

CITY OF WESTMINSTER			
PLANNING APPLICATIONS SUB COMMITTEE	Date 19 March 2024	Classification For General Release	
Report of Director of Town Planning & Building Control		Ward(s) involved St James's	
Subject of Report	Wellington Barracks, Birdcage Walk, London, SW1E 6HQ		
Proposal	Redevelopment of band practice facilities including demolition of existing rehearsal halls and erection of new extension to provide larger rehearsal halls, including reconfiguration at basement level to provide new band practice, changing and storage facilities for the bands of the Foot Guards.		
Agent	Arcadis		
On behalf of	Secretary of State for Defence		
Registered Number	23/05458/FULL	Date amended/ completed	16 August 2023
Date Application Received	7 August 2023		
Historic Building Grade			
Conservation Area	Birdcage Walk		
Neighbourhood Plan	N/A		

1. RECOMMENDATION

Grant conditional permission.

2. SUMMARY & KEY CONSIDERATIONS

The application site is within the Wellington Barracks, which lies within the Central Activities Zone (CAZ) and Birdcage Walk Conservation Area, and comprises a nineteenth century stucco fronted range (grade II listed) which front the parade ground fronting Birdcage walk, grade ISTAR listed Guards Chapel and a complex of twentieth century interlocking concrete buildings (1979-85 George, Tew and Dunn Architects) occupying the south of the site.

The proposal seeks to redevelop the rehearsal rooms, which are contained within a linear block which lies at the eastern end of the site, within the setting of the grade II and ISTAR buildings. The

rehearsal rooms are sandwiched between and 1979-85 accommodation block and the Ministry of Justice, which itself lies outside of the conservation area.

The Army has recognised that parts of its estate are in poor condition and is committed to addressing substandard facilities as a priority. Substandard buildings can impact on the way in which the Army and Defence Infrastructure Organisation, (DIO), undertake certain functions and can have a damaging effect on their reputation.

The band facilities at Wellington Barracks are used by the bands of the Foot Guards (i.e., the Grenadier Guards, the Coldstream Guards, the Scots Guards, the Irish Guards and the Welsh Guards) at Wellington Barracks. However, they do not meet current Health and Safety standards and the applicant states they are under-sized for the types of bands based there.

The redevelopment of the rehearsal halls including demolition of existing rehearsal halls and erection of a new extension to provide larger rehearsal halls, including reconfiguration at basement level to provide new band practice, changing and storage facilities for the bands of the Foot Guards.

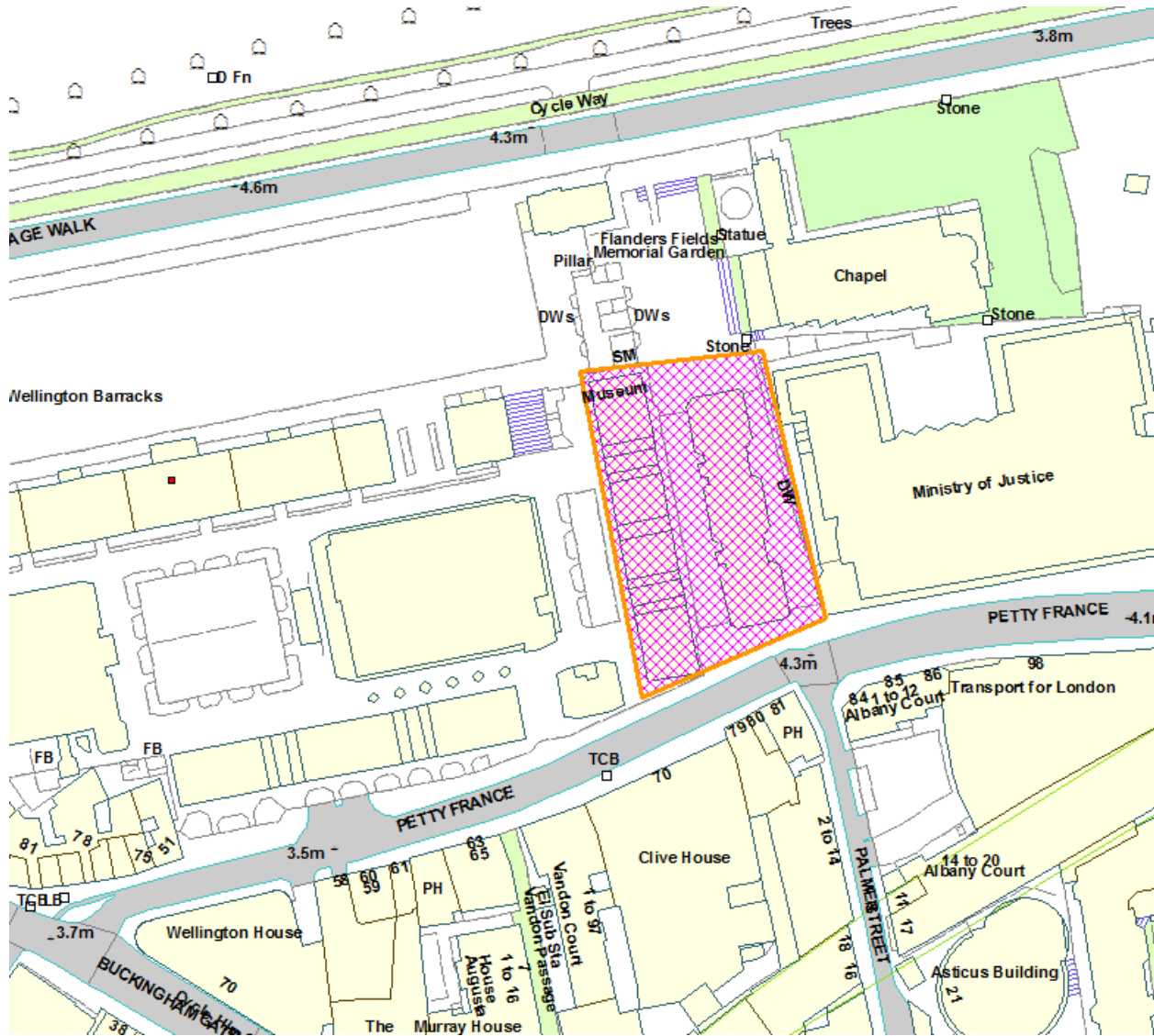
The key considerations in this case are:

- The impact of the proposed works on the appearance of the Barracks, the setting of adjacent grade II and IISTAR buildings and the character and appearance of the Belgravia Conservation Area; and
- The impact on the amenity of neighbouring residential properties.

The Thorney Island Society, object to the design of the new rehearsal hall, and concerns have been raised from a local resident in relation to noise and disturbance, planting, and on-street cycle parking.

The proposals are considered acceptable in heritage, townscape, design, land use, amenity, environmental, basement development and highway terms and the application is recommended for approval subject to the conditions as set out in the draft decision letter.

3. LOCATION PLAN



This production includes mapping data licensed from Ordnance Survey with the permission of the controller of Her Majesty's Stationary Office (C) Crown Copyright and /or database rights 2013.
 All rights reserved License Number LA 100019597

4. PHOTOGRAPHS



Wellington Barracks Rehearsal Hall, Petty France street frontage



Wellington Barracks Rehearsal Hall, North elevation



View from within Wellington Barracks towards the Rehearsal Hall, Barracks Accommodation, and adjacent Ministry of Justice

5. CONSULTATIONS

5.1 Application Consultations

THE THRONEY ISLAND SOCIETY:

Understand the need for this scheme, however, object to its appearance because the new aesthetic will be less sympathetic to its context than the existing building. The vertical gable ends to the southern and northern rehearsal halls seem strident and unnecessary - unless the objective is to enhance the acoustics, in which case why does the central rehearsal room not have a similar shaped roof. Would like to see a pedestrian route open to the public, through the site from Petty France to the Guards Chapel, if security conditions change.

HIGHWAYS PLANNING MANAGER:

Undesirable but could be considered acceptable, subject to agreeing a stopping up order in relation to the parts of the building line being brought forward on the Petty France frontage.

ENVIRONMENTAL SCIENCES:

No objection, subject to conditions relating to mechanical plant, and hours of use (both plant and rehearsal halls).

SUSTAINABILITY OFFICER:

There is some demolition associated with the proposal, and even though the overall embodied carbon is not considered high in comparison to other major schemes, it is recommended that the applicant is mindful of whole life carbon targets through all stages of design and construction. Conditions are recommended in respect of Whole Life Carbon and Circular Economy.

ARBORICULTURAL MANAGER:

No objection, subject to conditions relating to tree protection and landscaping.

ENVIRONMENT AGENCY:

No objection

DESIGNING OUT CRIME OFFICER (MET. POLICE):

No objection, but make recommendations relating to a gate and windows.

THAMES WATER:

No objection

TFL LONDON UNDERGROUND:

No comment

THE WESTMINSTER SOCIETY:

No response to date.

THE ROYAL PARKS:

No response to date.

NATURAL ENGLAND:

No response to date

VICTORIA BID:

No response to date

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED:

No. Consulted: 370

No. of replies: 1

No. of objections: 1

One objection received from a local resident on the following grounds:

- Noise mitigation, residents should be helped to mitigate the impact of noise, possibly with support in installing additional windows facing the site;
- Concerns about benches in the street scape on Petty France;
- Additional planting/ greenery should be provided on the Petty France frontage; and
- The area lacks cycle parking, which should be installed on the Petty France street scene.

PRESS NOTICE/ SITE NOTICE:

Yes

5.2 Applicant's Pre-Application Community Engagement

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

Drawings and photographs of the existing facilities within the application site and drawings of the proposed building, together with a covering letter, were e-mailed to the following stakeholder organisations and specialist bodies on 21 November 2022:

- Royal Parks;
- Historic England;
- Ministry of Justice (C/o Government Property Agency);
- Victoria, Westminster & Whitehall Business Improvement Districts, (BIDs);
- Westminster Society; and
- Residents' Society of Mayfair & St. James

Letters were also e-mailed to the three Ward Councillors for their information, advising them of the proposals for the site and the on-going consultation and of the intention to submit a planning application for the works in late December 2022.

In addition, letters enclosing plans and photographs illustrating the proposals were sent to residential properties along Petty France who might potentially be affected by the proposals. Letters were sent to all occupiers of Vandon Court, Albany Court and the occupiers of the Adam and Eve Public House.

6. WESTMINSTER'S DEVELOPMENT PLAN

6.1 City Plan 2019-2040 & London Plan

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

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

6.2 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 (December 2023) unless stated otherwise.

7. BACKGROUND INFORMATION

7.1 The Application Site

The application site is within Wellington Barracks, which is located to the south of Birdcage Walk, in central London. Wellington Barracks consists of an irregularly shaped site, between Birdcage Walk and Petty France. Birdcage Walk runs along the northern boundary of the site, with St James's Park beyond. The northern boundary is formed by cast iron railings, affording views of a large parade ground, located close to the site boundary; the majority of buildings are located within the southern two thirds of the site, which is relatively densely developed. Buildings are located close to the highway boundary along much of the south and southwestern boundaries, their appearance softened by a narrow landscape strip in some areas. To the east, the Barracks adjoins an office building; to the south, Petty France runs along the site boundary, with mixed use development beyond; to the southwest, it abuts Buckingham Gate, with mixed use development beyond.

