

VICTORIA STATION UPGRADE (VSU)

**TRANSPORT AND WORKS ACT 1992
TOWN AND COUNTRY PLANNING ACT 1990**

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

CATHEDRAL AREA RESIDENTS' GROUP

STATEMENT OF CASE

Summary

1. The Statement presents the credentials of the Cathedral Area Residents' Group (CARG) and identifies the characteristics of the residential Cathedral Conservation Area which adjoins the site of the VSU. The mansion blocks and trees form a protecting 'skirt' of non-commercial activity around the historic grade 1 listed Cathedral. This is the ecclesiastical and working centre of the Roman Catholic Church for England and Wales – the complex includes both housing (for the Cardinal) and central administrative offices.
2. Given the extent and duration of the works during construction phase, and that the application evidences environmental impacts to a greater or lesser degree on many blocks, CARG contends that insufficient attention has been paid by the applicant to consultations with residents. Where these have occurred, they have been limited to superficial 'information giving' sessions only.
3. To date, the applicant has given no indication of either special mitigating measures for the Cathedral area in general, or for specific blocks in particular. Aside from those specific impacts CARG has concerns that arrangements for traffic, buses and taxis are insufficiently worked through and measures for pedestrians, particularly at crossings are inadequate. The overall result could be a loss of connectivity for Cathedral Area residents with central Victoria.
4. Given the duration of the works, the extent of the impact (including traffic) and likely contemporaneous redevelopment of other parts of Victoria Street, CARG is concerned for the medium-term (i.e. until 2015) viability of this historic but fragile residential quarter.
5. CARG considers it essential that residents are involved in the production of the Traffic Management Plans and that traffic impacts as a whole on the Conservation Area are considered in a Conservation Area Protection Plan. CARG also has concerns that WCC protect the interests of the area in its negotiations with the applicant on a suitable CCP.

1. INTRODUCTION

1.1. The Cathedral Area Residents Group (CARG) was formed in May 2007 as an umbrella amenity group whose members are residents' associations and residents' management organisations within the City of Westminster Cathedral Conservation Area. CARG's aims as set out in its Constitution are:

1. To promote fellowship and dialogue between residents living in the Cathedral Conservation Area and also between their respective residents' associations,
2. To facilitate co-operation in matters of common interest,
3. To improve the environmental quality and amenity of the locality for residents,
4. To be the representative body in discussions with local and other agencies (e.g. Westminster City Council, Transport for London) on matters which have a bearing on the quality of life for residents and to make formal representations to local or other agencies as necessary,
5. To work with other organisations (e.g. Westminster Cathedral), including local societies (e.g. the Westminster Society) and businesses with an interest in the local environment and amenity.

1.2. At present CARG has 12 full member organisations and 1 affiliate member organisation and these are set out in Appendix 1.

1.3. Whilst many residents' associations and residents' management organisations had been working in the area for a number of years, it began to become apparent that without an umbrella group representing residents as a whole, the Cathedral Conservation Area could become degraded and cease to function as a viable place to live and have a family life. The pressures upon the area come not only from a desire to upgrade the transport infrastructure but to intensify the use of the area as a place to work and shop and also to be the focus for the provision of many social and housing services (public and voluntary) designed to meet the needs of the homeless, street users and the transient population of migrants who start their experience of Britain at Victoria Coach Station.

1.4. CARG is a member of the Victoria Interchange Group (VIG). VIG has also objected to the application and CARG fully endorses that objection. Many of CARG's member associations will have also objected to the application in their own right because of their own particular circumstances. CARG supports those organisations and in this Statement it will highlight particular concerns whilst dealing with issues which face residents as a community.

1.5. It is understood that the application for the Order was submitted to the Secretary of State for Transport on 22 November 2007. CARG submitted objections to the application on 16 January and on 31 January 2008 following a meeting of CARG representatives on 29 January 2008. This Statement of

Case has been circulated to the CARG representatives for their approval prior to its submission.

