

CITY OF WESTMINSTER			
PLANNING APPLICATIONS SUB COMMITTEE	Date 3 September 2024	Classification For General Release	
Report of Director of Town Planning & Building Control		Ward(s) involved St James's	
Subject of Report	1 Victoria Street, London, SW1H 0ET		
Proposal	Retention of two storey basement and demolition of existing building above ground level. Construction to provide a building comprising retained basement, ground and nine upper floors for use as retail, restaurant, leisure/experience, medical (Class E (a) (b) (c) (d) (e)) and office (Class E(g)(i)) uses together with associated ancillary spaces to those uses. Provision of public realm enhancements, including new landscaping. Provision of short and long stay cycle parking, on-site servicing, refuse storage, plant and other ancillary and associated works.		
Agent	Gerald Eve		
On behalf of	Mitsubishi Estate London Limited		
Registered Number	24/00977/FULL	Date amended	11 June 2024
Date Application Received	14 February 2024		
Historic Building Grade	Unlisted		
Conservation Area	N/A		
Neighbourhood Plan	N/A		

1. RECOMMENDATION

Grant conditional permission subject to a S106 legal agreement to secure the following:
<ul style="list-style-type: none"> i. The provision of circa 2,405 sqm (GIA) of Affordable Workspace with a minimum of 50% discount of the market rent and a minimum lease term of 25 years. ii. A financial contribution of £2,243,010 (index linked) towards the Carbon Off Set Fund (payable prior to the commencement of the development); iii. 'Be Seen' monitoring and reporting on the actual operational energy performance of the building, including as-built and in-use stage data; iv. A financial contribution of £402,406.66 (index linked) towards initiatives that provide local employment, training opportunities and skills development and supporting the Westminster Employment service (payable prior to the commencement of the development); v. An Employment and Skills Training Plan for the construction and operational phases of the

- development;
- vi. All highway works immediately surrounding the site required for the development to occur including reinstatement of redundant vehicle crossovers in Abbey Orchard Street, creation of a new vehicle crossover (at footway level) in Abbey Orchard Street, changes or improvements to the footway and associated work (administrative, legal and physical);
 - vii. All costs associated with dedication of areas on Great Smith Street and Abbey Orchard Street as public highway.
 - viii. A Walkways Agreement to secure the provision of public access over the open space at the corner of Victoria Street and Great Smith Street
 - ix. The costs of monitoring the S106 agreement.

If the S106 legal agreement has not been completed within 3 MONTHS from the date of the Committee's resolution then:

- a) The Director of Planning shall consider whether the permission can be issued with additional conditions attached to secure the benefits listed above. If this is possible and appropriate, the Director of Planning is authorised to determine and issue such a decision under Delegated Powers; however, if not
- b) The Director of Planning shall consider whether permission should be refused on the grounds that it has not proved possible to complete an agreement within an appropriate timescale, and that the proposals are unacceptable in the absence of the benefits that would have been secured; if so the Director of Planning is authorised to determine the application and agree appropriate reasons for refusal under Delegated Powers.

2. SUMMARY & KEY CONSIDERATIONS

The application proposes the demolition of a 1960s office building at 1 Victoria Street and its replacement with a new commercial building above the retained basement structure comprising ground plus part six, part eight and part nine upper floors. The building would provide 59,432 sqm of Class E office floorspace at ground and upper floors (an uplift of 10, 782sqm) and flexible Class E retail units (5,961sqm) at ground and part basement levels to provide an active street frontage. An enclosed off street servicing bay is located on Abbey Orchard Street. The proposed development includes enhancements to the public realm and streetscape with a particular focus on increasing urban greening through raised planters and a rain garden.

The application was revised in June 2024 during the course of its consideration to allow for additional demolition. The originally proposed 'reinvention option' had proposed the retention of the basement structures and the west wing of the existing building above ground with only the demolition of the east wing and replacement with new construction extending to the perimeter of the site. However following structural investigations indicating corrosion of steel reinforcement bars, this option was no longer viable.

The application site is within the CAZ, lies outside of a designated conservation area, is unlisted, but lies within the direct setting of highly significant heritage assets. Most significant being the Westminster World Heritage Site (WHS) as well as being directly adjacent to a number of conservation areas, including Westminster Abbey and Parliament Square, Peabody Estate: South

Westminster; Broadway and Christchurch; and Birdcage Walk Conservation Areas. The eastern part of the site also sits within several protected London viewing corridors (as identified in the LVMF). View 23A.1 achieved from the Serpentine Bridge, and River side and views 22A.1, 22A.2 and 22A.3 from Albert Embankment.

There are residential flats at the rear of the site on Abbey Orchard Street.

The key considerations in this case are:

- The acceptability of the circular economy strategy which proposes the demolition of the existing building above ground level whilst retaining the existing basement structure (52% of the existing structure would be retained by volume).
- The acceptability of the energy performance of the proposed building.
- Whether the development has delivered sufficient biodiversity net gain.
- The acceptability of the proposed building in design terms.
- The impact of the proposed building on the setting of highly significant heritage assets including the Westminster World Heritage Site as well as a number of other conservation areas.
- The impact on the amenity of neighbouring residential properties.

It is recognised by officers that a spectrum of design options from 'light touch refurbishment' to 'full rebuild' has been explored by the applicant. It is accepted that for the reasons set out in the applicant's pre-redevelopment audit that the originally proposed 'reinvention' option would not be viable. Overall the Circular Economy and Whole Life Carbon assessments submitted are robust.

The proposed development is supported in land use terms. The net uplift in office floorspace would provide a substantial contribution towards the City Council's growth policy objectives and targets within the CAZ.

The proposed replacement building is acceptable in design terms. The introduction of an active street frontage along Victoria Street, enhanced public realm and urban greening is strongly supported.

There would be losses of daylight to a number of residential properties that look onto the application site beyond the recommendations of the BRE Guidelines, notably to Abbey Orchard Street Estate. These impacts are to bathrooms, small kitchens and bedrooms. For the reasons set out in the report the amenity impact is acceptable. No objections have been received from neighbouring residential occupiers.

As set out within Section 9.4, the proposal is considered to cause less than substantial harm to the setting of the Westminster Abbey and Parliament Square Conservation Area and to the identified listed buildings and their settings. The harm would be caused by the new alignment of the proposed development along Great Smith Street which makes the proposed building more assertive than the existing. The level of harm caused would be at the lower end of less than substantial. The public benefits summarised in Sections 9.11 would be significant. Consequently, they are considered to be sufficient to outweigh the less than substantial heritage harm, in compliance with paragraph 208 in the NPPF.

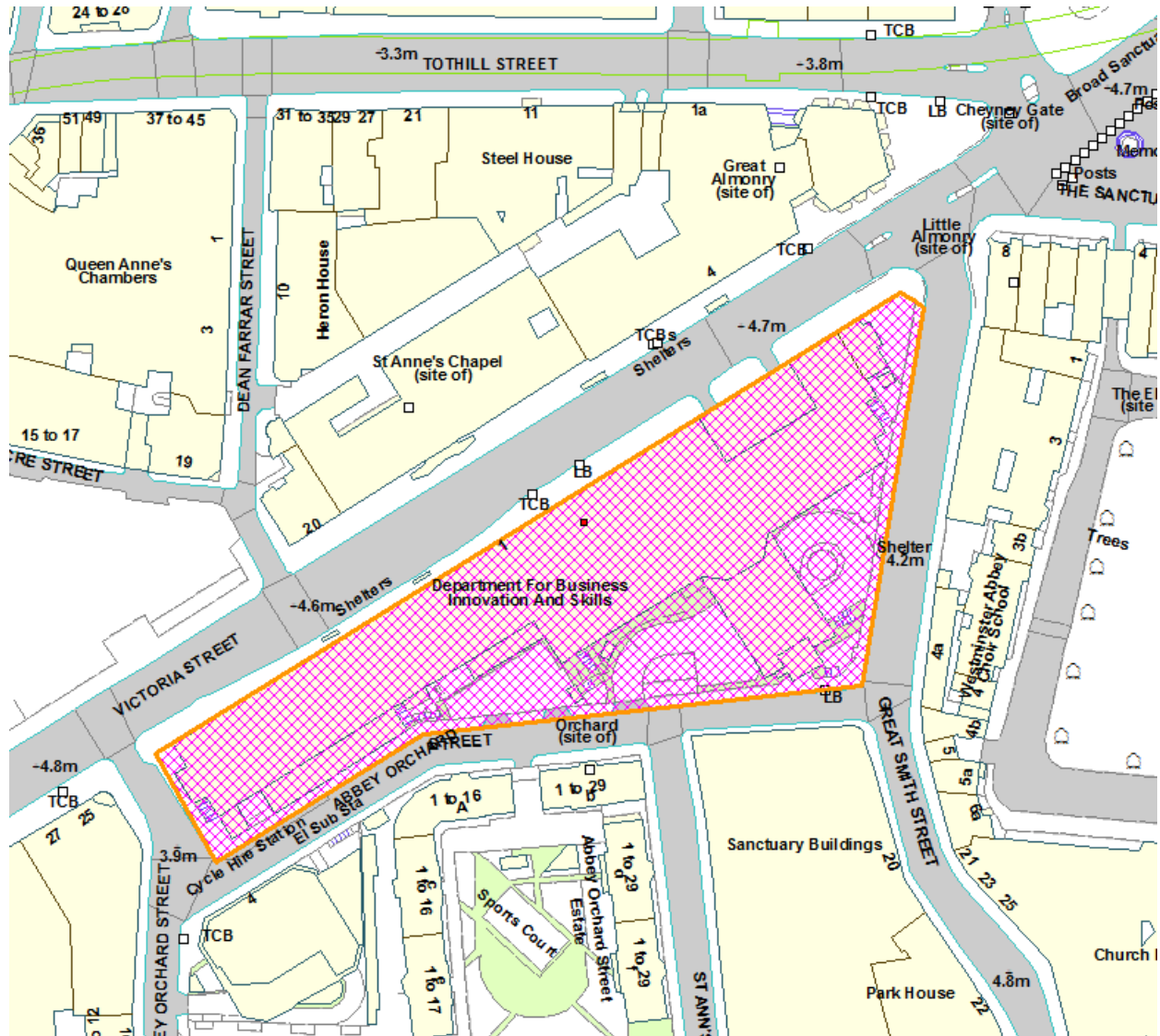
The proposal is referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008 category 1B of the Town & Country Planning (Mayor of London) Order 2008, namely, development which comprises or includes the erection of a building or buildings in central

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London (other than the City of London) and with a total floorspace of more than 20,000 square metres. However the Mayor has advised he does not need to be consulted again. Westminster Council may therefore proceed to determine the application without further referral to the Mayor.

3. LOCATION PLAN



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4. PHOTOGRAPHS



1 Victoria Street looking south-west



1 Victoria Street looking north-east



View of application site from Great Smith Street



View of rear of application site along Abbey Orchard Street showing service yard.

5. CONSULTATIONS

5.1 Application Consultations (for originally submitted and revised scheme)

WARD COUNCILLORS FOR ST JAMES'S

Any response received to be reported verbally.

BUILDING CONTROL - DEVELOPMENT PLANNING

No objection to basement retention.

WASTE PROJECT OFFICER

No objection subject to conditions.

HIGHWAYS PLANNING TEAM - CITY HIGHWAYS

No objections in principle but raises the following issues:

- Query whether there is a shortfall in the number of required long stay cycle spaces.
- It is noted that freight consolidation is proposed but with limited detail.
- All servicing should occur from the loading bay and no servicing, loading or unloading or other delivery activity occurs from the highway.
- A rapid charging point to support electric freight should be provided in the loading bay. Due to limited information on trip generation for the flexible retail uses, there is a potential the proposed uses may have an adverse impact on the operation of the local highway network.

Officer comment: In terms of trip generation, the applicant advises that retail uses, which in the original application were assumed to have all linked trips, have now been assessed within the resubmitted application. This information is with the Highways Planning Manager for assessment.

ARBORICULTURAL SECTION - DEVELOPMENT PLANNING

Concerned about design of tree pits on Abbey Orchard Street and inadequate soil. Alternative tree species should be selected.

Officer comment: Updated information has been submitted by the applicant and an updated response is awaited.

THORNEY ISLAND SOCIETY

The Society objects to the granting of planning permission to this scheme because we do not think the design is sufficiently good for this important site. The Society comments that:

- The brick treatment on the Abbey Orchard Street façade works well.
- The design along Victoria Street is not adequate in terms of choice of materials or massing.
- The corner of the proposed building at Great Smith Street and Victoria Street is a weak response to a design problem, especially as compared with the Westminster Chambers building that was demolished to make way for the existing block. Four storeys would work better. The view of the Abbey's west front from further back on Victoria Street could be achieved better by setting the whole of that façade back.
- In favour of commercial units along Victoria Street.
- Concerned about overshadowing to flats in the Peabody Estate, albeit the upper

floors are set back. We would like to be assured that no neighbouring dwelling is affected by loss of light.

- The Society were pleased to be consulted by the developers on two occasions, and a few of our concerns were addressed such as the change to the chamfered angles at the important corner between Great Smith Street and Victoria Street.

WESTMINSTER SOCIETY

The Society is supportive of the general design approach in terms of infilling to the rear, the activation of the Victoria Street frontage, car free development, the scale of the new infill areas on Abbey Orchard Street in relation to the Peabody residential buildings and the stepping of the massing (except for Great Smith Street) to minimise the impact on surrounding streets. The Society is not supportive of:

- The massing on Great Smith Street which we think adversely impacts on the setting of Dean's Yard, The Society thinks the proposed massing has a much greater impact than the existing building especially in Views 12-15.
- The size and design of the pocket park which needs to be re-thought to provide a more generous area. The Society would question the need for an overhanging 'loggia balcony' to the pocket park.
- The Society thinks the increase in height of the base of the 'prow' from 2 storeys to 3 storeys will further obscure the Sanctuary Building which is an integral part of the setting of the Abbey. This is most apparent in the dynamic views along Victoria Street and the Society is not in agreement with Historic England that this is acceptable.
- The Society would also ask that further work be done on the Victoria Street façade to provide better clearer divisions between the three sections and better CGIs prepared to reflect the actual materials to be used and their colours.

VICTORIA NEIGHBOURHOOD FORUM

Objects on the following observations:

- The proposals should more carefully follow and give regard to the principles by which Westminster Council's retrofit policy is observed and applied.
- Increasing concern at the level of increase in carbon created as a result of the works to be undertaken.
- Consideration should be given as to whether in light of the increase in carbon, would a delay be appropriate to allow for more energy friendly methods to be introduced (e.g. new concrete compositions/materials, eco-friendly/electric construction machinery & vehicles utilised, etc.)?
- The change in application should give consideration to how the view from Victoria Street of Westminster Abbey from a further distance can be better enhanced due to the proposed changes.

GREATER LONDON AUTHORITY (COMMENTS DATED 5 APRIL 2024)

London Plan policies on offices, strategic views, heritage and sustainable development are relevant to this application. The proposal is fully supported in principal and raises no strategic planning issues, so in this instance, there is no need for it to be referred back to the Mayor. Notwithstanding this the applicant should continue to work with Council officers to address the issues summarised below: The affordable workspace must be secured in the S106 agreement

- The design of the scheme has been carefully considered in light of the sensitive

historic context. However, a low degree of less than substantial harm would be caused to the Grade II listed Sanctuary Building and very low less than substantial harm to the setting of listed buildings on the west side of Dean's Yard, in the Great Cloister, Abingdon Street Gardens and College Gardens where the slight increase in height of the proposed development is more noticeable here and at close quarters. GLA officers consider the harm to the heritage assets is outweighed by the public benefits of the scheme, including an uplift of office floorspace and affordable workspace, within a high-quality development.

- The regulated carbon emissions reduction falls below the minimum target but this is in part due to the retention below ground which prevents the use of ground source heat pump technologies, which could provide significant energy savings. In any event, the applicant is urged to make meaningful improvements to this score.
- The applicant has sought to retain as much of the existing building as possible, in line with circular economy and WLC principles, however some of the required information is missing and there are also discrepancies between the circular economy and whole life carbon inputs which should be addressed prior to determination.

TRANSPORT FOR LONDON

Applicant has submitted a night time / hours of darkness assessment as requested by TfL. The night time assessment has provided commentary on the worst sections of each route and identified areas with poor lighting. TfL recommend to Westminster that contributions are secured to increase safety on these routes.

The cycle parking is acceptable and TfL welcome the inclusion of dedicated cargo bike spaces within the loading area. End of journey facilities need to be secured by condition, in addition with short stay located internally a management plan should also be secured to ensure visitors are aware of where the short stay parking is and how to access the short stay cycle parking.

Applicant has acknowledged but not incorporated request for a disabled persons parking space for each use class. It is for WCC to decide whether this is an acceptable strategy.

HISTORIC ENGLAND (LISTED BUILDS/CON AREAS)

Historic England was involved in pre-application discussions last year regarding these proposals. Our main area of interest has been the impact of the emerging plans on the setting of the Westminster World Heritage Site. In response to concerns that we and others have raised, the massing at the east end of the proposed development has been reduced to preserve important views of Westminster Abbey from Victoria Street. We welcome these changes, and no longer consider that harm to the Outstanding Universal Value of the World Heritage Site would result from these proposals. However, the proposed extension would be visible from Dean's Yard and the Great Cloisters, causing a small degree of incremental harm to the listed buildings that enclose these spaces. This harm should be taken into account in determining the application in line with national planning policy.

HISTORIC ENGLAND (ARCHAEOLOGY)

Although this is a major development within an Archaeological Priority Area and close to the Westminster World Heritage Site, exceptionally in this case there will be no

archaeological impact because the 1960s basements will have removed all archaeological deposits. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.

LONDON BOROUGH OF LAMBETH

No objection.

VICTORIA BID

Any response received to be reported verbally.

DESIGNING OUT CRIME

No objection subject to a condition securing Secured by Design Accreditation.

NATURAL ENGLAND

No objection

WCC ECONOMY TEAM

A financial contribution of £402,406.66 and the creation of an employment and skills plan is required.

