

## 4. ALTERNATIVES

### INTRODUCTION

- 4.1 This chapter, prepared by Waterman Environmental in conjunction with the Applicant and the scheme architects, KPF, Benson and Forsyth, and Lynch Architects, describes key considerations and constraints influencing the layout, massing and design of the four Development Scenarios.
- 4.2 The four Development Scenarios comprise between three and five component buildings (depending on the Development Scenario) together with new areas of public realm. In line with the EIA Regulations, this chapter also outlines the main alternative design options for the sites of the four Development Scenarios which have been considered by the Applicant and scheme architects.

### CONSIDERATIONS AND CONSTRAINTS

- 4.3 Throughout the evolution of the proposals, a wide range of considerations and constraints have been identified which have influenced the final design and layout of the four Development Scenarios. The design team have therefore sought to respond to these factors whilst seeking to enhance the three application sites and their surroundings. Key considerations and constraints which have influenced the final design and layout of the four Development Scenarios are summarised in the following sections.
- 4.4 It is important to note that many of the specific considerations and constraints affecting the sites of the four Development Scenarios are encapsulated within Westminster City Council's (WCC's) Victoria Area Planning Brief (VAPB) (Ref. 4.1) (refer to Chapter 1: Introduction). As such, the VAPB has provided a general framework for the three application sites. WCC policy, as set out in the VAPB and confirmed through detailed consultation, supports the comprehensive redevelopment of the area north of Victoria Station to meet the identified need for mixed-use development in the Victoria area. Throughout the design process, the four Development Scenarios evolved to take into account these requirements.
- 4.5 Full appraisals of the Development Scenarios against national, regional and local planning policy (including the guidance set out in the VAPB) are provided in the Planning Statement submitted as a standalone document in support of the planning applications.

### Transportation and Access

- 4.6 Pedestrian permeability through the three application sites is considered essential to the success of all four Development Scenarios. This has been considered in the layout of the proposed buildings and public realm areas which in turn have been defined by existing identified pedestrian desire lines from Victoria Station to key pedestrian destinations in the vicinity of the three application sites such as Buckingham Palace and the Royal Parks to the north.
- 4.7 The three application sites have excellent links to a wide range of public transport facilities. Maintenance and enhancement of accessibility to these public transport facilities has been fundamental to the evolution of the Development Scenarios, particularly in allowing for various proposed alterations and improvements to the existing public transport infrastructure in the area, outwith the Applicant's proposals, including:
- TfL's Victoria Station Upgrade (VSU) proposals; and
  - The Chelsea-Hackney proposals, a safeguarded route for an underground railway running from southwest London to northeast London.

- 4.8 Additionally, the roads and pedestrian footways around the three application sites have been designed to accommodate the bus stops and layover spaces associated with any future dispersal of buses from Terminus Place, approximately 50m to the south of the sites of all four Development Scenarios. The road network surrounding the three application sites would therefore have the capability to accommodate all of the buses forecast to pass through or terminate at Terminus Place if future development by others is undertaken.
- 4.9 The design of the four Development Scenarios has ensured there would be sufficient capacity on the surrounding highway network to accommodate the trip generations created by each Development Scenario and consideration has also been given to minimising disruption generated by servicing vehicles. Further details are provided in Chapter 5: The Proposed Development Scenarios and Chapter 9: Transportation and Access.

#### Site Levels

- 4.10 Each of the application sites is generally flat with levels varying by no more than approximately 1.5m. However, levels have been considered in order to ensure inclusive access to and throughout all four Development Scenarios.

#### Surrounding Built Environment and Land Uses

- 4.11 The built form surrounding the three application sites is diverse in scale, massing and land use mix and this is reflected in the arrangement, massing and location of the proposed buildings within each of the Development Scenarios. For example, the proposed buildings have been appropriately scaled to take account of the surrounding structures, and the mix of land uses proposed as part of the Development Scenarios (i.e. residential, office, retail, etc.) has been designed to respond to the future needs of the Victoria area. This is described in more detail in the Alternatives section of this chapter below.

#### Townscape, Conservation and Visual Issues

- 4.12 The three application sites lie within the statutorily protected strategic viewing corridor from King Henry VIII's Mound, Richmond to St. Paul's Cathedral and several non-statutory but recognised important views. There are no existing features of built heritage value on any of the three application sites.
- 4.13 Built heritage features within the immediate vicinity of all three application sites include the Grade II listed Victoria Palace Theatre, adjacent to the south, and the Grade II listed Little Ben Clock, approximately 30m to the south. In addition, several conservation areas are present in close proximity to the three application sites, (including Westminster Cathedral Conservation Area, Grosvenor Garden Conservation Area and the Royal Parks Conservation Area). A comprehensive list of relevant built heritage features is provided in Chapter 3: Existing Land Uses and Activities.
- 4.14 The design of the four Development Scenarios has carefully considered maintaining and where possible improving the setting, character, quality and context of important long distance and local views, conservation areas and listed buildings.

