

<b>CITY OF WESTMINSTER</b>			
<b>PLANNING APPLICATIONS SUB COMMITTEE</b>	<b>Date</b> 29 November 2022	<b>Classification</b> For General Release	
<b>Report of</b> Director of Town Planning & Building Control		<b>Ward(s) involved</b> St James's	
<b>Subject of Report</b>	<b>The National Gallery, Trafalgar Square, London, WC2N 5DN,</b>		
<b>Proposal</b>	Remodelling of external gates, replacement glazing and adaption and enclosure of the loggia of the Sainsbury Wing. External alterations to the Wilkins Building, including alterations and part removal of railings, lawn and wall, with new entrance on Trafalgar Square to the Research Centre and Members Room. Excavation of a new basement link between Sainsbury Wing and Wilkins Building under Jubilee Walk, including excavation. Public realm works to the north of Trafalgar Square and Jubilee Walk, including new paving, benches and bollards. New window and external alterations to Pigott Education Centre on Orange Street. Internal alterations to Sainsbury Wing, Wilkins Building and Pigott Education Centre.		
<b>Agent</b>	The Planning Lab – Ms Kelly Ryder		
<b>On behalf of</b>	The National Gallery		
<b>Registered Number</b>	22/04894/FULL and 22/04895/LBC	<b>Date amended/ completed</b>	17 October 2022
<b>Date Application Received</b>	19 July 2022		
<b>Historic Building Grade</b>	Wilkins (main) Building: Grade I Sainsbury Wing: Grade I		
<b>Conservation Area</b>	Trafalgar Square		
<b>Neighbourhood Plan</b>	Not applicable		

## 1. RECOMMENDATION

1. Grant conditional permission subject to a S106 legal agreement to secure the following:
  - i. Provision of highway works and works to the public realm necessary to facilitate the development;
  - ii. Provision of and adherence to a Walkways Agreement relating to Jubilee Walk; and
  - iii. The cost of monitoring the 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 Town Planning and Building Control 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 Town Planning and Building Control is authorised to determine and issue such a decision under Delegated Powers; however, if not
  - b) The Director of Town Planning and Building Control 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 Town Planning and Building Control is authorised to determine the application and agree appropriate reasons for refusal under Delegated Powers.
2. Grant conditional listed building consent.
  3. Agree the reasons for granting conditional listed building consent as set out in informative on the draft listed building consent decision letter.

## 2. SUMMARY & KEY CONSIDERATIONS

The National Gallery houses one of the most significant art collections in the world. It will be celebrating its Bicentenary Year in 2024/25 and the National Gallery sees this as an opportunity for relaunching themselves as a gallery for the nation and the world. The planning and listed building application proposals include internal and external alterations to the National Gallery's buildings, excavating underneath Jubilee Walk and public realm works. The goals are to improve the visitor welcome at the Sainsbury Wing, improve the public realm, improve the education and research centres, improve circulation throughout the buildings, to create spaces for members and to improve the energy performance of the buildings.

The National Gallery and the surrounding area are of intense heritage significance and immense national/ international cultural importance. The main gallery building, the Wilkins Building, is grade I listed, and the adjoining Sainsbury Wing is independently grade I listed. Adjoining to the north is the grade I listed National Portrait Gallery, to the east is the grade I listed Church of St Martin-in-the-Fields and to the south is the grade I Trafalgar Square and Nelson's Column – one of the most important public squares/ landmarks in the nation. The site is located within the Trafalgar Square Conservation Area and the Central Activities Zone.

The key considerations in this case are:

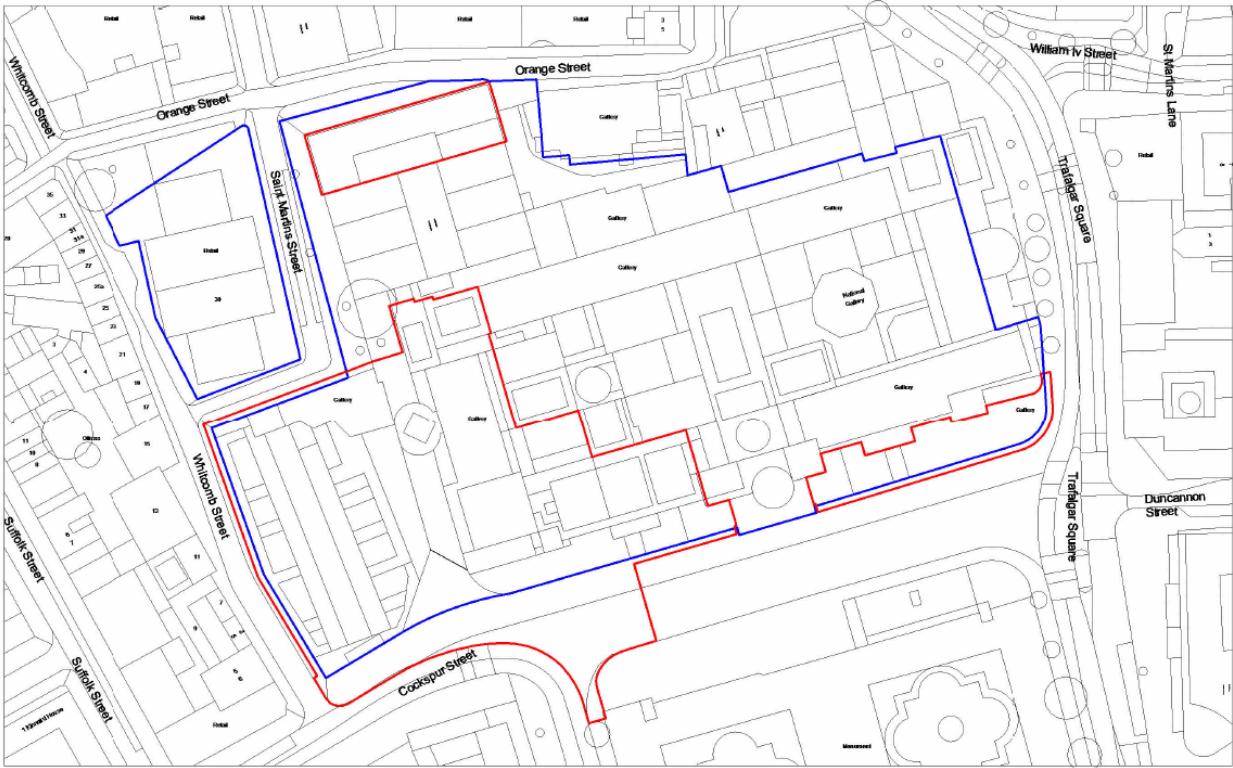
- The impact of the proposed internal and external alterations to the special architectural and historic interest of these grade I listed buildings;
- The impact of the proposed external alterations and public realm works on the character and appearance of the Trafalgar Square Conservation Area and the setting of the other nearby designated heritage assets;

- The impact of the proposed excavation on archaeological heritage assets;
- The impact of the proposed development on amenity and local environmental quality;
- The impact of the public realm works on the pedestrians, the highway and the function of Trafalgar Square; and
- The impact of the proposed alterations on the energy performance of the proposed building.

Objectors consider the proposals harmful to the significance of the listed buildings and that this harm is not justified / outweighed by public benefits. Supporters consider the proposals would improve the National Gallery and would result in public benefits, and any harm to the listed buildings is outweighed by public benefits.

This report explains the proposed development/ works would be consistent with relevant development plan policies in the Westminster's City Plan 2019-2040 (April 2021) and the London Plan (March 2021). There would be less than substantial harm to heritage assets, principally the grade I listed Wilkins Building and grade I listed Sainsbury Wing, but this harm is outweighed by public benefits. As such, the proposals are considered acceptable in heritage, townscape, design, land use, amenity, environmental and highway terms and the applications are recommended for approval subject to a legal agreement relating to the planning application and conditions to both the planning and listed building applications as set out in the draft decision letters.

**3. LOCATION PLAN**



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4. PHOTOGRAPHS



National Gallery from Above

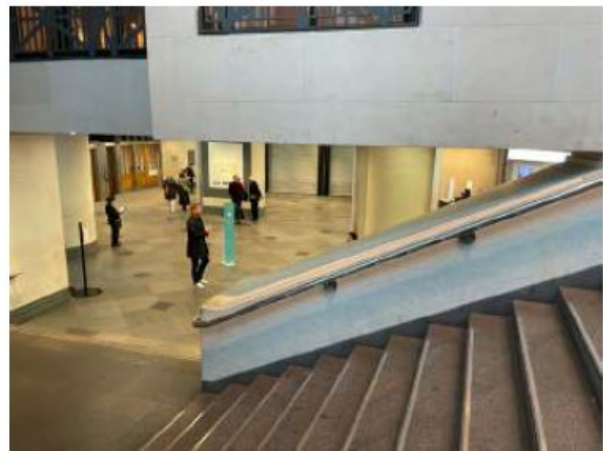
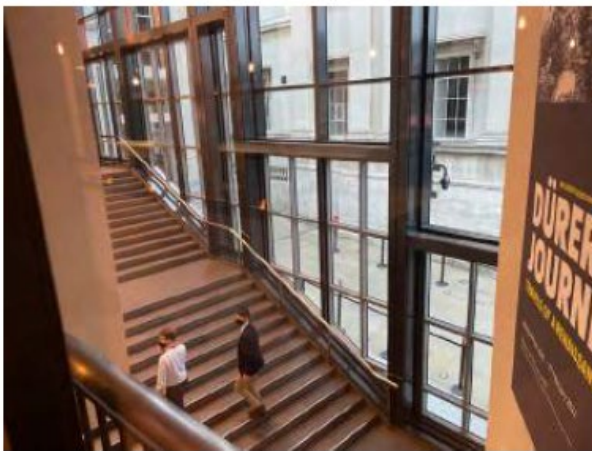


Portico Wilkins Building Left, Sainsbury Wing Right









Internal lobby and stairs of Sainsbury Wing

## 5. CONSULTATIONS

### 5.1 Application Consultations

#### First Consultation

##### WESTMINSTER SOCIETY:

The aims are admirable and the need for improvements are justifiable and overdue. In relation to improvements by other European galleries The National Gallery is now looking tired and in need of some reinvention to improve the visitor experience.

Although, generally underwhelmed by the ambition to make more uplifting spaces and more extensive improvements. The visuals are very sterile and give nothing away as to the real impressions of the new/remodelled spaces. Westminster Society are hoping between approval and implementation, the design team are braver and bring some joy to the scheme. If not, this will be a lost opportunity.

##### HISTORIC ENGLAND (Listed Buildings/ Conservation Areas):

The Sainsbury Wing is one of the most special, celebrated and individual buildings of post-war London. It and the Wilkins Building are the principal parts of the National Gallery. They are each of outstanding heritage significance and together form a vital cultural asset. Their very high significance is reflected in the individual grade I listing of each building. Historic England acknowledges the challenges faced by the National Gallery in respect of arrival, access and internal circulation, and the desire to improve the visitor experience of one of the world's most important art galleries. The proposals would cause harm to both of these highly significant grade I listed buildings, however. It would be possible to reduce that harm while still achieving the main objectives of the project. Historic England therefore urge the City Council to seek changes to the scheme before the application is determined.

##### HISTORIC ENGLAND (Archaeology):

The site is located in a Tier I Archaeological Priority Area at the western extremity of Anglo-Saxon Lundenwic and over the site of the Royal Mews. The applicant has carried out field evaluation and a desk-based assessment, this included trial pits which have found the structural remains of the post-medieval 'Great Stables' under the Wilkins building, and these remains are considered to be of high significance. The proposed basement would cause harm to this buried archaeology, and it is advised to reconsider the footprint/ design of the new basement in order to avoid or minimise harm to the significance of these archaeological heritage assets. Other archaeological impacts could be dealt with appropriately by condition.

##### HISTORIC BUILDINGS AND PLACES (Formerly ancient monuments society):

The Sainsbury Wing was not designed to be the main entry to the Gallery, but in recent years has assumed this role, and the proposals need to be considered in light of wider access across the whole site. The natural entrance to the National Gallery is the historic grand staircase that is aligned to the centre of Trafalgar Square in the Wilkins Building and the closing of this has greatly diminished its significance and effectively leaves the Wilkins Building as an annex to the Sainsbury Wing. The relocation of the main entrance



to the Sainsbury Wing harms the significance of the heritage assets. The Gallery should reopen the Wilkins Building entrance and the Sainsbury Wing should be an additional accessible entrance, as originally conceived. Without considering other access points to mitigate the overall harm to a listed building, it is difficult to conclude if the public benefits outweigh that harm. Recognise some alteration to the Sainsbury Wing is required, and do not object to the replacement of the glazing to the glass façade or the removal of the non-structural columns. Concern raised regarding the removal of part of the first floor slab by the stair and suggest it should be smaller. Cladding to the columns should be retained and a resolution to the Egyptian columns found.

Much of the work to the Wilkins Building appears reasonable, the new basement would improve circulation and would affect the secondary spaces mainly.

#### THE VICTORIAN SOCIETY:

The Wilkins Building is characterised by its symmetry which extends across the entire south elevation despite the sloping ground from east to west and minor later alterations to the building. This symmetry is reinforced by the boundary walls and railings, which extend across the elevation, unifying the composition and serving to enhance the sense of a plinth-like base supporting the entire building. The proposal to the boundary wall at the western end of the Wilkins Building to create public realm and a new entrance would result in loss of fabric, destroy the overall symmetry and unit of the composition and emphasis the sloping site which the existing boundary cleverly disguises. The illusionary plinth on which the building appears to be raised would be removed in fragment, and the architectural effect of it profoundly undermined. It would also erode the legibility of the building's historic boundary and relationship to Trafalgar Square, opening the building in a way which was not the architect's intention. It would result in serious harm to the significance of the building. The Victorian Society is unconvinced that these proposals are necessary or demand such harmful changes to the building. Trafalgar Square is already large and it is unclear why more space is required. The new entrance into the Wilkins Building would only be for those using the research and members area – a more modest entrance could have been formed to the side, so this is not justified. There is also opposition to tree planting to the front lawns. The trees would obscure viewing of the building harming the appreciation of it.

#### THE TWENTIETH CENTURY SOCIETY:

Objection because the proposal involves substantial and unjustifiable harm. Recognition the Gallery needs to adapt to changing visitor numbers and needs and the limited potential to provide adequate orientation space in the portico entrance of the Wilkins Building. However, reject that this must be done at significant cost to the architectural and historic significance of the Sainsbury Wing. The proposal results in harm because of the removal and reduction in size of the lobby columns. The size and number of the columns contribute to the sense of weight and the lobby's function as an anticipatory space. The cuts into the first floor slab also cause harm because the sense of compression could be lost, particularly by the stair and the society considers a more moderate version could be possible. The loss of existing internal finishes, Egyptian-style -deco' columns and internal walls and seating in the Rotunda would also cause harm to the significance of the building.

#### COUNCIL FOR BRITISH ARCHAEOLOGY:

Any response to be reported verbally.

**SOCIETY FOR THE PROTECTION OF ANCIENT BUILDINGS:**

Any response to be reported verbally.

**THE GEORGIAN GROUP:**

Any response to be reported verbally.

**METROPOLITAN POLICE (Designing Out Crime):**

Any response to be reported verbally.

**LONDON HISTORIC PARKS AND GARDENS:**

Any response to be reported verbally.

**GREATER LONDON AUTHORITY (Trafalgar Square Team):**

Any response to be reported verbally.

**TRANSPORT FOR LONDON**

The proposals do not change any of the existing servicing, waste or delivery arrangements. The Highway works required are on Westminster land and these are a matter for Westminster. London Underground should be consulted on any new planting above TfL tunnel infrastructure. TfL request to be consulted on the Code of Construction Practice document and future Construction Management Plan.

**LONDON UNDERGROUND:**

No objection to the proposals, however, request a condition be attached to ensure details of any works around London Underground assets are provided to ensure the infrastructure is safeguarded.

**THAMES WATER:**

Thames Water provides advice to the applicant regarding sewerage network and requires a condition be attached relating to piling because the site is close to public sewers. Thames water would advise that with regard to both the surface water and foul water network infrastructure capacities, they have no objection. Subject to an informative to advise the applicant, Thames Water have no objections in relation to the water network infrastructure capacity

**ENVIRONMENTAL HEALTH:**

No comments.

**WASTE PROJECT OFFICER:**

Details of the waste storage arrangements are not line with the City Council's requirements.

**HIGHWAYS PLANNING TEAM:**

The site has existing waste storage areas, there would be no change to the off-street servicing provision although the site would benefit from a rapid electric vehicle charger. The majority of trips associated with the site (excluding servicing activity) will be via public transport or other sustainable modes.

**PLACESHAPING (Public Realm):**

Any response to be reported verbally.

#### ARBORICULTURAL SECTION:

Concern raised regarding a loss of symmetry to the lawns and a lack of symmetry in the proposed tree planting scheme. Planting single specimens rather than the proposed groups will create a more appealing scheme. Single trees will frame the National Gallery building rather than obscure it and single specimens will be able to reach larger sizes without the need for premature or overly frequent pruning. Concern raised regarding the size of the tree species that have been chosen.

#### PREPARE AND PREVENT OPERATIONAL CONTEST OFFICER:

Broadly the design of the security within the public realm is appropriate for the location. The detailed design and appropriate rating for the bollard need to be ensured. This includes ensuring the line cannot be undermined by a hostile vehicle while ensuring access onto the North Terrace.

#### ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED

No. Consulted: 133

Total No. of replies: 29 (not including duplicates)

No. of objections: 27 (from 25 and individuals/ organisations)

No. in support: 1

No. neither in support or objection: 1

#### *Objections*

In summary 25 residents and other interested parties object on the following summarised grounds:

#### Heritage Impact and Design:

- The Sainsbury Wing is of great architectural significance and the proposals would harm it;
- The proposals would undermine/ harm the original design intent of the entrance lobby of the Sainsbury Wing;
- The Sainsbury Wing entrance lobby is intentionally low and compressed, opening it up by removing parts of the first floor slab and columns is therefore harmful;
- The new the lobby would not respect the existing/ original lobby and would be inappropriate in design/ heritage terms;
- Slight adjustments could be made to the Sainsbury Wing, rather than the proposals, which would improve the functionality of the lobby;
- The reduction in the first floor slabs in the Sainsbury Wing and loss of the restaurant space to a café means one cannot appreciate the views onto the square from there;
- Alterations to the original gates of the Sainsbury Wing/ Jubilee Walk would harmfully change the original character of the gates;
- Removal of the window shades and replacement with internal sunshades in the Sainsbury Wing would be a major change;
- The removal of partitions within the rotunda would harm the significance of the gallery floor level of the Sainsbury Wing;
- The principal entrance to the National Gallery should be the Wilkins Building portico entrance, and transferring it to the Sainsbury Wing is harmful to the significance of the listed buildings;



- The Wilkins Building portico entrance should be altered to incorporate lifts (like other buildings) rather than transfer the principal entrance to the Sainsbury Wing;
- The dark glazing along the stair elevation is integral to the gallery experience and the replacement with clear glazing would be harmful therefore;
- Replacement of stone paving is unnecessary;
- The proposal would result in a more bland and modern style interior
- The submission lacks analysis of other options that have been considered;

Landscaping:

- Loss of part of the western lawn damages the Wilkins Building and Trafalgar Square

Public Benefits:

- Whilst understanding of the need/ pressure to change how the National Gallery functions, this is not outweighed by the harm;
- The National Gallery does not receive as many visitors as claimed, and therefore this undermines the rationale/ justification for the proposals;

Other:

- The proposals would result in more queuing outside;
- Queries whether accessibility issues will continue to an issue and perhaps new lifts will need to be installed in future;
- The proposals would ironically worsen the site's ability to earn income for the National Gallery;
- The National Gallery's representation of the existing entrance at the Sainsbury Wing in their posters (put up within the gallery) makes it appear darker than it is;
- There is no need for more café space;

*Support*

In summary one interested party supports on the following summarised ground:

- Agree with the principles of the scheme to improve the welcome at the Sainsbury Wing ensuring it is inclusive and to better connect the gallery with the square and improve access, strengthen self-generated earned income opportunities and becoming an exemplar in sustainable and inclusive building design;
- The proposals align with Heart of London's priority to ensure the West End comes back from the pandemic even stronger than before;

*Neither in support or objection*

In summary one resident states neither support or objection but raises the following query:

- Where are Denise Scott-Brown's comments regarding the proposals published?

PRESS NOTICE/ SITE NOTICE:

Yes

**Second consultation (following revisions)**

WARD COUNCILLOR HYAMS:

Support. Impressed with the improvements that the National Gallery propose to make.

**WESTMINSTER SOCIETY:**

No objection to the main proposals and have only one detail concern. Westminster Society question whether alterations to the size of opening into the main staircase is absolutely necessary. We do think the staircase space merits the same level of protection as the galleries above with minimum alteration. Would have liked to have seen the more technical reasoning as to why the Wilkins Building portico entrance could not have been adapted.

No objections to new members area, no concerns regarding external alterations to the buildings. The new public realm area is needed and the loss of the lower ground wall and landscaping is justified. Not convinced that the altered gates are required however. Accept the existing entrance lobby needs to be enlarged. Welcome the reuse of the Egyptian columns. Dislike the glass balustrading. Unfortunate that the toilets are at basement level. Question whether the removal of the floor slab in the Sainsbury Wing is necessary and in particular the size of opening to the main stair.

**HISTORIC ENGLAND (Listed Buildings/ Conservation Areas):**

Broadly, Historic England categorised the harm of the original proposals in two ways: harm that would arise from works that the Gallery argues is crucial for delivering greater accessibility in all its senses, but which it felt could be handled in ways that better preserve heritage significance; and harm that it felt could not easily be justified.

