

<b>Address:</b>	<b>Parker House 25 Parker Street London WC2B 5PA</b>	
<b>Application Number:</b>	2012/6132/P	<b>Officer: Amanda Peck</b>
<b>Ward:</b>	Holborn & Covent Garden	
<b>Date Received:</b>	14/11/2012	
<b>Proposal:</b> Redevelopment of the site to provide 43 residential units (40 x private and 3 x affordable) within a six storey plus basement building and retention of the existing façade to Parker Street, following demolition of the existing hostel accommodation and former Aldwych Workshops on Parker Mews and associated storage, cycle parking, refuse and landscape works (Class C3).		
<b>Drawing Numbers:</b> 1588(PL) 101 P1; 102 P1; -111 P1; -112 P1; -113 P1; -114 P1; -115 P1; -116 P1; -117 P2; -121 P1; -122 P2; -123 P1; -131 P1; -132 P1; -200 P2; -201 P1; -202; P1 -203 P2; -204 P2; -205 P3; -206 P2; -207 P1; -208 P2; -211 P2; -212 P1; -213 P1; -214 P3; -215 P3; -216 P1; -217 P1; -218 P1; -221 P1; -222 P1; -223 P1; -224 P1; Planning, Design and Access Statement prepared by Paul Davis & Partners and Tibbalds Planning & Urban Design; Archaeological Desk Based Assessment prepared by CGMS; Draft Construction Management Plan prepared by EC Harris; Daylight & Sunlight Report prepared by GVA; Energy/ Renewable Statement prepared by Sustain Ltd; Sustainability Statement, prepared by EC Harris; Historic Building Report prepared by Donald Insall Associates Ltd; Transport Statement prepared by Peter Brett Associates; Tree Survey/ Arboricultural Statement prepared by CBA Trees; Noise Assessment prepared by Peter Brett Associates; Basement Impact Assessment prepared by Rolton Group Ltd; Flood Risk Assessment (BREEAM) prepared by Rolton Group Ltd; Ecology Assessment (CfSH) prepared by the Ecology Consultancy; Statement of Community involvement prepared by E C Harris; Parker House – offsite affordable housing offer Tybalds Estate prepared by Tibbalds January 2013; Lifetime Homes Compliance Checklist 4 <sup>th</sup> January 2013; Demolition and Construction Noise Assessment prepared by Peter Brett Architects 7 <sup>th</sup> February 2013; Site Waste Management Plan prepared by Keltbray 22 <sup>nd</sup> January 2013; Outline Demolition Method Statement prepared by Keltbray 24 January 2013; Demolition noise level plans prepared by Peter Brett Architects February 2013; Tibbalds email 7 <sup>th</sup> February 2013 entitled Cycle stores: Parker; Tibbalds letter 9 <sup>th</sup> January 2013 entitled Additional Information to support Parker House Application; Tibbalds letter 1 <sup>st</sup> February 2013 entitled Parker Street- Additional Information; Tibbalds letter 7 <sup>th</sup> February entitled Response to St Joseph's RC Primary Schools letter of 9 <sup>th</sup> January 2013; GVA Grimley letter 23 January 2013 and associated appendices entitled Parker House, Parker St & St. Joseph's School – Daylight & Sunlight; Amended Schedule of accommodation entitled 5357 Master Schedule_all units 080213 Final3(3)		
<b>RECOMMENDATION SUMMARY: Grant Planning Permission Under Regulation 3</b>		
<b>Related Application</b>		
<b>Date of Application:</b>	14/11/2012	
<b>Application Number:</b>	2012/6143/C	

<b>Proposal:</b> Demolition of all parts of the building behind the existing retained façade on Parker Street and the demolition of the former Aldwych Workshops on Parker Mews.	
<b>Drawing numbers:</b> 1588(PL) 101 P1; 102 P1; -111 P1; -112 P1; -113 P1; -114 P1; -115 P1; -116 P1; -117 P2; -121 P1; -122 P2; -123 P1; -131 P1; -132 P1; Planning, Design and Access Statement prepared by Paul Davis & Partners and Tibbalds Planning & Urban Design; Building Report prepared by Donald Insall Associates Ltd.	
<b>RECOMMENDATION SUMMARY: Grant Conservation Area consent</b>	
<b>Applicant:</b>	<b>Agent:</b>
London Borough of Camden 33-35 Jamestown Road London NW1 7DB	Tibbalds Planning and Urban Design Ltd 19 Maltings Place 169 Tower Bridge Road London SE1 3JB

### ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace
Existing	C2 Residential Institutions		3,707m <sup>2</sup> (GEA)
Proposed	C3 Dwelling House		5,305m <sup>2</sup> (GEA)

Residential Use Details:										
	Residential Type	No. of Bedrooms per Unit								
		studio	1	2	3	4	5	6	7	8
Existing	Flat/Maisonette	0	0	0	0	0	0	0	0	0
Proposed	Flat/Maisonette	1	13	20	9	0	0	0	0	0

## **OFFICERS' REPORT**

**Reason for Referral to Committee: The application is being reported to the Committee as it involves the demolition of a building in a conservation area [Clause 3(v)] and is a Major development which involves the creation of more than 10 new dwellings [Clause 3(i)]**

### **1. SITE**

- 1.1 The application site is located on the northwest side of Parker Street in close proximity to the junction with Newton Street to the east and Parker Mews to the west. The hostel building is a large Victorian purpose built hostel that is four-five storeys in height. The building was designed in 1893 by Gibson and Russell who were part of the design team for the London County Council (LCC) as public housing. It is currently occupied as a 120 bed hostel for single men. West of the hostel building is Aldwych Buildings; a five storey residential building that formed part of the original LCC scheme for public housing. Aldwych workshops are located to the rear of Aldwych Buildings, and this is a largely single storey building (with a small two storey element) currently used for refuse storage, a caretakers room, small ancillary office space including a TRA room. The application site consists of the main hostel building and Aldwych workshops.
- 1.2 The buildings are not listed, but are located within the Seven Dials (Covent Garden) Conservation Area and are noted as being positive contributors. The site is also within an area identified as being susceptible to ground water flooding and has slope stability issues. The New London Theatre dominates the western end of Parker Street. To the rear of the site are residential flats at Powis House, Macklin Street and St Joseph's Primary School. To the north east (along Parker Street), the adjacent building at 39 / 41 Parker Street is in commercial use.

### **2. THE PROPOSAL**

#### **Original**

- 2.1 The proposal includes the demolition of the hostel building and retention of the front façade and part of the side (west) façade. Aldwych workshops are to be demolished and replaced with a new building of similar height and footprint. The proposal would provide 43 residential units (40 private and 3 affordable) with the private units being 1 studio, 12 x 1 bed units, 18 x 2 bed units and 9 x 3 bed units and the affordable units being 1 x 1 bed and 2 x 2 bed units. The majority of the units are to be provided at the hostel building and two of the affordable units are provided at Aldwych workshops. A refuse area, small electricity sub station and caretakers room are also proposed at Aldwych workshops.
- 2.2 Various extensions and façade alterations are proposed to the hostel building as follow:
- Two storey roof top extension, stepping away and set back from Parker Street by 2.3m and 4.8m and from the rear by 2.3m and 5.5m
  - Two storey extension above existing single storey element adjacent to existing office building at 39-41 Parker Street and enlargement of ground floor window;
  - Alterations to existing top floor 'water tower' to make this feature narrower and

- slightly lower;
- Replacement of all windows to retained façades;
- Enlargement of windows within two existing stair cores and beneath 'water tower' at ground, first, second and fourth floor levels to the retained front façade;
- Reinstatement of window in place of existing main entrance and existing fire escape;
- New door for refuse lift adjacent to retained entrance on retained front façade;
- Excavation of new basement