More detailed discussions of the evolution of the building designs comprising each of the Development Scenarios are presented later in this chapter, with further details of the finalised designs provided in Chapter 5: The Proposed Development Scenarios. Volume 3: Townscape, Conservation and Visual Assessment, provides an assessment of the potential effects of the four Development Scenarios on various elements of the surrounding built environment and on key views in the area.

### Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

- 4.15 The dense urban massing of the four Development Scenarios and the range of surrounding sensitive receptors (refer to Chapter 3: Existing Land Uses and Activities) present potential constraints and sensitivities in terms of daylight, sunlight, overshadowing, light pollution and solar glare to properties and public spaces neighbouring the three application sites and to those proposed within the three application sites themselves.
- 4.16 The massing of the four Development Scenarios, together with the lighting proposals and façade treatments, has been carefully considered to minimise such effects as far as practically possible. However, it is acknowledged that some potentially adverse effects are inevitable within the urban context of the three application sites and their surrounds. Further details are provided in Chapter 16: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare.

### Wind Conditions

- 4.17 The suitability of the local wind environment has been considered in terms of the comfort levels required for particular pedestrian activities on and around the sites of the three application sites. This is of particular relevance to the significant provision of public realm space within all four Development Scenarios. Details are provided within Chapter 15: Wind Conditions.

### Air Quality

- 4.18 Due to vehicular traffic emissions, the three application sites form part of WCC's borough-wide Air Quality Management Area (AQMA).
- 4.19 Accordingly, the Applicant and the design team have given due consideration to ambient air quality through minimising the provision of car parking within each Development Scenario and improving accessibility to (and therefore the attractiveness and utilisation of) public transport. Since residential units would be provided as part of all four Development Scenarios (i.e. Buildings 5 and 7b/c within Development Scenarios 1 and 2, and Building 5 only within Development Scenarios 3 and 4), air quality has been considered at residential receptors at both ground and upper levels within and surrounding each application site. Further details are provided in Chapter 10: Air Quality.

### Noise and Vibration

- 4.20 In accordance with Planning Policy Guidance (PPG) 24: Planning and Noise (Ref. 4.2), the presence of a busy highway network and city centre activities surrounding the three application sites necessitate consideration of the appropriateness of the sites for residential dwellings. In addition, the proposed demolition and construction works, and the operation of the completed Development Scenarios, have been carefully assessed to ensure the satisfactory functioning of the Grade II listed Victoria Palace Theatre is maintained. Details are provided in Chapter 11: Noise and Vibration.
- 4.21 With respect to vibration, the presence of the Victoria, District and Circle London Underground Limited (LUL) underground lines beneath all of the three application sites has necessitated specific structural solutions to minimise the effects of ground-borne vibration. Details are provided in Chapter 5: The Proposed Development Scenarios and Chapter 11: Noise and Vibration.

### Below-Ground Structures, Ground Conditions and Contamination

- 4.22 The presence of the Victoria, District and Circle LUL underground lines beneath or in very close proximity to the three application sites has required the consideration of construction methods which would not affect the integrity of these services and their safeguarded limits. Land beneath the western part of the Application 1 site is safeguarded for the future Chelsea-Hackney Crossrail proposals and all four Development Scenarios would avoid this zone. Development Scenarios 1,

2 and 3 would include the construction of buildings directly above elements of the proposed VSU development while Development Scenario 4 would avoid this.

- 4.23 Chapter 5: The Proposed Development Scenarios provides an overview of the existing underground structures and explains how the design has responded to these constraints. Further details are provided within the standalone Design and Access Statements for each building submitted to support the planning applications.
- 4.24 The presence of potential contamination from previous site uses has required consideration with respect to appropriate intrusive construction methodologies to avoid further contamination risks and the potential need for remediation. Details are provided in Chapter 13: Ground Conditions and Contamination.

### Archaeology

- 4.25 The three application sites have the potential to contain archaeological resources, including palaeo-environmental deposits and post-Mediaeval remains. Whilst the four Development Scenarios propose excavation for the construction of a two-level basement, appropriate archaeological safeguarding and mitigation would form an integral part of the groundwork phases prior to construction of any of the Development Scenarios. Further details are provided in Chapter 12: Archaeology.

### Surface Water Drainage and Flood Risk

- 4.26 There are no surface watercourses or bodies on the three application sites and the nearest watercourse (the River Thames) is located approximately 1.2km south and east of the sites. However, with flood defences taken into account, the sites are located in an area of low flood risk. Nonetheless, all four Development Scenarios have been designed to consider the need to minimise surface water run-off and to safeguard against the potential effects of climate change.
- 4.27 Further details are provided in Chapter 5: The Proposed Development Scenarios and Chapter 14: Surface Water Drainage and Flood Risk.

