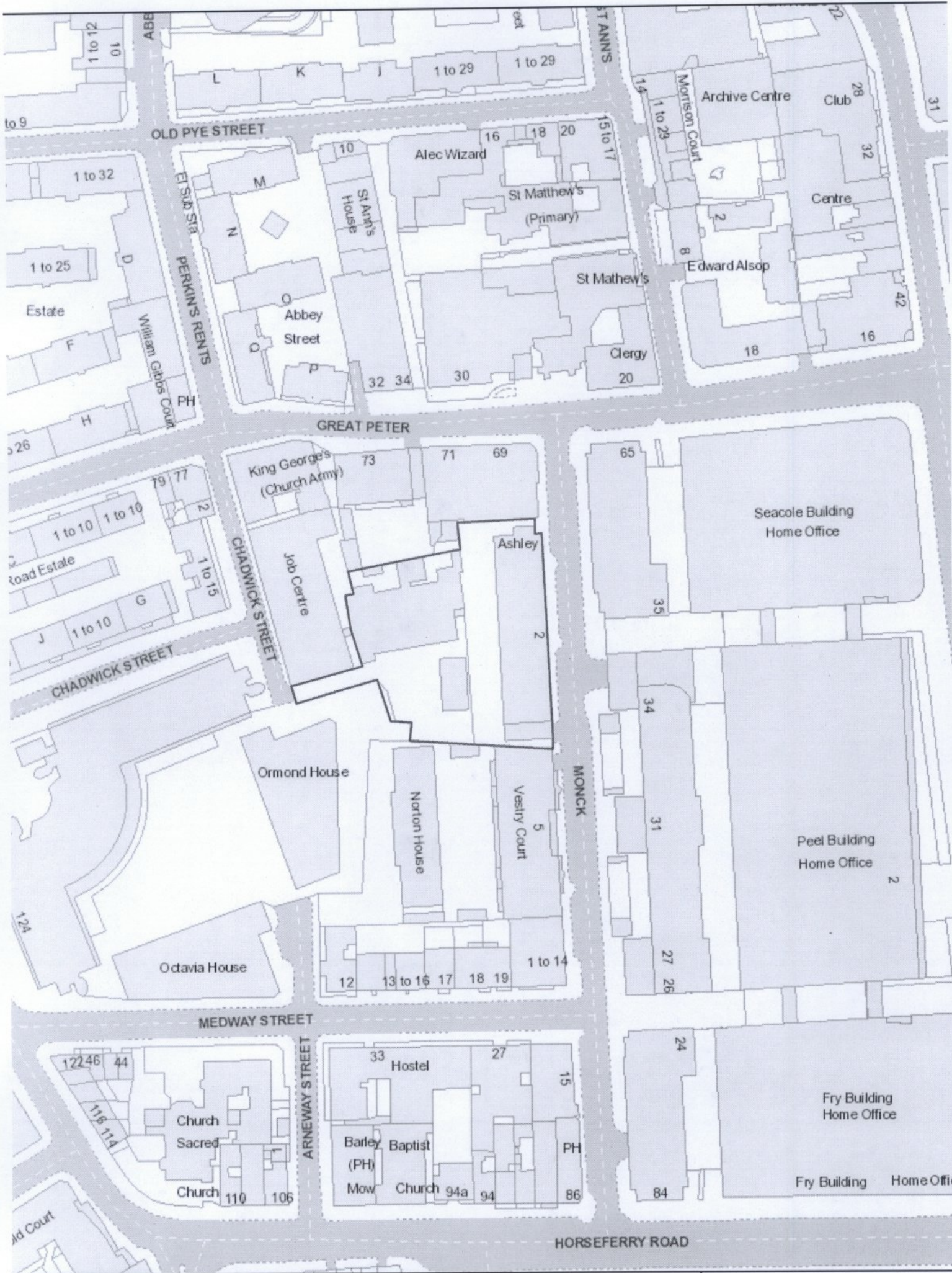


CITY OF WESTMINSTER			
PLANNING APPLICATIONS COMMITTEE	Date 14 October 2014	Classification For General Release	
Report of Operational Director Development Planning		Wards involved St James's	
Subject of Report	1 Chadwick Street and 2 Monck Street, London, SW1		
Proposal	Demolition of existing buildings and erection of two replacement buildings comprising a part eight, part seven storey building and a five storey building to provide a total of 103 residential units above 308m2 commercial floorspace for either A1 (retail), A2 (financial and professional), A3 (restaurant), B1 (office) or D1 (non residential institution) at ground floor level on Monck Street, with associated basement to provide 56 residential car parking spaces and cycle parking spaces and mechanical plant.		
Agent	DP9		
On behalf of	Taylor Wimpey Central London		
Registered Number	14/05687/FULL	TP / PP No	TP/25420
Date of Application	06.06.2014	Date amended/ completed	18.09.2014
Category of Application	Major		
Historic Building Grade	Unlisted		
Conservation Area	Outside Conservation Area		
Development Plan Context - London Plan July 2011 - Westminster's City Plan: Strategic Policies 2013 - Unitary Development Plan (UDP) January 2007	Within London Plan Central Activities Zone Within Central Activities Zone		
Stress Area	Outside Stress Area		
Current Licensing Position	Not Applicable		

1. RECOMMENDATION

Refuse permission - inadequate affordable housing provision.





1 Chadwick Street (Top)
2 Monck Street (Bottom)

1 CHADWICK STREET AND 2 MONCK STREET, SW1

2. SUMMARY

The application site comprises 1 Chadwick Street and Ashley House, 2 Monck Street. A separate application for the redevelopment of Ashley House as a standalone development is considered separately on this agenda.

1 Chadwick Street is a vacant building previously occupied by the Civil Service Sports Council (CSSC) since 1995, and is considered to be a sui generis use. The Civil Service vacated the site in May 2011. The existing building has four storeys and an additional roof storey containing plant. Permission was recently granted for the redevelopment of 1 Chadwick Street as a standalone residential development in June 2014.

Ashley House, 2 Monck Street, is a four storey vacant office building with recessed fifth floor plant room dating from the 1980s.

The site is within the Core CAZ. The predominant neighbouring land use is residential with residential blocks to the south and to the east. Immediately to the north are offices with three flats above at 71 Great Peter Street. The building is not listed and is outside a conservation area.

The key issues with this application are:

- The height and external appearance of the new buildings.
- The level of the affordable housing contribution and viability of the scheme.
- The amenity impact of the proposed buildings on neighbouring properties.
- The level of off street parking provided.

A number of objections have been received to the scheme, principally on design and amenity grounds. The design of the building will be similar to that approved at 73 Great Peter Street and at 1 Chadwick Street and is considered acceptable. The height is considered appropriate to the townscape of Monck Street. The Chadwick Street building has a similar height to that approved in June 2014 albeit there is an additional roof structure to provide access to the roof garden.

Following revisions to the Monck Street elevation, the amenity impact on daylight to flats principally in Monck Street is considered acceptable, given the central London context. The applicant has agreed to unallocated parking which is welcome.