### **Revision[s]**

- 2.3 The scheme originally included some affordable housing at another off site location (the basement of Great Russell Mansions), but these units have now been added onto the provision at the Tybalds Estate because of concerns regarding inadequate daylight, sunlight and natural ventilation at Great Russell Mansions.
- 2.4 Amendments have been made to the mix of units on site with the addition of 4 private 3 bed units in place of 2 bed units. The scheme originally included 1 x affordable wheelchair unit, but this has now been removed because it was not possible to provide a large enough unit to accommodate the relevant wheelchair turning circles. Additional information has been submitted with regard to viability, provision of affordable housing units on the Tybalds Estate, lifetime homes criteria, refuse storage, construction management, protected species study and contamination

## **3. RELEVANT HISTORY**

### Application site

- 2007/1523/P - Demolition of an existing glazed roof lean-to and replacement with the erection of a 'garden' pavilion in the rear courtyard and associated landscaping improvements. Granted 18 May 2007.
- 9000533 - The erection of a lift shaft, the installation of a lift and associated external alterations. Granted 29 January 1991.
- 8400899 - Alterations to the ground floor frontage involving the blocking up of door openings and the formation of a new doorway on the Parker Street elevation. Granted 22 August 1984.
- 31096 - Installation of a new fire door on the western end of the ground floor to the Parker Street frontage. Granted 2 October 1980.

### Mount Pleasant Hostel

- 2011/6016/P - The erection of a 3 storey extension to the east, a part 2 part 4 storey extension to the west of the site with roof terraces, new roof extension to the north block, external alterations to the façades, installation of windows and doors, amendment to boundary wall on Mount Pleasant, removal of staircase on Mount Pleasant, the installation of new cycle parking storage area to the front ground floor courtyard and associated works to create a central courtyard with hard and soft landscaping, to provide an additional 21 rooms to existing 31 room hostel (Sui Generis). Granted 11 May 2012

### Holmes Road Hostel

- 2012/6344/P - The erection of a part 3 part 2 storey extension to the south, new roof extension to rear and elevational alterations to retained building facing Holmes Road to provide an additional 16 rooms to existing 43 room hostel (Sui Generis) and ancillary office/commercial and storage space, following demolition of existing rear buildings to the south. Application currently under consideration.

## 4. CONSULTATIONS

### Statutory Consultees

#### 4.1 English Heritage

Do not wish to comment in detail but offer the following general observations:

- The existing building is considered to make a positive contribution to the significance of the Seven Dials Conservation Area and that significance lies principally with the existing street facade.
- The proposals comprise the retention and restoration of the street facade and redevelopment behind and above that facade.
- The significance of the building in relation to the conservation area is considered to be retained, subject to careful attention being given to the form, design and materials to be used on the set back storeys that would be visible above the existing roof form.

#### 4.2 English Heritage – Greater London Archaeology Advisory Service

- The site lies in an area where archaeological remains may be anticipated, and is within a designated Archaeological Priority Area. Archaeological remains from the immediate vicinity of the site date from the prehistoric, Roman, Saxon, medieval and post-medieval periods, and are commonly found at depth below present foundation levels. Of particular significance here is the close proximity of the site to the eastern extent of Lundenwic, a major Saxon settlement and mercantile port that was established in the early 7th century. Remains from this period would further refine the model of Saxon activity and expansion in the central London area, and would be considered of regional significance.
- The development proposals include the excavation of a new basement level behind the retained Parker House façade. Although there will be areas of localised truncation on the site, there does not appear to have been widespread excavation or basement levels. The proposed development may, therefore, affect remains of archaeological importance.
- In accordance with the recommendations given in the NPPF paragraphs 135 and 141, and in Camden LDF Policy DP25, a record should be made of the heritage assets prior to development, in order to preserve and enhance understanding of the assets. The archaeological position should be reserved by attaching a condition to any consent granted under this application requiring the submission of a written scheme of investigation, an appropriate mitigation strategy and an archaeological project design.

#### 4.3 Thames Water

- Requested condition regarding no impact piling until piling method statement submitted.
- Requested Informatives regarding non return valves, provision for drainage,

groundwater discharge permit and water pressure.

## **Conservation Area Advisory Committee**

### 4.4 Covent Garden Conservation Area Committee

Object because this is overdevelopment and the proposed roof treatment is too high and in inappropriate style and materials.

## **Local Groups**

### 4.5 Covent Garden Community Association

- No objection

### 4.6 Aldwych Buildings TRA

- Aldwych TRA has now been formalised no mention made in documents of the existing TRA room at Aldwych Workshops
- Disruption during construction.
- Character of the neighbourhood is informed and nourished by the homeless hostel.
- Health implications of the proposed substation in Aldwych Mews.
- Where would the freehold of the proposed development be? The community stands to gain nothing from these proposals and others do.

### 4.7 Aldwych Buildings Leaseholders Association (2 responses)

- The replacement storage areas in the courtyard would obscure existing windows to Aldwych Buildings
- The proposed 2 bed house in Aldwych workshops could house children and consequent noise and disturbance issues
- Existing intercom entrance at Aldwych buildings is not suitable for wheelchair access, how would a new wheelchair resident get access to the new unit at Aldwych workshops? The courtyard would need to be changed and the intercom entrance would need to be moved to outside resident's bedroom windows
- The existing roof terrace at Aldwych workshops is well used and there would be noise and disturbance issues for the new residential units at Aldwych workshops
- No mention of the existing TRA room in any application documents.
- The replacement storage is inaccessible as you would need to crawl inside to get access. Storage beneath stairwells would create noise and security problems. New storage would also destroy plants, trees and shrubs which have been here for 20 years
- The conversion of Aldwych workshops will increase service charges to leaseholders of Aldwych buildings
- The new house between Aldwych buildings and Parker St Hostel should not have access to the courtyard at Aldwych buildings as it has its own outside space and its own front door. If it is included in the Aldwych buildings estate it will add to service charges
- The electricity sub station has nothing to do with Aldwych buildings and should not be placed on our estate. It should be provided within the main building and will decrease property values in Aldwych buildings and have health implications.
- Impact on property prices and ability to sell units during construction at Aldwych buildings.

## Adjoining Occupiers

<i>Number of letters sent</i>	198
<i>Total number of responses received</i>	16
<i>Number of electronic responses</i>	0
<i>Number in support</i>	3
<i>Number of objections</i>	13

4.8 Objections from 4, 22, 23, 25, 30 Aldwych buildings; 3, 50 Winter Garden House, 2 Macklin Street; 2<sup>nd</sup> Floor New London House, 172 Drury Lane; 8 Parker Street (3 responses) for the following reasons:

- Why so few affordable homes? A minimum of 14-15 units would be more acceptable
- What will happen to the existing hostel residents. Homelessness is a large enough problem without removing this hostel.
- Slate roof and chimney pots should be retained
- Proposed development not in keeping with a listed building in the conservation area. The top floor has too much glass and is too modern in appearance.
- Additional storeys will impact daylight to courtyard at rear of Aldwych buildings
- Noise and disturbance from the new terraces and balconies
- Loss of privacy from windows on side elevation facing Aldwych buildings
- Loss of garden space to rear of Aldwych building
- There should not be any access to the existing courtyard for new residents – noise, privacy issues and it is unfair that private residents have access to the courtyard.
- There will be issues re noise from the existing roof terrace onto the new residential units in Aldwych workshops.
- Scheme would take away tenants ass meeting room and storage space in Aldwych buildings. No mention of TA room in any application documents.
- The replacement storage is inaccessible as you would need to crawl inside to get access. These units take up space in an already small courtyard space. Storage beneath stairwells would create noise and security problems. New storage would also destroy plants, trees and shrubs which have been here for 20 years.
- Object to the installation of a substation on Aldwych mews as it has nothing to do with the block at Aldwych buildings – there will be noise, pollution and health impacts from this.
- Noise, dust from construction
- Will residents have parking permits?
- The conversion of Aldwych workshops will increase service charges to leaseholders of Aldwych buildings
- Insufficient consultation has taken place