The application site is located adjacent the eastern boundary of the Barracks site, in an area already utilised for band facilities. The site lies between a 1980's accommodation block and an office building occupied by the Ministry of Justice, immediately adjacent the site boundary. It is occupied by a linear, single storey building containing rehearsal rooms, with a basement; there is a small sunken area between the building and site boundary.

7.2 Recent Relevant History

Various minor applications for repairs and refurbishment works to the exterior, roofs, and windows. None are directly relevant to the rehearsal halls.

8. THE PROPOSAL

The proposed development will provide new band practice, changing and storage facilities for the five bands of the Foot Guards, to replace existing facilities that the applicant states are significantly under-sized and not suited to modern requirements.

The scheme therefore seeks to deliver larger and improved facilities needed for the Guards to be able to undertake practice sessions and also to prepare for ceremonial events. The new facilities will comply with modern Health and Safety requirements.

The works can be described as follows:

- Extension of the existing basement floor plan to the east, to form a larger and reconfigured basement space (Refurbishment works to the existing basement area do not form part of the planning application);
- Demolition of the existing band practice building and its replacement with a new building of similar height but a larger footprint; and incorporating a 'roof deck' element, from the west elevation of the new band practice building, linking it to the accommodation building, to the west.

9. DETAILED CONSIDERATIONS

9.1 Land Use

City plan policy 1 (Westminster's spatial strategy) seeks to protect and enhance uses of international and/or national importance, and the buildings that accommodate them.

The proposal involves the demolition of the existing rehearsal hall, comprising 553 sqm., and its replacement with a larger rehearsal hall comprising 1190 sqm. At basement level, the existing basement floor plan will be extended eastwards creating an additional 87.5 sqm.

The internal reconfiguration of the basement area would contain four changing spaces to allow for varying gender mixes, improved shower and toilet facilities, general stores (for instrument, travel and general storage), plant spaces and the existing percussion rooms and small practice rooms.

The new upper storey (ground floor) would contain rehearsal halls, ensemble rehearsal rooms, small practice rooms and a crew room.

The proposed enhancement of The Wellington Barracks band practice facilities is considered to accord with City plan policy 1.

9.2 Environment & Sustainability

In accordance with Policy 36 of the City Plan and the LPA's Environmental SPD and Policies SI2, SI4 and SI13 of the London Plan the proposal will incorporate measures to minimise its environmental impact whilst at the same time making the buildings resilient to the impacts of climate change.

The application is supported by a package of assessments, which have fed into the Sustainability Appraisal and DREAM V7 assessment, (the Ministry of Defence's own version of BREEAM):

- Adaptation to Climate Change report;
- Net Zero Carbon / Whole Life Carbon Strategy;
- Part L Assessment;
- Sustainability Appraisal;
- Sustainability Strategy;
- Thermal Comfort Assessment.

The Adaptation to Climate Change report identifies the risk to the use of the building arising from Climate Change, appropriate mitigation strategies and design responses. It recommends:

- Reinforcement of the building structure, including roofs and increasing the capacity of guttering and drainage down-pipes;
- Flood resistant materials such as steel skirting boards and solid flooring; damage minimisation through, removable/replaceable doors on fitted cupboards; relocation of electrical plugs and appliances;
- The buildings above ground drainage design should consider the implications of climate change and, how it can accommodate a potential 50% in rainfall increase by the 2080s;
- Installing artificial cooling system in the mechanically ventilated crew room;
- Incorporating external shafting to reduce the cooling requirement in the building by preventing solar access;
- Reducing the glazing area can help maintain thermal comfort by reducing heat gain and loss.

The Net Zero Carbon Strategy identifies general design requirements that will be required of the building envelope and fixed services in order to produce a high-performance building, including parameters such as building form, fabric efficiencies and

Mechanical, Electrical and Plumbing efficiencies. It presents a set of options to minimise the embodied carbon of the project, in which the building's carbon footprint could be reduced to 380 kgCO₂e/m² (excluding sequestration) for upfront embodied carbon and 710 kgCO₂e/m² for whole life carbon (excluding B6-B7), again excluding external works.

The Part L Assessment summarises the results of an assessment to determine the compliance of the building with Part L of the UK Building Regulations. The results of the analysis indicate that the proposed design meets the minimum requirements of the Building Regulations.

The Sustainability Appraisal summarises the targets for each of the Sustainability themes, the current project performance, and the actions to be carried out. has been a fundamental element in setting the direction of travel for the project and targets DREAM 'Excellent' standard for the design.

The Sustainability Strategy presents the Sustainability Strategy set out for the Band Practice Facility at Wellington Barracks, following the RIBA Sustainable Outcomes. It summarises the targets for each of the outcomes, the current project performance, and the actions to be carried out.

The Thermal Comfort Assessment looks at whether the building meets the thermal comfort criteria whilst maximising energy efficiency using passive measures of environmental control, under current and future weather. Both current and future weather thermal modelling results show that, in Summer, all artificially cooled spaces are thermally comfortable; but indoor overheating risk occurs in mechanically ventilated crew room. (The report recommends the installation of an artificial cooling system in the crew room). In Winter, the building design and services strategy deliver thermal comfort levels under the design parameters.

The Sustainability Appraisal and DREAM V7 assessment demonstrate that the proposal is considered to be, at this stage, in broad compliance with the LPA's Environmental SPD, which requires development to meet climate change objectives and achieve a high standard of environmental sustainability.

Whole Life-cycle Carbon and Circular Economy

London Plan Policy SI 2 requires developers to calculate and reduce Whole Life-Cycle Carbon (WLC) emissions. Developments should calculate WLC emissions through a nationally recognised WLC assessment and demonstrate actions taken to reduce life-cycle carbon emissions. The justification for City Plan Policy 38 explains the possibility of sensitively refurbishing or retrofitting buildings should also be considered prior to demolition and proposals for substantial demolition and reconstruction should be justified based on WLC impact. This is also echoed in the Council's Environmental SPD.

London Plan Policy D3 and SI 7 promotes circular economy outcomes and states developments should aim to be net zero-waste and promotes a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. City Plan Policy 37 states the council will promote the Circular Economy and contribute to the London Plan targets for recycling and for London's net self-sufficiency by 2026.

The proposals to demolish the building has been reviewed by the council's sustainability officer. In principle the scheme is found to be acceptable, however the applicant has provided little information on the WLC assessment and there are some statements within the application that require further clarification.

The Applicant has stated that the benchmark used for their WLC assessment is BPS-0.1 v6 New Built, which refers to the Building Performance Standard issued by the Ministry of Defence for their buildings, but it is not a benchmark that is aligned with the Paris Agreement.

The Applicant has stated that the assessment they've done resulted in upfront carbon of 441 kgCO₂e/m² and 775 kgCO₂e/m². This is LETI Band B and RIBA band C, which is aligned with the council's emerging Retrofit First policy requirement and current best practice. It is recommended that the application is conditioned to comply to these benchmarks (subject to planning approval) as they are aligned with current climate targets both in the industry as well as the council's Net Zero commitment and emerging policy.

In summary, the overall embodied carbon is not considered high in comparison to other major schemes, but it is recommended that a pre-commencement condition is attached to ensure that the applicant submits an updated WLC Assessment at various stages post planning to ensure that monitoring and level of ambition is continuously followed through every phase of the development.

A pre-commencement condition is also recommended to ensure that a Circular Economy statement is submitted to and approved by the council based on a pre-demolition audit and construction processes.

Flood Risk & Sustainable Drainage

The site is inside Flood Risk Zone 3, which indicates a risk of tidal flooding from the Thames, although this part of London is protected to a very high standard by the Thames tidal flood defences such that there is up to a 1 in 1000 (0.1%) chance in any year flood event.

In accordance with City Plan Policy 35, the applicant has provided a Flood Risk Assessment and Surface Water Drainage Strategy.

The Environment Agency have assessed the proposal and state they have no objection to the proposed development as they are satisfied with the applicant's assessment, including that the developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data and that the proposal has adequate safe means of access and/or egress in the event of flooding.

City Plan Policy 35 also requires new development to incorporate Sustainable Drainage Systems (SuDS) to help alleviate the risk of flooding and reduce water run-off, and the applicant has submitted a SuDS strategy. It sets out that the development that will manage runoff from the site for all surface water flood events and a combination of SuDS features such as green roof planting, tree pits, and filter drains to manage surface water.

Land Contamination

City plan *Policy 33(E) (Local environmental impacts)* and the council's the Council's Environmental SPD require applicants to carry out contaminated land assessments and take appropriate remediation measures for development on or near a site which is potentially contaminated. T

The applicant has carried out a preliminary geo-environmental risk assessment has been undertaken in accordance with current regulatory guidance (Guidance for the Safe Development of Housing on Land Affected by Contamination, R&D Publication (2008) and the Environment Agency Land Contamination Risk Management (2020)) to consider the significance of potential contamination. It found the overall preliminary risk for is considered Moderate to Very Low

A condition is recommended requiring further detailed site investigation to find out if the building or land are contaminated with dangerous material, to assess the contamination that is present, and to find out if it could affect human health or the environment. This site investigation must meet the water, ecology and general requirements outlined in 'Contaminated Land Guidance for Developers submitting planning applications' - produced by Westminster City Council in January 2018.

Environment & Sustainability Summary

Overall, the applicant's submission is considered to demonstrate the development will likely result in an acceptable environmental impact. This is subject to recommended conditions, with regard to an updated WLC Assessment at various stages post planning to ensure that monitoring and level of ambition is continuously followed through every phase of the development; as well as a Circular Economy statement to be approved by the council based on a pre-demolition audit and construction processes.

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.

The proposal is supported by landscaping plans and an Arboricultural Impact Assessment (AIA) that details improvements to the landscaping around the site as. The new landscaping would result in the removal of some existing trees, but the Arboricultural Manager has no objection to their removal subject to suitable replacements, secured by condition.

The applicant proposes numerous new green elements within the site, including a new roof garden area with green roof planting at first floor deck level, as well as planting surrounding the building. A condition is recommended to ensure details of the soft and hard landscaping are provided.

9.4 Townscape, Design & Heritage Impact

Legislative & Policy Context

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 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.

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 contribution to Westminster’s townscape and streetscape.

Policy 39 Westminster’s Heritage: With regards to (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 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.

Townscape and design

The Barracks site, which lies within the Birdcage Walk Conservation Area, comprises a nineteenth century stucco fronted range (grade II listed) which front the parade ground fronting Birdcage walk, grade I/II listed Guards Chapel and a complex of twentieth century interlocking concrete buildings (1979-85 George, Tew and Dunn Architects) occupying the south of the site.

