

CITY OF WESTMINSTER			
PLANNING APPLICATIONS COMMITTEE	Date 15 September 2015	Classification For General Release	
Report of Director of Planning		Wards involved Regent's Park	
Subject of Report	St John's Wood Police Station , 20 Newcourt Street, London, NW8 7AA		
Proposal	Three storey rear link building and two storey rear extension and associated external alterations in connection with conversion of former St John's Wood Police Station to residential (Class C3) comprising 2x1 bedroom; 3x2 bedroom, 2x3 bedroom and 1x4 bedroom flats.		
Agent	Turley		
On behalf of	Newcourt Property Holdings Ltd		
Registered Number	14/11909/FULL	TP / PP No	TP/25599
Date of Application	03.12.2014	Date amended/ completed	26.01.2015
Category of Application	Minor		
Historic Building Grade	Unlisted		
Conservation Area	St John's Wood		
Development Plan Context - London Plan July 2011 - Westminster's City Plan: Strategic Policies 2013 - Unitary Development Plan (UDP) January 2007	Outside London Plan Central Activities Zone Outside Central Activities Zone		
Stress Area	Outside Stress Area		
Current Licensing Position	Not Applicable		

1. RECOMMENDATION

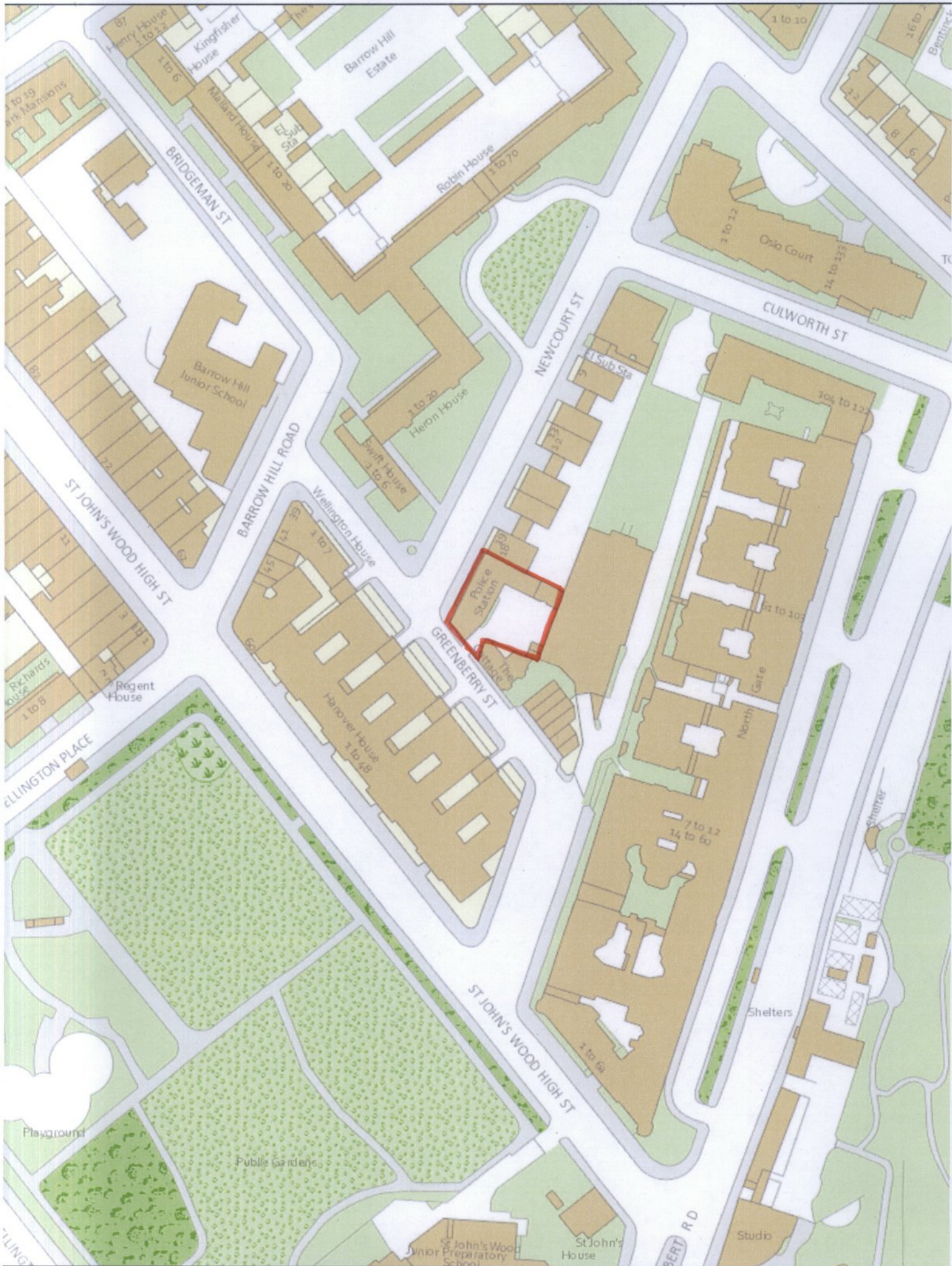
For Committee's consideration:

1) Does the Committee agree that, notwithstanding the inadequacy of the marketing, the policy presumption to retain a social and community use on the site can be replaced by a financial contribution towards an appropriate community and cultural project in the St. John's Wood Ward on the basis that there is currently insufficient evidence of a demand for social and community uses in the area.

2) Subject to 1) above, grant conditional permission (including amending conditions), subject to a S106 legal agreement to secure a financial contribution of £150,000 towards a community and cultural project in the St. John's Wood Ward area (index linked and payable on commencement of development).

3) If the S106 legal agreement has not been completed within six weeks of the date of this resolution then:

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





ST JOHN'S WOOD POLICE STATION, 20 NEWCOURT STREET, NW8

2. SUMMARY

Planning permission is sought to extend and alter to this unlisted building of merit within the St John's Wood Conservation Area, in connection with a change of use from vacant police station (social and community use) to eight residential flats with associated car parking (car stackers) and associated cycle and refuse storage to rear courtyard area. Representations of objection have been received on design and amenity grounds from the St John's Wood Society and three local residents.

The key issues are:

- Loss of social and community floorspace from the site.
- The impact of the proposed development on the character and appearance of this unlisted building of merit and the St John's Wood Conservation Area.
- The impact of the proposed development on the amenities of surrounding residents in terms of noise and disturbance.

The proposal is considered acceptable in design and conservation and amenity terms, subject to conditions (including amending conditions). However, the Committee's views are sought regarding the acceptability of the loss of the social and community floorspace and whether notwithstanding the inadequacy of the marketing, the policy presumption to retain a social and community use on the site can be replaced by a financial contribution towards an appropriate community and cultural project in the St. John's Wood Ward, on the basis that there is currently insufficient evidence of a demand for social and community uses in the area.

3. CONSULTATIONS

THAMES WATER

No objection, general water advice given.

HOUSING MANAGER

Any response to be reported verbally.

ENVIRONMENTAL HEALTH

Further details of multi parking system required. Standard noise conditions recommended.

GO GREEN PROGRAMME MANAGER

Higher standard in energy efficiency required, condition recommended.

HIGHWAYS PLANNING MANAGER

Acceptable on transportation grounds, subject to conditions.

ARBORICULTURAL MANAGER

No trees within site. Proposed green wall is not a sustainable way to provide greenery. Recommend redesign of the yard space more efficiently to increase soft landscaping at ground level. Proposed landscaping is not adequate and does not improve the appearance of the conservation area.

CLEANSING MANAGER

No objection, subject to permanency condition.

BUILDING CONTROL

No comment.

ST JOHN'S WOOD SOCIETY

Over development of site at the cost of architectural quality and amenity. Green wall does not work against the Victorian architecture and will be reliant on maintenance. No sense of arrival at the flats as the access is only through the automated gate system (should not have a solid backing). Building has lost its symbolic historic entrance on Newcourt Street. Location of car stacker and bin store will have a major negative impact on the adjoining property.

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS:

No. Consulted: 263 Total. No. of Replies: 3

Amenity

- Existing gates to yard cause The Cottage adjacent to shake.
- Car lifts would cause noise and disturbance to residents of The Cottage.
- Cycle storage attached to The Cottage would cause noise and disturbance.
- Refuse storage next to party wall of The Cottage would cause noise and disturbance and would be a health and safety issue.
- Any change in elevation would block sunlight to Hanover House, St John's Wood High Street.

Design.

- Car lifts unsightly.
- Don't think much of green wall.

Transportation

- Question need for cycle storage given Barclay bikes in Greenberry Street
- No provision for wheelchair access to the building.

Construction

- Noise, disturbance and dust from construction works would affect sleep of 18 month old daughter.

ADVERTISEMENT /SITE NOTICE: Yes

4. BACKGROUND INFORMATION**4.1 The Application Site**

St John's Wood Police Station is designated as an unlisted building of merit located on the corner of Newcourt Street and Greenberry Street, within the St John's Wood Conservation Area. It is surrounded on all sides by residential properties, including The Cottage on Greenberry Street which adjoins the site to the rear and the flats within 18-19 Newcourt Street which adjoin to the north.

4.2 Relevant History

The site was used by the Metropolitan Police as a Police Station until 2013 when it was vacated prior to its subsequent sale on the open market.