The Council's independent assessment of the applicant's viability case has concluded that the maximum reasonable amount of affordable housing that the scheme can support is 12 on-site affordable units together with a payment in lieu in the region of £2m. The applicant has accepted that the scheme can support 12 on-site affordable units but considers that with an additional payment in lieu the scheme is unviable. The application is therefore recommended for refusal on grounds of inadequate affordable housing provision.

3. CONSULTATIONS

HIGHWAYS PLANNING MANAGER

The ratio of residential units to car parking spaces is 0.55 spaces per unit. The influx of up to 46 extra cars would take the occupancy percentage well over the 80% stress level. A condition is requested to ensure that all residential car parking spaces are unallocated and to secure a car park management plan. In other respects the scheme is acceptable in highways terms subject to recommended conditions.

ENVIRONMENTAL HEALTH

Objects to the provision of remote rooms. Further details are required the ventilation strategy to minimise overheating. Further reports required to demonstrate that mechanical plant and internal noise levels meet adopted policies.

CLEANSING MANAGER

No objection.

GO GREEN MANAGER

No objections subject to conditions to secure the sustainability features set out in the application.

ARBORICULTURAL MANAGER

Concerned about the removal of a Sycamore tree without adequate replacement planting.

ENVIRONMENT AGENCY

The applicant has accurately assessed the risk of flooding and demonstrated that the occupants will have an escape route to the west and into the higher Chadwick Street side of the scheme to protect the occupants from flooding.

WESTMINSTER SOCIETY

No objection. Both schemes are beneficial but the combined scheme offers the better alternative.

THORNEY ISLAND SOCIETY

The proposed urban residential project brings together separate sites and is an overall improvement in planning terms. The scheme proposes a large number of dwellings with shared use of open space and good accessibility throughout the site. Reference is made to the concerns of the Monck Street Resident Owners Association about the height of the Monck Street building, overlooking and loss of light. No objection to the commercial units but would not want to see another supermarket.

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS

No. Consulted: 364; Total No. of Replies: 34 with addresses provided, a further nine letters without an address.

Forty two letters received objecting to the scheme on some or all of the following issues:

Design

- The Monck Street building is too high and out of proportion. It is above the ridge line of Vestry Court.
- The development will give rise to a 'canyon' feel for Monck Street.
- Overdevelopment of the site. The density is over that for Westminster.
- The building design is a bland slab and is not in keeping with the New Palace Place development on the opposite side of Monck Street.
- The internal landscaping will not be visible from Monck Street.
- The four projecting windows will have a jarring effect from street level.
- The Chadwick Street building is taller than the building recently granted planning permission.
- The Chadwick Street site is backland. The height should be reduced and the building separate from the Monck Street development.
- There is a creeping drift to ever higher buildings in the area.

Amenity

- Loss of daylight and sunlight to residential properties.
- Increased overshadowing.

- Increase in noise pollution.
- Overlooking and increased sense of enclosure.
- The joining of 1 Chadwick Street to Ashley House leads to less light and reduced amenity.

Highways

- Car park entrance will increase congestion and noise.

Construction

- Disruption during demolition and construction works including at the weekend.
- Concerns about using Monck Street as entrance during building works.
- Impact on air quality.
- Cumulative environmental impact from building works on other sites.
- The use of Chadwick Street as a construction entrance and permanent vehicular entrance if 1 Chadwick Street is built separately.

Other

- Plans for dealing with commercial waste are unclear.
- Lack of public consultation by applicant.
- Display boards misleading.
- Some rooms in Daylight Assessment are incorrectly assigned.
- Future residents and staff of commercial units will use New Palace Place amenity space with paying for upkeep.

One letter supports the combined scheme for the following reasons:

- It would allow pedestrian only access into Chadwick Street.
- Vehicle access would be from the two-way Monck Street.
- The harmonization of design and building materials across three buildings in Great Peter Street, Chadwick Street and Monck Street would improve appearance of neighbourhood.
- Landscaping can be designed to benefit neighbours.
- Refuse can be collected collectively.

4. BACKGROUND INFORMATION

4.1 The Application Site

The application site comprises 1 Chadwick Street and Ashley House, 2 Monck Street. A separate application for the redevelopment of Ashley House as a standalone development is considered separately on this agenda. Permission was recently granted for the redevelopment of 1 Chadwick Street as a standalone residential development in June 2014 (see Relevant Planning History below).

1 Chadwick Street is a vacant building (sui generis) previously used as a recreation centre by the Civil Service Sports Council (CSSC) and dates from circa 1900. There is also a single storey modern brick constructed outbuilding and surface parking at ground floor level (although this is not marked out as such). The site is an 'island' or 'backland' site as it does not have a frontage on any specific street and sits behind the main frontages of Great Peter Street, Chadwick Street and Monck Street. The site is accessed via a small private access road to the west which links the site with Chadwick Street.

Ashley House, 2 Monck Street is a four storey vacant office building with recessed fifth floor plant room. The building dates from the 1980s and is clad in polished granite. The building has a vehicular entrance at the southern end which leads to surface level parking.

The site is within the Core CAZ. The predominant neighbouring land use is residential with Ormond House, Norton House (a residential care home) and Vestry Court to the south and 65 Great Peter Street and 34 Monck Street to the east on the opposite side of Monck Street. In addition 73 Great Peter Street to the north is under construction as residential flats.

The buildings are not listed nor are they within any conservation area. However, the site is situated close to the Peabody Estates: South Westminster and Westminster Abbey and Parliament Square Conservation Areas to the north. The nearest listed buildings are St Matthew's Church and the Clergy House at 20 Great Peter Street.

4.2 Relevant Planning History

4.2.1 1 Chadwick Street

Permission has previously been granted for the redevelopment of this site. The approved development comprises two replacement buildings with a seven storey building and a five storey building to provide 44 residential units with 27 basement car parking spaces. (26.06.2014)

Permission refused for two replacement buildings comprising an eight storey building and a five storey building to provide 46 residential units with 27 basement car parking spaces. Reason for refusal due to height of the eight storey building which would harm the character and appearance this part of the City. (21.01.2014)

Prior approval granted for the demolition of the building. (4.04.2011)

4.2.2 2 Monck Street

No relevant history.

4.2.3 Site at 73 Great Peter Street

Permission granted at 73 Great Peter Street for erection of eight storey building with either A1 (retail), A2 (financial and professional), A3 (restaurant), B1 (office) or D1 (non residential institution) at ground floor level and 24 residential flats. (28.05.2013). The site is owned by Taylor Wimpey and construction works are well advanced.

5. THE PROPOSAL

The scheme involves the demolition of all buildings on the site and the construction of two new buildings predominantly for residential use. A total of 103 residential units are proposed.

Building A will comprise a part eight storey building facing onto Monck Street and a part seven storey building at the rear facing Chadwick Street to provide 90 flats. The rear part of the building is similar in scale and design to the scheme approved in June 2014. The top two floors of the Monck Street elevation are set back. Four commercial units (308m²) are proposed at ground level on Monck Street to provide either A1 (retail), A2 (financial and professional), A3 (restaurant), B1 (office) or D1 (non residential institution).