Proposals seek the redevelopment of the rehearsal rooms, which are contained within a linear block which lies at the eastern end of the site, within the setting of the grade II and I/II listed buildings. The rehearsal rooms are sandwiched between and 1979-85 accommodation block and the Ministry of Justice, which itself lies outside of the conservation area.

The rehearsal rooms are contained within three interlinked rendered blocks, with metal glad roofs. The building is identified as an unlisted building of merit within the Birdcage

Walk Conservation Area Audit. The northern end of the block fronts directly onto Petty France, whilst the southern end can be viewed from Birdcage walk, being set back from the parade ground but within the setting of the Guardhouse (II), and Guards Chapel (IISTAR)

The existing building is a linear block with simple unadorned facades and concluded by three metal clad faceted roofs. Glazing is limited to roof level within dormer style elements. Its height and overall scale are modest in the context of neighbouring buildings which allows it to lie unassumingly within the setting of the nearby listed buildings.

Proposals seek the demolition of much of the building above the ground plane, whilst retaining and reutilising the basement. In light of the building being identified as an unlisted building of Merit, its demolition needs to be balanced against the design quality of the proposed replacement building. Its demolition is also judged against the environmental policies within Westminster's City Plan 2019 – 2040 and the City Councils Environmental SPG, which are very much in favour of retrofit and minimising the loss of fabric.

The proposed new building will comprise of three interlinked buildings with pitched bronze clad, lantern style roofs, set above clearstorey glazing. The footprint of the building will be extended westward to provide a direct link at ground floor level with the accommodation block. The height and overall scale of the building remains comparable to the existing buildings, maintaining its subservient relationship with the nearby listed buildings, which is welcome. The three main buildings are intended to be constructed in lime washed brick, incorporating vertical depressions. It is felt that brick would offer a texture and visual richness to the facades, important given a large extent of the exterior will be largely void of fenestration due to its functionality and for security. The two smaller scaled linking buildings are to be clad in bronze, continuing the material palette of the principal blocks.

The loss of the existing building is regrettable; however, the replacement buildings exhibit a high level of design and aesthetic quality and would respect the setting of the nearby listed buildings and enhance the character and appearance of the Birdcage walk conservation area. The proposals are not felt to result in harm to heritage assets and are supported on design and townscape grounds.

9.5 Residential Amenity

City Plan Policies 7 (Managing development for Westminster's people) and 33 (Local environmental impacts) seek to ensure developments are neighbourly and avoid detrimental impacts on neighbours including in terms of loss of light, increased sense of enclosure and loss of privacy. They also seek to protect local environmental quality and ensure residents are not harmed in terms of noise and vibrations.

The music rehearsal rooms are contained within a linear block which lies at the eastern end of the site, sandwiched between the Barracks accommodation block and the Ministry of Justice. The replacement building would increase the height of the existing building by 3m, mostly due to the new roof structure, and has a larger footprint extending eastwards towards the Ministry of Justice. In this location the new building is not

considered to be considerably distant from the nearest residential occupiers on the opposite side of Petty France, and as such will not result in harm in terms of loss of light, increased sense of enclosure, or loss of privacy to neighbours.

Noise & Vibration

Mechanical Plant

The proposal includes new plant comprises air handling units (AHUs), extract fans, fan coil units (FCUs) and mechanical ventilation and heat recovery (MVHR) units which are to be located internally and designed to ensure minimal impact on internal noise levels to the new facility. As well as these 3 heat pump units are to be installed in an external plant area.

The acoustic report identifies the nearest noise sensitive receptors to include rooms within the barracks itself and residential receptors at 81 Petty France. In addition, offices to the Ministry of Justice (MoJ) are adjacent to the proposed rehearsal hall.

The acoustic report demonstrates that the proposed plant is likely to comply with the design level criterion for the proposed hours of operation at the residential receptors. Compliance with British Standard 823:2014 should also be achieved at the MoJ offices.

Noise break out

In relation to music noise break out, the acoustic report sets a fairly stringent design level for music noise by designing music noise to 10 dB below the lowest background noise level across the octave range. A preliminary assessment of music break-out based on external wall, roof, and glazing sound insulation properties highlighted within this report has identified that compliance is expected against the limits.

Environmental Sciences has reviewed the acoustic details submitted with this application and raise no objection subject to the council's noise conditions, including a condition to control the hours of operation of the rehearsal facility to 0800 to 2000 hours daily. This relates to both the mechanical plant associated with the facility and music played in the building.

9.6 Transportation, Accessibility & Servicing

Highway Impact/ Building Line

The building does not have direct access to the highway. The southern flank abuts the highway (Petty France). There is an access point in the site permitter to the west of the building, however, this is protected by a line of bollards on the highway, therefore no direct vehicle access is possible.

There are changes proposed to the façade and interaction between the building and Petty France. The drawings (including elevations and cross-sections) for this element are of limited detail.

Policy 25A states "Development must promote sustainable transport by prioritising walking and cycling in the city."

Policy 28A states "Given the increasing demands on existing highway space, the council will resist the loss of highway land, particularly footways."

Policy 43 is aimed at creating an improved public realm and environment for pedestrians and other users of an area, including to minimise obstruction to pedestrian movement.

Westminster Way strives to promote walking through design that aids rather than disadvantage pedestrians. This includes maintaining pedestrian desire lines.

It is accepted the building extension towards Petty France is within the shadow of the adjoining building and will not be a significantly detrimental impact to pedestrian movement.

On balance, in highway terms, the proposed amendment to the building line is considered acceptable in highway terms in this instance. An area that has been open and passable for at least the last 20 years (and presumably since the existing building was erected) is likely to have gained highway status. The applicant has agreed to apply to formally stop up the highway to implement the proposed development prior to any obstruction occurring.

Servicing and Waste & Recycling Storage/ Cycling & Cycle Storage

No details of cycle parking or waste storage are provided. It would be usual for a redevelopment of this nature to be encouraged to provide both cycle parking and waste storage to current standards to assist with supporting active travel and meeting waste reduction and recycling targets. However, the specific nature of the site and the use is noted and it is accepted that in this case the wider site contributes to these measures in highway and transport terms.

It is accepted that servicing for the building occurs within the wider site and will not adversely affect the highway.

9.7 Economy including Employment & Skills

The nature of the floorspace proposed does not require an employment and skills plan, though the proposal will contribute positively to the local economy during the construction phase through the generation of increased opportunities for local employment, procurement, and spending.

9.8 Other Considerations

Construction impact

City Plan Policy 33 requires projects which have significant local impacts to mitigate their effects during construction through compliance with the Council's Code of Construction Practice (CoCP).

It is inevitable that the construction will cause noise and disturbance to local residents and businesses. However, it is considered that through appropriate controls and careful management, the impact from construction works can be mitigated. The CoCP has been developed to mitigate against construction and development impacts on large and complex development sites and basement excavation works.

A condition is recommended to ensure that the development complies with the City

Council's Code of Construction Practice (COCP) which requires the developer to provide a Site Environmental Management Plan (SEMP) and funding for the Environmental Inspectorate to monitor the demolition and construction phase of the development. The COCP sets out the minimum standards and procedures for managing and minimising the environmental impacts of construction projects within Westminster and relate to both demolition and construction works.

The key issues to address in the COCP are; liaison with the public; general requirements; SEMP; construction management plans; employment and skills; traffic and highways; noise and vibration; dust and air quality; waste management; waste pollution and flood control and any other issues.

The Councils standard condition controlling hours of building work is also recommended.

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

Planning obligations are not relevant in the determination of this application.

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 conditions to secure the following:

- Evidence to demonstrate the development will be bound by the Code of Construction Practice.
- Whole Life-cycle Carbon Assessments.
- Updated Circular Economy Statement.
- Contaminated Land Assessment
- Details of the stopping up of highway on Petty France frontage.
- Tree protection method statement

10. Conclusion

The applicant states that the existing band facilities do not meet current Health and Safety standards and they are under-sized for the types of bands based there. As such this proposal to redevelop the rehearsal hall is necessary to improve this infrastructure.

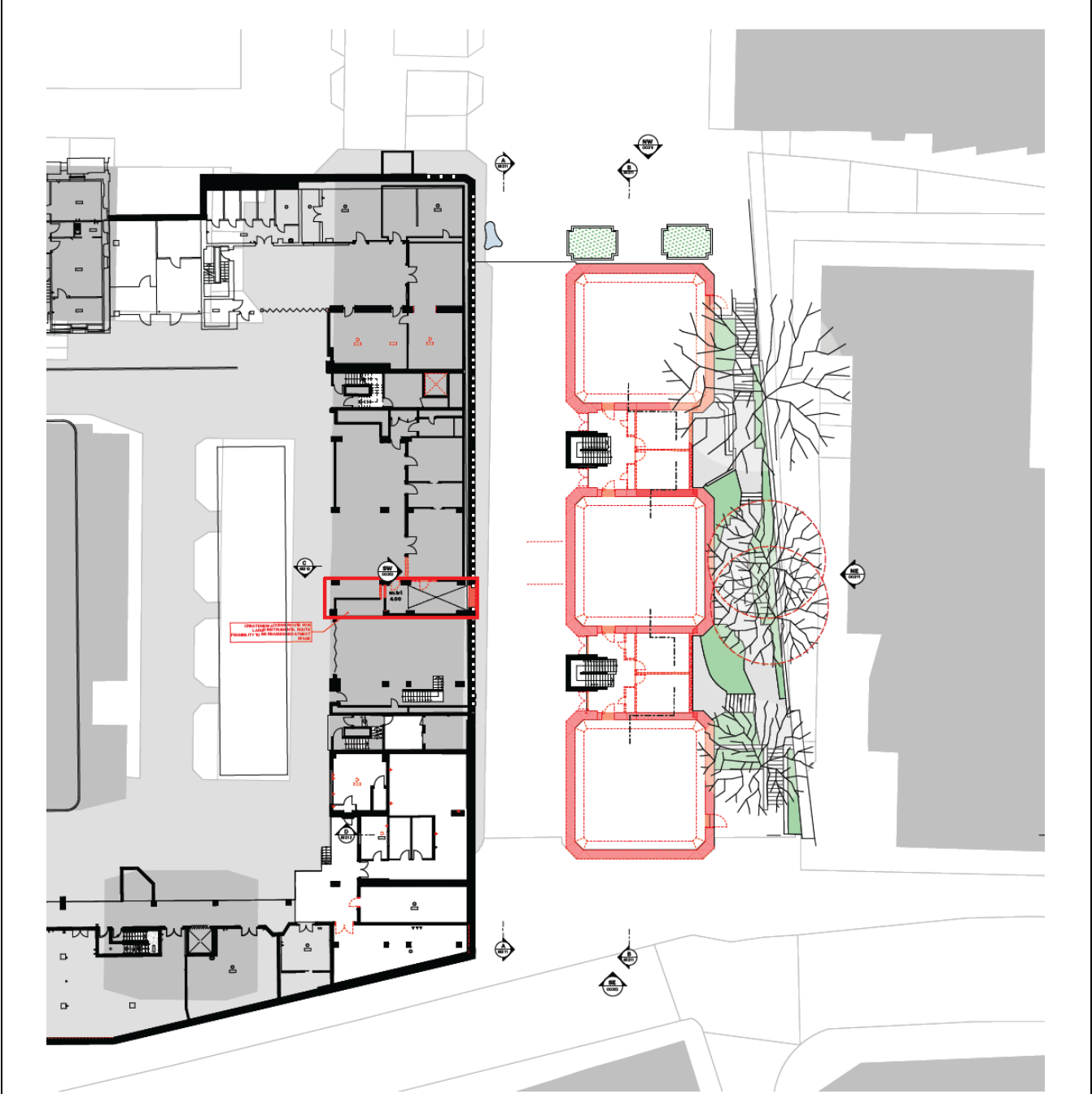
The proposed enhancement of the Wellington Barracks band practice facilities is considered acceptable in heritage, townscape, design, land use, amenity,

environmental, basement development and highway terms and the application is recommended for approval subject to the conditions as set out in the draft decision letter.