2. THE CATHEDRAL CONSERVATION AREA

2.1. Westminster City Council has recently undertaken a Conservation Area Audit of the Cathedral Conservation Area and produced a consultation draft as part of its statutory duty to review the character and boundaries of its conservation areas. It is understood that formal public consultation will begin in April 2008. In summarising the character of the Conservation Area the document states (*page 14, para 4.2*) "The area around the cathedral retains a surprisingly peaceful and predominantly residential character. This area is characterised by a range of large scale high-quality mansion blocks, most in red brick. These are also interspersed with some interesting examples of social housing and hostels, as well as some warehouses to the northwest, many now converted to office use. The materials and details of the townscape here have considerable affinity with the architecture of the cathedral itself."

2.2. The Conservation Area also contains some landmark buildings such as Westminster Cathedral and its auxiliary buildings and which are Listed Grade 1. There are also a considerable number of Unlisted Buildings of Merit (*page 32, 33 and Fig. 59*) which add to the character and quality of the local area and some of which have local historic and cultural associations, including the residential mansions blocks and The Passage (Convent of St Vincent de Paul) on Carlisle Place.

2.3. Chapter 6 (*page 45*) of the consultation draft Audit describes the characteristic land uses of the Conservation Area. The area has a mixed use with ecclesiastical and public use at its heart. "It still retains its predominantly residential character, with a significant residential population in the many large mansion blocks." (*para 6.3*).

2.4. This is why CARG and its member associations refer to the Conservation Area being the "Residential Quarter" with almost 7,000 people on the electoral register for the Vincent Square ward and showing a year on year rise over the past 3 years (*Westminster City Council Facts & Figures 2007/8*).

3. CONSULTATION

3.1. The Report on Consultation (ROC) defines a consultation area at Appendix A by way of a plan. That plan excludes a number of significant residential areas and community facilities including Ashley Gardens, Ambrosden Avenue, Emery Hill Street and Thirleby Road and Westminster Cathedral Choir School despite those properties being included in the environmental assessment (*section 6.13*) as potentially experiencing negative impacts during the construction phase of the scheme. As such they were not party to the consultation activity described in section 4 of the ROC and as such have not had the same opportunity to participate in the development of

the scheme. Similarly, those residents acknowledged to be more significantly affected, namely Evelyn Mansions, Carlisle Place, Cardinal Mansions, Carlisle Place and Carlisle Mansions, Carlisle Place, have only recently (post application) been given the opportunity to discuss their concerns directly with the applicant in one-to-one meetings once these have been requested by residents. Prior to the application being submitted, it is believed that only Evelyn Mansions were given an "information session" by LUL. VIG were given a presentation on the main elements of the scheme in June 2006 but this did not cover issues such as construction impacts and traffic diversions. The consultation in respect of the application has therefore fallen short of what is expected and needed for a group that will be affected on a 24/7 basis over the seven year construction period.

3.2. Department for Transport guidance (*A Guide to TWA Procedures, 2006*) is clear that, "failure to carry out adequate consultation or to take into account issues or concerns raised increases the risk of the TWA application not succeeding. At the very least, inadequate consultation is likely to result in a greater number of objections and hence a more drawn out process before the application is determined." It is understood that over half of the objections received to the application come from residents' associations and CARG believe this to be not only indicative of the level of concern that residents have but also to ensure that they have the opportunity to make those concerns known and to have the opportunity to examine the applicant's case and to ascertain precisely what they are going to experience in their daily lives over the construction period and once the scheme is operational.

3.3. What has occurred is unfortunate and has not helped non-professionals in the understanding of the application but it is largely water-under-the-bridge as the application is made. It does however indicate that the applicant has given insufficient consideration to the impact of the scheme on the Residential Quarter and the Cathedral Conservation Area and/or has not considered that residents are important stakeholders in the scheme. CARG will be seeking to have these concerns addressed at the public inquiry although it hopes that the application will now take the opportunity to engage fully with residents.

4. IMPACTS ON THE RESIDENTIAL QUARTER

4.1. The main assessment of the effects on the community is found in section 6.13 of the Environmental Statement (ES) (page 6.83). Two of the Key Residential Areas are within the Residential Quarter: "Vauxhall Bridge Road to Ambrosden Avenue Zone" and "Ambrosden Avenue to Howick Place Zone" (table 6-17) as are a number of Principal Community Facilities: St Vincent de Paul Primary School, Westminster Cathedral Choir School, Westminster Cathedral, Convent of St Vincent de Paul (table 6-15). Residents are also considered to be Community Receptors with the issue of access routes between residential areas and the Victoria Interchange and routes between residential areas and community facilities being highlighted (table 6-14).