The building will have a single basement for 56 car parking spaces with an access ramp off Monck Street. The remainder of the site will be a landscaped deck. The roof of the rear part of the building will provide communal amenity space and photovoltaic panels.

Building B will comprise a five storey building located to the south of Building A and will provide 13 flats. The roof will provide space for photovoltaic panels.

Across the two buildings it is proposed to provide the following mix of residential flats:

Table 1: Mix of Residential Flats

	Studio	1 Bed	2 Bed	3 Bed	Total
No. of units	1	54	20	28	103
Percentage of units (%)	1	52	19	27	100

Table 2 – Height as existing and as proposed

2 Monck Street	
Existing	Height to top of plant screen - 22.07m
Proposed	Height to roof level – 29.150m
1 Chadwick Street	
Existing	Parapet height – 21.58 Set back plant screen – 23.27 Lift over run - 25.85
Proposed	Parapet height – 26.025 Lift over run - 29.150

The application has been revised in response to officer concerns about the amenity impact on residents in Monck Street. Although the overall height of the scheme has not been reduced, the bulk and massing has been reduced through set backs at high level on Monck Street. The amenity considerations of the revised scheme are discussed in more detail in Section 6.3 of this report. The revision has also had an impact on the viability of the scheme and the maximum reasonable amount that the scheme can support. This is discussed in more detail in Section 6.12 of this report.

6. DETAILED CONSIDERATIONS

6.1 Land Use

The June 2014 permission for the redevelopment of 1 Chadwick Street for residential purposes is capable of implementation. The current application again seeks to redevelop the site for residential purposes and is again considered acceptable in land use terms.

The redevelopment of 2 Monck Street will result in a net reduction of 3144m² B1 office floorspace within the Core CAZ. Although the Council does not have policies that specifically protect office floorspace, the economic, social and environmental implications of the proposal should be assessed in the context of the NPPF's presumption in favour of sustainable development.

Policy S47 of Westminster's City Plan; Strategic Policies advises that 'when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework....to secure development that improves the economic, social and environmental conditions in the area.'

The existing office floorspace is dated and is unlikely to meet the requirements of current office tenants. The use of this building for residential purposes is supported by Policies H3 of the Unitary Development Plan (UDP) and S14 of Westminster's City Plan. Given that the scheme will deliver 102 housing units, including on site affordable housing in an environmentally friendly building, the proposal is considered acceptable in land use terms.

6.1.1 Market residential units

The proposed residential units have been designed to meet Lifetime Homes Standards and 10 units have been designed to be easily adaptable to wheelchair accessible standards. This meets the 10% required by policy.

All units have been designed to meet the Mayor's dwelling space standards set out in London Plan Policy 3.5 and the majority of the units will have their own private amenity space in the form of a private winter garden or terrace. In addition, communal amenity space is provided at ground floor and roof level for those units without access to private amenity space. Overall the quality and quantity of private and communal amenity space is considered to be acceptable.

Policy H5 of the UDP seeks a range of housing sizes including 33% of housing units to be family sized. In this case there is a shortfall in family housing as 28 (27%) are proposed. This is similar to the level of family sized units achieved at both 73 Great Peter Street and the approved 1 Chadwick Street scheme. Given that this is only marginally below the policy requirement, it is not considered that a refusal relating to a shortfall in family sized housing would be justified.

The Council's SPG on Planning Obligations states that social/community benefits are required on developments over 50 units. In addition, on site community facilities are sought on large housing developments by Policy H10 of the UDP. In order to address this policy, the applicant proposes to make a financial contribution of £30,000 to the St Andrew's Youth Club at 12 Old Pye Street. This is considered acceptable.

The scheme provides in excess of 25 family units and therefore triggers a requirement for children's play provision under SOC 6 of the UDP. The applicant advises that play spaces are to be provided on the north and south sloping planes of the two mounded forms within the central courtyard. There are play elements with the scheme for young children (4-8 yrs) comprising a balancing feature and a sloping artificial grass lawn within the central courtyard space primarily for toddlers and young children. This is considered acceptable.

6.1.2 Affordable Housing

The new residential floorspace prompts a requirement for the provision of affordable housing under the terms of Policy S16 of the City Plan. The City Plan requires in principle that affordable housing should comprise a proportion of the overall floorspace and is not linked to unit numbers. Prior to the adoption of the City Management Plan, the Council has published an Interim Guidance Note, originally for the purposes of the Public Inquiry into the Core Strategy.

The proposed residential floorspace is 11981m² GEA. Using the calculations set out in the Interim Guidance Note, this requires 25% of the total residential floorspace to be provided as affordable housing. This equates to 2995m² or 37.44 units.

Policy S16 requires the provision of affordable housing on-site. It adopts a 'cascade' approach and states that "where the Council considers that this is not practical or viable, the affordable housing should be provided off site in the vicinity. Off site provision beyond the vicinity of the development will only be acceptable where the Council considers that the affordable housing provision is greater and of a higher quality than would be possible on or off site in the vicinity...". If these options are not feasible, then a financial contribution in mitigation is an appropriate alternative, calculated according to our Interim Affordable Housing Note. A policy compliant payment in lieu is £12,498,803.

The applicant has submitted a viability report that sets out the maximum reasonable amount the scheme can afford in terms of London Plan Policy 3.12. The viability report concludes that the proposed scheme can support of 7 x Affordable Rent units and 5 x Intermediate Rent units

(12 in total) pepper potted around the site arranged as 1 x studio, 7 x one bed and 4 x two bed units.

The City Council's independent consultants (Lambert Smith Hampton) reviewed the findings of the applicant's viability report and concludes that the maximum reasonable amount the scheme can afford is 12 on-site units plus a payment in lieu in the region of £2m. In reaching this conclusion the Council's independent consultant has taken into account the fact that the car parking spaces will be provided on an unallocated basis.

The applicant has advised that an additional payment in lieu on top of the on-site units would render the scheme unviable. Although negotiations between the applicant and the Council's independent consultants are on-going, at this stage it is considered that the applicant has failed to demonstrate that 12 on site units is the maximum reasonable amount of affordable housing that the scheme can support. The application is therefore contrary to Policy S16 of Westminster's City Plan: Strategic Policies, Policy H4 of the UDP and London Plan Policy 3.12.

6.1.3 Ground floor commercial units

The provision of commercial units on the ground floor for either A1 (retail), A2 (financial and professional), A3 (restaurant), B1 (office) or D1 (non residential institution) in the Core CAZ is supported by policies CS20 and CS19 in the Core Strategy. However, a condition is recommended to ensure that the premises are not occupied by a food retail supermarket to protect residential amenity and on grounds of highway safety (see 6.4.1).

The units are small and measure 50m², 53m², 110m² and 95m². The use of a unit A3 restaurant purposes would therefore provide a small unit. Even if two units were combined into one, the maximum size of any restaurant would be 205m² (GEA). It is considered that with appropriate conditions to control opening hours and cooking smells, the proposal would comply with UDP Policy TACE 8 as it would not harm residential amenity.

The D1 floorspace is welcome in terms of CS33 subject to a condition to restrict specific uses that could be harmful to residential amenity or highway safety (e.g. Places of Worship or needle exchange clinic).