(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: DAVID DORWARD BY EMAIL AT ddorward@westminster.gov.uk

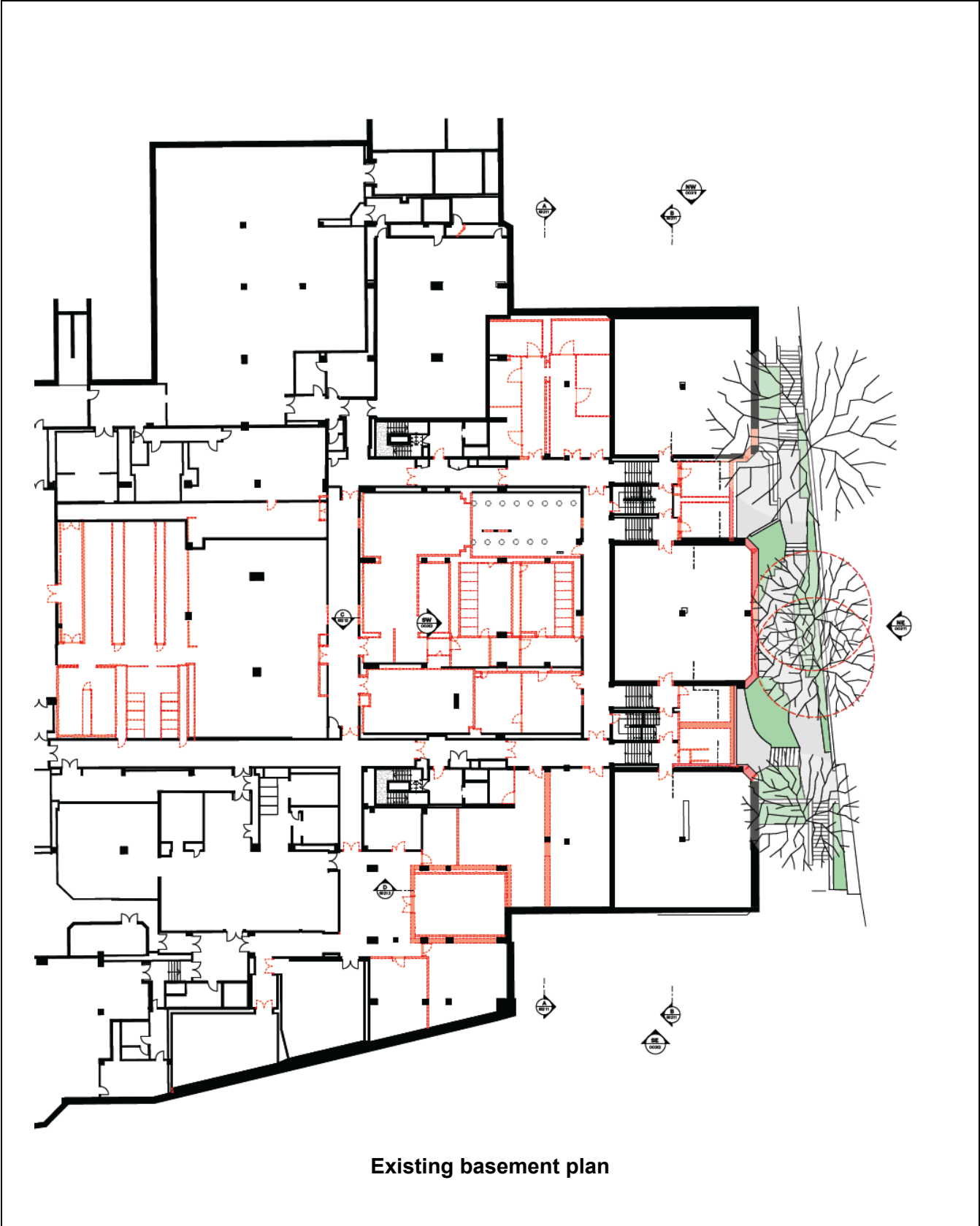
11. KEY DRAWINGS

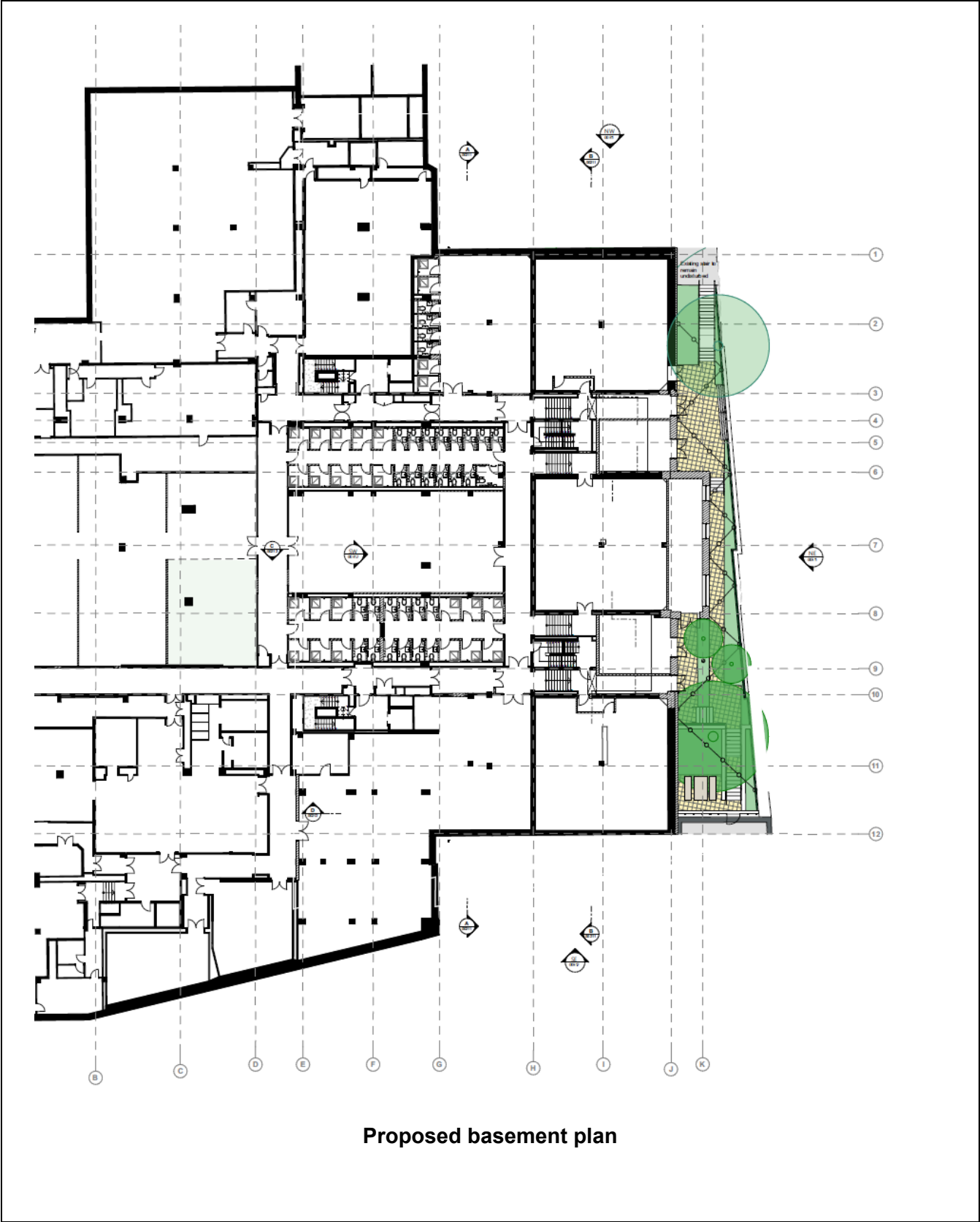


Existing ground floor plan

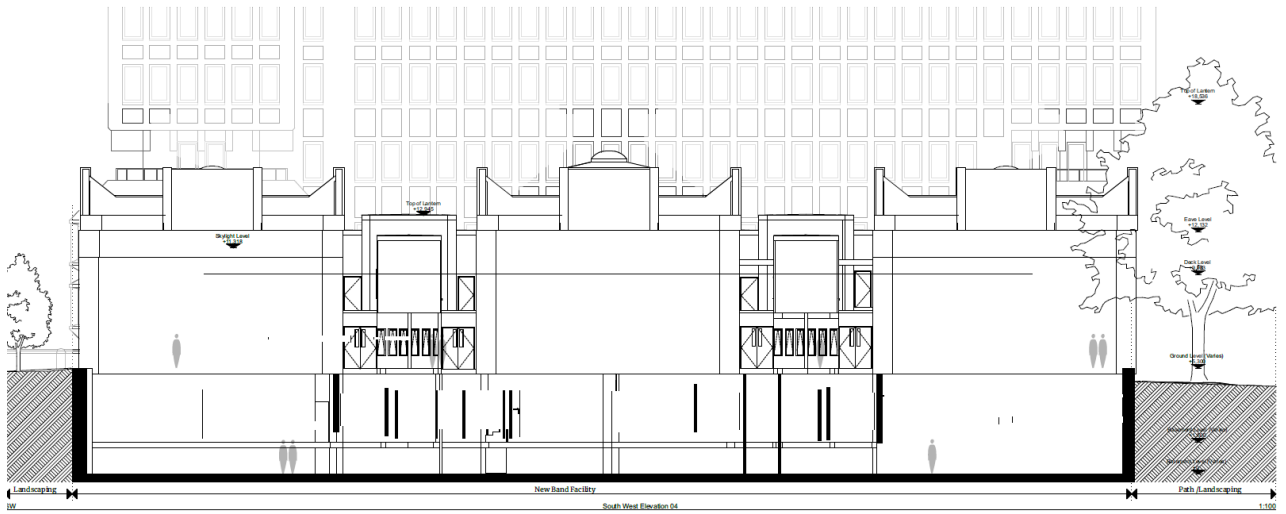
