

<b>CITY OF WESTMINSTER</b>			
<b>PLANNING APPLICATIONS SUB COMMITTEE</b>	<b>Date</b> 3 April 2018	<b>Classification</b> For General Release	
<b>Report of</b> Director of Planning		<b>Ward(s) involved</b> St James's	
<b>Subject of Report</b>	<b>Trevelyan House, 30 Great Peter Street, London, SW1P 2BU</b>		
<b>Proposal</b>	Erection and installation of metal railings and gates around the external frontages of the building for security purposes.		
<b>Agent</b>	Modus Workspace Ltd		
<b>On behalf of</b>	The Embassy of the Republic of Indonesia		
<b>Registered Number</b>	18/00095/FULL	<b>Date amended/ completed</b>	5 January 2018
<b>Date Application Received</b>	5 January 2018		
<b>Historic Building Grade</b>	Unlisted		
<b>Conservation Area</b>	Not within a conservation area.		

## 1. RECOMMENDATION

Refuse permission - townscape/ setting of listed building; and highway safety.

## 2. SUMMARY

The application relates to the Indonesian Embassy on Great Peter Street. The site is not a listed building nor is it within a conservation area, although it is immediately bounded on both sides by adjacent conservation areas (Peabody Estates: South Westminster, and Westminster Abbey and Parliament Square) and by a Grade II listed building (Church of St Matthew).

Planning permission is sought for the erection of security railings and gates on top of the existing site boundary walls fronting Great Peter Street and St Ann's Lane.

The proposals are considered to be harmful to the quality of the local townscape and, in particular, would harm the setting of the adjacent listed building and conservation areas.

Minor highway safety issues arise with regards to the side outwards opening gates, although these are likely to be resolvable through minor design revisions.

An objection has been received from the Thorney Island Society and the Highways Planning Manager. No objections have been raised by the MPS Designing Out Crime Officer. The Foreign and Commonwealth Office's Protocol Directorate have declined to intervene in the case having been advised of officers' recommendations.



4. PHOTOGRAPHS



**Photo 1:** Front (south) elevation – site to left, St Matthew's Church to right.





*Photo 2: Corner of Great Peter St and St Ann's Lane, site on right.*

## 5. CONSULTATIONS

### WARD COUNCILLORS FOR ST JAMES'S:

Any response to be reported verbally.

### FOREIGN AND COMMONWEALTH OFFICE (Protocol Directorate):

Thanks very much for letting us know about this application, we were aware that the Indonesians were considering submitting an application for a fence, but we didn't know to what extent it would be. We have no view on this application, so are content for you to do as you suggest.

### THORNEY ISLAND SOCIETY:

We object to this proposal because it will increase the visual clutter on the street. It also seems a pity that such a visually aggressive addition should be made in the vicinity of a primary school.

### VICTORIA NEIGHBOURHOOD FORUM:

Any response to be reported verbally.

### HIGHWAYS PLANNING MANAGER:

I have no problem with the gates proposed on Great Peter Street, but those proposed on St Ann's Lane open out over what is highway, which is unacceptable.

Under the Highways Act 1980 gates are not allowed to open out over highway. We have allowed some, to avoid having recesses where ASB can take place, but only where the doors or gates are only going to be used in an emergency.

From my reading of Section 3 of the cover letter associated with the application it seems that the gates on St Ann's Lane are also going to provide for "Consular Area access" and for disabled access too, so I would recommend refusal unless a solution can be found that does not involve the gates opening over the highway.

### DESIGNING OUT CRIME:

- The height of the proposed railings is above the recommended 1.8 metres which is satisfactory for protecting the boundary.
- The railings are 'open' which do allow for greater surveillance from the main building.
- It is expected that the developers will install railings that are of a high standard to ensure security and longevity of the boundary. A high quality boundary that lasts for a long time will provide security and reduce overall maintenance costs. A boundary that has a long predicted life is also more sustainable.
- For the above reason the boundary should be constructed as follows... 1) the method of fixing between rails and posts should create a secure mechanical bond so they cannot be easily removed 2) The fixings employed should be galvanized steel or stainless steel with a design life to match the components 3) The railing with a horizontal slats should be avoided to prevent step-ups points for climbing and flush across the attack face to resist being pried off 4) With the railings on top of the current wall they should be located as close to the outer face of the wall as possible to eliminate climbing opportunities or to be used as informal seating.
- The maintaining of an overall height of 2.0 metres appears to be achieved and there appears to be no raking/stepping to maintain the height over the different terrain.

