

December 2014

Planning Statement

England's Lane Residences, London NW3 4XY

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1. Introduction

- 1.1 This statement has been prepared in support of a planning application at England's Lane Residences, England's Lane, London NW3 4XY. The proposals involve:
- *Construction of full height rear extension to the eastern half of the building, within the 'cloister' formed by two projecting wings to the building*
 - *Change of use of the eastern 'wing' of building into residential use, providing 9 self-contained flats*
 - *Re-provision of hostel rooms within new extension at the rear*
- 1.2 This application follows pre-application enquiries undertaken with Camden Council in March 2014 and May 2013. The Council's written responses was received by email and forms **appendix 1** of this document.
- 1.3 It is considered that this application submission addresses all issues raised within the pre-application enquiries, as set out within Section 5.
- 1.4 The report has been prepared following an examination of the site and surroundings, research into the planning history of the property, and an examination of relevant policy documents.
- 1.5 This statement provides the background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, and is set out under the following sections:
- **Section 2** outlines the site and its context within the surrounding area
 - **Section 3** provides an overview of the planning history
 - **Section 4** provides an outline of the proposals
 - **Section 5** examines the main planning considerations
 - **Section 6** draws our conclusions in respect of the proposals

2. Site and Surroundings

- 2.1 England's Lane Residence is a large 1930s brick building originally built as a block of flats, but is now in use as a hostel. It is a four storey property, and features additional accommodation at mansard roof level and at basement level.
- 2.2 The building is not listed but lies within the Belsize Park Conservation Area. It is described as being a positive contributor to the area by the Conservation Area Statement.



England's Lane Residences, viewed looking north

- 2.3 The site fronts England's Lane, on the corner of its junction with Haverstock Hill. A further elevation to the site is located at the junction of England's Lane and Antrim Road.
- 2.4 Pedestrian access is from England's Lane, and a vehicle access point to the rear of the site is located on Antrim Road.
- 2.5 Camden Council's Temporary Accommodation Group is the current operator of the premises. The council manages the site specifically for homeless people.
- 2.6 The current hostel comprises 162 rooms, all self-contained with an internal kitchenette and bathroom.
- 2.7 Rooms are fully furnished, though guests staying for the longer-term may bring their own furniture or possessions if so desired.

- 2.8 A staffed reception area is located at the main entrance to the building, and a staff room/office is located at ground floor level nearby.
- 2.9 Communal facilities within the building are primarily focused on families and children, and includes a dedicated suite hosting mother and baby classes, a computer room, crèche etc.
- 2.10 Rubbish chutes are located on each wing of each floor.
- 2.11 The application site is a short walk from the London Underground stations of Chalk Farm and Belsize Park, located approximately equidistant between the two. Bus routes operate along Haverstock Hill towards Camden Town and Hampstead, and along England's Lane towards Swiss Cottage.
- 2.12 Primrose Hill is within walking distance south of the site, and Parliament Hill to the north.



View of England's Lane Residences from the junction of England's Lane and Haverstock Hill



View from England's Lane, looking north



View from Haverstock Hill, looking south

3. Relevant Planning History

3.1. Of principal relevance to this pre-application enquiry is a planning application which was refused on 30th May 2012 (ref. 2012/0916/P) which proposed to erect a new wing to the rear of the building, replace the existing roof storey with a new brick sheer storey, and the erection of a new mansard roof level all in connection with providing an additional 35 hostel rooms. It was also proposed to refurbish 15 existing hostel rooms at the fourth floor of the property, and provide covered bicycle parking.

3.2. Also of relevance is a Lawful Development Certificate granted on 25 February 2004 (ref. 2004/0858/P) for the use of the building as a hostel (Sui Generis Use).

Pre-application enquiries

3.3. A pre-application enquiry with the Council was concluded in September 2013 (ref. 2013/2494/PRE).

Pre-application enquiry - 2014

3.4. A follow-up pre-application enquiry with the Council was concluded in July 2014 (ref. 2014/2610/PRE) which responded to comments within the first pre-application enquiry and sought further clarification from the Council. This follow-up pre-application enquiry forms the basis of this planning application.

3.5. A full discussion on the nature of the Council's comments is included in Chapter 5 of this document, and how this current scheme responds to each point raised by Camden, either through a revision to the scheme or through the supply of additional information.

4. Proposals

- 4.1. England's Lane Residences features three 'wings' which project rearwards, which form two courtyards at the rear of the building in between each of these 'wings'.
- 4.2. It is proposed to extend the property at the rear, within the eastern courtyard area. The extension is to the 'main' building, and will push out the rear building line into the courtyard.
- 4.3. The additional floorspace being created allows the change the use of the eastern 'wing' of the building into residential use to provide 9 self-contained flats.
- 4.4. The hostel rooms within this wing which are to be lost as a result of this change of use will be reprovided within the new extensions to building at the rear and at roof level.
- 4.5. A full set of plans indicating the phasing and sequencing of development accompanies this planning application, demonstrating how the impact of the development on the continued operation of the hostel will be minimised.
- 4.6. A separate, dedicated residential entrance is to be created on the Haverstock Hill elevation of the building. It will be accessed directly via a new pedestrian gate from Haverstock Hill.
- 4.7. New bicycle storage facilities are to be provided within the communal garden area associated with the residential units, fronting Haverstock Hill.
- 4.8. A separate dedicated refuse store and recycling facility is located at ground floor level within the residential 'wing'.