4.9 Support from Flat 2, 10 Macklin Street (2 responses) and flat 21 Aldwych Buildings for the following reasons:

- Development of new flats is preferable to the current situation
- Support the principal of making optimum use of Council owned property
- Design and external appearance of the proposed building is acceptable
- Should be a S106 for a car free development and provision of a car club in the area
- Should be a financial contribution towards wider refurbishment of Aldwych Buildings

amenity space

- Would like assurances re limiting noise and dust during construction and limits on hours and road closures

#### 4.10 St Joseph's RC Primary School (2 responses)

- No meaningful discussions with the applicants before application submitted – initial two meetings in June 2011 and June 2012 were at a very outline stage, DM forum in September 2012 was dominated by local residents groups and first meaningful meeting was October 2012 which was only 2 weeks before the application was submitted.
- Difficult to understand the proposed changes in relation to the school and clearer plans and cross sections would have been helpful
- It was suggested by the school in 2011 that an additional access to the school through the proposed development was desirable. The main school entrance on Macklin Street is onto a narrow footpath which gets crowded at top off and pick up times. A route through the application site directly into the playground would allow younger children to be picked up from the playground and to exit onto the much safer Parker Street. This route could be easily accommodated within the scheme with the loss of only one bedroom to the scheme. The principle of securing routes through buildings for public benefit is well established at Central St Giles and Centre Point
- Likely to impact daylight levels to classrooms and overshadowing to playground and this is not assessed in the submitted daylight/sunlight assessment.
- Lack of information submitted with regard to the impact of demolition and construction noise and vibration on the school.
- Concern regarding the construction impact on the school and the ability to continue teaching during the construction works
- Concern regarding method of construction and failure to consider alternative methods that would reduce the noise impact upon the school

## 5. **POLICIES**

### **National / Regional Policies**

London Plan 2011

NPPF 2012

### **LDF Core Strategy and Development Policies**

CS1 – Distribution of growth

CS3 – Other highly accessible areas

CS5 – Managing the impact of growth and development

CS6 – Providing quality homes

CS9 – Achieving a successful Central London

CS11 – Promoting sustainable and efficient travel

CS13 – Tackling climate change through promoting higher environmental standards

CS14 – Promoting high quality places and conserving our heritage

CS15 – Protecting & improving our parks and open spaces and encouraging biodiversity

CS17 – Making Camden a safer place

CS18 – Dealing with our waste and encouraging recycling



CS19 – Delivering and monitoring the Core Strategy  
DP2 – Making full use of Camden's capacity for housing  
DP3 – Contributions to the supply of affordable housing  
DP5 – Homes of different sizes  
DP6 – Lifetime homes and wheelchair homes  
DP8 – Accommodation for homeless people and vulnerable people  
DP16 – The transport implications of development  
DP17 – Walking, cycling and public transport  
DP18 – Parking standards and limiting the availability of car parking  
DP19 – Managing the impact of parking  
DP20 – Movement of goods and materials  
DP21 – Development connecting to the highway network  
DP22 – Promoting sustainable design and construction  
DP23 – Water  
DP24 – Securing high quality design  
DP25 – Conserving Camden's heritage  
DP26 – Managing the impact of development on occupiers and neighbours  
DP27 – Basements and lightwells  
DP28 – Noise and vibration  
DP29 – Improving access

### **Supplementary Planning Policies**

Seven Dials Conservation Area Statement 1998

Camden Planning Guidance 2011

## **6. ASSESSMENT**

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

- The loss of the sui generis hostel use
- Demolition within a conservation area
- Design
- Affordable Housing
- Standard of residential accommodation
- Amenity impacts
- Transport impacts
- Other issues – basement impact, Open space/biodiversity/trees, sustainable design and construction, archaeology, local employment and procurement, Community Infrastructure Levy (CIL)

### Loss of the sui generis hostel use

6.2 Policy CS6 indicates that the Council will seek a variety of housing types suitable for homeless people and vulnerable people. The supporting text to this policy then elaborates on the 'pathway' approach and that this has achieved a reduction of over 50% of the number of homeless households in temporary accommodation (paragraph 6.44). It acknowledges that there will be a reduction in the need for temporary accommodation in paragraph 6.45 accompanied by a need for fewer hostel places. Policy DP4 relates to the loss of existing affordable homes and includes hostels in this protection and guides the reader to policy DP8 with regard to proposals that affects

accommodation for homeless people and vulnerable people. Policy DP8 states that the Council will support development of pathway accommodation for vulnerable people that provides support tailored to an individual's needs and their progress towards independence. The council will resist development that involves the net loss of accommodation for homeless people or vulnerable people unless there is adequate replacement accommodation, or it can be demonstrated that the accommodation is no longer needed or is incapable of meeting contemporary standards. Supporting text to DP8 acknowledges that we do not need all our hostels (paragraph 8.7) and that some hostel sites will be released for the development of other types of housing, particularly affordable housing.

- 6.3 The 'Hostels Pathway Approach' has been adopted by the Council since April 2007 in order to increase the rate at which people move through temporary accommodation services into independent accommodation, so that rather than spending in some cases 10-20 years in these temporary accommodation services the average length of stay is now 2-3 years. In April 2011 the Council approved a strategy for three Council owned hostels in need of improvement: Mount Pleasant, Parker House and Holmes Road. This proposed the redevelopment of Parker House to enable finance for the refurbishment of the other two hostels. The focus of the refurbishment is to provide modern more self contained accommodation incorporating en-suite bedrooms and increased space for training and social enterprise activities. This application is therefore linked to the proposals at the Mount Pleasant and Holmes Road Hostels (see relevant history). The three hostels currently provide 194 beds in total (31 at Mount Pleasant, 43 at Holmes Road and 120 at Parker House) of 820 beds across the Borough in hostels and supported housing. The needs analysis undertaken as part of the April 2011 strategy concluded that, providing planned changes and improvements in the operation of the 'Pathway' were implemented effectively, the closure of the Parker Street hostel could be accommodated as long as 80-100 bedspaces were retained in total. Planning permission has been granted to increase the number of beds at the Mount Pleasant hostel to 52 and a planning application is currently under assessment to increase the number of beds at the Holmes Road hostel to 59. Taking the three sites together there would therefore be an overall provision of 111 bedspaces and a reduction of 83 bedspaces.
- 6.4 The loss of the hostel use at this site, along with the refurbishment and extensions at Mount Pleasant Hostel and Holmes Road, is therefore considered to be in accordance with policies CS6, DP4 and DP8. A condition is recommended requiring the implementation of the refurbishment and extensions to the Mount Pleasant Hostel and Holmes Road hostel prior to the implementation of the residential scheme at Parker Street.

#### Demolition

- 6.5 The Seven Dials (Covent Garden) Conservation Area Statement states that the north side of the street is largely occupied by two LCC buildings (Aldwych Buildings and Parker Street Lodging House) which gives the street a cohesive quality. It states that Gibson and Russell were known for a mild-Baroque style which used many decorative devices but due to a stringent budget for the Lodging House their normally decorative style was reduced to one feature; a bracketed entrance hood. It also states that Parker Street provides long views giving prominence to the facades and rooflines of the buildings and emphasising the cohesive quality of the area. Both Parker Street Hostel

building and Aldwych Workshops are identified as making a positive contribution to the Conservation Area. The proposal would result in the demolition and façade retention of the Parker Street Hostel building and the complete demolition of the Aldwych Workshops.