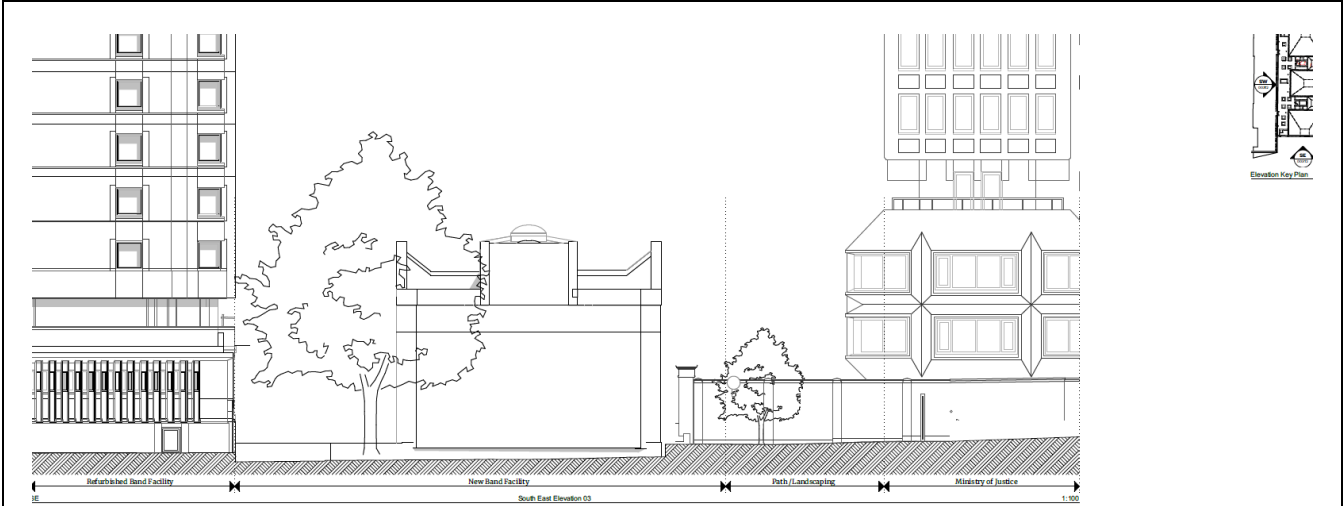


Proposed ground floor plan

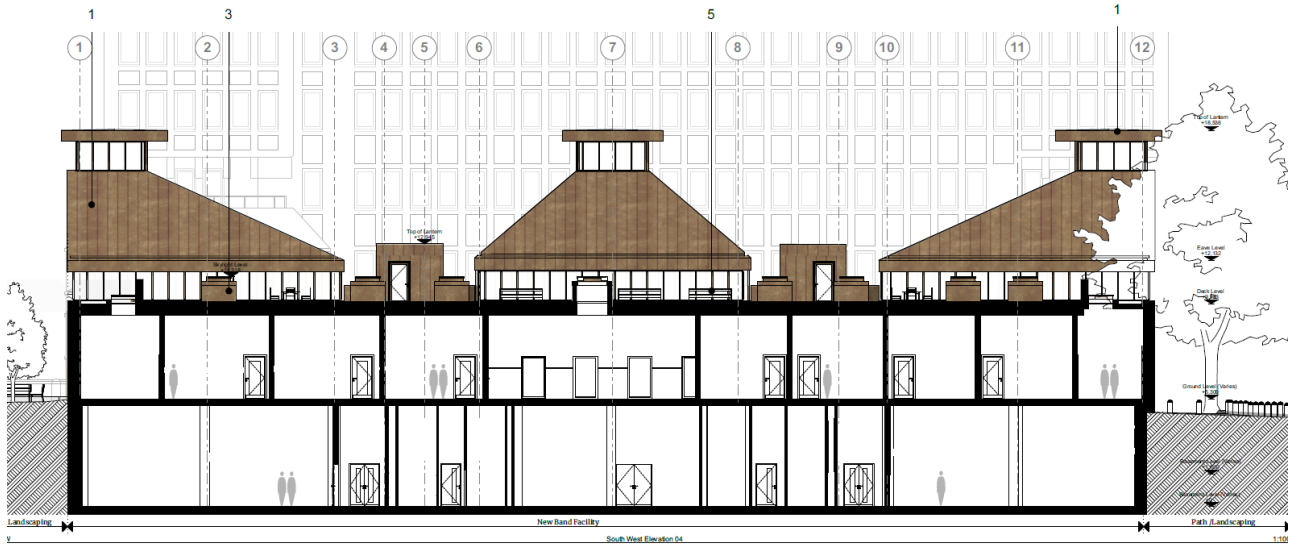
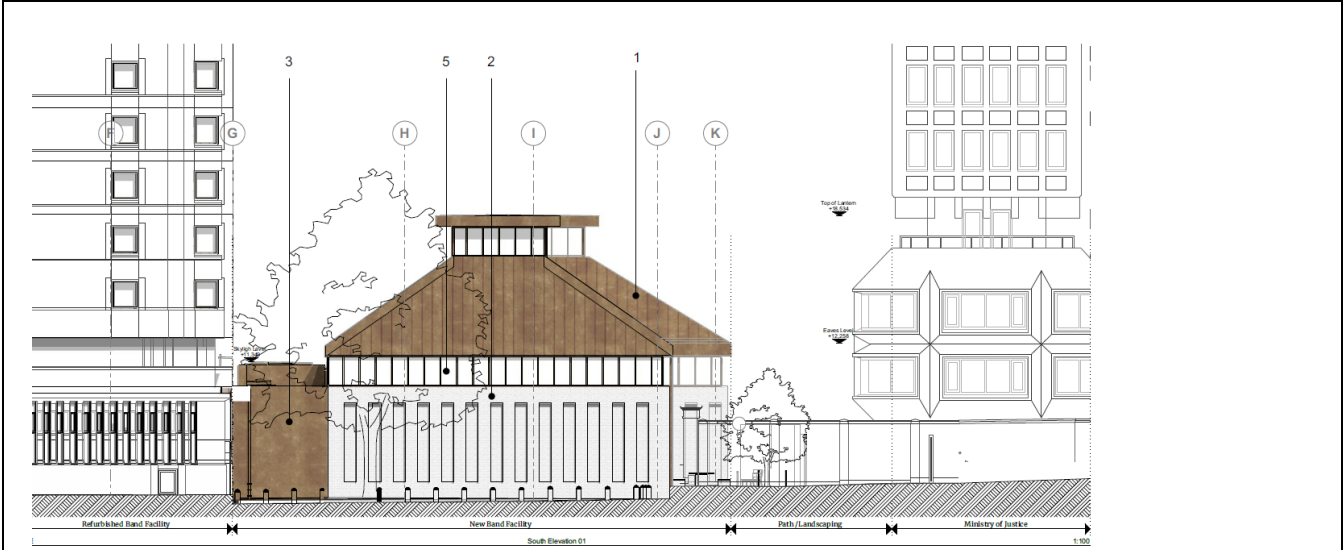




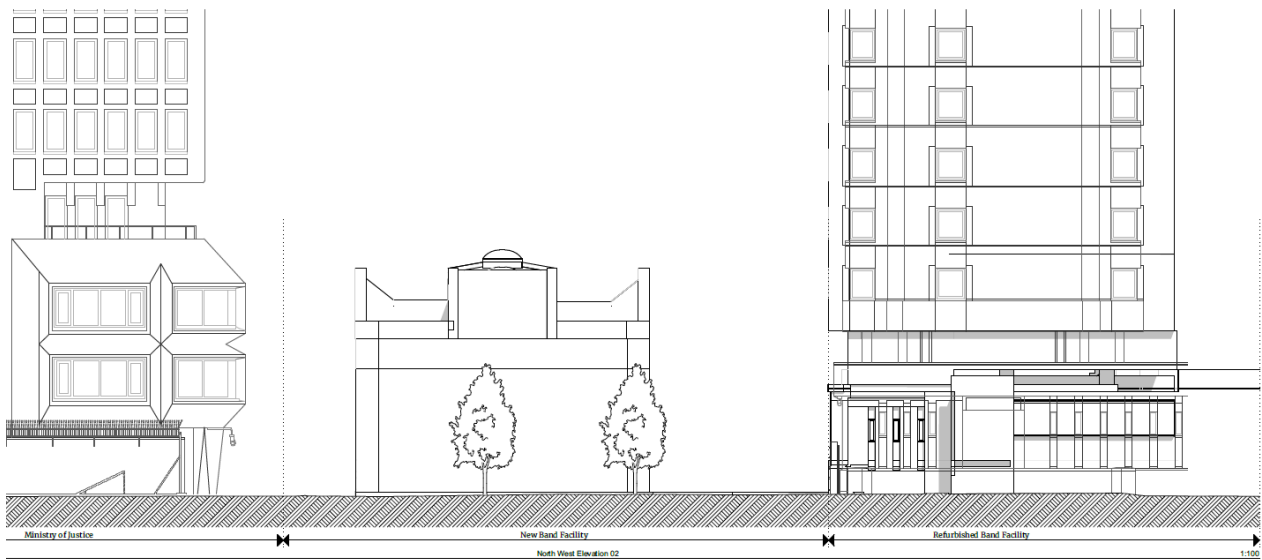
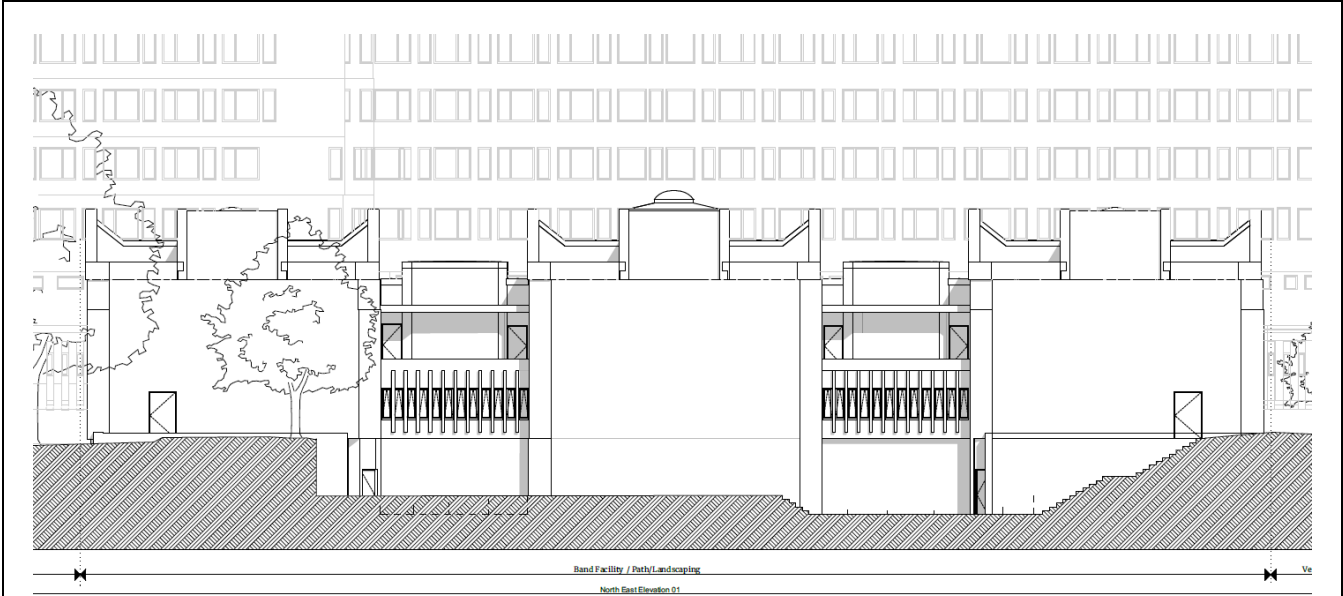
Proposed basement plan