5. Planning Considerations

- 5.1. The 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. In this case the development plan comprises the London Plan, the Camden Core Strategy and the Camden Development Policies Document. Also of relevance is the National Planning Policy Framework, and the Belsize Conservation Area.
- 5.3. The following section sets out the considerations of the proposed development in relation to relevant planning policy and guidance - and specifically with reference to the Council's pre-application response - under the following headings:
- Principle of Development
 - Land Use
 - Existing hostel use
 - Provision of residential accommodation
 - Design
 - Rear extension
 - External alterations
 - Amenity
 - Transport and servicing
 - Trees and landscaping
 - Planning application requirements

Principle of Development

- 5.4. The broad principle of the development involves the change of use of the eastern 'wing' of the existing building from a hostel to residential use, and re-providing the replacement hostel accommodation within a new rear extension to the main building. This principle is considered acceptable in relation to the Council's policies: this was confirmed on the pre-application advice from officers.
- 5.5. This report now discusses the individual material planning considerations arising as a result of the proposals, and discusses the points raised by Council's formal pre-application response.

Land Use

(i) Existing hostel use

- 5.6. The entire site is currently occupied as a hostel, operated by Camden Council's Temporary Accommodation Group. The site is managed by the Council specifically for homeless families. The hostel comprises 162 self-contained rooms.
- 5.7. Policy DP8 of Camden's Development Policies Document concerns "accommodation for homeless people and vulnerable people", and it explicitly seeks to protect hostels for the homeless. The supporting text states at paragraph 8.12:

"Traditionally, hostels have formed a significant proportion of the accommodation available to homeless people and some vulnerable groups. However, hostels are also provided for a diverse range of groups without support needs, such as students and backpackers. Hostels do not fall into a planning use class, so any material change to the use (including a change to the type of occupier) is classed as development"

- 5.8. The existing broadly defined 'Sui Generis' hostel use is afforded protection by Policy DP8. In this regard, the proposals for the site – discussed in greater detail below in the various subsections – have been developed around retaining the existing hostel use.
- 5.9. The eastern 'wing' of the building – the section fronting Haverstock Hill - will be converted into residential use.
- 5.10. Replacement hostel accommodation – rooms and floorspace - is provided within a new rear extension to the building.
- 5.11. In broad land use terms, there will be no reduction in the number of hostel rooms provided by England's Lane Residences. The 'person capacity' of the hostel will be retained.
- 5.12. In refusing the previous application, the officer's report states:

"The current planning application is for extensions to the existing building to accommodate a further 35 units. The proposal would therefore result in an intensification of the use of the site. The applicant submitted a Design and Access Statement in support of the application. However, nowhere in the applicant's supporting statements has it been indicated that there is a specific requirement or need to extend the hostel to provide additional bed spaces."

- 5.13. This application is therefore a significant revision on the application previously considered by Camden, and refused in May 2012. It is no longer proposed to increase the number of hostel rooms, but instead retain the level of provision at 162 rooms.
- 5.14. There is therefore no intensification of the existing use, and as a result the proposal is in accordance with Policy DP8.
- 5.15. These points were considered by the Council in their 2014 pre-application response, which states:

“The loss of hostel accommodation for homeless people is generally resisted under policy DP8 of Camden Development Policies 2010, however replacement by adequate accommodation that meets the DP8 criteria is acceptable... In this instance the rooms lost would be re-provided. There would be no reduction in the number of hostel rooms which is accepted to be in line with policy”

- 5.16. In relation to the need for hostel rooms for homeless people, the 2014 pre-application response goes on to state that “at present, the Council is reviewing their future needs”. It is our understanding, from discussions with Bonny Stevens, that the Council’s research may prove that there is in fact an over-supply of hostel accommodation for homeless people. However, as this research has not been completed or published yet, our application continues to propose the replacement of all of the hostel rooms, in line with current planning policy.
- 5.17. All of the replacement hostel rooms have been designed to replicate the nature of the existing hostel accommodation within the building. Rooms accord with lifetime home standards - indeed many are larger than the rooms they are replacing - having access to facilities such as private kitchens and bathrooms. The replacement rooms have been designed to replicate the nature of the wider hostel use, utilising the building’s existing facilities such as a porter/concierge, internal lifts, and existing servicing arrangements.
- 5.18. Accompanying this planning application are a series of drawings which show the phasing of the development proposals. They have been developed to minimise the impact of the development on the continued operation and occupancy of the hostel use, and each phase - phase 1, phase 2, and phase 3 - is clearly annotated on the drawings.
- 5.19. This phasing has been designed to ensure minimum disruption and to seek to keep the maximum number of existing hostel rooms in operation at any given time. Whilst phase 1 is in construction - constructing the rear extension and new hostel rooms within this rear extension - a total of 30 hostel rooms (out of a total of 162) will have to be accommodated elsewhere.
- 5.20. Whilst phase 2 is under way - reconfiguring the hostel rooms at the front of the building to accommodate additional units - this reduces to a total of 16 rooms.
- 5.21. Phase 3 is the development of the residential accommodation in the eastern wing, once the hostel rooms have been successfully re-provided elsewhere on the site. There will be no loss of hostel rooms in Phase 3.
- 5.22. As requested in the pre-application response, we have liaised directly with Bonny Stevens in the Temporary Accommodation Group and we will be working closely with the Council in order to ensure that the hostel rooms are re-provided, where necessary, during the various phases of construction.
- 5.23. The 2013 pre-application feedback requested that an application be accompanied by a hostel management plan. However it was agreed within the 2014 pre-application discussions that this would not be a requirement of the planning application, as the hostel rooms already exist and are simply being relocated. As such the management of the hostel will be as per the existing situation.

