

# **Holy Trinity Church Revised Scheme**

## **Planning Statement**

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**LICHFIELDS**

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## 1.0 Introduction

### Scope of Report

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of Lighthouse London. It accompanies a full planning application for the extension, remodelling, and refurbishment of the existing Holy Trinity Church, Finchley Road, NW3 5HT. The description of development is as follows:

*“The extension and refurbishment of the existing Holy Trinity Church (Use Class F1) to provide improved worship space and an ancillary café, with a new level access provided from Finchley Road.”*

- 1.2 The purpose of this Planning Statement is to assess the proposed development against the relevant national and local planning policy.

### Planning Application Submission

- 1.3 This Planning Statement should be read alongside the following documents which have been prepared to accompany the planning application submission:

- 1 Planning application forms and ownership certificates;
- 2 Design and Access Report, prepared by Reed Watts;
- 3 Environmental Noise Survey & Plant Noise Impact Assessment, prepared by Quantum Acoustics;
- 4 Energy Report and Sustainability Statement and Appendices (including Overheating Study and Daylighting Study), prepared by Skelly & Couch;
- 5 Proposed Elevations (1/2 and 2/2) (refs. 2401(o)300 and 2401(o)301), prepared by Reed Watts; and
- 6 Proposed Sections (1/3, 2/3 and 3/3) (refs. 2401(o)200, 2401(o)201 and 2401(o)202), prepared by Reed Watts.

### Structure of Report

- 1.4 Section 2.0 describes the application site, surrounding area and provides other background information to why this development proposal is coming forward. Section 3.0 briefly describes the proposed development with reference to the more detailed description in the DAS.
- 1.5 Section 4.0 summarises relevant national and local planning policy and section 5.0 assesses the proposal against the key planning policy issues identified. A short conclusion is provided at section 6.0.

## **2.0 Background**

### **The Application Site**

- 1.1 The application site (“the site”) is located within the Finchley Road/ Swiss Cottage Town Centre, opposite Finchley Road tube station and the O2 shopping centre.
- 1.2 The site currently comprises the Holy Trinity Church which dates to the 1970s. This was constructed together with adjacent buildings, Lief House and Alban House. These buildings replaced an earlier Victorian church. The Church’s services and activities have expanded over the years and become a central part of the local community. The existing building requires redevelopment to provide sufficient floorspace to meet the needs of the Church and community. The needs of the Church have been central to the design vision, particularly regarding the provision of community facilities to extend its commitment to working within the local community.
- 1.3 In its immediate context the site is bound by Finchley Road to the west, Lief House and associated car parking area to the north/north west, Alban House to the east and 120 Finchley Road to the south/south east.
- 2.1 The existing footprint of the Church occupies the majority of the site and comprises a single storey building. The Church is accessed via ten steps from Finchley Road at the western elevation. An accessible entrance is situated on the northern elevation accessed via a footpath adjacent to the northern edge of the site. The footpath also allows access from Finchley Road to Alban House, a residential building, situated at the rear (east) of the Church.

### **Surrounding Area (Setting and Designations)**

- 2.2 The Church leases two spaces within the existing car park to the rear of Lief House, a situation which will remain as existing. Vehicle access to the Church (for drop-off) is via Sumpter Close from Finchley Road. Sumpter Close can only be accessed by vehicles heading south along Finchley Road. Lief House is a four storey, 1970s red brick building, and is home to the British College of Osteopathic Medicine. Lief House features a pedestrian walkway which aligns the northern edge of the site. This footpath is used to access the main entrance to Lief House and also the side (north) entrance to the Church and the main entrance to Alban House. Alban House is a seven storey residential block, also constructed of red brick. The Church, Alban House and Lief House are of a complementary design all constructed of the same red brick.
- 2.3 No.120 Finchley Road is located to the south and south east of the Church. Planning permission was granted in 2010 for a seven storey development largely comprising of student accommodation, with a retail unit at ground floor. The majority of the development has been completed.
- 2.4 The site is not situated within a flood risk zone and has a Public Transport Accessibility Level (PTAL) rating of 6b (where 1 is least accessible and 6b is most accessible).
- 2.5 The site itself is not located within a Conservation Area, nor is it listed, however it does lie adjacent to the Fitzjohns Netherhall Conservation Area and opposite the South Hampstead Conservation Area.