- Pedestrian gates should be framed design, any hinges and fixings should be mounted behind the attack face. Hinges should not be able to be 'lifted off' therefore restrictions to prevent removal of the fence post or wall should be added. The gate should be capable of being locked (FOB access is preferable with a locking mechanism, minimum of two (2) magnetic locks situated two thirds from the top and bottom, self-locking and self-closing mechanism fitted on the non-attack face) The release mechanism to exit the gate should be situated far enough away from the gate or protected to prevent a person reaching through with their hand or with an extension device to activate the lock.
- The gate construction should have the same design and attributes as the boundary.
- Consideration should be given if the change in levels of the terrain allow for access underneath any of the considered gates.

ADJOINING OWNERS/OCCUPIERS AND OTHER REPRESENTATIONS RECEIVED:

No. Consulted: 31

No. of replies: 0

PRESS ADVERTISEMENT / SITE NOTICE: Yes

## 6. BACKGROUND INFORMATION

### 6.1 The Application Site

The application relates to Trevelyan House, 30 Great Peter Street, now in use as the Indonesian Embassy to the United Kingdom. It is a large modern office block of limited architectural merit.

It is not a listed building or otherwise architecturally designated / noted, and is not within a conservation area, but immediately bounds the Peabody Estates: South Westminster Conservation Area to the west and the Westminster Abbey and Parliament Square Conservation Area to the east.

The Church of St Matthew which sits immediately adjacent to the east of the site (and therefore within the Westminster Abbey and Parliament Square CA) is a Grade II listed building of considerable architectural and historic interest.

### 6.2 Recent Relevant History

None relevant.

## 7. THE PROPOSAL

The application seeks planning permission for the erection of metal security railings and gates on top of the existing boundary walls, and lining both the front entrance steps, and the secondary entrance on St Ann's Lane. These would stand at a general height (from the footway) of 1.96 metres.

Where the railings would follow up onto the front entrance steps this would increase with the rise of the steps, and beneath the rear side of the entrance canopy they would fill the aperture which overlooks the Church frontage.

The front steps would be fitted with a sliding entrance gate, whilst the ramp access would be fitted with an inward swinging gate. Both of these gates would be highly decorative and would include the logo of the embassy.

The two side entrances onto St Ann's Lane would feature outward swinging plainly designed gates.

## **8. DETAILED CONSIDERATIONS**

### **8.1 Land Use**

This application raises no land use issues.

### **8.2 Townscape and Design**

The application relates to Trevelyan House, 30 Great Peter Street, now in use as the Indonesian Embassy to the United Kingdom. It is a large modern office block of limited architectural merit. It is not a listed building or otherwise architecturally designated / noted, and is not within a conservation area, but immediately bounds the Peabody Estates: South Westminster Conservation Area to the west and the Westminster Abbey and Parliament Square Conservation Area to the east. The Church of St Matthew which sits immediately adjacent to the east of the site (and therefore within the Westminster Abbey and Parliament Square CA) is a Grade II listed building of considerable architectural and historic interest. The building line of Trevelyan House is set back from the street frontage, in apparent deference to the sightlines to the Church from the west, which are significant to the local townscape. The site is bounded by a broad front area on both frontages, separated from the public footways by a low brick boundary wall. This cuts back to the Embassy entrance via a set of steps which runs down to the public footway immediately adjacent to the Church frontage.

The main issues in this case are considered to be:

- a) The preservation of the setting of the Grade II listed Church of St Matthew;
- b) The preservation of the setting of the adjacent conservation areas (Peabody Estates: South Westminster and Westminster Abbey and Parliament Square);
- c) To protect the amenity of the local townscape;
- d) To protect public highway safety.

The railings and gates would be significantly intrusive to the character of the local townscape due to their significant height coupled with the length of the boundaries to which they would be applied. Where the railings would follow the line back of the front entrance steps they would be particularly harmful due to the layering of the front and side railings in views along the street. This would significantly detract from views of the listed Church in both directions that currently contribute positively to the street scene, both within and outside of the two conservation areas. This would harm the appreciation of the architectural and historic significance of both the church and the conservation areas and would, in more general terms, detract from the quality of the local townscape.

### **8.3 Residential Amenity**

This application raises no amenity issues.