4.2. The conclusion for the construction phase is that "these residual negative effects are not considered significant for the community" (para 6.13.19) and in terms of the scheme's operation that any positive residual indirect effects on the community are not significant (para. 6.13.23). It is CARG's belief however that there are significant negative effects on the community over a considerable period of time (2009 -2015) and that these are not balanced out by any appreciable positive effect of the scheme in the long term.

4.3. The indirect effects are identified in the areas of traffic and transport, air quality, noise and townscape. It is also acknowledged in the ES that the local community are the ones who will generally experience combined effects from the scheme (para 7.2.3). In the following paragraph however it goes on to state that in central London it is difficult to define specific communities and that specific communities cannot be identified. CARG would strongly resist such a claim which further emphasises the problems caused by lack of meaningful for consultation or engagement. It also gives rise to doubts over the findings of the ES in respect of the community and how conclusions could have been drawn from them. The Residential Quarter is a central London community and the existence of CARG, its membership and concerns as evidenced, for example, in its representations on the VSU and VTI planning applications, negotiations with the City Council on the Piazza Action Plan, all show that a local community does exist and the detailed nature of this Statement of Case is a means by which this is also evidenced.

Traffic – Pedestrian Movement

4.4. For the purposes of modelling pedestrian movements it is unclear whether the Mayor's political target for a significant increase in bus frequencies has been factored-in and if so, what additional strain the increase will place upon the road system at Victoria during each phase of the construction. Unless 'the bus question' is resolved between TfL bus managers and TfL road managers properly and the application genuinely reflects agreed solutions, Victoria will be gridlocked, bus routes severely compromised and pedestrians caught in the middle. In any event a real difficulty for local residents will be a loss of 'pedestrian connectivity' with central Victoria and even shorter pedestrian crossing times across some local trunk roads. Notwithstanding there are some mitigating measures (such as two new crossings), plans for maintaining connectivity during construction are insufficiently worked through (para 17.11 p.118 T.A. Vol 1) and even muddled. Especially unconvincing is the notion that lengthening walk times at some crossings (e.g. at crossing 5, Wilton Road) is useful without lengthening them also at corresponding crossings on the same route (e.g. crossing 4 at Vauxhall Bridge north). These 'plans' have also been drawn up whilst the important LEGION modelling results are still awaited.

4.5. Pedestrian crossing times are set to shorten during the construction phase (pps 113-115), worsening already awkward conditions for local residents (pps 113-115). Whilst the age profile of residents is not identified specifically for the Cathedral Conservation Area, the ES (Table 6-13 p.6-79)

identifies 22.5% of those living within the Assessment Area as aged 56 yrs and over. This is higher than the average for the rest of London and it is likely the proportion of over 56 yrs-olds in the population living within the Conservation Area boundary is very much higher still. The 2007 parent survey for the local primary school (St Vincent de Paul) School Travel Plan, evidenced short crossing times as a major obstacle to parents allowing their children to walk to school and identified the need for longer green man walk times during morning/evening school peaks - particularly across the Vauxhall Bridge Road and across Victoria Street from Bressenden Place. Although this is not mentioned in the documentation, school children and significant numbers of local residents probably need 2.48 seconds to assess the situation at a crossing and a further 20 seconds to cross comfortably. Existing Design Walk Speeds at crossings locally are therefore wrong for these pedestrians (*p.111 para 17.6 T.A. Vol 1* showing crossing times), likewise the frequency of green walk times, TfL having always privileged road traffic, particularly on the toll-free route. This has a disproportionate impact on residents who must use crossings every day (and quite usually several times a day) to go about their business. In addition to the sheer inconvenience, the chances of locals being involved in an accident must be greater than for commuters (43,000) who work in the area.