## Relevant Planning History

- 2.6 On the 13 February 1975, planning permission was granted for:
- “The erection of a new church, chapel and hall; a four storey office building with 2 flats above forming a fifth storey, and a 5 storey block of 20 residential flats, and associated parking space on the site occupied by Holy Trinity Church, Finchley Road, NW3.”*
- 2.7 On the 28 September 2017, planning application ref. 2017/2092/P was granted conditional planning permission subject to a Section 106 Agreement at LB Camden’s planning committee meeting. The description of development is as follows:
- “Erection of 6 storey building (including excavation of ground floor level) to provide Christian community centre (Sui Generis), including worship space and performance venue (450 seat auditorium), café, flexible community space, recording studio, employment readiness training facilities, supported residential accommodation at 4th floor (2 x 2 bed flat & 1 x 3-bed flats) and theological student accommodation at 5th floor level (1 x 1 bed flat and 1 x 2 bed flat) with rear and side roof terraces at 5th and 3rd floor level, balcony at 4th floor level, associated bin store, cycle store and substation following demolition of existing church.”*
- 2.8 The application was subsequently withdrawn as the Section 106 Agreement was not signed. The committee report set out the floorspace figures for the proposal as shown in Table 1 below.

Table 1

Use Class	Existing (GIA)	Proposed (GIA)	-/+
D1 Non-residential Institution	501 sqm	0	-501 sqm
Sui Generis (as mix of uses)	0	2398 sqm	+2398 sqm
<b>Total uplift</b>			<b>+1897 sqm</b>

Source: Camden Report to Committee 28/09/2017

## Pre-Application Discussions

- 2.9 A pre-application request was submitted for the current proposals on 6 November 2024, for the alterations and extensions to the existing church building to meet the congregation’s needs. The pre-application proposal was based on an amended design approach which was more holistic and retained much of the existing building with a focus on improving the fabric of the church, upgrading its energy efficiency and creating a series of new spaces which are uplifting, fit for use and accessible for all.
- 2.10 The pre-application proposal significantly reduces the quantum of floorspace when compared to the previous approval, as set out in Table 2 below.

Table 2

Use Class	Existing (GIA)	Proposed (GIA)	-/+
F1 (f) (previously D1)	504 sqm	768 sqm	+264 sqm

Source: Reed Watts Architects Stage 1 Report

- 2.11 This pre-application was generally supported by the Council who concluded that the principle of the works and general bulk of the extensions was supported. The Council suggested further work could be undertaken to refine the design/form of the front

extension to ensure the building presents and integrates well with the street environment and wider townscape. The Council also expected design integration of energy efficient and sustainable measures. It was also suggested that further information could be provided regarding existing/proposed trip generation and capacity of the church to inform recommendations regarding transport related planning obligations.

## 3.0 Proposed Development

3.1 The description of development is as follows:

*“The extension and refurbishment of the existing Holy Trinity Church (Use Class F1) to provide improved worship space and an ancillary café, with a new level access provided from Finchley Road.”*

3.2 The proposed uplift in floorspace is set out in table 3 below:

Table 3

Existing (GIA)	Proposed (GIA)	Uplift (GIA)
497 sqm	629 sqm	+132 sqm

3.3 The Design and Access Statement prepared by Reed Watts and associated drawings provide a full breakdown of the proposed new and refurbished spaces and layout within the building. This has been summarised below:

### Ground floor

3.4 The majority of significant change will happen at the front of the building, facing onto Finchley Road. The proposal is to demolish the smaller single storey structures and reduce levels to provide new space which would be publicly accessible at street level. The entrance will be located at the north/ east corner, which is directly opposite the Finchley Road tube station. The current building line would be maintained. Steps and a lift are proposed to provide access to the main worship space and the rest of the building.