6.2 Townscape and Design

Permission has recently been granted for the demolition of the Chadwick Street building. Ashley House forms a long frontage on Monck Street and is not of any particular architectural or historic interest. The redevelopment of this large site offers an opportunity to introduce a new building that will add positively to the townscape.

Objections have been received to the height and bulk of the main body of Block A facing onto Monck Street. This part of the building is eight storeys which is three storeys or approximately 7m taller than the existing building. In order to overcome officer concerns about the amenity impact of this building, the bulk has been reduced at high level through the introduction of greater set-backs. The height, however, remains the same as originally submitted.

In streetscape terms, the parapet line of the new building is set slightly higher than Vestry Court. However, two storey roof levels are commonplace within Monck Street and these recessed floors follow a similar massing to the steep pitched roof of Vestry Court adjoining. The additional set-backs mean that the top two floors will not be easily seen from street level and on this basis the Monck Street elevation is appropriate in height terms and is considered to sit comfortably within the townscape.

The building will be predominantly constructed in buff bricks (similar to those at 73 Great Peter Street and 1 Chadwick Street) with decorative brickwork panels and bronze detailing. The long

street façade is relieved by bronze bays intersecting the brick elevation. The bays will provide vertical emphasis and a rhythm to the façade, breaking down the massing. The projections above the main parapet height have been reduced in height and now extend to fifth floor level. These are an acceptable design feature and reference the gabled bays at Vestry Court next door. The projections extend down to bronze clad piers at ground floor level, which provide structure to the largely glazed ground floor retail frontage and visual support to the upper floors. Further visual interest is provided by inset winter gardens and the use of articulated brick detailing. The rear of the building is based on the same design principles and will be sympathetic to the development approved at 1 Chadwick Street.

The rear of Block A is based on the same design principles as the front part and follows a similar bulk, massing and design to the previously approved Chadwick Street building. The approved Chadwick Street building was a stand-alone development. However, the current scheme extends the building eastwards to connect to the main body of the building facing Monck Street. For this reason the current scheme proposes additional bulk from the recently approved Chadwick Street scheme. The height of this part of Block A has increased by 20cm from that previously approved. This is to ensure uniform levels across the entire site and is not considered significant in the context of the larger development. A roof level garden is proposed on top of the Block A wing, accessed from a centrally located access stair with a small sky lounge. Whilst this further increases the height from that previously approved, given that it is centrally located on the roof it is not considered to have an impact in surrounding views.

The second building (Block B) remains at part five and part three storeys. There is an additional single storey element to the south eastern corner of the building to make up for some of the floorspace lost at roof level on Building A. This is considered acceptable given the overall context of the wider development.

Objections have been received on design grounds. Both Blocks A and B will be predominantly constructed in buff bricks (similar to those used at 73 Great Peter Street) with decorative brickwork panels and bronze detailing. The long street façade is relieved by bronze bays intersecting the brick elevation. The bays will provide vertical emphasis and a rhythm to the façade, breaking down the massing. The projections above the main parapet height have been reduced in height and now extend to fifth floor level. These are an acceptable design feature and reference the gabled bays at Vestry Court next door. The projections extend down to bronze clad piers at ground floor level, which provide structure to the largely glazed ground floor retail frontage and visual support to the upper floors. Further visual interest is provided by inset winter gardens and the use of articulated brick detailing. The rear of the building is based on the same design principles and will be sympathetic to the development approved at 1 Chadwick Street.

The proposed materials and contemporary design are considered an appropriate response to the context, referencing the scheme at 73 Great Peter Street and the approved 1 Chadwick Street scheme. The proposal is considered to be a high quality resolved design which will enhance the local townscape. The comment relating to a creeping drift to ever higher buildings in the area is noted. However, for the reason set out above the height of this development is considered appropriate in townscape terms. As such it accords with the design policies in Westminster's City Plan: Strategic Policies, Unitary Development Plan and the National Planning Policy Framework and is therefore acceptable on design grounds.

6.3 Residential Density

The letters of objection raise a concern about the density of the development. The site has an area of 0.27 hectares equating to a density of 378 residential units per hectare. Within the 103 units proposed, a total of 281 habitable rooms will be provided, equating to a density of 1,040 habitable rooms per hectare.

The application falls within the central area as outlined in Table 3.2 of the London Plan, where an appropriate density range of 650-1,100 habitable rooms per hectare is indicated.

Policy H11 of the UDP also relates to housing density. The policy states that housing development in Zone 1 should conform to 400-850 habitable rooms per hectare. However, the policy also states that proposals for new housing developments that are above the density range for a particular zone may be granted permission if they are close to public transport and open space and meet complementary policies, particularly those relating to townscape and design, residential amenity, off street parking and the desirability of maintaining any special feature of the urban fabric.

The proposal is considered to be acceptable in terms of amenity, design and quality of new housing. This site is located in an area of relatively high density developments and responds well to the urban fabric. The proposed density complies with London Plan Policy 3.4 and is considered to meet UDP Policy H11. A refusal on grounds of overdevelopment is therefore not considered sustainable.

6.4 Amenity

UDP Policy ENV13 seeks to protect existing premises, particularly residential, from a material loss of daylight and sunlight as a result of new development.

The applicant has undertaken a daylight and sunlight assessment in accordance with BRE guidelines for the revised scheme. The windows included in the assessment are flats at 71, 73 and 75 Great Peter Street; Pelham House, 65 Great Peter Street; Bentinck and Ridley Houses, 34 Monck Street; Vestry Court, 5 Monck Street, sheltered accommodation at Norton House and Ormond House, Medway Street. A sunlight assessment has also been carried out with respect to the flats at 71 and 75 Great Peter Street.

The applicant has considered the impact of the additional bulk on the Vertical Sky Component available to these windows. VSC is a measure of the amount of sky visible from the centre point of a window on its outside face. If this achieves 27% or more, the BRE advise that the window will have the potential to provide good levels of daylight. The guidelines also suggest that reductions from existing values of more than 20% should be avoided as occupiers are likely to notice the change.

In terms of sunlight, the BRE guidance states that if any window receives more than 25% of the Annual Probable Sunlight Hours (APSH where total APSH is 1486 hours in London), including at least 5% during winter months (21 September to 21 March) then the room should receive enough sunlight. The BRE guide suggests that any reduction in sunlight below this level should be kept to a minimum. If the proposed sunlight is below 25% (and 5% in winter) and the loss is greater than 20% either over the whole year or just during winter months, then the occupants of the existing building are likely to notice the loss of sunlight. The sunlight assessment concludes that there will be no breach in the BRE guidelines and good levels of sunlight will be maintained.

The tables below show that there will be losses of daylight in excess of that recommended in the BRE guidelines in terms of VSC for 25 windows in 65 Great Peter Street, 12 windows in 34 Monck Street and eight windows for 71 Great Peter Street. There also reductions in daylight distribution for these properties.