LOCAL LEAD FLOOD AUTHORITY (LLFA)

Object to planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy / supporting information relating to:

- Further information is required as part of the Drainage Strategy to demonstrate how the site drainage and proposed SuDS will function.
- Not complying with NPPF, PPG or City Plan Policy 35

Officer comment: Updated information has been submitted by the applicant and a further response is awaited.

ENVIRONMENT AGENCY (THAMES REGION)

No objection. The site is located within Flood Zone 3 and is protected to a very high standard by the Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event. Our latest flood modelling shows the site would be at risk if there was to be a breach in the defences or they were to be overtopped. However, we are satisfied that the developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data and there is no sleeping accommodation below the modelled tidal breach flood level.

UK POWER NETWORKS

No objection subject to following standard guidance on proximity to existing substations.

NATIONAL PLANNING CASEWORK UNIT

No response received.

THAMES WATER UTILITIES LTD

No objection subject to standard consultation with Thames Water.

ACTIVE TRAVEL ENGLAND

Given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time.

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED

No. Consulted: 400

Total No. of replies: 2

No. of objections: 1

No. in support: 0

Neither in support nor objecting: 1

PRESS NOTICE/ SITE NOTICE:

Yes

One letter of objection raising the following objections on sustainability and construction impact issues:

- The demolition and subsequent construction activities would contribute to increased carbon emissions and environmental degradation, which is counterproductive to the efforts of achieving net zero targets.
- Retrofitting and repurposing should be considered
- Structurally, the claim that the concrete frame has corroded due to a chloride issue is a point of concern. However concrete frames can be strengthened by various means, including carbon fibre bonding.
- If demolition were to be consented then a sustainable design should be proposed.
- The proposed development is in direct contravention of the UK's obligations to achieve net zero by 2050 and Westminster City Council's 'retrofit first' policy.
- The local community has expressed concerns about the disruption that the demolition and construction activities will cause, including noise, dust, and traffic congestion. These disruptions will adversely affect the quality of life for residents and businesses in the vicinity.

One letter of comment received from local community organisation stating that while they are not in position to comment on the proposed development, they can report on very positive community engagement by the applicant and a commitment to social value through funding important community work and supporting their charitable activities.

5.2 Applicant's Pre-Application Community Engagement

Engagement was carried out by the applicant with the local community and key stakeholders in the area prior to the submission of the planning application in accordance with the principles set out in the Early Community Engagement guidance. The engagement activities undertaken by the applicant (as listed in the submitted Statement of Community Involvement) are summarised in the table below:

Engagement Method/Event/Activity	Date	Attendance	Summary of Discussions
Initial engagement letter sent to 1,054 addresses.	7 July 2023	N/A	Introducing the team and emerging aspirations for the future of the Site, whilst offering the opportunity to meet and engage with the project team via an online webinar.
Online webinar	17 July 2023	3 members of the public,	
Flyer circulated to 1,676 addresses.	13 November 2023	N/A	This flyer raised awareness of the consultation, outlined the emerging plans and promoted the upcoming in-person exhibitions and the virtual exhibition.
Dedicated consultation website launched.	13 November 2023	N/A	The website included a virtual exhibition of the proposals and opportunity for respondents to have their say about the future of the site.
Public exhibition & survey.	23 November and 29 November 2023	22 attendees to public exhibition in total over two days. 13 responses to survey.	Majority of respondents agreed or strongly agreed that the site would benefit from investment. Attractive buildings and green spaces and a design that complements the area seen as important factors for future of site. Carbon should be minimised. New urban greening, cycle parking and end-of-trip facilities important. Mixed response to proposed height and massing. 67% of consultees either strongly liked or liked the design. Two local residents raised expressed disappointment and concern regarding the proposed removal of on-street car parking spaces along Abbey Orchard Street. Construction mitigation. Existing anti-social behaviour. Two local residents living on Abbey Orchard Street expressed concern about the potential loss

			of daylight and sunlight.
Stakeholder meetings including with local councillors, neighbouring site owners and community groups.	Various dates		Retention vs redevelopment Bulk & Scale and Design Protected and local views Greening World Heritage Site status Public Realm Ground Floor strategy Streetscape animation Community initiatives and generating social value Anti-social behaviour Ground floor – particularly design of single storey colonnade. Affordable workspace
Additional stakeholder meetings & Flyer distribution	May-June 2024	N/A	To explain formal revisions to scheme relating to demolition of existing above ground structures.

In summary, across the range of engagement undertaken by the applicant the principal issues raised were views – in the context of the World Heritage Site and surrounding conservation areas, height and massing, design and materiality, urban greening and public realm, sustainability, ground floor retail provision, anti-social behaviour, car parking and construction management.

The applicant's Statement of Community Involvement (SCI) and other application documents identify that the scheme has been revised in the following ways in response to views and representations expressed during pre-application community engagement:

- The SCI advises the applicant has been liaising closely with the Westminster Design Review Panel as well as key local stakeholders, including representatives of the Westminster Abbey to ensure that prominent and protected Views are carefully considered through the design of the Proposed Development.
- With regard to the view of the redeveloped building from The Sanctuary, The applicant responded with a set of steps and tiers in the massing increasing articulation. Two retail units now have entrances on the Great Smith Street/Abbey Orchard Street junction.
- In terms of anti-social behaviour, the previously proposed single storey colonnade has been removed and shopfronts, seating and planters have been redesigned. CCTV surveillance to be installed and all benches will have measures to avoid rough sleeping and inappropriate use.
- In terms of loss of daylight and sunlight the applicant advises that there is a minimum facing distance of 18 m between neighbouring residential properties and the development.
- Following revisions 52% of the structure of the existing building is to be retained by volume.
- The site has an urban greening factor of 0.30.
- The applicant is not proposing to change any permanent on-street parking that surrounds the development.

- A detailed Construction Management Plan will be prepared to align with Westminster City Council's Code of Construction Practice.

The applicant's project team presented to Westminster's Design Review Panel (DRP) on 26 October 2023. This is set out in Section 9.4 and a copy of the DRP report is provided as a background paper.

6. WESTMINSTER'S DEVELOPMENT PLAN

6.1 City Plan 2019-2040 & London Plan

The City Plan 2019-2040 was adopted at Full Council on 21 April 2021. The policies in the City Plan 2019-2040 are consistent with national policy as set out in the National Planning Policy Framework (NPPF) (December 2023) and should be afforded full weight in accordance with paragraph 225 of the NPPF. Therefore, in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, it comprises the development plan for Westminster in combination with the London Plan, which was adopted by the Mayor of London in March 2021 and, where relevant, neighbourhood plans covering specific parts of the city (see further details in Section 6.2).

As set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 47 of the NPPF, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise.

6.2 City Plan Partial Review

The council published its draft City Plan Partial Review for consultation under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 on 14 March 2024. The consultation continues until 25 April 2024. The Partial Review includes updated policies for affordable housing, retrofitting and site allocations.

An emerging local plan is not included within the definition of "development plan" within s.38 of the Planning and Compulsory Purchase Act 2004. However, paragraph 48 of the NPPF provides that a local authority may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Footnote 22 to paragraph 48 states that during the transitional period for emerging plans consistency should be tested against the version of the Framework, as applicable, as set out in Annex 1 (paragraph 230). This means that the consistency of the policies in the City Plan Partial Review must be tested for consistency for the purposes of paragraph 48(c) against the September 2023 version of the NPPF.

Accordingly, at the current time, as the Partial Review of the City Plan remains at a pre-submission stage, the policies within it will generally attract limited if any weight at all.

6.3 Neighbourhood Planning

The application site is not located within an area covered by a Neighbourhood Plan.

6.4 National Policy & Guidance

The City Plan 2019-2040 policies referred to in the consideration of this application have been examined and have been found to be sound in accordance with tests set out in Paragraph 35 of the NPPF. They are considered to remain consistent with the policies in the NPPF (December 2023) unless stated otherwise.

7. BACKGROUND INFORMATION

7.1 The Application Site

Located on the south side of Victoria Street the existing building was constructed in the 1960s and comprises a 'T' shaped footprint of part six / part nine storeys high with basement and sub-basement levels across the full site. The building is formed of two adjoining rectangular blocks slid past each other and joined in the centre. The existing building has an upper ground floor which sits approx. 1.25m above 1 Victoria Street and 2.3m above Abbey Orchard Street pavement level. A double height entrance extension was added at the north-eastern end of the building in 2000. Until the end of January 2024, the site was occupied by the Department for Business Energy and Industrial Strategy as Class E offices but is now vacant.

The existing building replaced Westminster Chambers (Banks and Berry 1869) following its demolition in the 1960s and spans 140m along Victoria Street. The current building, designed by Ronald Fielding Architects for Legal and General, is of limited architectural value, supported by Historic England's decision not to include the building on its statutory list, and grant a certificate of immunity from listing.

The building lies outside of a designated conservation area, is unlisted, but lies within the direct setting of highly significant heritage assets. Most significant being the Westminster World Heritage Site (WHS), which encompasses nationally important and recognisable heritage assets such as, Palace of Westminster (GI) Westminster Abbey (GI), St Margaret's Church (GI), The Sanctuary (GII) and various buildings within Deans Yard (GII). The site also lies within the Westminster and Whitehall Tier 1 Archaeological Priority Area.

As well as being directly adjacent to the Westminster World Heritage Site, the site lies adjacent to a number of conservation areas, including Westminster Abbey and Parliament Square, Peabody Estate: South Westminster; Broadway and Christchurch; and Birdcage Walk Conservation Areas. The eastern part of the site also sits within several protected London viewing corridors (as identified in the LVMF). View 23A.1 achieved from the Serpentine Bridge, and River side and views 22A.1, 22A.2 and 22A.3 from Albert Embankment.

This application is located within the Central Activities Zone (CAZ); Archaeological Priority Area: Victoria Street (Tier II); Flood Zone 3; and Surface Water Flood Risk Hotspot: Old Pye Street.

The surrounding area is mixed in character with predominantly commercial uses on Victoria Street but with some residential as part of the recent New Scotland Yard development. Abbey Orchard Street is generally quieter and more residential in nature, although on the north side of the street is a large area of open servicing yard and ramps that forms part of the application site, with the Peabody Abbey Orchard Street Estate and Luke House (residential on the fifth floor upwards) directly opposite the site. Great Smith Street provides a connection south to Horseferry Road and directly opposite the site on this street there are buildings in use by Westminster School and Westminster Abbey Choir School.

7.2 Recent Relevant History

Permission was granted in 1958 for the erection of an office building on the site of Nos. 1-19 Victoria Street and Nos. 4-12 Great Smith Street. The building was originally designed by Ronald Fielding and constructed between 1959 and 1964. The building was first occupied by the Board of Trade and has been in continuous occupation by a series of government departments for office use until the end of January 2024.

Permission was granted for a glazed ground level extension on Victoria Street in 1994.

Over time other permissions have granted works for replacement windows, replacement boundary treatment / service gates on Abbey Orchard Street, glazed conservatory extension at fifth floor level and replacement plant.

8. THE PROPOSAL

The proposal is for the demolition of the existing building above ground level, whilst retaining the existing basement structures, and construction of new building comprising ground plus part six, part eight and part nine upper floors for Class E purposes. The proposed development seeks to increase the height from 41.87m AOD to 43.68m AOD.

The extent of demolition proposed differs from the originally submitted proposal which was for the retention of the basement structure plus the western wing of the existing building above ground, with demolition of the eastern wing of the building. The application was formally revised in June 2024 following intrusive site investigations where steel corrosion was identified within steel reinforcement bars, which made the retention of the western wing in the originally submitted proposal unviable. (see Section 9.2). The originally submitted scheme in February 2024 sought to retain 61% by volume of the existing structure. The revised scheme proposes to retain 52% by volume of the existing structure.

The primary use will be for Class E(g)(i) office purposes with office space at part ground level and all upper floors. Additional affordable Class E(g)(i) office workspace is proposed at lower ground level. At part ground and part lower ground floors level flexible retail uses are proposed in the form of retail, restaurant, leisure/experience and medical

((Class E (a),(b), (c), (d) and (e)).

The proposed development includes the provision of public realm enhancements with a new landscaped 'pocket park' at the eastern end of the 'prow' of the building and soft landscaping at the rear and to the west of the building on Abbey Orchard Street.

The massing of the proposed building is stepped back at upper levels on all elevations. The tiering approach seeks to break down the length of the Victoria Street façade and allows for the provision of terraces at upper levels to provide outdoor space for building users and opportunity for urban greening.

The proposed development would have a fully enclosed off-street loading bay at the rear on Abbey Orchard Street which would include refuse and recycling storage facilities.

Table: Existing and proposed land uses.

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	+/-
Retail/Restaurant/Leisure (Class E(a)/E(b)/E(c)/E(d)/E(e))	0	5,961	+5,961
Office (Class E(g)i))	48,650	59,432	+10,782
Total	48,650	65,392	+16,742

The space within the proposed building would be arranged as follows:

- Flexible Class E (a to d) retail units accessed from Victoria Street and Great Smith Street located at part ground floor levels including at the prominent corner at Victoria Street / Great Smith Street. These would provide retail, restaurant, leisure/experience and/or medical uses There are 2no. flexible retail areas at basement 01 accessed from the ground floor retail units;
- Office space (Class E (g)) would be provided at part lower ground, part ground and at first to ninth floors levels, accessed from a prominent office entrance and lobby on Victoria Street;
- A 'Town Hall' facility is proposed at basement level 01. The Town Hall is a flexible ancillary space for office users to book for presentations and conferences with seating for approximately 200 person, breakout spaces and associated cloakroom/washrooms;
- External terraces accessed from the office accommodation would be located at all levels from first to ninth floors;
- External screened mechanical plant would be located at seventh, ninth and at main roof level; and
- The basements would accommodate ancillary and supporting elements such as plant, tenant gym and cycle parking and ancillary facilities (with a dedicated cycle access from Abbey Orchard Street).

In terms of materials, on the Victoria Street elevation, architectural fair-faced pre-cast stone is proposed. This would be warm toned except the central section where a paler precast panel is proposed. Abbey Orchard Street and Great Smith Street would be

elevated in a combination of stone and brick, with London stock/buff generally used and red glazed bricks.

9. DETAILED CONSIDERATIONS

9.1 Land Use

Land Use Overview

London Plan Policy SD4(B) states, “The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values”. London Plan Policy E1(A) supports improvements to the quality, flexibility and adaptability of office space of different sizes through new office provision, refurbishment and mixed-use development. London Plan Policy E1(B) states that increase in the current stock of office should be supported in various locations, including the CAZ, whilst London Plan Policy E1(C) states, “The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ... should be developed and promoted”. London Plan Policy E2(B) states, “Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space”.

City Plan Policy 1 outlines how growth will primarily be delivered through the intensification of the CAZ, the West End and the town centre hierarchy in order to provide at least 63,000 new office-based jobs. City Plan Policy 13 reiterates the new jobs target set out within City Plan Policy 1 and provides support for new and improved office floorspace that meets the needs of modern working practices within the parts of the CAZ with a commercial or mixed-use character (which includes the application site), enabling the continued growth and clustering of the creative, knowledge and research based sectors. City Plan Policy 14 supports the intensification of town centres, high streets and the CAZ.

Office (Class E)

The existing office building is nearly 60 years old and we are advised is technically reaching the end of its design life. The building has been under-utilised as it has not been fully occupied for some period of time. It is now fully vacant (since January 2024) and we are advised that it would not be possible to re-let the building without considerable work given the building’s poor current Energy Performance Certificate rating which is rated E.

The proposed development would provide 59,432 sqm (GIA) of high-quality (Grade A and energy efficient) Class E office floorspace (+10,782 sqm) which would optimise the strategic functions of the CAZ. This is supported by London Plan Policies SD4, E1 and E2(B) and City Plan Policies 1(B)(1), 2(A), 13(A) and 14(A). Compared to the existing office floorspace in full occupation, the proposed development leads to an uplift of between 1,080 -1,940 jobs (990 -1,760 FTE’s). This will contribute to the target of providing capacity for at least 63,000 new office-based jobs over the Plan period (i.e. 3,000 jobs per annum), as set out within City Plan Policy 13 and is fully supported.

The office floor levels above ground level would be accessed from the three cores (East, West and West Stair Core) and are designed to be occupied by one tenant or split into two or three smaller tenancies. A condition is recommended to restrict the use of Class E(g) office floorspace to that use only as set out in the application submission.

Affordable workspace

London Plan Policy E1(G) requires development proposals relating to new or existing offices to, "...take into account the need for a range of suitable workspace including lower cost and affordable workspace".

Policy 13C of the City Plan states that proposals involving affordable workspace will generally be supported throughout the commercial areas of the City. Affordable workspace is encouraged in recognition of the role it can play in the growth of small start-up businesses, enhancing local job opportunities and contributing to a diverse economy. The Planning Obligations and Affordable Housing Supplementary Planning Document states that in developments with over 2,500 square metres (sqm)(GIA) of net additional floorspace in any combination of the E(c) and E(g) planning uses, the council would prefer that a minimum of 10% of the GIA of such space to be affordable workspace.

The proposed development would incorporate 10% of the uplift in office floorspace as affordable workspace which would equate to approximately 2,405 sqm (GIA) of affordable workspace provision. The space would be located at lower ground level and would have access to natural light from voids in the floor above. It would have a Category A fit-out to the equivalent quality of the fit-out of the remaining commercial floorspace.

The affordable workspace is welcome in policy terms and could be secured through a S106 legal agreement with a minimum of 50% discount of the market rent and a minimum lease term of 25 years. A condition is recommended to require an Operational Management Plan for the management of the affordable workspace for the council's approval.

Retail/restaurant/leisure uses

City Plan Policy 1 Part B states that growth will be delivered primarily by the intensification of sites in the CAZ to 'provide significant growth in office, retail and leisure floorspace'. Part D of City Plan Policy 14 sets out that the provision of a range of retail unit sizes including small stores in redevelopment proposals are supported in principle and Part G continues that, 'Town Centre uses will also be supported in principle throughout the parts of the CAZ with a commercial or mixed-use character...'

Policy 15 (Visitor economy) states that the Council will maintain and enhance the attractiveness of Westminster as a visitor destination, balancing the needs of visitors, businesses and local communities.

The proposed development would provide 4,727 sqm flexible retail floorspace at ground and lower ground levels facing onto Victoria and Great Smith Streets (with a further

1,234 sqm ancillary plant space largely at basement 02). The flexible retail floorspace is proposed to be provided within six units as set out in the table below. As a guide, the City Plan sets out that small shops will generally be considered as those under 150 sqm gross retail area.