(ii) Provision of residential accommodation

- 5.24. By replacing the hostel accommodation elsewhere, there is opportunity to provide a number of residential units within the building.
- 5.25. The existing hostel use is a long-term established land use within the local community and has, to our knowledge, been operating without complaints or adverse amenity issues. It is a 'residential hostel' embedded in a predominantly residential area.
- 5.26. It is therefore in our view reasonable to consider the site as capable of accommodating a mix of hostel use and permanent residential accommodation without any adverse amenity issues.
- 5.27. Additional residential accommodation is supported by development plan policy, the London Plan, and the National Planning Policy Framework. Indeed, a more efficient use of land – providing new residential units whilst maintaining the existing use on the site – is one of the core principles of the NPPF, and constitutes the 'golden thread' of sustainable development.
- 5.28. A mix of unit sizes has been provided, in accordance with Policy DP5. A total of 9 units are proposed, featuring 1-bed units, 2-bed units, and 3-bed units all of varying sizes (and person capacity).
- 5.29. The unit mix was revised following the first pre-application feedback in 2013. Previously a studio unit was proposed at ground floor level, and an emphasis placed on 2-bed units. Whilst Policy DP5 places a "very high priority" on 2-bedroomed units, the 2013 pre-application response stated:

"The London Plan 2011 and Camden Development Policies 2010 class large homes as homes with 3-or-more bedrooms. The proposed C3 accommodation would provide only one large home of the nine proposed. Development Policy DP5 seeks a mix of large and small homes in all developments. In accordance with DP5, you are strongly encouraged to provide at least two large units."

- 5.30. Accordingly, the third floor has been reconfigured and an additional "large unit" is now proposed, bringing the total to 2, responding to this point raised by the Council. The majority of units (5 of 9) remain as 2-bedroom units, in accordance with the priority placed on them by Camden. This was found to be acceptable within the 2014 pre-application feedback.

Apt. no.	Floor	Bedrooms	Persons	Area (GIA)
1	Gnd	1	2	52sqm
2	Gnd	1	2	62.6sqm
3	1st	2	3	71.1sqm
4	1st	2	4	78.1sqm
5	2nd	2	4	75.3sqm
6	2nd	2	4	76.5sqm
7	3rd	2	3	61.6sqm
8	3rd	3	5	90.4sqm
9	4th	3	6	133.7sqm

- 5.31. The pre-application response continued, in respect of cycle parking:

“You will also need to show how you suitably accommodate covered and secure bicycle storage and refuse storage without detriment to amenity and character/appearance.”

- 5.32. Due to Code for Sustainable Homes requirements, a total of 89 cycle spaces are needed in order to meet the required standard. The proposed ground floor plan shows where the cycle spaces will be housed, and the apportionment of the spaces to both the hostel and residential uses (78 for the hostel, 11 for the private residential).
- 5.33. A small bin store is proposed within the communal landscaped garden area against the boundary fence at the front of the residential block fronting Haverstock Hill. It is not considered that a modest, well positioned and appropriately designed bin store - comprising a simple wooden fence - will result in a detrimental impact to character and amenity.
- 5.34. Accompanying this application are a series of proposed floorplans which show the dimensions of each individual room within each individual unit, demonstrating their compliance with Lifetime Homes standards and the Mayor of London’s standards for unit sizes. The 2014 pre-application response states:

“The new residential accommodation as well as replacement hostel rooms would need to conform to Lifetime Homes Standards.”

- 5.35. However, the case officer (Olivier Nelson) confirmed via email on 21st July 2014 that in fact just the residential element of the scheme needs to be assessed against Lifetime Homes Standards, whilst the hostel element will need to meet building regulation requirements. As such, the accompanying Design and Access Statement sets out on page 19 where Lifetime Homes Standards have been achieved for the residential element of the scheme.
- 5.36. Finally, to revisit a point previously considered by the Council, there will be no requirement to provide affordable housing as 941sqm (or 9 units) of residential floorspace is proposed within the retained building. The 2014 pre-application feedback confirms that “As proposed no affordable housing would be required”.

Design

- 5.37. The property is not listed, but is located within the Belsize Park Conservation Area. The building is identified within this Conservation Area Statement as making a positive contribution to the conservation area.
- 5.38. The proposal is, for the most part, a conversion scheme. The proposal utilises the existing shell of the building, but a rear extension is proposed within the eastern ‘cloister’.
- 5.39. A separate, dedicated entrance is proposed on the Haverstock Hill elevation for sole use by the new residential units.

5.40. When viewed from England's Lane itself the building is broken into two blocks as a result of a physical step back in the building line. The external alterations to the building are confined to the eastern half of the building, and the drawings reflect this. The Council's previous pre-application response states:

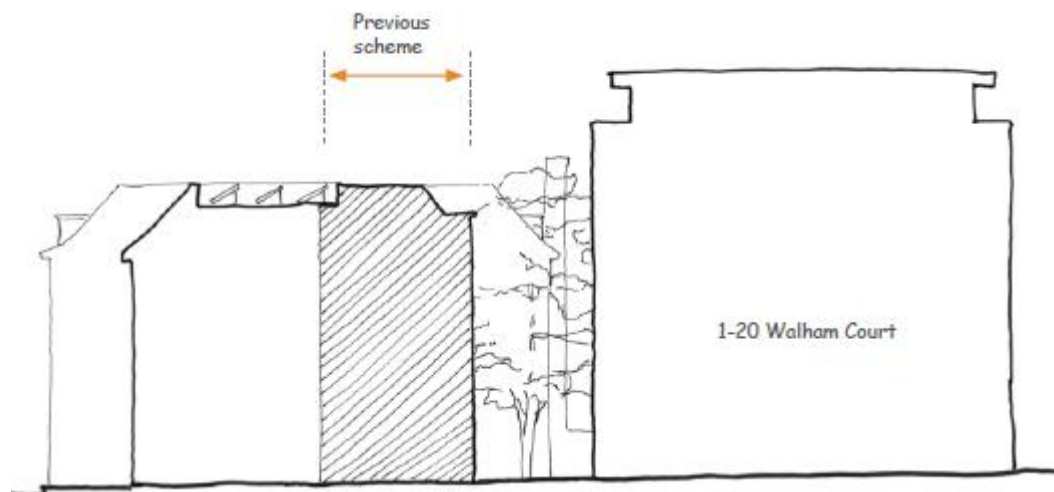
"In addition to the rear extension, particular attention should be paid in any application to detailing the changes to the façade for the C3 flats as well as any stand alone structures that may be introduced for bicycle parking and refuse storage for example. Any modifications need to be consistent and appropriate to the character and appearance of the host building and street scene."