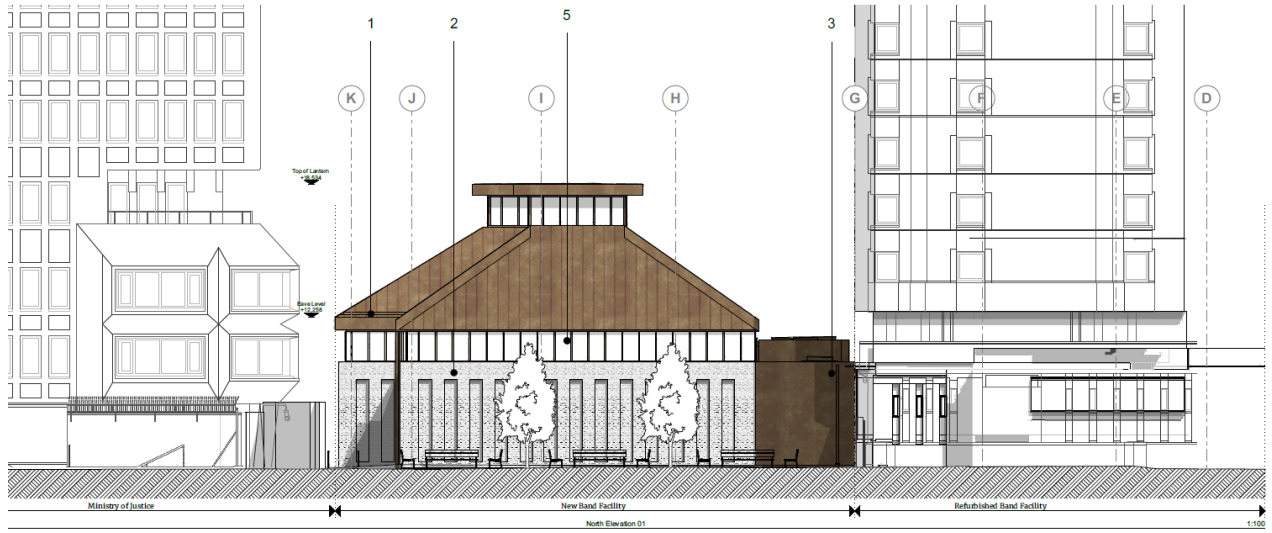
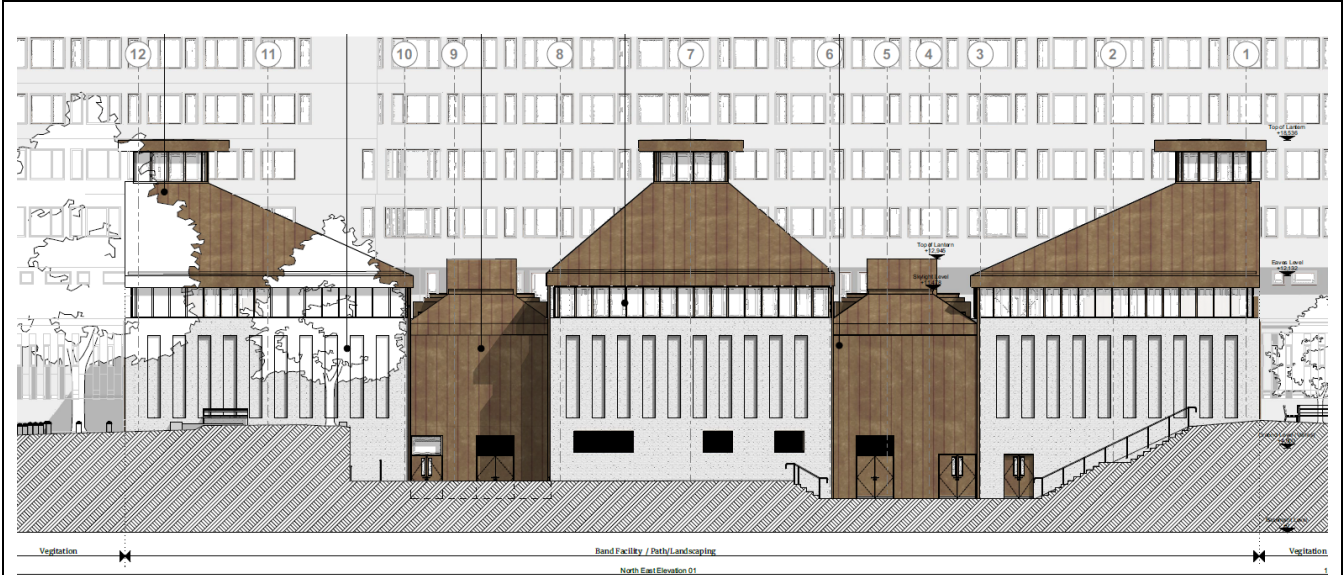
Existing Petty France frontage and cross section



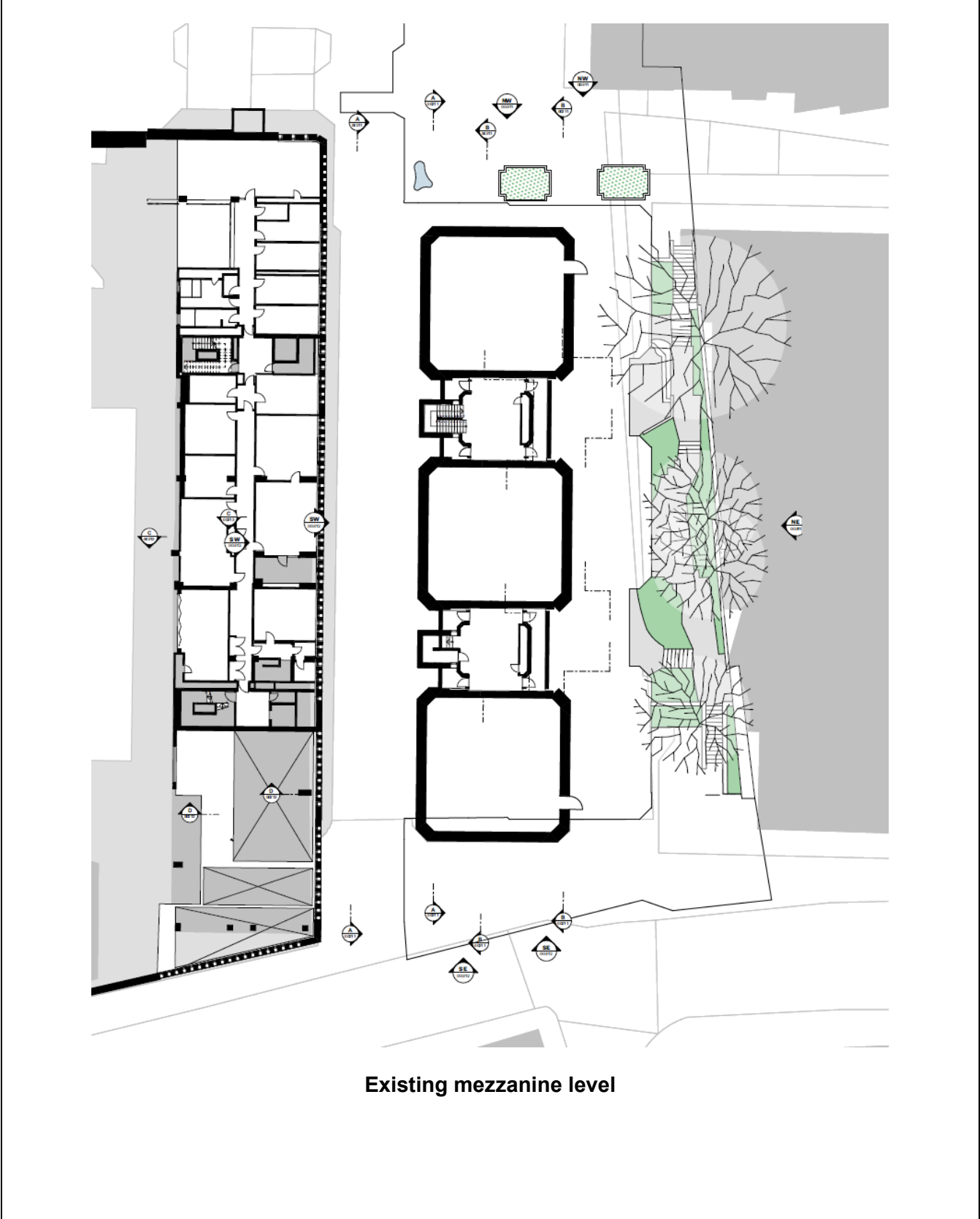
Proposed Petty France frontage and section