In relation to the latter, it is welcomed that the revised proposal retains the walls in the Rotunda, the metal entrance gates to Jubilee Walk and Egyptian-style columns. And it is welcomed that the colour of the gates will be rethought and reserved by condition. The Gallery argues that the more substantive proposed alterations for which Historic England have identified harm - including the creation of a new entrance square outside the Sainsbury Wing and the opening-up of its ground-floor spaces - are necessary to accommodate large numbers of visitors and to provide more inclusive access to the buildings and the collection. Historic England continue to acknowledge the challenges faced by the Gallery in respect of arrival, access and internal circulation, and the desire to improve the visitor experience, and understand that some alteration would be required to address these challenges. Historic England welcomes the other alterations to the scheme which introduce greater texture and solidity.

The scheme would still cause some harm to significance as a result of large interventions which would affect the original design of both the Sainsbury Wing and Wilkins Building. For the purposes of the NPPF, Historic England would characterise this harm as less than substantial. However, in relation to paragraph 195 of the NPPF, which encourages local authorities to seek to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal, we think that the harm is now no more than is necessary to secure the objectives that have been identified by the Gallery as being key to the project.

**HISTORIC ENGLAND (Archaeology):**

The applicant has now submitted a revised interpretation of the archaeological evaluation based on a map regression which has provided considerable comfort in relation to the underground link and its effects on the buried remains of the Royal Mews. This revised mapping analysis now indicates that rather than potentially cutting through

the buried remains of William Kent's stables, the basement excavation would be located in what appears to have been a yard directly to the north. The consequent effects of the proposed works on significance of the buried archaeology are therefore likely to be less than was previously predicted, with any remaining harm capable of being mitigated by a condition requiring archaeological investigation and partially compensated for by public benefits arising from engagement and interpretation both during the investigation and in the completed development.

**HISTORIC BUILDINGS AND PLACES (Formerly ancient monuments society):**

Welcome certain elements of the revised proposal, such as the retention and reuse of the Egyptian columns and the 'mannerist' cladding to the pillars. However, remain concerned about the level of harm the proposed alterations would have on the significance and integrity of the Grade I listed Sainsbury Wing, as outlined in the original submission. Understand the challenges presented by the building and the operations of the National Gallery and these need to be carefully analysed. It appears that the real, deep-seated problems of visitor circulation and experience are not going to be fully addressed by this scheme, and thus the public benefits would not outweigh the level of harm caused.

Recommends the application is withdrawn and we encourage the National Gallery Trustees to explore a wider range of solutions that will better respect the buildings they have and broaden the visitor experience within the complex. Given the Gallery's ownership of St Vincent House to the rear of the Sainsbury Wing, perhaps a more radical approach is needed, as has happened, for example, with the recently completed new entrance pavilion and visitor sequence to the Museumsinsel in Berlin.

**THE VICTORIAN SOCIETY:**

Maintains objection. Welcome the changes to the proposals, particularly the omission of trees on the lawns in front of the south elevation of the Wilkins Building. However, it is unfortunate that the Victorian Society's other concerns with the scheme, namely the alterations to the Wilkins Building to form the 'square within a square' remain part of the proposals. These will continue to cause harm to the Grade I listed building and are not adequately justified.

**THE TWENTIETH CENTURY SOCIETY:**

Maintains strong objection. Welcomes engagement and some suggestions have been taken on board, including the retention of the Egyptian and lozenge columns. However, the majority of the design choices and issues raised previously have been carried over in this revised proposal which will involve substantial and unjustifiable harm to the grade I listed Sainsbury Wing.

**COUNCIL FOR BRITISH ARCHAEOLOGY:**

Any response to be reported verbally.

**SOCIETY FOR THE PROTECTION OF ANCIENT BUILDINGS:**

Any response to be reported verbally.

**THE GEORGIAN GROUP:**

Any response to be reported verbally.



**NORTHBANK BID:**

Support. The proposals are well considered and will bring forward numerous public benefits. Attracting new members with internationally comparative facilities will ensure the gallery is able to stay world class in changing world. Enhanced working spaces for staff and researchers along with improved research, seminar and reading rooms will ensure the gallery is able to continue to attract talented and creative staff working from a contemporary, healthy and sustainable environment. The proposals to enhance visibility both of the Gallery entrance, its internal art collection and research facilities along with the quality and experience of the public realm are very much welcomed.

**TRANSPORT FOR LONDON:**

Original comment maintained.

**LONDON UNDERGROUND:**

Original comment maintained.

**BUILDING CONTROL:**

The submitted Basement Construction Method Statement and Basement Impact Assessment submitted are satisfactory and meet the requirements of Basement Development in Westminster.

**ARBORICULTURAL SECTION:**

No objection. Undesirable regarding the loss of symmetry because of the loss of part of the lawns given in this instance the landscaping frames the very formal architecture of the Wilkins Building, and the overall reduction of the soft landscaping is also undesirable. There are now no new trees proposed. However, the initially proposed tree planting appeared likely to obstruct the Wilkins Building and so in this circumstance it could be considered preferable to omit trees from the landscape design. The proposed landscaping shows the existing box hedging around the inner edges of the lawns to be retained. A condition seeking the retention and protection of the lawn and hedge could be beneficial.

**ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED**

No. Consulted: 133

Total No. of replies: 71

No. of objections: 7

No. in support: 63

No. neither in support or objection: 1

***Objections***

In summary 7 residents and other interested parties object on the following summarised grounds:

**Heritage Impact and Design:**

- Maintenance of previous objection on the grounds that the proposals will harm the interior of the Sainsbury Wing, and the revisions do little to reduce this harm;
- The proposals disregards the original design of the entrance, colour code and glazing having a detrimental impact on the Sainsbury Wing;
- Demolition of a significant portion of the wall of the Grand Staircase is unjustified;

- The Sainsbury Wing entrance lobby is intentionally low and compressed, opening it up by removing parts of the first floor slab and columns is therefore harmful;
- The alterations harm the original design intention of the gates to the Sainsbury Wing;
- Relocating the Egyptian columns to the new shop is inappropriate for them and does not make coherent architecture;
- Denise Scott Brown is opposed to the proposals;
- Historic England's original comments have been ignored;
- The proposals to the Sainsbury Wing would completely nullify Venturi and Scott Brown's original design intent, and the building and its architects are greatly admired;
- The previous proposals to alter the Wilkins Building portico entrance should be revisited and it should be the main entrance;
- The proposals will irreversibly alter the character of the Sainsbury Wing in order to provide an espresso bar and cafeteria;
- Great architects have emphasised the intense experience of moving from dark to light spaces;
- The proposals for the Sainsbury Wing feels as though a modern building is being jammed into it, and it would undermine the thoughtful sequence of spaces in the building;

#### Landscaping and Public Realm:

- The public realm designs are banal and the proposed LCD signage to the front would harm the entrance of the Sainsbury Wing;

#### Other:

- The proposals would set a negative precedent.
- Westminster City Council should have refused the applications following the negative responses by Historic England and the Twentieth Century Society - and other prominent people – rather than working with the National Gallery on revisions.

#### *Support*

In summary 63 residents and other interested parties support on the following summarised grounds:

#### Heritage Impact and Design

- The existing Sainsbury Wing lobby is dark, compressed and oppressive and not in keeping with the rest of the building, or reflective of the collection, the proposals are an improvement;
- The existing Sainsbury Wing lobby is not a suitable arrival point, beyond lack of light and height, it fails to convey any drama or excitement suitable at for arrival at a major destination;
- The existing Sainsbury Wing lobby is overcrowded and proposals to provide more space and are welcomed;
- The existing Sainsbury Wing gates are heavy (forbidding) which these proposals would improve;
- The proposals enhances the appreciation of the grand staircase;
- The replacement of the dark glazing to the eastern side of the Sainsbury Wing will bring more light into the building and improve the sense of openness and welcome;
- The removal of part of the first floor slabs within the Sainsbury Wing will improve the sense of openness and welcome;
- The removal of clutter within the Sainsbury Wing will improve the space;

- The functional parts of the Sainsbury Wing should not be preserved in aspic and modifications are required to improve Sainsbury Wing as the main entrance;
- The alterations to the buildings are subtle and well-orchestrated and are in keeping with the original architecture of the buildings;
- The proposals will better reveal the heritage assets;
- The architect for the proposals (Annabelle Selldorf) has a body of work demonstrating her skill, particularly in the art and cultural sectors;
- Signage would make the entrance clear and more legible;

#### Public Realm:

- The removal of the walled enclosure to western end of the Wilkins Building will allow the Sainsbury Wing to be better appreciated, while allowing underused parts of the Wilkins Building to be brought back into use;
- The symmetrical frontage of the Wilkins cannot be fully appreciated, and the public realm works would positively benefit the public and setting and improve legibility and accessibility in the area;
- The proposals would improve the relationship between the buildings and Trafalgar Square;

#### Land Use:

- The proposals are necessary for the National Gallery to achieve its full potential to attract visitors/ tourists to the National Gallery and London more widely;
- The number of visitors and their expectations require changes to be made to the buildings on the site;
- Cafes etc work well in museums/ galleries work and including them here is helpful for visitors;

#### Access and Security:

- Welcome a singular equal access space, meeting the requirements of the Equality Act and building regulations;
- Equal Access at the Wilkins Building portico entrance have been explored and discounted as not feasible/ practical and the Sainsbury Wing is the best place for the main entrance to the site;
- Existing Sainsbury Wing has off putting security and external security which these proposals would help improve;
- The basement link would improve circulation through the buildings on the site;

#### Public Benefits:

- The proposals will help the National Gallery fulfil its core purpose and allow it to better contribute to the sector as a whole;
- The proposals result in increased community provision;
- Improved education centre and research facilities;
- Increased opportunity for the Gallery to generate income;
- Will improve the experience and enjoyment of visitors, including disabled visitors, and will increase the diversity of the Gallery's audience including the local community;

#### Other:

- The original donors for the Sainsbury Wing have been kept informed and support the proposals as a sensible and sensitive response;



- Kings Charles's interference changed the path of the Sainsbury Wing and this resulted in the building being compromised, it was a highly political solution on a contested site, and the proposals addresses this;
- The objections are made by a small group of architects representing a small percentage of the nation, opposing works which would improve the National Gallery;
- The National Gallery appointed the correct architect and the other proposals in the competition would have involved far more dramatic changes;
- The applicant/ architect has engaged widely with the community/ stakeholders and has taken on board their suggestions;
- The project will not use public money.

*Neither in support or objection*

In summary one resident states neither support or objection to the application but raises the following query:

- How would the two statues (King James II and George Washington) outside the National Gallery on the lawns be affected? The UK government is keen that public art is "explained" as well as retained. Will there be any plaque, label or other interpretation of either statue celebrating two men with links to the enslavement of Africans? It seemed a miss opportunity, if not, and one at odds with statements by DCMS and Historic England, among others about so-called "contested heritage".

## 5.2 Applicant's Pre-Application Community Engagement

The National Gallery carried out engagement with the local community and key stakeholders prior to the submission of their planning and listed building applications 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
Design team selection process	Early 2021	55 international teams at first stage	Six teams were shortlisted in April 2021, Selldorf Architects were selected on 14 July 2021
Letter to key stakeholders about the appointment of Selldorf Architects	July 2021	n/a	Early concepts were developed
Phase one public consultation including public exhibitions, webinar and dedicated website advertised by flyer to 17,000 local addresses, social media ads, local newspaper ads and separate emails and letters to other key stakeholders	Feb 2022	122 people attended exhibition sessions, 43 online survey responses and 29 written feedback forms received.	Some support for alterations to the Sainsbury wing and research areas, particularly improving light and connections in the gallery. Need to protect queuing customers, Portico should also be used as an entrance/ exist. Opposition for the foyer to be used for other uses.
Phase two public	May to June	68 people	Some support for 'square within a

consultation. Similar methods/ events used to engage stakeholders, residents and community organisations as with phase one.	2022	attended exhibition sessions, 14 online survey responses and 2 written feedback forms received.	square' concept, improvement to visitor amenities and entrance including queuing. Suggestion of hard landscaping, tress and benches on the North Terrace.
The Kaizen Partnership consultation. Including broad outreach and community research, workshops with engagement groups	Broad outreach Nov-Dec 2021 and Workshops Jan Mar 2022	Engagement groups worked with 70 people from different backgrounds.	Changes would make the gallery more welcoming and inclusive. Would make the entrance brighter. Having greeters in front of security would help. Most consider trees an improvement.
Discussions with other groups and statutory consultees	Various dates	Various	Various

In summary, across the range of engagement undertaken by the applicant the following principal issues raised were:

- Access through the Gallery could/ should be improved, including potentially re-opening portico entrance and replacing Sainsbury Wing stair with lifts;
- Design of the entrance/foyer space at the Sainsbury Wing;
- Navigation to and through the Gallery could be improved;
- Improvements to exhibition spaces should be considered;
- The existing buildings could improve catering offering;
- Concern regarding planting trees outside of the Gallery and obscuring it;
- The proposals should ensure visitors are protected if queuing outside;
- Lack of natural light in existing buildings;
- Existing buildings requires improved toilet facilities;
- The alterations should improve the building's energy performance;
- Existing buildings required improved cloakrooms;
- Need for a new bookshop;
- Public access to research areas should be considered;
- Jubilee Walk should be improved as part of the proposals;
- Alternative public entrances should be provided;
- Members space could be designed differently; and
- Could use some of the existing exhibition spaces better

The applicant's Statement of Community Involvement and other application documents indicate that the scheme has been developed in light of the comments received. The Statement of Community Involvement sets out a detailed response to each of the key issues raised, explaining the rationale for proposals and the improvements they have made to the proposals.

As set in section 8 of this report, the applicant further developed their proposals during the course of the application following concerns raised by various interested parties.

## 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) (July 2021) and should be afforded full weight in accordance with paragraph 219 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 49 of the NPPF, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise.

## 6.2 Neighbourhood Planning

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

## 6.3 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 (July 2021) unless stated otherwise.

## 7. BACKGROUND INFORMATION

### 7.1 The Application Site

The National Gallery is of international importance, housing one of the most significant art collections in the world. The National Gallery has charitable status, is a non-departmental public body and its art collection belongs to the government on behalf of the public. It houses the national collection of paintings in the Western European tradition from the 13th to the 19th centuries. Entry to its main collection is free and it is one of the most visited art museums in the world. The core aim of the National Gallery is *“to care for the collection, to enhance it for future generations, primarily by acquisition, and to study it, while encouraging access to the pictures for the education and enjoyment of the widest possible public now and in the future.”*

The National Gallery is located on Trafalgar Square, which is of intense heritage importance and an internationally recognisable place with immense cultural significance – it is one of the world’s great urban spaces. It has been and remains today the setting for events and celebrations that have shaped history. The National Gallery’s main building is the square’s most prominent building.

The main gallery building, designed by William Wilkins, was built between 1832-38 and was grade I listed in 1970. The Sainsbury Wing, designed by Venturi, Scott Brown and Associates, was built between 1988-1991 and was grade I listed in 2018. The square



itself is a grade I registered park and garden, with the grade I listed Nelson's Column Monument as the focal point. The square contains or is bounded by other listed buildings and structures. This includes the grade I listed Statue of James II and grade II listed statue of George Washington on the lawns outside the Wilkins Building, as well as other listed statues around square, listed street furniture, listed steps and listed terrace walling forming the square. In terms of significant listed buildings in the vicinity, the adjoining National Portrait Gallery to the north is grade I listed, the Church of St Martin in The Fields to the east is grade I listed, Canada House to the south is grade II\* listed, South Africa House to the east is grade II\* listed and the Former United University Club as well as a terrace on Whitcomb Street to the west are grade II listed. The area forms the Trafalgar Square Conservation Area.

The site is within a tier 1 archaeological priority zone, Lundenwic and Strand, which was one of only a handful of major Middle Saxon international trading emporia in England. Lundenwic is of national and international significance for the study of Anglo-Saxon settlement patterns, governance, commerce and economy. The National Gallery site is also on or adjacent to the remains of the former Royal Mews which went through various iterations in form from 1200s onwards.

The site is within the Central Activities Zone, West End Retail and Leisure Special Policy Area and the West End Strategic Cultural Area. The site is within the largest cluster of cultural and entertainment uses in the country, including Theatreland, Trafalgar Square, the National and National Portrait galleries and Somerset House.

## 7.2 Recent Relevant History

On 8 August 2017, the City Council granted planning and listed building consent for the removal of existing structures and the erection of infill extensions to the Sunley and Belvedere lightwells, to provide additional Class D1 floorspace, and associated rooftop structures and other internal and external alterations. (RN: 17/03151/FULL and 17/03152/LBC)

On 19 June 2019, the City Council granted planning permission and listed building consent for external alterations to roof, including the installation of two new rooflights and internal alterations to relocate artist studio, reconfigure existing office, studio and storage spaces, and to upgrade existing scanning and infrared studio. (RN: 19/03215/FULL and 19/03216/LBC)

On 21 May 2021, the City Council granted planning permission for the installation of hostile vehicle mitigation security bollards and raising of the height of the perimeter wall of the National Gallery. (RN: 20/06529/COFUL)

## 8. THE PROPOSAL

The National Gallery will be celebrating its Bicentenary Year in 2024/25 and the Gallery explains they see this as an opportunity for relaunching the National Gallery as a gallery for the nation and the world. The National Gallery proposes alterations to their buildings that they consider will help them achieve their goal to improve the visitor welcome at the Sainsbury Wing, improve the public realm, improve the education and research centres, improve circulation throughout the buildings, to create spaces for members and to

improve the energy performance of the buildings.

To achieve the National Gallery's aims, the applications propose internal and external alterations to the Wilkins Building, Sainsbury Wing and Pigott Education Centre. This includes remodelling of the external gates, replacement glazing and adaption and enclosure of the loggia of the Sainsbury Wing. External alterations to the Wilkins Building, including alterations and part removal of the railings, lawn and wall to the front (western end), in connection with the formation of a new entrance on Trafalgar Square to the Research Centre and Members Rooms. Excavation underneath Jubilee Walk is also proposed to allow the creation of a new basement link between the Sainsbury Wing and Wilkins Building. Public realm works outside the front of the Sainsbury Wing, Wilkins Building and within Jubilee Walk are also proposed, and this would include new paving, benches and bollards. Fenestration alteration and other external alterations to Pigott Education Centre on Orange Street, which is to the rear of the Wilkins Building, is also proposed.

There are numerous internal alterations proposed to the Sainsbury Wing, Wilkins Building and Pigott Education Centre. Most prominently, the internal alterations to the Sainsbury Wing include cuts into the first flooring slab to create more openness, the alteration to internal columns and removal of internal walls. To the Wilkins building, internal alterations include new or enlarged openings, the removal of some partitions and changes to stairs and a new platform lift, amongst other modifications. The reconfiguration of the Pigott Education Centre is also proposed which would include openings into the first flooring slab to draw more light into the building.

Historically, the primary entrance of the National Gallery was through the portico of the Wilkins Building. When the Sainsbury Wing was completed, it became used as a second main entrance. In 2018, the National Gallery changed their operations and the Sainsbury Wing entrance became the only main entrance – and this remains the case today. This was in large part because of the limitations at the Wilkins Building entrance which the Gallery have found to become ill-suited for its original purpose. The Sainsbury Wing has better capacity to handle security checks and it is accessible to all visitors (the portico entrance includes steps and space is more limited within the entrance lobby). An aim of the alterations to the Sainsbury Wing therefore is to improve this entrance in terms of functionality and in terms of visitor experience so it can better serve as the principal entrance to the National Gallery.

During the course of the application, the applicant revised their proposals following concerns raised by objectors and other interested parties regarding the degree of harm that would be caused to the significance of the listed buildings. In summary the applicant made following amendments to the original proposal:

**Revisions to the Sainsbury Wing:**

- The internal screen walls within the Rotunda at the Main Floor level retained, rather than removed as originally proposed.
- Two large/extended rusticated columns (pill shaped) moved one structural bay to the west. The style, profile and limestone finish of these columns is to be replicated at first floor so that the columns become continuous over two storeys.
- All six of the Egyptian style columns relocated to be part of the design of the new bookshop within the ground floor lobby.

- The remaining structural columns within the ground floor of the entrance Lobby are reclad with Pietra Serena stone with a brush hammered finish, to match the stone used for the columns on the main gallery floor.
- The base detail of the columns to match the detail of the existing round columns within the Entrance Lobby. (Non-structural columns to be removed)
- The first-floor structural columns to be clad in Pietra Serena stone with the same finish.
- The exposed first floor slab edge will be clad in Pietra Serena stone or similar with a rock-faced rusticated finish.
- The glass balustrade to the first floor slab edge will be a misted glass finish without a handrail or metal framing and set back from slab edge.
- The rusticated limestone finish to the west face of the stone wall between the lobby and the stair is to be extended to the full two storey height of the wall.

#### Revisions to the Public Realm:

- The proposed trees within the lawns to the south of the National Gallery are omitted;
- The colour and finish of the external gates proposed to be dealt with via condition;
- Amendment to the arrangement of bollards at the west end of the North Terrace of Trafalgar Square.

The proposal would result in a gain of floorspace at the basement level of the Sainsbury Wing through the construction of the basement link and at ground floor level of the Sainsbury Wing through the extension of the entry vestibule. However, reductions in floorspace occur where openings in the slab are created to the first floor of the Sainsbury Wing and the Pigott Education Centre. Overall, these reductions outweigh the gains to produce an overall reduction in floorspace, as set out below.

**Table: Existing and proposed land uses.**

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	+/-
Gallery (Class F1)	22,018	21,714	-304

## 9. DETAILED CONSIDERATIONS

### 9.1 Land Use

The proposals seek to improve the National Gallery, in particular the experience of visitors, and to enhance the public realm around the National Gallery. The City Plan encourages the improvement of buildings of international importance within the city and seeks to maintain and strengthen Westminster's strategic role within the London tourist industry and seeks to help contribute to local opportunities to experience arts and culture – as set out in City Plan Policies 1, 15 and 17. In land use terms therefore, the principle of improving the National Gallery is supported and encouraged.