4.6. Whilst the introduction of two new permanent crossings to coincide with the start of the construction programme (Victoria Arcade across to Victoria Street north and pelican crossing on Victoria Street east of Bressenden Place, Cardinal Walk) is welcome and we accept these are well positioned, we are concerned at the perilously short walk times (10 seconds in both cases). Likewise any shortening for any period at either Vauxhall Bridge north (crossing 3) or the crossing at Wilton Road/Vauxhall Bridge North (*crossing 4, p.111 T.A. Vol 1*) already notorious for being very congested and demanding almost a jogging speed to cross safely (currently 12 seconds). Notwithstanding that the documentation does contain errors and contradictions it is clear that the overriding need is deemed to be 'keep the traffic moving' at each stage of the construction process (see for example *para 17.8 p.115 T.A. Vol 1 where up to 50% reductions are wanted in pedestrian green times at the Bressenden Place corner site crossings since "...the maximum possible time (is) needed for south bound traffic from this approach" and "...pedestrians will have to be directed to cross the south side of Victoria Street instead as more pedestrian green time is available there"*). There is an obvious contradiction in creating new crossings which encourage pedestrians to cross north (from Victoria Arcade) toward Bressenden corner which then cannot cope with them.

4.7. The difficulties caused by this approach and the disproportionate impact on residents means that as well as Traffic Management Plans (*Code of Construction Practice, section 2.4*), Pedestrian Management Plans should be prepared which consider the needs of residents as well as commuters and other users of Victoria, such as theatre-goers.

Traffic – Vehicular and Construction

4.8. We are concerned that during the lengthy period of diversions for utility works (pre application decision) and for the constructions works, residents will be severely disadvantaged as they will not be able to choose alternative routes to avoid the Victoria area. The VIG Statement of Case, paras 7.6 and 7.7 go into greater detail on these points and CARG endorses the views expressed. As well as delay, residents may be subject to the streets within the Residential Quarter becoming "rat runs" as cars and taxis try to avoid the disruption and diversions on the major roads or used by construction traffic. It is noted that the impact of construction traffic has not yet been included in the traffic planning as routes are not yet known. What can be said however is that construction traffic will further add to the disruption that the Victoria area will experience. This is not an acceptable situation especially when combined with the other environmental impacts that will be suffered.

4.9. It is also noted that there appears to have been no assessment made of the needs and impact of Westminster Cathedral in terms of traffic generation both for its ceremonial events and for the many visitors and worshippers who arrive at the Cathedral by coach. Coaches currently park on Ambrosden Avenue and/or drop-off on Victoria Street.

4.10. This is why it will be important to include residents in the production to the Traffic Management Plans and to consider traffic impacts as a whole on the Conservation Area in a Conservation Area Protection Plan (see section 5 below).

Air Quality

4.10. Two Key Residential Zones and Principal Community Facilities that are within the Residential Quarter are identified as possibly experiencing some deterioration in air quality as well as potential dust nuisance (*para 6.4.24 and Fig 6.4(1)*). Although it is unclear why Westminster Cathedral itself is not in the list at *para 6.4.23* and why a 200m radius zone has been assessed rather than a more practical approach based on building and road layout which does not cut through buildings e.g. Westminster Cathedral, Morpeth Mansions, Ashley Gardens (Ambrosden Avenue and Thirleby Rd), Carlisle Mansions and Cardinal Mansions, Carlisle Place, are all dissected by the zone.

4.11. The ES concludes that the use of mitigation methods will mean that there will be no significant residual effects from construction dust (*para 6.4.47*).

4.12. This is not however the experience of residents as a result of recent construction activity in the locality (Cardinal Place, Howick Place Sorting Office, demolition of Vauxhall Bridge Rd/Wilton Road corner site, City of Westminster School site) which regularly causes dust to be blown in through windows and doors (closed) and accumulate in light wells and back alleys

which are a characteristic of the age and design of the properties. Cars are also regularly coated with dust, as are windows and sills.

4.13. Dust impacts over a 7 year construction period will also affect the external redecoration programmes which are an integral part of the maintenance of the late Victorian mansion blocks. Redecoration programmes will have to be delayed while the VSU works are being carried out which is likely in turn to add to the costs of these major works. Many residents are leaseholders who together own the freehold or a headlease in their block and as such these costs are borne directly by residents themselves. None of these impacts are taken into account in the assessment.

4.14. Westminster Cathedral (*excluded from para 6.4.23*) must be specifically monitored throughout the construction phase for dust impacts as well as noise and vibration impacts as should The Passage (Convent of St Vincent de Paul) and the two local schools and the monitoring process agreed with them.