- 6.6 The main issue for consideration with regard to the demolition is the impact that the substantial demolition of the building would have on the significance of the designated and undesignated heritage assets having regard for the overall merits of the scheme.

### **Significance of buildings**

#### ***Parker House***

##### *Historic Value*

- 6.7 Parker Street and Macklin Street (formerly Lewknors Lane and later Charles Street) were formed in the early 17th century on the site of Rose Field; pastureland attached to the Rose Inn with a western boundary on Drury Lane. During the 19th century housing conditions seriously deteriorated around Parker Street, as in other parts of central London. In 1886 the medical officer of health for St Giles recommended that the area around Macklin Street and Parker Street should be cleared as the houses were beyond repair and severely overcrowded.
- 6.8 Following the slum clearances the London County Council (LCC) was created and given the duty to prepare schemes for the rearrangement and reconstruction of streets and houses within unhealthy areas. They also had the power to erect lodging houses and dwellings and the application site become one of the first public housing scheme in Camden and the first London County Council lodging house.

##### *Architectural Value*

- 6.9 The original design of the hostel building was of some quality, being designed by an architectural practice of note with several listed buildings to their credit (Gibson and Russell). The original design adopted a pavilion plan, which was seen as a means to improve ventilation and the supply of fresh air and hence reduce mortality rate. The hostel was not built to its original design and when it was opened in 1893 it bore little resemblance to the competition winning design and did not include the Arts and Crafts brick arcading, window detailing or the roof pavilions. The eventual (existing) building was much larger, far plainer and was arranged around three galleried halls, rather than two. The resulting 'E-shaped plan' rather than 'C' shaped plan form includes facades that are considered to be uninspired with an austere street frontage. The elevation lacks the massive presence that is a feature of Arlington House or the more forward looking Arts and Crafts influenced design of the listed LCC Carrington and Bruce Houses.
- 6.10 Externally the additional storey and water tower to the east end severely affects the symmetry of the front façade. The rear façade is not visible from the public realm. At the rear the eastern wing has been rebuilt and all original windows replaced with a moderate quality of materials and detailing. The fenestration is in the form of regularly spaced windows with a variety of original multi-paned sash windows, replacement timber sashes and replacement uPVC windows of various descriptions. The front section of the flank elevation matches the brickwork of the front façade with the back section and rear elevations being more utilitarian in appearance, constructed in a presumably cheaper dark brown stock brick.

- 6.11 At roof level there are two gabled roofs extending above the entrances towards the front elevation. At the south-western end is an attached two storey structure in stock brick and red brick; the upper storey has a pitched roof and is a later addition but sympathetically executed.
- 6.12 The building retains the original E shape form with projecting wings providing dormitories enclosing a multi storied central gallery lit from above. The layout is similar to that of early prisons, introduced around the same time. The form of the dormitories including the broad size of the rooms are as built although the original timber sleeping cubicles have been replaced with concrete blocks walls, and the ground floor which originally housed large and open plan communal rooms has been heavily subdivided.

#### *English Heritage*

- 6.13 The significance of the building was considered by English Heritage as part of a 'Certificate of Immunity from Listing' application in June 2012. The building was not considered to be of listable quality but English Heritage stated that the building was considered to be of:
- Historic interest as the first of the three model men's lodging houses constructed but the LCC between 1893 and 1907. As such it represents the earliest provision of social housing by the newly created LCC. In conception it predates the first privately financed houses and can therefore lay claim to being the first publicly funded social housing for working men in the capital
  - The E shaped layout providing dormitories enclosing a multi storied central gallery within each wing forms is also of interest.
  - Architecturally the building is modest. It lacks the sense of scale and quality and detailing of build seen in other similar aged buildings on the street and examples of other LCC lodgings.

#### **Impact on significance of the building**

- 6.14 Both buildings make a positive contribution to the character and appearance of Seven Dials Conservation Area and as such are classified as non designated heritage assets. The significance of the Hostel building largely consists of its historic interest as the first municipal housing social housing for working men in the capital as well as the E shaped form (although it should be noted that whilst the 'E' shaped plan form is significant it was never intended as part of the original design which showed a C shaped layout).
- 6.15 The proposal would result in the loss of the majority of the historic hostel building and the E shape plan, as well as Aldwych Workshops, and would result in substantial harm to the buildings' significance. The redevelopment would also see the demolition of the less significant parts of the hostel building's fabric. The front façade, although modestly adorned, is more decorative and comprises better quality brick and detailing than the rear facades. In addition the rear of the building has limited view from public or private realm reducing the impact on the Conservation Area.
- 6.16 Paragraph 133 of NPPF states that: "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

1. The nature of the heritage asset prevents all reasonable uses of the site; and
2. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
3. Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
4. The harm or loss is outweighed by the benefit of bringing the site back into use”.

6.17 Taking each point in turn:

1. The nature of the heritage asset prevents all reasonable uses of the site;  
The Council’s Directorate of Housing and Adult Social Care has confirmed that Parker House is no longer appropriate for on-going hostel use due to its size (the building provides too many bed spaces as modern providers seek sites of no more than 60 spaces); the supply of accommodation in the area (recently redeveloped high quality residential accommodation for homeless people in nearby Endell Street provided sufficient Pathways accommodation for the area); and the constraints of the existing building (conversion of the existing space into smaller hostel accommodation would be costly and problematic in design terms and would result in poor natural surveillance and on-going management problems). This is considered to be sufficient evidence to accept the building is no longer fit for modern day social care.
2. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;  
A series of options for the site has been explored including refurbishment of the existing building for residential accommodation and retention of as much of the existing building as possible including the ‘E’ shaped plan. Each option was appraised against the quality of residential accommodation provided (including daylight/sunlight, overlooking, flat sizes) and the application scheme has the greatest potential to deliver high-quality, modern, residential accommodation.
3. Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible;  
The building is already in public ownership and it has not been possible for the building to be retained.
4. The harm or loss is outweighed by the benefit of bringing the site back into use;  
The loss of historic significance has been carefully considered and the public benefits of the proposal are considered to outweigh the harm caused. The viability appraisals undertaken as part of the process demonstrate that all options for the site, including retaining the existing building, would provide funding to deliver improved, fit for purpose hostel accommodation at Mount Pleasant and Holmes Road (refer to paragraphs 6.30-6.34). The proposed scheme would maximise the overall delivery of affordable housing in the borough with a total of 46 affordable housing units. The proposed scheme would also maximise the amount of money for the Community Investment Programme (CIP), providing more than the options to retain the building.

### ***Aldwych Workshops***

#### *Historic and architectural value*

- 6.18 The Aldwych Workshops are a subordinate group of ancillary buildings in the rear courtyard of Aldwych Buildings. The former workshops are simple structures of the very late 19th century. They have limited publicly visibility with only obliquely from

Parker Mews but its form has modest charm as an example of 19<sup>th</sup> Century workshops, particularly the two storey 'house' to the east.

### **Impact on significance of the building**

- 6.19 The scheme would replace Aldwych Workshops in a like for like manner re-using the existing materials where possible (which is to be secured with a condition). This proposal is considered to preserve the character and appearance of the Conservation Area, particular given the limited views of the workshop building.

### **Conclusion**

- 6.20 For the reasons outlined above it is considered that the substantial harm from the demolition of the buildings is outweighed by the substantial public benefits created by the scheme in terms of affordable housing provision and CIP contribution.

### Design

- 6.21 The main issue for consideration is the impact that the new build elements of the scheme would have on the character and appearance of the Conservation Area.