5. THE PROPOSAL

Planning permission is sought for a two storey rear extension and three storey link extension in connection with the creation of eight residential units comprising of 2x1 bedroom, 3x2 bedroom, and 2x3 bedroom and 1x4 bedroom unit. Vehicles would utilise the existing access to the rear curtilage of the site from Greenberry Street and car parking (in the form of car stackers), cycle storage and provision for waste and recycling are proposed in this area.

6. DETAILED CONSIDERATIONS

6.1 Land Use

6.1.1 Loss of social and community use

As a former police station, this site constitutes a social and community facility, as defined in Westminster's City Plan: Strategic Policies (adopted 2013) ("the City Plan") and a community facility, as defined in the UDP. The proposal entails conversion of this social and community floorspace into residential use although none of the representations received are concerned with the loss of this floorspace.

Policy S34 of the City Plan states that "all social and community floorspace will be protected except where existing provision is being reconfigured, upgraded or is being re-located in order to improve services and meet identified needs as part of a published strategy by a local service provider. In all such cases the Council will need to be satisfied that the overall level of social and community provision is improved and there is no demand for an alternative social and community use for that floorspace".

Accordingly, the loss of this social and community floorspace, must be considered against the following tests:

1. Whether existing provision is being reconfigured, upgraded or is being re-located in order to improve services and meet identified needs as part of a published strategy by a local service provider; and
2. There is no demand from an alternative social and community use for this floorspace.

1. Existing provision

This site, as well as two others in Westminster (Marylebone and Harrow Road Police Stations) have become surplus to the Metropolitan Police's requirements, as set out in the Mayor of London's Policing and Crime (MOPAC) Estates Strategy 2013-2016 (Published May 2013) and have closed. These closures have not been accompanied by the opening of new stations elsewhere in Westminster nor is it the Metropolitan Police Services (MPS) intention to do so. As such, and strictly speaking, the closure of this and other police stations in Westminster have not resulted in reconfiguration, upgrade or re-location of their floorspace.

However, the overall objective of the estate's strategy is "To deliver a more efficient and higher quality estate which meets the operational needs of the Metropolitan Police Service (MPS) and is significantly lower in cost to run". To achieve this, the estates strategy states that capital from sales of redundant properties are reinvested in more modern facilities that enhance opportunities for members of the public to access police services, including the provision of more police officers. The emergence of redundant floorspace in the MPS estate is unsurprising, with modern working practices, such as increased use of mobile computerisation, reducing the need for physical storage and desk space. Accordingly, it is recognised that the cost to the MPS of maintaining this surplus floorspace would prevent the provision of more tangible service improvements, such as the provision of more police officers.

MOPAC's 2013/14 Annual Report also states that the sale of this and other properties have raised £125 million to invest in front-line policing throughout London. This has included the recruitment of 2,343 new police officers and redeployment of 2000 officers from back office to front line roles.

In Westminster, the four police stations are:-

- West End Central Police Station: 24/7
- Charing Cross Police Station: 24/7
- Paddington Green Police Station: 8am – 6pm
- Belgravia Police Station: 8am – 10pm

In addition, four contact points are proposed (contact points are locations where the public can have non-urgent face-to-face contact with their local police), one of which is at St John's Wood Library, Circus Road, the others are based in W10 (Beethoven Centre, Third Avenue), W11 and SW1. Other front counter police services are located within Camden (Swiss Cottage and West End Lane).

Whilst the loss of this police station is regrettable, it is recognised that changing ways of work have made some of the MPS's floorspace redundant and that revenue raised from the sale of these buildings have resulted in tangible policing improvements, such as more front line officers. Accordingly, the improvement sought by policy S34 of the City Plan would be achieved via the Mayor's published strategy, albeit not through reconfiguration, upgrade or re-location of the social and community floorspace on this site.

2. Demand for alternative social and community use

The applicant contends that their marketing evidence demonstrates that there is no demand for the social and community floorspace on-site. However, an independent review undertaken on behalf of the City Council by GVA Grimley Limited, suggests that whilst the length of marketing has exceeded 12 months, it has not been robust. Based on the applicant's marketing evidence, the site has not been clearly and specifically marketed for social and community uses and the marketing process is not sufficient to be able to prove there was absolutely no social and community demand for the property. The applicant has not sufficiently demonstrated beyond all reasonable doubt that there is no demand.

The applicant suggests that it is clear from the existing social and community provision that there is already a very good level of community services that are accessible to the site and local area including:-

- St John's Wood Library, Circus Road
- A total of 14 schools; 13 within NW8.
- 3 General Practitioners (GP's); The Wellington Health Centre, Wellington Road, St Johns Wood Medical Practice, Grove End Road and Lisson Grove Health Centre, Gateforth Street.
- 3 Dentists; St John's Wood Orthodontic Clinic, Queens Grove, Shidler LJ Dental Practice, Finchley Road, and Lisson Grove Health Centre Orthodontic Clinic, Gateforth Street.
- Places of Worship; The Liberal Jewish Synagogue, St John's Wood Road, St John's Woods Church, St Johns Wood High-street, Church of Our Lady R.C, Lodge Road, London Central Mosque Trust Ltd, Park Road, Handmaids of the Sacred Heart of Jesus, St Edmunds Terrace, Abbey Road Baptiste Church, Abbey Road, Comunidade Batiste De Londres, St Johns Wood Road.
- Leisure and Sports Facilities; The Hub, Regents Park Outer Circle, Little Venice Sports Centre Crompton Street, Seymour Leisure Centre, Seymour Place, St Georges RC School, Lanark Road, and Paddington Recreation Ground, Randolph Avenue.

Whilst the above is acknowledged, it does not assist in proving that there is no demand from an alternative social and community use for this site as required by policy S34 of the City

Plan. Notwithstanding this, the presence of a number of facilities could be an indicator of high demand for them, rather than an excess of supply.

The applicant has also sought to mitigate against the loss of this social and community floorspace by the provision of a financial contribution of £150,000, potentially towards community and cultural projects in the area, public realm improvements in the area and improvements in playspace and civic space within the area. However, officers consider that to be considered as mitigation for the loss of social and community floorspace, the full £150,000 (index linked and payable on commencement of development) should be directed towards a community and cultural project in the St. John's Wood Ward area.

The Committee's views are therefore sought regarding the acceptability of the loss of the social and community floorspace and whether notwithstanding the inadequacy of the marketing, the policy presumption to retain a social and community use on the site can be replaced by a financial contribution towards an appropriate community and cultural project in the St. John's Wood Ward on the basis that there is currently insufficient evidence of a demand for social and community uses in the area.

6.1.2 Residential

In the event that the loss of the social and community is justified, residential use is the priority replacement use.

Eight new residential units of accommodation are proposed, comprising of; 2x1 bedroom, 3x2 bedroom, 2x3 bedroom and 1x4 bedroom unit. All three of the family sized units and one of the two bedroom units are dual aspect, two further two bedroom units within the extension to the rear are partially dual aspect and the two one bedroom units are single aspect.

Whilst three bedrooms located at lower ground floor level within the duplex family units do not provide for the minimum levels of daylight suggested in the BRE guidelines, the applicant has suggested that with careful consideration of reflectance value of room surfaces (floors, walls, ceilings), the BRE minimum levels (1% Average Daylight Factor ADF) for bedrooms could be achieved. Given that these poor levels of daylight relate to one or two bedrooms within the large duplex units of private accommodation, it is not considered justification to withhold permission on this ground.

Two of the proposed residential units would have external balconies which would also be their main access. There is scope for the rear courtyard to be designed for use, but this area is also proposed to be used for parking, cycle storage and waste storage and there is therefore a space limitation and potential conflict of these uses. Whilst regrettable, the lack of external amenity space is not in this case considered to justify withholding permission.

Overall the mix of unit sizes (three of the eight units are family sized) and their size (55m²-158m²) and layout provides a satisfactory internal residential environment for future occupiers, with overall adequate daylight, aspect and privacy and meets the aims of Policies H5 and ENV13 of the UDP and S15 and S29 of the City Plan.

The provision of eight new residential units on site accommodated within less than 1,000m² of floor space does not meet the threshold requirement for the provision of affordable housing under Policy H4 of the UDP and Policy S16 of the City Plan.

6.2 Townscape and Design

St John's Wood Police Station is designated as an "unlisted building of merit" within the City Council's St John's Wood Conservation Area Audit. It is a handsome classically influenced mid-19th century building, which makes a positive contribution to the character and appearance of the conservation area.

6.2.1 Rear extensions

The proposed rear extensions are considered acceptable in principle in design terms (although require a reduction in height in amenity terms, see section 6.3), subject to an amendment to the two storey rear projection so as not to overlap the original building. Their height and bulk remain subordinate in scale and the overall traditional design using traditional brickwork with punched openings and sash windows, (essentially a pared down palette of the existing detailing), is acceptable. The objection raised by the St John's Wood Society on grounds of overdevelopment is not supported by officers.

However, there are some minor design details that could be improved upon, including detailed design of doors, railings, gate design including the retention of the attractive gate piers and the use of lead to the lift shaft. Subject to these details the extensions are considered acceptable.

6.2.2 Green wall

The existing side elevation of this unlisted building of merit is attractively detailed with brick cornices and is highly visible in the public domain.

As such the proposed green wall is considered to be an inappropriate feature on this attractive building, of detriment to its character and appearance. This is a view supported by the St John's Wood Society and a local resident. For this reason (as well as other reasons detailed in this report), it is considered necessary to impose an amending condition to seek the removal of this unacceptable feature from the proposal.