Table: Proposed floorspace for individual flexible retail units

Space	Use	Floorspace (GIA)
Unit 01	Retail/Services Classes E(a) / E(c)	61 m ²
Unit 02	Retail/Medical Classes E(a) / E(e)	120 m ²
Unit 03	Retail/Services Classes E(a) / E(c)	999 m ²
Unit 04	Retail/Restaurant Classes E(a) / E(b)	288 m ²
Unit 05	Retail/Restaurant Classes E(a) / E(b)	789 m ²
Unit 06	Retail/Restaurant/Leisure Classes E(a) / E(b) / E(d)	2,470 m ²
Plant space	Substantially at B2, pro-rata allocated between office and non- office uses Class E(a)/E(b)/E(c)/E(d)/E(e)	1,234 m ²
Total		5,961 m ²

The proposed flexible retail units, together with the main entrance for the office element of the proposed development, would seek activate the frontages on Victoria Street and Great Smith Street. This compares very favourably with the existing building which has no active frontage serving members of the public. The introduction of active uses at ground floor level is fully supported and would enhance the character and function of this part of the CAZ.

The proposed development is seeking flexible retail/services/medical/restaurant and leisure uses for the proposed units within Class E in the configurations set out in the table above. These uses are considered acceptable in terms of City Plan policies 1(B) and 14 as the application site is located in a part of the CAZ with a commercial or mixed-use character. The flexible retail uses proposed would enhance and diversify the offer within this part of the CAZ as a place to shop, work and spend leisure time. Conditions are recommended to restrict the use of the Class E units to uses specifically set out in the application submission. This is in accordance with City Plan 14 as the amount of flexible retail accommodation proposed exceeds 2,500sqm and is located outside of Westminster's town centre hierarchy.

It is also recommended to restrict the proposed leisure use of Unit 6 to gym use only within Class E(d). Class E(d) leisure uses may include experiential interactive leisure uses such as darts, indoor golf and axe throwing. These uses are popular during the evening and with large groups. An operator is not in place for this use and no operational management plan has been submitted with the application. Given the absence of this

information, the large size of this unit and its location close to residential flats on Abbey Orchard Street, there could be an amenity impact from such leisure uses in terms of noise and disturbance contrary. This may be the case particularly late in the evening as Abbey Orchard Street provides the quickest route to public transport options at Victoria and St James's Park. Without this restriction, the proposal would be contrary to City Plan policies 16, 7(B) and 33(C).

Related residential amenity policies for proposed restaurant use

As set out above, the scheme proposes flexible restaurant and leisure uses within Units 4, 5 and 6. Based on the cumulative floor areas of these units, the proposal could provide up to 3,547 sqm of restaurant floorspace. This aspect of the proposed development needs to be assessed against residential amenity related City Plan policies below.

Policy 16 (Food and drink) requires proposals for food and drink and entertainment uses to be of a type and size appropriate to their location. The over-concentration of those uses will be further prevented where this could harm residential amenity, the vitality and character of the local area or the diversity that defines the role and function of the town centre. Applications for entertainment uses will need to demonstrate wider benefits for the local community, where appropriate.

City Plan Policy 7(B) (*Managing development for Westminster's people*) requires new development to be neighbourly by protecting, and where appropriate enhancing local environmental quality.

City Plan Policy 33 (C) (*Local environmental impacts*) relates to noise and states development should prevent adverse effects of noise, with particular attention to:

1. minimising noise impacts and preventing noise intrusion to residential developments and sensitive uses;
2. minimising noise from plant machinery and internal activities;
3. minimising noise from servicing and deliveries; and
4. protecting the relative tranquillity in and around open spaces.

City Plan Policy 33 City Plan Policy 33 (D) (*Local environmental impacts*) relates to odour, and states development will effectively address the adverse impact of odour through the incorporation of appropriate mitigation measures using a precautionary approach.

Our Environmental Supplementary Planning Document (EPSD) (Adopted 2022) provides guidance for developers on how they can meet the environmental policies within Westminster's City Plan 2019 – 2040. The ESPD covers seven environmental topics of which local environmental impacts (e.g. noise and vibration and odour), energy and waste management are the most relevant to this application.

Units 4 and 5 occupy ground floor level only and would be located at the eastern end of the site with entrances on Victoria Street. The individual unit sizes for units 4 and 5 are a scale that is appropriate to their location in a part of the CAZ with a commercial or mixed-use character. Although there are residential uses nearby on Victoria Street within the New Scotland Yard development, these are located at high level and in a building

with a high level of sound protection. The impact to these residential properties would therefore not be significant.

Unit 6, the largest flexible retail unit at 2,470sm, would occupy a small part of the ground floor with the majority of the accommodation located at part basement level 01. Its entrance would be located at the corner of Great Smith Street and Abbey Orchard Street. Whilst a retail unit within Class E(a) would be acceptable in policy terms for the reasons set out above, the provision of a large restaurant unit in this location also raises concerns about the amenity impact on residential occupiers within the Abbey Orchard Street Estate and Luke House located nearby. As with the proposed flexible leisure use for this unit, an operator is not in place for the restaurant use and no operational management plan has been submitted with the application. Once again, given the absence of this information, the large size of this unit and its location close to residential flats, there are strong concerns about the amenity impact in terms of noise and disturbance, particularly late in the evening. (for the same reasons set out above for the leisure use) As submitted the restaurant proposal conflicts with City Plan policies 16, 7(B) and 33(C). A condition is therefore recommended to restrict the use of Unit 6 as a restaurant within Class E(b).

Given the relatively low number of food and drink and entertainment uses in this part of the CAZ, the cumulative impact of the proposed flexible restaurant uses within Units 4 and 5 of the scale proposed would not lead to an over concentration of those uses. The restaurant uses are supported by acceptable servicing and waste storage and collection arrangements. However details of opening hours, number of covers and the capacity of the restaurant uses have not been provided and it is recommended that these are secured by condition in the form of an operation management plan to ensure there is no harm to residential amenity. A condition is also recommended to secure details of kitchen ventilation extraction for the restaurant uses.

9.2 Environment & Sustainability

Sustainable Design

Summary of policy and guidance

NPPF Para. 157 states, “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure” [emphasis added].

London Plan Policy GG5 states, “To conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must... [under Part H]: recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London’s economic success”. The supporting text states, “Creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste, is not only socially and environmentally responsible, but will save money and limit the likelihood of environmental threats affecting London’s future” (Para. 1.6.2).

'Circular economy' is defined within the London Plan's glossary as, "An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'".

The promotion of transitioning to a low carbon circular economy is also supported by London Plan Policy GG6 that states, "To help London become a more efficient and resilient city, those involved in planning and development must... [under Part A]: seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050".

London Plan Policy D3 states, "All development must make the best use of land by following a design-led approach that optimises the capacity of sites ... Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development... that responds to a site's context and capacity for growth... and that best delivers the requirements set out in Part D'. Part D refers to a number of requirements, including under Part 13 that development proposals should, "aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy". Figure 3.2 and the supporting text set out a hierarchy of building approaches which maximises use of existing material, with 'retain' at its heart, stating, "Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process" (Para. 3.3.12).

Retaining existing building fabric is also supported by London Plan Policy SI 7(A)(1) that sets out the objective to, "promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible" and City Plan Policy 37(A) that states, "The Council will promote the Circular Economy...". The supporting text for London Plan Policy SI7 states, "London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments...". (Para. 9.7.1). The large proportion of London's total waste that is made up of construction, demolition and excavation waste is highlighted in London Plan Para. 9.7.4 that states that in 2015, this waste stream constituted 54 per cent of the total waste generate in London (9.7 million tonnes).

Section 2.4 of the Mayor of London's Circular Economy Statements guidance (March 2022) sets out Circular Economy design approaches for existing buildings, with Para. 2.4.1 stating that the 'decision tree' should be followed to inform the design process for the development from the outset (informed by a pre-redevelopment and pre-demolition audits, where possible, and a whole life carbon assessment). In cases where there are existing buildings on site, the decision tree asks it is technically possible to retain these buildings in whole or part. If so, the decision tree asks whether the existing building, or parts of these building, are suitable to the requirements of the site. If the answer is 'yes in whole', the guidance indicates that the building should be retained and retrofitted. If

the answer is 'yes in part', the guidance indicates that the building should be partially retained and refurbished. This approach, the guidance states, is to follow the approach set out in Figure 3.2 of the London Plan, stating, "...retaining existing built structures totally or partially should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option" (Para. 2.4.2). Such an approach is required to adhere to London Plan Policy D3 that states that development proposal should take into account the principles of the circular economy. In terms of what optioneering is expected Para. 2.4.5 adds, "When assessing whether existing buildings are suited to the requirements for the site, applicants should robustly explore the options for retaining existing buildings (either wholly or in part). Where disassembly or demolition is proposed, applicants should set out how the options for retaining and reconstructing existing buildings have been explored and discounted; and show that the proposed scheme would be a more environmentally sustainable development".

City Plan Policy 38(A) states, "New development will incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster's world-class status, environment and heritage and its diverse range of locally distinctive neighbourhoods". City Plan Policy 38(D) (Design Principles) adds, "Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design..." [emphasis added]. The supporting text for City Plan Policy 38 states, "As new developments are large consumers of resources and materials, the possibility of sensitively refurbishing or retrofitting buildings should also be considered prior to demolition..." (Para. 38.11).

Guidance on the meaning of 'sustainable design principles' is found within the 'Retrofitting and Sustainable Design' chapter of the Westminster's Environmental SPD (February 2022). The guidance states, "The upgrade and reuse of existing buildings is a sustainable approach and can help by avoiding the higher carbon footprint associated with constructing new buildings" (p. 104). Page 87 also states, "Where all or part of the existing building can be retained and demolition can be avoided, this will help conserve resources, reduce embodied carbon, minimise waste and avoid dust and emissions from demolition. However, this needs to be carefully balanced against other sustainability objectives, the need to deliver new housing and economic growth, meaning demolition will still be appropriate in some circumstances. When balancing the merits and impacts of retention or demolition of the existing building, the council will consider environmental, economic and social sustainability issues in the round with reference to other City Plan policies". This guidance adds that, "Putting the circular economy into action in Westminster's built environment means in the first instance exploring retention and refurbishment of buildings rather than demolition and re-build. If this is not possible, then incorporating reused materials into a new development" (p.96).

Circular Economy and Whole Life Economy

The submitted Circular Economy Statement, and Whole Life Carbon (WLC) Statements describe the complex work that has been undertaken by the applicant's consultants and architects to assess opportunities for retention and their various analyses. The stated ambition of the applicant from the beginning of the planning process has been to make the scheme as sustainable as possible. The applicant's design approach for the site explored a range of redevelopment options from 'light touch refurbishment' to 'full new

build'.

The existing building dates from 1965, The applicant advises it is technically reaching the end of its design life as the building façade has poor thermal performance with minimal insulation and significant air leakage. In addition the site offers no public amenity benefit and poor-quality public realm..

A pre-redevelopment audit was submitted as part of the Circular Economy statement. This is a tool for understanding whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new development. Archive drawings have allowed the structural engineer to build a 3D model to understand the opportunities and constraints of the building and to also quantify the existing carbon contained within the structure. The application documents set out that the existing building's structure consists of a concrete frame, 3.5 m floor to floor, with typical 4-7m spans and a 5ft (c.1.5m) façade column grid. An unusual feature of the existing concrete frame above ground is that it is constructed from an Omnia Plank system which spans between beams.

The pre-redevelopment audit sets out that the option to refurbish the existing building will have great benefits in maximising retention and reducing associated carbon emissions. However this option was not pursued for the following reasons:

- the east side of the existing building is significantly compromised by the non-standard core and circular lifts. This makes the existing building unsuited for multi-tenanted operation.
- retention of the structure with full replacement of the core would involve such extensive temporary works as to largely eclipse the carbon benefit, as well as significantly constraining the new scheme in terms of future flexibility.
- the refurbishment option would seriously impact any improvement opportunities.

It was the 'reinvention' option, which formed the February 2024 submission scheme, including the retention of the basement, substructure and foundations, plus the western wing of the existing building above ground. The eastern wing was to be demolished for the reasons set out above, and replaced by a new highly efficient and flexible construction, extended to the perimeter of the site. Overall, 61% by volume of the existing structure was originally proposed to be retained.

However, following vacant possession in January 2024, extensive site investigations were undertaken by the applicant's team to assess the strength and condition of the existing structure, and its suitability for reuse. From these investigations the applicant advises the existing superstructure (the pre-cast Omnia planks) are unsuitable for retention due to high chloride levels, carbonation and progressive corrosion in the steel reinforcement bars which will continue to cause further and progressive corrosion in the future. Analysis by the applicant's material specialists estimates that the retained superstructure would reach failure point in approximately 47 years.

The applicant's structural consultant advises that wrapping a new office envelope (including the carbon associated with it) around a corroding retained structure was not considered sustainable or viable for two main reasons:

- if the Omnia planks were retained, the carbon cost of the building over a life of 60 years from today would be higher compared to the proposed Omnia replacement scheme undertaken now since after 47 years a large portion of the building would need to be demolished, replaced and tied into the remainder.
- insurance will not be available for a structure in this unpredictable near-failure condition and so it will not be possible to let the building to tenants.

Therefore an alternative strategy which removes the omnia slabs has been developed. This alternative strategy is the full demolition of the existing building (east and west wings), whilst retaining the existing basement structure (52% of the existing structure by volume).

The Victoria Neighbourhood Forum has raised a concern regarding the extent of demolition proposed and the increased amount of carbon arising from this. An individual objector has also objected to the carbon arising from the proposed demolition and sets out that retrofitting should be considered first. The Forum and the objector both make reference to the council's 'retrofit first' policy. Whilst as part of the Partial Review of the City Plan the council is seeking to introduce a new policy prioritising retrofit and refurbishment of existing buildings where appropriate, the review remains at a pre-submission stage, and as such the policies within it will generally attract limited if any weight at all. (See Section 6.2)

Circular economy assessment

Whilst the existing building dates from 1965, and is approaching 60 years old, concrete frame buildings are generally expected to exceed their design life. It is recognised though that the existing building's façade has low thermal performance, high air-permeability (thermal bridging) and needs replacement.

The findings from initial pre-redevelopment audit (February 2024) state that the retention of the superstructure forming the eastern T-shaped wing is considered unviable due to the shape of the existing circular core lifts. To allow for deeper floorplate layouts, future flexibility and the physical and economic benefits that partial redevelopment would bring, officers initially agreed at pre-application stage with the partial demolition of the eastern T-shaped wing. The majority of the building, including all the floor slabs of the western wing, were initially supposed to be retained, allowing for partial demolition to address inefficiencies of existing layout and improve energy performance, townscape, public realm, biodiversity net gain and provide an overall increase in commercial area promoting economic growth.

However, as set out above, the initial application for partial retention with retrofit and new build was deemed technically unfeasible by the applicant after structural investigations.. The outcome of the surveys found that due to elevated chlorides (salts) in the concrete aggregate the rebar had corroded, and the water used during construction works could exacerbate these effects further. The 47 years to point of failure mentioned by the applicant is understood to be a maximum achievable residual life based on the current sample size; the applicant's structural consultant advises that it is probable there will be Omnia planks with greater corrosion than that seen to date.

The council's Sustainability Officer visited the site to assess the site investigations and the different works that the applicant had tried to remedy the situation. However, due to the level of corrosion and lack of successful mitigation measures available, it is understood that the west part of the building that was due to be retained would also now need to be demolished to realise the benefits of the scheme proposal. The mitigation measures explored (and rejected) by the applicant (see background paper 24) and interrogated by officers are:

- (1) Carbon fibre strengthening – we are advised by the applicant that this solution would not work at 1 Victoria Street because 'Fundamentally it only addresses one mode of failure – bending at mid-span. The shear failure of the weakened corroded system would still fail as you need side/web access to address shear, which is not possible in our Omnia slab system. The warranty on these systems is also generally limited to 15 years on workmanship.'
- (2) Applying a cementitious render to the surface of the Omnia Planks – we are advised this can be employed to slow the passage and rate of carbonation to reinforcement with in-situ concrete slabs, and therefore reduce the risk of reinforcement corrosion. However the applicant advises this would not work with the Omnia system as the carbonation has already reached the reinforcement and there is a chemical problem embedded in the mix – Chlorides. Corrosion would therefore continue at the current rate irrespective of the applied render.
- (3) Applying a corrosion inhibitor (MCI) to the surface of the Omnia Planks - this has been tested on site by the applicant and we are advised that this has not proven successful: In 11 of the 12 beams tested the cementitious render has not stopped the chloride corrosion.

The applicant adds that the removal of the Omnia floor slabs from the project provides specific opportunities to resolve some of the constraints created by the existing superstructure. These include:

- Rationalisation of ground floor levels – the originally submitted scheme had compressed office floors and an upper ground floor approximately 1.5m above street level. The revised scheme provides a consistent ground floor level which aligns with Victoria Street and improved office floor to floor height on every floor.
- Reduction in massing – as originally submitted the proposal extended beyond the existing building footprint, encroaching onto the public highway, at the corner of Victoria street and Abbey Orchard Street. In the revised plan, the west stair core is demolished, allowing the building line to stay within the footprint. Daylight in the office space will also be improved due to glazing on the west elevation at level 01-06.
- Consolidation of cores - the revised scheme replaces the retained west stair core, and partially retained west core with a new west core. This approach allows a consolidated west core strategy to improve efficiency and increase natural light to floorplates.

Officers are satisfied that on the basis of the information provided and the visual inspection, the applicant has tried all available techniques to extend the life of the bespoke Omnia plank structure that would allow for the part retention of the existing building. Officers are advised that the progressive corrosion identified by the applicant is unique to this building and it is unlikely that similar issues would be found in most conventional in situ concrete structures. On this basis officers accept that the viable strategy for this redevelopment is for the re-use of the basement, resulting in 52% of the existing structure by volume, in addition to the overall 25% of recycled content for all new elements. Officers note that there are some additional benefits to the scheme arising from the removal of the Omnia floor slabs as set out above.

