

<b>Address:</b> 7-15 Whitfield Street, W1		<b>1</b>		
<b>Application Number:</b> 2005/2739/P	<b>Officer:</b> Alex Bushell			
<b>Ward:</b> Bloomsbury <b>Date Received:</b> 30/06/2005 <b>Proposal:</b> The redevelopment of the site by the erection of a part 4, part 5 storey building with retained basement, for uses comprising 13 self-contained residential units (Class C3), flexible non-residential institutions/community use (Class D1a-e and/or Class D2e), offices (Class B1), and a secondary electricity substation (sui generis), and ancillary facilities including a service bay with retained vehicular access from Whitfield Street, refuse store and cycle parking. <b>Drawing Numbers:</b> Fig. 1 (Location Plan), CP1A, C2, C3, C4, C5A, C6A, E1A, E2A, E3A, E4A, P1A, P2A, P3A, P4A, P5A, P6A, P7A, S1A, S2A, S3A, Sunlight and Daylight Report Ref: IA/LRN/WH09, dated 22/6/5, Pre-Ecohomes Assessment Ref: 41242ELE/103 dated 9/6/5 and Explanatory Statement dated 27/6/5.				
<b>RECOMMENDATION SUMMARY:</b> Grant Planning Permission Subject to a Section 106 Legal Agreement and Conditions				
<b>Related Application</b> <b>Date of Application:</b> 30/06/2005 <b>Application Number:</b> 2005/2742/C <b>Proposal:</b> The substantial demolition of the existing sub-station building. <b>Drawing Numbers:</b> Fig. 1 (Location Plan), C2 and C3		<b>2</b>		
<b>RECOMMENDATION SUMMARY:</b> Grant Conservation Area Consent Subject to Conditions				
<table border="0"> <tr> <td> <b>Applicant:</b>            Artesian Property Partnership            60 Webbs Road            London            SW11 6SE         </td> <td> <b>Agent:</b>            Adrian Salt &amp; Pang Ltd            FAO. Adrian Salt            13A Lanark Road            London            W9 1DD         </td> </tr> </table>			<b>Applicant:</b> Artesian Property Partnership 60 Webbs Road London SW11 6SE	<b>Agent:</b> Adrian Salt & Pang Ltd FAO. Adrian Salt 13A Lanark Road London W9 1DD
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## ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (m²)
Existing	B1	Offices	522
	B8	Depot/Storage	1,044
	SG	Substation	1446
	Total		3,012
Proposed	B1	Offices	1,357
	C3	Residential flats	1495
	D1/D2	Non-residential institution/Community use	1372
	SG	Substation	46
	Total		4,270

Residential Use Details:										
	Residential Type	No. of Habitable Rooms per Unit								
		1	2	3	4	5	6	7	8	9+
Proposed	Flats/maisonette		1	2	10					

39



## OFFICERS' REPORT

Reason for Referral to Committee: The proposal is defined as a 'major' application comprising more than ten residential units and more than 1000m<sup>2</sup> of non-residential floorspace. Any grant of permission would also require the conclusion of a Section 106 Planning Obligation relating to, inter alia, matters outside the normal scheme of delegation. In addition the recommendation includes conservation area consent for the substantial demolition of a building in a conservation area [Clauses 3(i), (v) and (vi)]

Members are advised that the application is one that should be determined within 13-weeks, the expiry of which is 29<sup>th</sup> September 2005.

### 1. SITE

- 1.1 The site is located to the immediate south of the Crabtree Fields area of public open space with a frontage facing Whitfield Street. The south and west boundaries of the site adjoin the rear of buildings facing Windmill Street and Charlotte Street.
- 1.2 The existing building on the site forms part of a substation/depot/office building permitted in 1954, which has been partially constructed. In its existing form, the building is 2/3 storeys high with a higher component facing Whitfield Street, basement and service access road. The 1954 permission is addressed in greater detail in the Planning History section below.
- 1.3 The site is within the Charlotte Street Conservation Area and the UDP-designated Fitzrovia Central London Area. Significant to the application is the Council-approved (2002) Planning Brief relating specifically to the development of the site, which has been further reinforced by the emerging revised UDP as Land Use Proposal Site 41. The adjoining Crabtree fields is designated as public open space in the UDP and there is a listed building to the west of the site facing Charlotte Street (No. 26) and others beyond the park in Colville Place.