### Café

3.5 A new café is proposed along the width of the building at ground floor level. This would create an active frontage and be a welcoming social space for community gatherings. An accessible WC is proposed.

### Worship space

3.6 The proposal is to retain and refurbish most of the existing hexagonal plan (including the concrete frame, which is embedded within the brickwork wall) and to expand the worship space eastwards to improve the worship space for the existing congregation.

3.7 The proposed works include:

- replacing the existing roof;
- moving the stage to the far (east) end of the space and raising it by 0.4m;
- raising the ceiling along its length, with large trusses spanning the space and clerestory windows either side to provide natural light;
- integrating storage space along the south wall for furniture; and
- infilling existing windows as with light would be provided by high level clerestory windows on either side. Services such as duct work, lighting, speakers and projectors will be integrated into the new roof structure.

## **New ancillary spaces to the rear of the building**

- 3.8 Through remodelling the rear of the building, a new kitchen, WC's, storage, electric plant room and sound booth is proposed. On the other side of the stage a flexible space (creche/ training area) is proposed which could be divided in two with a folding screen if required. A new rear door is proposed to provide access to an external outdoor space and cycle parking area. The stair core to the rear of the building would be removed.

## **First floor**

- 3.9 The first floor above the café would have new flexible spaces, storage, an electric plant room, accessible WC's and a recording studio/office. A new office is proposed adjacent to the two existing offices to the rear of the building that would also be refurbished. This provides valuable accommodation for young Church members but also helps to positively increase the presence of the building along Finchley Road.

## **Second floor**

- 3.10 A small accessible roof terrace is proposed and plant equipment will be provided at second floor roof level. Both spaces would be screened to minimise impact both visually and acoustically.

## **Proposed external appearance**

- 3.11 The Design and Access Statement prepared by Reed Watts provides details on the proposed external materials and character.
- 3.12 The majority of the facade at ground floor level facing Finchley Road would be glazed, allowing views into the tall day-lit cafe space, with glimpses of the auditorium beyond. The ground floor columns to the front elevation would be lined with timber or stone to provide a more robust finish at this public level. Above this level the façade will be rendered and would extend around either side of the extension, then joining with the existing structure. The remaining facades of the building will also be sheathed with a new skin of insulated render. A large cross is proposed on the northern corner of the front elevation to signpost the entrance and create visual balance with the proposed large windows.



## 4.0 Planning Policy and Legislative Framework

- 4.1 This section identifies key relevant planning policy and guidance at a national and local level relevant to this proposal. The proposed development is then assessed against these policies in Section 5.0.

### Statutory Development Plan

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:

- 4.3 *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.*

- 4.4 The statutory development plan for the site comprises:

- 1 Camden Local Plan 2017 (adopted in July 2017)
- 2 The London Plan (adopted March 2021)

- 4.5 From January to March 2024, the Council consulted on their draft new Local Plan. Following this, an updated version of the Local Plan will be issued for further consultation in Spring 2025. As this application has been submitted prior to the adoption of the Council’s draft new Local Plan, the planning assessment has been undertaken against the 2017 Camden Local Plan, with the emerging Local Plan being a material consideration.