Noise

4.15. Residential properties in Carlisle Place (Evelyn Mansions, Carlisle Mansions, Cardinal Mansions) are likely to experience significant airborne noise from daytime construction activity (*table 6-2*) and Evelyn Mansions on Carlisle Place is also likely to experience significant groundborne noise (vibration) from construction (*table 6.4 page 6-20*). Whilst it is noted that a Noise Policy has been prepared (*para 6.3.23*), no discussion with residents of what this may mean for them has been undertaken by the applicant and as far as can be seen the Noise Policy is not set out anywhere in the application documentation and so its contents cannot be assessed. It may be that the Noise Policy is the document set out at Appendix 2 of the draft CCP but this is unclear.

Visual Impacts

4.16. Residents of Evelyn Mansions and Carlisle Place are considered to be high sensitivity receptors in the ZVI (*para 6.5.3*) and pedestrians passing through the ZVI (presumably this includes residents, school children and users of the Cathedral although none are mentioned) are considered to be medium sensitivity receptors. Westminster Cathedral, Carlisle Place and Ashley Place was also identified as one of the 3 character areas forming the baseline and yet no further mention is made of the residents of Carlisle Place and Evelyn Mansions or residents at large. Office workers and theatre goers appear to be given greater attention than residents who will experience these impacts throughout the construction phase on a daily basis (*para 6.5.10*).

4.17. The impact of the Vauxhall Bridge Road worksite (worksite G) does not appear to have been considered in respect on its impact on residents of Evelyn Mansions or included in the ZVI (*plan 6.5(1)*).

Cumulative Impacts

4.18 Paragraph 7.2.5 of the ES states that, "the assessment of combined effects collated significant residual effects likely to directly affect the local community." Although the meaning of this statement is far from clear, it does not bode well for residents. Table 7-1 summarises these combined effects during the construction period but largely fails to consider them from a resident's viewpoint.

4.19. The first 5 impacts in Table 7-1 are noted under "Traffic" but are more correctly described in CARG's view as pedestrian impacts and heighten the concerns raised above, under the heading "Traffic - Pedestrian Movement". It seems that little is capable of being done to mitigate these effects except marshalling and signing.

4.20. Impacts 6 -12 are also under the heading of "Traffic" and largely entail longer walks for passengers of various bus or taxi services. As such they add to the impact on the residential community in that bus and taxi users are being diverted away from the main transport interchange and into the surrounding area adding further to congestion. The impacts fail however to take account of the impact that bus re-routing will have on residents as pedestrians or in terms of residential amenity e.g. impact of proposed bus layover facilities on Vauxhall Bridge Road. CARG endorses VIG's Statement of Case in respect of Buses (*para* 7.9.3 - 7.9.8).

4.21. Impacts 13 and 14 deal with the carriageway works affecting Bressenden Place and Wilton Road which will cause additional delays to road users. Again this impact has a disproportionate impact on residents who are not able to avoid the area in order to access their homes. Also as stated in paragraph 4.8 above, CARG is concerned that there will be knock-on impacts on the residential streets associated with cars and taxis trying to find alternative routes.

4.22. Impacts 18 - 24 are under the heading of "Visual Amenity" and as with the detailed assessment no mention of the impact on residents is made yet they more than any other group are likely to experience this impact. CARG also believe that residents are most likely to be concerned about visual amenity in that central Victoria and the Residential Quarter is their local neighbourhood and community.

4.23. Impacts 35 - 43 deal with residual noise impacts affecting properties in Carlisle Place and which are significant during lengthy construction periods e.g. Impact 40 on 1 Carlisle Mansions over a three and a half year period.

4.24. Given the knowledge by the applicant of these impacts, the failure to make an assessment of the specific community affected or to make direct approaches to residents of individual residential blocks prior to the submission of the application and latterly only as a result of objections made is considered unacceptable. Neither is it accepted, given recent experience of construction

activity in the locality, that there will be no residual dust impacts affecting the Residential Quarter.

4.25. CARG endorses the request from VIG that the scheme should not proceed until an impact study relating to the residential population in general is produced and that the position of specific groups of residents is also assessed. Such an assessment should also consider the situation for residents in the case of an emergency arising out of the construction activity itself, the scheme once operational and how emergency services will access the area generally during construction.