### 2. THE PROPOSAL(S)

- 2.1 The application for conservation area consent (2005/2742/C) relates to the substantial demolition of the existing building on the site. All below ground elements comprising the foundation and lower ground floor would be retained.
- 2.2 The planning application for redevelopment (2005/2739/P) proposes a part 4 and part 5 storey building utilising the existing foundation and retaining the basement floor and a similar access arrangement. The front part of the building facing Whitfield Street would be the five-storey component and is proposed as office space, with the flexible D1/D2 use in the basement. The rear part of the building is 4 storeys in height with a 'green' roof, with the D1/D2 on ground and basement floors and 12 residential flats above with a mix of 2x 2-bedroomed units and 10x 3-bedroomed units. In addition, a small two storey 1-bedroomed residential unit is included on the west flank of the proposed building.

### 3. RELEVANT HISTORY



- 3.1 Planning permission was granted in 1954 for the erection of a 5-storey building on the site of 7-15 Whitfield Street and a 6-storey building on 22-26 Whitfield Street for use as a bulk supply electricity substation, depot and offices. The permission was partially implemented by way of the substation and depot with a small office component and could, in theory, be completed and/or further partially implemented at any point in the future. However, one of the buildings in Charlotte Street has since been listed and the conservation area designated. Consequently, the Charlotte Street element cannot be implemented without a grant of conservation area consent for the demolition of the unlisted buildings and listed building consent for the demolition of the listed building. Such consents are unlikely to be forthcoming and the design is from a different era with different technical needs suggesting little likelihood of continued implementation, which would limit the weight that can be attached to the extant planning permission in the determination of the planning application the subject of this report.
- 3.2 Temporary planning permission was granted for the change of use of parts of the basement, ground and first floors as a training school for electrical fitters for a period covering 1967 to 1972.
- 3.3 Two previous incarnations of the scheme have been submitted and subsequently withdrawn following officer negotiation in 2003 and 2004 respectively. The most recent revisions incorporate a reduction in bulk of the rear component by the removal of one floor, design changes to the elevations, the incorporation of a green roof and a change to the proportion of floorspace for the respective uses proposed.

#### **4. CONSULTATIONS**

##### **Conservation Area Advisory Committee**

- 4.1 The **Charlotte Street CAAC** noted the amendments to the previous scheme (withdrawn following negotiations with the applicants), considering that they did not address previously expressed concerns, emphasizing the following objections: the excessive overall scale of the development, the inappropriate horizontal emphasis and use of materials (stone and render inappropriate in a brick area); and the setback of the top floor of the office building, which appears to be an afterthought.

##### **Local Groups**

- 4.2 The **Charlotte Street Association** objects on the following grounds: the developers should not use the extant 1954 permission or existing uses to justify the scale of nature of the development and little weight should be attached by the Council, rather the planning brief and UDP should guide; given the strategic importance of increasing residential use in the Borough and Fitzrovia specifically, the provisions of the Brief and the UDP, residential use should form a larger component of the development and the submitted amount is excessively small; the fact that the residential component falls just below (4.9m<sup>2</sup>) the affordable housing threshold suggests that the proposal has been contrived to avoid the requirement, further compounded by the unspecified nature of the D1/D2 uses in the scheme; the nature of the existing employment use should not justify a lower quantum of residential floorspace on retention of employment space grounds; the scale of the development fails to respect the surrounding townscape and the park, would be overlarge and fail to meet the requirements of the Brief and be detrimental to the character and appearance of the CA and the setting of listed buildings; the



materials and fenestration would be 'rather assertive' and in no way respects the street context; the amount of glazing would cause light pollution and be damaging to birdlife – the park elevation should be blank; loss of amenity to surrounding occupiers by virtue of loss of daylight and outlook, loss of view of the park and light pollution; only limited (balcony) external amenity space is provided in association with the proposed flats; the deficiency of quality open space in the area and the provisions of the Brief suggests this should be an opportunity to extend the open space into the site; and the development would overshadow, dominate and reduce the quality of the open space with negative impact on wildlife.