### Ecology

- 4.28 The three application sites were subject to ecological surveys in 2007 as part of the EIA for the Applicant's previous proposals (known as VTI) at the application sites and beyond (refer to later in this chapter). These surveys concluded that the three application sites are currently of low ecological value, are not covered by any statutory or non-statutory nature conservation designations and are situated within an area containing few valued ecological receptors.
- 4.29 However, the Applicant is committed to the principles of sustainable development which encourage ecological enhancements and, accordingly, has included a number of such enhancements within the proposals for each of the four Development Scenarios. In addition to public realm spaces which would incorporate tree planting and green and brown roofs, bird boxes would be built into the fabric of the various buildings to encourage nesting, particularly for the protected black redstart (*Phoenicurus ochrurus*), sparrow (*Passer domesticus*) and swift (*Apus apus*) for all four Development Scenarios. Development Scenarios 1 and 3 would provide green walls as part of Building 6a (refer to Chapter 5: The Proposed Development Scenarios).

### Energy and Sustainability

- 4.30 All four Development Scenarios have been designed to respond to planning policy and guidance including the Mayor's sustainability requirements and Energy Hierarchy (i.e. 'be lean', 'be clean', 'be green') together with the Applicant's own corporate environmental targets and objectives. Full details are provided in the Energy Statement and Sustainability Statement which address each of the four Development Scenarios and have been submitted in support of the three planning applications. Such details are summarised in Chapter 5: The Proposed Development.

### Utilities

- 4.31 There are a number of existing services across all three application sites which pose physical constraints to the Development (refer to Figure 3.4), in particular:
- The King's Scholars' Pond Sewer (KSPS) running along a north-south axis directly under the Application 2 and 3 sites and within the eastern extremity of the Application 1 site;
  - The Western Deep Sewer running along an east-west axis north of Allington Street and north-south adjacent to the KSPS, within all three application sites; and
  - Several shallow sewers running along Terminus Place, Victoria Street, Buckingham Palace Road, Allington Street and Warwick Row, within the three application sites.
- 4.32 Utility constraints have been considered in the construction phasing to ensure minimal disruption to existing services. Existing sewers are currently working at capacity. The design of the four Development Scenarios has ensured that all existing utilities would be able to cope with the additional utility demand of the completed and operational Development Scenarios and has, as far as practicable, aimed to redistribute the foul and surface water using the available network in the most efficient way.

### ALTERNATIVES

- 4.33 Under the EIA Regulations (Ref. 4.3), an Environmental Statement (ES) is required to provide:
- "...an outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects".*
- The following sections therefore review, in general terms, the main alternatives to the Development Scenarios which have been considered by the Applicant.
- 4.34 It is important to note that the proposals have a considerable history and the strategy for proposing four Development Scenarios was not in existence until recent times. As such, the examination of alternatives initially considers the early proposals for all-encompassing, site-wide redevelopment and then the subsequent proposals for the four Development Scenarios, on a building by building basis.
- 4.35 The development of the proposed Development Scenarios commenced with a detailed review of the aims and objectives laid out in the VAPB together with the considerations and constraints which have been summarised earlier in this chapter. As the EIA progressed in parallel with the design process, iterations to design elements have been made to minimise potential environmental adverse effects which have been identified from baseline surveys and analyses.
- 4.36 The following sections describe the main alternatives which were considered by the Applicant, including:
- The 'do nothing' alternative (i.e. the situation at the three application sites if only routine building maintenance is undertaken);
  - The 'do minimum' alternative (i.e. accounting for the refurbishment of the existing buildings across the three application sites); and
  - Alternative designs.
- 4.37 The alternative designs considered here include only the alternative designs which were seriously considered by the Applicant. Inevitably there have been other tentative design suggestions which, for various reasons, were not progressed to a stage where they can truly be termed 'alternative designs'. In such circumstances it is not considered necessary to outline all tentative design suggestions.
- 4.38 As previously mentioned, the Development Scenarios have been designed to respond to the aspirations of the VAPB, TfL and LUL. As such, no alternative sites have been considered by the Applicant. Detailed information on the planning policy context of the Development Scenarios is provided in the Planning Statement submitted as a standalone document in support of the three planning applications.

### The 'Do Nothing' Alternative

- 4.39 Guidance on the preparation of EIA suggests that it is good practice to consider the evolution of a site in the absence of specific proposals, i.e. the 'do nothing' alternative.
- 4.40 As noted above, the 'do nothing' option refers to leaving the three application sites in their current state, undertaking only routine building maintenance. This option would result in a number of negative outcomes with a general worsening of the existing situation. Key issues are summarised below:

#### Commercial Development

- 4.41 Under the 'do nothing' alternative, the best possible use of the Sites' locational advantages would not be realised and the three application sites would not contribute towards the expected growth of London. In addition, if only routine maintenance was undertaken to the buildings across the three application sites the quality of assets would be likely to decline and potential occupiers would be likely to choose other buildings. Consequently, the reasonable expectation would be that rental values would decrease and building vacancy would increase.