Pelham House, 65 Great Peter Street						
Floor level	Window	Existing VSC	Proposed VSC	Window % diff	Room % diff	Room % diff without balconies
First	Living room	12.52	9.38	-25.11	-19.17	
		16.22	12.65	-21.99		
		16.82	13.22	-21.44		
		14.64	13.45	-8.15		
Second	Bedroom	19.10	15.27	-20.02	-20.02	-18.75
Second	Living room	15.86	12.49	-21.26	-21.41	-20.90
		3.08	2.41	-21.56		
Second	Living room	15.60	11.44	-26.68	-20.47	
		19.61	14.96	-23.69		
		20.67	15.95	-22.82		
Third	Living room	9.23	7.35	-20.37	-15.36	
Third	Bedroom	7.97	4.52	-43.25	-43.25	-16.98
Third	Bedroom	24.19	19.19	-20.66	-20.66	-20.00
Third	Living room	20.94	15.84	-24.34	-39.97	-22.19
		7.69	3.41	-55.61		
Third	Living room	19.30	14.01	-27.42	-20.93	
		24.49	18.63	-23.92		
		25.22	19.29	-23.51		
Fourth	Bedroom	30.15	23.97	-20.48	-20.48	
Fourth	Living room	30.07	23.43	-22.08	-22.58	
		30.02	23.09	-23.09		
Fourth	Living room	23.44	17.15	-26.84	-20.61	
		29.04	22.14	-23.78		
		30.18	23.17	23.22		
Fifth	Living room	28.02	21.40	-23.64	-18.35	

34 Monck Street						
Floor level	Window	Existing VSC	Proposed VSC	Window % diff	Room % diff	Room % diff without balconies
First	Living room	6.92	3.06	-55.72	-39.23	-18.93
		15.96	12.33	-22.73		
First	Bedroom	6.88	3.29	-52.17	-52.17	-17.98
Second	Living room	21.08	16.40	-22.19	-32.84	-19.80
		10.70	6.05	-43.49		
Second	Bedroom	19.85	15.46	-22.10	-22.10	-18.83
Second	Living room	10.71	6.39	-40.31	-20.77	-9.09
Third	Living room	15.10	9.38	-37.91	-29.91	-20.04
		24.76	19.34	-21.91		
Third	Bedroom	14.91	9.56	-35.90	-35.90	-19.09
Fifth	Living room	14.87	10.63	-28.46	-20.04	-8.52
		14.01	9.92	-29.22		

71 Great Peter Street						
Floor level	Window	Existing VSC	Proposed VSC	Window % diff	Room % diff	Room % diff without balconies
Four	Bedroom	9.84	1.97	-79.99		-31.72
Four	Bedroom	8.96	1.26	85.94		-34.85
Four	Bedroom	5.29	0.31	94.20		-40.01
Fifth	Kitchen /Living room	35.84	26.99	-24.70	-25.80	
		36.10	26.39	-26.91		
Fifth	Kitchen/ Living room	35.96	25.27	-29.73	-32.43	
		29.14	19.05	-34.63		
		34.93	23.43	-32.94		

The BRE guidelines state that if a room has two or more windows of equal size, the mean of their VSC may be taken. This means that for two living rooms, whilst there are percentage reductions to windows in excess of the BRE recommendations, the overall room complies.

There are average reductions in VSC to living rooms ranging from 29.91% to 39.23% which exceed that recommended in the BRE guidance. However, these living rooms are affected by overhanging balconies which cut out light from the top part of the sky. The applicant has therefore carried out the VSC modelling without the balconies place (in accordance with BRE guidance) to see whether the presence of the balcony rather than the size of the new obstruction was the main factor in the relative loss of light. The VSC calculations show that when the balconies are removed, the percentage difference for the affected room (i.e. not individual windows) is either below or marginally above the 20% reduction permitted under the BRE.

There are reductions in VSC to two ground floor and one first floor window in Ormond House. The reductions of 23.02%, 20.12% and 20.36% are to living rooms and a bedroom. This is marginally above the BRE guidance and the rooms are still left with adequate levels of daylight given this central London location.

One ground floor room within Vestry Court will be detrimentally affected with daylight reducing by 23.41%. However, the light reaching this room's windows is partially obstructed by balconies. Without the balcony the development would only result in a reduction in daylight of 15.59%.

Three windows in Norton House have reductions in excess of the BRE guidance. However, each of these rooms is dual aspect and when the average reduction for the room is taken into account, the reductions are 15.02%, 9.17% and 7.03%. This is within the BRE recommendations.

Conclusions on Daylight

Of the 25 flats considered within 65 Great Peter Street, seven experience VSC reductions below the BRE guidelines. Of the rooms affected within the flats; 4 are bedrooms and seven are living rooms. However, the living rooms are served by multiple windows and two living rooms are affected by overhanging balconies.

Of the 12 flats considered within 34 Monck Street, seven experience VSC reductions below the BRE guidelines. However, all seven flats are obstructed by balconies which hinder the access of light into the rooms.

No. 71 Great Peter Street is mostly in commercial use, however, there are three duplex flats on the top two floors of the building with bedrooms at fourth floor and a bedroom and a kitchen at fifth floor. The fourth floor bedrooms will see reductions beyond the 20% set out in the BRE guidance, however, when the overhanging balconies are taken into account the reductions are not as significant. The rooms at fifth floor level will also see reductions beyond the recommended 20%, however, the room is served by additional windows to the front and will still retain good levels of daylight ranging from 19.05 to 26.99%.

The daylight distribution reductions to two ground floor rooms in Ormond House are marginally above the BRE recommendations of 20.61% and 24.92%.

The applicant has also carried out additional daylight analysis to show the impact on VSC values if an entire middle floor is removed from the Monck Street building. The analysis shows that whilst there would be some improvement in the VSC figures to neighbouring flats, the overall pass rate of 93% is similar to that achieved for the current scheme at 90%.

When the overhanging balconies and presence of multiple windows are taken into account the impact on living room windows and most bedrooms is either within the 20% reduction in daylight permitted by the BRE or marginally above. Given the central London context and overall benefits, the scheme is considered acceptable in terms of daylight.

Sense of Enclosure and Overlooking.

There have been objections on increased sense of enclosure and loss of privacy from the flats within 65 Great Peter Street, 34 Monck Street and from Ormond House.

The submitted drawings show that the separation distance between 65 Great Peter Street and the new building is 12.97m at fifth floor level, 14.78m at sixth floor level and 20m at seventh floor levels. The separation distance between the new building and 34 Monck Street is 22m at fifth floor level, 24m at sixth floor level and 28m at seventh floor level.

The separation distance between the new flats and the existing flats at Ormond House is 15.8 metres at its closest.

The development will change the view from flats within these properties. The Council does not have a policy on minimum window separation distances, however, these separation distances are typical of central London and are considered sufficient to ensure that there will be no significant increase in the sense of enclosure or harm from overlooking to occupants of these flats.

6.5 Transportation

The scheme proposes 56 car parking spaces (including seven spaces for disabled users) for 103 residential flats. This equates to a 54% parking provision. No car parking is proposed for the commercial units.