- 4.3 The **Charlotte Street Association** has also written to the **Greater London Authority** requesting that the application be called in or determined by the Mayor. The Council has been copied in to the reply, which states that the matter is beyond the scope of the GLA control, whilst agreeing that it is disappointing that affordable housing is not provided and more justification about the D1/D2 use would be of benefit.
- 4.4 The **Charlotte Street Association** have also written separately to complain about the sequence of letters notifying residents that the previous application has been withdrawn and the new application – the subject of this report – was submitted for consultation. Further letters were sent to avoid any confusion that may have resulted.
- 4.5 The **Friends of the parks – Fitzrovia** objects on the following grounds: the development does not comply with the Brief as the opportunity has not been taken to improve or extend the open space; the development would increase pressure to use the park, which is already suffering strain in summer months; loss of sunlight and daylight would have a detrimental effect on existing planting and vegetation; loss of amenity for users; light pollution would be damaging to wildlife; and loss of the boundary wall would be detrimental to birdlife habitat.
- 4.6 The **Fitzrovia Neighbourhood Association** objects on the following grounds: loss of light to surrounding residents and users of the park; too little residential use is proposed without regard to the Brief of the character of the area; and the amount of residential is contrived to avoid the requirement for affordable housing.
- 4.7 **Adjoining Occupiers**

<i>Number of Letters Sent</i>	<b>107</b>
<i>Number of responses Received</i>	<b>249</b>
<i>Number in Support</i>	<b>1</b>
<i>Number of Objections</i>	<b>246</b>
<i>Number of comments</i>	<b>2</b>

- 4.8 Of the letters of representation received, 21 originate from residents and businesses in Whitfield Street, seven from Charlotte Street, nine from Colville Place, 19 from Windmill Street and 41 from other addresses in the W1 area. Some residents/businesses have written twice. All other representations have been received from addresses outside the area, many of which are from persons who work in the local area and/or use the park.



- 4.9 Objections cover the following matters: loss of residential/business amenity – sunlight, daylight (one respondent has commissioned a 'right to light' consultation who takes the view that 3x rooms in 33 and 36 Windmill Street would have an unacceptable loss of light), outlook, privacy, noise, view, light pollution and fumes; the building would be too large for the site; the size, design and use of materials is out of character with the surrounding townscape – many respondents refer to the domestic scale and character of Colville Place; construction nuisance, having regard to other development underway in the local area – one respondent is concerned about the impact on local peoples mental health; failure to meet the Brief in respect of the bulk/height, quantum of residential (to also accord with the perceived use character of the area more residential would be preferred) and extension of the park; no affordable/key worker housing is provided; the 1954 permission should not form the basis of an acceptable scheme now; potential for disturbance from certain D1/D2 uses; the D1/D2 uses and the scheme generally would provide no benefit to the community and there is no local need – in respect of the latter two points particular concern is expressed in respect of private gymnasiums/swimming pools; the excessive bulk would give rise to an overbearing physical impact and loss of sunlight (the applicants' sunlight/overshadowing submission is questioned) and daylight to the park, which would be harmful to flora and fauna and reduce the quality of space for all users, particularly having regard to the public money recently invested in its improvement and the lack of green space in the locality; light pollution to park would be harmful to wildlife; the removal of the wall between the park and the site would be harmful to bird habitats and would increase overlooking and the proposed boundary adjacent to the children's play area would be dominant, harsh and overbearing; increase in traffic and additional parking congestion; increase in waste; loss of 'green space'; the application is not 'markedly dissimilar' to the previous withdrawn scheme; there are misleading and mistaken points raised in the applicants' supporting statement; the money would be better spent of a nursery school in Regent's Park; the consultation was undertaken while people were on holiday; 'the local black cat would turn from friendly to spooky!'; and an objector would prefer the development to take place in E14 'rather than Georgian London'.
- 4.10 **The Rt Hon Frank Dobson MP** objects to the development on grounds of the local importance of the park, the overlooking that would result from the higher building, and the reduction in sunlight, which would be detrimental to vegetation and users. Objection is also raised on grounds that, if redeveloped, the scheme should be devoted to housing and include social housing.
- 4.11 The local ward member, **Cllr Penny Abraham**, objects on the following grounds: the land use proposed does not accord with the Brief – residential should be the 'predominant' use. Had the developer incorporated a larger amount of residential, then affordable housing could have been required and the D1/D2 element does not include a social or community use; the bulk is excessive and the developers are 'trying it on' – officers should have negotiated a smaller scheme. The bulk would overshadow and tower over the entire area; the development would have an adverse impact on the park and its users and would not comply with policy EN52. The developers would benefit from the park but provide nothing in return; the excessive glazing would cause light pollution, which would be harmful to wildlife and local residential amenity; the use of stone and glazing is out of keeping with the



brick-built surroundings; and the Councillor requests that the Sub-Committee undertake a site visit before making a decision.