In this case, there would be a loss in floorspace overall because of the proposed cuts into parts of the floor slabs to create double height spaces. However, in the context of the site as whole (22,018 sqm GIA), the loss (304 sqm GIA) in floorspace would be relatively modest. The areas lost are ancillary areas and are in connection with

improvements to the internal environment of the National Gallery for visitors and to allow it to better fulfil its core purpose. Further, the extensions permitted in 2017 (see section 7.2 of this report), which the National Gallery have recently completed, increased the floorspace on the site by 1,062 sqm GIA. The National Gallery explains that those extensions and the current proposals are part of a phased programme of improvements to the National Gallery site to ensure it can continue to be a world class gallery.

The alterations to the Sainsbury Wing would improve security and provide more space and openness for visitors entering. The National Gallery explains better circulation and orientation space within the Sainsbury Wing lobby is required particularly because the Sainsbury Wing has become the only main entrance and because the National Gallery now enjoys over a thousand visitors an hour in peak summer times and approximately 6 million total annual visitors at an entrance the National Gallery explains was designed for no more than 3 million. An objector queries the figures given by the National Gallery stating they are inconsistent with central government figures for museum and gallery visits, however the figures provided in the 'Sponsored Museums and Galleries Annual Performance Indicators 2017/18' document published by the Department Cultural Media and Sport show them to be accurate. While of course the COVID-19 pandemic will have significantly reduced these figures, they are recovering.

Because of the high number of visitors, queuing externally outside the entrance is a common occurrence which these proposals would help mitigate by allowing the creation of a new internal security vestibule. Security checks currently occur externally (under the loggia) which represents a quality of welcome ill-fitting for the importance of the National Gallery. The alterations also seek to improve legibility for visitors, make better circulation through the building and improve the welcome in the lobby.

Some of the alterations to the Wilkins Building focus around improving the research centre, and in association with creating a basement link with the Sainsbury Wing. This would help the Gallery continue to deliver part of its core purpose of researching and educating the public on some of the world's most significant art pieces. The alterations to the Wilkins Building also create a new member's area which would allow for dining and event spaces to be created for paying members of the National Gallery. This element would be more commercial in nature therefore, and the Council's City Plan appreciates that such activities can help arts and cultural facilities to attract additional visitors and generate income to fund their core activities. In this case, the new member's area would not dilute the primary arts function of the National Gallery or compromise its operation given it would be formed in an area left underused by the relocation of staff to the recently built extension permitted in 2017. Given the main gallery spaces and other core areas of the National Gallery would be unaffected, the member's room element is appropriate in land use terms.

Some objectors have raised concern regarding the introduction of an espresso bar on the ground floor of the Sainsbury Wing and the replacement of the restaurant at first floor at the Sainsbury Wing with a café of a reduced size, in particular questioning the need for these facilities. Again, these are not core activities of the National Gallery, but these commercial elements can help generate income to fund the core activities of the National Gallery. These elements would cover a small proportion of the Sainsbury Wing floorspace in areas of the building already used for ancillary activities (the shop on the ground floor and restaurant on the first floor). Therefore, there would be no dilution of the

core arts and cultural facilities on the site as a result of these ancillary uses.

The alterations to the Pigott Centre include improving the welcome at this entrance, and the altered layout would help better deliver the function of this part of the site – which is to provide education, particularly to young people. Updating this part of the site would help the National Gallery better deliver one of its core aims of allowing people to explore and learn about its collection in an more welcoming and fit-for-purpose space.

The proposals would also enlarge the public realm outside the National Gallery, improving the entrance experience for visitors and providing additional public realm for Trafalgar Square. This space would be an addition to the North Terrace which could be used and enjoyed by all members of the public, whether they are visiting the National Gallery or not.

### **Land Use Conclusion**

Overall, the proposals accord with the City Plan's land use objectives through improving one of the world's most significant art galleries to better allow it to provide a welcoming environment for visitors, to better allow it to carry out research, to allow it to generate further income to support its core activities and to allow it to better provide educational opportunities. These improvements represent significant and weighty public benefits. The impacts of the various elements of the proposals are expanded upon in subsequent sections of this report.

## **9.2 Environment & Sustainability**

### **Energy Performance**

City Plan Policy 36 promotes zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources. Policy 38 requires development to adhere to the principles of sustainable design, including reducing energy use and emissions and ensuring the reduction, reuse or recycling of resources and materials. The City Council's Environmental SPD details guidance on environmental and sustainability matters.

Because the application does not involve the creation of a significant amount of new floorspace, the requirements of the City Plan and London Plan in relation to a full Energy Strategy do not apply. However, the applicant has included within their sustainable design statement detail of their approach to the design to maximise energy efficiency and minimise carbon emissions in line with the energy hierarchy.

The proposals involve upgrades to the existing building's fabric, principally upgrading glazing which, would improve the building's energy performance. The internal alterations also expose the thermal mass of the building, and the statement concludes this will help to maintain a stable temperature in the building and therefore reduce energy demand. The proposals involve the installation of efficient lighting and lighting control, utilising LEDs and sensors, and the internal upgrading the ventilation system to allow it to operate more efficiently. The internal upgrading of the building's services would not involve the addition of new/ replacement external plant equipment or other external alterations. Indeed, the roofs of the buildings are outside of the scope of this application

and the proposals do not involve the installation new equipment such as photovoltaic panels or heat pumps. The statement estimates the measures the applicant proposes would reduce regulated carbon emissions by 19% in the Sainsbury Wing and 16% in the Wilkins Building.

The applicant's sustainability statement also explains how they have incorporated the principles of the circular economy into their proposals. This includes designing new elements for longevity, and elements that will need to be replaced could be reused and recycled. They explain they have sought to retain fabric rather than remove and rebuild, where this is possible and whilst achieving the National Gallery's objectives.

Overall, the improvement of the buildings' energy performance is welcomed and would constitute a public benefit given it would help the National Gallery reduce energy use and emissions.

### **Flood Risk & Sustainable Drainage**

The site is within Flood Risk Zone 1, which means it has less than 1 in 1000 annual probability of river or sea flooding (<0.1%) – which is low. Furthermore, Westminster is well defended from river flooding due to the flood defences in place on the Thames.

The City Plan identifies the site as within a Surface Water Flood Risk Hotspot. The hotspot is large and not all parts of the area is necessarily at high risk of surface water flooding. The applicant's site-specific flood risk assessment indicates that the site is generally at a very low risk of flooding from surface water. It concludes that because that levels on site will be in keeping with existing levels, the risk of flooding from surface water is negligible. Indeed, the new basement link would be formed off an existing basement level within the Sainsbury Wing.

In terms of drainage, the site includes several private drainage networks connecting the National Gallery to Thames Water sewers nearby. The applicant reports the proposals would maintain a similar discharge rate which is appropriate in this case given the relatively limited nature of the external works to the buildings and public realm. Thames Water agrees to the proposal of maintaining the existing surface water discharge rates of 9.3l/s. Thames Water have also provided advice regarding sewerage infrastructure which is added as an informative, and they require a condition to require the applicant to provide details of piling in order to ensure that it does not damage sewerage infrastructure.

Consequently, the proposals are acceptable in terms of flood risk and drainage.

### **9.3 Biodiversity & Greening**

City Plan Policy 34 states that, wherever possible, developments will contribute to the greening of Westminster by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme. Developments should also achieve a biodiversity net gain, wherever feasible and appropriate.

The National Gallery site currently has limited amounts of planting. Six trees are located at the end of Jubilee Walk, by St Martin's Street, and there are lawns to the front of the



Wilkins Building. These lawns are largely symmetrical and well kept. The application proposes to reduce the western section of the lawn to allow for a new entrance into the Wilkins Building and to enlarge public space in this area. This aspect of the scheme is further discussed in later sections of the report (section 9.4 and 9.6)

Initially the application included proposals to plant new trees on the remaining lawns and potentially trees on Trafalgar Square. The applicant has since omitted these new trees their proposals. The City Council's arboricultural officer, the Victorian Society and others had raised some concern regarding the new planting, particularly because the new trees on the lawns would be in groups and could be incoherent and could grow to obscure the Wilkins Building.

The current proposals include retaining hedging on perimeter of the lawns alongside the boundary walls. While additional greening would have been welcomed in the context of Policy 34 and given part of the lawns are to be lost, the heritage sensitivity of the site must be recognised, and this limits the scope to achieve new planting.

## **9.4 Townscape, Design & Heritage Impact**

### **Legislation & Policy**

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

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that "In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

Section 66 of the same Act requires that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

Section 72 of the same Act requires that "In the exercise, with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

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 only be approved where the harm caused would be clearly outweighed by the public benefits of the scheme, 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 policies 38, 39, 40 and 43 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: With regards to listed building, part (G) states that: Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric.

Part (K) Conservation Areas, states that development will preserve or enhance the character and appearance of Westminster's conservation areas. (L) goes on to states 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 (D), states that alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster's distinctive townscape.

Policy 43 Public Realm, part (A) explains 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.

### **Sainsbury Wing**

The Sainsbury Wing's Portland stone façade is articulated by pilasters and blind windows along its folded form, which were purposefully designed to respond to the classical architecture of the Wilkins Building to the east, whilst introducing a post-modern vernacular. This is evident as the facade expresses a simpler order along its southern façade. Here a substantial multi-paned picture window overlooks Pall Mall East and Egyptian deco style columns express the southern entrance apertures, which form part of a sequence of double height flat headed opening of various widths, which are protected by steel metal gates and railings. The western return of the building to Whitcomb Street is all together more functional, with a buff brick construction and very little architectural expression other than glazed shopfronts and modestly detailed windows above. The eastern facade of the building, facing Jubilee Walk, is composed entirely of an aluminium framed glazed curtain wall, which extends northward to a cantilevered stone rotunda which spans Jubilee Walk. On completion in 1991, the Sainsbury Wing was intended to provide a second entrance to the National Gallery, however, since 2018 it has been the sole main entrance providing street level access and has the capability of providing space for security measures. Containing sixteen

galleries specifically designed to house the Early Renaissance collection, this entrance arrangement allows a broadly chronological journey through the collection. The building also accommodates a shop (currently closed), public facilities, restaurant, and lecture theatre.

A large extent of the interior of the Sainsbury Wing is predominantly finished in Chamesson limestone, with rendered grey sandstone walls within the Gallery spaces. The gallery spaces, which are on the upper floors, are accessed by a monumental staircase which ascends the building along its eastern side.

As its grade I listing indicates, the building is of high architectural importance, its significance deriving from its post-modern style and the only example of Venturi, Scott Brown's work in the country.

Robert Venturi (1925-2018) and Denise Scott Brown (1931) met in 1967 and went on to design a number of buildings together and individually, including large numbers of houses, university buildings and art galleries, including Seattle (1991) and the Museum of Contemporary Art in San Diego California (1996). There are very few examples of their work outside of the United States. The Sainsbury Wing is recognized as being a significant example of a post-modern building by a leading architect of this movement.

They are well renowned for being theorists and for Venturi's early buildings that first defined post-modernism in the 1960s. Postmodernism began to be used as a term in architecture in the 1970s to classify the modern movement that incorporates references to older architectural traditions, and notably more aware of setting and context. This can be clearly appreciated in main façade of the Sainsbury Wing, which reproduces the Corinthian columns, cornice line, string course capitals of the Wilkins Building, in a manner which combines both the modern with traditional.

It is understood that Venturi & Scott Brown's vision for the building's interior was for it to provide one place of entry for the visitors, and for the eye to be drawn to the light and towards a 'unambiguous' staircase, which would lead to the gallery spaces and art above. It is understood that the materials of the stair and its wall were purposefully chosen to suggest an outside stair, but also were influenced by Italian architecture and mannerisms. The lobby of the building is often described as emulating a church crypt due to its low floor to ceiling heights and compressed quality, which is clearly an intentional feature for the visitor to experience. However, these design qualities bring with them functional challenges, which erode the visitor experience.

The defining significance of the Sainsbury Wing is an architectural one, as a recognised exemplary example of postmodernism and its intactness physically and conceptually. It also possesses historic interest largely due to the debate that surrounded its conception, including choice of architects and the style of architecture chosen for such a high-profile scheme. It also possesses group value with the neighbouring Wilkins Building, which is grade I listed in its own right, as well as with Canada House (grade II star) and the structures that form Trafalgar Square.

### **Sainsbury Wing Proposals**

The National Gallery have identified a series of constraints and challenges presented by

the current design of the Sainsbury Wing, exacerbated by an increasing number of visitors and the security requirements upon entry. They have identified that the space in which visitors enter the building is inadequate and its legibility poor: the entrance vestibule being more defensive than welcoming, and the lobby itself is poorly lit, with wayfinding hindered by columns which restrict views to the lifts and obscures the entrance to the theatre and temporary exhibition spaces. There are also spaces which are underused, with the restaurant at first floor level and the ground floor book shop having been redundant spaces for some time.

The current proposals have been amended during the course of this application and following initial consultation responses. As a result, certain aspects of the original proposal have been omitted or altered. These changes include the removal of the works inside the rotunda, the removal of trees from the lawns and reimagining the interior details of the ground floor lobby space, notably its materiality and aesthetic.

Internally, the proposals include a reconfiguration of the entrance vestibule, ground floor lobby and first floor former restaurant space, as well as the creation of a basement link to the Wilkins Building. The intention is to maintain elements of high architectural and aesthetic significance, such as its principal stone façade, notable interior details (such as deep cornices and rusticated wall finishes) and principal spaces such as the grand staircase and galleries, which will remain unaffected by the proposals.

To facilitate a more open and welcoming entrance, with improved security, the scheme removes the draft lobby and rotating doors, features which are entirely functional rather than exhibiting architectural or aesthetic value. In their place a clear glazed double height entrance vestibule will be installed which would lead into a newly configured ground floor lobby. The enlarged vestibule will provide a larger dedicated space for security measures and allow for queuing under the loggia, as opposed to the current situation where queuing extends along Jubilee Walk because the security measures are under the loggia. The introduction of clear glass to the frontage within the loggia will create a less defensive appearance and provide a visual connection into the building. Proposals also include reconfiguration of the entrance gates to both the entrance of the building and Jubilee Walk allowing the gates to fully retract back which will remove the need for the centre posts which restrict flow into the building. It is also intended to reduce the thickness of the gates and modify their colour to reduce their visual weight and improve their functionality. Whilst the gates are being modified, a large extent of their fabric and aesthetic is being retained, overall, their contribution to the significance of the building as an original feature fashioned by VSB will be somewhat diminished. Externally the alterations also include the replacement of the smoked glass to the curtain wall system in the east side of the wing, facing Jubilee Walk, with clear glass, allowing for more transparency which will allow external views of the grand staircase. To encourage pedestrian flow through the site from Trafalgar Square to Leicester Square, via Jubilee Walk, it is intended to reconfigure the existing gates allowing them to fold back completely to the walls of the Sainsbury Wing and Wilkins Building. Like the entrance gates, the Jubilee Walk gates will be reduced in thickness and their colour modified, thus their contribution to the significance of the building is somewhat diminished.

Moving internally, the lobby itself will be enlarged with the removal and reconfiguration of partitions which currently create back of house spaces and visitor facilities. Also

intended is the removal and repositioning of columns and the creation of two double height spaces, to the east and west of the lobby, by cutting back the first-floor slab.

The two double height spaces will allow more natural light into the central lobby area and allow visitors to glimpse the first floor, at the same time a sense of compression as you enter the lobby, a key feature of Venturi Scott Brown's design, is largely maintained. As part of improving both circulation and legibility, the proposals include the remodelling and removal of some of the structural columns, resulting in a more open lobby space. Some of the larger structural columns are to be removed, but where they are being reinstated, they will be reduced in size. The non-structural decorative Egyptian style columns, which featured in the former shop, are to be retained and repositioned within the new retail space.

The reconfigured basement, lobby and first floor will provide additional visitor facilities, such as new information points and signage, including a digital screen. Also, an espresso bar, lounge area, changing places, accessible WCs, providing street level facilities for the first time. A new book shop will be accommodated on the first floor alongside an informal cafe and bar. A new event space will also be provided on the first floor which will overlook the lounge area below.

The new finishes within the lobby intend to complement the existing materiality and character of the space without imitating the original details. The new structural columns will be re-clad in Pietra Serena sandstone, whilst the two larger double height lozenge-shaped columns that will be repositioned further west will be re-clad with rusticated limestone with granite skirts. Tying in with the materiality of the lobby, the face of the cut back slab will also be finished with a textured Pietra Serena sandstone. The glass balustrade above will be acid etched with a smoked finish to reduce its reflectivity.

Also proposed is a new basement level link between the Sainsbury Wing and the Wilkins Building, which will extend the footprint of the building beneath Jubilee Walk. This additional space will provide both a physical connection between the buildings and offer direct access to the research centre, as well as a space for additional visitor facilities.

From a listed building and townscape perspective the basement link will be connected to areas of moderate interest and will not diminish the understanding of the internal plan form and spaces of both buildings. On the surface, the basement will have no external features.

### **Impacts and Assessment of Harm to Sainsbury Wing**

The architectural and aesthetic significance of the Sainsbury Wing derives from it being a prominent and notable example of Post-Modern architecture by the highly influential architectural practice of Venturi Scott Brown Associates. This significance is expressed both to the exterior – notably the rippled stone façade to Trafalgar Square -and the interior. In the case of the latter, notable elements include the internal plan form particularly the gallery spaces, as well as significant architectural features such as the grand staircase and interior features such as the rusticated stone dressings. There are however elements within the lobby and first floor which are deemed more functional than aesthetic, such as the modern reception desk, lighting, partitions, ceilings, floors, and glazing, which are considered of medium to low aesthetic value and architectural

significance.

A modest degree of the original Venturi Scott Brown scheme, including plan form, internal and external fabric, will be affected by the proposal, but only at lower ground, ground and first floor levels. These areas are generally more functional in character and for the most part felt to possess a moderate to low level of significance.

It is however acknowledged that some original fabric will be lost, such as the coverings to columns and most notably parts of the first-floor slab, which will see the removal of the floor and the wall and windows above the base of the principal stair. However, notable decorative elements such as the deco columns are being retained and repositioned within the lobby space, and the rusticated details of the columns will in some instances be replicated.

The tinted glazing installed within the entrance and along the eastern façade is understood to have been a function choice, rather than an aesthetic one, therefore whilst the clear glazing will alter the appearance of the building, it is not felt to affect the architectural significance of the building.

Given the loss of some significant fabric, and the impact on the original plan form, overall, the proposals to the Sainsbury Wing are considered to cause less than substantial harm to the significance of the building.

### **Consultation Comments and Objections Regarding Sainsbury Wing**

Numerous objections, including from the Twentieth Century Society, have been received in reaction to the proposed works to the Sainsbury Wing on the grounds of harm to the grade I listed building.

Some of the concerns raised by The Twentieth Century Society (and others) including the loss of the Egyptian columns and lozenged-shaped columns, have been addressed by the amendments. However, the Society (and others) maintain their objection on the grounds of the proposals involving substantial and unjustifiable harm being caused to what is an internationally important post-modern building by renowned architects.

The Twentieth Century Society have classified the harm to the building as substantial. Substantial harm is a high test and would typically involve a serious and significant loss of significance.

Historic England's initially expressed concerns with regards to proposed internal alterations have largely been addressed by the revised proposals, but they also initially raised concerns that a realisation of the Gallery's objectives came at the expense of the original internal character of the Sainsbury Wing lobby – as a space rich in details and texture and that there was a need for a more careful balance.

In their comments received following the second round of consultations. Historic England acknowledged that the dialogue between the new works and existing character of the internal spaces have been handled in a way which is more supportive. They consider these changes along with a greater retention of existing features as more positive. They conclude that the proposals will cause some harm to significance, which in line with the



NPPF they categorise as less than substantial.

They go on to conclude that the benefits identified include improved accessibility across the site, enhanced security, improving the presentation and functionality of the Gallery – a public building which relies upon visitor numbers to support its operation. These are considered persuasive public benefits which both justify and outweigh the level of harm proposed (this is expanded upon elsewhere in this report).

Historic Buildings and Places, and other objectors, have questioned why the original nineteenth century entrance cannot be reinstated to avoid the intervention to the Sainsbury Wing.

The Sainsbury Wing has however been an entrance to the Gallery since its opening and became the sole main entrance to the collection in 2018. It is understood that reinstating the main entrance at the portico of the Wilkins Building has been considered on numerous occasions in the past and rejected by the Gallery, most notably because of the prevailing advantages of using the Sainsbury Wing as the main entrance: namely that it is an accessible entrance (the portico has steps) and has the capability to provide the necessary space for security. And because of the practicality and feasibility of providing an entrance with the same characteristics elsewhere. For the portico entrance to provide the same benefits (particularly equal access and more space internally), the National Gallery would have to propose more significant internal and external alterations than that which they propose to the Sainsbury Wing under this application. Furthermore, as the Sainsbury Wing was specifically designed to house the early Renaissance collection of the Gallery, its role as the principal entrance has the beneficial effect of allowing a chronological journey through the collection. As such the National Gallery consider reinstating the historic main entrance to the Wilkins Building as the Gallery's main entrance is neither practical nor feasible.

Many comments have been received which highlight that as a grade I listed building with considerable architectural significance, the Sainsbury Wing's grading means the greatest weight should be given to its conservation. Similarly, there are objections on the grounds that the proposals compromise the original architectural intent of the designers and thus cause harm to significance and should be rejected. Notable amongst these concerns are the changes to the ground floor entrance lobby – where the intentionally compressed nature of the lobby is eroded and its relationship and experiential qualities with the grand staircase, taking the visitor directly to the gallery spaces above is compromised.