UDP Policy TRANS23 relates to off-street parking for residential development and states that the Council will normally consider there to be a serious deficiency where additional demand would result in 80% or more of available legal on-street parking spaces. The evidence of the Council's most recent daytime parking survey in 2011 indicates that the parking occupancy within a 200 metre radius of the development site within the day time and night time is 74% and 76% respectively. Although with the addition of Single Yellow Line availability at night, the stress level reduces to 45%.

The Highways Planning Manager acknowledges that the site has a high level of public transport accessibility but considers that the parking ratio proposed would result in up to 46 extra cars parking on the roadway which would take the occupancy threshold well over the

80% mark. Although the applicant has agreed to pay £46,000 to mitigate the potential impact of additional on street parking and provide Lifetime Car Club Membership (25 years) for each unit, the Highways Planning Manager considers that a condition should be attached to the decision notice to require the basement parking to be unallocated. The applicant has agreed to a condition (to be secured through a Car Park Management Plan) but has advised that this affects the overall viability of the scheme in terms of the amount of affordable housing that the scheme can support.

Objections have been received to the location of the car park entrance on Monck Street. It is not considered that the level of car movements associated with this development will cause noise or congestion that would be harmful to residential amenity or highway safety. The proximity of the Tesco store is noted, however, the Highways Planning Manager has raised no concern about conflict with the car park entrance. The new access may require alterations to the existing Traffic Management Order. This can be secured through a legal agreement.

204 cycle parking spaces are provided in the basement for the residential use and a further 8 spaces for the commercial use. This is welcome and satisfies UDP Policy TRANS 10.

6.5.1 Servicing, Refuse and Recycling

Policy TRANS 20 states that the City Council will require convenient access to all premises for servicing vehicles and will, in most cases, require that the servicing needs of authorised development are adequately accommodated on-site and off-street.

For Block A refuse collection will take place from Monck Street. The Cleansing Manager is satisfied with the proposal subject to a condition to require the safety measures outlined in the Transport Statement (to protect refuse collection operatives) are provided and permanently maintained. Prior to collection all commercial waste will be stored within the building.

For Block B It is proposed that refuse collection will take place from Great Peter Street and that the refuse contractors will access Elizabeth Court to collect the bins. Elizabeth Court is accessed via Great Peter Street and runs south between the back of the Job Centre and the application site. The Cleansing Manager is satisfied with the proposed servicing.

It is proposed that servicing for the commercial unit on the ground floor will take place from Monck Street. The Highways Planning Manager does not object to this in principle as this is the same situation as currently exists for the office building. However, objections have been received relating to the servicing implications from the use of the commercial unit by a food retail supermarket. The Highways Planning Manager shares these concerns and in the absence of a robust servicing management plan it is recommended that the applicant is prevented by condition from using any Class A1 retail for food retail purposes. Subject to the use a condition, it is expected that the servicing requirements for the commercial part of the scheme will be lower when compared to the previous use.

6.6 Economic Considerations

The reduction in office floorspace on this site may have local economic implications. However, the occupiers of the 103 flats will generate economic activity which is welcome.

6.7 Access

Level access will be provided to the residential entrance doors. Part M compliant lifts and Lifetime Homes compliant communal stairs will allow access from basement to eight floor levels, allowing access to every flat within the development site and basement amenity areas.

6.8 Other UDP/Westminster Policy Considerations

6.8.1 Construction Impact

The application is accompanied by an Outline Construction Method Statement. This indicates that the site entrance for construction work will largely be from Monck Street. A large number of objections have been received to the construction impact of the scheme, including the cumulative impact from the construction site at 73 Great Peter Street. There is also a letter supporting the use of Monck Street rather than the smaller Chadwick Street for construction access.

The applicant has agreed to sign up to the Council's Code of Construction Practice and to contribute towards the monitoring of the code by the Environmental Inspectorate and the monitoring of noise, dust and air pollution by Environmental Sciences. This will ensure that the impact of construction works is managed and monitored by the council principally for the benefit of local residents and can be secured through a S106 legal agreement. The concerns of residents regarding the cumulative impact of construction works are noted. Whilst it is unfortunate that works may be carried on simultaneously (albeit with appropriate safeguards), a refusal of the scheme for this reason could not be defended at appeal.

Conditions would also be recommended to secure a detailed construction management plan prior to commencement of development and to ensure all construction works audible at the site boundary are only carried out within the following hours: 08.00 and 18.00 Monday to Friday; 08.00 and 13.00 on Saturday; and not at all on Sundays, bank holidays and public holidays.

The use of Monck Street to provide access for construction vehicles is considered acceptable in principle subject to compliance with the construction management plan and working hours condition.

6.8.2 Mechanical Plant

The plant equipment is located within the basement although these will ultimately be vented through ducts at ground floor level. A baseline noise assessment has been carried out and noise parameters suggested for the operation of fixed plant within the development, based on a decibel level of 10dB below existing background noise level at the nearest residential windows.

Environmental Health officers recommend that further noise assessments are carried out once the plant has been selected to demonstrate compliance with the City Council's standard noise condition. It is considered that details of a supplementary acoustic report could be secured by condition.

6.8.3 Overheating

The comments from Environmental Health on this issue are noted. It is the south facing units in Blocks A and B that may be affected by solar gain. It is therefore recommended that a condition secures the submission of an overheating assessment for our approval.

6.9 London Plan

The proposal does not raise strategic issues and does not have significant implications for the London Plan.

6.10 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.

6.11 Planning Obligations

On 6 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; and
- (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 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 the overall delivery of appropriate development is not compromised.

The City Council's Planning Obligations Supplementary Planning Guidance sets out in detail the scope and nature of obligations to which certain types of development will typically be subject.

Had the application had been considered acceptable officers would have recommended the following principal items are secured through a S106 legal agreement:

1. Affordable housing.
2. A parking mitigation payment of £47,000 index linked and payable on commencement of development.
3. Lifetime car club membership (25 years) for each residential unit.
4. Public realm payment of £30,000
5. Payment to St Andrew's Community Centre of £30,000
6. Education payment of £153,038.
7. The applicant to sign up to the Council's Code of Construction Practice and to pay up to £18000pa annually for cost of monitoring by Environment Inspectorate and up to £8,040 annually for cost of monitoring by Environmental Sciences. (index linked)
8. S106 Monitoring contribution.

6.12 Environmental Assessment including Sustainability and Biodiversity Issues

Policy 5.2 of the London Plan refers to Minimising Carbon Dioxide Emissions and states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

City Plan Policy S10 considers renewable energy and states that all major development throughout Westminster should maximise on-site renewable energy generation to achieve at least 20% reduction of carbon dioxide emissions, and where feasible, towards zero carbon emissions, except where the Council considers that it is not appropriate or practicable due to the local historic environment, air quality and/or site constraints.

The application is accompanied by an Energy Strategy which sets out the sustainability credentials of the building and a Code for Sustainable Homes pre-assessment report.

The scheme meets the London Plan target for carbon dioxide emissions through a 41% improvement over 2010 Building Regulations. This is achieved through a high standard of energy efficiency, the provision of a site wide CHP (to include 73 Great Peter Street) and provision of photovoltaic panels. The photovoltaic panels will achieve a 20% reduction of carbon dioxide emissions.