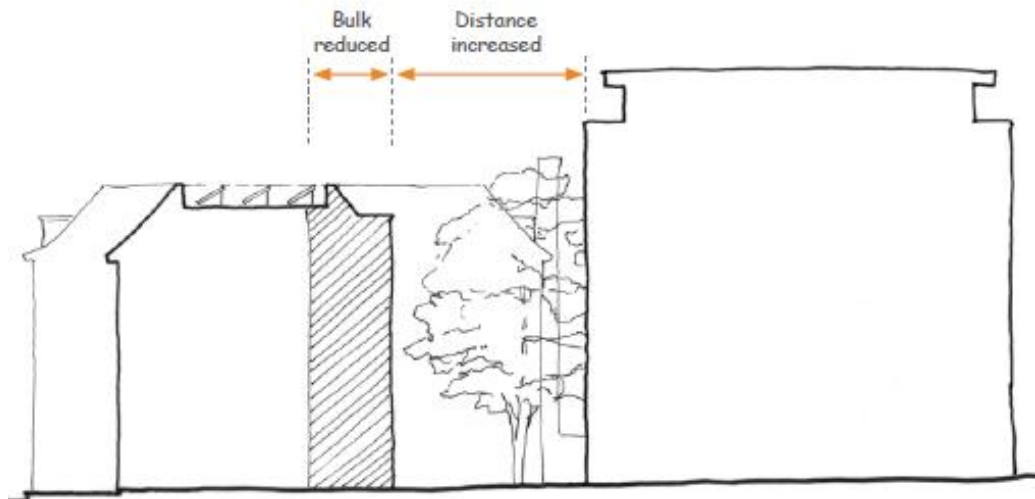
5.41. As set out above, the external alterations to the building are focused on the rear elevation of the eastern half of the building - the new rear extension - and the front elevation of the eastern elevation fronting Haverstock Hill, where a new residential entrance is to be created. Features such as bicycle stores, bin stores, and black metal railings are already present across the site and utilising these materials and designs in respect of the new residential units will not detract from the existing character of the site.

(i) Rear extension

5.42. The previously refused scheme proposed a new rearward projecting wing within the eastern 'cloister' at the rear. This rear projection resulted in built form being extended towards Walham Court to the north – a 7 storey residential block – and an existing tree within the demise of Walham Court.

5.43. The current scheme is to 'push out' the rear building line in a conventional and consistent manner, providing a straight rear elevation in keeping with the existing.





- 5.44. The result is that whilst a rear extension is proposed, the maximum extent of the rearward projection is reduced by approximately 3.5m in contrast to that which was previously refused, achieved via the omission of a 'wing' design to the extension. By setting back the rear building line 3.5m from that which was previously proposed (and refused), the outlook and sense of enclosure attributed to both the new hostel rooms in this location and to the residential properties at Walham Court is improved.
- 5.45. The 2014 pre-application feedback confirms that, in respect of design, "The proposals are considered acceptable in principle".
- 5.46. With regards to the nearby Plane tree, the extent of the rear extension has been previously discussed with Alex Hutson of the London Borough of Camden's arboricultural team and was considered acceptable. The accompanying arboricultural report prepared by Landmark Trees sets out how "the potential impacts of the proposals are very low" and, in terms of the rear extension, represents a very modest 6% encroachment into the plane tree's root protection area. The proposed extension is therefore considered acceptable.
- 5.47. The rear extension is full height at 5 storeys (including the mansard roof) and replicates the existing external appearance of the building in terms of proportions, fenestration, rhythm, detailed design and materials.
- 5.48. In design terms, the extent of the rear elevation was considered acceptable by the Council at both stages of pre-application. The potential impact of the new extension on nearby residential amenity is discussed later in this document.

(ii) Haverstock Hill elevation

- 5.49. A separate, dedicated entrance to the new residential units is proposed within the eastern elevation of the building, fronting Haverstock Hill.
- 5.50. The new entrance has been designed to replicate the location, appearance, proportions and detailed design as that which is found at the opposite end of the building, fronting Antrim Road.



Antrim Road elevation to the Residences



Proposed Haverstock Hill elevation to the Residences, to match the Antrim Road elevation

5.51. These alterations to the elevation of the building are sympathetic to the host building and in keeping with the character and appearance of this building identified as a positive contributor to the conservation area.