The applicant aims to divert 100% of the demolished materials from disposing to landfill, which is welcomed. There are additional benefits to the scheme which are not contributing towards upfront carbon emission savings, but do support the circular construction market, e.g. Material exchange platform options, such as Westminster's Excess Materials Exchange (EME) page, Globechain, or local charities, have been utilised to list items identified for off-site reuse, totalling to 105,249kg of items that have been sent for reuse.

To date, around 11.1 tonnes of glass have been crushed since the start of the soft strip works. These have been investigated for contamination, collected and transported to the Globechain facilities to be recycled back into high quality glass and reuse into other projects. Furthermore, there are approximately 26 tonnes of stripped glass stockpiled onsite, ready to be sent to the recycling facilities with more glass expected once the removal of the internal glazing works starts on site.

The applicant has committed to design for deconstruction and end-of-life strategy, which is welcomed.

Whole life carbon assessment

The WLC assessment is RICS 2017 compliant and covers a sufficient level of detail. Despite challenges (existing building, the proposed new-build concrete frame, the substantial amount of demolition) the applicant submitted in-depth investigations and a series of solutions to minimise embodied carbon emissions.

The WLC assessment shows two scenarios – baseline and optimised.

The baseline portrays a Business-As-Usual design, which would result in 645 kgCO₂e/m². Although considered compliant in relation to GLA Policy SI 2 Minimising Greenhouse Gas Emissions, it falls short of achieving high sustainability aspirations, aligned with LETI and RIBA / industry best practice, as per Policy 38 of Westminster's City Plan and Westminster's Environmental SPDs.

The optimised design is welcomed, and shows lean structural design, reducing the amount of reinforcement in the beams and post-tensioned slabs, and reused steel for all temporary works. Following such improvements, it is estimated that the upfront carbon (A1-A5) would result in 595 kgCO₂e/m², which is just below GLA aspirational target, and LETI 2020 design target. This is considered acceptable, however, the applicant is

strongly recommended to continue efforts to reduce upfront carbon, such as:

- higher recycling content for façade elements
- reused steel members for as much of the permanent steelwork as possible
- reused RAFs, metal ceiling tiles, doors, carpets, or products with high recycled content
- low carbon MEP plant and distribution items, such as carboard/textile or recycled metals

along with the rest of the measures outlined within the WLCA rev 6 (03.06.2024) Table 5 Response to GLA requirements.

The upfront and whole life carbon are summarised on the table below against GLA benchmarks.

Figures reported in kgC02e/m2	1 Victoria street	GLA benchmark (offices)	GLA aspirational benchmark (offices)
Upfront carbon ('cradle to practical completion') (i.e. Modules A1-A5)	595	<950	<600
Whole life carbon ('cradle to grave') (i.e. Modules A-C (excluding B6 and B7))	1111	<1,400	<970

Conclusions on Circular Economy and Whole Life Carbon

It is recognised by officers that a spectrum of design options from 'light touch refurbishment' to 'full rebuild' has been explored by the applicant for the redevelopment of the application site. It is accepted that for the reasons set out in the pre-redevelopment audit and discussed above, namely the steel corrosion in the bespoke Omnia plank system the 'reinvention' option would not be viable. Overall the Circular Economy and Whole Life Carbon assessments are robust.

Conditions are recommended to secure an updated version of the WLC assessment whereby measures should be identified that will ensure that the additional carbon footprint of the proposed development will be minimised and to secure an updated version of the approved Circular Economy Statement that reaffirms the approved strategy or demonstrates improvements to it.

With these conditions attached, the proposed development is considered compliant with London Plan Policy SI2 Minimising Greenhouse Gas Emissions, Policy SI7 Reducing waste and supporting the Circular Economy, following closely GLA's Whole Life Carbon and Circular Economy Strategy guidance for early stages considerations. The proposal

is also largely compliant with the City Plan Policy 38 Sustainable Design and 37 Waste Management.

Energy Performance

London Plan Policy SI 2 requires major development to be net zero-carbon, with a minimum reduction in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) of 35 per cent beyond Part L of the Building Regulations. The Mayor of London's updated Energy Assessment Guidance states that an on-site carbon reduction of at least 35 per cent beyond Part L 2021 of building regulations should be achieved. Non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site provided that an alternative proposal is identified and delivery is certain.

City Plan Policy 36(B) requires major development to be zero carbon. City Plan Policy 36(C) adds, 'Where it is clearly demonstrated that it is not financially or technically viable to achieve zero-carbon on-site, any shortfall in carbon reduction targets should be addressed via off-site measures or through the provision of a carbon offset payment secured by legal agreement'.

Table: Regulated carbon dioxide savings from each stage of the energy hierarchy: Part L 2021 for the proposed development.

	Regulated Carbon Dioxide Savings	
	Tonnes CO ₂ per Annum	%
Be Lean: Savings from energy demand reduction	36.7	14%
Be Clean: Savings from heat network	0.0	0%
Be Green: Savings from renewable energy	0.0	0%
Cumulative on-site savings	36.7	14%
Carbon shortfall	226.6	-
	Tonnes CO ₂	
Cumulative savings for offset payment	6,797	
Cash-in-lieu contribution	£2,243,010	

The key 'Be Lean' strategies include a high-performance façade design that optimises glazing ratios and performance based on each façade orientation to maximise solar

gain, natural daylight, and external views; building services optimised for efficiency, focusing on lighting, hot water systems, and fan energy and an innovative free cooling displacement ventilation system to reducing the requirement for active cooling in the office area by 65% annually.

In terms of 'Be Clean' measures, the proposed development adheres to the GLA heating hierarchy, prioritising district systems, followed by zero-emission or local heat sources. The South Westminster Area Network (SWAN) is a proposed heat network that will cover most of South Westminster and link up two existing heat networks in the area: the Whitehall Boiler System and the Pimlico District Heat Undertaking. It is proposed to route on Great Smith Street and Abbey Orchard Street. A district heat connection is proposed in the plant room located on B2 should the SWAN heat network materialise. It is recommended that this connection is secured by condition.

The key 'Be Green' measures proposed include the use of highly efficient air source heat pumps for heating, cooling and hot water and a 128 sq. array of roof level photovoltaic panels and best practice building fabric materials to achieve low U-values.

Taken together, these measures are expected to reduce the regulated operational carbon emissions by 36.7% compared to a Part L 2021 compliant building. Officers are satisfied that the carbon savings are the maximum that can be achieved on site and that a financial contribution towards the City Council's Carbon Offset Fund of £2,243,010 secured by legal agreement would be used to fund carbon savings off-site to offset the residual operational carbon emissions arising from the proposed development.

BREEAM

City Plan Policy 38(E) requires non-domestic developments of 500 sqm or above to achieve at least BREEAM 'Excellent' or equivalent standard. A BREEAM pre-assessment for the office has been carried out (under the Shell and Core scheme) which indicates a total score of 90.5%, which exceeds the 85% threshold for an 'Outstanding' rating. The pre-assessment for the retail (Shell and Core scheme) shows a total score of 80.2%, exceeding the 70% threshold for an 'Excellent' rating. This aspiration meets the requirement of City Plan Policy 38(E). A condition is recommended to secure post completion assessments.

Air Quality

Policy 32 (Air quality) states that the council is committed to improving air quality in the city and expects development to reduce exposure to poor air quality and maximise opportunities to improve it locally without detriment of air quality in other areas. The applicant has submitted an Air Quality Assessment and Air Quality Neutral Assessment.

An Air Quality Positive Statement has been prepared and submitted as part of the Air Quality Assessment and concludes that the proposed development would not generate any significant emissions once operational from road traffic. The report establishes that the proposed development is better than air quality neutral for buildings and air quality neutral for transport. During the construction phase the impact of dust with appropriate mitigation in place has been classed as 'not significant'. This is in accordance with London Plan Policy SI 1 and City Plan Policy 32.

Flood Risk & Sustainable Drainage

The site is in Flood Zone 3 and within a Surface Water Management Zone. The site has a low risk of surface water flooding from either fluvial or surface water flooding. In terms of sustainable drainage, both London Plan Policy SI 13 and City Plan Policy 35(J) require development proposals to aim to achieve greenfield run-off rates and demonstrate how all opportunities to minimise site run-off have been taken.

Surface run-off from the development is proposed to be attenuated through the use of blue roofs beneath the MEP plant equipment, a basement attenuation tank for other areas of roof and the areas of public realm and a rain garden (260 sqm) to the south of the building along Abbey Orchard Street. Approximately 47% of the roof catchment will be attenuated by blue roofs. A blue roof system provides temporary water storage attenuation at roof level through the use of a layer of geo-cellular crate and restricts the release of this water at the outlets. The total capacity of these blue roofs is 362 cubic metres. A condition is recommended to secure full details of the blue roof design, rates and dimensions.

The proposed SUDs strategy will restrict surface water run off to the public sewer to a peak discharge of 4.80l/s for a 1 in a 100-year (+40% climate change) event. The comparable greenfield run-off rate for the 1 in a 100-year (+40% climate change) event is 3.63l/s.

The Local Lead Flood Authority has raised an objection relating to the proposed SUDS and has requested further information. This has been submitted by the applicant for assessment.

Odour

A condition is recommended to secure full details of kitchen extraction ventilation for the Class E restaurant and leisure uses in accordance with City Plan Policy 33(D).

9.3 Biodiversity & Greening

London Plan Policy G5 (A) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

London Plan Policy G5 Part (B) confirms that Local Planning Authorities should develop an Urban Greening Factor (UGF) assessment for their Borough. In the interim, the Mayor recommends that development proposals seek to achieve an Urban Greening Factor score of 0.3 for major developments which are predominantly commercial. London Plan Policy G6(D) requires development proposal to manage impacts on biodiversity and aim to secure net biodiversity gain.

City Plan Policy 35(G) states, "Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within

areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats”.

Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. The City Plan requires developments to achieve biodiversity net gain, wherever feasible and appropriate (Policy 34G). The Environment Act has introduced a mandatory 10% improvement in biodiversity value by 2023 and this requirement will be incorporated into any update of the council’s Environmental SPD. T

Proposed habitat creation for this development includes creation of extensive biodiverse roof (1,439sq.m), intensive roof / terrace planting (803 sqm), shrub/ ground level planters (151 sqm) and rain gardens (123 sqm) and the planting of four urban trees. Following concerns raised by the Arboricultural Officer, the applicant has revised the design of the tree pits and rain gardens. These are currently being assessed by officers.

The proposed development would have an Urban Greening Factor (UGF) score of 0.31, which meets the London Plan target of 0.3 for commercial developments.

The proposals stand to result in a net gain of 1.41habitat units compared with the pre-development value. This equates to a biodiversity net gain of 11,943% for habitat units, therefore the proposals are compliant with the 10% biodiversity net gain requirement target and City Plan policy.

Conditions are recommended to secure details of the species for the biodiversity measures and for their ongoing management.

9.4 Townscape, Design & Heritage Impact

Legislative & Policy Context

The key legislative requirements in respect to designated heritage assets are as follows:

The significance of the listed buildings, including their setting and the character or appearance of the conservation areas, have been considered, in accordance with Sections 16, 66 and 72 of the Planning (listed Buildings and Conservation Areas) ACT 1990.

Also of consideration, Levelling- Up Regeneration Act 2023, S102, introduces section 58A to the Town and Country Planning Act 1990. This introduces the duty of regard to certain heritage assets in granting Permissions, with the purpose of preserving or enhancing a relevant asset or its setting includes preserving or enhancing any feature, quality or characteristic of the asset or setting that contributes to the significance of the asset.

Chapters 12 and 16 of the NPPF require great weight be placed on design quality and the preservation of designated heritage assets including their setting. Chapter 16 of the NPPF clarifies that harmful proposals should be clearly and convincingly justified and should only be approved where the harm caused would be clearly outweighed by the public benefits of the scheme, including where appropriate securing the optimum viable use of the heritage asset, taking into account the statutory duty to have special regard or

pay special attention, as relevant. This should also take into account the relative significance of the affected asset and the severity of the harm caused. Key consideration is also given to policy 38, 39 or 40 of Westminster's City Plan 2021.

Policy 38 Design Principles (A) states that new development will incorporate exemplary standards of high quality, sustainable and inclusive urban design....(B) respond to Westminster's context by positively contributing to Westminster's townscape and streetscape.

Policy 39 Westminster's Heritage: (C) states that the Outstanding Universal Value (OUV), authenticity and integrity of the Westminster World Heritage Site will be conserved and enhanced. The setting of the site will be protected and managed to support and enhance its OUV. (D) Development will protect the skyline, prominence and iconic silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance identified views out of, across and towards the World Heritage Site.

Para 39.7 states that the striking silhouettes and iconic views of the Palace of Westminster and Westminster Abbey contribute significantly to an understanding of its Outstanding Universal Value. The site's prominence and riverside location means that development at some distance, including outside the City of Westminster, can affect it. We will continue to work to protect views towards the site and its wider setting and ensure the cumulative impacts of development within its setting are understood and managed.

Part (K) Conservation Areas, states that development will preserve or enhance the character and appearance of Westminster's conservation areas. (L) goes on to state that there will be a presumption that unlisted buildings that make a positive contribution to a conservation area will be conserved.

Policy 40 Townscape and Architecture, states that (A) Development will sensitively be designed, having regard to the prevailing, scale, heights, character, building lines and plot widths, materials, architectural quality, and degree of uniformity in the surrounding townscape. (B) goes on to state that: Spaces and features that form an important element in Westminster's local townscapes or contribute to the significance of a heritage asset will be conserved, enhanced and sensitively integrated within new development.

Part (C) Extensive Developments; states that these will maximise opportunities to enhance the character, quality and functionality of the site and its surroundings, including creating new compositions and points of interest, and high-quality new streets and spaces, linked to the surrounding townscape to maximise accessibility.

Parar 40.5 goes on to explain that extensive development covers a large site area and has some independence of character which differentiates it from the surrounding townscape. Such sites are relatively uncommon in Westminster, and most are likely to be covered by site briefs or design guides providing further guidance. Where they do exist or become available, their potential to improve the quality and functionality of the area must be fully realised. A comprehensive and integrated approach to urban design will be required, including consideration of building layouts, creation of new public realm, streets and spaces, incorporation of landscaping and infrastructure to maximise the opportunities for positive change. Designs will build in capacity for future needs,

promoting legibility and ensuring good connections, while also taking into account the wider setting

Part (F) Westminster Views, states that new development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.

Whilst there is no statutory duty to take account of effect on the setting of a conservation area, Policy 39(K) in the City Plan 2019-2040 states that features that contribute positively to the significance of the setting of a conservation area will be conserved and opportunities will be taken to enhance conservation area settings, wherever possible.

Furthermore Chapters 12 and 16 of the NPPF require great weight be placed on design quality and the preservation of designated heritage assets including their setting. Chapter 16 of the NPPF clarifies that harmful proposals should be clearly and convincingly justified and should only be approved where the harm caused would be clearly outweighed by the public benefits of the scheme, including where appropriate securing the optimum viable use of the heritage asset, taking into account the statutory duty to have special regard or pay special attention, as relevant. This should also take into account the relative significance of the affected asset and the severity of the harm caused.

Westminster World Heritage Site

As identified in Section 7.1, the application site is located directly adjacent to the Westminster World Heritage Site (WHS).

The Outstanding Universal Value of the WHS is formed of the building, monuments, and places it encompasses, including the Palace of Westminster, Westminster Abbey, and St Margaret's Church. These are symbols of monarchy, religion, and power since their establishment in the 11th Century, and still play a pivotal role in society and government today.

The Outstanding Universal Value (OUV) of the WHS is the iconic silhouettes the buildings and monuments create, not only from across Westminster, but further afield. The site being directly adjacent to the WHS, features in both strategic viewing corridors and local views, namely those obtained from along Victoria Street, where the Abbey towers are gradually revealed in kinetic views as you move towards the site. There are also local views obtained from within the WHS, including Deans Yard, Parliament Square, The College Gardens, Abington Street Gardens and from within Westminster Abbey, which is particularly sensitive as any additional height and bulk will likely be apparent, and impact upon them.

Proposals

The proposed development intends to retain the existing two storey basement and replace the existing building from lower ground floor level in its entirety. Extending 140m along Victoria Street, the current building has a monotonous mass, which would benefit from having relief. It has a slender 'Z' plan form with an outrigger to the south. The

existing building's plan form doesn't fully utilize the site, leaving a considerable area of hard landscaping to the rear (south) of the building and east of the building, currently used for car parking, plant and servicing.

The floor plan of the replacement building extends to meet the eastern and southern boundaries of the site. Its height and bulk have been carefully modelled to avoid encroachment upon the protected viewing corridor from the Serpentine bridge (View 23A.1) and does not exceed 45.86m AOD. The building form has also taken into consideration local townscape views in order to avoid impairing the silhouette of the WHS, which is part of its Outstanding Universal Value, as well as views obtained from within the WHS. It is noted that the Thorney Island Society objects to the design of the building which they consider is not sufficiently good for this important site.

To provide visual relief and more animation, the Victoria Street façade has been developed to include terraces and chamfered edges which successfully break up the unyielding mass of the current building. External terraces with significant greening intend to occupy the setbacks, which will greatly improve the greening on Victoria Street, but also soften the building.

The geometry of the façade and its grid composition were initially developed around the retained frame of the building, but successfully introduce a greater depth and articulation to the facade. The combination of the tone and solidity of the precast stone is also more responsive to the building's context, and more respectful of the stone-faced buildings of the WHS. At its centre, the Victoria Street façade also features a double height colonnade, with fluted columns, which emphasise the principal entrance to the office accommodation. Following comments from Designing Out Crime officers, the colonnade was removed from the wider façade along Victoria Street, to avoid issues of anti-social behaviour.

The building plan has extended to infill the currently underutilised corner on Great Smith Street. The building's base at the eastern end of Victoria Street does present an increase in height when compared to the existing 1990s extension, though it has been reduced during pre-application discussions from four to three storeys to preserve a view of the Abbey Towers when viewed from Victoria Street.