There are of course numerous elements of the Sainsbury Wing which have been identified as being of high significance, including the facade, principal staircase, and galleries, which will be largely unaffected by the proposals. Still, the alterations to the entrance loggia, vestibule and lobby will affect original fabric and how visitors navigate and experience the building. However, in many cases these areas and fabric are predominantly functional in character and of modest to low architectural and aesthetic interest. Nevertheless, it is accepted that the alterations to the lobby space do impact areas of high architectural significance.

It is acknowledged that the cutting back of the first-floor slab creating two double height voids is a significant intervention, resulting in the irreversible removal of original fabric

and modifying the original floor plan, creating a volume between the lobby and stairs which was not originally intended. Likewise, the removal and reconfiguration of the columns will alter the spatial quality of the lobby. Both sets of alterations erode the compressed experience envisaged in the original design. On the other hand, the interventions enable the influx of natural light into the lobby and will improve the functionality of the spaces as well as creating additional spaces. This is hugely beneficial for the visitor experience in terms of navigating the lobby and providing the gallery with additional well-designed and functional spaces within these communal areas to support the primary functions of the National Gallery, which fundamentally relies on visitors and whose core purpose is an institution for the public. Aesthetically, the carefully considered material palette of complimentary natural materials exhibiting muted tones and textures, avoids replicating the original interior, whilst being respectful to the original design intent of the building.

The Planning Practice Guidance (PPG) advises that “in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.”. With regard to the Sainsbury Wing this is not felt to be the case. Some elements affected by the proposals, such as the lobby columns, first floor slab and first floor retaining wall to staircase do make a moderate contribution to the significance of the building, however their loss or alteration is assessed to not seriously affect the building’s overall significance. The officers assess the level of harm to the Sainsbury Wing as being a moderate degree of less than substantial harm.

Nevertheless, any harm, particularly to a grade I listed, should be avoided and to accept it will require clear and convincing justification and in the case of less than substantial harm must be weighed against the public benefits.

According to the PPG, public benefits may follow from many developments and could be anything that delivers economic, social, or environmental objectives. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit. Securing the optimum viable use of a heritage assets in support of its long-term conservation is considered a public benefit.

### **Wilkins Building**

Designed by William Wilkins in 1831, the Wilkins Building was completed in 1838 to house the Angerstein Art Collection, comprising 38 paintings, purchased by the government in the 1820s. The building was designed to ‘command’ the north side of the newly conceived Trafalgar Square and comprises lower ground floor, ground floor and first floor which houses the galleries. The building is in a classical Graeco-Roman style and features a central two-story portico with pediment and fluted Corinthian columns, which was originally the main entrance to the gallery. The building has been extended numerous times, firstly in the 1860s then notably by EM Barry in 1870. Over the last century extensions have infilled the courtyard and created galleries to the north and the Pigott Education Centre (1975). In 2003 the setting of the building was significantly altered with the creation of the pedestrianised terrace to the north of Trafalgar Square.

Grade I listed in 1970, the building is nationally important as a building of great architectural and historic interest. Its high significance derives from its function as the home of a national art collection as well as its architectural and historic value.

### **Proposals to Wilkins Building**

The proposals are limited to the western corner of the Wilkins Building, affecting its internal arrangement, facade and perimeter wall and lawn. These works will also facilitate the creation of a new public space. The western wing currently houses former staff offices, library and research centre. Currently access to these spaces is via a stepped staff entrance, meaning the spaces are largely inaccessible and visually concealed from public areas of the gallery.

Following the completion of the extensions permitted in 2017, staff have been relocated to the new office space leaving the former staff areas underused. The ground floor offices include high quality interiors, whilst the lower ground floor spaces, concealed by a high retaining wall, are more utilitarian with modern interiors. The ground floor areas have been altered in recent years and include both original and modern fabric, some of which has been designed to appear historic. The arrangement of the rooms has also evolved over time; however, the original plan form can still be understood. The lower ground floor spaces, which were originally intended as private apartments for the keepers of the Gallery, hence the courtyard and high retaining wall, have also been modernised but are not entirely without significance, and include architectural features of interest, such as brick-built arches and vaulted ceilings surviving in some areas and holding evidential value.

The intention of the proposals is to provide a suite of members rooms, as well as a dedicated entrance to the research wing, accessed directly from the enlarged public square. Internally the ground and lower ground floor rooms will be reconfigured to provide a self-contained set of rooms for members and entrance lobby with access from street level which internally will provide access to the exhibit spaces, research centre and event space. These alterations will predominantly affect fabric of medium-low significance, such as non-original partitions. A large extent of surviving original/traditional interior details will be retained and replicated within the principal spaces, and architectural features revealed. The contemporary additions such as the circulation space and staircase, which will connect the basement link from the Sainsbury Wing, will be introduced toward the rear of the floor plan within the southwest corner of the building, and will have a respectful and complementary relationship with the traditional rooms whilst clearly being contemporary.

A new fully accessible entrance to the members suites and research centre will be achieved by removing the tall retaining wall, railings, and lawn of the southwest corner of the Wilkins Building and remodelling of the lower ground floor façade. The façade of the lower ground floor is rendered brickwork and incorporates a variety of later windows. The finish and appearance of this part of the building is inconsistent with the high-quality original stone facade above. The intention is to remove the render and re-clad the facade with Portland stone ashlar and introduce a new string course to tie in with the facade above. As well as a new entrance door, the window arrangement is to be modified to align with the windows above. The simple detailing proposed aims to respect the

traditional hierarchy of the facade.

### **Impact and Assessment of Harm to Wilkins Building**

The southwestern corner of the Wilkins Building is architecturally defensive, which is an understandable attribute when the building originally faced directly onto a busy road. But with the removal of traffic from the North Terrace, this defensive quality does isolate the building from the public space immediately adjacent to it. It is also evident that the form and details of this corner of the build has evolved over time and is not of the same quality as the upper floors, and the retaining walls and railings have been altered from their original arrangement. The lawned area has been through a series of changes which have affected its form and appearance, originally enclosed by railings until the Second World War.

Notwithstanding the various alterations which have clearly taken place, there are elements of the fabric within the walls which are of evidential and historic significance, such as the cornice, doorframe and coping to the fire escape door on the western side of the basement retaining wall and most notably the railings above. Though a full unimpaired view of the facade of the Wilkins building is difficult to capture, the removal of the walls, railings and lawn will affect the perceived symmetrical composition of the Wilkins Building by exposing the lower ground floor facade which was never intended to be exposed. The removal of the retaining walls, railings and cutting back of the lawn, will result in the loss of historic fabric and alter the appearance of the building, causing a moderate level of less than substantial harm to the building.

The lawns to the front of the Gallery also provide the immediate setting of the grade I listed statue of James II and Grade II listed statue of George Washington. The latter is sited at the eastern end of the facade, and therefore its setting is unlikely to be affected by the reduction in the lawns at the western end. The James II statue is positioned on the lawn at the western end of the facade and whilst it will not be moved as part of the proposals, the extent of lawn will be reduced. The James II statue was originally located in Whitehall and was moved to its current site in 1948. The lawned setting of the statue forms a modest part of its wider setting which include the facade of the Wilkins Building and Trafalgar Square, which itself has gone through a series of changes since the statue has been in place. Therefore, the lawns are not felt to be a significant contributor to the significance of the statue, with its historic, aesthetic, and artistic values being unaltered by the proposals.

Internally the works respect aspects of the original layout and interior details, which is welcome. The contemporary additions avoid the more significant principal areas of the western wing and are overall respectful and complementary to the overall character of the interior. The internal reconfiguration of spaces will result in some loss of historic fabric, though overall the impact on the significance of the building will be modest, causing a low level of less than substantial harm.

### **Consultation Comments and Objections Regarding Wilkins Building**

Objections have been raised, notably from the Victorian Society, who oppose the removal of the part of the lawn ad the wall around the courtyard due to the impact on the symmetrical composition of the building. They also question the need for a new public

space, given the Gallery's position and access to Trafalgar Square and do not feel the public benefits of the scheme are sufficient to outweigh the harm being caused.

The alterations which seek to open the frontage of the western side of the Wilkins Building are required to provide access to the new research centre and members suites, which whilst not strictly public (only by appointment), are an important aspect of the the National Gallery's operation, particularly the world class research centre. The enlarged public space outside the gallery will benefit not only visitors of the gallery but the public at large. It could also allow for more/ improved events and activities to occur outside the buildings and increase public interaction with the National Gallery and its collections, which is one of the primary functions of the National Gallery.

### **Piggott Education Centre**

Constructed in the 1970's, the building makes a limited contribution to the overall significance of the National Gallery. The interior is of negligible significance, as such the exterior changes are of most relevance in terms of heritage impacts and from a townscape perspective.

Currently the building has an inactive street presence and is unwelcoming, which given its educational and public use, is disadvantageous. The introduction of new glazing/fenestration on the northern elevation, with a large picture window, would enliven the facade and create a more interactive frontage. Likewise, the replacement of the obscured dark glazing to the entrance with clear glazing will be more visually engaging and allow for a more active presence with a greater opportunity to promote the public functions of the gallery.

Internally the building is not considered to possess any notable features of architectural or historic interest, therefore the changes sought are not considered of concern from a listed building perspective but will be beneficial in improving the building's functionality and its public facilities.

### **Public Realm**

Public realm improvements sought within the setting of the Gallery include re-levelling of Jubilee Walk, creation of a new 'square within a square' between the Sainsbury Wing and Wilkins Building, new pavers, new seating, and the reconfiguration of bollards along the western edge of Trafalgar Square, a grade I registered park and garden.

A new public square is proposed to the north of the existing public pedestrian route and event space along the north terrace of Trafalgar Square. Described as a 'square within a square' the newly created space will be defined by a new paving design, composed of York stone, and provide a meaningful space for the sole use of the Gallery. The new paving is intended to complement the existing paving of Jubilee Walk where York Stone. This will also sit comfortably alongside the paving of the north terrace.

The public realm works will also facilitate improvements to the gradient and allow for level access to both the Sainsbury Wing and western wing of the Wilkins Building. The re-levelling of the public realm starts at the southern edge of the rotunda, retaining the existing steps and ramp.

Re-levelling Jubilee Walk and the area between the Sainsbury Wing and Wilkins Building is anticipated to improve and encourage flow between Trafalgar Square and Leicester Square through the Gallery site.

New seating will also be located parallel with the southern and eastern edge of the Wilkins Building, providing formal seating in place of the low-level retaining wall to the perimeter lawn, which is currently informally used as seating. The seating will be composed of the stone being removed from the retaining walls.

The proposed landscaping changes will not impact directly the historic and listed elements of the Square and will have a negligible effect on its setting. They will however provide a more accessible and functional space which will compliment both the setting of the Gallery and the Square.

### **Trafalgar Square Conservation Area and Registered Park and Garden**

The Trafalgar Square Conservation Area was designated in 1987 and extended in both 1990 and 1993. Trafalgar Square is a primary space of the conservation area and one of the world's great urban spaces used for numerous events and celebrations throughout its history. The conservation area is centred on Trafalgar Square but extends beyond the square towards Leicester Square and St Martins Lane to the north and northeast, Whitehall in the south and Strand to the east. These areas include large nineteenth and twentieth century buildings, commercial buildings as well as pockets of smaller scaled domestic buildings between, such as Whitcomb Street, Craven Street, and Chandos Place. The conservation area includes areas of distinct character, such as Whitehall, Strand, St Martins Lane and Craven Street, which are explained in more details within the City Council's Conservation Area Audit SPG. Trafalgar Square, which is a grade I listed Registered Park and Garden, and the National Gallery are key landmarks within the conservation area which make a considerable contribution to its character and appearance.

Trafalgar Square was laid out in the early nineteenth century, on the site of an enclosed Courtyard called Kings Mews. Designed by Sir Charles Barry and completed in 1840, the Square is surrounded by monumental buildings, the majority of which are statutorily listed, with the National Gallery pre-eminent amongst these. At the square's centre is the grade I listed Nelson's Column – an international landmark.

The proposals are not felt to detract from the character and appearance of the Trafalgar Square Conservation Area, nor harm the significance of the square as a grade I Registered Park and Garden. The contribution of Trafalgar Square, Sainsbury Wing and the Wilkins Building to the character and appearance of the area will be maintained.

### **Signage**

Currently the Sainsbury Wing has no signage on its stone façade. Flagpoles sit directly outside the Sainsbury Wing which hang both National Gallery and special exhibition banner signs. Signs have also in the past been attached to the entrance gates to the Sainsbury Wing.



The three poles are to be removed and replaced with two LED totem signs, one either side of the central entrance to the Sainsbury Wing at the base of the flanking pilasters. In addition, lettering reading 'Sainsbury Wing' will be carved into the stone facade above the central entrance aperture. Individual mounted letter's reading 'The National Gallery' will be installed along the frieze, with letters moulded to respond to the folds of the facade. The lettering will be lit externally from lighting fixed to the top side of the cornice below. A condition is imposed to secure further details of the lighting unit and its fixing to ensure it is visually discreet and causes minimal harm to the fabric.

Currently the flagpoles by virtue of their scale and position are visually intrusive and whilst they highlight the activities of the Gallery, they obscure the facade of the Sainsbury Wing, acting as both a physical and visual barrier. Their removal would therefore be beneficial. The replacement totem signs are considered more compact but will be illuminated. A condition is imposed which will restrict the content of the screens to Gallery related information and events and limit the frequency at which the images change.

The introduction of naming signage on the facade is visually and aesthetically subtle and complimentary to the host building, and highly beneficial in distinguishing and identifying the building. The new totem signs will be marginally more prominent due to their illumination, however overall, the extent of signage is considered more considered and will appear less cluttered. The signage proposals will not detract from the appearance of the building or negatively impact upon visual amenity.

### **Archaeology**

The site is located in a Tier I Archaeological Priority Area at the western extremity of Anglo-Saxon Lundenwic and over the site of the Royal Mews. City Plan Policy 39 relates to Westminster's heritage assets, which include archaeological assets. It says Archaeological deposits will be preserved in situ wherever possible.

Lundenwic was between present day Aldwych and Trafalgar Square and between the riverfront and Long Acre. The settlement appears to have been laid out in a grid pattern on either side of the Strand. Lundenwic was one of the most important of a small group of Middle Saxon emporium (port towns) and is considered a nationally, and indeed internationally, significant example of a thriving Middle Saxon trading centre which in places still possesses stratified deposits rich in structural remains, artefacts and environmental evidence. Remains of Lundenwic therefore have high potential to contribute to research. The settlement's putative boundary ditch may run through the site, but Historic England's Greater London Archaeological Advisory Service (GLAAS) does not consider these or other archaeological remains from this period are likely to be significantly harmed as a result of the basement excavation or other ground level works proposed under this applicaiton.

The Royal Mews are documented from 1273 onwards. The Mews appear on maps from the 1562 and the application site is located in the northwestern corner of that Mews site. Up until approximately 1530 the Royal Mews likely housed falcons after which they became stables in various iterations over the centuries. The main stable block - the Great or Royal Stables - were rebuilt by William Kent in 1732 and demolished in 1830 in preparation for construction of the National Gallery and Trafalgar Square. Historic

England's GLAAS originally raised significant concern that applicant's basement link could affect the buried remains of the Royal Mews. The applicant's field evaluation which included six trial pits on the site demonstrated that there is substantial survival of archaeological remains on the site relating to the Royal Mews. However, during the course of the application the applicant carried out further evaluation based on map regression which provided Historic England's GLAAS with comfort that the basement excavation would be located in what appears to have been a yard directly to the north of the Mews remains, rather than potentially cutting through it as originally feared. Because Historic England's GLAAS consider the buried archaeology to be a heritage asset of high significance, they had originally raised concern about the potential harm to it. But, on the basis of the new information which demonstrate the main part of the Great Stables would be avoided, Historic England's GLAAS advise that subject to appropriate conditions, harm to archaeological heritage assets can be appropriately mitigated and partially compensated for by public benefits arising from engagement and interpretation both during the investigation and in the completed development.

### **Heritage Impact Conclusions**

Objections have been received to these proposals from three of the national amenity societies and relating to the proposals both to the Sainsbury Wing and the Wilkins Building. These objections rightly identify harm to significance. As grade I listed buildings, they are designated heritage assets of the highest order, and any harm should be avoided. It is accepted that the proposals do cause harm to these assets, however, unlike the Twentieth Century Society, the level of harm is considered to be less than substantial - which is an assessment that accords with Historic England. The proposals could also harm archaeological assets as Historic England's GLAAS sets out.

No harmful impact is found to the character and appearance of the Trafalgar Square Conservation Area or to the setting of the listed statues on the front lawns of the Wilkins Building, nor would the proposals harm the setting of the very numerous other adjacent heritage assets on and around Trafalgar Square.

Considering all aspects of the scheme, the impact in heritage terms would be a moderate degree of less than substantial harm. Special regard must be given to the desirability of preserving listed buildings, but where a development leads to less than substantial harm, the NPPF states this harm should be weighed against the public benefits, including taking into account whether any conflict between the heritage asset's conservation and any aspect of the proposal has been avoided or minimised.

It is considered that the National Gallery have justified the interventions and harm caused; they have mitigated that harm and modified the scheme to address some of the concerns expressed; and it is considered that any residual harm is outweighed by the public benefits of the scheme.

With regard to the Sainsbury Wing, the interventions proposed will enable the gallery to function more efficiently, with improved security and accessibility. The changes to the lobby and first floor will enhance their functionality and improve legibility and enrich the visitor experience. The reconfiguration of the entrance and the external changes

proposed will also be hugely beneficial in animating the building and provide more of a visual connection into the building which has the potential to attract more visitors.

For the Wilkins building the benefits include providing a direct accessible entrance to the research centre and members suite, which includes archives, library, and lecture spaces. The public realm will be altered, and a new public space created at this western end of the Wilkins Building.

The balancing of the moderate degree of less than substantial harm that has been identified against the public benefits (identified in this and other sections of the report) can be found in section 10 of this report.

## **9.5 Residential Amenity**

Most of the buildings within the immediate vicinity of the site are non-residential. Residents do reside to the north-west of the Sainsbury Wing above the shops on Whitcomb Street (23 to 33 odds) approximately 35 metres from the north-west corner of the rear of the Sainsbury Wing and within Excel Court behind those buildings. A residential flat is recorded as being within the library on the junction of St Martin's Street and Orange Street, which is opposite entrance to the Pigott Education Centre. Some residential units can also be found on St Martin's Place, Cockspur Street and Suffolk Street.

City Plan Policies 7 and 33 seek to protect residential amenity, including in terms of light, privacy, sense of enclosure and noise and encourage development which enhances the residential environment, quality of life and health and wellbeing.

The nearby residential properties would not be impacted by the proposal in terms of overlooking, increase sense of enclosure or loss of light. The external alterations are not of a scale or location that would impact significantly on neighbouring residential occupiers.

The external alterations to both the Sainsbury Wing and Wilkins Building concentrate to the front of the buildings, facing Trafalgar Square, where it is a significant distance to the nearest neighbour. The external alterations to the Pigott Education Centre would introduce a new window facing toward the library, this window would be in an opening spanning from ground to second floor levels. It is understood that the flat within the library building is located at fourth floor level, which would be above the new opening so there would not be direct overlooking from the new window toward the flat, plus the distance across Orange Street is sufficient to prevent a harmful loss of privacy in any case.

In terms of noise and other local environmental impacts, the City Council's Environmental Health Team raise no concerns as the proposals do not involve the installation of new plant equipment which would require planning permission.

## **9.6 Transportation, Accessibility & Servicing**

### **Highway Impact & Public Realm Works**

City Plan Policy 24 requires new development to contribute towards maintaining and enhancing Westminster's places and streets as one of the most attractive and liveable areas in London. Policy 25 requires development to prioritise and improve the pedestrian environment and contribute towards achieving a first-class public realm. Policy 43 requires development to 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. Policy 44 requires development to incorporate appropriate security measures in the public realm.

The works to the public realm involve expanding the area to the front of the Sainsbury Wing entrance. Some objectors have questioned the need for additional public space on Trafalgar Square given it is a large public space already (and thereby question its weight as a public benefit). The North Terrace of the square does provide a large public space outside of the Wilkins Building, but outside of the Sainsbury Wing the public realm remains constrained by the carriageway of Pall Mall East, which was not pedestrianised when the North Terrace was in 2003. More public realm space outside of the Sainsbury Wing would improve the visitor experience and would improve this part of Trafalgar Square for the public at large.

'square within a square'. The proposals for this 'square within a square' would pave the area in York stone and would seek to literally demarcate a square using square-set York stone defined with a slim York stone banding. The applications also propose to alter Jubilee Walk including re-levelling whilst retaining the existing steps and ramp there. The gradient of Jubilee Walk is altered with the inclusion of flat landings to improve ease of accessibility across the slope.

The highway boundary is the existing building line, including up to the existing Jubilee Gates at both ends. This is because this area has been open and passable for at least the last 20 years. The highway boundary is different to the land ownership boundary marked on the submission drawings and includes some these areas, and so some of the highway by the Sainsbury Wing entrance is not maintained at public expense. The primary function of the highway, whether it is maintained at public expense or not, is the free and unobstructed movement of highway users – and the proposals would not conflict with this function, indeed more space would allow pedestrians to better traverse the area.

The submission documents outline the proposed hard landscaping at street level, including within the highway, which are to be funded by the National Gallery. Third party funded public realm improvements are welcomed by the City Council where they would benefit the public, and in this case the interventions would create an expanded public realm area for the public at large in one of the most important public squares in the nation. In addition to providing more space, new benches are proposed outside the Wilkins Building which would be a welcomed addition to this part of the North Terrace allowing the public to sit and enjoy their surroundings.

Overall, the principle of the interventions is welcomed from a highway and public realm perspective, therefore. At this stage however, the detailed design of the public realm works is not completed and this detailed design stage is best secured by legal agreement between the Highway Authority (in this case the City Council) and the National Gallery so that appropriate materials and detailed design is achieved.