### ***Parker House***

- 6.22 The proposed design of the new development takes account of the architectural qualities of the existing building and sufficiently reinforces the historic value and traditional style of the Victorian building. The proposed design would offer a robust sympathetic design which uses high quality contemporary materials which pick up the robust Victorian aesthetic.
- 6.23 The two storey roof extension, which steps back and inward from the principal façade, would largely be concealed from public view. The building is considered to be large enough to accommodate the scale of addition proposed at roof level without harming its form or proportions.
- 6.24 Other alterations and extensions include infilling above the existing single storey wing to the right hand side of the front elevation. This would enhance the symmetrical appearance and add public value to overall scheme. It would remain more than one storey below the parapet line to retain the gap between the buildings and not disrupt the parapet line of the existing building. The original entrance would be reinstated and windows on the front façade enlarged or added to better align with the scale and architectural composition of the building. At the junction with the existing and new fabric care has been taken to marry the materials and fenestration. The existing chimney on the flank elevation has been retained affording a natural division between old and new. A brick party wall up-stand is also to be erected above the retained flank elevation to provide a coherent language for the front section of the development.
- 6.25 The new build elements and amendments to the retained façade are considered to satisfactorily respond to the character and appearance of the retained front façade and the collection of later 19th Century blocks and warehouses which surround the site.

### Affordable housing:

- 6.26 Policy DP8 states that, where the Council is satisfied that a development involving the loss of accommodation for homeless or vulnerable people is justified, the development should include an appropriate amount of affordable housing, having regard to policy

DP3. The supporting text to Policy DP8 states that the criteria in DP3 will be applied along with any need to generate funding for replacement housing elsewhere for homeless people or vulnerable people. Policies CS6 and DP3 require all residential developments with a capacity to provide 10 units or more (or 1,000 sqm GEA or more) to make a contribution to affordable housing. Policy DP3 expects the affordable housing contribution to be made on site, but where it cannot practically be achieved on site the Council may accept off site affordable housing or exceptionally a payment in lieu. Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace. With the provision of 43 units and 5305m<sup>2</sup> (GEA) of residential floorspace the requirements of these policies have been triggered and the policy requirement is therefore for 2652m<sup>2</sup>(GEA) of affordable housing floorspace on site.

6.27 Policy DP3 goes on to list six criteria to be taken into account when assessing whether affordable housing can practically be provided on site as follows:

- Access to public transport, workplaces, shops, services and community facilities;
- The character of the development, the site and the area;
- Site size and constraints on including a mix of market and affordable tenures;
- The economics and financial viability of the development including any particular costs associated with it;
- The impact on the creation of mixed and inclusive communities; and
- Any other planning objectives considered to be a priority for the site.

The supporting text for this policy lists at paragraph 3.14 additional criteria to be taken into account which in summary are any physical constraints of the site; service charges which would be too costly; particular development costs; timings for affordable housing funding; and whether an off site contribution will maximise the overall delivery of housing and affordable housing.

6.28 The National Planning Policy Framework (NPPF) states at paragraph 50 that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends; and identify the size, type, tenure and range of housing that is required. It also states that where a need for affordable housing is established, policies should be set for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

6.29 The applicant has focused on whether there are any viability reasons why a policy compliant level of affordable housing cannot be provided on site, including whether the overall offer would be better with off-site provision. The proposal is for 3 social rented units to be provided on site (197m<sup>2</sup> GIA) and for 43 affordable units (2913m<sup>2</sup> GIA) to be provided off site at the Tybalds Estate as shown in the table below:

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total</b>
<b><u>Parker street</u></b>					
Social rented	1	2	0	0	3 (197m <sup>2</sup> GIA)
Private	13	18	9	0	40 (3087m <sup>2</sup> GIA)
<b><u>Tybalds Estate</u></b>					
Social rented	8	1	12	2	23 (1841m <sup>2</sup> GIA)

Intermediate	19	1	0	0	20 (1072m <sup>2</sup> GIA)
Total affordable	28	4	12	2	46 (3110m <sup>2</sup> GIA)

### Viability issues

- 6.30 The applicant has submitted a Financial Viability Assessment which considers the viability of the proposed scheme together with four alternative scenarios:
1. Redevelopment and façade retention ('C' shaped) with affordable housing provided off site (the application proposal).
  2. Redevelopment and façade retention ('C' shaped) with affordable housing provided on site
  3. Retention of the building ('E' shaped) with affordable housing provided off site
  4. Retention of the building ('E' shaped) with affordable housing provided on site
- 6.31 The Financial Viability Assessment concludes that the proposed scheme (option 1) would maximise the overall delivery of affordable housing in the borough with a total of 46 affordable housing units. The proposed scheme would also maximise the amount of money for the Community Investment Programme (CIP), providing more than the options to retain the building. The Tybalds Estate is within the ownership of the applicant and, at the time of writing, a planning application is expected to be submitted in February 2013. The applicant has therefore been able to demonstrate that there is some certainty that these affordable housing units can be provided 'off site'.
- 6.32 The Council has employed BPS Chartered Surveyors to independently review the information in the Financial Viability Assessment. BPS have advised that the methodology adopted by the applicant is sound, that the cost and value assumptions are in line with the market and that the build cost estimates are broadly reasonable. They accept the conclusion that the 'C shaped' option is more viable, and able to deliver a greater number of affordable housing units, that the 'E shaped' option and that option 1 is able to deliver a greater amount of affordable housing and money for the CIP than the on site option.

### Overall provision

- 6.33 The principle of the off site provision of the majority of the affordable housing is therefore considered to be acceptable. With regard to the specific floorspace policy requirements the proposal is considered acceptable for the following reasons (please note that GEA floorspace figures are normally used for this assessment, but because the units are to be pepper potted through the Tybalds Estate it is not possible to do this. In order to make a like for like comparison GIA floorspace figures have been used below):
- With the provision of 40 private units and 3,087m<sup>2</sup> of private residential floorspace on the Parker Street site the policy requirement is for 1,543m<sup>2</sup> of affordable housing floorspace on site.
  - The proposal is for 197m<sup>2</sup> of affordable housing to be provided on site and therefore the policy requirement is for 2,890 m<sup>2</sup> of affordable housing floorspace to be provided off site (3,087m<sup>2</sup> - 197m<sup>2</sup>)
  - As outlined above in paragraph 6.29 the proposal is for 2,913m<sup>2</sup> of affordable housing floorspace to be provided on the Tybalds Estate



6.34 In conclusion, given the caveats in policy DP8 which allow the requirement for funding to be spent on improvements to hostel sites elsewhere to be taken into account, along with the viability information submitted, officers consider that the policy tests have been demonstrated to justify a cascade to off site affordable housing provision. There is also some certainty that the affordable housing units can be provided at the Tybalds Estate. The amount of affordable housing and the mix of units that can be provided on the Tybalds Estate is considered acceptable and compliant with policy.

#### Standard of residential accommodation

6.35 Policy CS6 relates to a wide range of housing, including permanent self-contained housing. The general approach outlined in CS6 aims to make full use of Camden's capacity for housing. The Council encourages the creation of additional residential accommodation provided that it meets acceptable standards. All of the proposed residential units meet the minimum space standards for residential units outlined in Camden Planning Guidance (2006) and the London Plan (2011).

6.36 Policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table and this highlights the different dwelling size priorities for social rented, intermediate and market housing. The expectation is that any housing scheme will meet the priorities outlined in the table:

- For private units 1 bedroom and studio units are given a '*lower*' priority, 2 bedroom units are given a '*very high*' priority and 3 and 4+ bedroom units given '*medium*' priority.
- For social rented units 1 bedroom and studio units are given a '*lower*' priority, 2 bedroom units are given a '*medium*' priority and 3 and 4+ bedroom units given '*high*' and '*very high*' priority.
- For intermediate units 1 bedroom and studio units are given a '*medium*' priority and 2, 3 and 4+ bedroom are all given a '*high*' priority.

