

# PLANNING COMMITTEE REPORT

Development Management Service  
Planning and Development Division  
Environment and Regeneration  
Department

<b>PLANNING SUB-COMMITTEE B</b>		
Date:	25 <sup>th</sup> July 2017	NON-EXEMPT

Application number	P2017/1566/FUL
Application type	Full Planning Permission
Ward	Bunhill Ward
Listed building	No
Conservation area	No
Development Plan Context	Bunhill & Clerkenwell Core Strategy Key Area Central Activities Zone Bunhill & Clerkenwell Finsbury Local Plan Area (BC3 – Old Street) Within 50m of St Luke's Conservation Area
Licensing Implications	None
Site Address	Pavement opposite 130 Old Street, Islington, London, EC1V
Proposal	Retrospective application for the installation of a free-standing solar-powered Smart Bench featuring four branding surfaces and a customer interface.

Case Officer	Emily Benedek
Applicant	Mr Milos Milisavljevic (Strawberry Energy)
Agent	None

## 1. RECOMMENDATION

The Committee is asked to resolve to **REFUSE** planning permission:

1. Subject to the reasons set out in Appendix 1.

## 2. SITE LOCATION (outlined in black)



**3. PHOTOS OF SITE/STREET**



**Image 1:** Street view of the Smart Bench



**Image 2:** View of existing Smart Bench looking east along Old Street towards Old Street Roundabout



**Image 3:** View of existing Smart Bench looking west along Old Street towards St Luke's Close

#### **4. SUMMARY**

- 4.1 This application forms part of a wider scheme across London to install a network of Smart Benches, which are also covering the boroughs of Lewisham and Southwark. These smart benches provide a solar energy source for free smart device charging, WiFi, local environmental data and information about energy consumption. Five (5) applications for full planning permission and advertisement consent were submitted for various sites across Islington.
- 4.2 The Smart Benches contain four different surfaces, and one customer interface, which are able to display non-illuminated signs and therefore require advertisement consent. Planning permission is required for the structures themselves as they have been erected by a private company and not the Council. The application is brought to committee at the request of Cllrs Webbe and Williamson.
- 4.3 The main issues arising from this planning application are the design and appearance of the Smart Bench; its impact on the character of the area; the amenity of neighbouring occupiers; and safety and security.

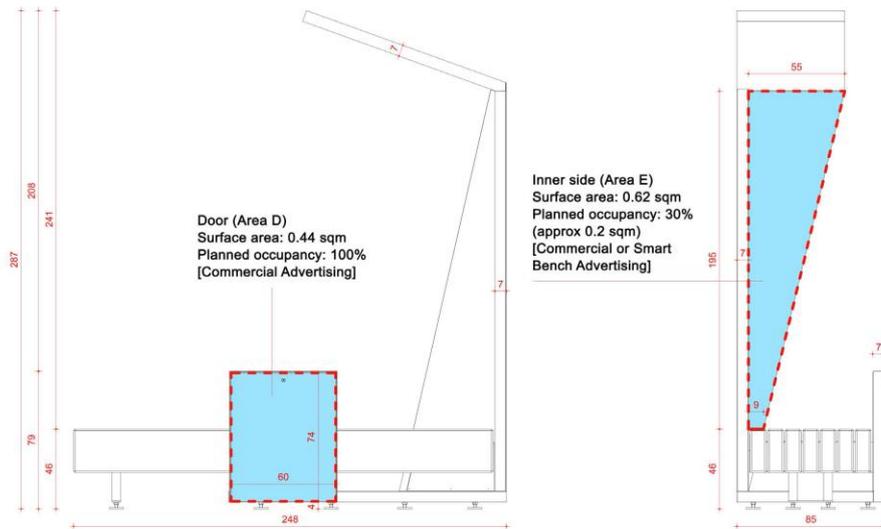
- 4.4 It is considered that the Smart Bench by reason of its siting lacks natural surveillance and would obscure potential offenders from the view of bench users with the potential to increase crime and reduce safety in this locality.

