

Our Ref: P256595
13 May 2025

Mr Brendan Versluys
Camden Council
5 St Pancras Square
London N1C 4AG

By Email: Brendan.Versluys@camden.gov.uk

Dear Brendan,

Application reference 2025/1489/P

Extension and refurbishment of the existing church building including an ancillary cafe and new level access from Finchley Road. Holy Trinity Church Finchley Road London NW3 5HT

I am instructed to write to you on behalf of Alban House (Hampstead) Limited (AHHL). AHHL is the freeholder of Alban House, the residential apartment block that directly adjoins the eastern boundary of Holy Trinity Church. AHHL collectively represents the interests of the individual flat owners within Alban House.

Our client understands the church's desire to improve its facilities and the services that it can offer. However significant concerns do arise in respect of a number of the detailed aspects of the proposal and the way in which it may impact the residential amenity and functionality of Alban House both during the construction phase and then when operational over the lifetime of the enhanced building.

This submission sets out these concerns which cover the following broad areas:

- Noise Impacts: Plant noise and noise breakout from the use of the building.
- Visual Impacts & Privacy: The additional massing proposed, treatment of the roofscape adjacent to Alban House and the impact of the proposed skylights.
- Lack of Greening: The application fails to provide greening and encourage biodiversity
- Construction & Servicing Arrangements: How this will impact Alban House.
- Fire Safety: Potential fire spread to Alban House
- Security: Roof access impacting security of Alban House

Noise

Local Plan Policy A1 advises that new development should ensure that neighbours are protected from adverse amenity impacts including noise. Policy A4 then states that:

*"We will only grant permission for noise generating development, including any plant and machinery, **if it can be operated without causing harm to amenity.**"*

Proposed Plant

The application proposes the installation of two Air Source Heat Pumps (ASHP) and three Air Handling Units (AHU's) to serve the refurbished building. The plans show that these would be set at second floor / roof level within a screened enclosure at the front of the building adjacent to Finchley Road. The Acoustic report prepared by Quantum Acoustics identifies two main sensitive receptors, firstly the residential accommodation at 'The Quarters', just to the south of the site and then the flats within our clients

property at Alban House directly to the east. Based upon the specification of the ASHP's and AHU's the report concludes that:

*"7.6 If the plant and screen are such that there is a line of sight to any windows of R1 or R2, our calculations indicate that that an attenuation package to the ASHP units giving 18dB would be required. **If the plant and screen height can be located such that there is no line of sight (as appears likely), attenuation of -13dB would be required. In order for only a -8dB attenuation package to work for the daytime, the screen/ASHP would need to be configured such that the line of sight is more than fully interrupted from all parts of the units.***

*7.9 Our report is **based on daytime running**, the night-time criteria is more onerous. **Reduced duty running and night-time setback modes will be required overnight to reduce levels by -7dB in addition to the attenuation specified for daytime running.**"*

There are a number of concerns and queries arising from this.

Firstly the noise report provides guidance on the level to which the units need to be attenuated rather than confirming that what is shown on the application drawings does meet the attenuation requirements. It also highlights that even with the suggested mitigation the proposed units would not comply with Council standards unless they are adjusted to reduced running set back modes overnight.

It is respectfully our submission that the Applicant must provide confirmation that the screening currently shown on the drawings is sufficient to meet the daytime noise requirements. This is important firstly from a noise perspective but secondly from a visual impact perspective. If ultimately a greater level of attenuation is required than is actually shown and this would raise the height of the screening currently proposed this should be understood and determined now.

The manner in which the reduced overnight running would be secured must also be considered. In this regard it is noted that paragraph 5.22 of the Planning Statement explains:

*"..... Additionally, ventilation has been **capped at a maximum capacity of 50% between the hours of 11pm-6am to adhere to noise restrictions.**"*

We ask that the applicants should provide details of how the system that will ensure that the units automatically switch to a reduced running mode at 11pm i.e. to confirm this is technically possible.