- 4.6 The following development plan policies and guidance have been referenced when formulating this proposal:

### Camden Local Plan 2017

- C2 Community facilities
- C3 Cultural and leisure facilities
- C6 Access for all
- E2 Employment premises and sites
- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design
- TC2 Camden’s centres and other shopping areas
- TC4 Town centre uses
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development

### The London Plan (2021)

- GG1 Building strong and inclusive communities
- D4 Delivering good design
- D5 Inclusive design

- D11 Safety, security and resilience to emergency
- D12 Fire Safety
- D14 Noise
- S1 Developing London's social infrastructure
- E9 Retail, markets and hot food takeaways
- HC5 Supporting London's culture and creative industries
- T5 Cycling
- T6 Car parking

## Other Material Considerations

### National Planning Policy Framework

- 4.7 In addition to the statutory development plan, the following documents are considered relevant and material to determining the application.
- 4.8 National Policy:
- 1 National Planning Policy Framework (NPPF) (December 2024)
  - 2 Planning Practice Guidance (2021)
- 4.9 Strategic and Local Guidance:
- 1 Camden Planning Guidance: Amenity (2021)
  - 2 Camden Planning Guidance: Design (2021)
  - 3 Camden Planning Guidance: Energy Efficiency and Adaptation (2021)
  - 4 Camden Planning Guidance: Town Centres and Retail (2021)
  - 5 Camden Planning Guidance: Transport (2021)

## 5.0 Policy Assessment

- 5.1 Planning applications should be determined in accordance with Section 38(6) of the Town and Country Planning Act 1990 which requires that they are “determined in accordance with the Development Plan unless material considerations indicate otherwise.”
- 5.2 Paragraph 11 of the NPPF also states that local planning authorities should approve proposals that accord with the development plan without delay.
- 5.3 This section provides an assessment of whether the proposals comply with the Development Plan policies outlined in Section 4.0 above, having regard to paragraph 11 of the NPPF.
- 5.4 From analysis of the statutory local plan, national policy and other material considerations, the following represent the key policy issues against which the planning application should be assessed:
- 1 Principle of development
  - 2 Design;
  - 3 Energy/ Sustainability;
  - 4 Transport; and
  - 5 Neighbouring Amenity.

### Principle of Development

- 5.5 The proposals will modernise and improve the existing community and cultural facilities offered. The increased capacity/floorspace will allow for the enhancement of faith based social action delivered by the Church. This accords with London Plan Policy GG1 and Camden Local Plan Policy C2 and C3. The site will be redeveloped with a church building of greater capacity and will provide rooms for the community to hire at a discounted rate.
- 5.6 The principal element of the development is the creation of a new, modern facility which incorporates a multi-use Church and community centre to provide faith based social action for the local and wider community. As established above, the principle of the replacement of the existing Church and the enhancement of the existing uses accord with the London Plan Policy GG1 and Camden Local Plan Policy C2 and C3.
- 5.7 In its assessment of the previous planning application the Council was clear in the committee report that the provision of a multifunctional Church, offering a range and extended use of facilities is supported. The committee report detailed that the Council welcomes investment by faith communities to develop new space to meet or worship, subject to other policies in the Local Plan (paragraph 4.39 of Local Plan). Local Plan Policy C2 supports the provision of multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community. The provision of additional floorspace in community use is therefore supported subject to the impacts of the development being acceptable.
- 5.8 Whilst the current scheme is paired back when compared to the previous planning application the principles remain this same and it is therefore assumed that officer support remains.

- 5.9 Overall, the proposed development provides improved facilities and support for a key community and cultural site, enhancing the local area. The proposal is in accordance with London Plan Policy GG1 and Local Plan Policy C2, C3 and E2.