The expectation is also that private units will have at least 40% 2 bed units, social rented will have at least 50% large units (3 bedrooms or more) and intermediate units will have at least 10% large units. Policy DP5 acknowledges that it will not be appropriate for every development to meet the aims set out in the priorities table.

6.37 As can be seen from the table at paragraph 6.29 the proportion of 2 bed private units is 40% with 18 units provided on site. Taking the on-site provision only there is a high proportion of 2 bed social rented units (66%) and no larger units (3 bedrooms or more), taken across both sites the proportion of larger units is 54% with 14 units provided on the Tybalds Estate. There are no larger intermediate units proposed and there are a large proportion of smaller intermediate units (19 x 1 bed). The applicant has provided information in terms of affordability of units to show that, in this high residential value location, larger intermediate units become too expensive. It should also be noted that the Tybalds Estate scheme includes a number of constraints which restrict the number of larger units that can be provided. It is therefore considered that an appropriate mix of units is provided.

6.38 Camden Planning Guidance states that outdoor amenity space can be provided in the form of private garden space, balconies, terraces, roof gardens or communal amenity space. Where practical all new dwellings should have access to some private outdoor amenity space. Minimum areas for this amenity space are not given, but the space

should have level access and receive adequate daylight. The development provides balcony and terrace space for most units, with only the eight private single aspect units to the front of the building and the one bed affordable unit in Aldwych Mews not having private balconies or terraces.

- 6.39 A noise impact assessment has been submitted showing that the site is within NPPF noise exposure category C. Within this category noise should be taken into account when determining planning applications and, attenuation measures are likely to be required. The applicant is therefore proposing appropriate glazing and sound insulation to the building facades.
- 6.40 For developments that include the provision of 5 or more residential units a contribution is sought towards the provision of education infrastructure in accordance with Policy CS19 and Section 34 of Camden Planning Guidance. The CPG allows for exceptions and the Council does not seek education contributions for the affordable housing element of a scheme. For the private accommodation a contribution the contribution sought is proportionate to the size of dwellings proposed, and is not sought for single-bed units, as these are unlikely to house children. The formula in the CPG requires the provision of £2,213 per 2-bedroom units and £6,322 for 3-bedroom units, therefore a contribution of £96,732 is required towards educational infrastructure (18 x 2-bedroom units and 9 x 3-bedroom units). This will be secured as an additional condition.
- 6.41 Policy DP6 requires all new dwellings be designed to meet Lifetime Homes standards. The applicant has submitted a Lifetime Homes statement that shows the criteria have been met except that level access cannot be provided to the 2 bedroom social rented house. In this instance level access is to be provided to the rear via the courtyard to the rear of Aldwych Buildings.
- 6.42 Policy DP6 also requires 10% of the units to be fully wheelchair accessible and of this 10% social rented housing to be fully fitted out as well. Three wheelchair units are proposed all of which are private units. The proposal originally also included one of the social rented units as being a wheelchair unit but it was not possible to provide a large enough unit to accommodate the relevant wheelchair turning circles. The only way to make this unit wheelchair accessible would have been to change it to a studio unit and this was not considered acceptable. The proposal is now therefore to provide all of the social rented wheelchair units on the Tybalds estate (5 units) along with the on site provision for the private units (3 units) to meet the overall 10% requirement across both sites (86 private and affordable units across the two sites, 10% = 8.6 unit). Full dimensional plans have not been provided for the Tybalds estate and these will be required as part of the future planning application on the estate.
- 6.43 A daylight/sunlight assessment has been submitted to analyse whether the new units will receive adequate natural light in accordance with BRE recommendations. The Average Daylight Factor Test (ADF) test is not met at two of the 124 windows (2 x first floor living/kitchens to the Parker Street elevation). Given that these windows are located to the retained front façade it has not been possible to increase the window sizes in order to meet the test. With regard to sunlight a number of the lower ground, ground, and first floor windows do not meet the Annual Probable Sunlight Hours (APSH) test (5 for the winter test, 13 for the summer test and 15 for both tests). In the overall context of the scheme, given the size of the units, the number of dual aspect

units and the amount of private amenity space, it is considered that the proposed units will all receive adequate natural light and ventilation.

### Amenity impacts

#### **Daylight/sunlight**

6.44 A daylight/sunlight assessment has been provided to analyse the impact on neighbouring residential properties and it shows that the scheme would not detrimentally affect daylight and sunlight reaching habitable rooms in accordance with BRE recommendations. This study has been amended as the application has progressed with more information being submitted with regard to the impact on the school to the rear of the site. There have been objections from residents at Aldwych Buildings and from St Joseph's school with regard to impact on sunlight/daylight. The report concludes the following:

#### **Aldwych Buildings**

##### *Daylight*

- The Vertical Sky Component (VSC) test is not met at seven windows to the side elevation of Aldwych Buildings. – the test states that diffuse daylight may be adversely affected if after the development the VSC is both less than 27% and less than 0.8 times its former value. Only three of these windows are required to be tested as the other four serve bathrooms. These three windows serve kitchens and are at ground, first and second floor levels. The results show that for each of these three windows the VSC is less than 27% and less than 0.8 times its former value.
- In line with the BRE guidance the No Sky Line test would need to be carried out if the VSC test is not met. This states that daylight may be adversely affected if after the development the area of the working plane in a room which can receive direct sunlight is reduced to less than 0.8 times its former value. Of the three windows which did not meet the VSC test, the No Sky Line test is met in the first floor window.
- In line with the BRE guidance the Average Daylight Factor Test (ADF) would need to be carried out if the VSC and No Sky Line tests are not met. Of the two windows which did not meet the first two tests the ground floor window has very low existing levels of light and has an existing ADF score of 0. While this window does not meet the first two tests it is not thought that the impact on daylight would be discernable given the very low existing levels. The third floor window only marginally does not achieve the ADF score of 2% for a kitchen with a score of 1.6%.
- The two kitchens which receive less daylight than as per the BRE recommendations are within dual aspect units with rooms facing both Parker Street and the rear of the site and do not serve main living accommodation. It is therefore considered that there will not be a significant impact on the standard of accommodation to the residents in these units.

##### *Sunlight*

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at Aldwych Buildings

#### **Powis House**

##### *Daylight*

- There are no impacts in terms of VSC at Powis House.

##### *Sunlight*

- With regard to sunlight the APSH test is not met at 19 windows at Powis House– the test states that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours or less than 5% of

winter sun and receives less than 0.8 times its former value during either period and has a reduction over the whole year of greater than 4%. The results show that 6 windows will be impacted in terms of the total sunlight hours and 13 will be impacted in terms of the winter sun as they will receive less than 0.8 times their former value during each periods (at between 0 - 0.78) and have a reduction over the whole year of greater than 4% (at between 18 - 37%).

- These windows are within units which are dual aspect with rooms facing both Macklin Street and the rear of the site and do not all serve main living accommodation. It is therefore considered that there will not be a significant impact on the standard of accommodation to the residents in these units.

### **St Joseph's School.**

#### *Daylight*

- Additional information has been submitted during the course of the application to assess the impact on the school to the rear of the site. Where BRE Guidelines are applied to school buildings their application is usually limited to classrooms or rooms which are used for study purposes such as libraries. There are no impacts in terms of the VSC test. With regard to the No Sky Line test five rooms do not meet these tests – one serves the first floor nursery and achieves a very poor ADF result (4.79%) and four serve kitchens or offices.

#### *Sunlight*

- All of the classrooms and the school hall meet the APSH test. There are nine windows which do not meet this test - one window in the first floor nursery, the ground floor stairwell, first floor kitchen, first floor office, second floor office and second floor hall.