Nonetheless, the Highway Planning Manager advises that for those elements which are within the highway, the details of the proposed hard landscaping included in the submission are consistent with the local highway network. The detailed design process would also ensure suitable drainage and lighting on the highway.

The proposals also detail Hostile Vehicle Mitigation bollards. The North Terrace has recently been protected by newly installed bollards which extend from the lawn in front of the Wilkins Building to the wall surrounding Trafalgar Square. This existing line of bollards would be undermined by the proposed alterations because the lawn would be partly removed (if the existing line were retained, vehicles would be able to circumvent the line). The proposals seek to remove the existing bollards, and replace them with new bollards which would resolve this and would defend the new 'square within a square' public realm area. The City Council's Prepare and Prevent Operational CONTEST officer has advised that the proposals are broadly acceptable from a security standpoint, as it is an appropriate response to the level of risk in this location.

The bollards and other associated measures would also need to be subject to detail highway design. The arrangement indicated on the submitted drawings may require amendment, including due to further Highway Authority requirements and security advice. This would be dealt with under the arrangements provided for within the legal agreement. Overall, the provision of bollards are welcomed and would help contribute to improving public safety in the area because the existing line of bollards does not protect the entrance at the Sainsbury Wing which the proposed bollards would.

The Highway Planning Manager does not raise any concerns with the loss of the lawn area, alterations to the gates or other alterations to the buildings. Overall, the Highway Planning Manager notes that the principle of the works are acceptable, and will be subject to a detailed design process and will be funded by the National Gallery. This process will ensure that the proposals adhere to City Plan Policies 24, 25 and 43 and will ensure that the proposals provide the public realm improvements. As such, this aspect of the proposal results in a public benefit.

#### *Jubilee Walk Walkways Agreement*

Jubilee Walk is outside the extent of the highway. While the National Gallery opens Jubilee Walk to the public during the day, it is closed at night as it has gates at either end. This means it has not been open and passable continuously and therefore has not become part of the highway.

The National Gallery created Jubilee Walk when it built the Sainsbury Wing. It was a public benefit to that development as it allowed a new pedestrian link northwards making pedestrian connections between Trafalgar Square and Leicester Square more attractive and enjoyable for pedestrians. The original intention of the City Council in 1987, when it considered the planning application for the Sainsbury Wing, was to ensure Jubilee Walk is governed by a Walkways Agreement. The National Gallery and the City Council drafted an agreement, but it was never completed. The agreement would have ensured the National Gallery adhered to various provisions, including opening times for Jubilee Walk of 7:30am – 8pm during October to March and 7:30am – 10pm. The City Council issued planning permission prior to the agreement being completed (which is highly unusual) at the request of the National Gallery. They explained that complexities had

arisen at the time relating to the passing of ownership of the National Gallery from the government to the Trustees. It appears the understanding at the time was that the City Council and National Gallery would subsequently complete agreement, but this did not happen.

Despite the lack of a Walkways Agreement governing the area, the National Gallery has maintained access into Jubilee Walk for the public and has appropriately maintained the space to this day. Jubilee Walk remains an important pedestrian link within the area from Trafalgar Square towards Leicester Square. Nonetheless, as part of this application the legal agreement is to ensure that the Walkways Agreement is now entered into so the access to the area by the public remains in perpetuity.

### **Accessibility**

City Plan Policy 25 requires development to be permeable, easy and safe to walk through, enhance existing routes and to create step free legible access and entrance points. Policy 38 requires development to be accessible and inclusive for all, including people of all ages and those with mobility and sensory impairment or other health concerns and disabilities. Under the Equalities Act, the City Council must have due regard to the need to 'advance equality of opportunity' and in particular due regard must be given to: the need to remove or minimise disadvantages suffered by those with a protected characteristic; taking steps to meet the needs of those with a protected characteristic; and encourage persons with a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The National Gallery explains one of the motivations to make the Sainsbury Wing entrance the sole main entrance in 2018 was to ensure the main entrance to the site was accessible to all. Some objectors have contended the Wilkins Building portico entrance should be altered to improve it and it should be reinstated as the main entrance. The National Gallery have explored various options to improve the site, and it is clear to officers that it is not feasible to alter the entrance to the Wilkins Building in a practical manner that would allow it to be an accessible entrance. The main entrance to a building should be accessible to all, and it should be an independent access without additional undue effort, separation or special treatment – therefore, those who require level access to enter the National Gallery should not be consigned to an alternative entrance. As such, the use of the Sainsbury Wing entrance as the sole main entrance was a positive change from an accessibility point of view. In addition, any alternative proposals to the Wilkins Building's portico entrance that sought to alter and reopen it whilst not providing an entrance equally accessible to all would likely be considered (from an accessibility point of view) to be a retrograde step from the status quo (where there is a single accessible main entrance at the Sainsbury Wing).

The proposals seek to improve the Sainsbury Wing as the sole main entrance to increase its accessibility and legibility. This includes the removal of barriers, such as revolving doors and screens, which would make independent access easier. The internal alterations to the building have been designed to improve accessibility also, this includes adequate widths, door automation etc. The opening up of the lobby internally in the Sainsbury Wing would also have the affect of improving legibility in the space. As the lifts to the gallery spaces above are toward the rear of the building, beyond the principal

stair, and because the existing large internal columns within the lobby obscure sight lines, it is not always clear to visitors where the lifts are located. Reducing the columns and opening up the lobby area would improve this.

The basement link underneath Jubilee Walk would also involve the upgrading of an existing lift within the Wilkins Building to extend it to the new basement level. This would provide a new accessible route from the Wilkins Buildings, and in particular the Research Centre and Members House, to the Sainsbury Wing.

The proposals also create a new accessible entrance into the Wilkins Building from Trafalgar Square. While this entrance would not be open to the public at large because it leads into the Research Centre and Members House, this entrance along with internal alterations to remove steps inside the Wilkins Building will mean that all members, staff and visitors allowed into this area will be able to use the same entrance and same routes within this part of the building. Externally, the proposals include ensuring the public realm is accessible to all by using appropriate materials and ensuring appropriate gradients.

Overall, the proposals have been conceived to improve accessibility, legibility and circulation throughout the buildings and they achieve this. This accords with the aims of the City Plan which seeks to ensure the public realm and buildings are inclusive to all, and it constitutes a public benefit of the proposal.

### **Servicing and Waste & Recycling Storage**

The existing site benefits from an off-street servicing area accessed from Orange Street and this area will continue to be used for servicing. The waste and recycling storage will remain unchanged by the proposals. Therefore, notwithstanding the Waste Project Officer's concern about the details, there would not be any harm to the highway or waste/ recycling storage and collection as a result of these proposals.

### **Cycling & Cycle Storage**

The proposals do not increase floorspace within the building and therefore there is no requirement to provide increased cycle parking provision.

### **Car Parking**

The proposals do not involve the provision of car parking, nor does the London Plan or City Plan require any be provided.

## **9.7 Economy including Employment & Skills**

Whilst the development is of insufficient scale to require an employment and skills plan, it will contribute positively to the local economy during the construction phase through the generation of increased opportunities for local employment, procurement and spending.

The West End has been particularly hard hit by the pandemic and there is a need for both businesses and cultural institutions within the Central Activities Area to be



supported at this time to enable their post pandemic recovery. The proposed development will contribute to the recovery of the West End in accordance with City Plan Policies 1, 15 and 17 by improving an important art gallery and providing new public realm which will help contribute to attracting to people to the site and area. This is a public benefit.

## 9.8 Other Considerations

### Basement

City Plan Policy 45 relates to basements and it seeks to make sure that basement developments are appropriately designed and constructed.

In relation to the extent and depth of the basement, Policy 45 states basement developments of a single storey will be supported and in this case the basement is a single storey.

The application has been supported by a structural statement which the City Council's Building Control Team confirm demonstrate the basement can be constructed while safeguarding the structural stability of the buildings. Given the site is large, the relative size of the basement is modest, the site is highly accessible and that there are few residential properties nearby, the impact the construction of the basement would have on the surroundings to the site would be comparatively low. Conditions are recommended to ensure that the National Gallery adhere to the Code of Construction Practice and suitable hours of building works. This will ensure the impacts that would arise are mitigated appropriately.

In relation to the impact of the basement on the heritage assets it would like, see section 9.4 of this report.

### Security

One of the motivations for the proposals is to improve security in the building, including the visitor experience of it. City Plan Policy 38 requires development to be people-centred, including reducing the opportunity for crime.

One of motivations of the National Gallery's decision to make the Sainsbury Wing the principal entrance to the site was the lack of space within the Wilkins Building's portico entrance to adequately carry out security checks for visitors – a necessity not envisaged when the buildings were constructed. While the Sainsbury Wing is a better location for this to occur, the requirement still has been introduced into a building not designed for it meaning security checks are being carried outside within the loggia. This is a sub-optimal situation, particularly from a visitor experience perspective. The construction of a security vestibule would allow the security checks to occur inside the building and would provide a better space for it.

The applicant also proposes various other security measures, including Hostile Vehicle Measure (discussed in section 9.6 of this report), enhanced of glazing and frames to openings, electronic access control, intruder detection, and an intercommunications system and the installation of CCTV. These measures would either deter, detect or delay

crime and are therefore welcomed.

## **Consultation**

In relation to other comments not addressed in other sections of this report, this section will address some of these. A commenter has asked where Denise Scott Brown's (one of the original architects for the Sainsbury Wing) comments on the proposals are published – however, the City Council has not published any comments from her. Another commenter queried whether there would be new plaques for the statues outside of the National Gallery explaining the subjects' involvement with slavery. This is not proposed under this application and the statues are not altered and are outside of the scope of works considered under these applications.

### **9.9 Environmental Impact Assessment**

The proposed development is not of sufficient scale or impact to require an Environmental Impact Assessment.

### **9.10 Planning Obligations & Pre-Commencement Conditions**

The draft 'Heads' of agreement are proposed to cover the following issues:

- i. Provision of highway works and works to the public realm necessary to facilitate the development;
- ii. Provision of and adherence to a Walkways Agreement relating to Jubilee Walk; and
- iii. The cost of monitoring the agreement.

The estimated CIL payment is:  
£0

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 following pre-commencement conditions:

- Code of Construction Practice

The applicant has agreed to the imposition of the conditions.

## **10. Conclusion**

### **Heritage Harm**

The proposals result in harmful impacts to the special interest of heritage assets. This includes less than substantial harm to the grade I listed Wilkins Building and Sainsbury Wing, as well as on archaeological heritage assets. No harmful impact is found to the character and appearance of the Trafalgar Square Conservation Area or to the setting of the listed statues on the front lawns of the Wilkins Building, nor would the proposals harm the setting of the very numerous other adjacent heritage assets on and around Trafalgar Square.

Considering all aspects of the scheme, the impact in heritage terms would be a moderate degree of less than substantial harm as set out in section 9.4 of this report. Paragraph 202 of the NPPF states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

### **Public Benefits**

As set out throughout this report, officers agree with the National Gallery, and supporters of the scheme, that these proposals would result in significant and weighty public benefits. This is because the proposals would better allow the National Gallery to provide a welcoming environment for visitors, better allow it to carry out research, allow it to generate further income to support its core activities and allow it to better provide educational opportunities amongst other benefits.

The alterations allow for improved accessibility into the buildings, creating a single main entrance at the Sainsbury which is inclusive and welcoming. The lobby space would be enlarged through the removal of the shop, along with other features, allowing more public space at ground level to help with orientation, legibility and accessibility into the National Gallery's main gallery spaces. The alterations would bring more light and openness into the Sainsbury Wing lobby, would allow it to better handle security and circulation and officers agree this would create a more welcoming space.

The alterations also would allow the National Gallery to better provide research and educational opportunities on the site, through the alterations to improve the education centre and research centre and other facilities. As well as generate income through the provisions of a members area. A new public space would not only improve the welcoming at the National Gallery, but also be a place all can enjoy. The alterations would also improve the energy performance of the buildings, helping the Gallery to contribute toward a reduction in carbon emissions.

These outcomes would either directly or indirectly contribute to the National Gallery fulfilling its core purpose as a charitable institution whose primary objective is to generate public benefit. These public benefits are considered to be substantial.

### **Planning Balance**

The National Gallery itself is of great public importance and provides a significant public benefit to not only the public of Westminster, but also nationally and internationally. Many of these public benefits arise from the work and activities it undertakes on this site,

online and elsewhere to fulfil its core purpose/ aims. Expectedly therefore, works that allow the National Gallery site to better contribute to the organisations ability to fulfil its core purpose would result in corresponding public benefits (as set out above). In terms of built heritage however, the National Gallery is also the steward for two of the nation's most important buildings. In this case, achieving the public benefits results in less than substantial harm to the special architectural and historic interest of the listed buildings. Special regard must be given to the desirability of preserving listed buildings, but where a development leads to less than substantial harm, the NPPF states this harm should be weighed against the public benefits, including taking into account whether any conflict between the heritage asset's conservation and any aspect of the proposal has been avoided or minimised.

The National Gallery has set out a convincing justification as to why the proposed alterations are required and how these alterations would help them better deliver their core purpose. Historic England and officers recognise the alterations to the National Gallery buildings are required to achieve the improvements, and that they are no more than is necessary to secure the objectives of the National Gallery.

As such, whilst being mindful of polices of the development plan, given the substantial public benefits that would be delivered, the proposal is considered acceptable in terms of its impact on the designated heritage assets. Therefore, the recommendation to grant conditional permission and listed building consent is compliant with the requirements of the NPPF and the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990.

(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: JOSHUA HOWITT BY EMAIL AT [jhowitt@westminster.gov.uk](mailto:jhowitt@westminster.gov.uk)

11. KEY DRAWINGS



Images of altered Sainsbury Wing, Jubilee Walk, Public Realm and Wilkins Building



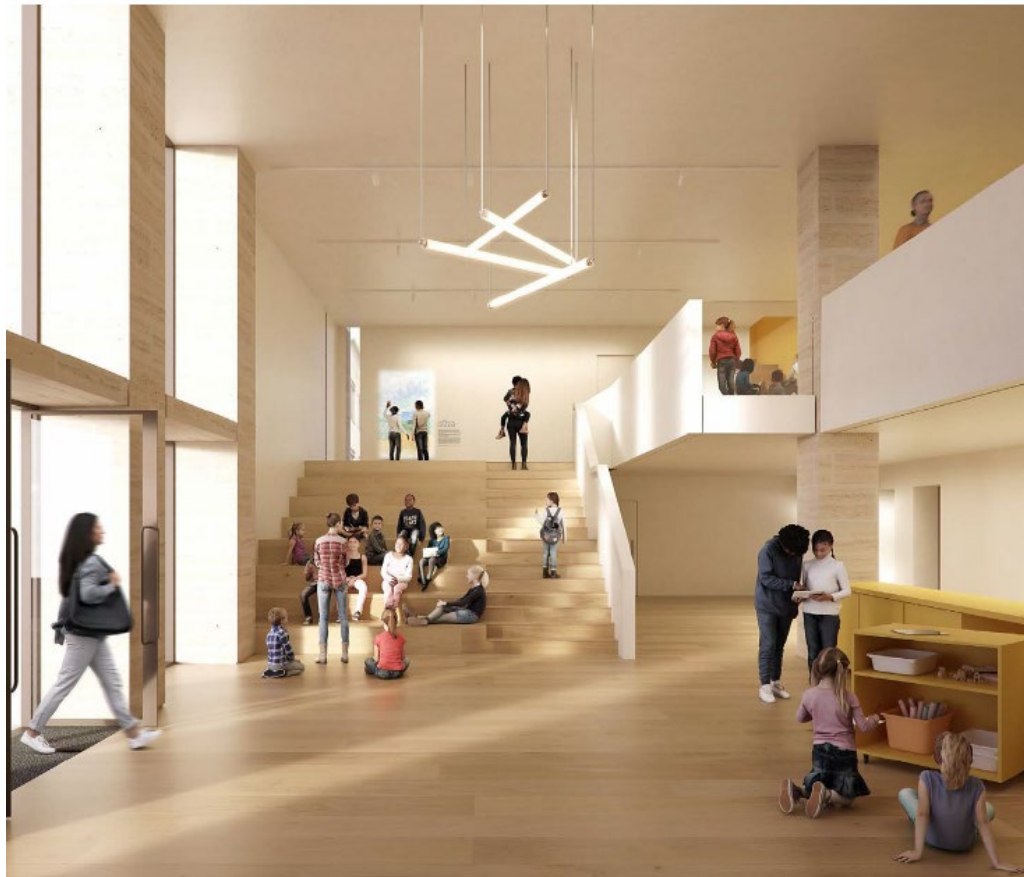


Images of altered lobby within the Sainsbury Wing



Image of altered Sainsbury Wing lobby from the stairs



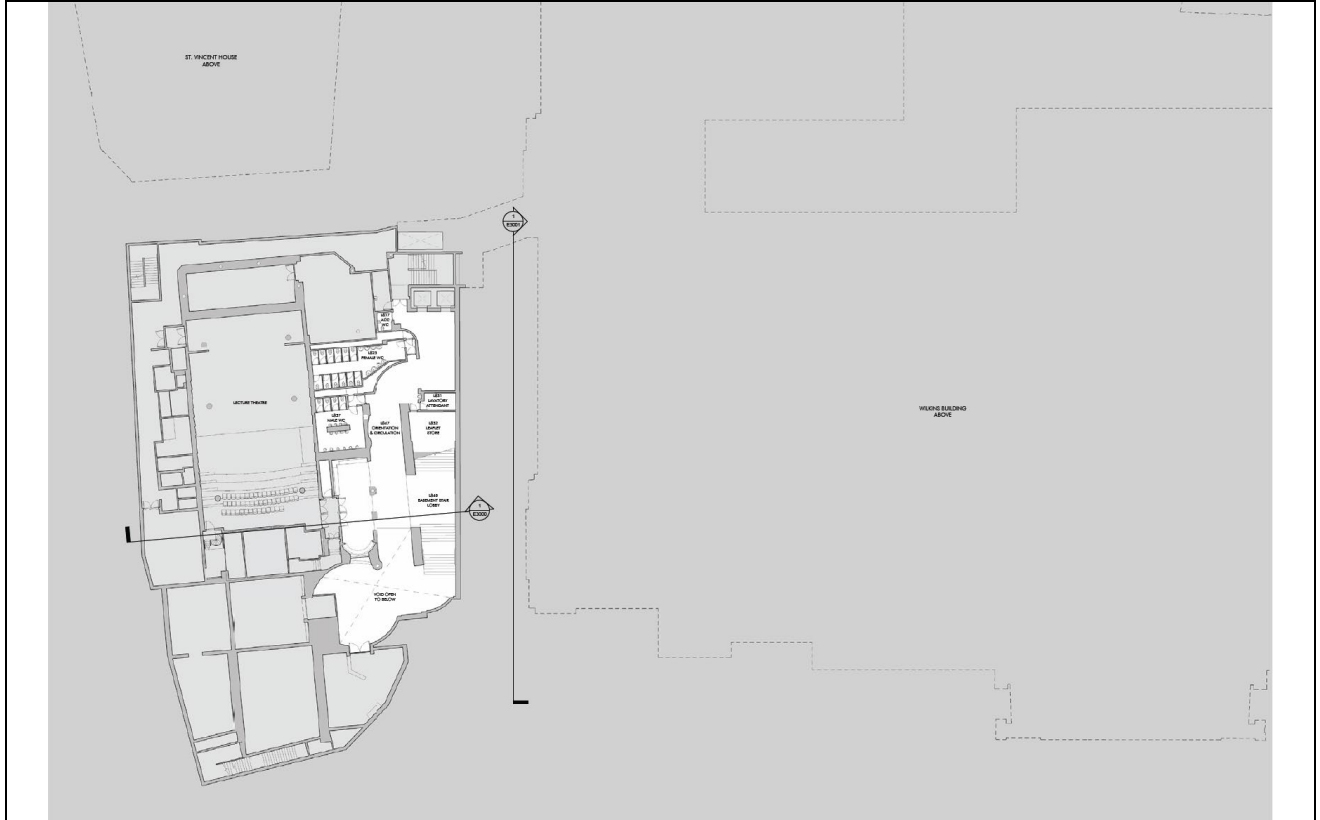


Images of altered Pigott Education Centre

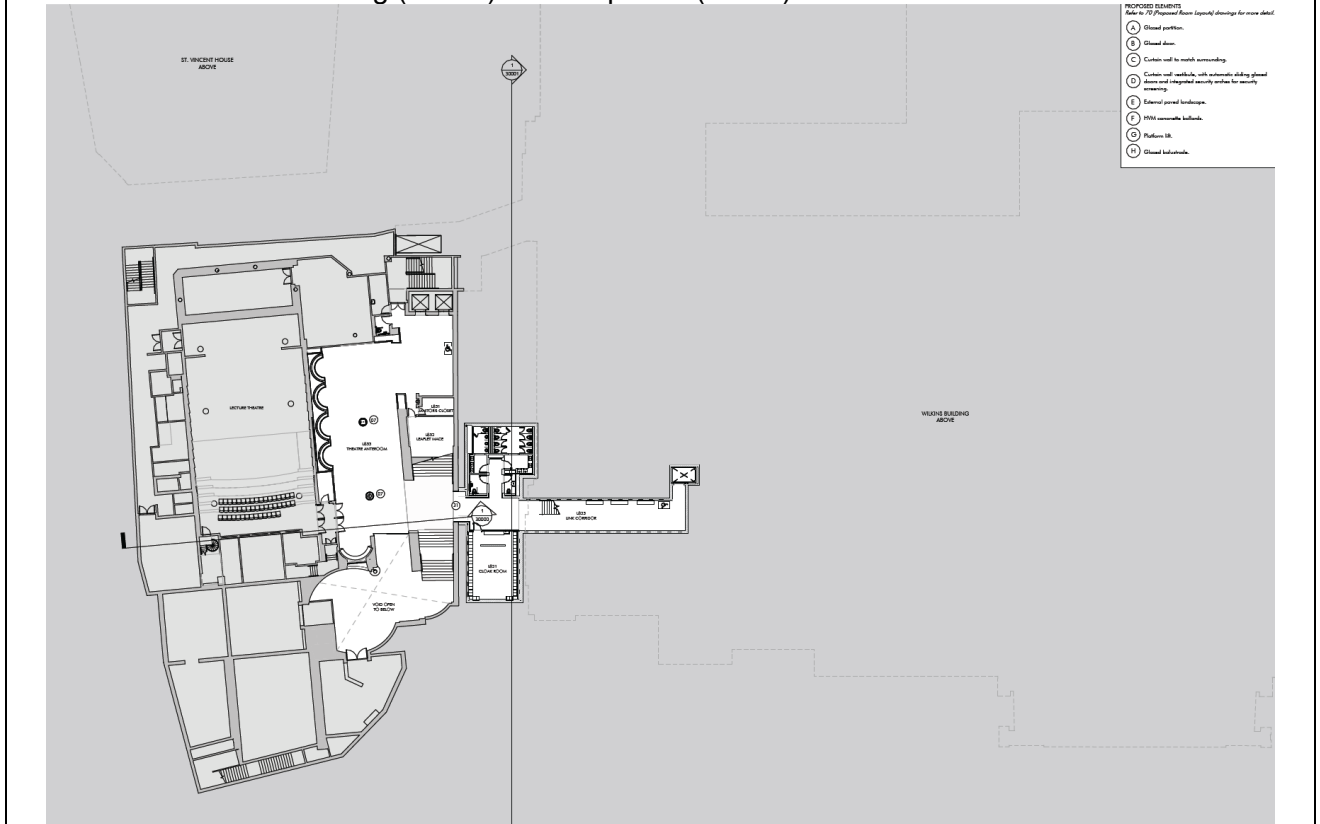




Images of proposed new stair from new basement link into the existing floors of the Wilkins Building