Responding to the change in townscape character and architectural scale between Victoria Street and Abbey Orchard Street, the Great Smith Street façade features precast stone, which blends into brickwork, which is more complementary to the buildings along Great Smith Street and the Peabody Estate to the south. Similarly, the Abbey Orchard Street façade, whilst maintaining a grid form, is predominantly faced with brick, with the pre-cast stone sections featuring on the set back upper most floors. The base of the Abbey Orchard Street façade also features more solidity and a tighter grid, which is felt more complimentary to the character and residential scale of the Peabody Estate opposite.

The western flank of the building is largely faced pre-cast stone, and a continuation of the Victoria Street façade. A single brick bay negotiates the transition in character at the corner of Abbey Orchard Street.

Whilst the intention of the proposals is to optimise the massing on the site, its form,

particularly at its eastern end, has evolved to provide a strong 'Prow' corner, whilst seeking to enhance views of the World Heritage Site achieved from the west along Victoria Street. Architecturally the façade has evolved following officer advice and design review panel comments, to be more expressive, including recessed balconies and more vertical glazing. The result is successful without competing with adjacent buildings within the WHS. It is noted that Historic England welcome this architectural approach but that it is not supported by the Westminster Society or the Thorney Island Society.

Views

The development is undeniably larger than the existing building. Whilst the height has been managed to avoid infringing the LVMF viewing corridor from the Serpentine the development appears in a number of local views where it can be seen in the context of the WHS. The building will also appear more apparent from within the World Heritage Site.

A suite of verified views has been prepared to demonstrate the impact of the proposals in strategic and local views, and also upon heritage assets, namely their setting. The appreciation of the silhouette of the WHS in views, as well as views obtained from within the WHS, are fundamental to preserving its Outstanding Universal Value. Views obtained from within the adjacent conservation areas are also of importance in preserving their character and appearance.

Wider LVMF views include LVMF Views 22A.1, 22A.2 and 22A.3 from along Albert Embankment are not considered to be adversely affected as the development will be largely screened by buildings which lie within the middle ground of the view, within the setting of the Palace of Westminster. When viewed from the east, the development is fully concealed by the Palace of Westminster itself. As such these views are not considered to be affected by the proposals.

Similarly, LVMF View 18A.2 Westminster Bridge Upstream and 21A.1 Thames side in front of County Hall, will not be affected by the development, which will be fully concealed by buildings in the foreground.

In local views, the current building can be glimpsed in views from Victoria Tower Gardens but becomes more exposed when moving north to Abington Street Gardens. Much like the existing building, the development will be apparent in the background of these views, with the materiality of the development being the most perceptible change. That said the materiality of the development is more contextual and complementary and the changes to these views are not considered detrimental.

Looking westward within College Gardens the existing building appears above the historic roofscape of the properties in the background, namely those to Dean's Yard. The Westminster Society objects to this element of the proposed development. Whilst the height is comparable to the existing building the new alignment of the development along Great Smith Street makes the building more assertive than the existing. The development will alter this view but will not appear excessively imposing above the historic roofscape in the foreground. Again, the materiality of the development goes some way in counterbalancing its increased prominence. It should be noted that in the summer months the building will be entirely screened by the tree canopy within Dean's

Yard.

Much like the existing building, the development will be visible in the background of views from the Great Cloisters within the Abbey. The additional bulk is modest but balanced by its more contextual materiality. The development will appear as a secondary feature within the view, with the cloisters remaining the principal component. Again, in summer months the development will be largely screened by the mature treeline.

From within Dean's Yard the existing building can be glimpsed above the roofscape of the listed buildings which front its western side. Due to the development aligning along Great Smith Street, the building will appear in linear form and therefore more prominent above the roofscape. The darker tones of the upper most floors, and the materiality of the development go some way to ease its visual prominence. The development will diminish the setting of the listed buildings and views out of the WHS, causing a low level of less than substantial harm.

Within Parliament Square, at the junction of Bridge Street and Cannon Row, the current building and development are barely visible, screened by the Abbey and the treeline. Moving towards the southwestern end of Parliament Square the site becomes slightly more apparent at the junction of Broad Sanctuary and fully revealed at the junction of Little Sanctuary, where it is seen in the immediate setting of The Sanctuary (GII). Also in this view is Methodist Central Hall (GIISTAR), a notable building in the wider context of the site. Whilst the additional bulk presented by the base of the building at its eastern end is more apparent, overall, the development exhibits a more articulated and animated frontage, with a softer tonality and The Sanctuary maintains its prominence and appreciation in the view.

The view from along Victoria Street is a dynamic one. Moving eastward from Christchurch Gardens, along the northern side of Victoria Street, currently the Abbey Towers are gradually revealed creating a recognizable silhouette of the WHS, with the London Eye, Church of St Margarets (GI), and Elizabeth Tower in the background. The development will be a notable contributor to the foreground of these views.

The base component at eastern end of the building is marginally more assertive than the existing 1990s extension and would screen more of the lower parts of western flank of The Sanctuary. At the same time the scale and materiality of the base are aesthetically more complimentary when viewed alongside the WHS. The impact on the appreciation of The Sanctuary is not insignificant, and relatively low in terms of harm.

Due to its marginal increased height, the main bulk of the building conceals slightly more of the southern tower of the Abbey when seen from the most westerly views along Victoria Street (such as at the junction with Broadway). The further concealment of the southern tower is challenging, however, these most westerly views along Victoria Street do not provide a full appreciation of the iconic silhouette of the WHS, and therefore are less significant than those achieved from the east (between 10-4 Victoria Street) where the full silhouette of the WHS is revealed.

The modelling of the building has on the whole been handled sensitively to maintain the dynamic view achieved along Victoria Street, maintain a gradually exposure of the

Abbey Towers, with a meaningful sky-gap maintained between the Abbey Towers and the development. Consequently, the optimum view of the WHS (between 10-4 Victoria Street), is preserved, which is fundamental to sustaining the OUV of the WHS.

There are a number of local views from within the Westminster and Parliament Square, Peabody Estate: South Westminster; Broadway and Christchurch; and Birdcage Walk Conservation Areas. The development appears in a number of short views, but due to its design and materiality will not detract from them.

Assessment of harm

The development proposals have the potential to affect the setting of a number of listed buildings, conservation areas, and the Outstanding Universal Value of the World Heritage Site by detracting from its appreciation and recognisable silhouette within the City. A full suite of verified views has been prepared to support the application, and whilst these demonstrate that there are some modest changes to views, on the whole though the impact is largely neutral. The more challenging views are those obtained from within Dean's Yard and Victoria Street.

Within Dean's Yard, where the development will appear more prominent in the background of the roofscape. This effect of the setting of the listed buildings along the west side of Dean's Yard is considered on the low side of less than substantial harm. Historic England are also of the opinion that development visible from Dean's Yard and the Great Cloisters, would cause a small degree of incremental harm to the listed buildings that enclose these spaces, which should be taken into account in determining the application in line with national planning policy.

The partial concealment of the western flank of The Sanctuary, and southern tower of the Abbey, when viewed from Victoria Street from the west, will modestly diminish their appreciation but will not harm the Outstanding Universal Interest of the World Heritage Site, a view supported by Historic England.

In accordance with para 208 of the NPPF, the harm identified is considered adequately balanced by the wider benefits of the proposals which are set out in Section 9.11.

Design Review Panel Response

Westminster's Design Review Panel reviewed the proposals at pre-application stage in October 2023.

The panel considered the height and bulk of the development generally acceptable but felt the corner could be strengthened, and the façade broken up through materiality and its horizontal and vertical emphasis.

In response, whilst still taking into consideration the views of the World Heritage Site, adjustments were made to the stepping and arrangement of the façade as well as the horizontal and vertical emphasis subtly changed across the Victoria Street façade. In relation to strengthening the corner, recessed balconies have been introduced within double and triple height expressions in the façade.

The panel also made comments and suggestions in relation to the public realm at the eastern corner of the site, and the introduction of more public realm and greening across the site and building. The public realm provision at the eastern corner, which includes planting and seating, has modestly evolved during the course of the pre-app. Further greening has however been introduced to the ground plane, including trees to Abbey Orchard Street and planting along sections of Victoria Street. Meaningful greening to the terraces has been optimised and a planting strategy developed.

A copy of Westminster's Design Review Panel report is provided as background paper number 23.

Fire Safety

London Plan policy D12 states that, 'In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.' A fire statement has been submitted with the planning application which has been prepared by Chartered Engineer at Arup who leads up Arup's fire engineering team, i.e. a suitably qualified assessor, as required by Policy D12 and the Fire Safety draft LPG.

The submitted Fire Statement is in accordance with the requirements of London Plan Policies D5 and D12 and it is recommended it is secured by condition.

Landscaping & Public Realm

Policy 43 of the City Plan states that 'Development will contribute to a well-designed, clutter-free public realm with use of high quality and durable materials capable of easy maintenance and cleaning, and the integration of high-quality soft landscaping as part of the streetscape design'

The landscaping strategy seeks to introduce greenery on Victoria Street and Abbey Orchard Street which currently do not offer any greenery. The building footprint has been set back (at ground floor level along Victoria Street) to accommodate the raised planters, rain gardens and tree planting proposed.

The eastern entrance space is the key open area at ground floor given its prominent position. In this location (at the corner of Victoria Street and Great Smith Street) there will be a hard landscaped area of new public realm (also called a pocket park) with raised planters and bench seating. Part of the pocket park would extend under the 'Prow' of the proposed building. The Westminster Society considers that this area of public realm should be more generous and questions the need for an overhanging balcony. Whilst the Society's comments are noted, overall the size of the pocket park is considered acceptable. The overhanging element is not objected to and is a feature that can be found on other buildings on Victoria Street.

Along Great Smith Street it is proposed to set the building back by 1.12m from the existing site ownership line to allow for more space for pedestrians around. On Abbey Orchard Street the building line is set back and tree planting and a rain garden introduced

The landscaping and public realm enhancements are welcome in policy terms and would improve the pedestrian environment around the proposed building and the biodiversity of the application site. It is recommended that public access over the new public space at the eastern end of the building is secured by a Walkways Agreement as part of the S106 agreement.

The application is supported by a Wind Microclimate Assessment. This concludes the proposed development would not materially alter wind conditions at ground level, as the proposal is of a similar height to the surrounding environment. It also concludes that wind conditions at ground level would be suitable for pedestrian uses.

Archaeology

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the City Plan. Although this is a major development within an Archaeological Priority Area and close to the Westminster World Heritage Site Historic England agree with the applicant's archaeological desk-based assessment that exceptionally in this case there will be no archaeological impact because the 1960s basements will have removed all archaeological deposits. No further assessment or conditions are therefore necessary. The proposal complies with Policy 39(O) of the City Plan.

9.5 Residential Amenity

The City Council places high priority on protecting residential amenity, with City Plan Policy 7(A) stating that development will be neighbourly by, 'Protecting and where appropriate enhancing amenity, by preventing unacceptable impacts in terms of daylight and sunlight, sense of enclosure, overshadowing, privacy and overlooking'. City Plan Policy 33(A) states, 'The council will make sure that quality of life and health and wellbeing of existing and future occupiers, and the natural environment are not adversely affected by harmful pollutants and other negative impacts on the local environment'.

At the national level, Paragraph 130 of the NPPF refers to the need to secure a high standard of amenity for all existing and future occupants of land and buildings. London plan policy D6(D) states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst minimising overshadowing and maximising the usability of outside amenity space.

Daylight & Sunlight

The commonly accepted methodology for assessing the impact of development proposals upon daylight and sunlight is the Building Research Establishment guidance entitled, 'Site layout planning for daylight and sunlight: a guide to good practice' (the BRE Guidelines). The third edition of this guidance was published in 2022. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the site.

Daylight

The most commonly used BRE method for assessing daylighting matters is the 'vertical

sky component' (VSC), which measures the amount of sky that is visible from the outside face of a window. Using this method, if an affected window is already relatively poorly lit and the light received by the affected window would be reduced by 20% or more as a result of the proposed development, the loss would be noticeable and the adverse effect would have to be taken into account in any decision-making. The BRE Guidelines seek to protect daylighting to living rooms, kitchens and bedrooms. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices.

Where the layout of affected room is known, the daylight distribution test can plot the 'no sky line' (NSL) which is a point on a working plane in a room between where the sky can and cannot be seen. Comparing the existing situation and proposed daylight distributions helps assess the likely impact a development will have. If, following construction of a new development, the no sky line moves so that the area of the existing room, which does not receive direct skylight, is reduced to less than 0.8 times its former value, this is likely to be noticeable to the occupants.

Sunlight

With regard to sunlighting, the BRE Guidelines state that rooms will appear reasonably sunlit provided that they receive 25% of annual probable sunlight hours, including at least 5% of winter sunlight hours. A room will be adversely affected if this is less than the recommended standards and reduced by more than 20% of its former values, and the total loss over the whole year is greater than 4%. Only windows facing within 90 degrees of due south of the proposed development need to be tested.

Assessment

The applicant has submitted an assessment of the impact of the increase in height and bulk of the proposed development upon the amount of sunlight (the Annual Probable Sunlight Hours), daylight (VSC) and the distribution of that daylight within affected rooms (NSL) to residential properties within the vicinity of the site. The Daylight and Sunlight Assessment assesses 15 properties within the vicinity of the site. Of these, four are residential properties, seven are commercial properties, three are mixed-use properties and one is an education property. A summary of the results for each property for VSC, NSL and sunlight are provided in Appendix 1.

The buildings that have been assessed are as follows:

Commercial

- 10-18 Victoria Street
- 20 Victoria Street
- 4A Deans Yard
- Sanctuary Buildings, Great Smith Street
- 1 Abbey Orchard Street / 25-27 Victoria Street
- 2-8 Victoria Street,
- 5-8 The Sanctuary

Mixed Use

- 8-10 Broadway
- 3 & 3A Deans Yard
- Luke House Abbey Orchard Street

Residential

- 4B and 5 Dean's Yard
- 3B Deans Yard
- 4 Deans Yard
- Abbey Orchard Street Estate

Educational

- Westminster Abbey Choir School

Commercial

The results of the analysis of the impact of the proposals demonstrate that for the seven commercial office buildings assessed the overall daylight and sunlight impact would be negligible. Office uses are of low sensitivity in terms of the BRE Guidelines and normally rely heavily on artificial lighting. The impact from the proposed development in terms of daylight and sunlight would not prejudice the future use of these buildings as commercial offices and is acceptable.

Mixed use

8-10 Broadway (part of the New Scotland Yard redevelopment site) is mixed-use with residential units on the fourth floor and upwards. Two windows that do not meet the BRE Guidelines' target value for VSC are located on the first floor and serve office space. However as this space contains other windows, the impact to the room overall would be negligible. Furthermore as set out above, office uses are of low sensitivity in terms of the BRE Guidelines and normally rely heavily on artificial lighting

For the residential use, the assessment shows that one living/kitchen/dining room on the fourth floor would experience a 44% reduction in NSL (an impact of large magnitude) However, this room retains very high levels of VSC for the dense surrounding urban context (in excess of 28% VSC in absolute terms) and whilst not fully compliant with the BRE Guidelines, the impact is acceptable.

3 and 3A Deans Yard is of mixed-use with a residential unit on the upper floors. The assessment indicates that the residential unit on the upper floors would meet BRE criteria in terms of VSC, NSL and sunlight. The windows that experience larger reductions in excess of the BRE criteria for VSC are on the lower ground and ground floors and for NSL are on the lower ground to second floors which the applicant advises are in non-residential use. In addition the assessment refers to an overhanging obstruction for three windows which also appear to serve circulation spaces. The daylight losses to the lower floors are acceptable given the generally good VSC results and the fact that the affected windows appear to serve a non-residential use. The two windows that do not meet the BRE sunlight criteria are located on the first and second floors where the applicant advises, a residential address is not listed.

Luke House, Abbey Orchard Street is of mixed-use with residential units on the fifth floor upwards and commercial use on the lower floors. The assessment undertaken shows all

residential windows would meet BRE criteria in terms of VSC and NSL Two rooms which experience reductions of more than 20% in NSL are of commercial use and experience small to medium impacts. Given the commercial use uses is of low sensitivity in terms of the BRE Guidelines and would be expected to rely heavily on artificial lighting, this is acceptable. In terms of sunlighting, the one south-facing room overlooking the site in this building complies with the BRE Guidelines.

Residential

4 and 5B Dean's Yard is understood to be within residential use. The assessment undertaken shows that the windows assessed meet the BRE criteria in terms of VSC, NSL and sunlight.

3B Dean's Yard is understood to be within residential use. In terms of VSC the proposal would meet the BRE Guidelines with the exception of one window which would experience a 22% reduction. However, the assessment sets out that this room is likely to be served by two additional windows such that the weighted mean VSC reduction is 15% i.e. a negligible impact to the room as a whole. For NSL, four rooms experience reductions of between 20.1% and 30%, six rooms experience reductions of between 30.1% and 39%, and one experiences a 42% reduction i.e. small to large impacts. However the assessment states that given the external appearance of the windows affected, it is likely that most of the windows facing the proposed development site serve a staircase and bathrooms which do not need to be assessed under the BRE Guidelines. In terms of sunlight all south facing rooms meet the BRE Guidelines.

4 Deans Yard is understood to be within residential use. In terms of VSC the proposal would meet the BRE Guidelines. However three rooms would experience 21% to 24% reductions in NSL beyond that recommended by the BRE Guidelines. Given the urban context and that windows serving these rooms meeting the VSC target, the impact is acceptable. A sunlight assessment is not required for this property due to its orientation.

Abbey Orchard Street Estate

This housing estate is entirely of residential use and so of high sensitivity to daylight and sunlight. The Thorney Island Society are concerned about loss of light to the Abbey Orchard Estate (Peabody Buildings).

Blocks A, B, H & K have been considered within the Daylight and Sunlight Assessment. The plans of the estate obtained by the applicant show that the windows facing the proposed development predominantly serve bathrooms, circulation space or small kitchens, with the remaining rooms being bedrooms.

The assessment undertaken shows 76 out of 196 (38.8%) windows assessed would comply with the BRE Guidelines in terms of VSC. These windows include all windows within Blocks H & K. The remaining affected windows are in Blocks A and B.