## **5. SITE AND SURROUNDING**

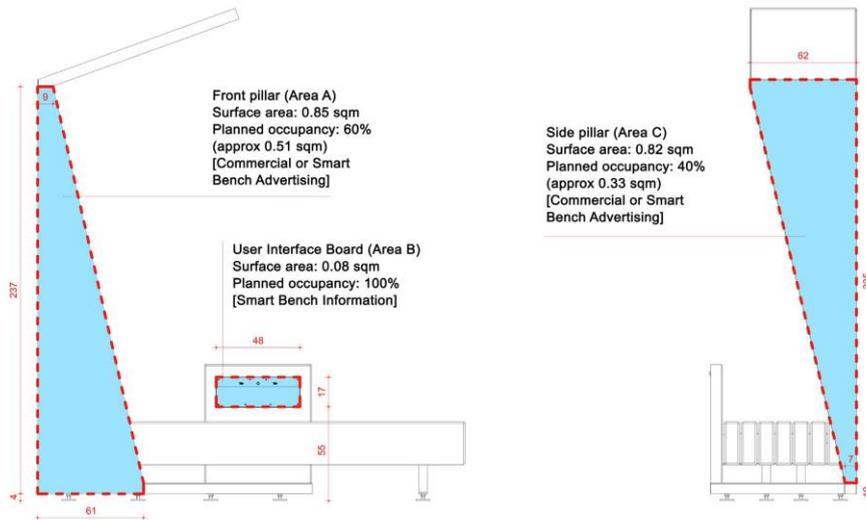
- 5.1 The application site relates to the pavement area opposite 130 Old Street. The Smart Bench is located directly in front of the Redbrick Estate and is separated from this development by a large brick boundary wall. The Redbrick Estate has received planning permission for extensive redevelopment of the site to include new housing and specifically alterations to the boundary wall immediately behind the Smart Bench. The area is characterised by a mix of building heights and styles with buildings ranging from two storeys to eight storeys in height including a mix of commercial and residential uses. The Smart Bench is located 85m east of St Luke's Church a Grade I Listed Building but is not located in a conservation area. The surrounding area is of mixed character.
- 5.2 There is some street furniture in this location including mature street trees located against the back edge of the pavement, existing signage and the Smart Bench is also located 15 metres east of an existing bus stop. The pavement is also slightly elevated in this location. Old Street is a busy thoroughfare with a high level of vehicular movement and a dedicated bus lane leading to Old Street roundabout.

## **6. PROPOSAL (in Detail)**

- 6.1 Retrospective planning permission is sought for the erection of a free-standing solar-powered Smart Bench featuring four branding surfaces and customer interface.
- 6.2 The new Smart Bench consists of two main parts. An angled, black steel construction which contains the solar panels on the roof area and a wooden seating area featuring two arm rests. In addition, a charging interface has been installed to the rear of the bench which enables users to charge their portable devices. The proposed Smart Bench itself would measure 2.48 metres in width and 2.87 metres in height with an overall depth of 0.85 metres and the seating area would be located 0.46 metres off the pavement. The Smart Bench would also house Wi-Fi, local environmental data (temperature, humidity, barometer, CO2 meter and sound meter) and will also provide information about energy consumption.



Side and rear elevations of the smart bench



Front and side elevations of the smart bench

**Images 4 and 5:** Design of the Smart Bench showing the locations for potential adverts

## 7. RELEVANT HISTORY:

### PLANNING APPLICATIONS:

#### 7.1 112-116 Old Street (45m from the site):

P2017/1576/ADV - Advertisement Consent for temporary advertising hoarding (externally illuminated) for advertising located at 2nd floor on the north elevation of 112-116 Old Street for a period of 12 months. Refused (13/06/2017)

Reason for Refusal: The proposed externally illuminated sign by reason of its design, scale, size, siting and method of illumination will have a detrimental

impact on the visual amenity of the locality, detrimental to the setting of the St Luke's Church Grade II Listed Building and will fail to preserve and enhance the character and appearance of the St Luke's Conservation Area. The proposal is contrary to policies CS7 and CS9 of the Core Strategy (2011), policies DM2.1, DM2.3 and DM2.6 of the Development Management Policies (2013) and the supplementary guidance Islington Streetbook (2012) and Conservation Area Design Guidelines (2002).