The pre-assessment report for Code for Sustainable Homes indicates that the residential part of the scheme will achieve a Code Level 4 rating. The BREEAM Commercial pre-assessment report indicates that the commercial units will achieve an 'Excellent' rating.

The sustainability features for this development are welcome and the scheme complies with Policy S40 of the City Plan.

6.13 Trees and Landscaping

The exciting sycamore tree which overhangs part of the site is to be retained. As part of the approved scheme from June 2014, the applicant carried out investigations of the tree's rooting system and identified that as there is minimal spread the basement construction will not have a detrimental impact upon the tree. This was previously accepted by the council's Arboricultural Manager.

The indicative landscaping plans show areas of hard and soft landscaping. As the proposed soil depth is not sufficient for the planting of much more than grass, the applicant has confirmed that any trees or shrubs would be planted within large raised planters. Given that the site is currently completely covered in hard standing, this is considered acceptable. It is considered that a landscaping condition could secure an appropriate soft landscaping planting scheme.

6.14 Other Issues

6.14.1 Remote rooms

Environmental Health has raised concerns regarding the provision of remote rooms in the development. This is a matter for Building Control or an approved inspector to assess. However, an Informative could advise the applicant of Environmental Health's concerns.

6.14.2 Statement of Community Involvement

There have been a number of comments in the letters of representation that the consultation carried out by the applicant was inadequate. The Statement of Community Involvement (SCI) submitted with the application advises that activities undertaken as part of the consultation process include:

- A meeting with the Westminster Society and Thorney Island Society.
- Letters sent to approximately 900 local residents and businesses, providing an invitation to a public consultation exhibition.
- A public consultation exhibition held over two days on-site
- Provision of feedback forms at the exhibition.

A summary of feedback received at the exhibition and via the feedback forms was included as part of the SCI. However, this SCI did not include a summary of feedback forms received after the application was submitted to WCC. Following concern by a local resident, an addendum SCI was submitted during the course of the application to address this issue.

The comments made by consultees that the consultation by the applicant was inadequate. However, the SCI is typical of other major developments in the City and is considered to be adequate for the Council to assess the application.

6.14 Conclusion

The proposal is considered acceptable in design terms and will provide additional housing for the City. The Chadwick Street part of the site is similar to that approved by the Council in June 2014. The scheme has been revised to lessen the impact on neighbouring residential units. When the overhanging balconies and presence of multiple windows are taken into account the impact on living room windows and most bedrooms is either within the 20% reduction in daylight permitted by the BRE or marginally above. Given the central London context and overall benefits, the scheme is considered acceptable in terms of daylight. 4. The Council's independent assessment of the applicant's viability case has concluded that the maximum reasonable amount of affordable housing that the scheme can support is 12 on-site affordable units together with a payment in lieu in the region of £2m. The applicant has accepted that the scheme can support 12 on-site affordable units but considers that an additional payment in lieu is unviable. The application is therefore recommended for refusal on grounds of inadequate affordable housing provision contrary to Policy S16 of Westminster's City Plan: Strategic Policies, Policy H4 of the UDP and London Plan Policy 3.12.

BACKGROUND PAPERS

1. Application form.
2. Memorandum from Highways Planning Manager dated 10 July 2014.
3. Memorandum from Environmental Health dated 7 August 2014.
4. Memoranda from Cleansing Manager dated 15 and 14 July 2014.
5. Memorandum from Go Green Manager dated August 2014.
6. Memorandum from Arboricultural Manager dated 29 August 2014.
7. Letter from Environment Agency dated 17 July 2014.
8. Letter from Westminster Society dated 1 July 2014.
9. Letter from The Thorney Island Society dated 31 July 2014.
10. Letter from owner/occupier of 503 Bentinck House, 34 Monck Street dated 18 July 2014.
11. Letter from owner/occupier of 27 Monck Street dated 17 July 2014.
12. Letter from owner/occupier of 603 Bentinck House, 34 Monck Street dated 17 July 2014.

13. Letter from owner/occupier of 64 Ridley House, 35 Monck Street dated 16 July 2014.
14. Letter from owner/occupier of 34 Monck Street dated 18 July 2014.
15. Letter from owner/occupier of 205 Bentinck House, 34 Monck Street dated 15 July 2014.
16. Letter from owner/occupier of 506 Cavendish House, 31 Monck Street dated 15 July 2014.
17. Letter from owner/occupier of Flat 512, 27 Monck Street dated 18 July 2014.
18. Letter from owner/occupier of 501 Bentinck House, 34 Monck Street.
19. Letter from owner/occupier of 60 Ormond House, Medway Street dated 28 July 2014.
20. Letter from owner/occupier of 207 Cavendish House, 31 Monck Street dated 17 July 2014.
21. Letters from Pelham and Ridley Residents' Association dated 17 July and 16 July 2014.
22. Letter from owner/occupier of Flat 41, Ormond House, Medway Street dated 17 July 2014.
23. Letters from owner/occupier of 65 Ridley House, 35 Monck Street dated 16 July 2014.
24. Letter from owner/occupier of 51 Pelham House, 65 Great Peter Street dated 16 July 2014.
25. Letter from owner/occupier of 47 Ridley House, 35 Monck Street dated 16 July 2014.
26. Letter from owner/occupier of 7 Ormond House, Arneway Street dated 16 July 2014.
27. Letter from owner/occupier of 24 Ridley House, 35 Monck Street dated 16 July 2014.
28. Letter from Ormond House Residents' Association dated 16 July 2014.
29. Letter from owner/occupier of 614 Bentinck House, 34 Monck Street dated 16 July 2014.
30. Letter from owner/occupier of 30 Ormond House, Medway Street received 15 July 2014.
31. Letter from owner/occupier of 203 Bentinck House, 34 Monck Street dated 15 July 2014.
32. Letters from owner/occupier of 23 Ormond House, Medway Street dated 15 July 2014.
33. Letter from owner/occupier of Flat 3, Ormond House dated 15 July 2014.
34. Letter from owner/occupier of 47 Octavia House dated 14 July 2014.
35. Letter from owner/occupier of 2 Ormond House dated 15 July 2014.
36. Letter from owner/occupier of 61 Ormond House.
37. Letter from owner/occupier of 17 Ridley House, 35 Monck Street dated 14 July 2014
38. Letter from owner/occupier of 45 Ormond House dated 17 July 2014
39. Letter from owner/occupier of 35 Ormond House dated 15 July 2014
40. Letter from owner/occupier of 12 Ormond House dated 15 July 2014
41. Letter from owner/occupier of 37 Ridley House, 35 Monck Street dated 16 July 2014
42. Letter from L&Q dated 5 July 2014.
43. Letters from New Palace Place Owners' and Residents' Association dated 17 July 2014.
44. Email to Cllr Tim Mitchell dated 21 July 2014.
45. Email to Mr Folger dated 16 July 2014.
46. Email chain from Mr Folger dated 10 July 2014.
47. Email chain from Mr Folger dated 10 July 2014.
48. Letter from owner/occupier of 31 Ormond House.
49. Letter from owner/occupier of 55 Ormond House.
50. Letter from owner/occupier of 47 Ormond House.
51. Letter from owner/occupier of 61 Ormond House.
52. Nine letters without addresses provided.