## 5. POLICIES

- 5.1 Set out below are the UDP policies that the proposals have primarily been assessed against, together with officers' view as to whether or not each policy listed has been complied with. However it should be noted that recommendations are based on assessment of the proposals against the development plan taken as a whole together with other material considerations.

### Camden Unitary Development Plan 2000

- 5.2
- RE1 Environmental quality and regeneration (complies);
  - RE2 Residential amenity and environment (complies);
  - RE3 Access for all (complies subject to conditions);
  - RE4 Location of development (complies);
  - RE5 Mixed use development (complies);
  - RE6 Planning obligations (complies);
  - EN1 General environmental protection and improvement (complies);
  - EN4 Providing safe and attractive public spaces (complies);
  - EN5 Noise and vibration (complies);
  - EN6/DS6 Disturbance from plant and machinery (complies);
  - EN7 Noise & disturbance during construction activity (complies subject to S106);
  - EN12 Use of resources (complies);
  - EN13 Design of new development (complies);
  - EN14 Setting of new development (complies);
  - EN15 Landscaping (complies subject to conditions);
  - EN16 Site layout (complies);
  - EN19 Amenity for occupiers and neighbours (complies);
  - EN20 Community safety (complies);
  - EN31 Character and appearance of conservation areas (complies);
  - EN32 Demolition of unlisted buildings in conservation areas (complies);
  - EN52 Development bordering designated open spaces (complies subject to conditions and S106);
  - TR16 Car free housing (complies subject to S106);
  - TR17/DS8 Residential parking standards (complies subject to S106);
  - TR21 Pedestrians (complies subject to S106);
  - TR22/DS7 Cycling (complies subject to conditions);
  - TR23 Facilities and amenity (complies subject to S106);
  - HG5 Mixed use development (complies);
  - HG8 Increasing the amount of residential accommodation (complies);
  - HG11 Affordable housing (complies);
  - HG17/DS5 Visual privacy and overlooking (complies subject to conditions);
  - HG13 Provision of amenity space (does not comply);
  - HG15 Ensuring a range of housing (complies);
  - HG16 Housing mix in schemes for new residential development (complies);
  - SC1 Retention and new provision of Class D1 uses (complies subject to S106);
  - SC2 Location of social and community uses (complies subject to S106);
  - LC2 Location of new provision of leisure and cultural facilities (complies);
  - LC3 Public access to leisure and cultural facilities (complies subject to S106);



CL3 Assessment of applications in the Central London Area (Fitzrovia)  
(complies);

#### **Supplementary Planning Guidance**

- 5.3 Planning Brief No. 33 (complies);  
Charlotte Street Conservation Area Statement (complies);  
Internal arrangements for residential development (complies);  
Community safety (complies);  
Pollution – Noise/construction/plant and machinery/light (complies subject to conditions/S106);  
Car free housing (complies subject to S106);  
Planning obligations (complies);  
Education contributions (complies subject to S106);

### **6. ASSESSMENT**

- 6.1 The principal considerations material to the determination of this application are summarised as follows:

- Land use;
- Design and townscape;
- Impact on public open space;
- Size mix and quality of residential units;
- Residential amenity; and
- Transport and parking.

#### **Land Use**

- 6.2 Residential Use Relevant to the redevelopment of this site is the approved Planning Brief 33 (2002), which acts as supplementary planning guidance and carries significant weight in the determination of the application. The planning brief states that housing should be the 'primary' land use in any proposed mixed-use scheme and that the major land use anticipated is housing. The brief also states that in line with the then emerging draft mixed-use policy the residential element should be at least 35% of the total gross floorspace. The overall quantum of residential floorspace proposed in the application is 1495m<sup>2</sup>, representing a 35% proportion of the scheme. Though the "spirit" or intention of the brief is intended to seek to maximise the amount of housing on the site it can be argued that the proposal technically complies with the wording contained in the brief, as housing would be argued to be "the primary land use"
- 6.3 Members should also be aware that the site is included in the replacement UDP land use schedule (Site 41) with a pre-inquiry change of the preferred use to "residential or mixed use, predominantly residential". However, as there are objections to this entry, it will carry relatively little weight until the UDP inquiry Inspector's report is published, which may not be until 2006.
- 6.4 Protection of Employment Use Whilst the site was identified as a large employment site (over 1000 m<sup>2</sup>) in the 2000 Employment Sites Survey it does not fall within the remit of Policy EC3 of the Adopted UDP as it is a sui generis use. The loss of an employment site anyway is acceptable by virtue of the adopted brief and the site's inclusion in the land use schedule as a site suitable for housing. The