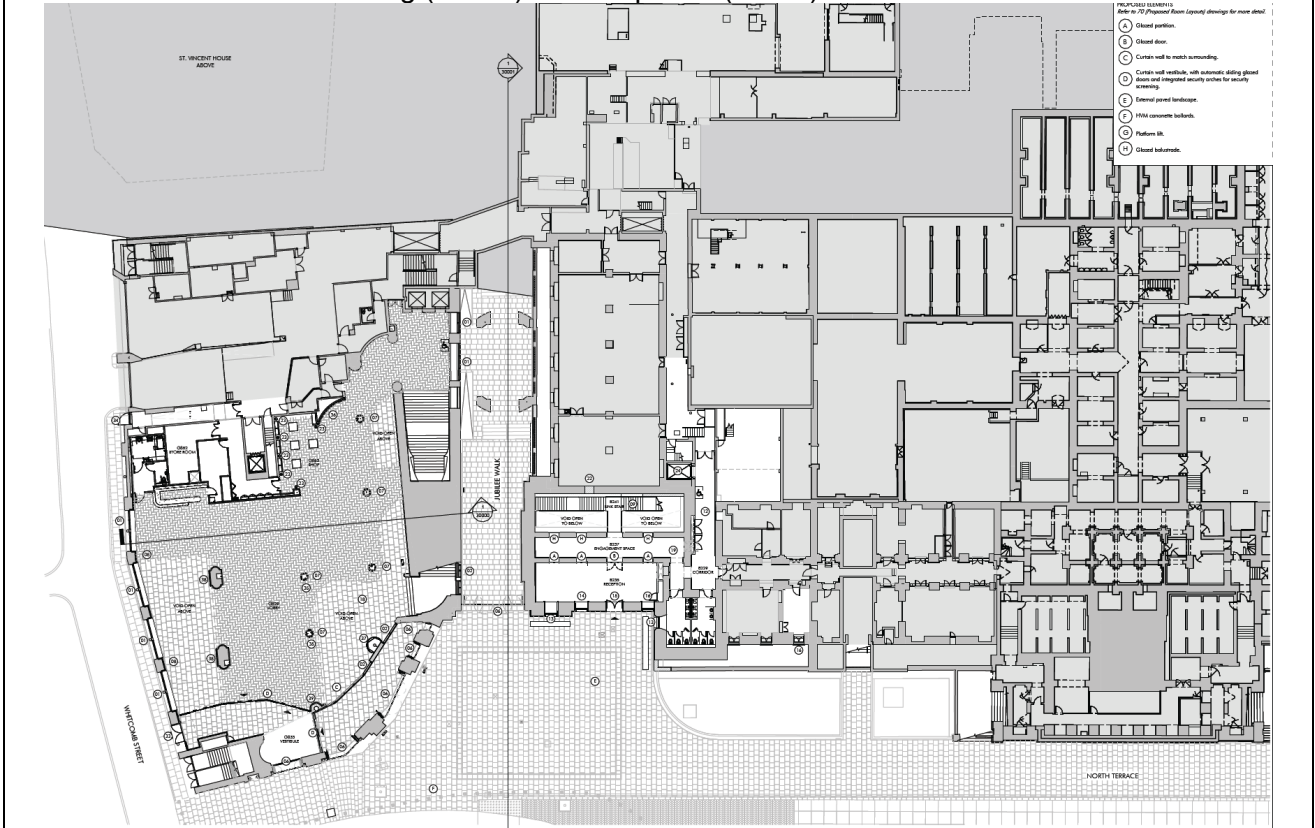


Existing (above) and Proposed (below) Basement Level 1





Existing (above) and Proposed (below) Ground Level

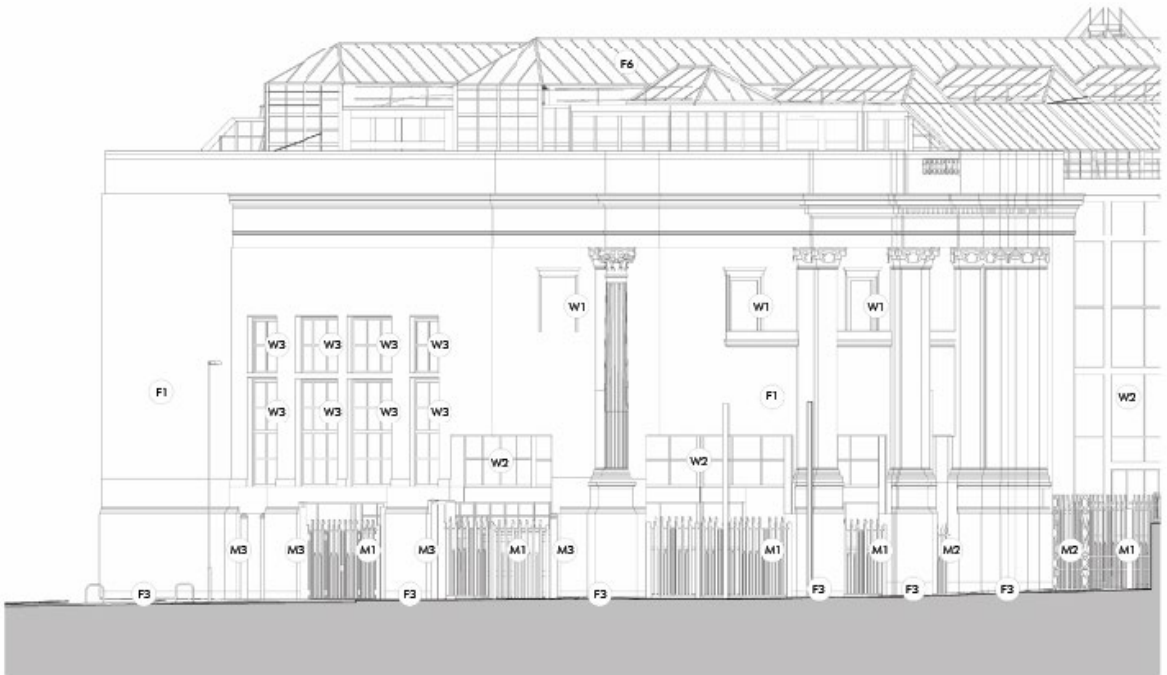




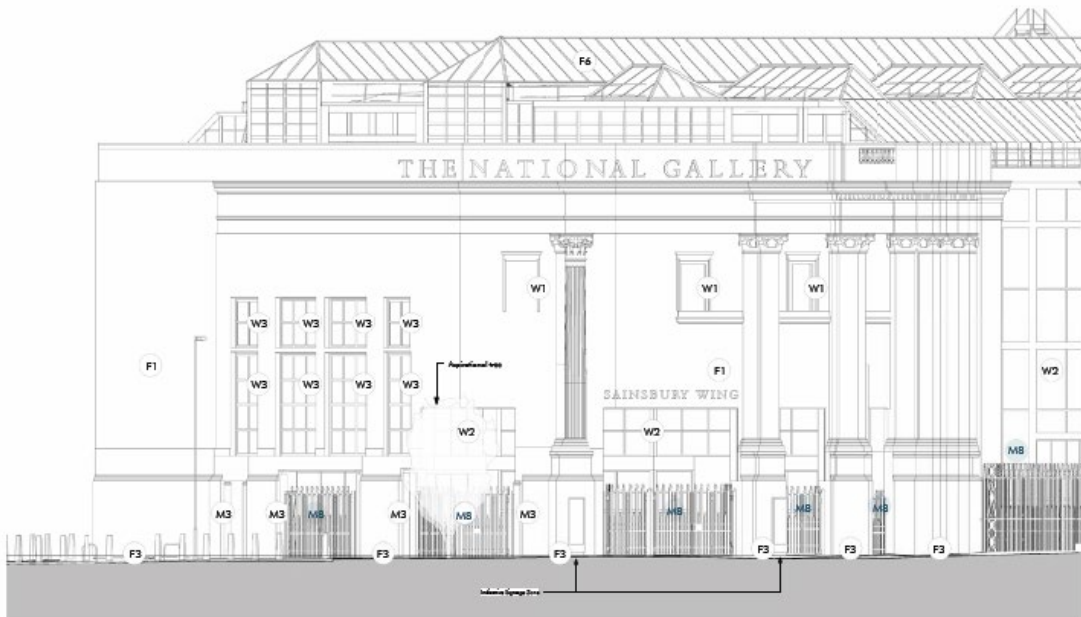
Existing (above) and Proposed (below) First Floor Plan

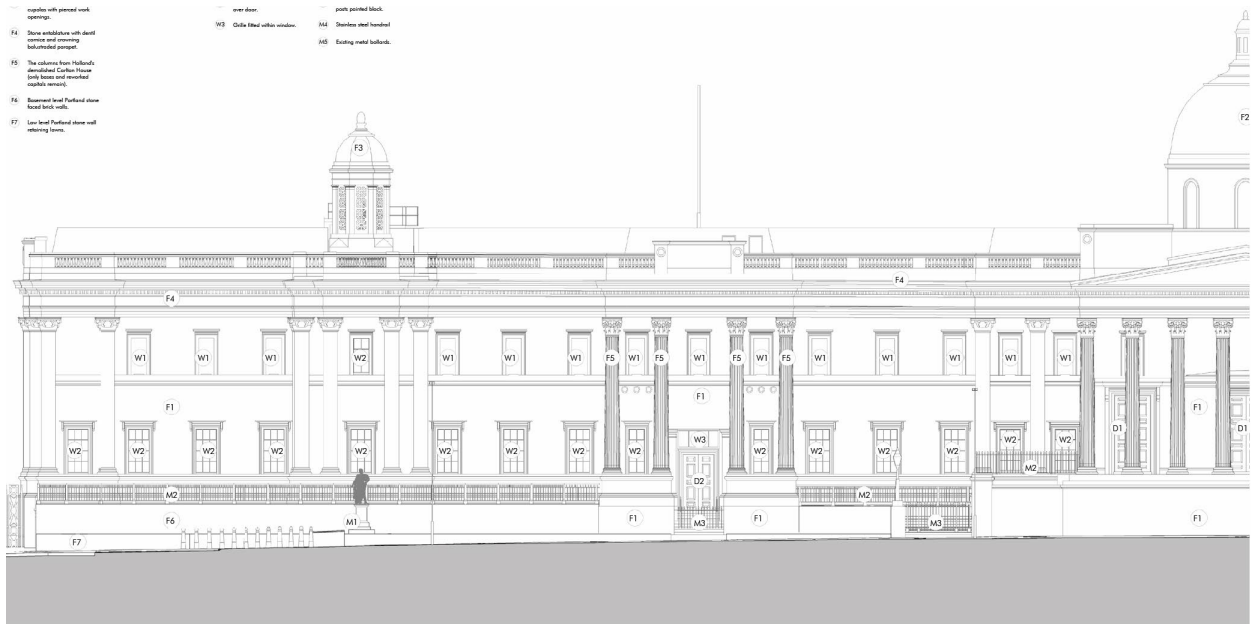




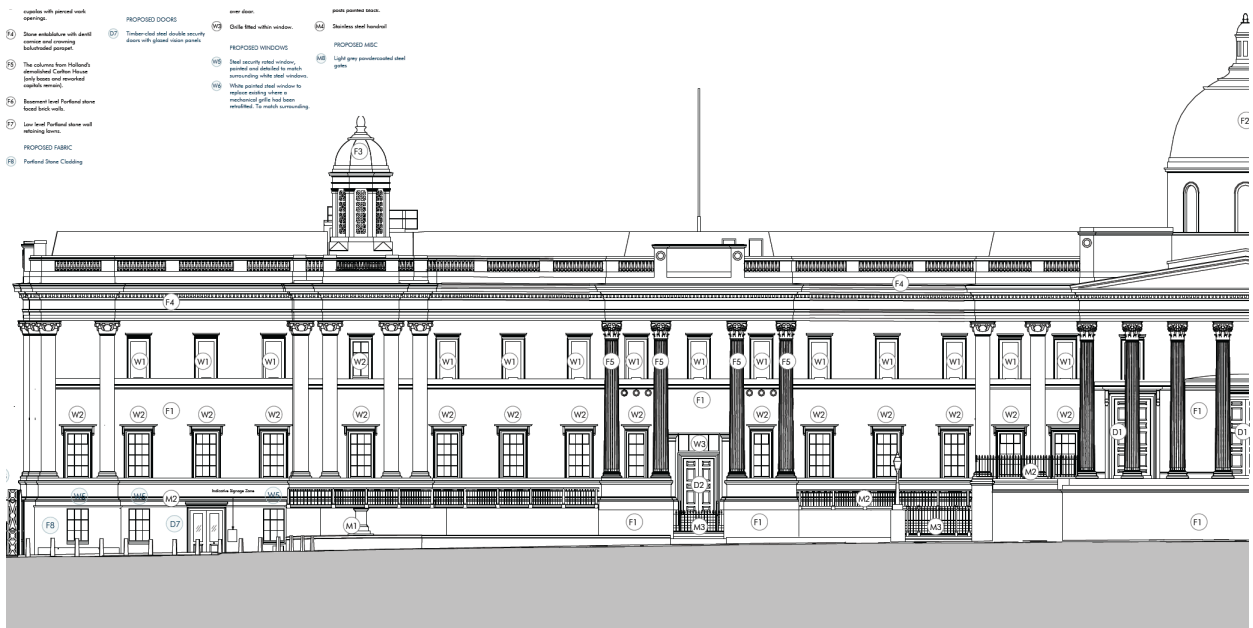


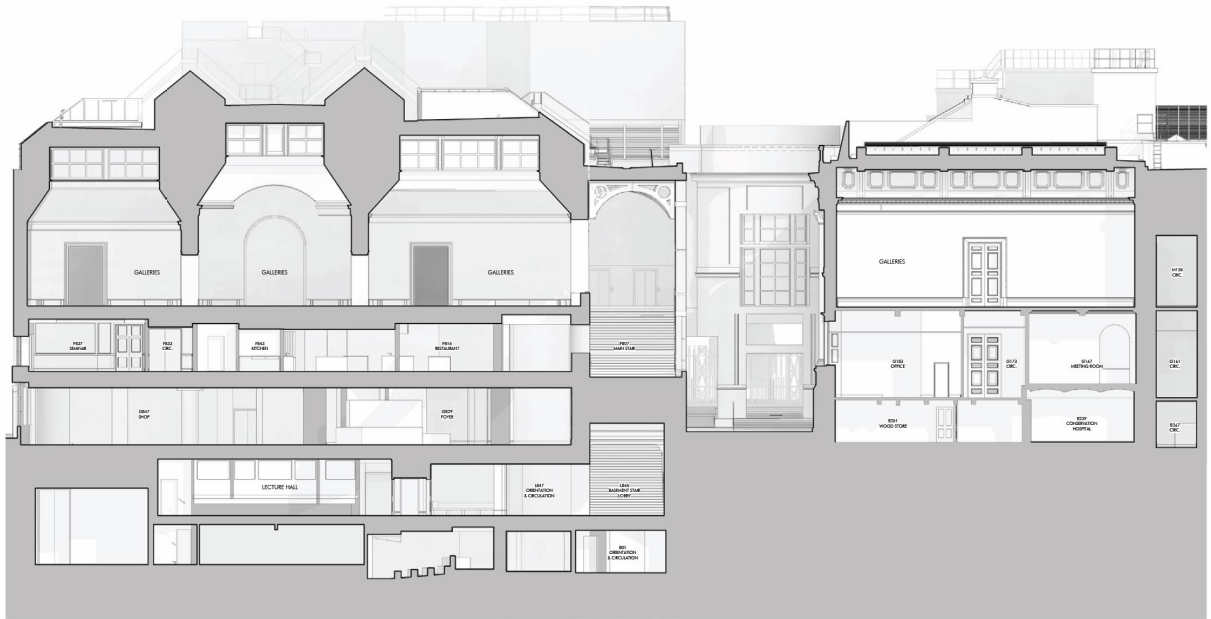
Existing (above) and Proposed (below) South Elevation of Sainsbury Wing



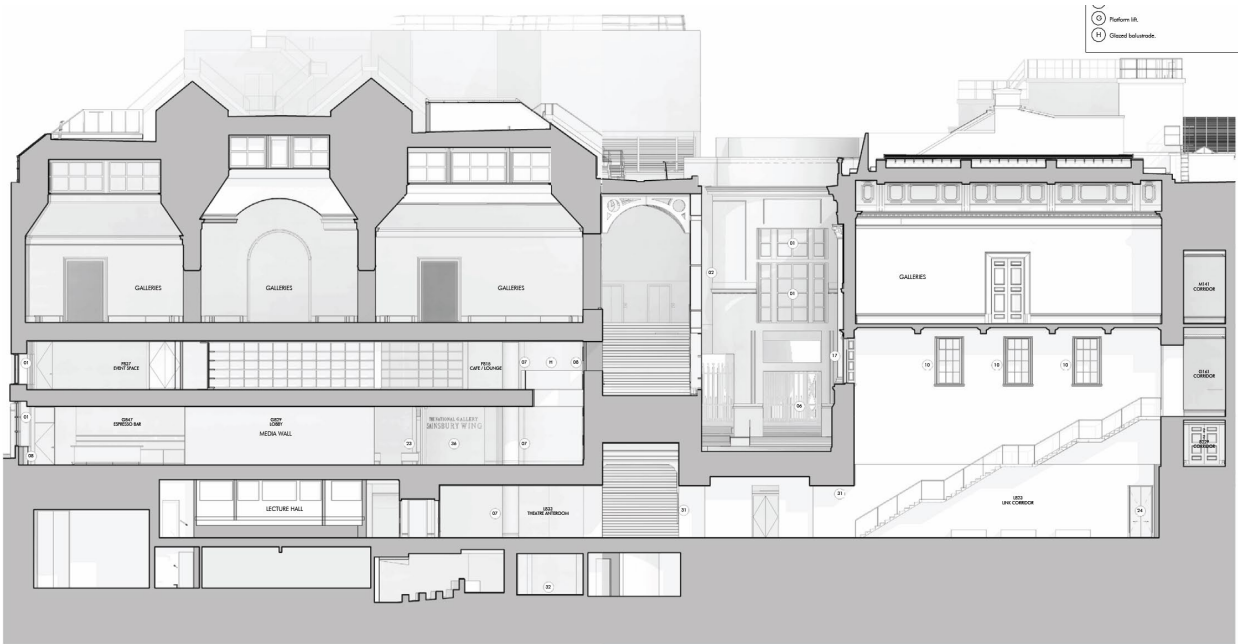


Existing (above) and Proposed (below) South Elevation of Wilkins Building





Existing (above) and Proposed (below) Section



**DRAFT DECISION LETTER – Planning Application**

**Address:** The National Gallery, Trafalgar Square, London, WC2N 5DN

**Proposal:** Remodelling of external gates, replacement glazing and adaption and enclosure of the loggia of the Sainsbury Wing. External alterations to the Wilkins Building, including alterations and part removal of railings, lawn and wall, with new entrance on Trafalgar Square to the Research Centre and Members Room. New basement link under Jubilee Walk, including excavation. Public realm works to the north of Trafalgar Square and Jubilee Walk, including new paving, benches, bollards and planting. New window and external alterations to Pigott Education Centre on Orange Street.