#### Public Realm and Landscaping

- 4.42 The 'do nothing' alternative would fail to rectify the current lack of quality public realm (including pedestrian routes), or the existing on-street pedestrian crowding and conflict with vehicular traffic, which are currently major issues for the three application sites. Without redevelopment, the forecast increase in pedestrian traffic would worsen the existing situation leading to a further degradation of pedestrian amenity and safety. This is likely to significantly increase the number of accidents within the sites and discourage access to all modes of public transport. Overall, the objective to contribute to enhancing Victoria's status as a gateway location to the City of Westminster and the rest of London would not be achieved.

#### Transportation

- 4.43 All Development Scenarios facilitate the possible future relocation of the existing Terminus Place bus stops to the streets surrounding the three application sites. Without redevelopment, these proposals could not be realised and the existing Victoria Bus Station at Terminus Place would remain with very little capacity to accommodate planned increases in the range and frequency of bus services. This has the potential to discourage the use of public transport and would create a worsening on the already congested bus station at Terminus Place.
- 4.44 All four Development Scenarios would provide a possible route for the Paid Area Link (PAL) of the VSU proposals within the second basement level (further details are provided in Chapter 5: The Proposed Development Scenarios). This would provide direct access from the proposed new LUL northern ticket hall to the Victoria, District & Circle Line platforms and other ticket halls. There would be no direct access to any of the buildings within the four Development Scenarios via the PAL.

#### Ecology

- 4.45 Without the implementation of any of the four Development Scenarios, it would be highly unlikely that any improvements would be seen in terms of the natural ecological value or interest of the sites of the three application sites. The proposed ecological enhancements for all four Development Scenarios include increased tree planting, green and/or brown roofs and the provision of bird boxes. Development Scenarios 1 and 3 would provide green walls as part of Building 6a. Further details are provided within Chapter 5: The Proposed Development Scenarios.

### The 'Do Minimum' Alternative

- 4.46 In the 'do minimum' alternative the Applicant would refurbish its assets within the sites relevant to each Development Scenario, including:

- Allington Towers (17 Allington Street) (Development Scenarios 1, 2, 3 and 4);
- Allington House (150 Victoria Street) (Development Scenarios 1, 2, 3 and 4);
- 3-7 Bressenden Place (Development Scenarios 1 and 2);
- 9-11 Bressenden Place (Development Scenarios 1, 2, 3 and 4);
- Elliot House (10/12 Allington Street) (Development Scenarios 1, 2, 3 and 4);
- Lakeview Court (45-75 Buckingham Palace Road, 29-31 Bressenden Place) (Development Scenarios 1, 2, 3 and 4);
- The Stag Public House, Bressenden Place (Development Scenarios 1, 2, 3 and 4);
- 120/122/124 Victoria Street (Development Scenarios 1 and 2);
- 156/158 Victoria Street (Development Scenarios 1, 2, 3 and 4); and
- 1 Warwick Row (Development Scenarios 1, 2, 3 and 4).

The extent of refurbishment works would be subject to the commercial viability of undertaking such works.

- 4.47 Although refurbishment would be likely to improve rental values and vacancy rates, as with the 'do nothing' alternative, any potential wider commercial development, public realm, transport and ecology benefits would not be achieved. In addition, there would also be some disruption caused to existing occupants and users as a result of the refurbishment works.

### Alternative Designs

#### Bressenden Place Track 1 Scheme

- 4.48 Early in 2004 the Applicant developed proposals to redevelop its land holdings located north of Allington Street and to the east of the existing Grade II listed Victoria Palace Theatre on Victoria Street and Bressenden Place. The site boundary and a ground floor plan of this alternative are shown on Figure 4.1
- 4.49 The proposals involved the 'stopping-up' of Warwick Row and realignment of the eastern part of Allington Street behind the Grade II listed Victoria Palace Theatre. Three buildings were proposed:
- A residential building to the northwest of the site;
  - An office building to the northeast of the site facing the existing Portland House; and
  - A residential building to the east of the existing Grade II listed Victoria Palace Theatre.

The proposals included retail at ground level across all buildings.

- 4.50 This alternative provided a number of improvements in terms of commercial development and public realm to the north of Allington Street. However, it was felt that a larger-scale development would be more successful in improving pedestrian routes through the site, particularly routes connecting with Victoria Station, and in reducing the current conflict between pedestrians and road traffic routes.