scheme provides more than 50% of the increase on floorspace in the form of housing in compliance with Alt No.2 RE5. Notwithstanding the policy position, it is also noted that significant employment space is included in the form of the office space on the Whitfield Street frontage building and possible 'creative employment use in the ground/basement 'studios'.

- 6.5 The Flexible D1/D2 uses The application includes the flexible use of the basement and ground floors as 'studios' for class D1 and D2 uses. In order to restrict potential uses that may generate a large number of visitors and to minimise the associated negative effects on residential amenity, the applicants have limited the proposal to D1 (a-e) and D2(e), which comprises a range of uses including examples such as: doctor's surgery/medical centre, crèche/day nursery/day centre, training or adult education facility, art gallery, museum, gymnasium or indoor sports facility.
- 6.6 The applicants are proposing the substantial demolition of the existing building – effectively the above-ground structure – and utilising the existing foundation and basement floor for the new building for reason that it would be 'structurally feasible and economically advantageous'. It is submitted that the basement area is 'particularly complex' made up of extensive thick walls and deep beams. The applicants' argue that the form of the retained basement/foundation is such that it has a significant influence on both the physical design and nature of uses within that component of the building. In addition, due to the compartmentalised nature of the basement and lack of natural light, the use of the ground floor in an associated manner is essential to achieve the access required. It is also submitted that the submitted range of D1/D2 uses would partly cater for local community needs.
- 6.7 Some concern has been expressed about both the local need for such uses and the fact that the scheme has been 'contrived' to avoid affordable housing provision. The range of uses proposed would undoubtedly include certain uses that may be of benefit to local residents. It is therefore proposed that the recommended S106 includes provision for community access and use. However, given the flexible nature of the use applied for, a further condition is recommended to require that the basement and ground floor of the Whitfield Street frontage building be used for a purpose that is specifically restricted to uses which may be of benefit to the local community – of the uses proposed by the applicant, the crèche/day nursery/day centre and gymnasium or indoor sports facility would be most appropriate. In addition the applicants have undertaken to provide a financial contribution to the local Fitzrovia Neighbourhood Centre, which is included in the recommended S106. Finally, the applicants' justification set out in para 6.6 above, suggests – having regard to the manner in which the site would be redeveloped – the use of the basement and ground floor for residential purposes is impractical.
- 6.8 Having regard to the foregoing, the mix and proportion of land uses is considered to be acceptable and in compliance with the Brief and adopted UDP policy in that it is proposing a mixed used scheme incorporating 35% residential floorspace as the 'primary' use and including community facilities.
- 6.9 Affordable Housing In pursuance of the aims of securing residential as the 'primary' or 'major' use, the Brief refers to the – then emerging – policy HG11, which required the provision of affordable housing if more than 10 units are



proposed. Since the adoption of the Brief, the policy has been amended and subsequently adopted with a trigger of 15 units. In addition, the Council is further revising the policy as part of the UDP renewal process to specify a floorspace trigger of 1500m<sup>2</sup>. Similar to the reference to site 41 in para 6.3 above, the floorspace trigger should carry limited weight as the matter has outstanding objection yet to be assessed as part of the published UDP inquiry Inspector's report.

- 6.10 As set out in paras 6.2 – 6.8 above, the balance of uses satisfies the terms of the Brief and consequently the residential component does not meet the trigger for affordable housing provision. Whilst the floorspace figure is very close the 1500m<sup>2</sup>, the layout and form of residential units is not overly contrived to include excessively large units, particularly having regard to policy requirements relating to mix of unit sizes and the incorporation of family sized units. Notwithstanding, the Council is keen to ensure that the development now proposed is treated as a whole should future applicants wish to change part of the non-residential floorspace to residential. Consequently provision is included in the recommended S106 to ensure that any future change of use to residential takes into account the quantum of residential on the site already and any additional units (2) or increase in floorspace (5m<sup>2</sup>) would trigger an affordable housing requirement.