5. IMPACT UPON THE CATHEDRAL CONSERVATION AREA

5.1. As well as considering the impacts of the scheme upon individual streets and localities we consider that the Conservation Area as a whole needs to be considered in terms of its townscape and historic character and valued in its own right. Major development proposals such as this one have potential to damage and degrade the Conservation Area as impacts go beyond the limits of the works themselves. For example, through increased vehicular and pedestrian activity and re-routing, construction traffic, dirt and noise and visual intrusion.

5.2. A Conservation Area Protection Plan should form part of the construction methodology and to ensure the continued conservation of the area once the scheme is in operation. No such objectives are currently within the Construction Strategy (*section 2.1 of the draft Code of Construction Practice (CCP)*). The closest objective to the idea of a protection plan being found in para 2.1.1(b) which is to limit adverse impacts on the local community and the environment so far as reasonably practicable. As we have already noted however there is no coherent assessment of the residential community and the conservation areas are merely mentioned in terms of there being considered to be no significant impact on their Setting (*ES page 6-48, para 6.6.63*). It is unclear what "Setting" means in this context but we believe that wider consideration should be given to the protection of the Conservation Area and the landmark buildings within it.

5.3. The City Council and key local stakeholders (including CARG) are currently involved in the production of a Cathedral Piazza Action Plan to consider the long term design, management, use and funding of the Piazza as a public space. As part of a Conservation Area Protection Plan the applicant should ensure that the impacts of the construction works do not adversely effect the implementation of the Action Plan and, where possible take steps to complement it.

5.4. These considerations also apply to the future above-ground building comprising the Victoria Street/Bressenden Place corner site development. CARG endorses the views expressed by the City Council (letter of Objection dated 16 January 2008) concerning the need to bring forward an appropriate development proposal for the station portal and CARG believes that this

should be done before the works for the scheme itself can proceed. The eventual design of that building could have major impacts on the Conservation Area and its residents in terms of issues such as light pollution. The planning application for the corner site development that was submitted in summer 2007, and later withdrawn, demonstrates how lacking in appreciation of the character and appearance of the Conservation Area the applicant may be.

6. PROPOSED CODE OF CONSTRUCTION PRACTICE

6.1. The Code of Construction Practice (CCP) appears to be the critical document in controlling the environmental impacts of the scheme during construction and providing mitigation measures. As such it is extremely important that the CCP is effective, is settled prior to powers for the scheme being granted and is designed to protect the residential environment and the Conservation Area.

6.2. As set out in CARG's letter of objection on 31 January 2008, we are particularly concerned about the following points within the draft CCP and they are set out again below for completeness. The CCP is however a detailed and specialised technical document and so CARG will also look to the City Council to protect both the interests of residents and the Conservation Area in its negotiations with the applicant on a suitable CCP. Currently the draft CCP would enable:

- enables LUL to agree working outside normal hours or changes to working hours with Westminster City Council and merely *inform* nearby occupiers 'as soon as reasonably practicable' (*para 3.2.14*),
- enables LUL to extend deliveries to the site beyond normal working hours up to 2200 from Monday to Friday (*para 3.2.15*),
- contains no provision for external inspection of site lighting (LUL relied upon to ensure it does not unnecessarily intrude on adjacent buildings) (*para 3.5.1*),
- emergency procedures (including evacuation) do not include specific reference to local residents and therefore no specific measures detailed (*para 3.6.1*),
- there is insufficient guarantee of compensating residents for effect of electromagnetic interference on wireless telecommunications systems (*para 3.10*),
- LUL will apply Best Practicable Means to control and limit noise and vibration and obtain consents under the Control of Pollution Act obtained from the City Council accordingly (*para 5.1.1*) and the City Council will receive the results of any noise and vibration monitoring (*para 5.2.1*). No mention is made of compensation for building

damage nor agreement to continue to monitor for any structural defects showing up post construction,

- there are insufficient strictures on type of vehicles deployed by contractors – no prohibition on diesel-driven vehicles for example (*para 5.3.1*) although (*para 6.2.2 (i)*) commercial road vehicles used in construction must meet Euro III standards but heavy lorries not expected to meet Euro IV until 01/2012),
- there is insufficient detail regards Enhanced Dust Control measures (*para 6.3.5*) needed for certain stages of construction,
- although a recognition that 'pumped groundwater drainage takes place in basements of adjacent buildings.....to prevent groundwater flooding' (*para 7.5.1*) conditional commitment only is given by LUL to routine water quality monitoring (*para 7.5.1 (a)*),
- there is currently no consideration of the Conservation Area in section 11 on Archaeology and Built Heritage.