### **8.4 Transportation/Parking**

The proposed front entrance gates have been designed to be contained within the site and therefore would not obstruct the Great Peter Street footway. However, the secondary access gates onto St Ann's Lane would open outwards and would therefore obstruct the public footway. Whilst these are apparently secondary, if not emergency-only exits, the submission includes reference to the use of these for 'consular access' and as such the obstruction that these gates could cause to the footway could be regular. This would be a highway safety and flow risk and would be contrary to the Highways Act 1980. It would also be contrary to Policies TRANS 2 and 3 of the UDP.

### **8.5 Economic Considerations**

No economic considerations are applicable for a development of this size

### **8.6 Access**

The proposals would retain the existing level access to the site.

### **8.7 Other UDP/Westminster Policy Considerations**

There are no other UDP considerations.

### **8.8 London Plan**

This application raises no strategic issues.

### **8.9 National Policy/Guidance Considerations**

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

### **8.10 Planning Obligations**

Planning obligations are not relevant in the determination of this application.

### **8.11 Environmental Impact Assessment**

The application proposals are not EIA development.



## 8.12 Other Issues

### Crime and security

The application states that the motivation for the erection of the railings is due to rough-sleeping and general security for the Embassy. No evidence has been presented of the nature or regularity of the problems being encountered. Whilst a level of security for the Embassy can be expected, no explanation has been given about why the existing or alternative solutions could not provide an adequate level of protection. If specific diplomatic reasons exist for such a proposal, the advice of the Embassy's or their MPS / FCO liaison advisors would be expected to form a part of the application.

In the absence of justification for the specific proposals put forward, the proposals would be contrary to Policies DES 1, DES 5, DES 9 and DES 10 of the UDP, and to paragraph 134 of the NPPF. Planning permission is therefore recommended to refused.