Noise Breakout from the Building

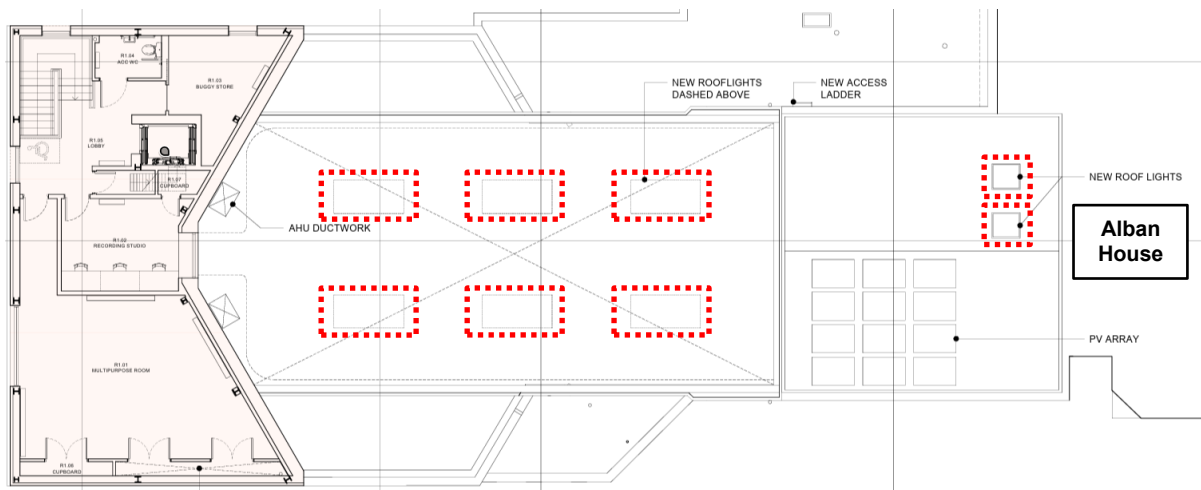
Whilst the application does not propose a 'change of use' it does understandably seek to enhance the buildings useability and includes a large worship space, café, recording studio and other multi-purpose spaces.

The building frontage will be of wholly new construction and the main central worship space substantially renovated with new roof including a number of large rooflights. The submitted acoustic report only addresses noise generated from the plant, it ignores the recording studio and does not consider potential noise breakout from the new and refurbished building associated with its use.

Of particular concern to Alban House is the potential noise breakout from the new rooflights above the main stage and worship space. As shown on the following photograph the existing roof is solid without any window openings.

However six new rooflights are proposed in the main roof and two further within the smaller section directly adjoining Alban House.

The plans do not provide sufficient detail to determine whether the rooflights would be openable or simply fixed panes. If openable clearly this has the real potential to result in noise impacts for Alban House. Even if the rooflights are to be fixed no detail has been provided in terms of the acoustic properties of the glazing. An assessment is required in this regard.



Plan as proposed



Current roof directly adjoining Alban House



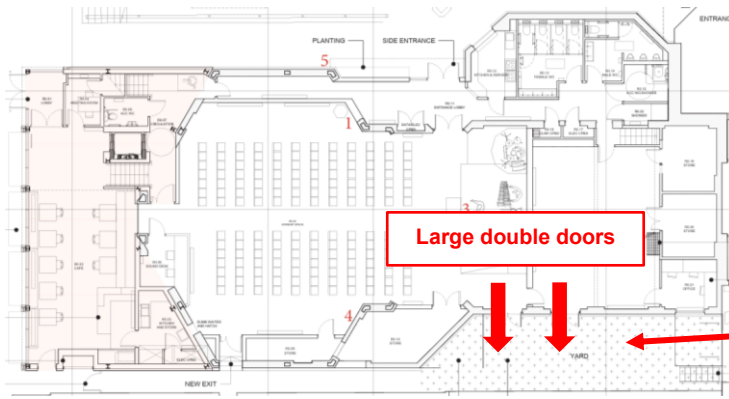
View showing relationship of roof to Alban House

In addition to the rooflights, concerns are also raised regarding the potential for an increase in the intensity of use to the south side of the building as shown on the following page.