6.2.3 Vehicular and pedestrian gate

The replacement vehicular and pedestrian gate to Greenberry Street is acceptable in principle, but the present design is too ornate for a utilitarian public building and does not therefore reflect the architecture of the building or former use. The design could easily be refined to resolve this and to retain its attractive piers and a condition is recommended to this affect.

6.2.4 Other alterations

The main entrance door to the building on Newcourt Street is to be retained (although an entrance via the rear courtyard is also proposed to the residential unit that this serves), which is welcomed as the entrance door is a positive element visually and in urban design terms.

An objection has been raised to the car stackers on grounds of them being unsightly. It is accepted that when in use the structure would be seen above ground level, however when not in use, the structure would be underground and would not be seen. In the interests of visual amenities a condition is recommended to ensure that the car stacker remains in a down position when not in use.

6.2.5 Design and conservation conclusions

Subject to the recommended conditions already mentioned together with conditions to require samples of materials, a sample panel of brickwork and details of joinery to ensure appropriate

design detailing, the proposal is acceptable in design and conservation terms in accordance with Policies DES 1, DES 5, DES 6 and DES 9 of our UDP and Policies S25 and S29 of our City Plan.

6.3 Amenity

6.3.1 Daylight and sunlight, sense of enclosure and privacy

The closest residential neighbours to the proposed extension are occupiers of The Cottage on Greenberry Street and the occupiers of flats within 18-19 Newcourt Street.

The Cottage is a two storey single family dwelling house which shares a boundary with the application site and is located behind the existing building on Greenberry Street adjacent to the existing vehicular access gates. This property has a first floor window (bedroom) to its flank elevation and three first floor windows (hallway and two bathroom windows) to its rear elevation, all of which overlook the rear of the application site. The proposed rear extension to the building would be located between 13-16.5m away from this neighbouring property's hallway and bathroom rear facing windows. Given the distance, angle of view and nature of the rooms which the windows serve, it is not considered that the proposed extension would result in any significant loss of light or privacy or increased sense of enclosure to this neighbour.

In terms of the flats within 18-19 Newcourt Street, there are windows at ground, first, second and third floor level within their rear elevation which lie directly adjacent to the proposed extension. The applicant's Daylight and sunlight survey indicates that the proposal would result in a loss of daylight and winter sunlight to the ground and first floor rear windows above and beyond the tolerances set out in the BRE guidelines. The result is that these two rooms would see a 25-31% reduction in daylight (24-32% VSC to 18-22 %VSC respectively) together with a 83% loss of winter sunlight (6 -18% to 1-3%). Whilst a loss of daylight would occur, the two rooms would still receive fairly high levels of daylight (between 18-22%) VSC compared to 25%VSC sought within the guidelines. In terms of sunlight, annual sunlight would still exceed the guidelines and on this basis the loss of winter sunlight, whilst regrettable is not considered so significant so as to withhold permission.

However, the height and bulk of the two-storey extension raises concern with regard to a significant increase in sense of enclosure on the boundary with the neighbouring properties at 18-19 Newcourt Street. Given the excessive floor to ceiling height proposed it is considered that there is scope to overcome this issue by reducing the height of the two-storey extension to no more than 7m in height. An amending condition is proposed to secure this in order to reduce the impact on these neighbours. Therefore subject to this amendment the physical impact of the extensions are considered acceptable in amenity terms.

Given the orientation of the proposed windows within the development and the relationship with neighbouring properties, it is not considered the proposal would result in any significant loss of privacy. The courtyard was previously used in connection with the Police Station activities. The proposed use of the courtyard would comprise of activities ancillary to the use of the site for residential purposes including parking of cars by residents, cycle storage and refuse storage. These activities are not considered to result in any significant loss of privacy, given the previous use of the courtyard.

The closest other residential neighbours are located on the opposite side of Greenberry Street (Hanover House) and Newcourt Street and given the location of these properties and their relationship with the application site, the amenities they currently enjoy are not considered to be affected by the proposal. The concern raised by an occupier of Hanover House is therefore unsustainable.

Overall the proposal is, subject to amending conditions, considered to protect the amenities of surrounding residents in accordance with policy ENV13 of our UDP and S29 of our City Plan.

6.3.2 Noise and disturbance from activities and mechanical plant

The proposed change of use of the site from a police station which has more recently been vacant, to residential use, will change the nature of the activities that take place within the site. Compared to a fully operational police station, the activities associated with eight residential units of accommodation is not considered to raise any significant issues with respect to noise and disturbance associated with vehicular and pedestrian and other associated activity. However the location of the cycle parking and waste store close to or on the boundary with The Cottage is regrettably not particularly neighbourly and has brought about objection from the occupiers of The Cottage and the St Johns Wood Society. An amending condition is recommended to seek an alternative more neighbourly location within the rear courtyard so as to minimise the effect of the proposal on neighbouring residents.

Whilst no mechanical plant is proposed for heating or cooling, a mechanical car stacker and automated vehicular and pedestrian access gate are proposed, although no manufacturing details or associated acoustic report have been provided at this stage. Given the potential for this equipment to cause noise and disturbance, a concern also raised by the occupiers of The Cottage, further details are proposed to be required by condition to ensure that the amenities of neighbours and future occupiers of the development are protected as requested by the City Council's Environmental Health officer in accordance with Policies ENV6, ENV7, ENV13 of our UDP and S29 of our City Plan.

6.4 Transportation

The provision of underground mechanical car stackers within the rear curtilage of the site will provide off street car parking for eight cars, one for each new residential unit created on site, in accordance with TRANS23 of our UDP. However, further details of the car stackers are required for amenity reasons (see earlier in the report) along with a revised lower ground/basement plan to show the area of the car stacker structure on plan.

Whilst provision is made for eight secure vertical cycle racks on the boundary wall of the site (adjacent to The Cottage), this is neither neighbourly or weatherproof and on this basis a condition is recommended to secure an alternative location and design which is weatherproof, in order to satisfy TRANS10 of our UDP. Whilst a representation has been received questioning the need for cycle storage, given the local Barclay cycle docking station in Greenberry Street, the cycle storage proposed on site is specifically to serve the eight new flats and not the general public at large.

Whilst adequate provisions is made for the storage of waste and recyclables within the rear yard its location on the boundary with The Cottage is considered unneighbourly and a revised location is sought by condition.

6.5 Economic Considerations

The applicant is proposing a £150,000 financial contribution (index linked and payable on commencement of development) in mitigation of the loss of the social and community floorspace from this site.

6.6 Equalities and Diversities (including Disabled Access)

None relevant.

6.7 London Plan

Policy 3.16 of the London Plan states, inter alia, "The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered". See section 6.1 for expansion on this issue.

6.8 National Policy/Guidance Considerations

Central Government's National Planning Policy Framework (NPPF) came into effect on 27 March 2012. It sets out the Government's planning policies and how they are expected to be applied. The NPPF has replaced almost all of the Government's existing published planning policy statements/guidance as well as the circulars on planning obligations and strategic planning in London. It is a material consideration in determining planning applications.

Until 27 March 2013, the City Council was able to give full weight to relevant policies in the Core Strategy and London Plan, even if there was a limited degree of conflict with the framework. The City Council is now required to give due weight to relevant policies in existing plans "according to their degree of consistency" with the NPPF. Westminster's City Plan: Strategic Policies was adopted by Full Council on 13 November 2013 and is fully compliant with the NPPF. For the UDP, due weight should be given to relevant policies according to their degree of consistency with the NPPF (the closer the policies in the plan to the NPPF, the greater the weight that may be given).

The UDP policies referred to in the consideration of this application are considered to be consistent with the NPPF unless stated otherwise

6.9 Planning Obligations

On 06 April 2010 the Community Infrastructure Levy (CIL) Regulations came into force which make it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not, if the obligation does not meet all of the following three tests:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development;
- (c) fairly and reasonably related in scale and kind to the development.

Policy S33 of the City Plan relates to planning obligations. It states that the Council will require mitigation of the directly related impacts of the development; ensure the development complies with policy requirements within the development plan; and if appropriate, seek contributions for supporting infrastructure. Planning obligations and any Community Infrastructure Levy contributions will be sought at a level that ensures that the overall delivery of appropriate development is not compromised.

From 06 April 2015, the Community Infrastructure Levy Regulations (2010 as amended) impose restrictions on the use of planning obligations requiring the funding or provision of a type of infrastructure or a particular infrastructure project. Where five or more obligations relating to planning permissions granted by the City Council have been entered into since 06 April 2010 which provide for the funding or provision of the same infrastructure types or projects, it is unlawful to take further obligations for their funding or provision into account as a reason for granting planning permission. These restrictions do not apply to funding or provision of non-infrastructure items (such as affordable housing) or to requirements for developers to enter into agreements under section 278 of the Highways Act 1980 dealing with highway works. The recommendations and detailed considerations underpinning them in this report have taken these restrictions into account.

The City Council has consulted on the setting of its own Community Infrastructure Levy, which is likely to be introduced later in 2015. In the interim period, the City Council has issued interim guidance on how to ensure its policies continue to be implemented and undue delay to development avoided. This includes using the full range of statutory powers available to the Council and working pro-actively with applicants to continue to secure infrastructure projects by other means, such as through incorporating infrastructure into the design of schemes and co-ordinating joint approaches with developers.