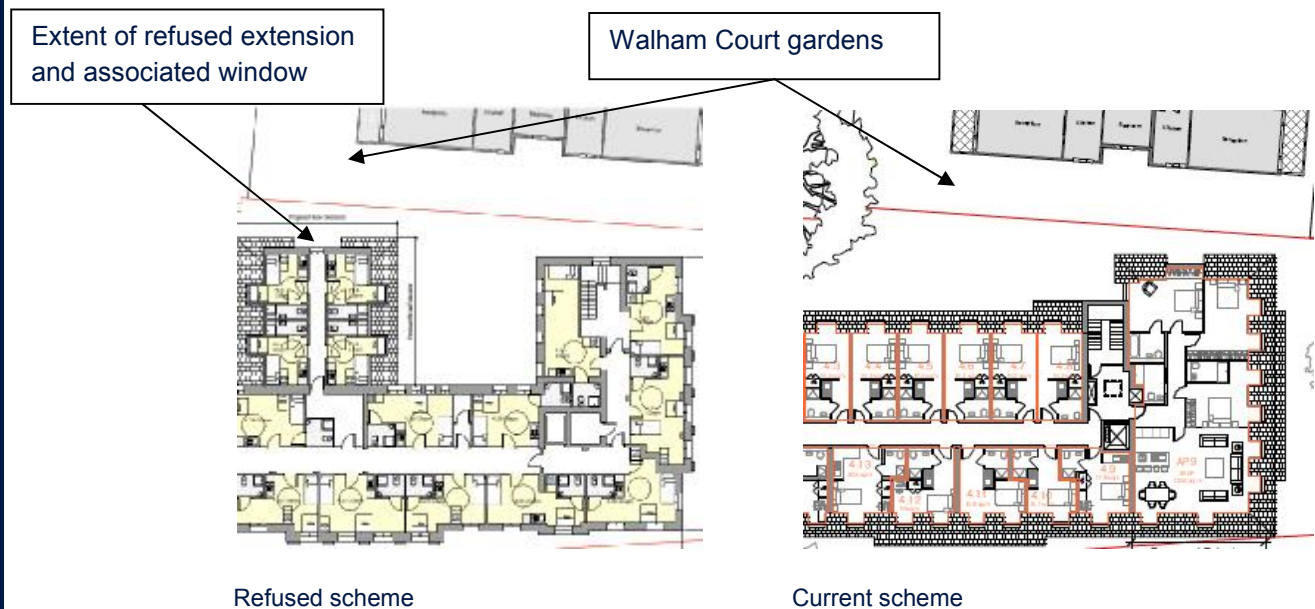
(iii) England's Lane elevation

5.52. Previously, a secondary entrance was proposed on the England's Lane elevation of the eastern wing. This has now been omitted from the scheme following discussions at the previous pre-application enquiry.

5.53. This elevation remains as existing.

Amenity

- 5.54. An acceptable level of amenity is achieved within the new residential units, and the new hostel units. The accommodation will have a suitable outlook - similar to the existing situation given how the existing building is retained - and the new residential accommodation will meet lifetime homes standards as discussed above.
- 5.55. England's Lane Residences is located within relatively close proximity to Walham Court to the north. Due to the size and proximity of the existing Residences, it is not considered that the proposal represents any worsening of existing residential amenity in respect of outlook, privacy, sense of enclosure, sunlight or daylight.
- 5.56. The 2014 pre-application response discusses this, and states:
- "The privacy distance floor plans submitted show the distances from the boundary to the properties on Walham Court. The existing distances range from 1.8m to 2.2m for the rooms which are to be converted to residential. The extension to the hostel rooms would result in a privacy distance range between 5m to 6.95m which is significantly less than the minimum separation distance of 18m particularly at the upper levels. Given the above, the proposal is still considered unacceptable given the impact on overlooking and sense of enclosure."*
- 5.57. Further discussions were held with the case officer following the pre-application feedback. Specifically, we would highlight that in terms of the upper floors of the proposed elevation facing Walham Court, only one window on each floor is proposed on the side elevation of the extension (the corner living areas), and these windows are obscure glazed. The next windows along are at least 11 metres away from Walham Court, and in any case Walham Court does not have windows at this point in its elevation.
- 5.58. As such, there is no part of the proposed elevation which features windows which look onto a window at Walham Court, as such there is no potential for impact on privacy on Walham Court.
- 5.59. In terms of overlooking to the gardens of Walham Court, we would highlight that these gardens are largely shielded by the London Plane tree in the garden of Walham Court, as such it is considered that there is only limited potential for overlooking.
- 5.60. We would highlight that the scheme previously refused in May 2012 (2012/0916/P) proposed an extension where the massing would be closer to Walham Court, with windows facing the property and its gardens. The scheme was not refused on amenity grounds, and indeed the officer's report stated that:
- "No concerns are raised with regards to overshadowing, privacy issues or outlook to neighbouring properties"*
- 5.61. As shown in the drawings below, the extent of the previously refused extension, and the position of the associated window, was much closer to the gardens of Walham Court than the current proposal. There was no concern with regards to impact on amenity in terms of the garden with the previously refused application, as such it is considered that the proposals should be acceptable as the revised proposals are in fact further away.



- 5.62. With regards to sense of enclosure, the one window on each upper floor which is near to the distance range quoted in the pre-application feedback (6.5m), is the window serving the kitchen to the northern end of the elevation (please refer to Appendix B of the accompanying Design and Access Statement). It is considered that 6.5m is an acceptable distance from the kitchen window at Walham Court so as not to have an unacceptable impact on sense of enclosure. In any case, bearing in mind this only effects on window on the first, second, third and fourth floors (a total of four windows), it is considered that a balanced view should be reached bearing in mind the benefits this proposals offers (new residential units and upgraded hostel units).
- 5.63. Enclosed within the 'proposed' set of drawings are an annotated set of 'privacy distance' floorplans, showing the respective distances between windows at various levels. In addition, it shows the location of the windows in the flank elevation of Walham Court, and the rooms to which they serve.
- 5.64. At ground floor level, the existing brick boundary wall restricts direct overlooking of the neighbouring property to the north.
- 5.65. Accordingly, it is considered that the new residential units will not give rise to any adverse amenity issues in terms of privacy and overlooking. The new windows to the hostel rooms are not considered to represent a significant worsening of amenity, given the respective distances between this rear elevation and Walham Court, and the oblique (i.e. not direct) glimpses involved.

Daylight/Sunlight

- 5.66. In terms of sunlight and daylight, a Daylight, Sunlight and Overshadowing Report has been prepared by Deloitte and accompanies this application. The report concludes that any effect of the proposals to Walham Court will be within the BRE Guideline criteria.
- 5.67. As requested by the case officer, the report now also assesses the internal proposed daylight levels of the application building. As a result of initial assessments, the windows on the north-west elevation have been enlarged to ensure that the majority of rooms meet BRE criteria.