At present this space is largely unused but the proposed plans show two sets of double doors opening out onto this space. The area is within very close proximity of the front windows and balconies of the Alban House properties and the rear windows of The Quarters. If the doors are left open during services or performances this would result in significant noise concerns.

Similarly the use of this space as a breakout area where people may gather has the potential to cause noise and disturbance for the residents of Alban House and The Quarters. The application should clarify the applicants intent for this space so that the impacts can be considered as part of the application.

Finally the plans show a bell of reasonable scale located to the north side of the building. Its use is unclear. However by its nature subject to its proposed use / frequency of use it is likely to cause disturbance to Alban House residents. This matter is not addressed in the acoustic report or elsewhere in the application package. This matter should be clarified by the Applicant.



Ground floor plan

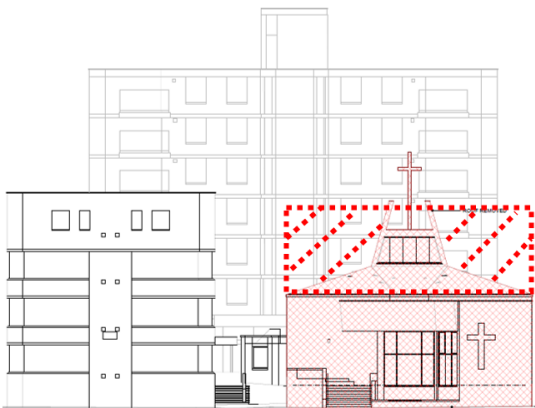


View along south side of building

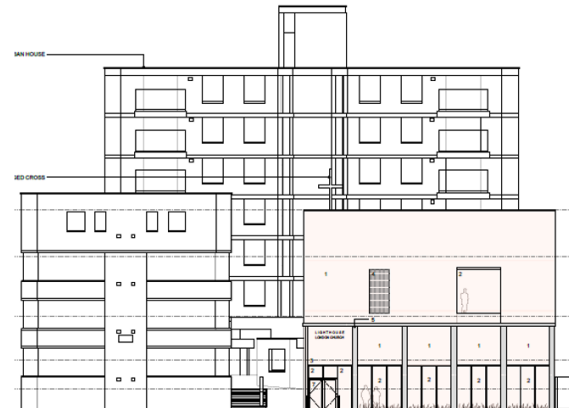
Visual Impacts, failure to provide 'greening' and encourage biodiversity

Local Plan Policy A1 states that new development must ensure appropriate outlook and privacy is maintained for existing neighbours and the impacts of artificial lighting should be considered. Policy D1 seeks good sustainable design "incorporating best practice in resource management and climate change mitigation and adaptation" and that new "incorporates high quality landscape design and "opportunities for greening". This is further emphasised in Policy CC01.

As shown below the proposed works will increase the apparent bulk and massing of the building in front of Alban House.



Existing elevation with additional massing added

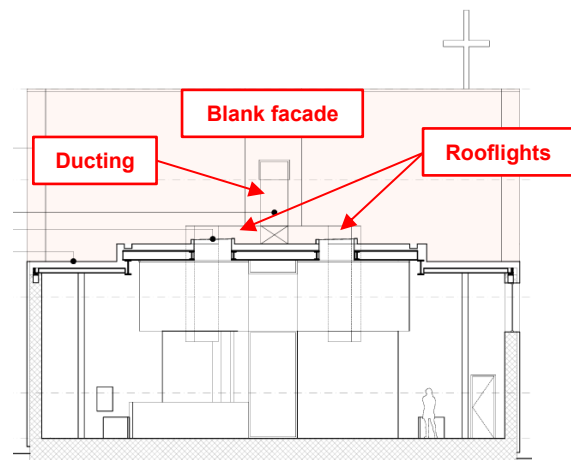


Front elevation as proposed

As shown opposite, the rear (east) elevation facing Alban House is proposed to be a blank rendered façade with plant ducting running down from the plant area onto the replacement flat roof.