For reasons outlined elsewhere in this report, a S106 legal agreement will be required to secure the following in mitigation of the loss of the social and community floorspace:

-A financial contribution of £150,000 towards a community and cultural project in the St. John's Wood Ward area (index linked and payable on commencement of development).

The proposed development is also liable for a Mayoral CiL payment.

It is considered that the 'Heads of Terms' listed above satisfactorily address City Council policies. The planning obligations to be secured, as outlined in this report, are in accordance with the City Council's adopted City Plan and London Plan policies and they do not conflict with the Community Infrastructure Levy Regulations (2010 as amended).

6.10 Environmental Assessment including Sustainability and Biodiversity issues

The proposal is expected to achieve Level 4 Code for Sustainable Homes, although it is noted that the Code for Sustainable Homes has now been incorporated into the Building Regulations.

The Go Green Programme Manager would like the development to achieve a higher site regulated Co2 reduction on 2013 Building Regulations, however, this is not a major development and policy requirements are therefore much more limited. As such the sustainability of the proposed development to include the above ratings, whilst minimal, is not considered to justify withholding permission in light of policy S28 of the City Plan.

The proposal incorporates a wall planted "living wall" by Tree box on the flank elevation of the existing building facing Greenberry Street and the introduction of 2.5m² (1.4mx1.8m) soft planting within the rear curtilage of the site. The living wall is not considered to be appropriate in biodiverse terms and has brought about negative representation from the St John's Wood Society, a local resident and the City Council's Arboricultural Manager, it also has negative implications for the character and appearance of the building and the townscape (see section 6.2 of this report).

The green wall is proposed to protrude 150mm (100mm beyond the brick corbelling (50mm)) and it is proposed to irrigate the wall with rainwater harvested in the site so apart from the electricity for the pump, the water is a sustainable source (although details of a rainwater tank have not been provided). However, green walls are not easy to sustain and require regular maintenance and replanting and the height of the wall will make maintenance difficult and therefore costly. No details of the calculated water requirement for the wall per day and how the supply be maintained during dry periods has been provided.

There are no trees within the site, presumably due to the previous use of the site as a working Police Station. However, the change of use to residential provides the opportunity to introduce

significant soft landscaping. It is accepted that the rear curtilage area incorporates car and cycle parking and provision for waste and recycling, however the 2.5m² of soft landscaping is measly and inadequate. For the reasons stated it is considered appropriate to impose an amending condition to remove the living wall from the proposal and to require the reconfiguration of the rear curtilage area to secure significant and appropriate soft landscaping.

6.11 Other Issues

Whilst a resident has raised objection to the potential for noise, disturbance and dust from construction works on health and amenity grounds, this is not a valid reason to withhold permission. In imposing a restriction on hours of noisy building works, the City Council seeks to strike a balance between the timely completion of works and the protection of resident's amenities.

7. Conclusion

The proposal is considered acceptable in design and conservation and amenity terms, subject to conditions (including amending conditions). However, the Committee's views are sought regarding the acceptability of the loss of the social and community floorspace and whether notwithstanding the inadequacy of the marketing, the policy presumption to retain a social and community use on the site can be replaced by a financial contribution of £150,000 (index linked and payable on commencement of development) towards an appropriate community and cultural project in the St. John's Wood Ward on the basis that there is currently insufficient evidence of a demand for social and community uses in the area.

BACKGROUND PAPERS

1. Application form
2. Email from Thames Water dated 30.01.2015
3. Memo from Environmental Health Consultation Team dated 24.04.2015
4. Memo from Go Green Programme Manager dated 29.01.2015
5. Memo from Cleansing Manager dated 02.02.2015
6. Memo from Building Control dated 09.02.2015
7. Memo from Arboricultural Manager dated 17.02.2015
8. Memo from Highways Planning Manager dated 24.04.2015
9. Email from St John's Wood Society dated 11.03.2015
10. Emails from the occupier of The Cottage, Greenberry Street dated 03.03.2015, 04.03.2015, 07.03.2015 (x 3), 15.03.2015
11. Email from the occupier of 4 Heron House, Barrow Hill Estate, Newcourt Street dated 03.02.2015
12. Email from the occupier of Flat 39, Hanover House, St John's Wood Road dated 05.02.2015

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT OR WISH TO INSPECT ANY OF THE BACKGROUND PAPERS PLEASE CONTACT SARAH WHITNALL ON 020 7641 2929 OR BY E-MAIL – swhitnall@westminster.gov.uk

DRAFT DECISION LETTER

Address: St John's Wood Police Station , 20 Newcourt Street, London, NW8 7AA

Proposal: Three storey rear link building and two storey rear extension and associated external alterations in connection with conversion of former St John's Wood Police Station to residential (Class C3) comprising 2x1 bedroom; 3x2 bedroom, 2x3 bedroom and 1x4 bedroom flats.

Plan Nos: 891/60;61;62;63;64;65; John Hough limited Design and Access Statement Turley letter 03.12.2014; Turley Heritage Statement December 2014; JS Lewis Ltd Sunlight and Daylight Report November 2014; Newcourt Property Holdings/Oakley Hough Ltd Sustainability/Energy Statement 07th November 2014; Knight Frank Marketing Report 13 October 2014; Schedule of Areas.

Case Officer: Sarah Whitnall

Direct Tel. No. 020 7641 2929

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 You must carry out any building work which can be heard at the boundary of the site only:

- * between 08.00 and 18.00 Monday to Friday;
- * between 08.00 and 13.00 on Saturday; and
- * not at all on Sundays, bank holidays and public holidays.

Noisy work must not take place outside these hours. (C11AA)

Reason:

To protect the environment of neighbouring residents. This is as set out in S29 and S32 of Westminster's City Plan: Strategic Policies adopted November 2013 and ENV 6 of our Unitary Development Plan that we adopted in January 2007. (R11AC)

- 3 Pre Commencement Condition

You must not start work until we have, notwithstanding the approved drawings, approved detailed drawings showing the following alteration(s) to the scheme :-

- 1) Omission of the green wall to the flank wall on Greenberry Street.
- 2) Reconfiguration of the rear curtilage area to incorporate the following:-
 - a) Relocation of the refuse and recycling storage away from the boundary with The Cottage.
 - b) Relocation of cycle storage away from the boundary with The Cottage and redesigned to be secure and weatherproof.
 - c) Significant increase in soft landscaping.
- 3) Revised design to incorporate the following:-

- a) Entrance doors to be four panel doors.
- b) Railings of more traditional design and less utilitarian and with plinth to ground floor level.
- c) Alteration to two storey rear projection to a height of no more than 7m and so as not to overlap the original building.
- d) Entrance gate to Greenberry Street to retain its gate piers and of a more simpler gate design and annotated to state no solid backing to gate.
- e) Covering of lift shaft with lead.

4) Revised basement plan to show subterranean carlift.

You must then carry out the work according to the approved drawings and where relevant retain them in situ thereafter. (C26UB)

Reason:

To make sure that the appearance of this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area and to ensure that the development is not detrimental to residents amenities. This is as set out in S25, S28 and S29 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1, DES 5, DES 6, DES9, ENV13 and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 4 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 this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area. This is as set out in S25 and S28 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1 and DES 5 or DES 6 or both and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 5 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 any work on these parts of the development until we have approved what you have sent us. You must then carry out the work using the approved materials. (C26BC)

Reason:

To make sure that the appearance of this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area. This is as set out in S25 and S28 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1 and DES 5 or DES 6 or both and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 6 You must apply to us for approval of a sample panel of brickwork which shows the colour, texture, face bond and pointing. You must not start work on this part of the development until we have approved what you have sent us. You must then carry out the work according to the approved sample. (C27DB)

Reason:

To make sure that the appearance of this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation

Area. This is as set out in S25 and S28 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1 and DES 5 or DES 6 or both and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 7 All new outside rainwater and soil pipes must be made out of metal and painted black. (C27HA)

Reason:

To make sure that the appearance of this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area. This is as set out in S25 and S28 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1 and DES 5 or DES 6 or both and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 8 You must apply to us for approval of detailed sections through all new joinery (including doors and windows). You must not start work on this part of the development until we have approved what you have sent us. You must then carry out the work according to the approved details.

Reason:

To make sure that the appearance of this unlisted building of merit is suitable and that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area. This is as set out in S25 and S28 of Westminster's City Plan: Strategic Policies adopted November 2013 and DES 1 and DES 5 or DES 6 or both and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R26BE)

- 9 You must apply to us for approval of details including manufacturing specification (including operational details to confirm car lift will revert to subterranean position when not in operation) and acoustic details of the following parts of the development -

- a) Mechanical Car lift.
- b) Vehicular and pedestrian access gates.

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 approved details. (C26DB)

Reason:

To safeguard the amenity of occupiers of noise sensitive properties and the area generally by ensuring that the 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 S32 of Westminster's City Plan: Strategic Policies adopted November 2013 and ENV 6 and ENV 7 of our Unitary Development Plan that we adopted in January 2007.

- 10 The design and structure of the development shall be of such a standard that it will protect residents within it from existing external noise so that they are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night.

Reason:

As set out in ENV6 (4) of our Unitary Development Plan that we adopted in January 2007, and the related Policy Application at sections 9.84 to 9.87, in order to ensure that design, structure

and acoustic insulation of the development will provide sufficient protection for residents of the development from the intrusion of external noise.

- 11 The design and structure of the development shall be of such a standard that it will protect residents within the same building or in adjoining buildings from noise and vibration from the development, so that they are not exposed to noise levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night.