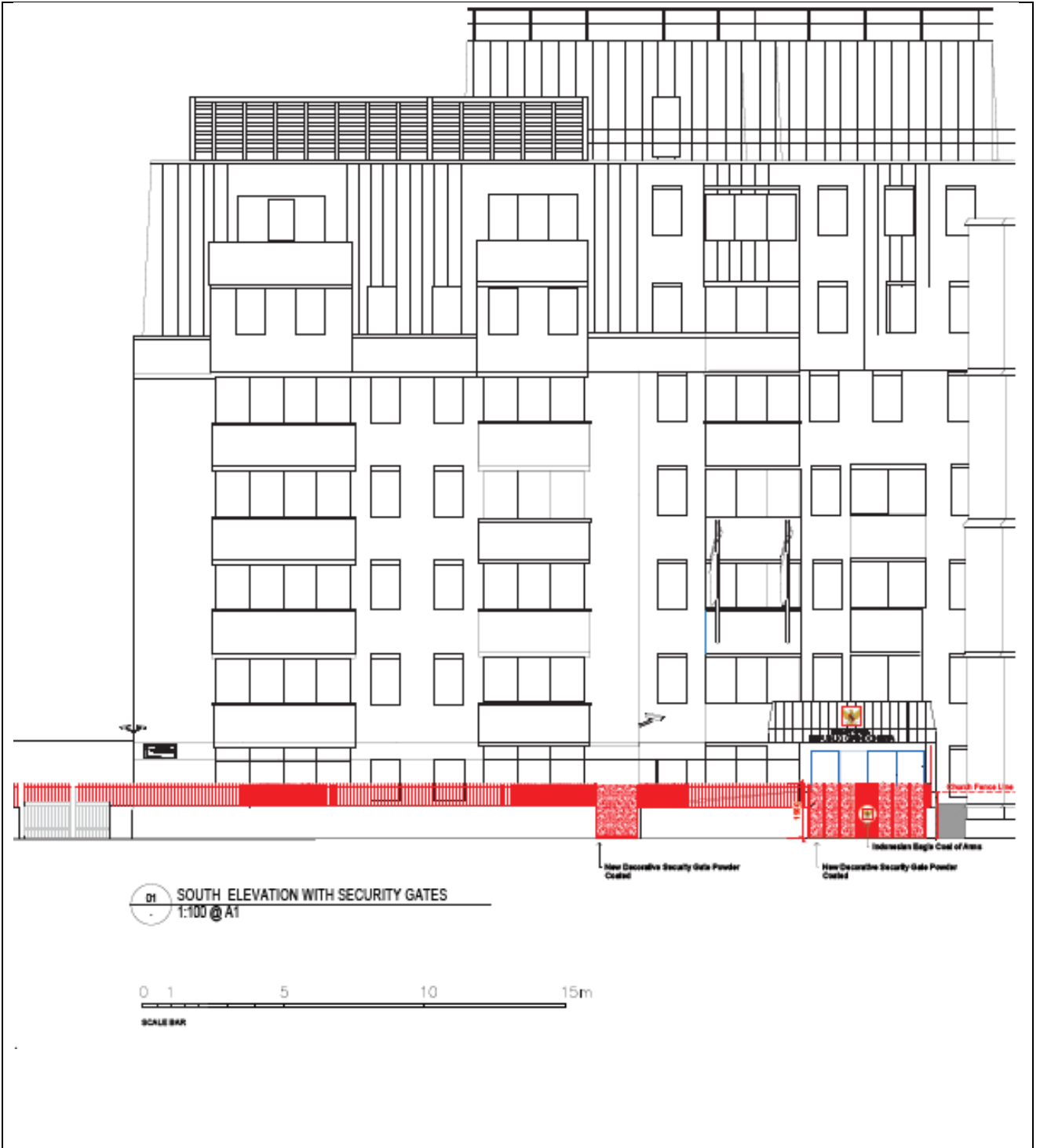
## 9. BACKGROUND PAPERS

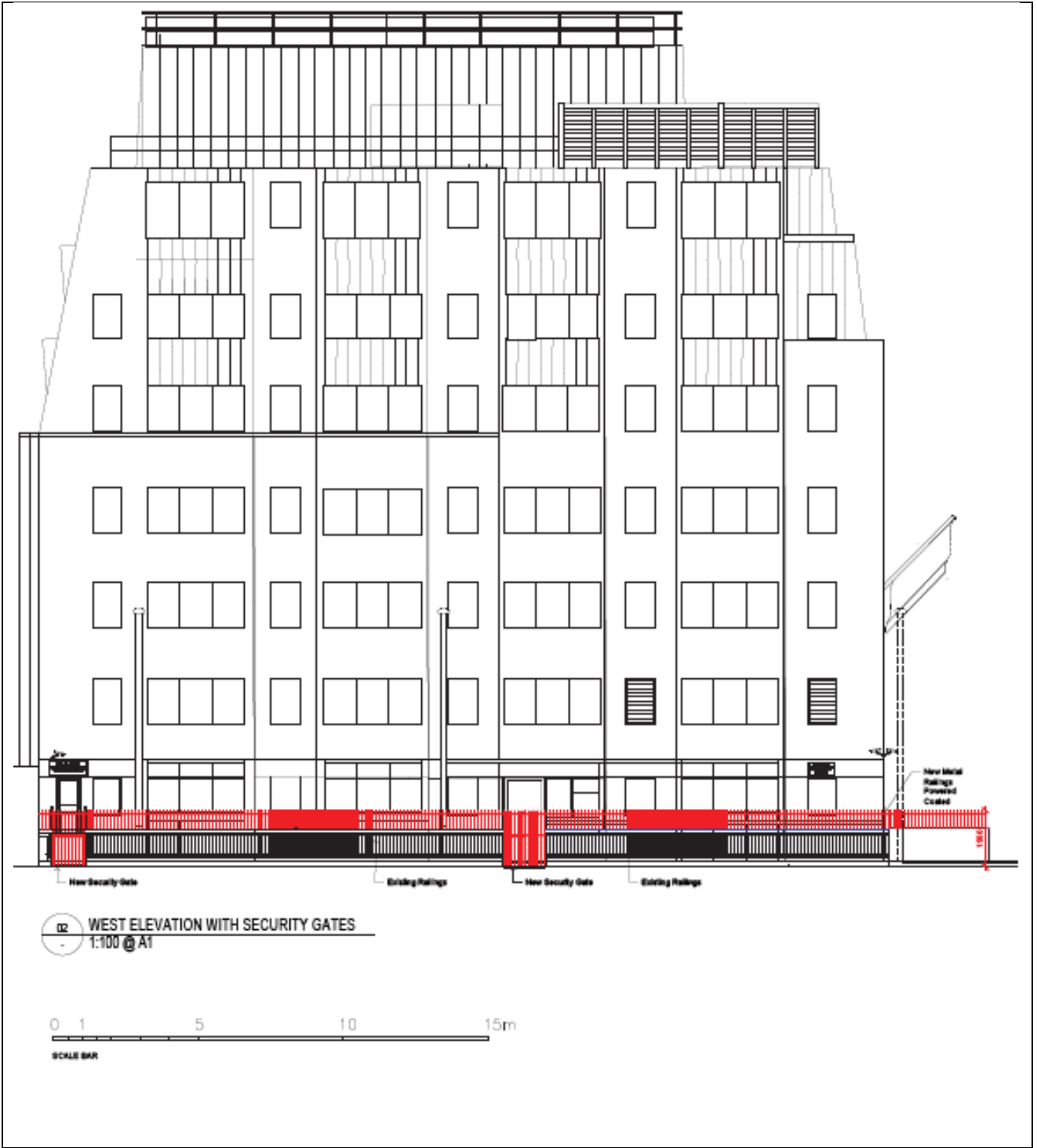
1. Application form
2. Response from Thorney Island Society, dated 25 January 2018
3. Response from Highways Planning - Development Planning, dated 6 February 2018
4. Response from Designing Out Crime Officer, dated 1 February 2018
5. Response from Foreign & Commonwealth Office, dated 9 February 2018
6. Letter from Indonesian Embassy to WCC Chief Executive dated 29 January 2018