The flat roof itself is proposed to be punctuated by rooflights as noted above in the context of the comments provided on noise issues.

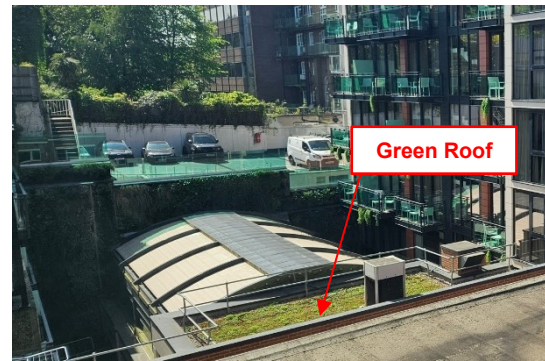
In summary where residents currently look out past and around the conical shaped rood this outlook will be removed (particularly for those at 2nd and 3rd floor levels) and replaced with a full blank wall removing this sense of space.



Proposed elevation view from Alban House

These changes will clearly harm outlook, reduce the sense of openness and particularly at night draw the eye with large light rooflights being visible just in front of the flats at Alban House.

These harmful impacts could in part be mitigated through the provision of some greening in this area to soften the outlook and disguise the blank façade and ducting. A green roof, similar to that provided at the recent redevelopment of The Quarters (see opposite) would also assist in terms of mitigating the appearance and prominence of the rooflights. It would also assist in promoting biodiversity and addressing climate change.



View showing the green roof at The Quarters

The prominence of the rooflights also raises concern that these could result in direct intervisibility between the main worship space and the front windows and balconies of the Alban House flats. Even if some film or treatment were to be applied to reduce this, there will remain a perception of lost privacy arising from these elements.

Construction & Servicing Arrangements

Local Plan Policy A1 advises that the Council will seek to protect the quality of life of occupiers and neighbours. As a result planning permission will not be granted for development that is likely to cause unacceptable harm to amenity.

The Policy advises that factors that will be considered include, transport assessments, travel plans, Delivery and Servicing Management Plans and

*“i. **impacts of the construction phase**, including the use of Construction Management Plans”*

The supporting text to the Policy clarifies that the Council will:

*“6.14require Construction Management Plans to identify the potential impacts of the construction phase **and state how any potential negative impacts will be mitigated**”.*

The Draft Construction Management Plan provided with the current application advises that “Pre-planned construction deliveries will load / unload from Sumpter Close where possible”. The area directly behind Lief House is shown as being available for loading for “light vans and smaller”.



Extract from the Applicants draft Construction Management Plan

It is necessary to highlight that the indicative material / plant laydown area (shaded light blue on Applicants aerial plan) is currently part of a car park regularly utilised by vehicles as is the proposed loading area as shown in the following photograph.



Picture showing parking area behind Lief House

The Delivery & Servicing Management Plan also comments that “there are various opportunities for loading and servicing within the immediate vicinity of the site”. As with the Construction Management Plan it again suggests that the central section of the car park (shown blue on the picture above and noted as proposed loading area) would be also used as a turning area

These proposals raise a number of significant concerns:

1. The use of the area directly behind Lief House as a materials and plant storage area would require the use of at least one of the existing car parking spaces that are not owned by the applicant. No evidence that this is possible has been provided.
2. The proposed parking and turning area within the car park would as a matter of fact lead to periods when this area would be blocked. This would impact cars accessing or leaving the Alban House car park which sits beneath the building. Clearly this is inappropriate and would not be possible as Alban House enjoys an uninterrupted right of access over this area.
3. There are a high proportion of elderly residents living within Alban House. The car park is used regularly by ambulances and cannot be blocked for obvious reasons.
4. The proposed materials, plant and unloading area are all just in front of the main access to Alban House and would result in both visual amenity and noise impacts for the residents.