Reason:

As set out in ENV6 of our Unitary Development Plan that we adopted in January 2007, and the related Policy Application at section 9.76, in order to ensure that design, structure and acoustic insulation of the development will provide sufficient protection for residents of the same or adjoining buildings from noise and vibration from elsewhere in the development.

- 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 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 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 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.

Reason:

Because existing external ambient noise levels exceed WHO Guideline Levels, and as set out in ENV 6 (1), (6) and (8) and ENV 7 (A)(1) of our Unitary Development Plan that we adopted in January 2007, so that the noise environment of people in noise sensitive properties is protected, including the intrusiveness of tonal and impulsive sounds; and as set out in S32 of Westminster's City Plan: Strategic Policies adopted November 2013, 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.

- 13 Pre commencement condition. You must not start work until we have approved a revised energy strategy to show that the development will achieve no less than 35% on-site regulated CO2 reduction on 2013 Building Regulations. All measures, required space and equipment shall be installed and operational prior to the first occupation of the development and all equipment shall be maintained and in situ thereafter.

Reason:

To make sure that the development affects the environment as little as possible, as set out in S28 and S40, of Westminster's City Plan: Strategic Policies adopted November 2013 and to comply with policies 5.2,5.3,5.5,5.6 and 5.7 of the London Plan. (R44BC)

- 14 You must apply to us for approval of detailed drawings of a hard and soft landscaping scheme, on the basis of the revised layout of the courtyard required under condition 3, 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 what you have sent us. You must then carry out the landscaping and planting within 1 planting season of completing the development (or within any other time limit we agree to in writing).

If you remove any trees or find that they are dying, severely damaged or diseased within 5 years of planting them, you must replace them with trees of a similar size and species. (C30CB)

Reason:

To improve the appearance of the development, to make sure that it contributes to the character and appearance of this part of the St Johns Wood Conservation Area, and to improve its contribution to biodiversity and the local environment. This is as set out in S25, S28 and S38 of Westminster's City Plan: Strategic Policies adopted November 2013 and ENV 16, ENV 17, DES 1 (A) and paras 10.108 to 10.128 of our Unitary Development Plan that we adopted in January 2007. (R30CD)

- 15 You must provide each car parking space shown on the approved drawings and each car parking space shall only be used for the parking of vehicles of people living in the residential part of this development. (C22BA)

Reason:

To provide parking spaces for people living in this residential development as set out in STRA 25 and TRANS 23 of our Unitary Development Plan that we adopted in January 2007. (R22BB)

- 16 You must provide each cycle parking space shown on the approved drawings (on the basis of the revised layout of the courtyard approved under condition 3) prior to occupation. Thereafter the cycle spaces must be retained and the space used for no other purpose without the prior written consent of the local planning authority.

Reason:

To provide cycle parking spaces for people using the development as set out in TRANS 10 of our Unitary Development Plan that we adopted in January 2007.

- 17 You must provide the waste store on the basis of the revised layout of the courtyard approved under condition 3, before anyone moves into the property. You must clearly mark it and make it available at all times to everyone using the building. You must store waste inside the property and only put it outside just before it is going to be collected. You must not use the waste store for any other purpose. (C14DC)

Reason:

To protect the environment and provide suitable storage for waste as set out in S44 of Westminster's City Plan: Strategic Policies adopted November 2013 and ENV 12 of our Unitary Development Plan that we adopted in January 2007. (R14BD)

Informative(s):

- 1 In dealing with this application the City Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies in Westminster's City Plan: Strategic Policies adopted November 2013, Unitary Development Plan, Supplementary Planning documents, 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 Asbestos is the largest single cause of work-related death. People most at risk are those working in the construction industry who may inadvertently disturb asbestos containing materials (ACM_s). Where building work is planned it is essential that building owners or occupiers, who have relevant information about the location of ACM_s, supply this information to the main contractor (or the co-ordinator if a CDM project) prior to work commencing. For more information, visit the Health and Safety Executive website at www.hse.gov.uk/asbestos/regulations.htm (I80AB)
- 3 The sound insulation in each new unit of a residential conversion should meet the standards set out in the current Building Regulations Part E and associated approved documents. Please contact our District Surveyors' Services if you need more advice. (Phone 020 7641 7240 or 020 7641 7230). (I58AA)
- 4 If a proportion of the flats within the premises are to be rented following development, under the HMO Licensing Scheme, the building requires an increased level of fire precaution and is subject to the City of Westminster Standards for Multiple Occupation. The applicant should

contact the Residential Proactive Environmental Health Team for information concerning the requirements of the Houses in Multiple Occupation Licensing Scheme Housing Act 2004.

Residential Environmental Health Team
4th Floor East, Westminster City Hall
64 Victoria Street
London SW1E 6QP
www.westminster.gov.uk
Email: res@westminster.gov.uk
Tel: 020 7641 3003 Fax: 020 7641 8504.

- 5 The design and structure of the development shall be of such a standard that the dwelling is free from the 29 hazards listed under the Housing Health Safety Rating System (HHSRS). However, any works that affect the external appearance may require a further planning permission. For more information concerning the requirements of HHSRS contact:

Residential Environmental Health Team
4th Floor East, Westminster City Hall
64 Victoria Street
London SW1E 6QP
www.westminster.gov.uk
Email: res@westminster.gov.uk
Tel: 020 7641 3003 Fax: 020 7641 8504.

- 6 Please make sure that the street number and building name (if applicable) are clearly displayed on the building. This is a condition of the London Building Acts (Amendments) Act 1939, and there are regulations that specify the exact requirements. If you would like more information, you can contact Ray Gangadeen on 020 7641 7064. (I54AA)
- 7 Please contact our Cleansing section on 020 7641 7962 about your arrangements for storing and collecting waste. (I08AA)
- 8 This permission is governed by a legal agreement between the applicant and us under Section 106 of the Town and Country Planning Act 1990. The agreement relates to a financial contribution of £150,000 towards a community and cultural project in the St. John's Wood Ward area (index linked and payable on commencement of development).

Notes:
For gross internal areas refer to separate schedule.

Project:
Proposed Rear Alterations
and Internal Refurbishment of
20 Newcourt Street,
London NW8 7AA

Title: Existing Floor Plans

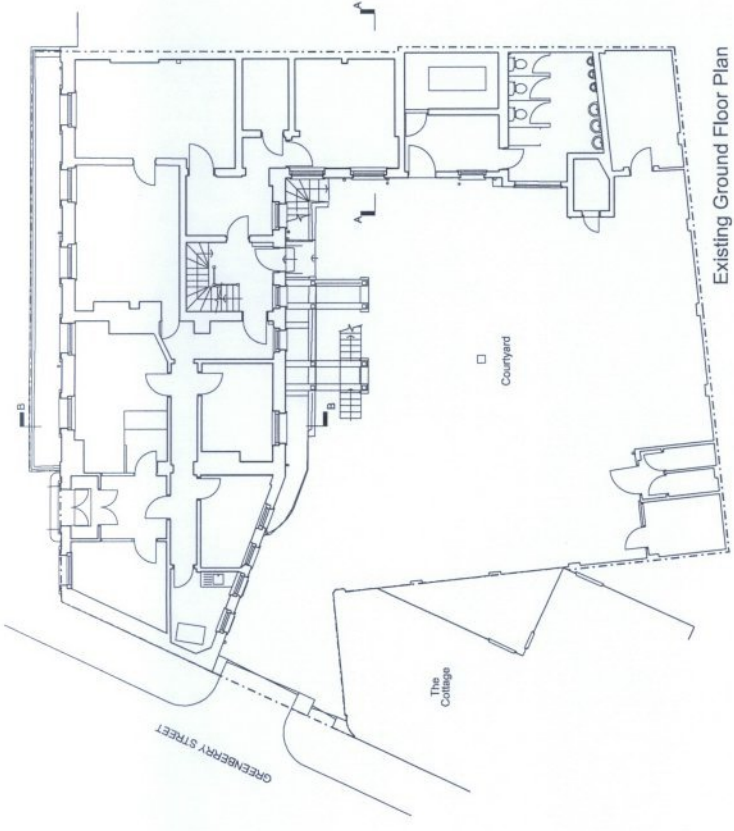
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Date: Oct 2014

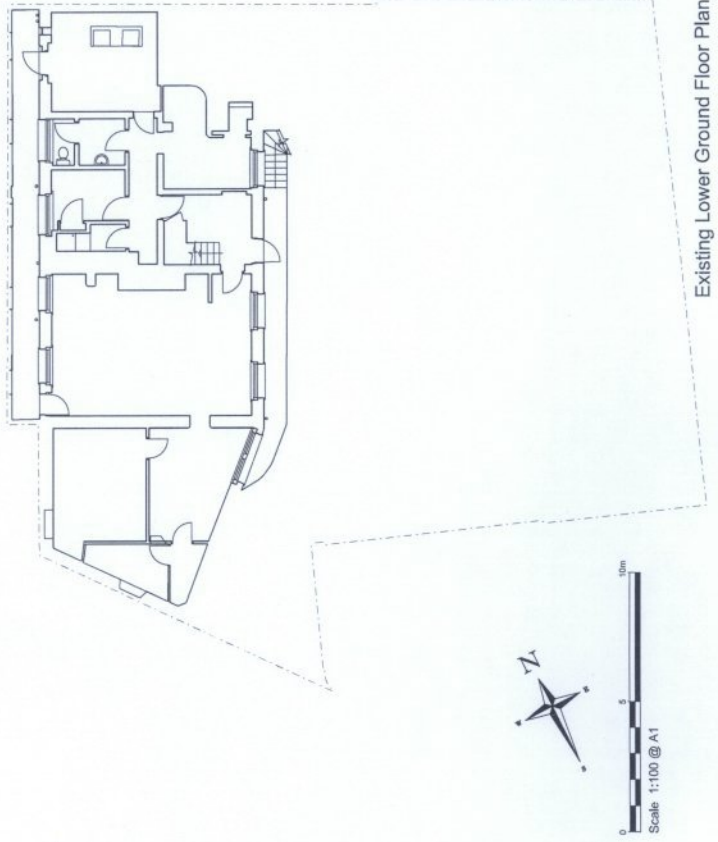
Oakley Hough.