7.2 Pavement opposite 142-146 Old Street (40m from the site):

P2017/0604/ADV - Installation of a free standing internet/ wifi/ telephone kiosk known as a 'link unit', with internally illuminated advertisement screens to two sides. Withdrawn (06/06/2017). The application was withdrawn as another application for a more appropriate location for the link unit was submitted in the immediate locality and there was no requirement for both units.

7.3 148 Old Street (60m from the site):

P2016/2313/ADV - Erection of temporary construction hoarding containing advertisements. Approved (25/07/2016)

7.4 Pavement opposite 148 Old Street (90m from the site):

P2016/0089/ADV - Erection of a single panel - 6 Sheet Advertisement Display Freestanding internally Illuminated Panel on the pavement opposite 148 Old Street. Withdrawn (10/06/2016)

7.5 Pavement opposite 122-128 Old Street (15m from the site):

Installation of a double-sided freestanding Forum Structure, featuring 1 x Digital 84" screen on one side and a static poster advertisement panel on the reverse. Approved (17/11/2015)

## **ENFORCEMENT**

7.6 ENF/2017/45 – Bench and solar panel.

## **PRE-APPLICATION ADVICE:**

7.7 None.

## **8. CONSULTATION**

### **Public Consultation**

8.1 Letters were sent to occupants of adjoining and nearby properties on Old Street on 3 May 2017. A site notice was displayed outside the site on 11 May 2017. The public consultation on the application ended on 1 June 2017.

8.2 It is the Council's practice to continue to consider representations made up until the date of a decision. At the time of writing of this report no letters of representation had been received from the public with regard to the application.

## External Consultees

8.3 **Crossrail 2:** No objection.

8.4 **Metropolitan Police:** Whilst the benches are a good idea in terms of providing a service to members of the public, some concerns are raised over the safety of those using them and the vulnerability of the benches to criminal damage. Islington Borough suffers from a huge number of motorbike and pedal cycle enabled thefts. The concern is that for benches positioned close to the road it is an opportunity for thieves travelling past to snatch phones and ipads being charged at the smart benches. To mitigate this problem moving the bench at least 1 – 2 meters from the kerb line, near other street furniture or placing them in line of sight of a capable guardian such as security for local stores and tube stations would be advised.

Signage on the panel of the bench warning people to protect their belongings would also increase awareness and vigilance to these types of opportunist thieves. It is noted that the arm rests on the benches are 'optional'. It is suggested that they are used in all locations to reduce the risk of rough sleepers. Other than these issues the bench's appear to be a good design providing maximum slight lines for natural surveillance whilst still being able to incorporate the solar panel.

There is the obvious risk of criminal damage with such high public usage of this service. To negate this risk, it is advised placing the benches in clear line of sight of monitored CCTV cameras in order to deter anyone from carrying out vandalism or theft of personal property.

There are concerns about this site. Old Street lacks natural surveillance with the wall behind the bench blocking views and the position of the bench is not a natural gathering point on the street. This could allow crime to occur at less busy times and no one notice it happening.

No objection with regards to the advertisements themselves.

## Internal Consultees

8.5 **Design and Conservation:** Objects to the proposal. As a stand-alone structure, without taking account of its impact on its surrounds, the design of the smart bench was found to be quite interesting and might work in large open spaces or landscaped plazas surrounded by large contemporary buildings. However, for the sites in Islington, these structures are wholly inappropriate. They are very large, they add visual clutter to the streetscape, they obstruct views along the street and shop frontages. The Conservation officer considers that they detract from the sensitive historic setting of Islington and the addition of the signage further exacerbates the visual harm they cause.