#### **Design and Townscape**

- 6.11 The site, being within the Charlotte Street CA, near to listed buildings in Charlotte Street and Colville Place and adjacent to the Crabtree Fields public open space, is significant in townscape terms and any building should be of a high quality design and respect its context. The Brief for the site reinforces this position and sets out a number of additional parameters to be considered, summarised as follows: the existing building does not contribute the character and appearance of the CA and its demolition is acceptable subject to a suitable replacement; the main elevation of the development should face the open space; potential for up to five storeys on the Whitfield Street elevation and the rear stepped down to the rear and exceed no more than three storeys; and the Whitfield Street elevation should have a vertically emphasis in its elevational design.
- 6.12 The proposed scheme largely complies with the Brief in respect of the height and bulk with the front element being 5 storeys and the rear stepped down, although 4 storeys are proposed. Since the previous scheme was withdrawn, one floor has been removed at the north-western end of the site (interfacing with Crabtree Fields) and the volume of the proposed building, above ground and therefore its bulk, has been reduced. Whilst this exceeds the 4-storey Brief requirement, the floor to ceiling heights are lower than the office building to the Whitfield Street side and the overall bulk is considered to respect its context. The frontage onto Whitfield Street has been developed as the more prominent feature of the proposal, reflecting the importance of the commercial element of the development and to emphasise the location of the main entrance, whilst providing a consistent return elevation, that acknowledges the public open space interface - forming a suitable transition between the two abutting facades.
- 6.13 It is considered that the proposed Whitfield Street elevation, accords with the design guidance detailed in the Brief in that it is a building, comparable in height to the adjoining building, which is five storeys. Given that there are no sensitive



boundaries at the front of the site, the proposed setback (approx. 1.9m) of the upper most level, is considered appropriate, reducing its visual prominence. Similarly, the elevational treatment, endorses a more vertical emphasis, by virtue of the fenestration pattern (vertical bays), recessing/modelling and use of materials proposed. It is considered that this elevation will now be of an appropriate scale, encouraging an improved visual character with more appropriate proportions, in keeping with the existing buildings in Whitfield Street.

- 6.14 It is considered that the northern elevation, facing Crabtree Fields, is an important elevation, as it directly interfaces with the open space. The proposal, addresses original concerns raised, that previous schemes, in this regard, were considered too deep, utilitarian/bland or were considered to have an overbearing effect on the adjoining open space. The current scheme introduces building frontages overlooking Crabtree Fields – as required by the Brief, that will improve surveillance of this public space - by replacing the large expanse of flank brick wall, with an elevation of terraces/balconies and suitably scaled window openings, framed in Portland Stone - providing a vertical emphasis, more in keeping with the conservation area. Similarly, the height and setback along the edge of the open space has been amended – proposing a setback of 6.7m for the entire length of the residential part of the building, with the top floor setback a further 1.5 metres (8.2m in total) – providing an appropriate 'breathing space' between the new building and the open space, averting an unnecessary sense of enclosure.
- 6.15 A green sedum roof has been incorporated into the residential component of the scheme. Coupled with the overall reduction in height of this part of the building, the green roof is considered to be a commendable improvement to the visual amenity/outlook for residents to the south. And is considered to be a more appropriate, visual transition with the interfacing open space.
- 6.16 A palette of natural facing materials is proposed, with the predominant material being portland stone. Whilst limited, it is considered that the proposed materials palette (natural portland stone, render, bronze coloured aluminium window frames), is suitably contemporary and somewhat organic, appropriately respecting the site's context. A condition is recommended to ensure materials and detailed finishes would result in a high standard of design.

#### **Impact on Public Open Space (POS)**

- 6.17 In addition to the design/townscape considerations above, the Council must have regard to the relationship between the proposed building and the park, in particular Policy EN52 applies and is reinforced in the Brief. The policy requires that development should not be detrimental to the integrity, appearance and setting of public open space and should not intrude on public enjoyment of the space. In addition, the policy 1 of the Mayor's Draft Biodiversity Strategy seeks to promote the protection of London's wildlife and important species. The site includes important habitat for Starlings and Sparrows, both protected species in their own right (Wildlife and Countryside Act 1981). Finally, the POS is the only space in the CA and is within an area with a general deficiency in green space accessible to the public.
- 6.18 The physical relationship of the building and the POS is already addressed in the townscape considerations above. In addition there is significant local concern that