#### Bressenden Place Track 3 Scheme

- 4.51 Following consultation with WCC, in order to provide the wider public transport interchange, public realm and commercial development benefits, the Applicant undertook work to develop the Bressenden Place Track 3 Scheme. As shown on Figure 4.2, this scheme comprised a site bounded by the Grade II listed Victoria Station, Buckingham Palace Road, Bressenden Place, Victoria Street and Wilton Road. In this scheme the Grade II listed Victoria Palace Theatre and the Duke of York Public House were retained and integrated into the scheme. The Grade II listed Little Ben Clock was proposed to be relocated. The scheme excluded improvements to the District and Circle Line, but facilitated the proposed VSU works.
- 4.52 A number of possibilities were contemplated culminating in a scheme which primarily focused around locating a bus station on the site which was able to meet future TfL predicted growth in

bus numbers. This scheme, in different variants, considered locating the bus station at grade in various positions across the site and below grade to the north of a realigned Victoria Street. Closure of Victoria Street was also considered.

- 4.53 Locating a bus station at grade, sized to meet future bus demand, was rejected on the basis of the required land take and consequent impact on commercial viability of the scheme and public realm space.

#### **March 2006 Masterplan Scheme**

- 4.54 In March 2006 the Applicant presented a masterplan proposal to WCC for consideration. As illustrated in Figure 4.3, the masterplan scheme proposed:

- A below grade bus station to the north of Victoria Street which would have the capacity to contain 40% of the terminating or passing bus services at Victoria;
- A re-graded and relocated Victoria Street to accommodate the below grade bus station;
- A total of seven buildings located around two major pedestrian routes leading towards the northwest and the east of the Site;
- Three buildings over 125m AOD. The two tallest buildings would comprise residential uses. The lower of the three taller buildings would comprise office accommodation;
- The creation of two new public spaces, one in front of the Grade II Listed Victoria Station and the other, a large square, to the north of Victoria Street; and
- The incorporation of LUL's VSU proposals.

The Masterplan scheme did not provide any parking, affordable housing or upgrading works to the District and Circle lines.

- 4.55 Whilst WCC accepted the non-provision of parking and affordable housing, concern was raised in respect of the provision of three tall buildings. In addition, in March 2006, WCC published their VAPB. This set out design criteria for development in the Victoria area and (amongst other issues) provided guidance in relation to building heights. Specifically, Figure 3 of the VAPB (refer to Figure 4.4 of this ES) indicated guidelines for storey heights for the Site and the possibility of one taller building (over 12 stories) in one of two locations: on Bressenden Place or on Terminus Place. The provision of one tall building on the site was considered in the context of the existing tall building at Portland House remaining.

- 4.56 Locating a bus station below grade with access and egress ramps off Buckingham Palace Road was rejected by TfL over operational impacts such as increased journey time and 'dead' bus mileage.

#### **August 2007 Victoria Transport Interchange Scheme**

- 4.57 Following the March 2006 Masterplan Scheme and in response to the newly published VAPB, revised proposals known as Victoria Transport Interchange (VTI) scheme emerged through implementation and/or consideration of the following.

- 4.58 Jointly with TfL, the decision to relocate buses from Terminus Place to surrounding streets was made on the basis that:

- Bus stops could be located in groups that were determined by the direction that buses travel. This would allow for better pedestrian orientation;
- Routes to bus stops would be clearly defined, along safe active frontages; and
- Future predicted increase in bus passengers to 2021 could be satisfied.

- 4.59 In addition, the scheme allowed for funding of the District and Circle Line improvements. Thus, the proposed works to the District and Circle Line alongside VSU and the relocated buses provided a fully integrated transport interchange at Victoria.

- 4.60 In order to ascertain the massing of the scheme, further design was undertaken in accordance with the guidance set out in the VAPB. In this respect, analysis of the effects of one taller building

at the site was undertaken. The effect of the single taller building on either Bressenden Place or Terminus Place was studied in conjunction with the existing Portland House (a 1960s office building of 30 floors (106m AOD) owned by the Applicant). An analysis of views from around the site demonstrated that it would be preferable to include Portland House in the scheme area and look at its demolition and replacement by a lower building. This was considered feasible as the existing Portland House requires considerable refurbishment works to extend its operational life and is well known to be not well liked by various members of the community. Two new taller residential buildings were proposed directly to the north and south of Victoria Street.

