gardens for the benefit of residents”*. Part B expects *“that any alterations or additions to the external facing elevations of the existing buildings must not materially impact on the views from the other conservation areas in Pimlico.”* The proposals seek to restore the gardens for the benefit of residents in line with the objectives of Policy 7 and the alterations to the façades will have no visual impact in views from other conservation areas in Pimlico in accordance with part D of Policy 7.

8. CONCLUSIONS

- 8.1 This planning statement supports the application for planning permission. Planning law requires that application for planning permission must be the time in accordance with a plan unless Patil considerations indicate otherwise.
- 8.2 Paragraph 11 of the NPPF makes clear that at the heart of the framework is a presumption in favour of sustainable development.
- 8.3 The submitted application information demonstrates that the proposed development accords with the development plan when consider as a whole, and there are no material considerations which would indicate refusal against the provisions of the development plan. Indeed other material considerations point in favour of granting planning permission.
- 8.4 The proposed development meets the relevant national, London Plan and local plan design standards and represents exemplary sustainable architectural quality.
- 8.5 The proposed the weather in body is the prince was a good design a place making any further enhanced by the landscape designs of Sally Prothero. There is an overwhelming case in favour of the proposed development.
- 8.6 The development provides many benefits including enhancing the environmental performance of the building, making improvements to the fire safety for residents, restoring the grade II listed gardens, providing an enhanced entrance sequence from Chichester Street, creating improved accessible routes for all into the gardens, and improving the appearance of the building and enhancing its contribution to the Dolphin Square conservation area.

- 8.7 The proposals are well thought out carefully designed and high quality, have been consulted on extensively with both planning officers and residents of the estate ahead of these applications being submitted.