This site is not located within a conservation area, however it is in close proximity to the St Luke's Conservation Area and the Grade I listed St Luke's church. Although it is accepted that there is an uncluttered area here, the bench disrupts the clean composition of the alterations to the boundary of the Redbrick Estate which was something recently approved. Also there is a bus stop in

close proximity (cumulative impact/clutter) and there are views into the Conservation Area.

8.6 **Highways:** No objection.

8.7 **Planning Energy Advice:** No objection.

### **Interested Parties**

8.8 **Islington Society:** Objects to the application. The Islington Society is of the view that Islington and its residents have no need for any of the applications for street advertising and communications. The various erections themselves are a blight on the Borough landscape. The Islington Society also object to the increase in street clutter.

## **9. RELEVANT POLICIES**

Details of all relevant policies and guidance notes are attached in Appendix 2. This report considers the proposal against the following Development Plan documents.

### **National Policy and Guidance**

9.1 The National Planning Policy Framework 2012 and Planning Policy Guidance (PPG) seek to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF and PPG are material considerations and have been taken into account as part of the assessment of these proposals.

### **Development Plan**

9.2 The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The policies of the Development Plan that are considered relevant to this application are listed at Appendix 2 to this report.

### **Supplementary Planning Guidance (SPG) / Document (SPD)**

9.3 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

## **10. ASSESSMENT**

10.1 The main issues arising from this proposal relate to:

- Background
- Legislation
- Character and Appearance
- Neighbouring Amenity

- Safety and Security
- Sustainability

## **Background**

- 10.2 These applications form part a wider scheme across three London boroughs, including Lewisham and Southwark, to install a series of Smart Benches at various sites across the borough.
- 10.3 The Smart Benches are primarily proposed to replace existing benches. They have been designed to increase the usability of limited public space by providing multiple services for pedestrians. The Smart Benches will be powered by solar panels located on the roof of the bench, thereby creating a positive attitude towards sustainable lifestyles as well as enabling people to think about the potential opportunities deriving from the use of green technology such as solar power.
- 10.4 The Smart Benches would provide a greater range of services to the public than the benches they are replacing. Two outdoor rubber charging cables and two USB ports are provided to allow users to charge their portable mobile devices. These are powered by the energy provided through the solar panels which is stored in an internal battery, allowing it to work day and night even when it has been raining or cloudy for several days. Mobile phone users can link into the unit's public Wi-Fi whilst environmental sensors (temperature, humidity, barometer, CO2 meter and sound meter) provide details about environmental conditions in the immediate locality.
- 10.5 The Smart Benches can contain up to five non-illuminated adverts (as shown in Images 4 and 5 of this report). The adverts will be applied by wrapping vinyl foil with an over-laminate and will be attached to the steel structure. The exact position of the adverts on each surface will vary dependent on the sponsor and it is intended that not all areas of advertising will be utilised at once. Advertisement consent has also been applied for as part of this application for the retention of 3 existing advertisements. A condition on any consent if granted could control the number and extent of the branding surfaces used at any one time.

## **Legislation**

- 10.6 Whilst the above summary explains the background to the scheme, it is important to understand why the Smart Bench requires planning permission. This is outlined in Part 9 Class A and Part 12 Class A of Schedule 2 of the General Permitted Development Order (2015). Part 9 Class A of this Act refers to works carried out by the Highways authority 'on land within the boundaries of the road, of any works required for the maintenance or improvement of the road, where such works involve development by virtue of section 55(2)(b)(38) of the Act.' It is important to note in this instance that the Smart Benches have not been installed by the Highways Authority but by a private company, Strawberry Energy. As such, this application does not comply with Part 9 Class A of this legislation.

- 10.7 This view is further emphasised by Part 12 Class A (b) of Schedule 2 which notes the following:

‘The erection or construction and the maintenance, improvement or other alteration by a local authority or by an urban development corporation of (b) lamp standards, information kiosks, passenger shelters, public shelters and seats, telephone boxes, fire alarms, public drinking fountains, horse troughs, refuse bins or baskets, barriers for the control of people waiting to enter public service vehicles, electric vehicle charging points and any associated infrastructure, and similar structures or works required in connection with the operation of any public service administered by them.’