- 4.61 The above considerations resulted in an initial masterplan scheme being formulated, comprising the following
- Buses and bus stops relocated to the surrounding streets with appropriate signage along high quality routes;
  - A regraded Victoria Street which remained in its existing plan position;
  - The replacement of Portland House;
  - A total of seven buildings located around the two major pedestrian routes to the northwest and the east. This included two tall residential buildings; a building located to the south of Victoria Street at 163.5m AOD; and a building to the north of Victoria Street at 143m AOD;
  - The creation of two new public spaces, one in front of the Grade II listed Victoria Station; the other, a large square, to the north of Victoria Street;
  - The incorporation of LUL's VSU proposals;
  - The upgrade works to the District and Circle Line incorporating better access to the Victoria Line from the District and Circle LUL line, wider platforms and full Mobility Impaired Persons (MIP) access; and
  - Below ground retail space in lieu of a below grade bus station linking to the District and Circle Line.
- 4.62 With the exception of disabled car parking, no additional on-site car parking was proposed. Affordable housing was not proposed because of the level of costs incurred in relation to the transport improvements to be delivered by this scheme, in line with the VAPB.
- 4.63 Following a series of pre-application meetings with WCC, consultation with various third party consultees and two public exhibitions, the scheme was further amended to incorporate comments that related to the proposed height and massing. In this respect, further detailed analysis of the visual effects of the proposed residential tower was undertaken. This focused on the effect of the proposals on the Westminster Palace, Westminster Abbey and Saint Margaret's Church World Heritage Site.
- 4.64 The further visual analysis was based on fixed point verified visual images and verified moving views. This showed that the proposals were visible from the Albert Embankment when moving towards Lambeth Bridge. The visibility of the taller of the two buildings was exacerbated by the requirement of a fixed red aviation light as the building was over 150m AOD.
- 4.65 As a result of this analysis and through discussions with WCC officers it was decided to lower both of the residential buildings to 133.65m AOD. This height was chosen as it represented the point at which neither building was visible above the World Heritage Site from the Albert Embankment.
- 4.66 In responding to the above, the scheme evolved into the VTI scheme. Furthermore, following consultation and concerns expressed by local residents over pressure on existing local car parking a decision was made to incorporate car parking into the scheme and to allocate some spaces in the existing Cardinal Place development for use by the proposed VTI scheme. In addition, in response to local residents' comments a cinema was incorporated into the scheme. Finally, the VTI scheme (as shown in Figure 4.5) was submitted to WCC for planning approval in August 2007. The VTI planning application has not been subject to further amendment and remains an extant application.

**Victoria Transport Interchange 2**

- 4.67 Receipt of responses from statutory consultees on the August 2007 VTI scheme led to further evolution of the proposals. The Greater London Authority (GLA) reported on the VTI proposals in November 2007, stating that the principle of the development was supported, subject to continuing discussion with the Applicant to resolve a number of outstanding issues.
- 4.68 In December 2007, following an extensive round of consultation, including an eight week period of public consultation, WCC's Planning and City Development Committee reported on the August 2007 VTI proposals. The Committee Report set out the perceived opportunities and benefits of the scheme together with the principal negative aspects when assessed against the VAPB and relevant Unitary Development Plan (UDP) policies.
- 4.69 Table 4.1 presents a summary of the resolutions made by the members of the WCC Planning and City Development Committee in December 2007 on the VTI proposals. These resolutions were the culmination of WCC's assessment of the proposals and their analysis of all of the consultation responses. Table 4.1 also summarises how the Applicant and the design team have subsequently responded to the resolutions.

**Table 4.1: WCC Resolutions on August 2007 VTI Scheme and the Subsequent Design Response of the Applicant and Design Team**

<b>WCC Resolutions on the August 2007 VTI Scheme</b>	<b>Design Response Giving Rise to VTI 2 Scheme</b>
1. A comprehensive approach to the redevelopment of the site was welcomed. It was recognised that the solution represented the best opportunity to achieve the complex aspirations set out in WCC's VAPB.	Continued efforts were made to achieve the complex aspirations of the VAPB.
2. The physical regeneration effects of the intended investment in the Victoria area were considered highly significant. These were welcomed.	Continued efforts were made to achieve similar wide-scale regeneration effects.
3. Subject to further detailed feasibility analysis, the improvements to the District and Circle Line, together with the reconfiguration of the existing bus terminal at Terminus Place were considered to be capable of meeting the VAPB's requirements.	Although the District and Circle Line improvements are not part of VTI 2, the Applicant and design team have worked hard to facilitate the future relocation of the bus terminal at Terminus Place by providing space for bus stops on Victoria Street, Buckingham Palace Road and Bressenden Place as part of VTI2.