The Barn, Stabling Farm
Fishers Green, Stevenage,
Hertfordshire SG1 2JB
Tel: 01438 745288
Mobile: 07710 546 270
e-mail: john@oakleyhough.co.uk

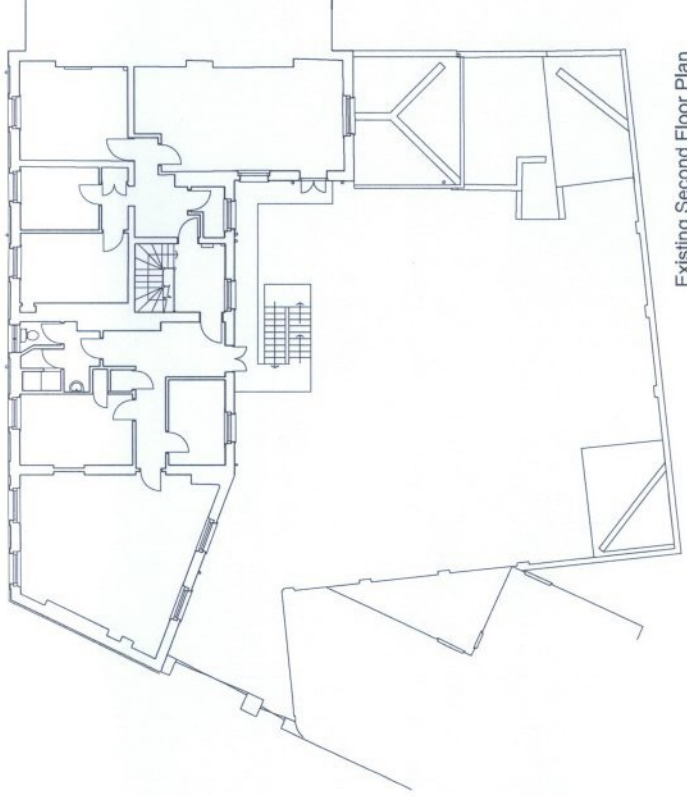
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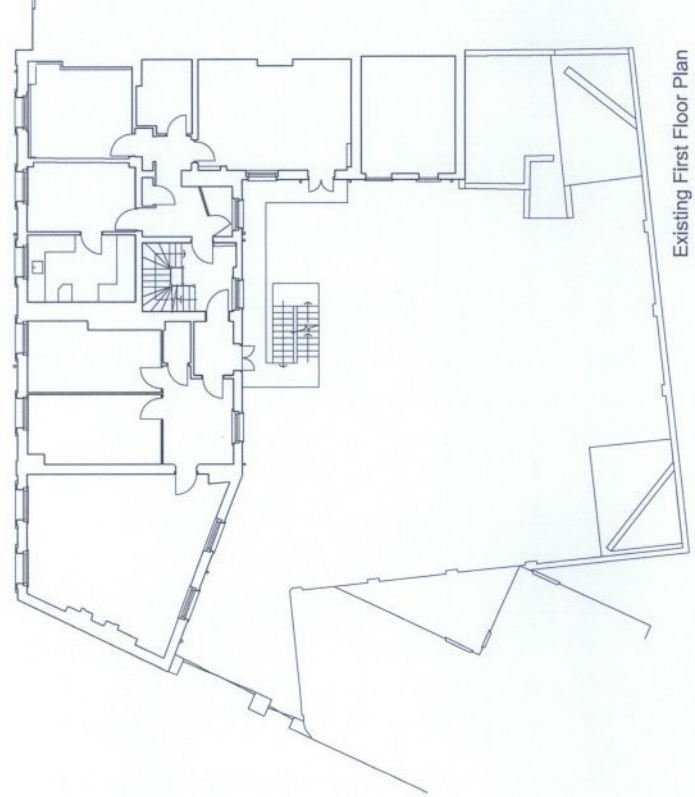
Existing Ground Floor Plan



Existing Lower Ground Floor Plan

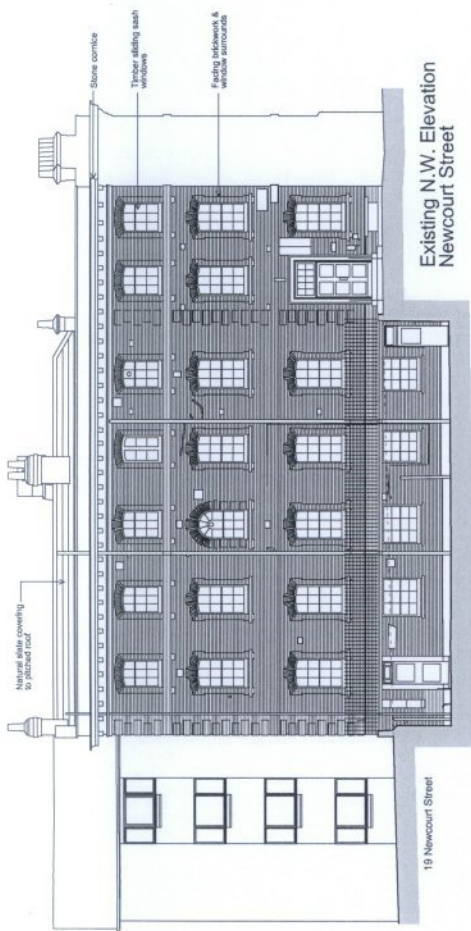


Existing Second Floor Plan

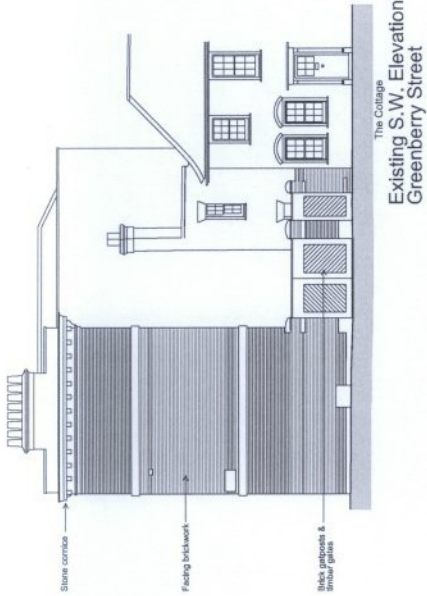


Existing First Floor Plan

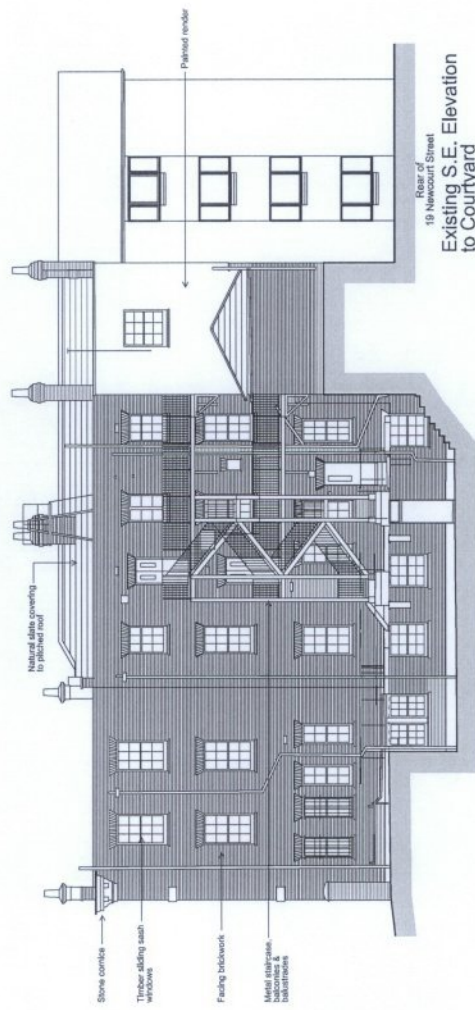
Notes:
For gross internal areas refer to separate schedule.