Therefore, planning permission is required for the installation of the Smart Bench.

### **Design and Appearance**

- 10.8 Development Management Policy DM2.1 requires ‘all forms of development are required to be of high quality, incorporate inclusive design principles and make a positive contribution to the local character and distinctiveness of an area, based upon an understanding and evaluation of its defining characteristics.’ A Smart Bench has been installed on the pavement opposite No 130 Old Street. It is important to note that this Smart Bench did not replace an existing piece of street furniture.
- 10.9 The new Smart Bench consists of two main parts. An angled, black steel construction which contains the solar panels on the roof area and a wooden seating area featuring two arm rests. In addition, a charging interface has been installed to the rear of the bench which enables users to charge their portable devices. In the absence of the consideration of site context, there would be no objections raised to the design of the Smart Bench.
- 10.10 The design of the Smart Bench is more modern than typical street furniture found in various sites around the borough however, as the Design and Conservation officer notes, they might be appropriate in certain contexts such as large open spaces or landscaped plazas surrounded by large contemporary buildings. Old Street is characterised by a mix of building styles and heights. For example, a large eight storey building at No 148 Old Street is currently undergoing redevelopment to create a large modern building. The Smart Bench is dwarfed by the large boundary wall which separates Old Street with the Redbrick Estate, although this relationship will be altered when the redevelopment for the Redbrick Estate including alterations to the existing wall is completed. Furthermore, the pavement is wider than a standard pavement in this part of the borough, measuring 4.8 metres in width in the location of the Smart Bench. As such, no objections are raised to the installation of the Smart Bench in this location from a design perspective.
- 10.11 The immediate area surrounding the Smart Bench contains a limited amount of street furniture including an existing public telephone box and street trees. It is also important to note that the Smart Bench has not replaced an existing bench

and whilst there is a net gain of street clutter as a result of the Smart Bench, it is not considered to be harmful in this location. The Smart Bench is set back from the road and does not appear overly dominant when viewed from the east or west elevations along Old Street.

- 10.12 The Council's Design and Conservation officer raised concerns about the location of this bench in relation to the existing heritage assets, namely the St Luke's Conservation Area and the Grade I Listed Building at St Luke's Church. However, whilst the application site is located within 50 metres of the conservation area, it is more than 80 metres away from the listed building and therefore the Smart Bench is not naturally viewed in conjunction with either.
- 10.13 It is considered that the Smart Bench is appropriate in terms of size and design in this particular location given the scale of the buildings and width of the pavement and would not impact unacceptably on the character of the area. The proposal is therefore in compliance with policy DM2.1 of the Development Management Policies 2013.

### **Neighbouring Amenity**

- 10.14 Development Management policy DM2.1A part x states that developments are required to provide a good level of amenity to neighbouring occupiers, including consideration of overlooking, privacy, direct sunlight and daylight, over dominance, sense of enclosure and outlook.
- 10.15 The existing Smart Bench measures a maximum of 2.87 metres in height and is located at a lower level than the brick boundary wall which separates Old Street from the Redbrick Estate. The Smart Bench is located more than 20 metres from the nearest commercial property on the opposite side of the road at 130 Old Street and will therefore not have an impact on their amenity. Given the open nature of the structure, its height, the lack of illumination and the distance from the nearest neighbouring properties, the proposal is not considered to have an adverse impact on the amenity of any neighbouring occupiers, in compliance with Development Management Policy DM2.1.

### **Safety and Security**

- 10.16 Core Strategy Policy CS8 seeks to ensure that all new development enhances Islington's character. More specifically, Part B of this policy states that 'public realm improvements will enhance pedestrian and cycle routes, making it easier to travel sustainably through the borough. Open spaces will be maintained and enhanced to ensure they are inclusive, accessible spaces.' It is important to consider this policy in conjunction with Development Management Policy DM2.1 part A ii) which notes that for developments to be acceptable they are also required to be 'safe and inclusive.' In addition, Finsbury Local Plan policy BC3 requires development proposals to provide 'a substantially improved public realm that unifies the streets and spaces around the roundabout, improves access to the underground station and prioritises pedestrian and cyclist circulation and safety.'