## Design

- 5.10 Policy D3 of the London Plan states that development proposals should be of high quality, enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness. Local Plan Policy D1 also aligns with the London Plan and requires all development to be of a high quality design.
- 5.11 The existing Church dates from the 1970s, along with Leif House to the north of the site and Alban House to the east. The Church is a part one, part two story building which has little presence on Finchley Road due to its smaller scale in relation to adjoining sites of four to seven storeys and because it is set back from the predominant building line.
- 5.12 The proposed external appearance emphasises the civic character of the building. The combination of materials, fenestration proportions and arrangement, and pale colour palette creates a distinctive, modern and contrasting appearance to that of neighbouring buildings on Finchley Road. The proposed use of mesh panels in front of the glazing would assist with shading as well as add a level of texture and depth to the façade. In addition, the proposed steel frame, use of timber, and insulated render, is beneficial to reduce the development's impact on the environment and to reduce construction time.
- 5.13 Following the pre-application in January 2025, the design has been developed and modified in response to the officer's comments. A summary of these changes is provided below:
- 1 The existing cross is moved to the roof to emphasise the corner (and add 'interest').
  - 2 The entrance has been set back slightly, the corner column is smaller than the others and clad in timber to read as the door frames. As well as the front glazing continuing down the side to appear more 'open'.
  - 3 A bench has not been included at the front of the building as it may attract anti-social behaviour.
  - 4 Instead, greenery has been included in the current proposal - in front of each glazed bay at the front and next to the side entrance.
  - 5 Render on the facade has been chosen as the preferred finish for a number of reasons. The proposed acrylic based render is much more durable than the cementitious type. Furthermore, the colour will be an off-white/buff (not pure white) and will be coated with a clear render protector to provide greater longevity and prevent algae/ pollution build-up.
- 5.14 Overall, the proposed building is well designed, attractive and of a high quality which would be an improvement to the existing building and enhance the local area. The proposal is in accordance with London Plan Policy D3 and Local Plan Policy D1.

## Accessibility

- 5.15 London Plan Policy D5 states that development proposal should achieve the highest standards of accessible and inclusive design which includes being able to be entered,

used and exited safely, easily and with dignity for all. Local Plan Policy C6 seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The Council expects all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

- 5.16 The proposed building would meet Disability Discrimination Act (DDA) requirements in the public areas to accommodate disabled users and staff. The front entrance would provide level access and the building would include lifts and wheelchair accessible WC's. The proposal is therefore in accordance with London Plan Policy D5 and Local Plan Policy C6.

## Energy/ Sustainability

- 5.17 To ensure that these proposals are in line with emerging energy and sustainability standards, this section has assessed this proposal in line with Camden's Draft Local Plan.
- 5.18 Camden's Draft Local Plan Policy CC5 addresses how energy reduction measures should be targeted through adaptations and improvements to existing buildings. In addition, Policy CC8 ensures that development is designed to minimise overheating and promote cooling.
- 5.19 The Energy Report and Sustainability Statement prepared by Skelly & Couch summarises the proposed sustainable design strategy for the church building, appropriate to the minor nature of the application, in line with Camden's 'Draft Local Plan 2024', as published by Camden Council.
- 5.20 This report sets out the energy efficiency strategy for the scheme. This follows an energy hierarchy approach and outlines that passive design measures will be utilised where possible to reduce energy demand, efficient services to use the required energy efficiently will be adopted, and low and zero carbon technologies will be implemented to further reduce the energy consumption and reduce carbon emissions.
- 5.21 The Overheating Study prepared by Skelly & Couch (attached in Appendix 1 of the Energy Report and Sustainability Statement) highlights that, whilst the initial modelling indicated that overheating may be problematic within the building, following the application of a passive design measures it is anticipated that overheating can be mitigated by the introduction of 30mm of Fermacell lining to all walls.
- 5.22 Reducing solar gains to the café is vital so a horizontal overhang has been incorporated to the glazed front façade and the stone columns have been designed to protrude forwards a minimum of 200mm. Ventilation controls have been kept as simple as possible and instead thermal mass solutions are favoured to make the building as easy to maintain as possible. Additionally, ventilation has been capped at a maximum capacity of 50% between the hours of 11pm-6am to adhere to noise restrictions.
- 5.23 The Daylighting Study concludes that following some minor tweaks to the building form, the key occupied spaces achieve a daylight factor of 2. Some of the spaces, however, see a lower uniformity. It is deemed appropriate to focus on achieving a good daylight factor to the spaces, with as best uniformity as achievable without introducing more glazing. It is important to consider that as more glazing is

introduced, the risk of overheating to the spaces becomes greater. This is particularly prominent within this building, due to the building orientation, existing lightweight structure, and site constraints.