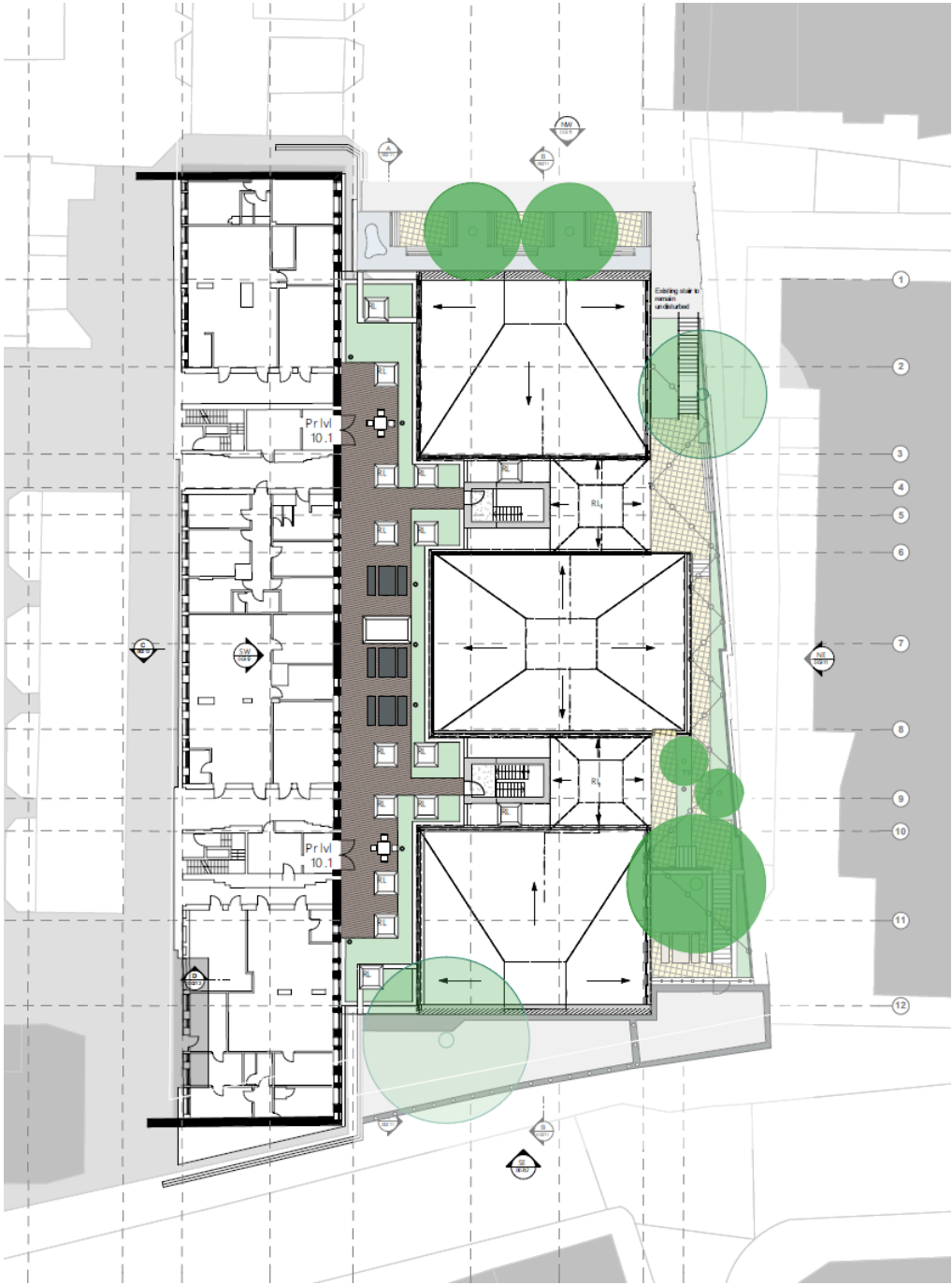
Existing side/ east and north elevations



Proposed side/ east and north elevations



Existing mezzanine level



Proposed first (deck) level



Visualisations of Petty France frontage and first (deck) level

DRAFT DECISION LETTER

Address: Wellington Barracks, Birdcage Walk, London, SW1E 6HQ

Proposal: Redevelopment of band practice facilities including demolition of existing rehearsal halls and erection of new extension to provide larger rehearsal halls, including reconfiguration at basement level to provide new band practice, changing and storage facilities for the bands of the Foot Guards.

Reference: 23/05458/FULL

Plan Nos: Existing: , Z9A8968Y19-HLM-WELL00-ZZ-DR-A-100001 P03;, Z9A8968Y19-HLM-WELL00-ZZ-DR-A-100002 P03;, Z9D2166Y19-HLM-WELL00-F00-DR-A-00101 P02;, Z9D2166Y19-HLM-WELL00-M01-DR-A-00102 P02;, Z9A2905Y21-HLMWELL00WELL011-XX-DRA-100321 P01;, Z9A2905Y21-HLMWELL00WELL011-XX-DRA-100322 P01;, Z9A2905Y21-HLMWELL00WELL011-XX-DRA-100221 P01;, Z9A2905Y21-HLMWELL00WELL011-XX-DRA-100222 P01;, Demolition: , Z9A8968Y19-HLM-WELL00-B01-DR-A-100120 P04;, Z9A8968Y19-HLM-WELL00-F00-DR-A-100121 P04;, Z9A8968Y19-HLM-WELL00-M01-DR-A-100122 P04;, Z9A8968Y19-HLM-WELL00-F01-DR-A-100123 P02;, Proposed:, Z9A8968Y19-HLM-WELL00-ZZ-DR-A-100012 P03;, Z9A8968Y19-HLM-WELL00-B01-DR-A-100100 P10;, Z9A8968Y19-HLM-WELL00-F00-DR-A-100101 P10;, Z9A8968Y19-HLM-WELL00-M01-DR-A-100102 P06;, Z9A8968Y19-HLM-WELL00-F01-DR-A-100103 P08;, Z9A8968Y19-HLM-WELL00-XX-DR-A-100311 P04;, Z9A8968Y19-HLM-WELL00-XX-DR-A-100312 P04;, Z9A8968Y19-HLM-WELL00-XX-DR-A-100211 P04;, Z9A8968Y19-HLM-WELL00-XX-DR-A-100212 P04, Landscaping:, Z9A2905Y21-HLMWELL00WELL011-ZZ-DRA-100031 P01;, Z9A2905Y21-HLMWELL00WELL011-XX-DRA-100231 P01;, Z9A8968Y19-HLM-WELL00-ZZ-DR-L-100021 P10;, Z9A8968Y19-HLM-WELL00-XX-DR-L-100201 P03, Z9A8968Y19-HLM-WELL00-RF1-DR-L-100022 P05, Fire Strategy:, Z9A8968Y19-HLM-WELL00-B01-DR-A-175101 P02;, Z9A8968Y19-HLM-WELL00-F00-DR-A-175102 P02;, Z9A8968Y19-HLM-WELL00-M01-DR-A-175103 P02;, Z9A8968Y19-HLM-WELL00-F01-DR-A-175104 P02.

For Information Only:, Planning Statement; Wellington Barracks Statement of Community Involvement; Design and Access Statement; RIBA Stage 3 Fire Safety Strategy; Flood Risk Assessment; Westminster SUDs Proforma; Arboricultural Report and Arboricultural Impact Assessment Report; Heritage Desk Based Assessment; Phase 1 Geo Environmental Desk Study Report; Phase 1 UXO Detailed Risk Assessment; Transport Statement; Townscape and Visual Impact Assessment; Stage 3 RIBA Sustainability Strategy; Stage 3 Sustainability Appraisal; Climate Resilience and Additional Environmental Assessments; Adaptation to Climate Change DREAM Version 7; Daylight Assessment; Part L Assessment; Thermal Comfort Assessment; Designing for Waste Minimisation; Ecological Appraisal; Bat Survey; Net Zero Strategy; Whole life carbon assessment template; Acoustic Report; and Planting , Schedule.

Case Officer: David Dorward

Direct Tel. No. 020 7641
07866038730

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 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)

- 3 **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)

- 4 **Pre Commencement Condition.** You must not start work on the site until we have approved appropriate arrangements to secure the following:

- i) Stopping up of Highway on Petty France frontage.

In the case of the above benefits, you must include in the arrangements details of when you will provide the benefits, and how you will guarantee this timing. You must only carry out the development according to the approved arrangements.

Reason:

To make sure that the development provides the planning benefits that have been agreed, as set out in Policy 25 of the City Plan 2019 - 2040 (April 2021). (R19AD)

- 5 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 make sure that the appearance of the building is suitable and that it contributes to the character and appearance of this part of the Birdcage Walk Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26BF)

- 6 You must apply to us for approval of samples of the facing materials you will use, including glazing, and elevations and roof plans annotated to show where the materials are to be located. You must not start work on the relevant part of the development until we have approved in writing what you have sent us. You must then carry out the work using the approved materials. (C26BD)

Reason:

To make sure that the appearance of the building is suitable and that it contributes to the character and appearance of this part of the Birdcage Walk Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26BF)

- 7 You must apply to us for approval of a sample panel of brickwork including mortar, built on site, which shows the colour, texture, face bond and pointing. You must not start work on this part of the development until we have approved the sample panel in writing. You must then carry out the work according to the approved sample.

Reason:

To make sure that the appearance of the building is suitable and that it contributes to the character and appearance of this part of the Birdcage Walk Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26BF)

- 8 You must apply to us for approval of details of the glazing, framing including materials (colour). 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 make sure that the appearance of the building is suitable and that it contributes to the character and appearance of this part of the Birdcage Walk Conservation Area. This is as set out in Policies 38, 39 and 40 of the City Plan 2019 - 2040 (April 2021). (R26BF)

- 9 **Pre-Commencement Condition.** You must apply to us for approval of an updated version of the Whole Life Carbon Assessment hereby approved at each of the following stages of development:
- a. Prior to commencement of any work on site including all works of deconstruction and demolition.
 - b. Prior to commencement of any construction works.
 - c. Within 3 months of first occupation of the development.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 435 kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 765 kgCO₂e/m², which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised.

You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

The post construction assessment submitted for our approval pursuant to (c) shall demonstrate how the development has been completed in accordance with the updated benchmarks identified in the updated assessment submitted pursuant to part (b).

Reason:

To ensure the development minimises carbon emissions throughout its whole life cycle in accordance with Policy SI2 in the London Plan 2021, Policy 38 in the City Plan 2019 - 2040 (April 2021), the Environmental Supplementary Planning Document (February 2022) and the guidance set out in the Mayor of London's guidance 'Whole Life-Cycle Carbon Assessments' (March 2022).

- 10 **Pre-Commencement Condition**

(a) Prior to commencement of any works on site including works of deconstruction and demolition full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to us and approved by us in writing. The details shall demonstrate that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. You must not carry out any works of demolition until we have approved what you have sent us. The demolition and other pre-construction works shall then be carried out in accordance with the approved details.

(b) Prior to the commencement of any construction works and following completion of RIBA Stage 4, a detailed Circular Economy Statement including a site waste management plan (or updated version of the approved Circular Economy Statement that reaffirms the approved strategy or demonstrates improvements to it), shall be submitted to us and approved by us in writing. The Circular Economy Statement must be prepared in accordance with the GLA Circular Economy Guidance and demonstrate that the development has been designed to meet the relevant targets set out in the guidance. The end-of-life strategy included in the statement shall include the approach to storing detailed building information relating to the structure and materials of the new building elements (and of the interventions to distinguish the historic from the new fabric). The development shall be carried out in accordance with the details we approve and shall be operated and managed throughout its life cycle in accordance with the approved details.

(c) Submit a post-construction assessment in accordance with GLA's adopted Circular Economy Statement guidance within 3 months of first occupation of the development

Reason:

To ensure the development is resource efficient and maintains products and materials at their highest use for as long as possible in accordance with Policy SI7 in the London Plan 2021, Policy 37 in the City Plan 2019 - 2040 (April 2021), the Environmental Supplementary Planning Document (February 2022) and the guidance set out in the Mayor of London's guidance 'Circular Economy Statements' (March 2022). (R17BA)

- 11 The hours of operation of the rehearsal facility and plant/machinery hereby permitted shall not be operated except between 08.00 hours and 20.00 hours daily.