Fire Safety

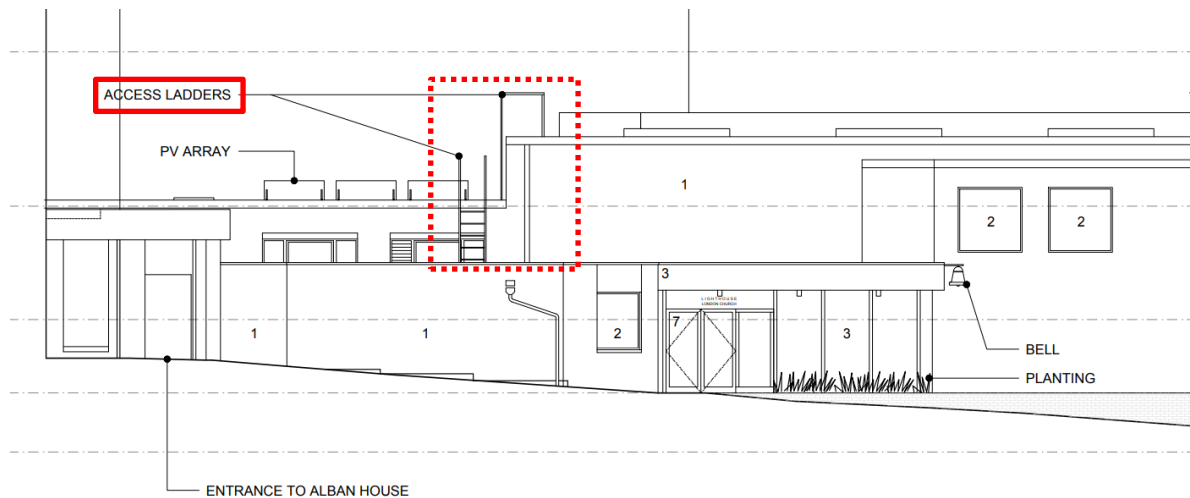
Whilst the submitted Design & Access Statement includes a short page of text with accompanying fire plans the application is not accompanied by a full Fire Safety assessment prepared by a Fire Consultant.

Alban House directly adjoins the site and is considered a high risk building in Fire terms. AHHL hold concerns that the proposals do not adequately consider the potential risks arising from a fire in the main building which adjoins the base of Alban House and / or from a plant fire on the roof / within the proposed plant area.

We ask that a comprehensive fire strategy report / review is undertaken in accordance with Policy D12 of the London Plan.

Building Security

The application proposes to install ladders to aid access to the flat roof area as highlighted in the elevation extract below.



As may be appreciated the first floor flats at Alban House benefit from front balconies which sit almost level with the flat roof at the application site. It would be very easy for a person accessing the roof of the church to then access the balconies of the flats causing an obvious safety risk as highlighted opposite.

AHHL ask that these permanent ladders are omitted from the scheme as they are likely to encourage the unauthorised use of the roof and represent a security risk for Alban House.



View showing the proximity of the roof to the balconies

Objection Summary

AHHL hold the following concerns regarding the current application.

Noise impacts:

- It is not clear from the submission whether the screens shown have been designed to meet the attenuation levels acknowledged to be required. It is important that this is clarified to avoid a situation arising whereby either the mitigation is not possible or much higher screening not currently proposed or anticipated is required.
- The acoustic assessment advises that the plant would not comply with required noise standards unless a reduced running mode is used after 11pm. The practicality of this should be demonstrated and compliance with this should be a condition of any permission granted.
- The submitted acoustic report does not consider noise breakout from the building, in particular from the rooflights and doors to the south side of the building. Alban House directly adjoins the church and noise from open windows and doors would clearly impact the flats to the front of the building.
- Even if the rooflights are to be fixed an assessment of their acoustic properties and so ability to prevent noise disturbance should be provided.
- The report does not consider potential noise impacts arising from the proposed recording studio or the new external bell.

- Any consent granted should be subject to appropriate conditions requiring the rooflights to be fixed shut and meet relevant acoustic standards. Similarly conditions should require doors to be retained closed during performances to reduce the impact on Alban House.