68 of the remaining 120 windows serve what is classified as non-habitable space i.e. bathrooms (53 no.) and circulation space (15 no.) and according to BRE Guidelines do not need to be assessed. The remaining 52 windows affected serve kitchens (30 no.) and bedrooms (22 no.). The affected kitchen windows in Blocks A and B which have been assessed by the applicant are understood to be small measuring between 9 sqm

and 12 sq. m in size. The Mayor of London Supplementary Planning Guidance states in para 1.3.19:

“In some circumstances, a large kitchen or kitchen/dining room may be counted as a habitable room but the approach varies between boroughs. There is no statutory definition for kitchens to be counted as a habitable room nor is there any statutory size threshold. Many boroughs, however, include a figure of between 13 and 15 square metres in LDFs: any kitchen above that minimum is usually counted as a habitable room. Generally, a kitchen with a small table and chairs in one corner, or a kitchen ‘bar’ would not be counted as a habitable room. A room with a clearly defined kitchen at one end and a clearly defined dining area at the other (with a dining table and chairs) would be counted as a habitable room.”

Whilst the City Plan does not define a habitable room in its glossary, the small size of the kitchens identified means that they are unlikely to be used for anything other than cooking as there would be limited room for a table. On this basis it could be argued that these rooms have less sensitivity than other habitable rooms in the flats. Whilst the residents are likely to notice the reduction in daylight to the affected kitchens, given that they could be considered non-habitable, the impact is acceptable.

The remaining 22 affected windows in Blocks A and B serve bedrooms. The impact in terms of VSC and NSL is shown in the tables in Appendix 2. All but four of these windows experience a reduction in VSC of less than 30%. The final four, located on the ground and first floor, experience VSC reductions of between 32% and 36%. Given that these windows are located on the ground and first floors, their existing levels of VSC are lower (c.14% - 16% VSC) and therefore, while the absolute reductions in VSC are around 5%, the relative reduction appears greater. In terms of NSL, 7 windows will see reductions in between 50 and 52.2% and 5 windows will see reductions between 41.2 and 49.4% which is a large impact. 3 windows will see reductions between 33.2% and 35.8% (a medium impact) and 2 windows reductions of 21.6% and 22.7%. (a small impact)

The reduction in daylight to 22 affected bedroom windows would be noticeable to the occupants. However, the affected windows serve bedrooms where daylight is less critical than living rooms. It is understood from plans provided by the applicant that that the living rooms within these blocks face south over a landscaped courtyard, in the opposite direction to the application site and so will be unaffected by the proposed development. For both the affected kitchen and bedroom windows within Blocks A and B, the outlook from the proposed windows would be improved. Currently these windows look out over the unsightly security fencing and servicing yard of the existing building. The proposed development would improve both the streetscape along Abbey Orchard Street and the outlook from these residential windows. No objections have been received from the occupants of the Abbey Orchard Street Estate.

Westminster Abbey Choir School

The Westminster Abbey Choir School is located at Dean’s Yard to the east of the proposed development. The assessment sets out that it is not clear as to where the boundaries of the School fall and, for the purposes of the Daylight and Sunlight Assessment, only the block labelled as the School has been considered to be used as education space. The assessment undertaken shows that for VSC all windows within

this building would meet the BRE criteria. For NSL, 14 out of 25 (56%) rooms assessed would meet the BRE criteria. The use of the remaining eleven rooms is not known. Eight experience small impacts and three experience medium impacts. Given the good VSC results and the daylight distribution impacts not being significant losses, the overall effect on daylight at this building is acceptable. The windows assessed comply with BRE criteria in terms of sunlight.

Sense of Enclosure

Paragraph 7.3 of the City Plan states that, 'Even when there may be no material loss of daylight or sunlight, new developments should prevent unacceptable increases in the sense of enclosure'

The existing building has extensive, open service yards and vehicle access lining the frontage to Abbey Orchard Street. The applicant is seeking to optimise the site by infilling the service yards and extending the existing building mass to the south to align with Abbey Orchard Street. This will enhance the outlook for residents within the Abbey Orchard Estate that overlook the south elevation of the site. However, in order to minimise the impact on these residential neighbours, the massing of the proposed development is stepped back at upper levels on Abbey Orchard Street. The set-backs allow for the provision of terraces at upper levels to provide outdoor space for building users and opportunity for urban greening.

Part of the ground floor building line on Abbey Orchard Street is also set back. This is located immediately in front of Blocks A and B of the Abbey Orchard Street Estate. The set back allows a separation distance of 18m and for the introduction of soft landscaping and tree planting. Further set backs are then introduced at fourth to ninth floor levels.

Whilst there is a significant massing increase on Abbey Orchard Street this has been done in a sensitive way with the tiered architectural approach adopted. The residents of Abbey Orchard Street that overlook the site will notice a significant change in outlook, however, there are benefits to this approach as the unattractive service yard and security fencing will be replaced by a building that follows a more conventional street pattern. The impact on residents is also mitigated by the layout of the estate buildings with living rooms at the rear overlooking a semi private landscaped courtyard with kitchens, bedrooms and bathrooms facing Abbey Orchard Street. Overall the impact in terms of sense of enclosure to Abbey Orchard Street is acceptable.

Privacy

Paragraph 7.3 of the City Plan sets out that, 'Positioning, scale and orientation of buildings as well as the incorporation of design measures should be considered to minimise overshadowing and overlooking and ensure adequate levels of privacy.'

The stepped form of the building allows for terraces on Abbey Orchard Street at fourth floor level upwards for the office users. At fourth floor level the terrace would be approximately 18m from street facing windows in the Abbey Orchard Estate. With appropriate screening on the terraces (secured by condition) acceptable levels of privacy could be maintained. However in order to fully protect residential amenity a condition is recommended to limit the hours of use of the terraces that face exclusively onto Abbey

Orchard Street and Great Smith Street to normal offices hours only, namely 8am to 7.30pm Monday to Friday. The other roof terraces would face Victoria Street and the corner of Victoria Street / Great Smith Street and these are less sensitive to noise outbreak. Nevertheless it is still appropriate to control the hours of use of these other terraces by condition to 9am to 10pm daily. As with most new terraces for offices, their use will be restricted to the use of office occupiers only (in case the use were to change to another use within Class E at a future date), as well as preventing the playing of live or recorded music.

Noise & Vibration

The proposals include screened external mechanical plant areas at seventh, ninth and main roof level. Policy 33(B) Local environmental impacts and the Environmental Supplementary Planning Document Adopted 2022 (ESPD) seek to prevent noise nuisance. The application submission included a noise assessment which is being assessed by Environmental Sciences. If no objections are raised to the proposals it is recommended that our standard noise conditions are attached.

9.6 Transportation, Accessibility & Servicing

Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion, which also contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel.

London Plan policy T1(B) encourages development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

London Plan Policy T2(D) requires that development proposals should demonstrate how they would deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

London Plan policy T4 requires transport assessments submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.

Relevant Council policies in this case are Policy 24. Sustainable transport, Policy 25. Walking and cycling, Policy 26. Public transport and infrastructure, Policy 27. Parking, Policy 28. Highway access and management. Policy 29. Freight and servicing, and Policy 37(B).

The planning submission is accompanied by a Transport Assessment.

Highway Impact

The development promotes sustainable transport by prioritising walking and cycling which is welcome.

The proposal has an off-street loading bay from Abbey Orchard Street. Vehicles will enter and exit the off-street servicing bay in a forward gear. This facility is supported by Highways Planning.

The existing site has 113 marked car parking space located at basement level and accessed from Abbey Orchard Street. In line with City Plan policy 27 the proposed development will be car free which is welcome.

Long-stay cycle parking and support facilities (showers and lockers) are proposed at lower ground floor level. Short stay cycle parking is provided along Victoria Street, Abbey Orchard Street and within the building itself.

The trip generation information for the office use is accepted. However the Highways Planning Manager advises that limited information has been provided for the medical, leisure and restaurant Class E uses and he is concerned that the operation of these proposed flexible Class E retail uses may have an adverse impact on the operation of the highway. The applicant advises that retail uses, which in the original application were assumed to have all linked trips, have now been assessed within the resubmitted application. This information is with the Highways Planning Manager for assessment.

Accessibility

The proposed development seeks to enhance the pedestrian experience by providing an enhanced environment on Victoria Street with landscaping along the frontage and the new public realm area at the 'Prow' of the building. Great Smith Street is proposed to benefit from a localised footway widening to alleviate potential pedestrian congestion around the bus stop. Abbey Orchard Street would benefit from a reinstated building line and landscaping.

The three existing crossovers of the northern footway of Abbey Orchard Street which accommodate access to the on-site waste store, service yard, and car parking are proposed to be reinstated as footway. This is welcomed and considered an improvement for pedestrians and other highway users.

In accordance with the GLA's policies regarding healthy streets, walking and vision zero, an active travel zone (ATZ) assessment has been undertaken (day and nighttime), reviewing routes to key destinations against the 10 Healthy Streets indicators. TFL notes that the routes chosen are acceptable. The ATZ has provided some commentary on the worst affected parts of each route and potential improvements identified. TfL advise that there are some areas for improvement where TfL would support the Council in seeking developer contributions for delivery of these in line with London Plan Policy T2. Whilst this is noted it is not considered this is reasonable in this instance.

Cycle Parking

A total of 942 cycle parking spaces are proposed.

853 long-stay spaces are proposed together with support facilities (showers and lockers) at lower ground floor level. The cycle parking spaces will be a mix of two-tier racks, accessible and oversized spaces. The Highways Planning Manager has queried whether the figure should be 858, however, TFL advise that the proposed number of spaces is compliant with London Plan Policy T5. On balance the number of cycle parking spaces is acceptable. The cycle stores will be accessed from Abbey Orchard Street, which will provide a dedicated segregated cycle entrance.

89 short-stay cycle parking spaces are proposed with 26 of these spaces, which would serve the office use, to be provided within a mezzanine basement level within the building. The remaining spaces will be distributed around the site within the site's demise. The quantum and location of short stay cycle parking is acceptable. A condition is recommended to secure a management plan to ensure visitors are aware of where the short stay parking is and how to access it.

Servicing and Waste & Recycling Storage

City Plan policy 29 requires servicing and deliveries to be fully met within a development site and freight consolidation. Freight consolidation is a key aspect of supporting wider Net Zero climate and air quality strategies. A Delivery and Servicing Plan (DSP) has been submitted with this application which sets out a number of objectives including:

- Minimise the impacts of freight movements and facilitate sustainable freight travel to and from the proposed development.
- Promote smarter operations that reduce the need for freight travel overall or that reduce or eliminate trips particularly in peak periods
- To identify ways to reduce delivery numbers, employ out of hours deliveries and consolidate goods wherever possible.
- Encourage the use of greener vehicles

The development is estimated to generate 177 delivery and servicing trips a day. This is an increase of approximately 89 daily delivery and servicing trips. The applicant has sought to mitigate the overall impact of additional vehicle trips using physical and virtual consolidation measures. These are set out in the DSP submitted and include a delivery booking system managed by the Facilities Management, waste collection consolidation and collective procurement. These measures are welcome. It is recommended that the Delivery and Servicing Plan is secured by condition.

The expectation is that cargo bikes will delivery directly to the retail units. The applicant has updated the submitted plans by identifying dedicated cargo bike spaces within the loading area, which are located away from the loading bays.

Based on the information submitted with the application, the applicant has not demonstrated that all of the range of uses within Class E would not have a detrimental impact on the highway or highway users. It is therefore considered to be appropriate to restrict the use of the building to the uses sought (also considered necessary in land use

terms to meet other policy objectives): this would mean that a revised Servicing Management Plan could be sought in the event that alternative uses were applied for at a future date.

Waste storage requirements have been developed in line with Westminster's waste guidance. Waste collection will take place from the rear servicing yard. The bay provision can accommodate a refuse vehicle. The Waste (Project) Officer is satisfied with the details submitted.

The Highways Planning Manager has requested that an EV charging point be installed in the loading bay for electric delivery vehicles. This has not been pursued by the applicant due to an increased fire risk that EV charging presents.

Highway Works

Space is proposed to be dedicated to public highway along the southwestern façade of the site, fronting Abbey Orchard Street, as well as part of the eastern façade fronting Great Smith Street. In each case, this would provide for improved footway width. This proposed dedication of land would serve to partially ease congestion at a key pedestrian pinch point at the bus stop on Great Smith Street. The applicant advises that this area would total 108sqm of additional new public highway, proposed to be dedicated. No stopping up of existing public highway is proposed. It is recommended that these measures together with all highways works immediately surrounding the site required for the development to occur are secured through a S106 legal agreement.

9.7 Economy including Employment & Skills

Relevant City Plan Policies are Policy 1. Westminster's Spatial Strategy, Policy 13. Supporting Economic Growth, Policy 18(D). Education and skills and Policy 19. Digital infrastructure, information and communications technology.

City Plan Policy 18(D) states, "Major developments will contribute to improved employment prospects for local residents. In accordance with the council's Planning Obligations and Affordable Housing SPD, this will include:

1. financial contributions towards employment, education and skills initiatives; and
2. for larger schemes, the submission and implementation of an Employment and Skills Plan".

The Planning Obligations and Affordable Housing SPD (adopted March 2024) sets out how developments proposing a net increase in commercial floorspace of over 10,000 sqm will be required to make a financial contribution and to produce an Employment and Skills Plan. Based on the formula within the guidance note, the proposed development would be liable to make a financial contribution of £402,406.66 to support the Westminster Employment Service (payable prior to the commencement of development). This financial contribution would be secured by legal agreement.

The proposed development will contribute to the economy of Westminster and to this part of the CAZ in accordance with Policies 1 and 13 in the City Plan 2019-2040 through economic, job and training benefits as set out below.

The headline socio-economic impacts set out by the applicant as part of their submission include:

- 10, 782 sqm (GIA) uplift in office floorspace.
- £8.0m expenditure by construction workers in the locality;
- Up to £12.3m additional worker expenditure annually in operation;
- Up to £566m in total economic output (GVA) supported at the Proposed Development.
- Up to £12.1m uplift in business rates payments with up to £3.6m to accrue to WCC for local spend.

Jobs benefits of the scheme including:

- 1,020 construction jobs supported for the 3 years of construction;
- an uplift of between 1,080 -1,940 jobs (990 -1,760 FTE's) arising from the proposed development;
- Up to 195 new jobs expected to be taken up WCC residents.

Training benefits to be delivered by the scheme including:

- 51 work placements for residents aged 14-19;
- 51 work placements for residents aged 19;
- 113 local jobs and apprenticeships; and
- 39 curriculum support activities.

A draft Employment and Skills Plan has been submitted with this application which could be secured as part of the S106 agreement. The plan is subject to ongoing discussions with our Economy and Skills Team.

Digital Infrastructure & Connectivity

The applicant has confirmed that the building has been designed to enable full fibre connectivity in line with London Plan Policy SI6.

9.8 Other Considerations

Crime and Security

The applicant has been in discussions with the Metropolitan Police Service (Designing Out Crime Officers) who have no objections to the proposals. However, at their request a condition is proposed requiring that the scheme achieves Secured by Design Accreditation.

Construction Impact

The City Council's adopted Code of Construction Practice (CoCP) sets out the standards and procedures to which developers and contractors must adhere to when undertaking construction of major projects. This will assist with managing the environmental impacts identified in the ES and will identify the main responsibilities and requirements of developers and contractors in constructing their projects. This will ensure that the site would:

- be inspected and monitored by the City Council's Code of Construction Practice

Team

- undertake community liaison, informing neighbours about key stages of the development and giving contact details for site personnel
- pay the charges arising from site inspections and monitoring
- ensure that contractors and sub-contractors also comply with the code requirements.

The CoCP will require the developer to provide a bespoke Site Environmental Management Plan (SEMP) which will need to be approved by the City Council's Environment Inspectorate team. This would need to include site construction logistics, working hours, environmental nuisance, identification and description of sensitive receptors, construction management, matters relating to dust, noise and vibration from works and local community liaison.

Construction is anticipated to be undertaken over an approximate 3 year programme.

TfL has raised some issues regarding the impact of construction works on their infrastructure such as bus stops on Victoria and Great Smith Streets and the cycle hire docking station on Abbey Orchard Street. An informative is recommended to advise the applicant to liaise with TfL on these matters.

Procedural

The application is referable to the Mayor of London under Category 1C of Part 1 of the Schedule of the Town and Country Planning (Mayor of London) Order 2008. The Deputy Mayor considers that the application complies with the London Plan for the reasons set out in the Strategic planning application stage 1 report dated 5 April 2024. (provided as a Background Paper) and pursuant to Article 5(2) of the Order, the Mayor does not need to be consulted again. The City Council may therefore proceed to determine the application without further referral to the Mayor.

9.9 Environmental Impact Assessment

The applicant has carried out an Environmental Impact Assessment (EIA) of the development. EIA is a formal procedure underpinned by The Town and Country Planning (EIA) Regulations, 2017 (as amended). The EIA process systematically identifies and assesses the likely significant environmental effects of a development and the results are reported in an Environmental Statement (ES).

Environmental Impact issues have been covered in Section 9.4 (Townscape, Design and Heritage Impact), Section 9.5 (Daylight and Sunlight), Section 9.2 (Environment and Sustainability) and Section 9.8 (Construction Impact)..

In putting forward this recommendation, officers have taken into account the ES submitted. Officers are satisfied that the environmental information as a whole meets the requirements of The Town and Country Planning (EIA) Regulations, 2017 (as amended) and that sufficient information has been provided to enable assessment of the environmental impact of the application. The likely significant measures identified in the ES for the proposed development are:

Heritage - During construction, there would be effects on the ability to appreciate the heritage significance of designated heritage assets in the area closest to the Site. The ES concludes these 'significant adverse' effects would be temporary and short-term, direct and local.

Noise and Vibration - Temporary likely 'significant adverse' effects due to construction noise are identified at Blocks A and B, Peabody Estate, Abbey Orchard Street during 10 out of 12 phases of demolition, retention and construction works, and at residential and commercial external amenity of 3-4 Abbey Orchard Street during 9 out of 12 phases of the demolition, retention and construction works.

Socio Economics - Once complete and operational, the proposed development is anticipated to have 'significant beneficial' effects on local jobs and skills, contribution towards commercial floorspace and provision of public realm and activation of frontages.

Townscape and Visual – the ES identifies 'significant beneficial' impact to Victoria Street, Westminster WHS and environs, environs to the south of the site and views from Dean's Yard, United Nations Green, Great Smith Street, Abbey Orchard Street and Victoria Street.