**Reference:** 22/04894/FULL

**Plan Nos:** Location Plan; Existing and Proposed Site Plans.

**Existing Drawings:**

NG200-PUR-WB-B1-DR-A-21000-PL-PL01; NG200-PUR-ZZ-SWB2-DG-A-E1000-PL-PL01; NG200-PUR-ZZ-SWB1-DG-A-E1001-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E1002-PL-PL01 NG200-PUR-ZZ-ZZ-DG-A-E1003-PL-PL01; NG200-PUR-ZZ-ZZM-DG-A-E1004-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2000-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2001-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2002-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2003-PL-PL01; NG200-PUR-WB-ZZ-DG-A-E2004-PL-PL01; NG200-PUR-WB-ZZ-DG-A-E2005-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E2006-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E3000-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E3001-PL-PL01; NG200-LWS-EC-0-DR-A-1000-PL-PL.01; NG200-LWS-EC-0-DR-A-1001-PL-PL.01; NG200-LWS-EC-0-DR-A-1002-P-PL.01; NG200-LWS-EC-S-DR-A-3000-PL-PL.01; NG200-LWS-EC-N-DR-A-4000-PL-PL.01; NG200-LWS-EC-EW-DR-A-4001-PL-PL.01; NG200-VLA-DR-L-P-3026-1000-PL-PL02; NG200-VLA-DR-L-P-3026-6000-PL-PL01; NG200-VLA-DR-L-P-3026-6010-PL-PL02; NG200-VLA-DR-L-P-3026-6020-PL-PL01; NG200-VLA-DR-L-P-3026-6030-PL-PL01.

**Demolition Drawings:**

NG200-PUR-ZZ-B2-DR-A-D1000-PL-PL02; NG200-PUR-ZZ-B1-DR-A-D1001-PL-PL02; NG200-PUR-ZZ-00-DR-A-D1002-PL-PL02; NG200-PUR-ZZ-01-DR-A-D1003-PL-PL02; NG200-PUR-ZZ-02-DR-A-D1004-PL-PL02; NG200-PUR-SW-ZZ-DR-A-D2000-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2003-PL-PL01; NG200-PUR-WB-ZZ-DR-A-D2004-PL-PL02; NG200-PUR-WB-ZZ-DR-A-D2005-PL-PL02; NG200-PUR-WB-ZZ-DR-A-D2006-PL-PL02 NG200-PUR-ZZ-ZZ-DR-A-D3000-PL-PL02; NG200-PUR-ZZ-ZZ-DR-A-D3001-PL-PL02; NG200-LWS-EC-0-DR-A-1100-PL-PL.01; NG200-LWS-EC-0-DR-A-1101-PL-PL.01; NG200-LWS-EC-0-DR-A-1102-PL-PL.01; NG200-LWS-EC-S-DR-A-3100-PL-PL.01; NG200-LWS-EC-S-DR-A-4100-PL-PL.01; NG200-VLA-DR-L-P-3026-1010-PL-PL02; NG200-VLA-DR-L-P-3026-6001-PL-PL01; NG200-VLA-DR-L-P-3026-6011-PL-PL02; NG200-VLA-DR-L-P-3026-6021-PL-PL01; NG200-VLA-DR-L-P-3026-6031-PL-PL01.



## Proposed Drawings:

NG200-PUR-ZZ-B2-DR-A-10000-PL-PL02; NG200-PUR-ZZ-B1-DR-A-10001-PL-PL02; NG200-PUR-ZZ-00-DR-A-10002-PL-PL02; NG200-PUR-ZZ-01-DR-A-10003-PL-PL02; NG200-PUR-ZZ-02-DR-A-10004-PL-PL02; NG200-PUR-ZZ-RF-DR-A-17011-PL-PL02; NG200-PUR-SW-ZZ-DR-A-20000-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20003-PL-PL01; NG200-PUR-WB-ZZ-DR-A-20004-PL-PL01; NG200-PUR-WB-ZZ-DR-A-20005-PL-PL02; NG200-PUR-WB-ZZ-DR-A-20006-PL-PL02; NG200-PUR-WB-B1-DR-A-21001-PL-PL01; NG200-PUR-ZZ-ZZ-DR-A-30000-PL-PL02; NG200-PUR-ZZ-ZZ-DR-A-30001-PL-PL02; NG200-LWS-EC-0-DR-A-1200-PL-PL.01; NG200-LWS-EC-0-DR-A-1201-PL-PL.01; NG200-LWS-EC-0-DR-A-1202-PL-PL.01; NG200-LWS-EC-0-DR-A-1300-PL-PL.01; NG200-LWS-EC-0-DR-A-1301-PL-PL.01; NG200-LWS-EC-0-DR-A-1302-PL-PL.01; NG200-LWS-EC-S-DR-A-3200-PL-PL.01; NG200-LWS-EC-N-DR-A-4200-PL-PL.01; NG200-LWS-EC-EW-DR-A-4201-PL-PL.01; NG200-VLA-DR-L-P-3026-1020-PL-PL02; NG200-VLA-DR-L-P-3026-3020-PL-PL02; NG200-VLA-DR---P-3026-4020-PL-PL02; NG200-VLA-DR-L-P-3026-6002-PL-PL02; NG200-VLA-DR-L-P-3026-6012-PL-PL02; NG200-VLA-DR-L-P-3026-6022-PL-PL02; NG200-VLA-DR-L-P-3026-6032-PL-PL02.

## Detailed Drawings:

NG200-PUR-SW-ZZ-DR-A-23041-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23042-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23043-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23044-PL-PL01; NG200-PUR-WB-LG-DR-A-23045-PL-PL01; NG200-PUR-WB-LG-DR-A-23046-PL-PL01; NG200-PUR-WB-LG-DR-A-23047-PL-PL01; NG200-PUR-WB-LG-DR-A-23048-PL-PL01; NG200-PUR-WB-LG-DR-A-23049-PL-PL01; NG200-PUR-WB-01-DR-A-23050-PL-PL01; NG200-PUR-WB-01-DR-A-23051-PL-PL01; NG200-PUR-WB-01-DR-A-23052-PL-PL01; NG200-PUR-WB-01-DR-A-23053-PL-PL01; NG200-PUR-WB-01-DR-A-23054-PL-PL01; NG200-PUR-WB-01-DR-A-23055-PL-PL01; NG200-PUR-WB-01-DR-A-23056-PL-PL01; NG200-PUR-WB-01-DR-A-23057-PL-PL01; NG200-PUR-WB-01-DR-A-23058-PL-PL01; NG200-PUR-WB-01-DR-A-23059-PL-PL01; NG200-PUR-WB-01-DR-A-23060-PL-PL01; NG200-PUR-WB-01-DR-A-23061-PL-PL01; NG200-PUR-WB-01-DR-A-23062-PL-PL01; NG200-PUR-WB-01-DR-A-23063-PL-PL01; NG200-PUR-WB-01-DR-A-23064-PL-PL01; NG200-PUR-WB-01-DR-A-23065-PL-PL01; NG200-PUR-WB-01-DR-A-23066-PL-PL01; NG200-PUR-WB-01-DR-A-23067-PL-PL01; NG200-PUR-WB-01-DR-A-23068-PL-PL01; NG200-PUR-WB-01-DR-A-23069-PL-PL01; NG200-PUR-WB-01-DR-A-23070-PL-PL01; NG200-PUR-WB-01-DR-A-23071-PL-PL01; NG200-PUR-WB-01-DR-A-23072-PL-PL01; NG200-PUR-WB-01-DR-A-23073-PL-PL01; NG200-PUR-WB-01-DR-A-23074-PL-PL01; NG200-PUR-WB-01-DR-A-23075-PL-PL01; NG200-PUR-WB-01-DR-A-23076-PL-PL01; NG200-PUR-WB-01-DR-A-23077-PL-PL01; NG200-PUR-WB-01-DR-A-23078-PL-PL01; NG200-PUR-WB-01-DR-A-23079-PL-PL01; NG200-PUR-WB-01-DR-A-23080-PL-PL01; NG200-PUR-WB-01-DR-A-23081-PL-PL01; NG200-PUR-WB-01-DR-A-23082-PL-PL01; NG200-PUR-WB-01-DR-A-23083-PL-PL01; NG200-PUR-WB-01-DR-A-23084-PL-PL01; NG200-PUR-WB-01-DR-A-23085-PL-PL01; NG200-PUR-WB-01-DR-A-23086-PL-PL01; NG200-PUR-WB-01-DR-A-23087-PL-PL01; NG200-PUR-WB-01-DR-A-23088-PL-PL01; NG200-PUR-WB-01-DR-A-23089-PL-PL01; NG200-PUR-WB-01-DR-A-23090-PL-PL01; NG200-PUR-WB-01-DR-A-23091-PL-PL01; NG200-PUR-WB-01-DR-A-23092-PL-PL01; NG200-PUR-WB-01-DR-A-23093-PL-PL01;

NG200-PUR-WB-01-DR-A-23094-PL-PL01; NG200-PUR-WB-01-DR-A-23095-PL-PL01; NG200-PUR-WB-01-DR-A-23096-PL-PL01; NG200-PUR-WB-01-DR-A-23097-PL-PL01; NG200-PUR-WB-01-DR-A-23098-PL-PL01; NG200-PUR-WB-01-DR-A-23099-PL-PL01; NG200-PUR-WB-01-DR-A-23100-PL-PL01; NG200-PUR-WB-01-DR-A-23101-PL-PL01; NG200-PUR-WB-01-DR-A-23102-PL-PL01; NG200-PUR-WB-01-DR-A-23103-PL-PL01; NG200-PUR-WB-01-DR-A-23106-PL-PL01; NG200-PUR-WB-01-DR-A-23108-PL-PL01; NG200-PUR-WB-01-DR-A-23109-PL-PL01; NG200-PUR-WB-01-DR-A-23110-PL-PL01; NG200-PUR-WB-01-DR-A-23111-PL-PL01; NG200-PUR-WB-01-DR-A-23112-PL-PL01; NG200-PUR-WB-01-DR-A-70001-PL-PL01; NG200-PUR-WB-01-DR-A-70002-PL-PL01; NG200-PUR-WB-01-DR-A-70003-PL-PL01; NG200-PUR-WB-01-DR-A-70004-PL-PL01; NG200-PUR-WB-01-DR-A-70005-PL-PL01; NG200-PUR-WB-01-DR-A-70006-PL-PL02; NG200-PUR-WB-01-DR-A-70007-PL-PL02; NG200-PUR-WB-01-DR-A-70008-PL-PL01; NG200-PUR-WB-01-DR-A-70009-PL-PL02; NG200-PUR-WB-01-DR-A-70010-PL-PL02; NG200-PUR-WB-01-DR-A-70011-PL-PL02; NG200-PUR-WB-01-DR-A-70012-PL-PL01; NG200-PUR-WB-01-DR-A-70013-PL-PL01; NG200-PUR-WB-01-DR-A-70014-PL-PL01; NG200-PUR-WB-01-DR-A-70015-PL-PL01; NG200-PUR-WB-01-DR-A-70016-PL-PL01; NG200-PUR-WB-01-DR-A-70017-PL-PL01; NG200-PUR-WB-01-DR-A-70018-PL-PL01; NG200-PUR-WB-01-DR-A-70019-PL-PL01; NG200-PUR-WB-01-DR-A-70020-PL-PL02; NG200-PUR-WB-01-DR-A-70021-PL-PL02; NG200-PUR-WB-01-DR-A-70022-PL-PL02; NG200-PUR-WB-01-DR-A-70023-PL-PL01; NG200-PUR-WB-01-DR-A-70024-PL-PL02; NG200-PUR-WB-01-DR-A-70025-PL-PL02; NG200-PUR-SW-01-DR-A-70026-PL-PL01; NG200-PUR-SW-01-DR-A-70029-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70030-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70031-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70032-PL-PL01; NG200-PUR-SW-B1-DR-A-70033-PL-PL02; NG200-PUR-SW-B1-DR-A-70034-PL-PL01; NG200-PUR-SW-B1-DR-A-70035-PL-PL02; NG200-PUR-SW-B1-DR-A-70036-PL-PL02; NG200-PUR-SW-00-DR-A-70037-PL-PL02; NG200-PUR-SW-00-DR-A-70038-PL-PL02; NG200-PUR-SW-00-DR-A-70039-PL-PL02; NG200-PUR-SW-00-DR-A-70040-PL-PL02; NG200-PUR-WB-B1-DR-A-41001-PL-PL02; NG200-PUR-SW-00-DR-A-41002-PL-PL02; NG200-PUR-SW-00-DR-A-41003-PL-PL02; NG200-PUR-ZZ-ZZ-SH-A-42000-PL-PL02; NG200-PUR-SW-ZZ-DR-A-42001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42003-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42004-PL-PL01; NG200-PUR-SW-02-DR-A-42005-PL-PL01; NG200-PUR-WB-ZZ-DR-A-42007-PL-PL01; NG200-PUR-WB-ZZ-DR-A-42008-PL-PL01; NG200-PUR-WB-00-DR-A-42010-PL-PL01; NG200-PUR-WB-01-DR-A-42011-PL-PL01; NG200-PUR-WB-B1-DR-A-42012-PL-PL02; NG200-PUR-WB-B1-DR-A-42013-PL-PL02; NG200-PUR-WB-B1-DR-A-42014-PL-PL02; NG200-PUR-WB-B1-DR-A-42015-PL-PL01; NG200-PUR-WB-01-DR-A-42016-PL-PL01; NG200-PUR-WB-01-DR-A-42017-PL-PL01; NG200-LWS-EC-0-DR-A-5000-PL-PL01; NG200-PUR-SW-ZZ-SH-A-43000-PL-PL02; NG200-PUR-SW-ZZ-DR-A-43001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-43002-PL-PL02; NG200-PUR-WB-B1-DR-A-32001-PL-PL02; NG200-PUR-EX-00-DR-A-32005-PL-PL02; NG200-PUR-SW-00-DR-A-32010-PL-PL01; NG200-PUR-SW-00-DR-A-44000-PL-PL01; NG200-PUR-SW-00-DR-A-44001-PL-PL02; NG200-PUR-SW-00-DR-A-44010-PL-PL01; NG200-PUR-SW-00-DR-A-44011-PL-PL01; NG200-PUR-SW-00-DR-A-44012-PL-PL01; NG200-VLA-DR-L---3026-7030-PL-PL01; NG200-VLA-DR-L---3026-7031-PL-PL02; NG200-VLA-DR-L---3026-7033-PL-PL02; NG200-VLA-DR-L---3026-7032-PL-PL01; NG200-VLA-DR-L---3026-7010-PL-PL02; NG200-VLA-DR-L---3026-7011-PL-PL02; NG200-VLA-DR-L---3026-7012-PL-PL02; NG200-

VLA-DR-L---3026-7013-PL-PL02; NG200-VLA-DR-L---3026-7014-PL-PL02; NG200-VLA-DR-L---3026-7020-PL-PL02; NG200-VLA-DR-L---3026-7022-PL-PL02; NG200-VLA-DR-L---3026-4020-PL-PL02.

**Case Officer:** Joshua Howitt

**Direct Tel. No.** 07866038007

**Recommended Condition(s) and Reason(s)**

- 1 The development hereby permitted shall be carried out in accordance with the drawings and other documents listed on this decision letter, and any drawings approved subsequently by the City Council as local planning authority pursuant to any conditions on this decision letter.

Reason:

For the avoidance of doubt and in the interests of proper planning.

- 2 All new work to the outside of the building must match existing original work in terms of the choice of materials, method of construction and finished appearance. This applies unless differences are shown on the drawings we have approved or are required by conditions to this permission. (C26AA)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 3 You must apply to us for approval of detailed drawings of the following parts of the development to the Sainsbury Wing:

- New window (elevation and section 1:10)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 4 You must apply to us, and in consultation with Historic England, for approval of details of

the finish and colour of the following parts of the development:

- The gates to the Sainsbury Wing and Jubilee Walk

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 5 You must apply to us for approval of materials for the following parts of the development:

- Replacement glazing to the eastern facade of the Sainsbury Wing. (Showing the sample in context)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 6 You must apply to us for approval of details of the following parts of the development:

- (i) Details drawings showing the new external lighting to the frieze of the Sainsbury Wing. This must show the lighting unit, where the lighting units will be positioned and how it will be fixed to the cornice;
- (ii) All other new external lighting;
- (iii) All new CCTV

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 7 You must apply to us for approval of details of the following parts of the development: , , - New windows to the Wilkins Building (elevations and sections scaled 1:10), , You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 8 You must apply to us for approval of materials of the following parts of the development:

- New Portland stone cladding to the exterior of the Wilkins building. To be provided on site.

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 9 You must apply to us for approval of detailed drawings of the following parts of the development affecting the Piggot Education Centre:

- New glazing including framing, scaled 1:20 (sections and elevations)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26FE)

- 10 You must apply to us for approval of detailed drawings and materials of the following parts of the development:

- The final pavement design and samples of the pavers of the new public space.

You must not start any work on these parts of the development until we have approved

what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the setting of the listed buildings, to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area and to protect the pedestrian environment/ public realm. This is as set out in Policies 24, 25, 38, 39, 40 43 and 44 of the City Plan 2019 - 2040 (April 2021).

- 11 Notwithstanding what is shown on the approved drawings, you must apply to us for approval of detailed drawings of the final hard and soft landscaping scheme. You must not use the new/altered entrances to the Wilkins Building and Sainsbury Wing until we have approved what you have sent us.

Reason:

To protect the setting of the listed buildings, to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area and to protect the pedestrian environment/ public realm. This is as set out in Policies 24, 25, 38, 39, 40 43 and 44 of the City Plan 2019 - 2040 (April 2021).

- 12 No groundworks shall take place until you have submitted to us a written scheme of investigation (WSI) and it has been approved by us in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives and:

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material. The part of the condition shall not be discharged until these have been fulfilled in accordance with the programme set out in the WSI.

Reason:

To protect the archaeological heritage of the City of Westminster as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021). (R32BD)

- 13 No groundworks shall take place until details of an appropriate programme of public engagement with and interpretation of the site's archaeological interest has been submitted to and approved by us. The approved programme must be implemented in accordance with a timetable set out in the programme.

Reason:

To secure public interpretation and presentation of the site's archaeological remains as set out Policy 39 of the City Plan 2019 - 2040 (April 2021). (R32AD)

- 14 Except for piling, excavation and demolition work, you must carry out any building work which can be heard at the boundary of the site only:
- o between 08.00 and 18.00 Monday to Friday;
  - o between 08.00 and 13.00 on Saturday; and
  - o not at all on Sundays, bank holidays and public holidays.

You must carry out piling, excavation and demolition work only:

- o between 08.00 and 18.00 Monday to Friday; and
- o not at all on Saturdays, Sundays, bank holidays and public holidays.

Noisy work must not take place outside these hours unless otherwise agreed through a Control of Pollution Act 1974 section 61 prior consent in special circumstances (for example, to meet police traffic restrictions, in an emergency or in the interests of public safety). (C11AB)

Reason:

To protect the environment of neighbouring occupiers. This is as set out in Policies 7 and 33 of the City Plan 2019 - 2040 (April 2021). (R11AD)

- 15 **Pre Commencement Condition.** Prior to the commencement of any:

- (a) demolition, and/or
- (b) earthworks/piling and/or
- (c) construction

on site you must apply to us for our written approval of evidence to demonstrate that any implementation of the scheme hereby approved, by the applicant or any other party, will be bound by the council's Code of Construction Practice. Such evidence must take the form of the relevant completed Appendix A checklist from the Code of Construction Practice, signed by the applicant and approved by the Council's Environmental Sciences Team, which constitutes an agreement to comply with the Code of Construction Practice and requirements contained therein. Commencement of the relevant stage of demolition, earthworks/piling or construction cannot take place until the City Council as local planning authority has issued its written approval through submission of details prior to each stage of commencement. (C11CD)

Reason:

To protect the environment of neighbouring occupiers. This is as set out in Policies 7 and 33 of the City Plan 2019 - 2040 (April 2021). (R11AD)

- 16 You must apply to us, in consultation with London Underground, for approval of details of the following parts of the development:

- Any works adjacent to London Underground assets including any works on Cockspur Street and Trafalgar Square

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details.

**Reason:**

To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

- 17 No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement

**Reason:**

To protect sewerage infrastructure, as the proposed works are in close proximity to underground sewerage utility infrastructure and piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure, in accordance with Policy 35 of the City Plan 2019 - 2040 (April 2021).

- 18 You must retain and maintain the box hedging and lawns to the front of the Wilkins Building, as shown on the approved 'proposed' drawings.

**Reason:**

To protect the appearance of the development, to make sure that it contributes to the character and appearance of the conservation area and setting of the listed building and other heritage assets, and to improve its contribution to biodiversity and the local environment. This is as set out in Policies 34, 38 and 39 of the City Plan 2019 - 2040 (April 2021).

**Informative(s):**

- 1 In dealing with this application the City Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies in the City Plan 2019 - 2040 (April 2021), neighbourhood plan (where relevant), supplementary planning documents, the London Plan (March 2021), planning briefs and other informal written guidance, as well as offering a full pre application advice service, in order to ensure that applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant at the validation stage.
- 2 In relation to condition 13, the written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with



Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 3 You are encouraged to install a rapid (minimum 50kW) electric vehicle charging point within the loading bay for freight vehicles, this would help increase electric vehicle charging options.

You are reminded that this planning permission is not an agreement of the Council as Highway Authority. Separate approvals and legal agreements will be required. These will need to cover aspects including installation, maintenance, commuted sums, removal (at Council discretion).

In relation to the Hostile Vehicle Mitigation Measures, because there is no site survey of the underground conditions each location, there can no guarantee that each pole/bollard can be installed as shown. Any revised location, no matter how small the deviation, will need further full assessment.

You must ensure you have all relevant approvals for undertaking work on the highway before commencing work.

- 4 The development will result in changes to road access points. Any new threshold levels in the building must be suitable for the levels of neighbouring roads. If you do not plan to make changes to the road and pavement you need to send us a drawing to show the threshold and existing road levels at each access point.

If you need to change the level of the road, you must apply to our Highways section at least eight weeks before you start work. You will need to provide survey drawings showing the existing and new levels of the road between the carriageway and the development. You will have to pay all administration, design, supervision and other costs. We will carry out any work which affects the road. For more advice, please email [AskHighways@westminster.gov.uk](mailto:AskHighways@westminster.gov.uk).