#### *Playground*

- The impact on the school playground to the north of the application has been tested to see if at least 50% of the area receives at least two hours of sunlight on 21 March. The results show that 67% of the area would receive at least two hours of sunlight. The BRE guidance states that the 'two hours sun contour' should be marked on a plan to assess whether the use of specific parts of the site can be planned with sunlight in mind and this plan shows that the main bulk of the playground will meet this test. The shaded areas are located in the north eastern corner and to the south of the playground

### **34-38 Parker Street**

- There are no impacts in terms of daylight or sunlight at 34-38 Parker Street

### **Overlooking**

6.45 In terms of privacy there are not considered to be any significant issues for the following reasons:

- There are existing residential windows to the rear elevation of Aldwych Buildings. The exact layout of the flats is unknown, but of the fourteen ground floor windows, eight appear to serve habitable rooms. There are also three stairwells providing the only access to the units, via the rear courtyard. There are currently therefore existing levels of overlooking with residents having to walk past the existing windows to access their flats. The two proposed residential units in Aldwych Workshops would be single aspect with their only windows facing the rear elevation of Aldwych Buildings, at a distance of 8.5m. Although this is relatively close it is considered that there will be no unacceptable overlooking impact on the existing residents for the following reasons:
  - The proposal includes central courtyard planting beds, storage areas and

cycle storage boxes which will block views from most of the proposed windows without impacting on sunlight/daylight levels.

- A condition is recommended requiring the one of the ground floor hallway windows, the panels adj to the entrance doors and a first floor hallway window to be obscure glazed.
- There would only be two first floor windows to the 2 bed unit where overlooking could occur, serving a kitchen and living room.
- There are existing residential windows to the side elevation of Aldwych Buildings which serve bathrooms and kitchens. There are already a number of hostel room windows to the side elevation of the application site facing these windows. The proposed side elevation is a similar distance with a similar number of windows. Given the close proximity of the existing buildings and the number of existing hostel room windows it is considered that there will not be any unacceptable levels of overlooking or a need for any obscure glazing.
- To the rear of the site the new building line is in a similar position to existing, albeit with two wings in a different location to the existing three wings. There will be a distance of between 13m and 21m between the proposed residential units and the existing residential units at Powis House. Given the existing number of hostel room windows to the rear elevation and the fact that the buildings are at a different angle it is considered that there will not be any unacceptable levels of overlooking.
- Whilst the distances from the school at the rear of the site are between 9m and 14m for similar reasons it is considered that there will not be any unacceptable levels of overlooking.
- There are existing residential windows to the rear at 10-14 Macklin Street which are at right angles to the rear boundary of the site and are all obscure glazed at upper floor levels. Whilst there will be new residential windows closer to these existing windows there will not be any overlooking issues because they are all obscure glazed.
- The distance from the properties on the opposite side of Parker Street (13m) will not change with the proposed scheme and there are already hostel rooms windows to the front façade. There will not be any changes to the existing situation on Parker Street and it is therefore considered that there will not be a significant overlooking impact for the existing residents on Parker Street.
- There are existing commercial windows located approximately 7-8m away from the side elevation of the building at 39-41 Parker Street. The proposed side elevation is a similar distance, with a similar number of windows. Given the commercial nature of the existing windows, the close proximity of the existing buildings and the number of existing windows it is considered that there will not be any unacceptable levels of overlooking.

### **Other issues**

- 6.46 **Plant noise** – There is no mechanical plant proposed on the roof top or external areas of the development. Plant rooms are provided in the basement for water tanks, electricity meters, CHP boilers, and heat recovery systems and there is not thought to be any noise emanating from these. Concern has been raised by Aldwych House residents regarding noise, pollution and health impacts from the proposed sub station in Aldwych workshops. In order to protect residents, the standard noise conditions have been recommended to ensure that the levels specified are achieved and if not that necessary steps are taken to ensure they are.

- 6.47 **Balconies on new side elevation** – Concern has been raised by Aldwych House residents regarding potential noise and disturbance from the new terraces and balconies in the scheme. To the side elevation one balcony is proposed at second and third floor level, along with terraces at fourth and fifth floor level. These balconies and terraces would be at a higher level than the existing courtyard and are relatively small (with the balconies projecting 1m and the terraces being 3m in depth at their largest). It is therefore considered that they are not expected to cause any overlooking or noise/disturbance problems.
- 6.48 **Construction impact** – Concern has been raised by local residents and St Joseph’s School regarding the impact of the construction works, in particular the construction/demolition noise impact. The applicant has submitted additional information as the application has progressed with a Demolition and construction Noise Assessment, Site Waste Management Plan and Outline Demolition Method Statement (as well as the draft CMP discussed in paragraph 6.51). As part of this work an additional noise survey was undertaken to measure noise in the playground and classrooms. The demolition and site clearance noise levels have been predicted to the classrooms and the report concludes that with mitigation measures (‘Envirowrap’ polyethylene sheeting and temporary barriers) an increase in noise levels of less than 3dB is predicted, which is considered to be not perceptible to the average person. A condition is recommended requiring compliance with these reports and the use of the mitigation measures.

#### Transport

- 6.49 The site has a PTAL score of 6b, the highest achievable, which indicates that it has an excellent level of accessibility by public transport. The nearest station is Holborn, located to the north east of the site, whilst Covent Garden station is located to the southwest. There are a large number of local bus routes and the nearest bus stops are located on Kingsway and High Holborn.
- 6.50 The site is located within Controlled Parking Zone CA-C, which operates between 8.30am and 6.30pm Monday to Saturday. No off-street parking is currently provided and none is proposed. The nearest on-street parking bays are located to directly outside the site on Parker Street. Policy DP18 seeks to ensure that development provides the minimum necessary car parking provision. It expects developments in highly accessible locations such to be car-free. No car parking is being provided and a Car Free agreement is recommended to be secured with a condition to ensure that residents are unable to obtain on-street permits from the Council.
- 6.51 Given the scale of development proposed, the Central London location and the proximity of neighbouring properties, a Construction Management Plan will be necessary for this development. This is recommended to be secured by condition. A draft document has been submitted with the application and this states that the demolition works are likely to take 9 months; that a Resident Liaison Officer will be employed; that once the building is demolished the construction compound will be located in the new basement; that the working hours will comply with the Control of Pollution Act, that the construction lorry routes will be via Kingsway, Great Queen Street, Newton Street and Parker Street; and that there will be a peak of 30 construction vehicles per day.

- 6.52 A Transport Statement has been submitted by the applicant and this indicates that there will be an increase in trips generated by the proposed residential units of 149 trips per day. It is anticipated that this will mainly be walking trips (72), cycle trips (32) and bus trips (26). Given the increase in pedestrian and cycle trips, and in order to tie the development into the surrounding urban environment, a financial contribution is required to carry out various highway and public realm works surrounding the site. This is recommended to be secured by condition.
- 6.53 The site is currently serviced on-street from Parker Street using the existing parking bays or the loading bay which is located further west of the site and this will continue to in the future. A communal refuse storage area is provided within the basement, accessible to the residents by lifts and stairs. The refuse is to be removed by the concierge team via a separate scissor lift which can be accessed directly from the street separate. A separate refuse area is also proposed within Aldwych workshops, in an enlarged area in a similar location to existing and this will be collected as existing with the refuse vehicles accessing the courtyard area. It is considered that a Servicing Management Plan will be unnecessary for this development.
- 6.54 Policy DP17 and the London Plan require development to sufficiently provide for the needs of cyclists, which includes cycle parking and states development must comply with Camden Parking standards which states that one storage or parking space is required per residential unit, however for larger residential units (3+ beds) two spaces are required. The proposal is for 43 residential units with 5 larger units; therefore a minimum of 48 cycle storage/parking spaces are required. The applicant has included a cycle storage/parking area in the proposed basement accessed by a larger lift to house 75 cycle spaces. Ten cycle storage units are also proposed in the courtyard to the rear of Aldwych Buildings (for use by existing residents and the additional units in Aldwych Buildings). The provision of these cycle parking spaces is recommended to be secured by condition.