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT OR WISH TO INSPECT ANY OF THE BACKGROUND PAPERS PLEASE CONTACT MATTHEW MASON ON 020 7641 2926 OR BY E-MAIL – mmason@westminster.gov.uk

DRAFT DECISION LETTER

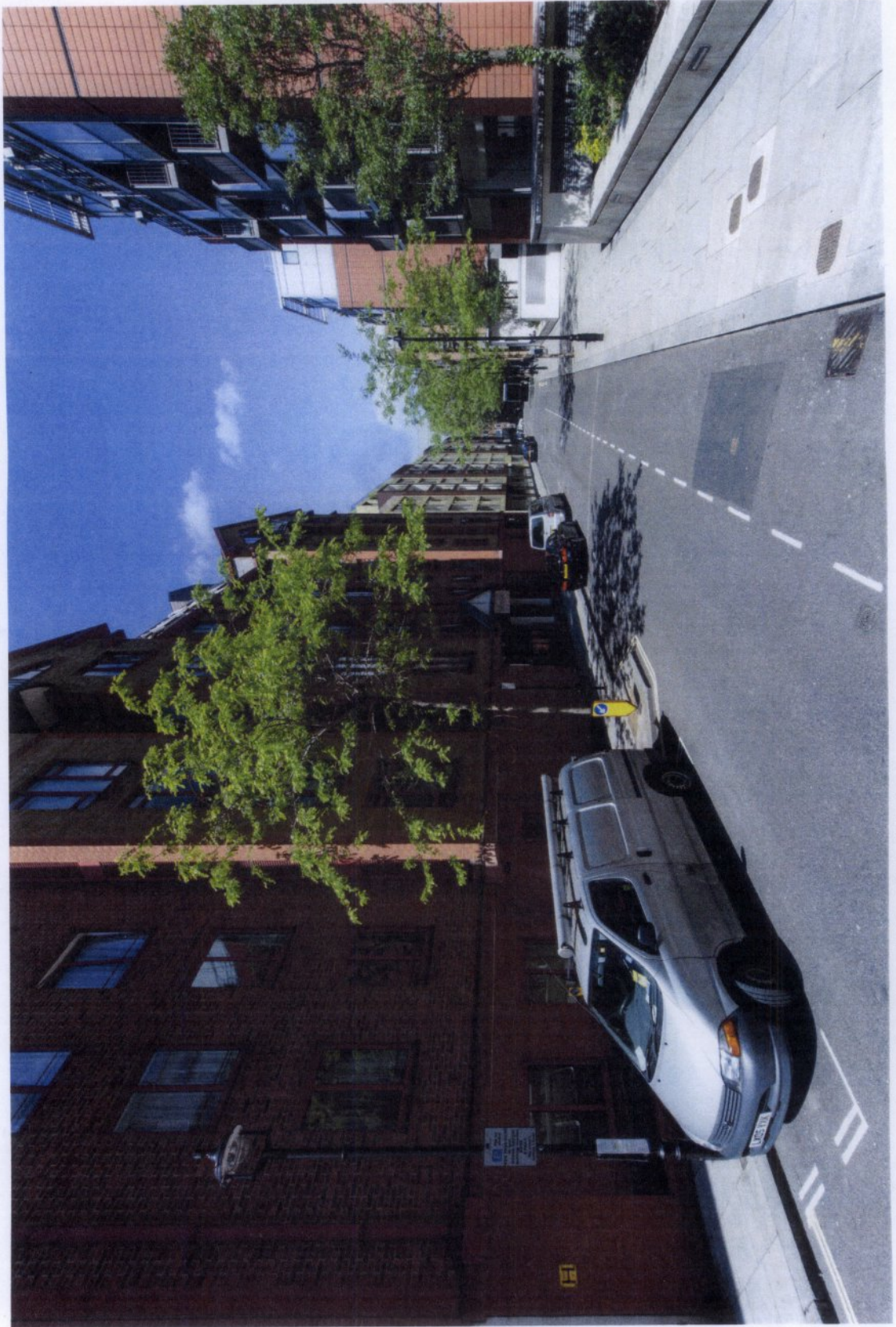
- Address:** 1 Chadwick Street and 2 Monck Street, London, SW1
- Proposal:** Demolition of existing buildings and erection of two replacement buildings comprising a part 8, part 7 storey building and a five storey building to provide a total of 103 residential units above 308m² commercial floorspace for either A1 (retail), A2 (financial and professional), A3 (restaurant), B1 (office) or D1 (non residential institution) at ground floor level on Monck Street, with associated basement to provide 56 residential car parking spaces and cycle parking spaces and mechanical plant.
- Plan Nos:** Site location plan - (01)-P-001.
Existing plans - (01)-P-002, (01)-E-001, (01)-E-002, (01)-E-003, (01)-E-004, (01)-E-005.
Proposed plans - (03)-P-0B0 Rev M, (03)-P-0G0 Rev R, (03)-P-001 Rev L, (03)-P-001 Rev L, (03)-P-002 Rev J, (03)-P-003 Rev J, (03)-P-2-004 Rev J, (03)-P-005, Rev K, (03)-P-006 Rev H, (03)-P-007 Rev I, (03)-P-009 Rev C, (03)-X-004 Rev E, (03)-X-005 Rev B, (03)-X-006 Rev C, (03)-X-007 Rev B, (03)-X-008 Rev C, (03)-E-001 Rev I, (03)-E-001 Rev I, (03)-E-002 Rev A, (03)-E-003 Rev A, (03)-E-004 Rev A, (03)-E-005 Rev A, (03)-E-006 Rev A, (03)-E-007 Rev A. Planning Statement (June 2014), Daylight and Sunlight Study (June 2014 and August 2014), Code for Sustainable Homes Pre-Assessment Report (June 2014), BREEAM Report (June 2014), Statement of Community Involvement (June 2014 and addendum dated July 2014), Energy Report (June 2014), Arboricultural Survey (June 2014), Transport Statement (June 2014), Flood Risk Assessment (June 2014), Extended Phase 1 Habitat Survey (June 2014), Acoustic Report (June 2014), Townscape, Conservation and Visual Impact Assessment (June 2014), Construction Method and Management Plan (June 2014), Landscape report (June 2014). Design and Access Statement (June 2014).
Structural Engineers Design Statement (for information purposes only)
- Case Officer:** Matthew Mason **Direct Tel. No.** 020 7641 2926

Recommended Reason for Refusal:**Reason:**

- 1 The level of affordable housing proposed is inadequate and does not represent the maximum reasonable amount that the scheme can support. The proposal is therefore contrary to Policy S16 of Westminster's City Plan: Strategic Policies adopted November 2013, Policy H4 of the UDP adopted January 2007 and London Plan Policy 3.12 (2011) as amended by Revised Early Minor Alterations (October 2013).



View from Great Peter Street looking down Monck Street



View down Monck Street past Vestry Court towards Great Peter Street



View from Chadwick Street to the communal courtyard



View between the MOD Buildings 1&2 towards Ashley House