- 5.68. The report concludes that of the 36 bedrooms analysed, 32 will achieve the criteria set out in the BRE Guidelines. It is considered that this is an acceptable level of adherence to BRE Guidelines, which allows a degree of flexibility in its application. We note that the previous scheme refused in May 2012 (2012/0916/P) was not refused for daylight/sunlight reasons, despite being larger in massing. We note the officer's report for the refused scheme highlighted four bedrooms which failed daylight/sunlight tests (in this case, these were existing bedrooms in Walham Court). However it was concluded that, as the expectation is that daylight to bedrooms is not as high as to living rooms, the reduction in daylight to four bedrooms was considered acceptable and would not be significantly harmful to a degree which would justify refusal. Given this previous stance, it is considered that the marginal fail in internal daylight levels to four bedrooms highlighted by the Deloitte Report is acceptable given the benefits of the scheme, which include the provision of new residential units and the upgrading of existing hostel accommodation.

Noise

- 5.69. As requested in the pre-application advice, a Noise Report has been prepared and is submitted with this application. This assesses the background noise levels (such as road noise) and sets out what glazing would be required to ensure that suitable internal noise levels can be achieved in accordance with BS 8233 standards.
- 5.70. No external plant is proposed as part of this planning application.

Sustainability

- 5.71. As requested at pre-application stage, a BREEAM (domestic refurbishment) assessment in relation to the hostel units and apartments within the existing building fabric has been submitted as part of this planning application, demonstrating that the proposal will achieve a 'Very Good' rating. It confirms that 60% of credits have been achieved within the Energy & Water section and 40% in the Materials section.
- 5.72. A Code for Sustainable Homes assessment has been submitted in relation to the new hostel units, showing that these will achieve Level 4.
- 5.73. Finally, an Energy Report is submitted which confirms that the proposals will follow the Mayor of London's energy hierarchy in respect of being 'lean', 'clean', and 'green'.

Transport and Servicing

- 5.74. Due to the Council's requirement for the scheme to meet Code for Sustainable Homes Level 4, 89 cycle spaces must be provided (78 for the hostel and 11 for the residential element). These have been incorporated into the scheme as shown on the proposed plans, and are in accordance with Development Policy 17.
- 5.75. In terms of car parking, due to the requirement to provide 89 cycle spaces, the amount of car parking has been reduced to one disabled space. We note that the pre-application response welcomed the reduction in spaces and considered that less spaces complied with planning policy. As such, it is not considered that the further reduction should be considered contentious.

- 5.76. The pre-application feedback asks for delivery/servicing information in relation to the hostel. This is provided within Section 3 of the accompanying Transport Statement. In summary, there would not be any material changes to servicing and delivery as the number of hostel rooms are to stay as existing. Due to the nature of the hostel, there are currently very few deliveries and this is to remain the same. Refuse bins will be located at the vehicular access to Antrim Road, and this is also to remain unchanged.
- 5.77. As part of this planning application, a Construction Traffic Management Plan is submitted which sets out how construction traffic will be managed during the lifetime of the development.
- 5.78. We can confirm that our client agrees to 'car-capped' development and are willing to enter into a legal agreement in this regard.

Trees and Landscaping

- 5.79. A landscaping scheme is proposed, including a communal garden for exclusive use by the new residential units located in the eastern section of the site, adjacent to the Haverstock Hill elevation.
- 5.80. In addition to planting, shrubs and foliage, existing trees adjacent to or near to the site will be protected. At the rear, where the extension is proposed, the building has been designed to ensure there is no adverse impact on the root systems or canopy of these trees as a result of the new building.
- 5.81. An arboricultural report prepared by Landmark Trees which concludes in respect of the current set of proposals that they will not harm the root system of these trees and also sets out the measures proposed to ensure their protection during construction. This follows meetings with Alex Hutton, a tree officer at the London Borough of Camden, whereby the footprint of the proposed rear extension and the location of the bicycle storage areas were confirmed as being acceptable.

Planning Obligations

- 5.82. Our client is happy to agree to a legal agreement for the following obligations:

- Car-capped development
- Construction management plan
- Open space contribution

- 5.83. Our client's solicitor details are as follows:

Susanna Weatherstone, Fladgate LLP

sweatherstone@fladgate.com

+44 (0)20 3036 7240

6. Conclusion

- 6.1. The proposed extension to the existing building is considered to be entirely appropriate to the site and the area, given its north-facing aspect within the existing 'cloister' of the building. No hostel accommodation will be lost, instead the proposals will re-provide enhanced hostel accommodation within this highly accessible area of Camden, in addition to 9 new residential units.
- 6.2. The 'golden thread' of the National Planning Policy Framework is the sustainable use of buildings and land. This proposal is highly sustainable in respect of land use, ensuring a protected land use is maintained whilst at the same time providing new residential units on the site. It is a more efficient use of the building.
- 6.3. The location, height, bulk, scale, design and materials used in the new rear extension will ensure there is no adverse impact on the character or appearance of the building, or the wider conservation area.
- 6.4. The new entrances being created to serve the new residential units are reflective of the existing building, and replicate the detailed design, location, and materials found on entrances elsewhere on the building.
- 6.5. Nine new residential units are proposed, providing a mix of units in a sustainable location. New bicycle parking facilities are provided to the new residential units in addition to the existing hostel.
- 6.6. The proposed scheme has been designed in order to respect and protect the amenities of surrounding residents and the also to achieve a high level of sustainable design. In addition, there will be no adverse impact on the existing trees on the site, or adjacent sites.
- 6.7. In conclusion, the proposed scheme is considered to accord with the policies of the National Planning Policy Framework, the London Plan, and the adopted policies of the London Borough of Camden.

7. Appendix 1

Date: 28/07/2014
Your ref:
Our ref: 2014/2610/PRE
Contact: Olivier Nelson
Direct line: 020 7974 5142
Email: Olivier.nelson@camden.gov.uk

**Advice and Consultation
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Dear Ms. Handscomb

Town and Country Planning Act 1990 (as amended)
Re: England's Lane Residences, London, NW3 4XY

Thank you for your enquiry received on the 2nd April 2014, regarding the proposed extension, alteration and change of use to provide 9 self-contained flats.