The 'mitigation measures' to be implemented to address the likely environmental impacts of the development are:

- Implementation of a Site Environmental Management Plan (SEMP) to manage environmental controls and ensure good working practices. Measures will be employed as appropriate to reduce any impacts arising from dust, along with guidance on what monitoring should be undertaken during the construction phase.
- Measures to reduce the effects of noise during construction will include screening, siting of construction plant away from sensitive receptors, adhering to agreed working hours and community liaison.

It is recommended that construction impact mitigation measures are secured by our standard condition for developments of this scale whereby the applicant, or any other party, will be required to submit evidence to demonstrate they will be bound by the council's Code of Construction Practice. (See Section 9.8 – Construction Impact)

9.10 Planning Obligations & Pre-Commencement Conditions

The Town and Country Planning (Pre-commencement Conditions) Regulations 2018 requires the City Council to obtain the applicant's written agreement before imposing pre-commencement conditions (i.e. conditions which must be discharged before works can start on site) on a planning permission. Pre-commencement conditions can only be imposed without the written agreement of the applicant where the applicant fails to provide a substantive response within a 10-day period following notification by the Council of the proposed condition, the reason and justification for the condition.

During the course of this application a notice was served relating to the proposed imposition of a pre-commencement condition to secure the applicant's adherence to the City Council's Code of Construction Practice during the demolition/excavation and

construction phases of the development. The applicant has agreed to the imposition of the condition.

9.11 Assessment of Planning Balance

As set out within Section 9.4, the proposal is considered to cause less than substantial harm to the setting of the Westminster Abbey and Parliament Square Conservation Area and to the identified listed buildings and their settings. The harm would be caused by the new alignment of the proposed development along Great Smith Street which makes the proposed building more assertive than the existing. The level of harm caused would be at the lower end of less than substantial.

Paragraph 208 of the NPPF states that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the 'public benefits' of the proposal, including optimising its optimum viable use. 'Public benefits' could be anything that delivers economic, social or environmental progress as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits.

When undertaking this weighing exercise, the Sub-Committee must fulfil its statutory duties within Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as set out within Section 9.4 of this report) and give great weight to the conservation of heritage assets, irrespective of the degree of harm. Any harm needs to be clearly and convincingly justified.

Although a development of this scale generates a number of public benefits, the following are considered to be the most significant:

- the introduction of a more contextual and visually attractive building within the setting of the WHS;
- improvements to Victoria Street with the introduction of a more active and animated ground floor frontage
- townscape improvements to Abbey Orchard Street by reinstating the building line and urban greening;
- a substantial contribution towards the City Council's growth policy objectives and targets within the CAZ with the delivery of over 59,432sqm (GIA) of new Grade A office floorspace (a net uplift of 10,782sqm (GIA));
- the provision of circa 2,405 sqm (GIA) of Affordable Workspace;
- the delivery of 5,961 sqm (GIA) of new flexible retail floorspace contributing to the City Council's economy;
- Other economic and training benefits set out in this report arising from the construction and operation phases of the scheme.
- A significant biodiversity net gain on the site.

The public benefits identified in Sections 9.1, 9.4 and 9.7 and summarised above would be significant. Consequently, they are considered to be sufficient to outweigh the less than substantial heritage harm, in compliance with paragraph 208 in the NPPF.

Furthermore, the heritage harm has been kept to the minimum necessary to deliver the proposed development and the public benefits that flow from it. For these reasons, clear and convincing justification has been demonstrated for the harm caused to the designated heritage assets, in compliance with paragraph 206 of the NPPF.

10. Conclusion

This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has also considered the weight to be attributed to the public benefits and harm that would arise from the scheme. Having regard to this assessment, it has found that the proposed development is acceptable.

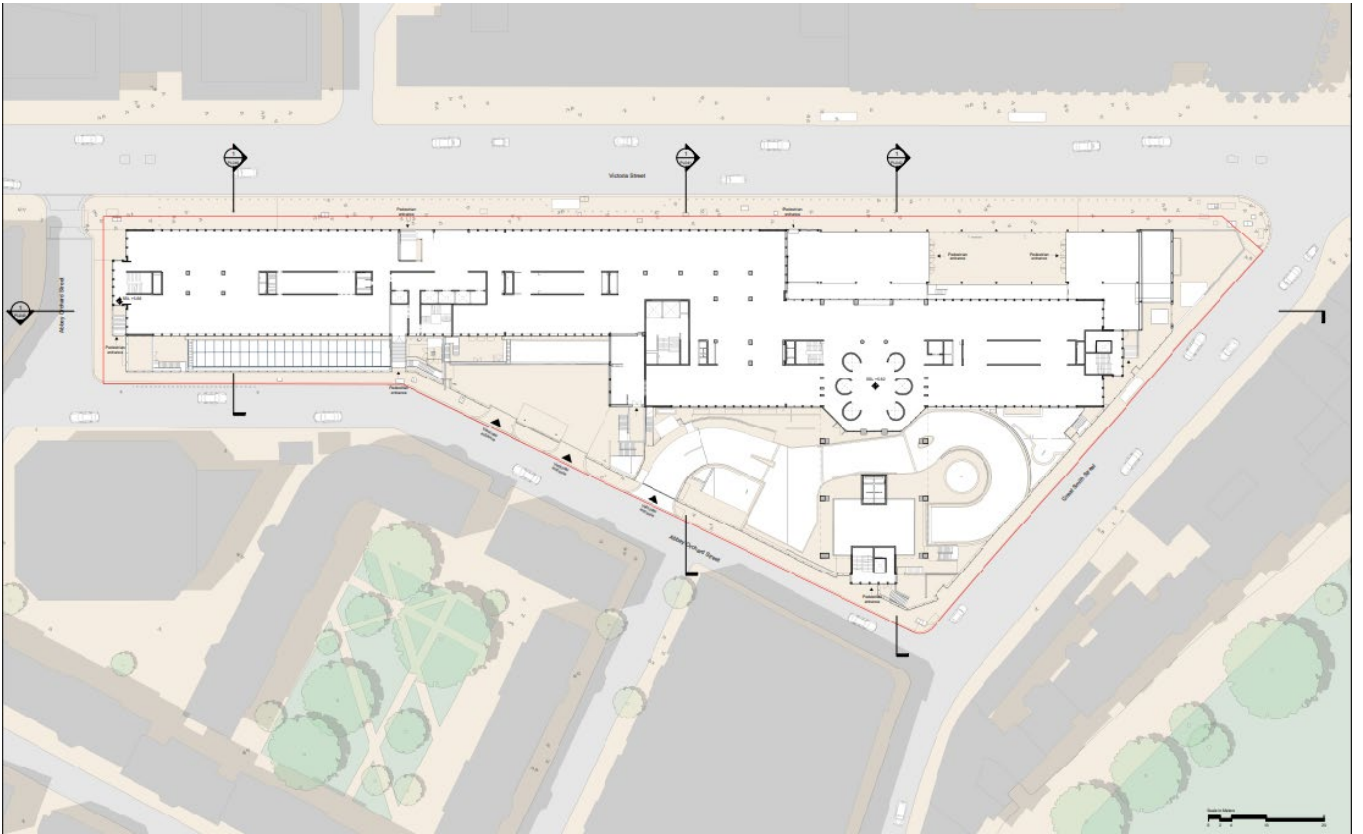
Accordingly, the proposed development would be consistent with the relevant policies in the City Plan 2019-2040, the London Plan 2021, the requirements of the NPPF and the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is recommended that planning permission is granted, subject to the conditions listed at the end of this report and completion of a Section 106 agreement to secure the obligations identified in Sections 1 and 9.10, which are necessary to make the development acceptable.

(Please note: All the application drawings and other relevant documents and Background Papers are available to view on the Council's website)

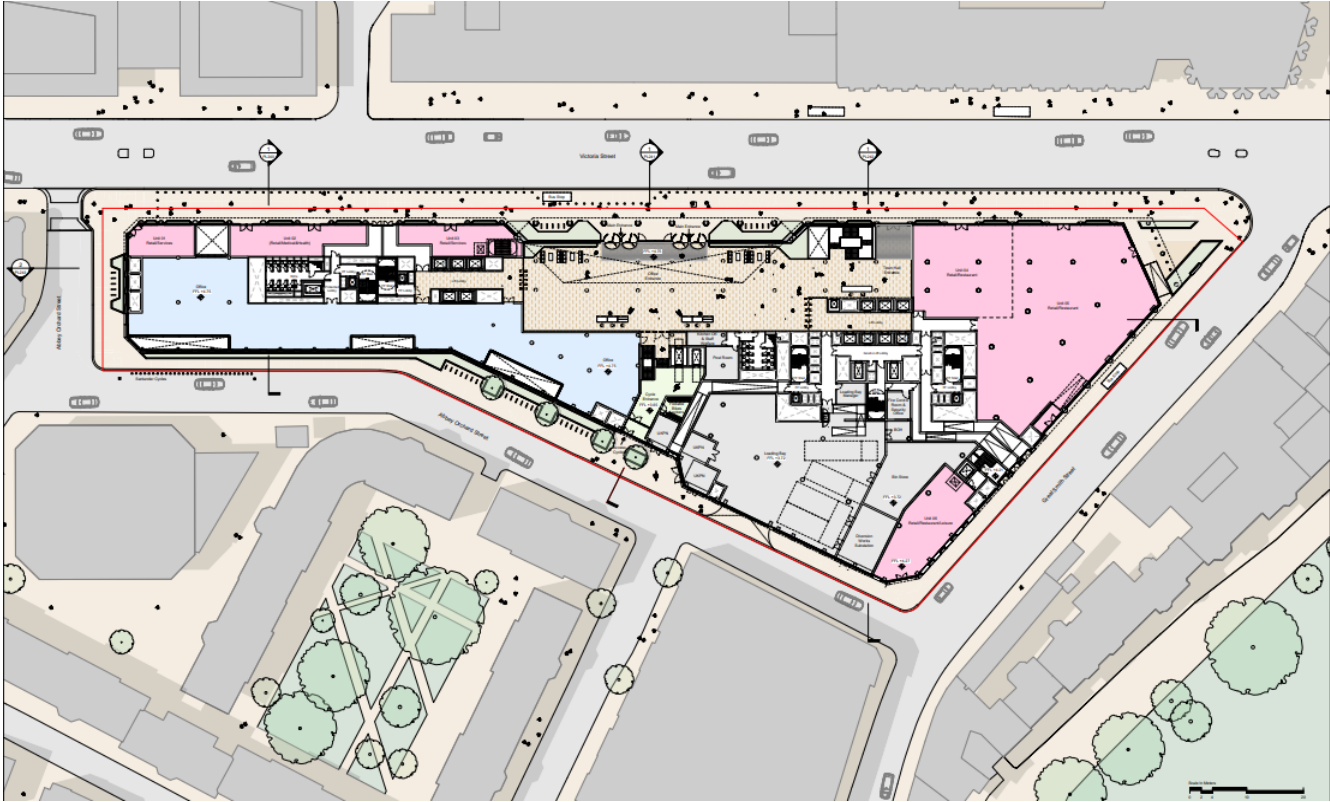
IF YOU HAVE ANY QUERIES ABOUT THIS REPORT PLEASE CONTACT THE PRESENTING OFFICER: MATTHEW MASON BY EMAIL AT mmason@westminster.gov.uk.

11. KEY DRAWINGS

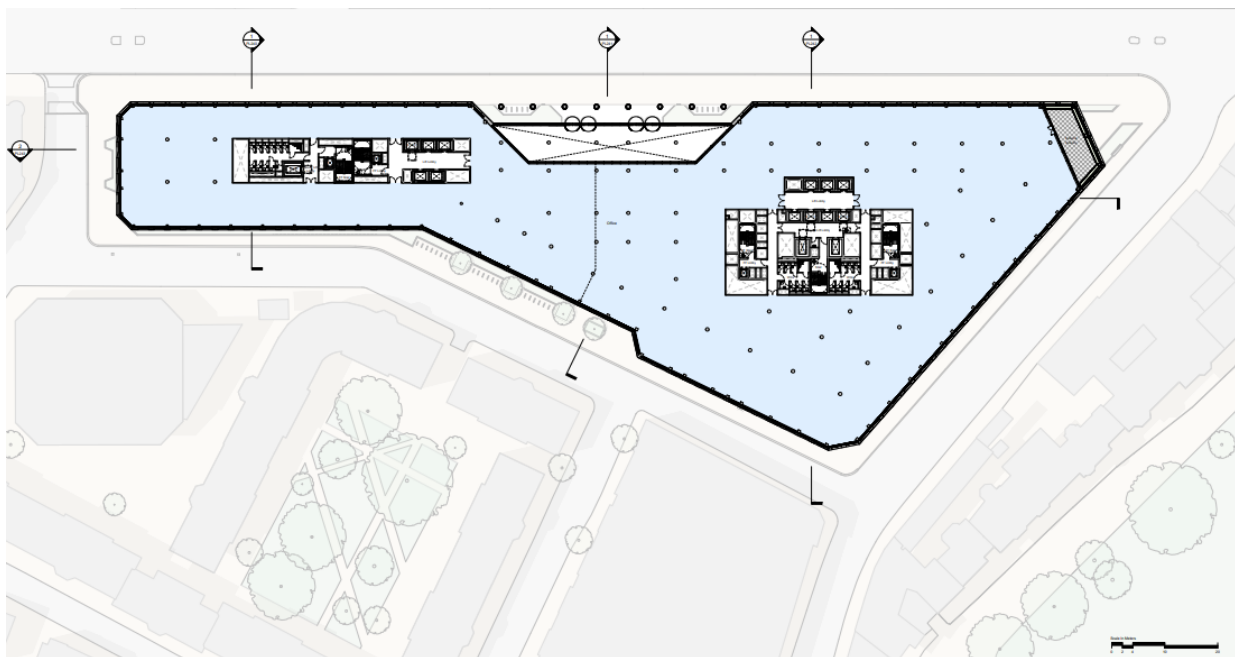
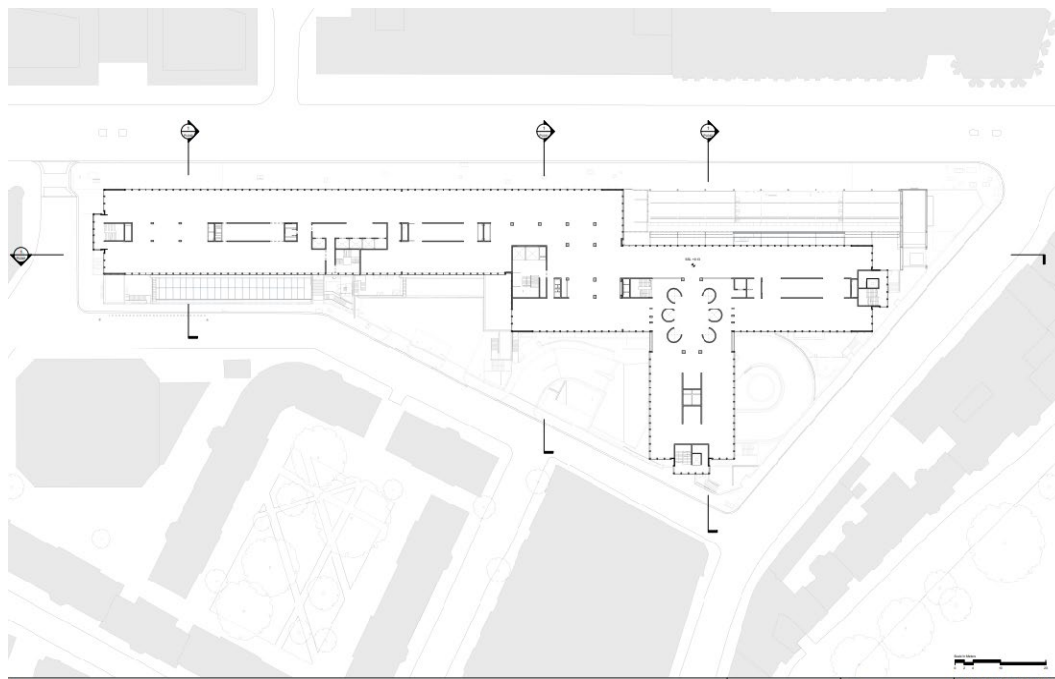
Existing ground floor plan including existing rear servicing area.