- 10.17 Safety and Security are important aspects of this application as it is important to ensure users of the Smart Bench are not faced with an increased risk of crime as a result of using them. The Metropolitan Police have assessed the application and considered that the main concern would be for benches positioned close to the road as it would provide an opportunity for thieves travelling past to snatch phones and iPads being charged at the Smart Benches. They therefore recommended that the bench is located at least 1 – 2 metres from the kerb line, near other street furniture or placing them in line of sight of a capable guardian such as security for local stores and tube stations would be advised.
- 10.18 There are strong concerns about the siting of this Smart Bench, with regards to safety and security of users of this bench, who are at increased risk of crime by virtue of its location. The Smart Bench lacks natural surveillance with the wall behind the bench blocking views and the position not being a natural gathering point on the street. This could allow crime to occur at less busy times and no one notice it happening. It is noted that this Smart Bench also includes two arm rests which reduces the risk of rough sleepers. As such, there is an objection to this application from a crime and safety perspective as the Smart Bench puts users at increased risk of being a victim of crime which is contrary to the aforementioned policies listed above.
- 10.19 In view of the above, it is considered that the Smart Bench by virtue of its siting lacking natural surveillance puts its users at increased risk of being a victim of crime. As such, the proposal is contrary to policies CS8 and CS9 of the Islington Core Strategy (2011), policy DM2.1 of the Islington Development Management Policies (2013) and Finsbury Local Plan policy BC3 (2013).

## **Sustainability**

- 10.20 The overarching policy for Sustainable Design in Islington's Core Strategy, policy CS10 requires 'all development to be designed and managed to promote sustainability through their ongoing operation, for example through measures which raise awareness about environmental issues and support sustainable lifestyles.' This policy is supported by Development Management Policy DM7.1 which notes in Part A that 'Development Proposals are required to integrate best practice sustainable design standards during design, construction and operation of the development,' whilst part B of the same policy states that 'The Council will support the development of renewable energy technologies in principle, in principle, subject to meeting wider policy requirements, including on design (Policy DM2.1).' As such, the Council welcomes the inclusion of Green Technology in the scheme, namely the inclusion of a solar panel on the roof area, which ensures only renewable energy is used to charge the mobile devices whilst at the same time raises awareness about sustainable issues within the borough.
- 10.21 The Council's Planning Energy Advice team were consulted as part of this application and were supportive of the proposal as they are widening the use of renewable energy within the borough. The case officer raised concerns

regarding the effectiveness of these panels given that they are located under a tree. The Planning Energy officer noted this point and remarked that it is likely to reduce the output from the photovoltaic panels and from a technical point of view, would advise against installing benches in a significantly shaded area. However, the officer also stated that as the benches are not required to demonstrate performance against a target, where photovoltaic panels underperform for this reason, it is also at the installer's risk. It is also important to note that the solar panels have been oriented towards the south-east in order to maximise their efficiency.

- 10.22 Given the above, whilst the use of renewable energy sources is welcomed in this location and the proposal would comply with Core Strategy policy CS10 and Development Management Policy DM7.1. However, to ensure the photovoltaic panels are able to perform to their required levels given their siting underneath a street tree, had the scheme been supported, a condition would require evidence that the bench was adequately solar powered or its removal would be sought.

### **Other Matters**

- 10.23 As noted above, the existing Smart Bench is located adjacent to the large brick boundary wall which separates the Redbrick Estate from Old Street. As part of the redevelopment of the Redbrick Estate (planning permission reference P2015/0709/FUL) substantial alterations were proposed to the wall including its partial demolition and replacement with glazing in order to improve the appearance of the wall and reduce its bulk and massing. The existing structure is located in the same position as part of the proposed glazed wall, and whilst not a recent for refusal itself, is important to note, as the Smart Bench, by reason of its size and siting, could compromise the redevelopment plans for the Old Street elevations of the Redbrick estate. It is considered that the Smart Bench, in the middle of a partially glazed wall, would look at odds within the street scene and would be detrimental to the character and appearance of the area. Whilst the redevelopment of the boundary wall would improve the situation, there is no time frame for the development to be carried out. As such, the concerns raised by the Metropolitan Police still remain relevant.