WCC Resolutions on the August 2007 VTI Scheme	Design Response Giving Rise to VTI 2 Scheme
<p>4. Notwithstanding point 3 above, WCC noted that the August 2007 VTI scheme did not demonstrate the potential of the scheme as an exemplary transport interchange. In this respect, WCC did not accept that the transport benefits proposed would be enough to mitigate for a shortfall in affordable housing, community benefits and residential parking provision.</p>	<p>Within application 2 (Development Scenarios 1 and 2), 24.5% of dwellings would be affordable. Whilst this falls short of the 30% of dwellings which would normally be required under WCC’s UDP Policy H4, the VAPB states it is permissible for the transport benefits of a development to offset the requirement to provide affordable housing under certain circumstances.</p> <p>Within applications 1 and 3 (Development Scenarios 3 and 4) there would, be no on-site provision of affordable housing. However, the Applicant is committed to providing an alternative provision for affordable housing either on an alternative site or through a financial contribution. It is anticipated that such provision would be secured under a Section 106 agreement (refer to Chapter 8: Socio-Economics).</p> <p>Application 2 (Development Scenarios 1 and 2) would include an option of a library over four levels within Building 7b/c and the general improvement of the public realm in the area (within all four Development Scenarios).</p> <p>A total of 111 basement level residential car parking spaces would be provided. These would be split between the basement proposed as part of Application 1 and the main basement of the adjacent Cardinal Place development. These spaces would be provided as part of all four Development Scenarios.</p> <p>Further details can be obtained by reference to Chapter 5: The Proposed Development Scenarios and Chapter 9: Transportation and Access.</p>
<p>5. The massing, height and scale of the August 2007 VTI scheme was deemed to have a detrimental effect on views identified as important in adopted and emerging policies including the London Views Management Framework .</p>	<p>The number of buildings proposed has been reduced and the overall height and massing of each of the buildings have been significantly reduced. In particular, Building 7a (within all four Development Scenarios) has been reduced in height from approximately 133m AOD to approximately 90m AOD.</p> <p>Further details are provided in the bullet points below. Further reference should also be made to Chapter 5: The Proposed Development Scenarios and Volume 3: Townscape, Conservation and Visual Assessment for more details.</p>
<p>6. Notwithstanding point 5 above, WCC commented that the architecture of each building was capable of being resolved to a high standard. However, WCC requested that further consideration be given to the treatment of lower floors at the transition to the public realm.</p>	<p>The architecture of each of the proposed buildings has been developed to take account of WCC’s comments regarding the treatment of lower floors and the interaction with areas of public realm.</p> <p>For example, a north-south route would be created between Building 5 and Buildings 6b and 7a (within all four Development Scenarios). This would be a covered pedestrian route, 17m wide, 150m long and 10m high. Both sides would support active retail frontages at ground and first floor levels and benches, kiosks and a water feature would be provided.</p> <p>Additionally, application 3 (Development Scenarios 1 and 3) would deliver a new area of public realm under the raised soffit of Building 6a, with seating areas for pedestrians.</p> <p>Full details are available within the Design Statements for each of the buildings and summaries of proposed public realm areas and building materials are provided within Chapter 5: The Proposed Development Scenarios.</p>

WCC Resolutions on the August 2007 VTI Scheme	Design Response Giving Rise to VTI 2 Scheme
<p>7. The proposed improvements to the public realm were considered significant but not fully convincing. In particular, WCC noted that the public realm was constrained by the height, scale and footprint of the proposed Building 2. Overall, and contrary to the requirements of the VAPB, WCC concluded that pedestrian priority was not given the highest priority.</p>	<p>Building 2 is no longer included within the proposals. As noted above, substantial public realm improvements would be delivered as part of all four Development Scenarios and would be concentrated around a north-south pedestrian route to the east of Building 5 and an east-west route between Buildings 6b and 7a. Additionally, Development Scenarios 1 and 3 would provide an area of public realm under the raised soffit of Building 6a. The massing and heights of each of the proposed buildings has been significantly reduced compared to the VTI scheme. Further details are provided within Chapter 5: The Proposed Development Scenarios.</p>
<p>8. WCC requested the need for a package of community facilities located on site to be delivered. Alternatively, commuted sums were requested.</p>	<p>As noted above, application 2 (Development Scenarios 1 and 2) would provide the option of a significant community benefit in the form of a library within Building 7b/c. All four Development Scenarios would ensure that the required ratio of 10m<sup>2</sup> of play space per child would be created. Further details can be obtained by reference to Chapter 5: The Proposed Development Scenarios and Chapter 8: Socio-Economics.</p>
<p>9. Subject to point 8 above, WCC accepted that the broad approach to new land uses was considered acceptable. However, further thought should be given to the retention of a hotel use on the site.</p>	<p>VTI 2 does not provide any hotel use. There are a number of hotels in the vicinity of the application sites and the Applicant is confident that the proposed combination of land-uses would provide the optimum mix.</p>

The WCC Planning and City Development Committee stated that it was particularly keen to ensure that substantial reductions in the height and massing of certain buildings within the August 2007 VTI scheme were made, irrespective of any resolution of the transport and public realm issues. In particular the WCC Committee concluded that whilst some height variances to those prescribed in the VAPB could be justified, the following actions should be taken:

- No part of the scheme should be visible over the roofline of the Palace of Westminster or Westminster Abbey or above the tree line as viewed from St Thomas’s Hospital and Westminster Bridge;
- No part of the scheme should breach the threshold plane of the viewing corridor in the protected linear view from King Henry’s Mound in Richmond Park to St Paul’s Cathedral;
- The setting of the Grade II\* listed Grosvenor Thistle Hotel and Grade II listed Victoria Railway Station in views north and south on Buckingham Palace Road should be protected by drawing Buildings 4 and 5 back to the established building line and reducing the height of both so as to ensure that the current level of visibility of the hotel and station is maintained;
- The settings of the Victoria Memorial and Buckingham Palace should be protected through the substantial reduction in height and massing of Building 6 to achieve a less monolithic and more elegant series of distinct forms;
- The heights of Buildings 4 and 5 should be reduced to mitigate the impact on views from Victoria Square; and
- The sheer height of the south facade of Building 4 should be reduced and its footprint set back to increase the space between the Grade II\* listed Grosvenor Thistle Hotel and Grade II listed Victoria Railway Station canopy.