6.3. CARG endorses Westminster City Council's suggestion in its letter of objection of 16 January 2008 that a Liaison Group, which includes local residents, be established to consider the issues associated with the works and to identify solutions. This goes further than community liaison (*CCP section 2.5*) to include real involvement and consultation with residents rather than merely the provision of information. Through the Liaison Group residents should also be consulted on the production of the Environmental Management Plans (EMPs) (*CCP para 2.4.2.*) including Site Environmental Management Plans, Traffic Management Plans and, as proposed by CARG, Pedestrian Management Plans and a Conservation Area Protection Plan.

6.4. CARG also believes that the applicant should make funds available to support an adequately qualified and staffed Environmental Inspectorate under the direction of the City Council to enable the independent monitoring of the works throughout the construction period.

7. OPERATIONAL MATTERS

7.1. There is a need for ongoing monitoring of the scheme once the construction works are over. At present it is very difficult to gain any view of what life in the Residential Quarter will be like once the scheme is operational since neither the Conservation Area nor the specific community within the Residential Quarter has been assessed. CARG considers that the operational circumstances must also be part of the comprehensive assessment that it is requesting.

7.2. The assessment and subsequent monitoring to include such matters as settlement (identified at Evelyn Mansions), visual impacts (especially once the

corner site station portal building has been constructed), vehicular and pedestrian movement in Victoria and the Residential Quarter, management of the station entrance (e.g. loitering, littering, use of advertising and lighting). The Liaison Group would be an appropriate forum in which information and dialogue between the applicant and local stakeholders could be exchanged and so should be maintained once the scheme is operational and so long as there is a need.

8. CONCLUSIONS

- Insufficient consideration has been given to the Residential Quarter and the Cathedral Conservation Area in the applicant's assessment of both construction and operational impacts. This partly stems from insufficient consultation with residents prior to the submission of the application.
- As a result, further assessment work is required and an additional impact study should be carried out.
- The Code of Construction Practice is lacking in a number of respects and should also include Pedestrian Management Plans and a Conservation Area Protection Plan.
- The applicant should be willing to fully engage with the local community through a Liaison Group during both the construction and into the operational phases so long as it is required.
- The applicant should make clear what constitutes its Noise Policy and set out what compensation it is proposing for residents who suffer noise nuisance.
- Similarly, property damage, increased costs due to delayed maintenance programmes, increased levels of cleaning, increased insurance premiums as a result of increased risks associated with the works must all be compensated where residential blocks are affected.
- The scheme should not be permitted to proceed until planning permission is obtained for the corner site building on the Victoria Street/ Bressenden Place junction.
- It is acknowledged by the applicant that the residential community will experience adverse impacts during the lengthy construction period but will gain little if at all from the completed scheme. As such the applicant must be prepared to take positive steps to protect and compensate residents and the Conservation Area in which they live.

9. LIST OF DOCUMENTS

CARG Constitution

Westminster City Council, Cathedral Conservation Area Audit, Consultation Draft Nov 2007.

Westminster City Council, Facts & Figures 2007/8.

Department for Transport, Guide to TWA Procedures, 2006.

St Vincent de Paul Primary School, School Travel Plan.

Victoria Interchange Group, Statement of Case.

Westminster City Council Letter of Objection dated 16 January 2008.

Any other documents as may be required.

APPENDIX 1: CARG MEMBERSHIP

Full Members

Ashley Court, Morpeth Terrace

Ashley Gardens Residents' Association (covering Blocks 1- 5 Ambrosden Avenue, 8, 9 and 11 Thirleby Road, Ashley Gardens)

Block 6 Ashley Gardens, Thirleby Road

Block 10 Ashley Gardens, Thirleby Road

Cardinal Mansions, Carlisle Place

1 – 3 Carlisle Place

1 -35 Carlisle Mansions, Carlisle Place

41 – 85 Carlisle Mansions, Carlisle Place

192 Emery Hill Street

Evelyn Mansions Residents' Association, Carlisle Place

1 – 3 Morpeth Terrace

Morpeth Mansions Residents' Association, Morpeth Terrace

Affiliate Members

Ashley Gardens, Emery Hill Street