## **11. SUMMARY AND CONCLUSION**

### **Summary**

- 11.1 The full planning application for the retention of the Smart Bench has been assessed in terms of its design and appearance and impact on the character of the area, impact on neighbouring amenity and safety and security. Having taken into account the size of the bench structure, its appearance in relation to the surrounding properties and the safety and security of users of this Smart Bench, the proposal is considered unacceptable with regards to its siting as, due to the lack of natural surveillance, it will put users of the Smart Bench at increased risk of being a victim of crime.

- 11.2 As such, the proposed development is not considered to accord with the policies in the London Plan, Islington Core Strategy, Finsbury Local Plan, Islington Development Management Policies and the National Planning Policy Framework and as such is recommended for refusal.

**Conclusion**

- 11.3 It is recommended that planning permission be refused as set out in Appendix 1 - RECOMMENDATIONS.

## APPENDIX 1 – RECOMMENDATIONS

### RECOMMENDATION A

That planning permission shall be refused for the following reason:

#### Reason for Refusal for Planning Application P2017/1566/FUL:

<b>1</b>	
	REASON: The existing smart bench by reason of its siting immediately adjacent to a large brick wall results in a lack of natural surveillance that obscures potential offenders from bench users with the potential to increase crime and reduce safety in this locality. The proposal is contrary to, policies CS8 and CS9 of the Islington Core Strategy (2011), Finsbury Local Plan policy BC3 (2013) and policy DM2.1 of the Islington Development Management Policies (2013).

#### List of Informatives:

<b>1</b>	<b>Positive Statement</b>
	<p>To assist applicants, the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website.</p> <p>A pre-planning application advice service is also offered and encouraged.</p> <p>No pre-application discussions were entered into. On receipt, the scheme did not comply with policy or guidance. The LPA acted in a proactive manner offering suggested improvements to the scheme to secure compliance with policies and written guidance which were not adopted by the applicant during the application stage.</p> <p>The LPA delivered the decision in a timely manner in accordance with the requirements of the NPPF.</p> <p>The LPA invites the applicant to enter into a collaborative pre-planning application discussion process to assist in the preparation of a new planning application.</p>
<b>2</b>	<b>Removal of Smart Bench</b>
	The Smart Bench should be removed within 3 months of the date of this decision otherwise the Council will consider taking enforcement action.

## **APPENDIX 2: RELEVANT POLICIES**

This appendix lists all relevant development plan policies and guidance notes pertinent to the determination of this planning application.

### **1. National Guidance**

The National Planning Policy Framework 2012 and Planning Policy Guidance (PPG) seek to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF and PPG are material considerations and have been taken into account as part of the assessment of these proposals.

The National Planning Practice Guidance 2014 (online) is a material consideration which has been taken into account as part of the assessment of these proposals.

### **2. Development Plan**

The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The following policies of the Development Plan are considered relevant to this application:

#### **A) The London Plan 2016 - Spatial Development Strategy for Greater London**

Policy 7.4 Local Character  
Policy 7.6 Architecture

#### **B) Islington Core Strategy 2011**

##### Strategic Policies

Policy CS 7 – Bunhill & Clerkenwell  
Policy CS 9 - Protecting and enhancing Islington's built and historic environment

#### **C) Development Management Policies June 2013**

Policy DM2.1 – Design  
Policy DM2.3 - Heritage  
Policy DM8.2 – Managing transport impacts

#### **D) Finsbury Local Plan 2013**

Policy BC3 – Old Street

### **3. Designations**

Bunhill & Clerkenwell Core Strategy Key Area  
Central Activities Zone  
Bunhill & Clerkenwell Finsbury Local Plan Area  
Within 50m of St Luke's Conservation Area

**4. SPD/SPGS**

Urban Design Guide 2017  
Streetbook 2012