#### Other issues

- 6.55 **Basement** - Because the site is within an area where ground water flooding and slope stability and the proposal involves basement excavation of approximately half of the plot area (approximately 3.3m deep) to create a new basement level, the applicant has submitted a basement impact assessment in line with policy DP23 and DP27. The conclusion of the screening part of the report is that the site is located over Lynch Hill Gravel which is classified as forming part of a Secondary Aquifer; that construction works are proposed within 5m of a highway; and the basement will increase the differential depth of foundations relative to neighbouring properties. The Report then goes on to provide more information with respect to these points and concludes that dewatering is not anticipated to be required; and that the proposed construction method (bored contiguous piling) is suitable for the site and surrounding properties. It is considered that the scheme complies with policies DP27 and DP23.
- 6.56 **Open space/biodiversity/trees** - There are seven street trees located on Parker Street and the applicant has submitted an Arboricultural statement to assess the impact on these trees. The report concludes that there will be no impact on these trees from the demolition or construction works.
- 6.57 Policy CS15 seeks to ensure that new development conserves and enhances wildlife

habitats by greening the environment. A green roof is proposed to the main building and a condition is recommended requiring the submission of further details and its provision.

- 6.58 The applicant have submitted an ecological report which recommends that various measures are taken to increase biodiversity on the site including installing bird and bat boxes on the buildings. A condition is recommended to ensure compliance with this ecological report in order to secure these measures.
- 6.59 CPG guidance requires the provision of 9 sq m of open space per person for residential developments providing 5 or more additional dwellings. Open Space provision will initially be expected to be provided on site. Where a site cannot provide open space provision on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. If either of the above are not practical a financial contribution to open space will be acceptable. The contribution expected for this development would be £58,371 and this will be secured with a condition.
- 6.60 **Sustainable design and construction** - The overall approach to energy should be in line with the Mayor's Energy Hierarchy i) using less energy; ii) supplying energy efficiently; iii) using renewable energy. With regard to the third element of the hierarchy there is a requirement for a 20% reduction in CO<sub>2</sub> through the use of on-site renewable technologies.
- 6.61 The energy strategy shows how the new building achieves the first two elements of the hierarchy by using less energy and supplying energy efficiently. The proposal is to include a CHP unit and following the completion of the works, in terms of CO<sub>2</sub> usage, there will be a saving of 0.03 Tonnes CO<sub>2</sub> per annum, which will reduce the energy requirement of the building by around 30% compared to the baseline of a Building Regulation compliant building.
- 6.62 In line with policy the applicants have submitted a Code for Sustainable Homes pre assessment that shows the site can achieve a 'level 4' rating. The CPG states that developments should achieve 50% of the available credits in each of the energy, water sections and materials and resources sections. The pre assessment shows that 54% is expected in the energy section, 67% is expected in the water section and 66% expected in the materials and resources section.
- 6.63 With regard to the third element of the hierarchy the applicant proposes the use of renewable energy in order to provide 5% of the predicted energy requirements. Specifically they propose the use of roof top PV cells to achieve a 23.1% reduction in CO<sub>2</sub>. The applicants have explored the use of renewable energy across the whole site, and it has only been possible to provide 55sqm of PV panels to the new roof of the building to the rear. It has not been possible to include enough renewable energy technology to achieve the 20% target because:
- There is insufficient land area for horizontal ground source heat pump and vertical coils may disturb the existing façade which is to be retained;
  - The site is unsuitable for a wind turbine; and
  - There is limited roof space available for any more photovoltaic panels or for any solar hot water panels, which are not overshadowed by other buildings;



It is recommended that the recommendations of the energy report are secured through a condition.

- 6.64 **Archaeology** - The site is situated in the London Suburbs Archaeological Priority area, and is in an area where prehistoric, Roman, Saxon, medieval and post-medieval remains have been found below present foundation levels. The applicant has submitted an Archaeological desk based assessment which concludes that development proposals, which include a new basement level, are likely to have an archaeological impact and that further archaeological works will be required at the site. In accordance with the recommendations given in PPS 5, Policy HE 6.1 – 6.3 and 12.3, and in Camden LDF Policies CS14 and DP25, a record should be made of the heritage assets prior to development, in order to preserve and enhance understanding of the assets. A condition is therefore recommended to secure a programme of archaeological mitigation in accordance with a written scheme of investigation.
- 6.65 **Local Employment and Local Procurement** - The proposed development at 4,419sqm has the potential to generate significant local economic benefits. Policy CS19 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure by legal agreement employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.
- 6.66 The applicant has agreed to link into the local employment and training initiatives and opportunities for local businesses during the construction period and one construction industry apprenticeship. Subject to the compliance with conditions to secure the above measures, the proposed development will assist in the creation of local employment and business opportunities reinforcing neighbourhood renewal objectives and improving the sustainability of the local economy.

#### **Community Infrastructure Levy (CIL)**

- 6.67 The proposal will be liable for the Mayor of London's CIL as the additional floorspace exceeds 100sqm or one unit of residential accommodation. Based on the Mayor's CIL charging schedule and the information given on the plans, the charge is likely to be £153,300 (£50 x 3,066sqm new residential floorspace). This will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative would have been attached to any consent advising the applicant of this charge if the application were to be approved.

## **7. CONCLUSION**

- 7.1 The loss of the hostel use at this site, along with the refurbishment and extensions at Mount Pleasant Hostel and Holmes Road, is considered to be in accordance with policies CS6, DP4 and DP8. The substantial harm from the demolition of the buildings it is considered to be outweighed by the substantial public benefits created by the scheme in terms of affordable housing provision and CIP contribution. The new build elements and amendments to the retained façade are considered to satisfactorily respond to the character and appearance of the retained front façade and the collection of later 19th Century blocks and warehouses which surround the site.

- 7.2 Taking into consideration the requirement for funding to be spent on improvements to hostel sites elsewhere, along with the viability information submitted, officers consider that the policy tests have been demonstrated to justify a cascade to off-site affordable housing provision. There is also some certainty that the affordable housing units can be provided at the Tybalds Estate. The amount of affordable housing and the mix of units that can be provided on the Tybalds Estate is considered acceptable and compliant with policy.
- 7.3 There are no detrimental impacts from the proposed scheme on surrounding residential properties in terms of overlooking, overshadowing, plant noise, noise and disturbance.
- 7.4 Planning permission is recommended subject to conditions. A final condition will be added to explain that in the event of the Council disposing of its interest in the land prior to implementation and/or occupation of the scheme, certain conditions become heads of terms in a new S.106 legal agreement. These heads of terms will include the following (as covered by conditions 23-35;
- Replacement hostel accommodation at Holmes Road and Mount Pleasant hostels
  - Provision of affordable housing (3 units on site, 2,913m<sup>2</sup> of 'off site' at Tybalds Estate)
  - Car free development
  - Construction Management plan
  - Local labour and procurement
  - One construction industry apprenticeship
  - £58,371 open space financial contribution (using CPG calculation)
  - £96,732 education financial contribution (using CPG calculation)
  - £40,349.13 financial contribution for highway works
  - Full Code for Sustainable Homes assessment and post construction review
  - Compliance with the energy statement and sustainability statement
  - £153,300 Crossrail contribution (£50 x 3,066sqm)

## 8. **LEGAL COMMENTS**

- 8.1 Members are referred to the note from the Legal Division at the start of the Agenda.