Background

The subject site is occupied by a 4 storey building, with additional accommodation at mansard roof level and basement level. The property is in use as a hostel with Camden Council as its tenant. The building is within the Belsize Park Conservation Area and is described as a positive contributor to the area. The site has 3 frontages on Haverstock Hill, England's Lane and Antrim Road. To the north-east of the site is Walham Court, a residential block. To the north-west are houses fronting Antrim Road.

This is a follow-up pre-application following the feedback received from the last application - 2013/2494/PRE. The proposal has been amended and now involves conversion of 1 of the wings into 9 self-contained Class C3 flats. The part of the property to remain as hostel accommodation for homeless people is proposed to be extended in the rear such that, there is no net loss of hostel rooms, albeit the floor plan is modified and room sizes will vary compared to the current available floor space.

Proposal

Extension to main wing into the existing rear courtyard, conversion of eastern wing to provide 9 self-contained units. The hostel rooms which would be lost in the conversion would be provided in the main building

- The property is to be extended to the rear of the site within the eastern courtyard area
- Provision of 9 self-contained flats.
- Re-provision of 162 hostel rooms.
- Alterations to openings with a new brick entrance bay and new entrance door added to the Haverstock Hill entrance for the users of the 9 self-contained units.

This would be accessed via a security gate. The design of the door would be in keeping with the entrance on Antrim Road.

- Provision of new window above the main entrance door to help replicate the appearance of the Antrim Road entrance.
- New bicycle storage facilities are to be found within the courtyards
- A new recycling/storage area would be within the residential wing.
- Solar PV panels on the roof top which would be sunk into the existing roof.

Relevant History

2012/0916/P: Erection of new rear wing comprising 4-storeys and roof (behind L-shaped block), alterations to existing L-shaped block fronting England's Lane/Haverstock Hill including replacing existing roof storey with new brick sheer storey and erection of new roof level all in connection with provision of 35 additional hostel rooms and refurbishment of 15 existing hostel rooms (Sui Generis) and provision of covered cycle parking. **Refused 30/05/12.** *Reasons for refusal related to the amenity of the proposed flats, impact of the proposal on the trees in the immediate area, inappropriate mix of dwelling sizes, lack of legal agreement for car-capped housing.*

Principle – land use

The proposed alteration and additions are in accordance with policies for maximising the efficient use of sites, subject to material planning considerations including those set out in this response

The loss of hostel accommodation for homeless people is generally resisted under policy DP8 of Camden Development Policies 2010, however replacement by adequate accommodation that meets the DP8 criteria is acceptable. Many of which would be larger in size than the previous rooms which would be lost.

Where the council is satisfied that a development involving the loss of accommodation for homeless people or vulnerable people is justified, it is expected that the development would provide an equivalent amount of residential floor space for other vulnerable people or for older people or for permanent housing in use class C3, including an appropriate amount of affordable housing having regard to policy DP3. In this instance the rooms lost would be re-provided. There would be no reduction in the number of hostel rooms which is accepted to be in line with policy.

Policy DP8 seeks the retention of hostel accommodation for homeless people unless they are no longer needed. At present the Council is reviewing future needs. I understand you are in discussions with Bonny Stevens (Head of Temporary Accommodation Group) regarding hostels in the borough.

The new residential accommodation as well as replacement hostel rooms would need to conform to Lifetime Homes standards.

Design

- The property is not listed, but is within the Belsize Park Conservation Area and England's Lane residence makes a positive contribution to the Conservation Area.
- The proposed scheme would see external changes to the front of the site, although the main work would take place to the rear of the building.
- The proposal would see the addition of a new entrance on Haverstock Hill for the self-contained units. This entrance would replicate the entrance on Antrim Road. The entrance would project marginally from the building and would have one arched window which would match the existing window on the elevation and a timber door. The brick cornice and brick piers would match those on the Antrim Road entrance.
- The separate residential entrance via Haverstock Hill would be accessed via a pedestrian gate from Haverstock Hill. The bicycle storage facilities would be stored within the communal garden fronting the Haverstock Hill.
- The proposals are considered acceptable in principle but would be subject to detailed elevations and full details of proposed materials.

Neighbour amenity

- Policy DP26 (Managing the impact of development on occupiers and neighbours) is relevant with regards to amenity issues.
- The previous application was refused due to a sense of enclosure and outlook of the hostel rooms created and that the standard of living would be detrimental to users of the hostel rooms.
- The proposed rear extension which would be mainly within the footprint of the previous planning application which was refused. The hostel element of the proposal would be set further back than the residential element of the scheme from Walham Court. The building line has been set back 3.5m further than the refused scheme which was for the creation of additional hostel rooms.
- The privacy distance floor plans submitted show the distances from the boundary to the properties on Walham Court. The existing distances range from 1.8m to 2.2m for the rooms which are to be converted to residential. The extension to the hostel rooms would result in a privacy distance range between 5m to 6.95m which is significantly less than the minimum separation distance of 18m particularly at the upper levels. Given the above, the proposal is still considered unacceptable given the impact on overlooking and sense of enclosure.
- The existing boundary wall would restrict overlooking to the properties of Walham Court. It is therefore considered the additional hostel bedrooms at ground floor level only would be acceptable.
- It is felt that the stair enclosure to the rear of the building should be finished in brick to match the host building. It was discussed at the meeting about fenestration for this element and it was considered that an obscure glazing strip which could be opened would be acceptable here.
- The windows at the upper levels of the new residential units facing Walham Court would be obscured glazing which would prevent direct overlooking onto Walham Court.
- It is noted that a Daylight/Sunlight Report has been submitted that concludes that there would be no material impact on neighbours.