- 5 You need to speak to our Highways section about any work which will affect public roads. This includes new pavement crossovers, removal of redundant crossovers, changes in threshold levels, changes to on-street parking arrangements, and work which will affect pavement vaults. You will have to pay all administration, design, supervision and other costs of the work. We will carry out any work which affects the highway. When considering the desired timing of highway works in relation to your own development programme please bear in mind that, under the Traffic Management Act 2004, all works on the highway require a permit, and (depending on the length of the highway works) up to three months advance notice may need to be given. For more advice, please email [AskHighways@westminster.gov.uk](mailto:AskHighways@westminster.gov.uk). However, please note that if any part of your proposals would require the removal or relocation of an on-street parking bay, this is unlikely to be approved by the City Council (as highway authority).

- 6 THAMES WATER COMMENTS:

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent

reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via , [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

- 7 You must get separate permission under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 for the following advertisements: - signage external to the building.. (I04AA)

Item No.
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Please note: the full text for informatives can be found in the Council's Conditions, Reasons & Policies handbook, copies of which can be found in the Committee Room whilst the meeting is in progress, and on the Council's website.

**DRAFT DECISION LETTER – Listed Building Application**

- Address:** The National Gallery, Trafalgar Square, London, WC2N 5DN
- Proposal:** External and internal alterations, including remodelling of external gates, replacement glazing and adaption of the loggia and internal lobby to the Sainsbury Wing. Alterations to the southwest part of the Wilkins Building, including existing railings, lawn and wall; with new entrance onto Trafalgar Square to the Research Centre and Members Room, with related internal alterations. New basement link under Jubilee Walk; and alterations to the Pigott Education Centre, including new external window on the facade.
- Reference:** 22/04895/LBC
- Plan Nos:** Location Plan; Existing and Proposed Site Plans.

## Existing Drawings:

NG200-PUR-WB B1-DR-A-21000-PL-PL01; NG200-PUR-ZZ-SWB2-DG-A-E1000-PL-PL01; NG200-PUR-ZZ-SWB1-DG-A-E1001-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E1002-PL-PL01 NG200-PUR-ZZ-ZZ-DG-A-E1003-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E1004-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2000-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2001-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2002-PL-PL01; NG200-PUR-SW-ZZ-DG-A-E2003-PL-PL01; NG200-PUR-WB-ZZ-DG-A-E2004-PL-PL01; NG200-PUR-WB-ZZ-DG-A-E2005-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E2006-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E3000-PL-PL01; NG200-PUR-ZZ-ZZ-DG-A-E3001-PL-PL01; NG200-LWS-EC-0-DR-A-1000-PL-PL.01; NG200-LWS-EC-0-DR-A-1001-PL-PL.01; NG200-LWS-EC-0-DR-A-1002-P-PL.01; NG200-LWS-EC-S-DR-A-3000-PL-PL.01; NG200-LWS-EC-N-DR-A-4000-PL-PL.01; NG200-LWS-EC-EW-DR-A-4001-PL-PL.01; NG200-VLA-DR-L-P-3026-1000-PL-PL02; NG200-VLA-DR-L-P-3026-6000-PL-PL01; NG200-VLA-DR-L-P-3026-6010-PL-PL02; NG200-VLA-DR-L-P-3026-6020-PL-PL01; NG200-VLA-DR-L-P-3026-6030-PL-PL01.

## Demolition Drawings:

NG200-PUR-ZZ-B2-DR-A-D1000-PL-PL02; NG200-PUR-ZZ-B1-DR-A-D1001-PL-PL02; NG200-PUR-ZZ-00-DR-A-D1002-PL-PL02; NG200-PUR-ZZ-01-DR-A-D1003-PL-PL02; NG200-PUR-ZZ-02-DR-A-D1004-PL-PL02; NG200-PUR-SW-ZZ-DR-A-D2000-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-D2003-PL-PL01; NG200-PUR-WB-ZZ-DR-A-D2004-PL-PL02; NG200-PUR-WB-ZZ-DR-A-D2005-PL-PL02; NG200-PUR-WB-ZZ-DR-A-D2006-PL-PL02 NG200-PUR-ZZ-ZZ-DR-A-D3000-PL-PL02; NG200-PUR-ZZ-ZZ-DR-A-D3001-PL-PL02; NG200-LWS-EC-0-DR-A-1100-PL-PL.01; NG200-LWS-EC-0-DR-A-1101-PL-PL.01; NG200-LWS-EC-0-DR-A-1102-PL-PL.01; NG200-LWS-EC-S-DR-A-3100-PL-PL.01; NG200-LWS-EC-S-DR-A-4100-PL-PL.01; NG200-VLA-DR-L-P-3026-1010-PL-PL02; NG200-VLA-DR-L-P-3026-6001-PL-PL01; NG200-VLA-DR-L-P-3026-6011-PL-PL02; NG200-VLA-DR-L-P-3026-6021-PL-PL01; NG200-VLA-DR-L-P-3026-6031-PL-PL01.

## Proposed Drawings:

NG200-PUR-ZZ-B2-DR-A-10000-PL-PL02; NG200-PUR-ZZ-B1-DR-A-10001-PL-PL02; NG200-PUR-ZZ-00-DR-A-10002-PL-PL02; NG200-PUR-ZZ-01-DR-A-10003-PL-PL02; NG200-PUR-ZZ-02-DR-A-10004-PL-PL02; NG200-PUR-ZZ-RF-DR-A-17011-PL-PL02; NG200-PUR-SW-ZZ-DR-A-20000-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-20003-PL-PL01; NG200-PUR-WB-ZZ-DR-A-20004-PL-PL01; NG200-PUR-WB-ZZ-DR-A-20005-PL-PL02; NG200-PUR-WB-ZZ-DR-A-20006-PL-PL02; NG200-PUR-WB-B1-DR-A-21001-PL-PL01; NG200-PUR-ZZ-ZZ-DR-A-30000-PL-PL02; NG200-PUR-ZZ-ZZ-DR-A-30001-PL-PL02; NG200-LWS-EC-0-DR-A-1200-PL-PL.01; NG200-LWS-EC-0-DR-A-1201-PL-PL.01; NG200-LWS-EC-0-DR-A-1202-PL-PL.01; NG200-LWS-EC-0-DR-A-1300-PL-PL.01; NG200-LWS-EC-0-DR-A-1301-PL-PL.01; NG200-LWS-EC-0-DR-A-1302-PL-PL.01; NG200-LWS-EC-S-DR-A-3200-PL-PL.01; NG200-LWS-EC-N-DR-A-4200-PL-PL.01; NG200-LWS-EC-EW-DR-A-4201-PL-PL.01; NG200-VLA-DR-L-P-3026-1020-PL-PL02; NG200-VLA-DR-L-P-3026-3020-PL-PL02; NG200-VLA-DR---P-3026-4020-PL-PL02; NG200-VLA-DR-L-P-3026-6002-PL-PL02; NG200-VLA-DR-L-P-3026-6012-PL-PL02; NG200-VLA-DR-L-P-3026-6022-PL-PL02; NG200-VLA-DR-L-P-3026-6032-PL-PL02.

Detailed Drawings:

NG200-PUR-SW-ZZ-DR-A-23041-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23042-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23043-PL-PL01; NG200-PUR-SW-ZZ-DR-A-23044-PL-PL01; NG200-PUR-WB-LG-DR-A-23045-PL-PL01; NG200-PUR-WB-LG-DR-A-23046-PL-PL01; NG200-PUR-WB-LG-DR-A-23047-PL-PL01; NG200-PUR-WB-LG-DR-A-23048-PL-PL01; NG200-PUR-WB-LG-DR-A-23049-PL-PL01; NG200-PUR-WB-01-DR-A-23050-PL-PL01; NG200-PUR-WB-01-DR-A-23051-PL-PL01; NG200-PUR-WB-01-DR-A-23052-PL-PL01; NG200-PUR-WB-01-DR-A-23053-PL-PL01; NG200-PUR-WB-01-DR-A-23054-PL-PL01; NG200-PUR-WB-01-DR-A-23055-PL-PL01; NG200-PUR-WB-01-DR-A-23056-PL-PL01; NG200-PUR-WB-01-DR-A-23057-PL-PL01; NG200-PUR-WB-01-DR-A-23058-PL-PL01; NG200-PUR-WB-01-DR-A-23059-PL-PL01; NG200-PUR-WB-01-DR-A-23060-PL-PL01; NG200-PUR-WB-01-DR-A-23061-PL-PL01; NG200-PUR-WB-01-DR-A-23062-PL-PL01; NG200-PUR-WB-01-DR-A-23063-PL-PL01; NG200-PUR-WB-01-DR-A-23064-PL-PL01; NG200-PUR-WB-01-DR-A-23065-PL-PL01; NG200-PUR-WB-01-DR-A-23066-PL-PL01; NG200-PUR-WB-01-DR-A-23067-PL-PL01; NG200-PUR-WB-01-DR-A-23068-PL-PL01; NG200-PUR-WB-01-DR-A-23069-PL-PL01; NG200-PUR-WB-01-DR-A-23070-PL-PL01; NG200-PUR-WB-01-DR-A-23071-PL-PL01; NG200-PUR-WB-01-DR-A-23072-PL-PL01; NG200-PUR-WB-01-DR-A-23073-PL-PL01; NG200-PUR-WB-01-DR-A-23074-PL-PL01; NG200-PUR-WB-01-DR-A-23075-PL-PL01; NG200-PUR-WB-01-DR-A-23076-PL-PL01; NG200-PUR-WB-01-DR-A-23077-PL-PL01; NG200-PUR-WB-01-DR-A-23078-PL-PL01; NG200-PUR-WB-01-DR-A-23079-PL-PL01; NG200-PUR-WB-01-DR-A-23080-PL-PL01; NG200-PUR-WB-01-DR-A-23081-PL-PL01; NG200-PUR-WB-01-DR-A-23082-PL-PL01; NG200-PUR-WB-01-DR-A-23083-PL-PL01; NG200-PUR-WB-01-DR-A-23084-PL-PL01; NG200-PUR-WB-01-DR-A-23085-PL-PL01; NG200-PUR-WB-01-DR-A-23086-PL-PL01; NG200-PUR-WB-01-DR-A-23087-PL-PL01; NG200-PUR-WB-01-DR-A-23088-PL-PL01; NG200-PUR-WB-01-DR-A-23089-PL-PL01; NG200-PUR-WB-01-DR-A-23090-PL-PL01; NG200-PUR-WB-01-DR-A-23091-PL-PL01; NG200-PUR-WB-01-DR-A-23092-PL-PL01; NG200-PUR-WB-01-DR-A-23093-PL-PL01; NG200-PUR-WB-01-DR-A-23094-PL-PL01; NG200-PUR-WB-01-DR-A-23095-PL-

PL01; NG200-PUR-WB-01-DR-A-23096-PL-PL01; NG200-PUR-WB-01-DR-A-23097-PL-PL01; NG200-PUR-WB-01-DR-A-23098-PL-PL01; NG200-PUR-WB-01-DR-A-23099-PL-PL01; NG200-PUR-WB-01-DR-A-23100-PL-PL01; NG200-PUR-WB-01-DR-A-23101-PL-PL01; NG200-PUR-WB-01-DR-A-23102-PL-PL01; NG200-PUR-WB-01-DR-A-23103-PL-PL01; NG200-PUR-WB-01-DR-A-23106-PL-PL01; NG200-PUR-WB-01-DR-A-23108-PL-PL01; NG200-PUR-WB-01-DR-A-23109-PL-PL01; NG200-PUR-WB-01-DR-A-23110-PL-PL01; NG200-PUR-WB-01-DR-A-23111-PL-PL01; NG200-PUR-WB-01-DR-A-23112-PL-PL01; NG200-PUR-WB-01-DR-A-70001-PL-PL01; NG200-PUR-WB-01-DR-A-70002-PL-PL01; NG200-PUR-WB-01-DR-A-70003-PL-PL01; NG200-PUR-WB-01-DR-A-70004-PL-PL01; NG200-PUR-WB-01-DR-A-70005-PL-PL01; NG200-PUR-WB-01-DR-A-70006-PL-PL02; NG200-PUR-WB-01-DR-A-70007-PL-PL02; NG200-PUR-WB-01-DR-A-70008-PL-PL01; NG200-PUR-WB-01-DR-A-70009-PL-PL02; NG200-PUR-WB-01-DR-A-70010-PL-PL02; NG200-PUR-WB-01-DR-A-70011-PL-PL02; NG200-PUR-WB-01-DR-A-70012-PL-PL01; NG200-PUR-WB-01-DR-A-70013-PL-PL01; NG200-PUR-WB-01-DR-A-70014-PL-PL01; NG200-PUR-WB-01-DR-A-70015-PL-PL01; NG200-PUR-WB-01-DR-A-70016-PL-PL01; NG200-PUR-WB-01-DR-A-70017-PL-PL01; NG200-PUR-WB-01-DR-A-70018-PL-PL01; NG200-PUR-WB-01-DR-A-70019-PL-PL01; NG200-PUR-WB-01-DR-A-70020-PL-PL02; NG200-PUR-WB-01-DR-A-70021-PL-PL02; NG200-PUR-WB-01-DR-A-70022-PL-PL02; NG200-PUR-WB-01-DR-A-70023-PL-PL01; NG200-PUR-WB-01-DR-A-70024-PL-PL02; NG200-PUR-WB-01-DR-A-70025-PL-PL02; NG200-PUR-SW-01-DR-A-70026-PL-PL01; NG200-PUR-SW-01-DR-A-70029-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70030-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70031-PL-PL01; NG200-PUR-SW-ZZ-DR-A-70032-PL-PL01; NG200-PUR-SW-B1-DR-A-70033-PL-PL02; NG200-PUR-SW-B1-DR-A-70034-PL-PL01; NG200-PUR-SW-B1-DR-A-70035-PL-PL02; NG200-PUR-SW-B1-DR-A-70036-PL-PL02; NG200-PUR-SW-00-DR-A-70037-PL-PL02; NG200-PUR-SW-00-DR-A-70038-PL-PL02; NG200-PUR-SW-00-DR-A-70039-PL-PL02; NG200-PUR-SW-00-DR-A-70040-PL-PL02; NG200-PUR-WB-B1-DR-A-41001-PL-PL02; NG200-PUR-SW-00-DR-A-41002-PL-PL02; NG200-PUR-SW-00-DR-A-41003-PL-PL02; NG200-PUR-ZZ-ZZ-SH-A-42000-PL-PL02; NG200-PUR-SW-ZZ-DR-A-42001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42002-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42003-PL-PL01; NG200-PUR-SW-ZZ-DR-A-42004-PL-PL01; NG200-PUR-SW-02-DR-A-42005-PL-PL01; NG200-PUR-WB-ZZ-DR-A-42007-PL-PL01; NG200-PUR-WB-ZZ-DR-A-42008-PL-PL01; NG200-PUR-WB-00-DR-A-42010-PL-PL01; NG200-PUR-WB-01-DR-A-42011-PL-PL01; NG200-PUR-WB-B1-DR-A-42012-PL-PL02; NG200-PUR-WB-B1-DR-A-42013-PL-PL02; NG200-PUR-WB-B1-DR-A-42014-PL-PL02; NG200-PUR-WB-B1-DR-A-42015-PL-PL01; NG200-PUR-WB-01-DR-A-42016-PL-PL01; NG200-PUR-WB-01-DR-A-42017-PL-PL01; NG200-LWS-EC-0-DR-A-5000-PL-PL01; NG200-PUR-SW-ZZ-SH-A-43000-PL-PL02; NG200-PUR-SW-ZZ-DR-A-43001-PL-PL01; NG200-PUR-SW-ZZ-DR-A-43002-PL-PL02; NG200-PUR-WB-B1-DR-A-32001-PL-PL02; NG200-PUR-EX-00-DR-A-32005-PL-PL02; NG200-PUR-SW-00-DR-A-32010-PL-PL01; NG200-PUR-SW-00-DR-A-44000-PL-PL01; NG200-PUR-SW-00-DR-A-44001-PL-PL02; NG200-PUR-SW-00-DR-A-44010-PL-PL01; NG200-PUR-SW-00-DR-A-44011-PL-PL01; NG200-PUR-SW-00-DR-A-44012-PL-PL01; NG200-VLA-DR-L---3026-7030-PL-PL01; NG200-VLA-DR-L---3026-7031-PL-PL02; NG200-VLA-DR-L---3026-7033-PL-PL02; NG200-VLA-DR-L---3026-7032-PL-PL01; NG200-VLA-DR-L---3026-7010-PL-PL02; NG200-VLA-DR-L---3026-7011-PL-PL02; NG200-VLA-DR-L---3026-7012-PL-PL02; NG200-VLA-DR-L---3026-7013-PL-PL02; NG200-VLA-DR-L---3026-7014-PL-PL02; NG200-

VLA-DR-L---3026-7020-PL-PL02; NG200-VLA-DR-L---3026-7022-PL-PL02; NG200-VLA-DR-L---3026-4020-PL-PL02.

**Case Officer:** Joshua Howitt

**Direct Tel. No.** 07866038007

**Recommended Condition(s) and Reason(s)**

- 1 The works hereby permitted shall be carried out in accordance with the drawings and other documents listed on this decision letter, and any drawings approved subsequently by the City Council as local planning authority pursuant to any conditions on this decision letter.

**Reason:**

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 2 All new work and improvements inside and outside the building must match existing original adjacent work in terms of the choice of materials, method of construction and finished appearance. This applies unless differences are shown on the approved drawings or are required in conditions to this permission. (C27AA)

**Reason:**

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 3 You must apply to us for approval of detailed drawings of the following parts of the development:

- (a) New internal doors within the Sainsbury Wing facing into the foyer (elevations and section 1:10)
- (b) New interior details within the Sainsbury Wing (1:10)
- (c) New window to the Sainsbury Wing (elevation and section 1:10)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

**Reason:**

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040

(April 2021). (R27AC)

- 4 You must apply to us, and in consultation with Historic England, for approval for the finish and colour of the following parts of the development:

- The gates to the Sainsbury Wing and Jubilee Walk

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 5 You must apply to us for approval of materials of the following parts of the development:

- Replacement glazing to the eastern facade of the Sainsbury Wing. (Showing the sample in context)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 6 You must apply to us for approval of detailed drawings (at scale 1:10 unless otherwise agreed in writing) materials of the following parts of the development within the interior of the Sainsbury Wing:

- (i) Columns
- (ii) Walls
- (iii) Floors
- (iv) Edge of the first-floor slab
- (v) Ceilings
- (vi) Balustrade to the first floor and its fixings
- (vii) Builder's work and other servicing openings

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)



**Reason:**

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 7 You must apply to us for approval of details of the following parts of the development:

- (i) Details drawings showing the new external lighting to the frieze of the Sainsbury Wing. This must show the lighting unit, where the lighting units will be positioned and how it will be fixed to the cornice;
- (ii) All other new external lighting;
- (iii) All new CCTV

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

**Reason:**

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 8 You must apply to us for approval of details of the following parts of the development within the interior of the Wilkins Building:

- (i) Cornices, skiting, architraves and doors, both those which are intended to be traditional replicas and contemporary additions;
- (ii) General interior finishes
- (iii) builder's work and other servicing openings

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

**Reason:**

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 9 You must apply to us for approval of details of the following parts of the development:

- New staircase within the Wilkins Building

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this listed building. This is as set out in Policy 39 of the City Plan 2019 - 2040 (April 2021) and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings. (R27BE)

- 10 You must apply to us for approval of details of the following parts of the development:

- New windows to the Wilkins Building (elevations and sections scaled 1:10)

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 11 You must apply to us for approval of materials of the following parts of the development:

- New Portland stone cladding to the exterior of the Wilkins building. To be provided on site.

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this building and to make sure the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

- 12 You must apply to us for approval of detailed drawings of the following parts of the development within the Piggot Education Centre:

- (i) New glazing including framing, scaled 1:20 (sections and elevations)
- (ii) internal balustrade in lobby
- (iii) Gallery 18 entrance

You must not start any work on these parts of the development until we have approved what you have sent us. You must then carry out the work according to these details (C26DB)

Reason:

To protect the special architectural or historic interest of this building and to make sure

the development contributes to the character and appearance of the Trafalgar Square Conservation Area. This is as set out in Policies 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R27AC)

**Informative(s):**

- 1 SUMMARY OF REASONS FOR GRANTING CONDITIONAL LISTED BUILDING CONSENT - In reaching the decision to grant listed building consent with conditions, the City Council has had regard to the relevant policies in the National Planning Policy Framework, the London Plan (March 2021), the City Plan (April 2021), as well as relevant supplementary planning guidance, representations received and all other material considerations.

The City Council has had special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses and has decided that the proposed works would not harm this special architectural or historic interest; or where any harm has been identified it has been considered acceptable in accordance with the NPPF.

In reaching this decision the following were of particular relevance:, Policies 38, 39 and 40 of the City Plan 2019 - 2040 adopted in April 2021 and paragraph 2.4 of our Supplementary Planning Guidance: Repairs and Alterations to Listed Buildings.

- 2 You will need to contact us again if you want to carry out work on the listed building which is not referred to in your plans. This includes:
- \* any extra work which is necessary after further assessments of the building's condition;
  - \* stripping out or structural investigations; and
  - \* any work needed to meet the building regulations or other forms of statutory control.

Please quote any 'TP' and 'RN' reference numbers shown on this consent when you send us further documents., , It is a criminal offence to carry out work on a listed building without our consent. Please remind your client, consultants, contractors and subcontractors of the terms and conditions of this consent. (I59AA)

- 3 In relation to condition 10, the window details should show glazing details and profiles to match the original windows, including integral glazing bars.

Please note: the full text for informatives can be found in the Council's Conditions, Reasons & Policies handbook, copies of which can be found in the Committee Room whilst the meeting is in progress, and on the Council's website.