Reason:

To safeguard the amenity of occupiers of noise sensitive receptors and the area generally by ensuring that the rehearsal facility and plant/machinery hereby permitted is not operated at hours when external background noise levels are quietest thereby preventing noise and vibration nuisance as set out in Policies 7 and 33 of the City Plan 2019 - 2040 (April 2021) the Environmental Supplementary Planning Document (February 2022).

- 12 (1) Where noise emitted from the proposed plant and machinery will not contain tones or will not be intermittent, the 'A' weighted sound pressure level from the plant and machinery (including non-emergency auxiliary plant and generators) hereby permitted, when operating at its noisiest, shall not at any time exceed a value of 10 dB below the

minimum external background noise, at a point 1 metre outside any window of any residential and other noise sensitive property, unless and until a fixed maximum noise level is approved in writing by the City Council. The background level should be expressed in terms of the lowest LA90, 15 mins during the proposed hours of operation. The plant-specific noise level should be expressed as LAeqTm, and shall be representative of the plant operating at its maximum.

(2) Where noise emitted from the proposed plant and machinery will contain tones or will be intermittent, the 'A' weighted sound pressure level from the plant and machinery (including non-emergency auxiliary plant and generators) hereby permitted, when operating at its noisiest, shall not at any time exceed a value of 15 dB below the minimum external background noise, at a point 1 metre outside any window of any residential and other noise sensitive property, unless and until a fixed maximum noise level is approved in writing by the City Council. The background level should be expressed in terms of the lowest LA90, 15 mins during the proposed hours of operation. The plant-specific noise level should be expressed as LAeqTm, and shall be representative of the plant operating at its maximum.

(3) Following installation of the plant and equipment, you may apply in writing to the City Council for a fixed maximum noise level to be approved. This is to be done by submitting a further noise report confirming previous details and subsequent measurement data of the installed plant, including a proposed fixed noise level for written approval by the City Council. Your submission of a noise report must include:

- (a) A schedule of all plant and equipment that formed part of this application;
- (b) Locations of the plant and machinery and associated: ducting; attenuation and damping equipment;
- (c) Manufacturer specifications of sound emissions in octave or third octave detail;
- (d) The location of most affected noise sensitive receptor location and the most affected window of it;
- (e) Distances between plant & equipment and receptor location/s and any mitigating features that may attenuate the sound level received at the most affected receptor location;
- (f) Measurements of existing LA90, 15 mins levels recorded one metre outside and in front of the window referred to in (d) above (or a suitable representative position), at times when background noise is at its lowest during hours when the plant and equipment will operate. This acoustic survey to be conducted in conformity to BS 7445 in respect of measurement methodology and procedures;
- (g) The lowest existing LA90, 15 mins measurement recorded under (f) above;
- (h) Measurement evidence and any calculations demonstrating that plant and equipment complies with the planning condition;
- (i) The proposed maximum noise level to be emitted by the plant and equipment.

(C46AC)

Reason:

Because existing external ambient noise levels exceed WHO Guideline Levels, and as set out in Policies 7 and 33 of the City Plan 2019 - 2040 (April 2021) and the Environmental Supplementary Planning Document (February 2022), so that the noise environment of people in noise sensitive receptors is protected, including the intrusiveness of tonal and impulsive sounds, and by contributing to reducing excessive ambient noise levels. Part (3) is included so that applicants may ask subsequently for a fixed maximum noise level to be approved in case ambient noise levels reduce at any time after implementation of the planning permission. (R46AC)

- 13 No vibration shall be transmitted to adjoining or other premises and structures through the building structure and fabric of this development as to cause a vibration dose value of greater than 0.4m/s (1.75) 16 hour day-time nor 0.2m/s (1.75) 8 hour night-time as defined by BS 6472 (2008) in any part of a residential and other noise sensitive property. (C48AB)

Reason:

To ensure that the development is designed to prevent structural transmission of noise or vibration and to prevent adverse effects as a result of vibration on the noise environment in accordance with Policies 7 and 33 of the City Plan 2019 - 2040 (April 2021) and the Environmental Supplementary Planning Document (February 2022). (R48AB)

- 14 You must hang all doors or gates so that they do not open over or across the road or pavement. (C24AA)

Reason:

In the interests of public safety and to avoid blocking the road as set out in Policies 24 and 25 of the City Plan 2019 - 2040 (April 2021). (R24AD)

- 15 **Pre Commencement Condition.** You must apply to us for approval of a method statement explaining the measures you will take to protect the trees on and close to the site. You must not start any demolition, site clearance or building work, and you must not take any equipment, machinery or materials for the development onto the site, until we have approved in writing what you have sent us. You must then carry out the work according to the approved details. (C31CC)

Reason:

To protect the trees and the character and appearance of this part of the Birdcage Walk Conservation Area. This is as set out in Policies 34, 38 and 39 of the City Plan 2019 - 2040 (April 2021). (R31DD)

- 16 You must apply to us for approval of detailed drawings of a hard and soft landscaping scheme which includes the number, size, species and position of trees and shrubs. You must not start work on the relevant part of the development until we have approved in writing what you have sent us. You must then carry out the landscaping and planting within five years of completing the development (or within any other time limit we agree to in writing).
If you remove any trees that are part of the planting scheme that we approve, or find that they are dying, severely damaged or diseased within five years of planting them, you must replace them with trees of a similar size and species. (C30CC)

Reason:

To improve the appearance of the development, to make sure that it contributes to the character and appearance of this part of the Birdcage Walk Conservation Area, 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). (R30CE)

- 17 {b Pre Commencement Condition}. You must carry out a detailed site investigation to find out if the building or land are contaminated with dangerous material, to assess the contamination that is present, and to find out if it could affect human health or the environment. This site investigation must meet the water, ecology and general requirements outlined in 'Contaminated Land Guidance for Developers submitting planning applications' - produced by Westminster City Council in January 2018.

You must apply to us for approval of the following investigation reports. You must apply to us and receive our written approval for phases 1, 2 and 3 before any demolition or excavation work starts, and for phase 4 when the development has been completed but before it is occupied.

Phase 1: Desktop study - full site history and environmental information from the public records.

Phase 2: Site investigation - to assess the contamination and the possible effect it could have on human health, pollution and damage to property.

Phase 3: Remediation strategy - details of this, including maintenance and monitoring to protect human health and prevent pollution.

Phase 4: Validation report - summarises the action you have taken during the development and what action you will take in the future, if appropriate.
(C18AA)

Reason:

To make sure that any contamination under the site is identified and treated so that it does not harm anyone who uses the site in the future. This is as set out in Policy 33(E) of the City Plan 2019 - 2040 (April 2021). (R18AB)

Informatives

- 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 HIGHWAYS LICENSING:

Under the Highways Act 1980 you must get a licence from us before you put skips or scaffolding on the road or pavement. It is an offence to break the conditions of that licence. You may also have to send us a programme of work so that we can tell your neighbours the likely timing of building activities. For more advice, please visit our website at www.westminster.gov.uk/guide-temporary-structures.

CONSIDERATE CONSTRUCTORS:

You are encouraged to join the nationally recognised Considerate Constructors Scheme. This commits those sites registered with the Scheme to be considerate and good neighbours, as well as clean, respectful, safe, environmentally conscious, responsible and accountable. For more information please contact the Considerate Constructors Scheme directly on 0800 783 1423, sitenquiries@ccscheme.org.uk or visit www.ccscheme.org.uk.

BUILDING REGULATIONS:

You are advised that the works are likely to require building regulations approval. Details in relation to Westminster Building Control services can be found on our website at www.westminster.gov.uk/contact-us-building-control

- 3 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. 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).
- 4 You are advised that the works are likely to require building regulations approval. Details in relation to Westminster Building Control services can be found on our website at www.westminster.gov.uk/planning-building-and-environmental-regulations/building-control.
- 5 You will have to apply separately for a licence for any structure that overhangs the road or pavement. For more advice, please email Jeff Perkins at jperkins@westminster.gov.uk.
- 6 In Condition 9 (Whole Life Carbon Assessment) the reference to deconstruction means works to strip out and remove fabric from the existing building as identified within the 'Designing for Waste Minimisation DREAM Version 7' report dated 21.04.2022 that was submitted with the application.
- 7 In relation to the assessment required pursuant to part (c) of Condition 9, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line

with the GLA's Whole Life-Cycle Carbon Assessment Guidance: LPG document template (green) ([london.gov.uk](https://www.london.gov.uk)). To support the results provided in the template, the following minimum evidence requirements should also be submitted:

- (a) site energy (including fuel) use record,
- (b) contractor confirmation of as-built material quantities and specifications,
- (c) record of material delivery including distance travelled and transportation mode (including materials for temporary works),
- (d) waste transportation record including waste quantity, distance travelled, and transportation mode (including materials for temporary works) broken down into material categories used in the assessment,
- (e) a list of product-specific environmental product declarations for the products that have been installed.

The data collected must demonstrate compliance with the Whole Life Carbon Assessment approved at application stage, as updated pursuant to parts (a) and (b) of the condition, and will provide an evidence base that informs future industrywide benchmarks or performance ratings for building typologies. In addition to submitting this information to the Council pursuant to the requirements of part (c) of the condition, where the original application was referable to the Mayor of London you should also submit the post-construction assessment to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the requirements of the Mayor's guidance. (I17AB)

- 8 The pre-demolition audit and Circular Economy Statement required by Condition must accord with the guidance set out in the London Plan Guidance 'Circular Economy Statements' (2022). The demolition audit should follow best practice and include how the value of existing building elements or materials can be recovered, the amount of demolition waste (cross-reference the Recycling and Waste reporting table - refer to section 4.9 for further details), a schedule of practical and realistic providers who can act as brokers for each of the reclaimed items, and target reuse and reclamation rates. The Circular Economy Statement should include a Pioneering Bill of Materials which includes reused and recycled content by volume and mass. For reused and recycled content calculations should be submitted as accompanying supporting evidence.

It is recommended that in addition to submitting this information to the Council, pursuant to the requirements of part (c) of the condition you should also submit the post-construction assessment to the GLA at: ZeroCarbonPlanning@london.gov.uk

- 9 Signing up for flood warnings:

The Environment Agency advise to phone Floodline on 0345 988 1188 to register for a flood warning or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding - time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>., To get help during a flood, visit <https://www.gov.uk/help-during-flood>, For advice on what do after a flood, visit <https://www.gov.uk/after-flood>

- 10 The Met Police, Designing Out Crime Office recommends:
- The external gate leading into the barracks should be a tested and certified to a minimum of LPS1175 BR3; and
 - All external doors and windows beyond the above gate should be tested and certified to a minimum of PAS 24:2022.
- 11 Thames Water Advise:
- As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, 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/workingnear-our-pipes>
- Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at, the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 12 In respect of condition 16, when you apply to us for approval of details of hard and soft landscaping you must include:
- Details of replacement trees for all removed trees, which should be single stemmed, not multi-stemmed specimens; and
 - Section drawings of any new or replacement hard surfacing within tree RPAs, which should be 'no-dig' and permeable.

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.