Visual Impacts & Greening:

- The proposal would add significant massing in front of Alban House reducing outlook from and the sense of openness enjoyed by the lower floor flats at the frontage.
- In addition, little consideration has been given to the outlook from the flats with the new built form that would be visible comprising a blank façade, plant ducting and a new roof punctuated by eight skylights. The blank façade and ducting provides a poor outlook and the rooflights would be a visual intrusion that would draw the eye at night.
- These aspects could be mitigated to a degree by the provision of a green wall to the rear façade and a green roof similar to others in the area (The Quarters). The provision of some greening in this area would also assist in terms of meeting urban greening and biodiversity net gain targets in the borough.
- Some greening of the roof would also assist in minimising the impact of the rooflights and so the perception of intervisibility and lost privacy for the front facing flats within Alban House.

Construction and Servicing

- The construction and delivery / servicing plans both rely upon the use of Sumpter Close for setting down of materials, storage of plant and materials and for access from smaller vans which it is suggested could unload and turn in this area.
- Sumpter Close is the main vehicular access to Alban House. Alban House has 18 parking spaces beneath the building that use this access regularly. It is also the main fire escape such that it cannot be blocked.
- Sumpter Close is also the main access used by emergency vehicles (ambulances) accessing Alban House, again a reason that it cannot be blocked.
- The area shown for use for materials storage and unloading is part of a commercial car park. The applicant has not provided any evidence to confirm that the owners of the car park would permit its use for these purposes. The area lies outside of the application red line area and is not included within any blue land within the Applicants control.

Fire Safety

- The application is not supported by a detailed Policy D12 Fire Risk Assessment. This is a significant concern to AHHL given the high risk nature of Alban House.

Security

- The proposal raise security issues for the frontage flats within Alban House as a result of the proposed roof access ladders.

Conclusions

As noted in the introduction to this letter AHHL do not object to the principle of the improvement works proposed at Holy Trinity Church. However in their current form our clients do object in respect of:

Noise Impacts:

- There is a lack of clarity in terms of the plant noise impacts, the adequacy of the screening currently shown and the lack of information regarding reduced nighttime running.
- No consideration has been given to noise breakout from the building, particularly in respect of the proposed skylights and south side doors.
- Given these issues the proposal does not accords with the requirements of Local Plan Policies A1 & A4 as the application does not ensure the amenity of its neighbours would be maintained.

Visual Impact:

- The closure of the space between The Quarters and Lief House will adversely impact outlook from the flats at Alban House. Outlook will be toward a blank façade, some plant ducting and eight skylights.
- This does not represent high quality design, fails to take opportunities for urban greening and biodiversity enhancement and would harm the residential amenity of the flats within Alban House, particularly those to the front at the second and third floor levels.
- Given these issues the proposal would impact the amenity of the Alban House residents, does not represent good design, does not take opportunities for greening and biodiversity enhancement and so does not accord with the requirements of Policies A1, D1, CC01

Constriction and Servicing Impacts:

- The proposal is seeking to utilise Sumpter Close for construction and delivery access. As currently set out in the submitted documents there is significant concern that the proposals are not feasible.
- The plans seek to utilise space that provides access to Alban House (car park and main pedestrian access) and is used as a commercial car park.
- It is not clearly evidenced that the applicant has rights to utilise these areas. The proposal does not therefore comply with Policy A1 and the supporting text that requires the submission of a Construction Management plan that demonstrates how construction impacts will be properly mitigated.

Fire Safety:

- In the absence of a full and detailed fire safety report the proposal does not comply with London Plan Policy D12.

Security

- The proposal has the impact of reducing the security of the flats within Alban House.

For these reasons and in its current form we ask that the application is refused. Should the applicant provide amended plans with the aim of addressing these and any other matters arising from the consultation process our client would be happy to review this objection and provide updated comments as necessary.

Yours sincerely,

Paul Watson

Phillips Planning Services Limited