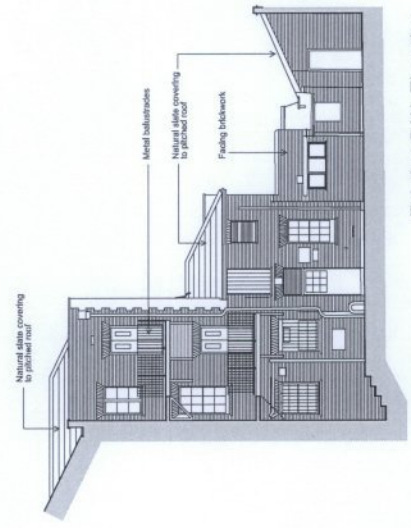
Existing N.W. Elevation
Newcourt Street



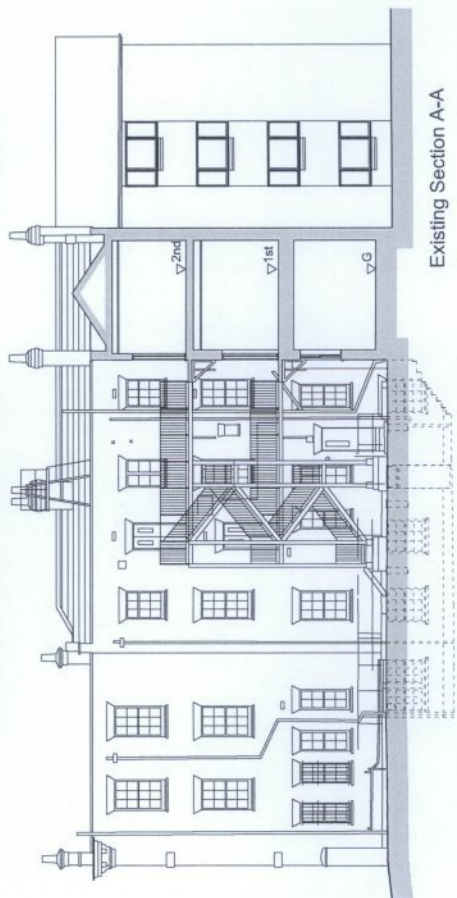
The Cottage
Existing S.W. Elevation
Greenberry Street



19 Newcourt Street
Near of Street
Existing S.E. Elevation
to Courtyard



Existing S.W. Elevation
to Courtyard



Existing Section A-A



Existing Section B-B

Project:
Proposed Rear Alterations
and Internal Refurbishment of
20 Newcourt Street,
London NW6 7AA

Title: Existing Elevations
and Sections

Scale: 1:100 @ A1
Date: Oct 2014

Oakley Hough.
The Barn, Stebbing Farm
Fishers Green, Stevenage,
Hertfordshire SG1 2JB
Tel: 01438 745288
Mobile: 07710 549 270
e-mail: john@oakleyhough.co.uk

Drawing Number:
891/61

Notes:
For gross internal areas refer to separate schedule.



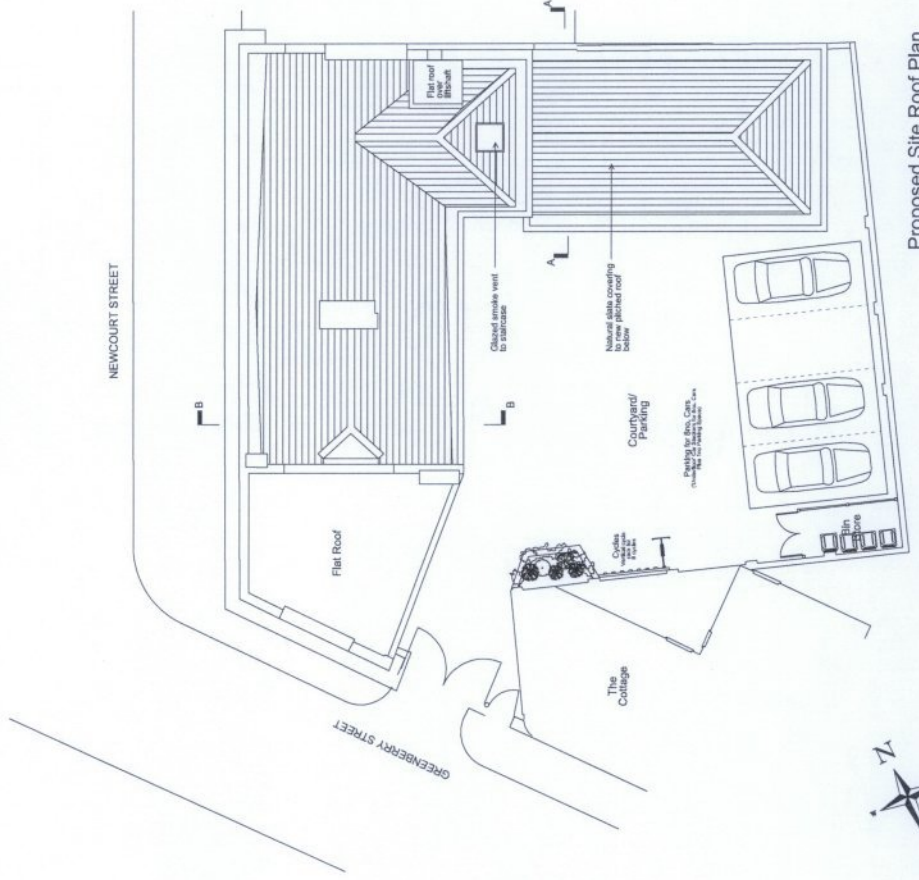
Site Location Plan

Scale 1:1250



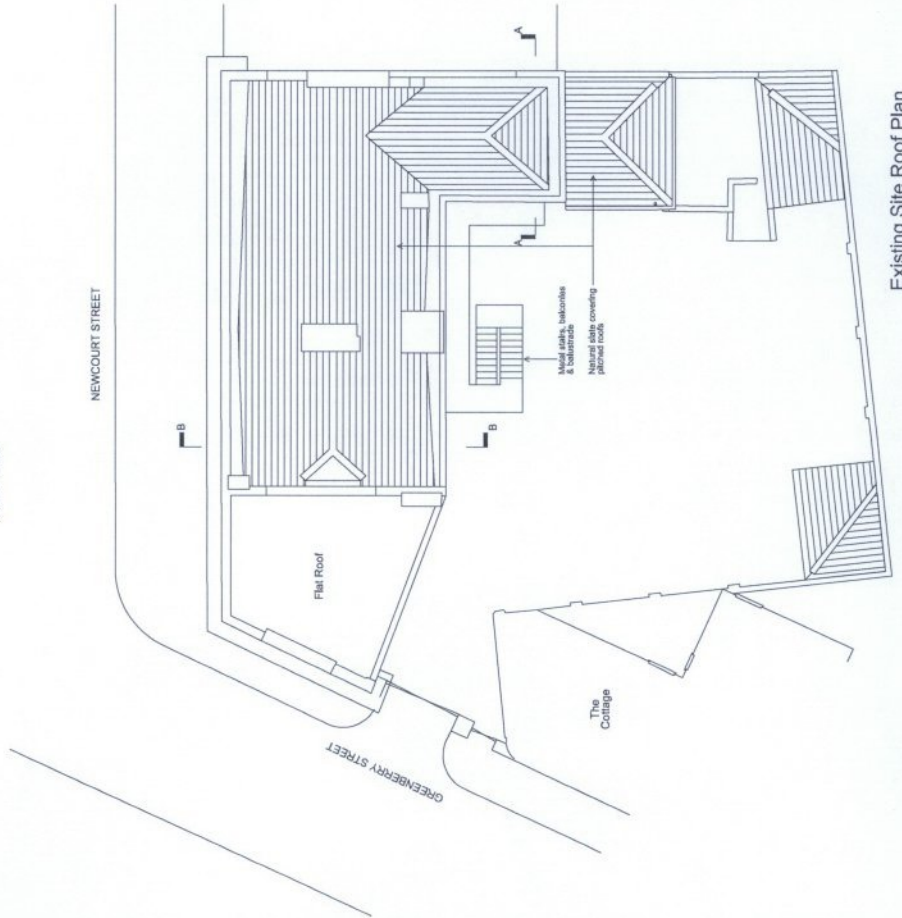
Block Plan

Scale 1:500



Proposed Site Roof Plan

Scale 1:100 @ A1



Existing Site Roof Plan

Project:
Proposed Rear Alterations
and Internal Refurbishment of
20 Newcourt Street,
London NW6 7AA

Title:
Existing & Proposed
Site/Roof Plans
Block Plan & Location Plan
Scale: 1:100, 1:500 & 1:1250 @ A1
Date: May 2014

Oakley Hough.
The Barn, Stebbing Farm
Fishers Green, Stevenage,
Hertfordshire SG1 2JB
Tel: 01438 745288
Mobile: 07710 546 270
e-mail: john@oakleyhough.co.uk

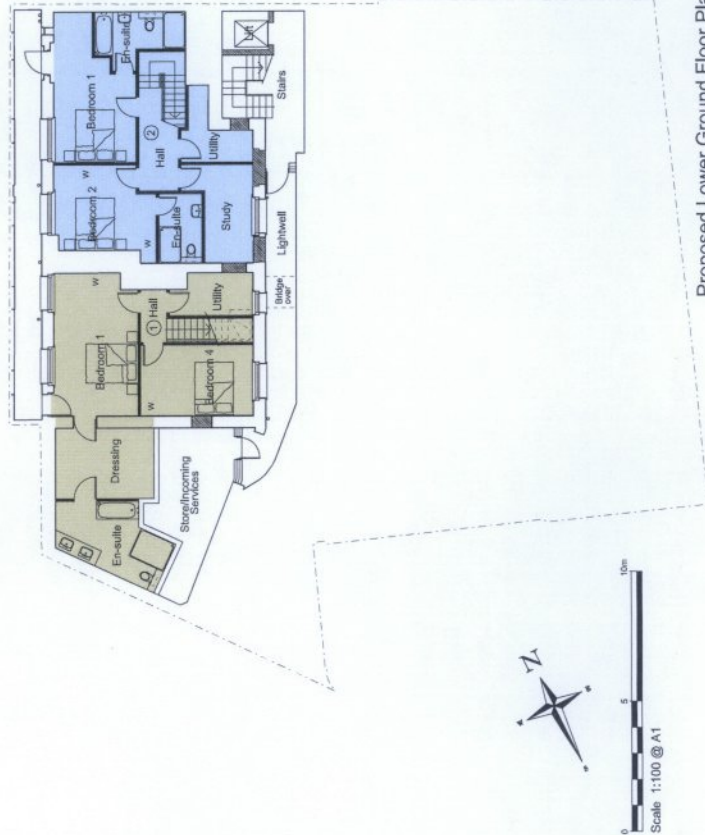
Drawlist Number: 891/64

Notes:
For gross internal areas refer to separate schedule.