- 4.70 Consideration of the issues outlined in Table 4.1, and in the bullet points listed above has led to the design, configuration and proposed uses of the individual buildings being altered in various ways since the submission of the August 2007 VTI proposals. For example, Building 5 now has a much narrower footprint than the previous design iteration, reflecting the need for a narrower block depth in residential units as opposed to office functions. This addresses WCC's requirements for the massing of Building 5 to be reduced and also satisfies the need to provide adequate daylight for residents, allow the potential for natural ventilation, and establish unit sizes of appropriate proportions in terms of the overall area of each unit, as well as satisfying the critical dimensions of key living spaces.
- 4.71 In addition to the above, the design and uses of Building 7b/c have altered significantly since the submission of the original VTI proposals. Changes to design and use have principally occurred as a result of the consultation responses from GLA and WCC which identified the need for provision of on-site affordable housing and community facilities.
- 4.72 It should be noted that Building 4 does not form part of the VTI 2 proposals.
- 4.73 More detailed descriptions of each building within the VTI 2 proposals are provided in Chapter 5: The Proposed Development Scenarios and within the Design and Access Statements for each building, together with the Masterplan Statement for the sites of the four Development Scenarios considered together.
- 4.74 It is also important to note that there have been continued discussions with LUL throughout the design process for VTI 2 regarding their proposals for the VSU. Due to the close proximity of the two schemes, in the event that the VSU proposals gain planning consent and the development proceeds, this would be likely to affect the timing of the delivery of parts of the overall VTI 2 proposals, particularly Buildings 6a and 7b/c as these above-ground structures would sit above the proposed below-ground VSU elements.
- 4.75 Accordingly, a planning strategy has been devised in order to facilitate the delivery of VTI 2 without it being impeded by the VSU proposals. As such, and as described within Chapter 1: Introduction and Chapter 5: The Proposed Development Scenarios, it has been agreed with WCC to submit three planning applications at the same time for different elements of the overall VTI 2 proposals.
- 4.76 The main area of basement within the VTI 2 proposals would be located beneath Buildings 5, 6b and 7a and would, therefore, not physically impinge on the VSU site boundary. Furthermore, as noted above, an option exists to provide, as part of the VTI 2 development, a 'Paid Area Link' (PAL) which would provide a pedestrian link within the VTI 2 basement levels (in all four Development Scenarios) connecting the planned VSU northern ticket hall with existing ticket halls and platforms. The small area of basement proposed beneath Building 7b/c would not impinge on the VSU proposals.
- 4.77 The Applicant fully intends to deliver Development Scenario 1. However, the VSU proposals have the potential to affect the timing and delivery of parts of Development Scenario 1. As such, Development Scenarios 2, 3 and 4 are contemplated as viable alternatives in the event that Development Scenario 1 cannot be implemented due to a conflict with the VSU proposals.

#### SUMMARY AND CONCLUSIONS

- 4.78 The proposed Development Scenarios have evolved over a number of design iterations, responding to the planning and development aspirations of WCC and taking account of the Applicant's development objectives, design aspirations and prevailing environmental constraints. The evolution of the Development Scenarios has therefore responded to numerous design and environmental issues as described above.

The resultant VTI 2 proposals (which could be implemented through four different Development Scenarios) are therefore considered to offer the most advantageous design solution, following a series of design iterations. In particular, key considerations can be summarised as follows:

- Careful consideration of the setting, character, quality and context of important long distance and local views, conservation areas and listed buildings;
- Appropriate locations of the sites for residential dwellings in terms of potential adverse noise and vibration effects;
- Accommodation of the proposed buildings with LUL's VSU scheme and existing buried utilities infrastructure across the three application sites;
- Buildings designed to respond to energy and sustainability planning policy and guidance including the Mayor's sustainability requirements and Energy Hierarchy;
- Improve pedestrian permeability and links to key transportation nodes within Victoria;
- Provide sufficient amounts of affordable housing units (within Development Scenarios 1 and 2) or provide alternative provision for affordable housing either on an alternative site or through a financial contribution (for Development Scenarios 3 and 4);
- Provide services to the wider community within the City of Westminster;
- Safeguard possible improvements to local public transport infrastructure; and
- Respect the settings of existing structures of built heritage significance in the vicinity of the three application sites.