- 5.24 Overall, the proposed energy strategy meets the requirements of policies CC5 and CC8 and, when implemented, will provide an energy efficient and sustainable development.

## Transport

- 5.25 Local Plan Policy T1 requires that to promote sustainable transport choices, development should prioritise the needs of pedestrians and cyclists and ensure that sustainable transport will be the primary means of travel to and from the site. In addition, Policy T2 promotes reducing the number of cars to promote car-free developments.

- 5.26 The site is very well served by existing public transport services, being located opposite Finchley Road underground station and a variety of bus services. This is also supported through the site's PTAL score of 6b, demonstrating that the site has an excellent level of accessibility to public transport.

## Parking

- 5.27 The Church has two car parking spaces, located to the north of the site. These spaces shall remain as existing.

## Cycles

- 5.28 There are no current cycle parking spaces on site but it is proposed that 6 new secure spaces are created in the small external space to the south/east.
- 5.29 Cycle parking spaces have been calculated in line with the London Plan requirements for minimum cycle parking standards. Camden policy requires an additional 20% on top of London Plan requirements. Churches fall within category D1(other) and need 1 long stay spec for every FTE member of staff, as well as 1 short stay space for every 100m<sup>2</sup> GEA. GEA uplift for the new-build element is 132m<sup>2</sup>, which equates to 2 new spaces. Therefore, one space is required for staff, and Camden's additional requirement brings this to a minimum of 4 new spaces in total.
- 5.30 In addition, there are many short stay spaces nearby along Finchley Road and two large clusters of cycle stands on the opposite side of the road (totalling 42 spaces).
- 5.31 Further information on Transport is provided by RGP consultants in the Transport Assessment.
- 5.32 Overall, the Transport Assessment and measures to support sustainable transport meets the requirements of policies T1 and T2.

## Neighbouring Amenity

- 5.33 Policies A1 and A4 of the Local Plan seek to protect the quality of life of occupiers. This policy notes that one of the factors to consider includes noise and vibration. Noise and vibration is required to be controlled and managed. The Environmental Noise Survey and Plant Noise Impact Assessment prepared by Quantum Acoustics has ensured that this development will not produce any adverse effects relating to noise.

- 5.34 This assessment has proposed the environmental plant noise emission criteria based on the noise survey results and in accordance with the relevant guidance including the Local authority's requirements. The environmental noise emissions from indicative plant selections have been assessed to noise sensitive receptors and suggests that environmental plant noise emissions will comply with the proposed criteria if the suggested attenuation is implemented. Compliance with the proposed plant noise emission criteria will ensure the proposed plant has no significant adverse noise impact on nearby noise sensitive receptors.
- 5.35 Overall, the Environmental Noise Survey and Plant Noise Impact Assessment and proposed attenuation supports Local Plan Policies A1 and A4.

## 6.0 Conclusion

- 6.1 This Planning Statement has been prepared by Lichfields on behalf of Lighthouse London. It accompanies an full planning application for the extension, remodelling, and refurbishment of the existing Holy Trinity Church, Finchley Road, NW3 5HT.
- 6.2 The new proposal is based on an amended design approach to that previously recommended for approval, one which is more holistic and retains much of the existing building with a focus on retrofitting through improving the fabric, upgrading energy efficiency and creating a series of new spaces which are uplifting, fit for use and accessible for all.
- 6.3 As set out in Section 5.0 the proposals accord with the principle of adopted and emerging planning policy. This includes the principle of development, design, sustainability, transport and amenity. No significant adverse impacts have been identified as a result of this proposal.
- 6.4 Based on the assessment in section 5.0 the proposal accords with the statutory Development Plan. In line with section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should therefore be approved without delay.