- Key:**
- Insulated external masonry cavity walls
 - Insulated external masonry cavity walls (to match existing where applicable)
 - Walls to be replaced
 - Walls to be replaced - Using WAF (or Tracoco)



Proposed Ground Floor Plan



Proposed Lower Ground Floor Plan



Proposed Second Floor Plan



Proposed First Floor Plan

Project:

Proposed Rear Alterations and Internal Refurbishment of 27 Newnham Street, London NW6 7AA

Title: Proposed Floor Plans

Scale: 1:100 @ A1

Date: October 2014

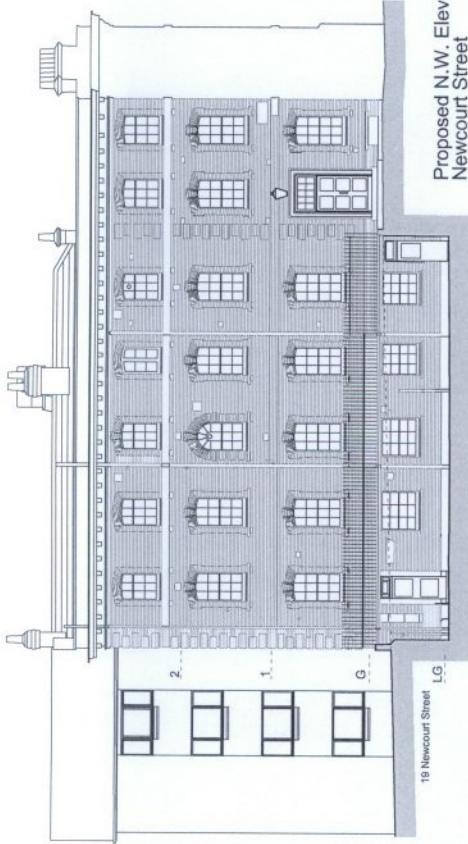
Oakley Hough.

The Barn, Stebbing Farm
Flethers Green, Stevenage,
Hertfordshire SG1 2JB

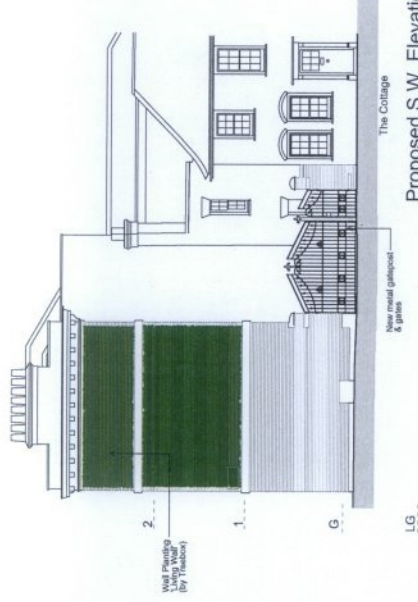
Tel: 01438 746298
Mobile: 07710 549 270
e-mail: john@oakleyhough.co.uk

Drawing Number: 891/62

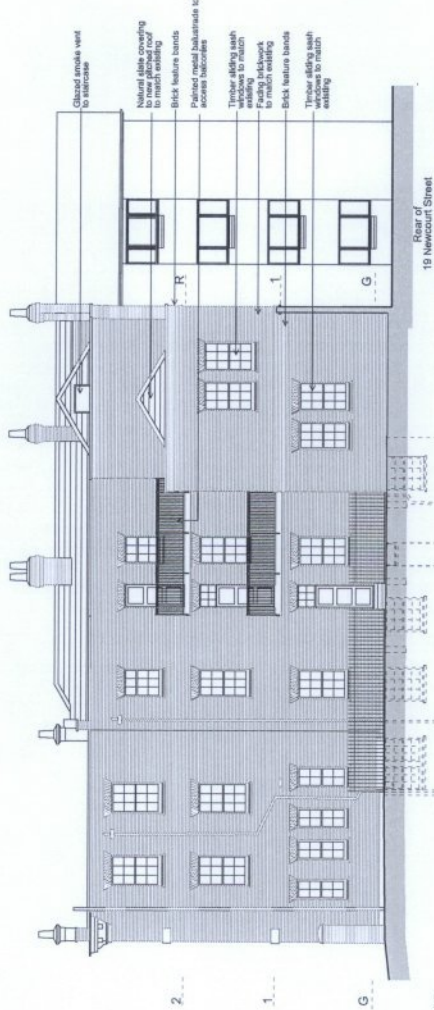
Notes:
For gross internal areas refer to separate schedule.



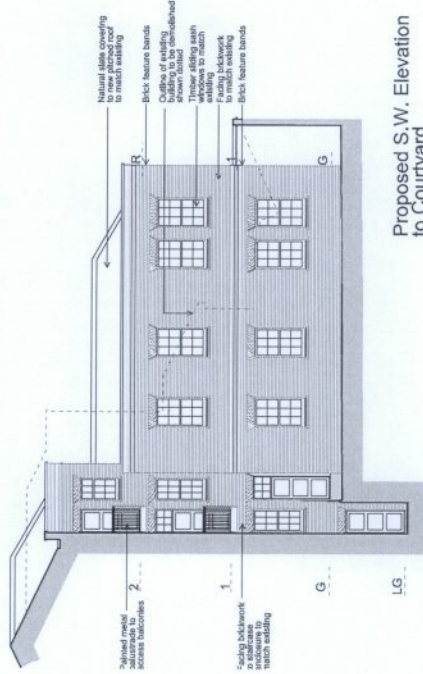
Proposed N.W. Elevation
Newcourt Street



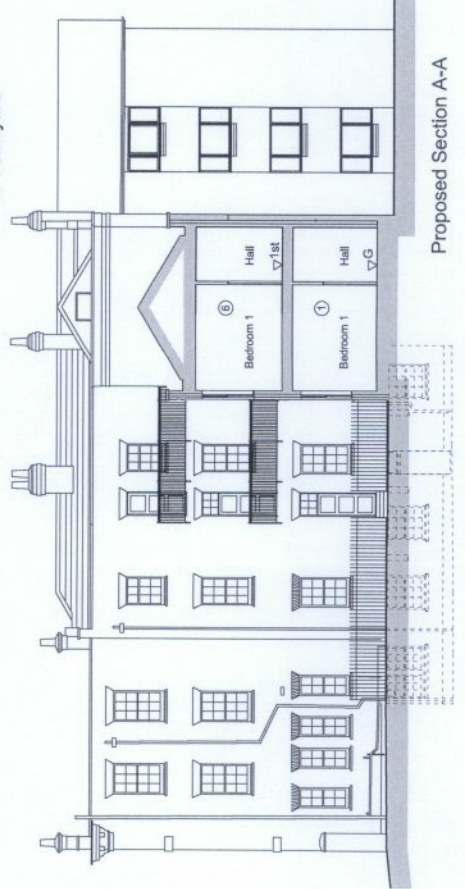
Proposed S.W. Elevation
Greenberry Street



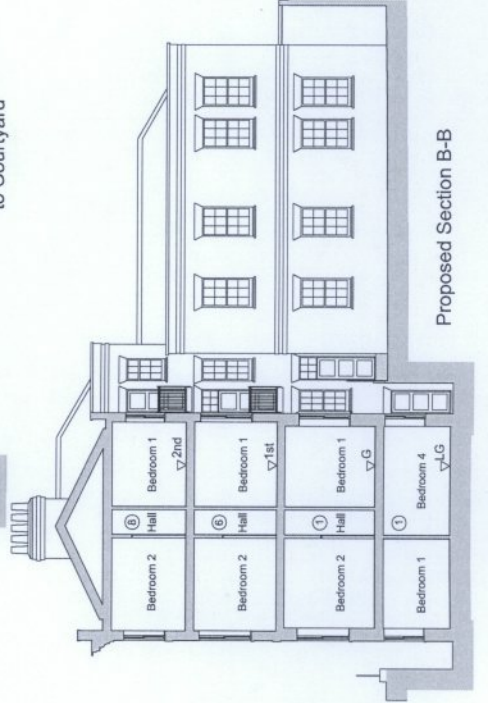
Proposed S.E. Elevation
to Courtyard



Proposed S.W. Elevation
to Courtyard



Proposed Section A-A



Proposed Section B-B

Project: Proposed Rear Alterations
and Internal Refurbishment of
20 Newcourt Street,
London NW8 7AA

Title: Proposed Elevations
and Sections

Scale: 1:100 @ A1

Date: Oct 2014

Oakley Hough.

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e-mail: john@oakleyough.co.uk

Drawing Number: 891/63