(Please note: All the application drawings and other relevant documents and Background Papers are available to view on the Council's website)

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT PLEASE CONTACT THE PRESENTING OFFICER: DAVID DORWARD BY EMAIL AT DDORWARD@WESTMINSTER.GOV.UK.

10. KEY DRAWINGS







**DRAFT DECISION LETTER**

**Address:** Trevelyan House, 30 Great Peter Street, London, SW1P 2BU

**Proposal:** Erection and installation of metal railings and gates around the external frontages of the building for security purposes.

**Reference:** 18/00095/FULL

**Plan Nos:** LOCATION PLAN; 1358WPS PL 1-01-00-A; 1358WPS PL 1-02-00-A; 1358WPS PL 1-03-00-A.

**Case Officer:** Andrew Barber

**Direct Tel. No.** 020 7641 7708

**Recommended Reasons for Refusal**

- 1 Because of the scale and visual clutter around the main entrance, the proposed new railings and gates would harm the appearance of this building and this part of the City, and would harm the setting of the neighbouring grade II listed building (The Church of St Matthew), and would fail to maintain or improve (preserve or enhance) the setting of the neighbouring Westminster Abbey and Palace of Westminster Conservation Area and the Peabody Estates: South Westminster Conservation Area. The application would not meet S25 and S28 of Westminster's City Plan (November 2016) and DES 1, DES 2, DES 9 and DES 10 of our Unitary Development Plan that we adopted in January 2007. The application is also contrary to paragraph 134 of the NPPF. (X16BC) (X20AC) (X21AD)
- 2 The outward opening gate onto St Ann's Lane would block the flow of pedestrians along the footpath and so could be unsafe. This would not be contrary to the Highways Act 1980, and to TRANS 2 AND TRANS 3 of our Unitary Development Plan that we adopted in January 2007.

**Informative(s):**

- 1 In dealing with this application the City Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a proactive way so far as practicable. We have made available detailed advice in the form of our statutory policies in Westminster's City Plan (November 2016), Unitary Development Plan and Supplementary Planning documents, planning briefs and other informal written guidance, as well as offering a full pre application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. However, the necessary amendments to make the application acceptable are substantial and would materially change the development proposal. They would require further consultations to be undertaken prior to determination, which could not take place within the statutory determination period specified by the Department of Communities and Local Government. You are therefore

encouraged to consider submission of a fresh application incorporating the material amendments set out below which are necessary to make the scheme acceptable.

Required amendments:

- a) Significantly lower height of railings throughout to measure no more than 1.4 metres high (as measured from the public footway);
- b) Consider options to replace existing boundary wall to produce more integrated solution of lower wall and railings;
- c) Cut back line of railings / gates at entrance to beneath the entrance canopy (in order to preserve views of the Church).

You are advised to take advantage of our pre-application advice service to discuss options and for informal advice from us before you re-apply.

Please note: the full text for informatives can be found in the Council's Conditions, Reasons & Policies handbook, copies of which can be found in the Committee Room whilst the meeting is in progress, and on the Council's website.