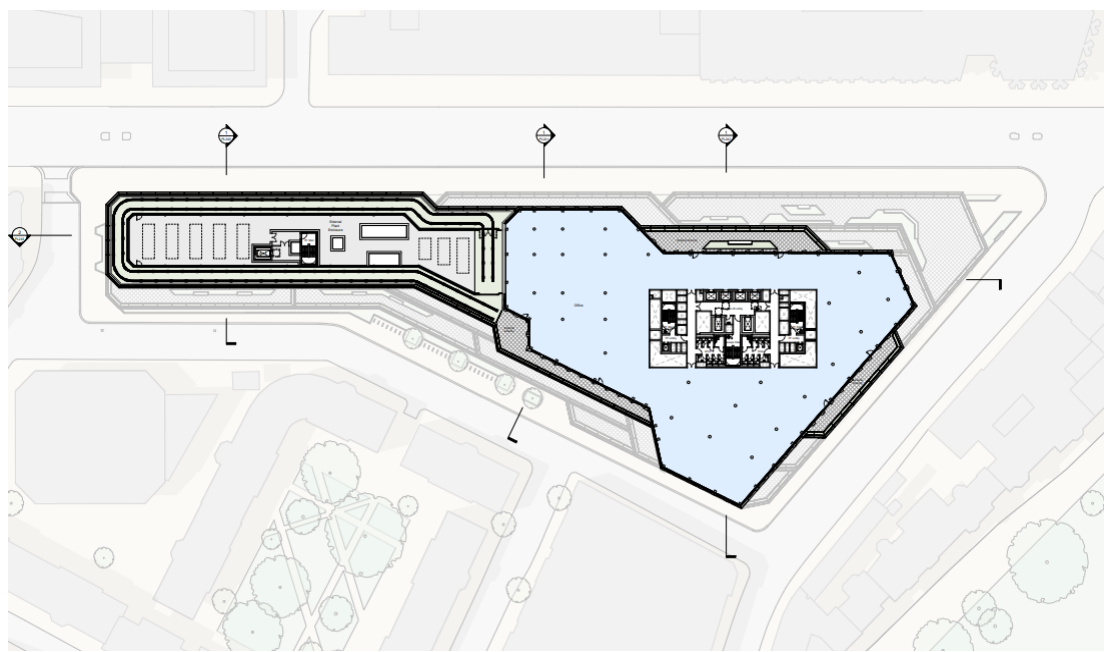
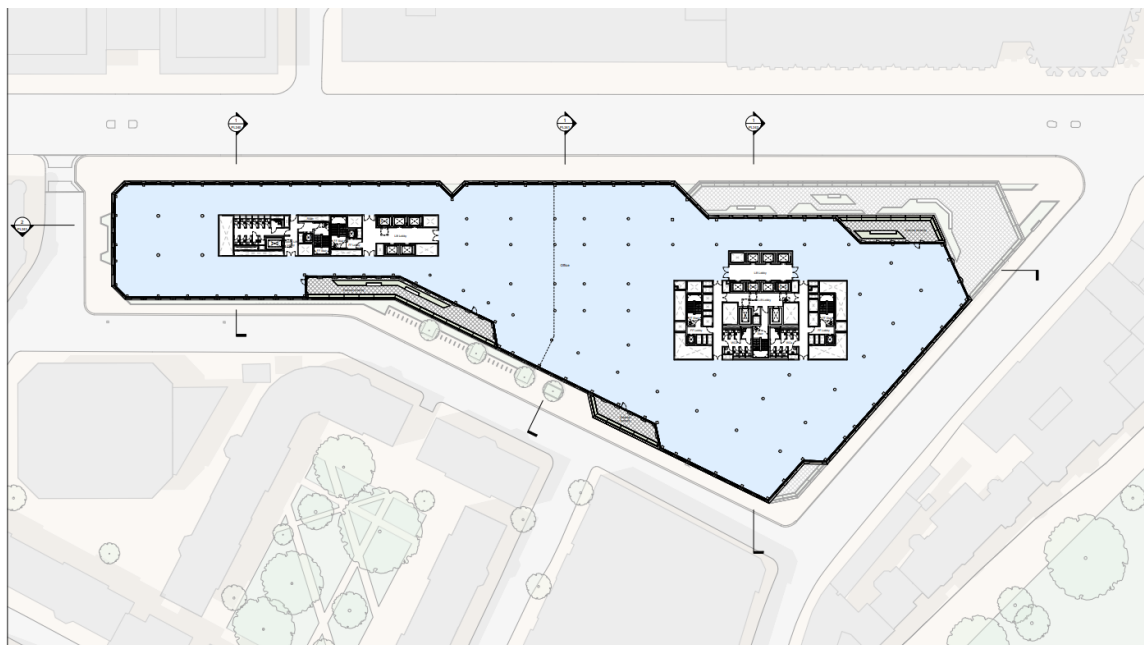
Proposed ground floor plan showing enclosed servicing bay at rear



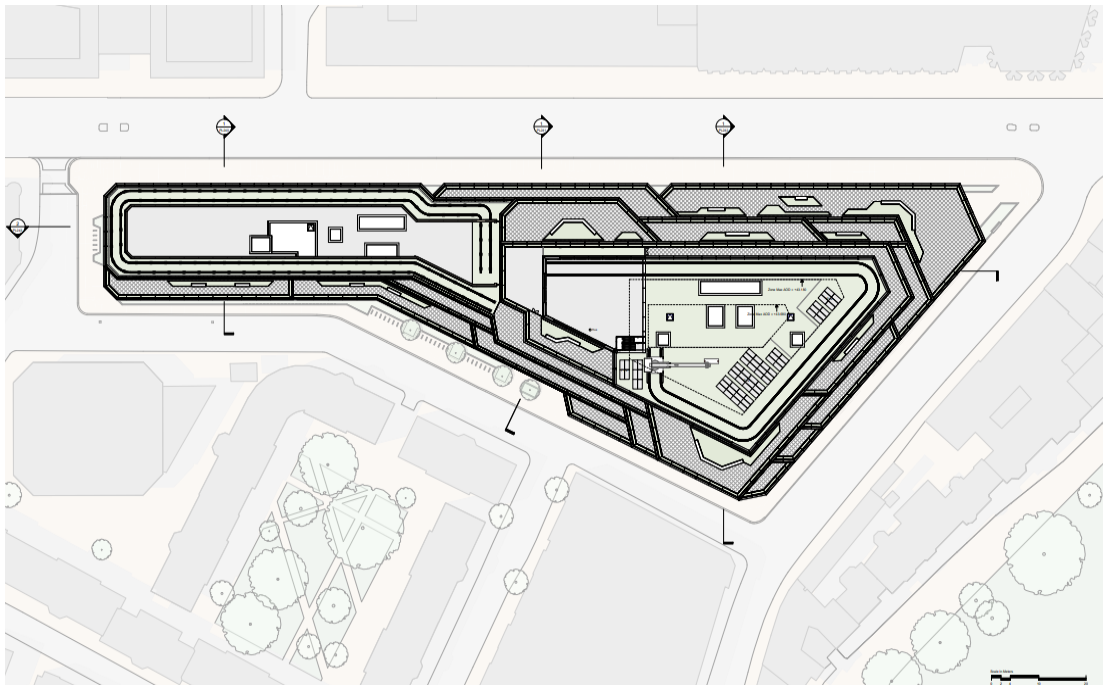
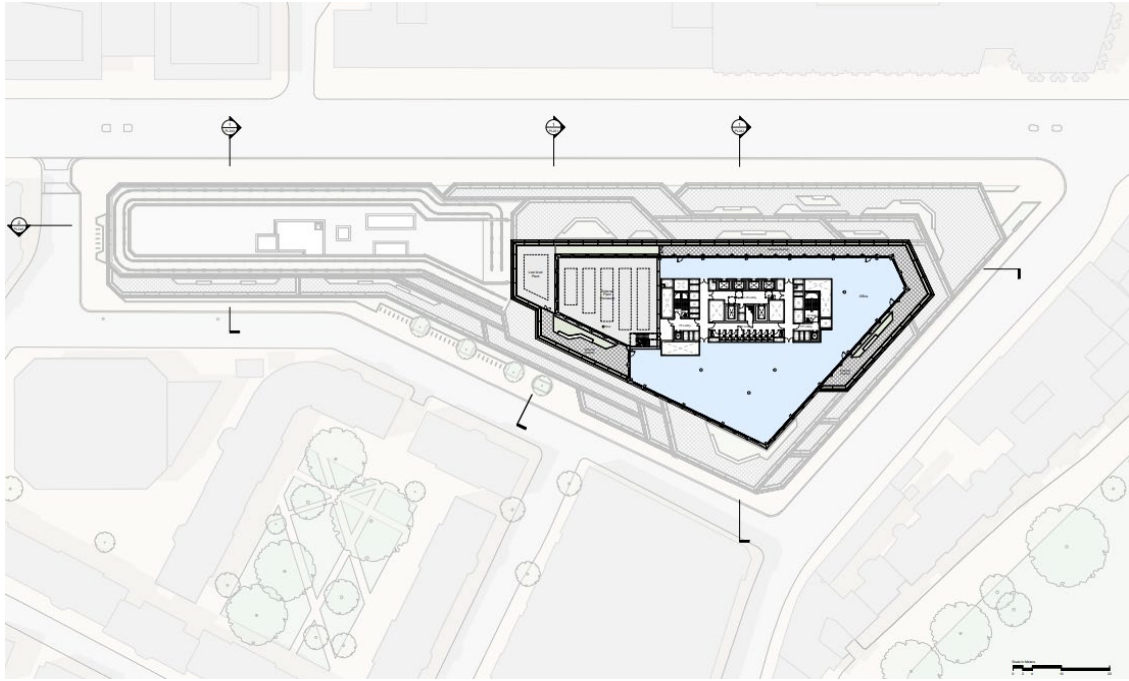
Existing first floor (top) and proposed first floor (bottom)



**Proposed fourth floor (top) and proposed seventh floor (bottom)
showing office floorplates with terraces**



Proposed level 9 (top) and roof plan (bottom)



Proposed elevations



Victoria Street Elevation



Abbey Orchard Street Elevation



Abbey Orchard Street west Elevation



Great Smith Street Elevation

**Victoria Street outside No. 26 Victoria Street
Existing (top) and proposed (bottom)**



Broad Sanctuary at United Nations Green existing (top) and as proposed (bottom)



Dean's Yard south east corner existing (top) and as proposed (bottom) winter view



Dean's Yard north east existing (top) and as proposed (bottom) (winter view)



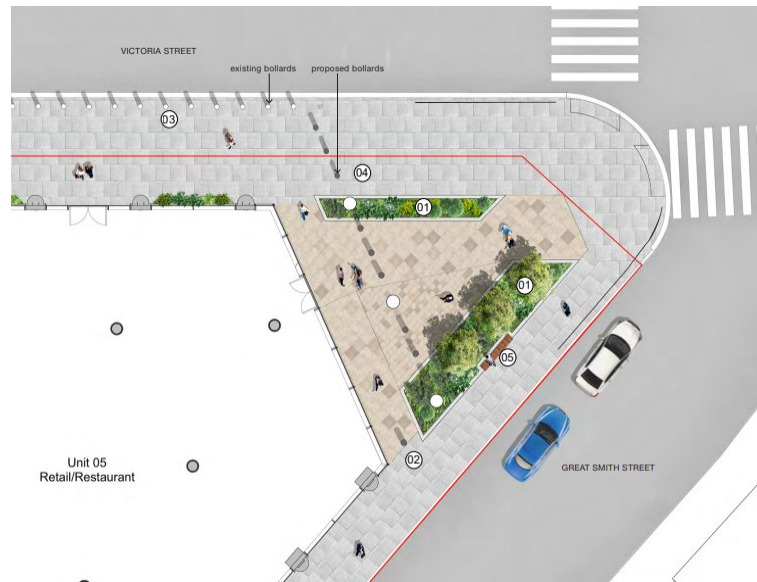
Westminster Abbey existing (top) and proposed (bottom (winter view))



Abbey Orchard Street as proposed (illustration)



Eastern Entrance Space



APPENDIX 1

Table 1 Results of Baseline (Existing) vs Proposed Development (Vertical Sky Component)

Property	Building Use	Total No. of windows that retain at least 80% of their baseline VSC		Number of windows below BRE Guidelines			
		Meet	Total	20.1-30% reduction	30.1-40% reduction	>40% reduction	Total
8-10 Broadway, Victoria Street	Mixed Use	120	122	1	-	1	2
2-8 Victoria Street	Commercial	295	295	-	-	-	-
10-18 Victoria Street	Commercial	253	263	5	1	4	10
20 Victoria Street	Commercial	142	142	-	-	-	-
5-8 The Sanctuary	Commercial	57	57	-	-	-	-
3 & 3A Deans Yard	Mixed Use	288	294	3	2	1	6
3B Deans Yard	Residential	34	35	1	-	-	1
Westminster Abbey Choir School, Great Smith Street	Educational	109	109	-	-	-	-
4 Deans Yard	Residential	40	40	-	-	-	-
4A Deans Yard	Commercial	12	31	15	2	2	19
4B & 5 Deans Yard	Residential	20	20	-	-	-	-
Sanctuary Buildings, Great Smith Street	Commercial	127	166	3	19	17	39
Abbey Orchard Street Estate, Abbey Orchard Street	Residential	76	196	77	43	-	120
Luke House, Abbey Orchard Street	Mixed Use	128	136	7	-	1	8
1 Abbey Orchard Street/25-27 Victoria Street	Commercial	146	150	2	2	-	4
Total		1,847	2,056	114	69	26	209

Table 2 Results of Baseline (Existing) vs Proposed Development (NSL)

Property	Building Use	Total rooms that retain at least 0.8 of their former Daylight Distribution		Number of rooms below BRE Guidelines			
		Meet	Total	20.1-30% reduction	30.1-40% reduction	>40% reduction	Total
8-10 Broadway, Victoria Street	Mixed Use	31	32	-	-	1	1
2-8 Victoria Street	Commercial	14	14	-	-	-	-
10-18 Victoria Street*	Commercial	48	72	13	11	-	24
20 Victoria Street	Commercial	17	23	4	2	-	6
5-8 The Sanctuary	Commercial	14	14	-	-	-	-
3 & 3A Deans Yard	Mixed Use	31	58	6	11	10	27
3B Deans Yard*	Residential	2	13	4	6	1	11
Westminster Abbey Choir School, Great Smith Street*	Educational	14	25	8	2	1	11
4 Deans Yard*	Residential	11	14	3	-	-	3
4A Deans Yard*	Commercial	0	3	1	1	1	3
4B & 5 Deans Yard*	Residential	6	6	-	-	-	-
Sanctuary Buildings, Great Smith Street	Commercial	18	20	-	1	1	2
Abbey Orchard Street Estate, Abbey Orchard Street	Residential	85	155	9	20	41	70
Luke House, Abbey Orchard Street	Mixed Use	52	54	2	-	-	2
1 Abbey Orchard Street/25-27 Victoria Street	Commercial	9	9	-	-	-	-
Total		352	512	50	54	56	160

Table 3 Results of Baseline (Existing) vs Proposed Development (Annual Probable Sunlight Hours)

Property	Building Use	Total rooms that meet BRE Guidelines for APSH with proposal in place	
		Meet	Total
8-10 Broadway, Victoria Street	Mixed Use	32	32
2-8 Victoria Street	Commercial	14	14
10-18 Victoria Street*	Commercial	64	72
20 Victoria Street	Commercial	20	23
5-8 The Sanctuary	Commercial	3	3
3 & 3A Deans Yard	Mixed Use	8	10
3B Deans Yard*	Residential	3	3
Westminster Abbey Choir School, Great Smith Street*	Educational	7	7
4 Deans Yard*	Residential	N/A	-
4A Deans Yard*	Commercial	N/A	-
4B & 5 Deans Yard*	Residential	2	2
Sanctuary Buildings, Great Smith Street	Commercial	16	16
Abbey Orchard Street Estate, Abbey Orchard Street	Residential	N/A	-
Luke House, Abbey Orchard Street	Mixed Use	1	1
1 Abbey Orchard Street/25-27 Victoria Street	Commercial	8	8
Total		178	191

Appendix 2

Table 4: Daylight and sunlight analysis for bedrooms at Abbey Orchard Estate, Block A

DAYLIGHT & SUNLIGHT ANALYSIS										
Project No: 3690, Existing v Proposed 07/05/24										
DAYLIGHT ANALYSIS										
Receptor				Vertical Sky Component (VSC)			No-Sky Line (NSL)			
Room	Floor	Room Use	Window	Existing VSC	Proposed VSC	%Loss	Room Area (sq ft)	Existing (sq ft)	Proposed (sq ft)	%Loss
BLOCK A PEABODY TRUST ABBEY										
R2/260	Ground	Bedroom	W14/260	16.5	11.2	32.10	97.3	55.0	27.4	50.0
R9/260	Ground	Bedroom	W3/260	15.0	10.9	27.17	92.8	48.7	41.1	15.8
R10/260	Ground	Bedroom	W2/260	15.1	11.7	22.52	50.5	40.6	34.9	14.0
R2/261	First	Bedroom	W12/261	18.5	13.0	29.57	97.3	66.3	33.1	50.1
R9/261	First	Bedroom	W15/261	16.8	12.7	24.39	92.9	57.1	49.2	13.8
R1/262	Second	Bedroom	W14/262	17.8	15.8	11.04	116.0	76.0	58.0	23.7
R2/262	Second	Bedroom	W12/262	20.6	15.1	27.08	97.3	80.0	39.7	50.3
R9/262	Second	Bedroom	W15/262	18.6	14.8	20.17	92.9	68.1	59.2	12.9
R1/263	Third	Bedroom	W14/263	19.6	17.8	9.09	116.0	87.5	66.4	24.1
R2/263	Third	Bedroom	W12/263	22.9	17.2	24.85	97.3	89.1	48.5	45.6
R2/264	Fourth	Bedroom	W12/264	25.3	19.7	22.38	97.3	90.6	60.5	33.2
R2/265	Fifth	Bedroom	W12/265	27.5	22.0	20.12	97.4	92.2	72.3	21.6

Table 4: Daylight and sunlight analysis for bedrooms at Abbey Orchard Estate, Block B

DAYLIGHT & SUNLIGHT ANALYSIS										
Project No: 3690, Existing v Proposed 07/05/24										
DAYLIGHT ANALYSIS										
Receptor				Vertical Sky Component (VSC)			No-Sky Line (NSL)			
Room	Floor	Room Use	Window	Existing VSC	Proposed VSC	%Loss	Room Area (sq ft)	Existing (sq ft)	Proposed (sq ft)	%Loss
BLOCK B PEABODY TRUST ABBEY										
R1/270	Ground	Bedroom	W1/270	16.6	11.2	32.53	79.3	55.2	27.1	50.9
R6/270	Ground	Bedroom	W8/270	14.8	9.5	35.92	96.6	49.2	23.4	52.2
R2/271	First	Bedroom	W1/271	18.5	12.9	30.14	79.2	64.6	32.7	49.4
R7/271	First	Bedroom	W9/271	16.5	11.0	33.17	96.9	57.7	27.8	52.0
R2/272	Second	Bedroom	W1/272	20.5	14.8	27.54	79.2	69.8	38.5	44.8
R7/272	Second	Bedroom	W9/272	18.3	12.8	30.29	96.6	62.6	31.0	50.5
R2/273	Third	Bedroom	W1/273	22.6	16.9	24.98	79.3	69.7	46.4	33.4
R7/273	Third	Bedroom	W9/273	20.3	14.7	27.46	96.6	67.4	37.4	44.5
R2/274	Fourth	Bedroom	W1/274	24.8	19.3	22.41	79.2	71.8	55.5	22.7
R7/274	Fourth	Bedroom	W9/274	22.5	16.9	24.73	96.6	72.6	42.7	41.2
R2/275	Fifth	Bedroom	W1/275	26.9	21.5	20.06	79.2	73.3	66.4	9.5
R7/275	Fifth	Bedroom	W6/275	24.5	19.1	22.02	96.6	78.6	50.6	35.8