Type/ Quality of accommodation

- You have indicated the GIA of the individual C3 homes which would total 701.3 sq.m, and also a GEA of 941 sq.m Please note that additional C3 housing with a Gross External Area (GEA) of 1,000 sq.m or more would be expected to contribute to affordable housing under DP3 and Camden Planning Guidance CPG2: Housing. As proposed no affordable housing would be required.
- The proposed unit sizes would be in accordance with the recommended room sizes within CPG2.
- The mix of units to be provided would be 2 x 1 bed units, 5 x 2 bed units and 2 x 3 bed units. The London Plan 2011 and Camden Development Policies 2010 class large homes as homes with 3-or-more bedrooms. The proposed C3 accommodation would provide two large homes out of the nine proposed. Development Policy DP5 seeks a mix of large and small homes in all developments. Given the above the proposed mix complies with policy.

Transport

- It is noted that our transport officer Zoe Trower made transport observations on a previous application for this site (2012/0916/P).
- It is noted that you agree with the view of the transport officer that the impact on highway capacity can be addressed satisfactorily by entering into a S106 legal agreement to prevent residents of new flats from applying for car parking permits. Given the development would be car-capped the proposal is in line with policy.
- It is noted that on-site car parking would be reduced from 16 spaces to 5 spaces (2 disabled space and 3 spaces for hostel workers). This is welcomed and would comply with Core Strategy CS11 and Development Policy DP18.
- It is good to see that cycle parking will be increased for the existing use as well as for the proposed flats. A new dedicated 11-space bicycle rack is proposed on the existing hardstanding area at the rear of the building. The position of the cycle parking can be accessed from both the front of the site and the rear of the site via the existing vehicle and servicing entrance. The cycle stores should be fully covered, enclosed and secure. In total there would be 49 cycle parking spaces. The proposal would therefore be in line with Development Policy 17.
- The site is accessible by public transport and is located in a controlled parking zone which suffers from parking stress. As agreed earlier and within TTP Consulting's response the proposed residential would be car-capped and this would be agreed under a section 106 agreement.
- A delivery/servicing plan for the hostel, demonstrating how it would be managed during the construction phase should be submitted as part of any future application. This should also include the refuse and recycling storage and collection strategies and how this differs from the existing arrangement. It is not felt that an overall management plan would be necessary as the hostel and residential scheme would mainly be independent of each other.
- A construction management plan would be necessary due to the nature of the site and both the proposed conversion and extension to hostel rooms.

Trees and landscape

- The arboricultural statement discusses the sequences of works which are to be followed on the site. There should be no overall loss of trees on site and trees

should be protected during building works. The majority of the hard and soft landscaping is to remain unaltered. The changes to landscaping have been shown on the plans and this would need to be submitted at the application stage.

- The arboricultural statement proposes new planting along Haverstock Hill. The chosen species was English Oak and this would be on the far northeast corner.
- The proposal shows how trees would be protected during the construction stage in order to prevent long term damage to the trees.
- I would suggest speaking to the Camden Tree Officer Nick Bell prior to the submission just to check his happiness with what has been submitted.

Sustainability/energy statement

- The converted units would need to submit a “BREEAM domestic refurbishment” pre-assessment. This has recently replaced Eco-Homes assessments. A “very good rating” should be achieved.
- In response to the query about whether a Sustainability report would be required for the Hostel element of the scheme. Policy DP22 (Promoting sustainable design and construction) requires that non domestic developments > 500 m² are required to achieve a BREEAM ‘very good rating’ and are encourage to work to an ‘excellent’ rating. A detailed pre-assessment should be submitted with any forthcoming planning application.
- I would suggest that both elements should be included within a sustainability statement. The sustainability statement should include how the technology of solar panels was found to be the best for the site.
- A Lifetimes home statement should be submitted for the residential element of the proposed 9 units.

Planning obligations and CIL

- The likely Section 106 obligations are as follows: car-capped development, construction management plan, and open space contribution.
- In addition to any site specific obligations that may be identified in the course of the assessment, CPG8 provides guidance about the potential range of obligations. See:

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

- Guidance is also available in respect of the Mayors CIL and Camden’s emerging CIL. The proposal would be CIL liable in the respect that nine new residential units are being created. See:

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/cil-draft-charging-schedule.en>

Consultation

- We encourage you to undertake your own independent consultation and address any issues before submitting your application. This is largely due to the number of objections received with the 2012 planning application. The application would be advertised by way of site notice and a press notice due to its position within a Conservation Area.

Policies

- We recommend that you review national, regional and local policies and guidance as part of preparing your proposal and submit a fully complying scheme. Camden's policies and guidance are available to review at:

<http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/>

Supporting information

- In addition to plans (sections and elevations of the existing), the application should be supported by the following:
 - Planning statement (including explanation of how the site will be managed given the potential interaction between the hostel accommodation and nine residential units.
 - Design and access statement including lifetime homes statement;
 - Heritage Statement;
 - Transport statement;
 - Construction management plan (this should detail how the build will work and should show track diagrams etc;
 - Arboriculture implications assessment and soft/hard landscaping details;
 - Sustainability/energy statement;
 - Noise & vibration impact assessment (to deal with any proposed mechanical plan and also the impact of road noise on the proposed C3);
 - BRE daylight, sunlight, overshadowing assessment;
 - CIL liability form

Conclusion

Significant concerns exist regarding the overlooking and sense of enclosure impact to dwellings in Walham Court. Given the above, the proposal is considered unacceptable.

There would be further negotiations which would need to be carried out with the Temporary Accommodation Group.

The proposal would likely be subject to the Mayor of London's Community Infrastructure Levy (CIL). This is charged at a rate of £50/sqm of new dwelling floor space in Camden.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Control section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 5142.

Yours sincerely,

Olivier Nelson
Planning Officer – West Area Team