
Planning Statement

Generator Hostel Ltd, Macnaughton House, Tavistock Place, London WC1H 9SE

Erection of a new entrance the building, incorporating covered loggia entrance along the front façade of the building and demolition of existing steps and erection of enclosed acoustic glazed entrance including a new platform lift for luggage & disabled guests; erection of staircase to provide additional access to external courtyard; and reconfiguration of existing fire escape stairs



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Planning Resolution Partnership LLP on behalf of Generator Hostel Ltd (the “Applicant”) to the London Borough of Camden in support of a full planning application for the *“Erection of a new entrance the building, incorporating covered loggia entrance along the front façade of the building and demolition of existing steps and erection of enclosed acoustic glazed entrance including a new platform lift for luggage & disabled guests; erection of staircase to provide additional access to external courtyard; and reconfiguration of existing fire escape stair”* at Generator Hostel, Macnaughton House, Tavistock Place, London WC1H 9SE.
- 1.2 This Planning Statement provides an overview of the site and the proposals and assess the proposals against the Development Plan and other material considerations. The Statement comprises the following sections:
 - Application Site and Surrounding Area;
 - Proposed Development;
 - Planning Policy Context & Evaluation; and
 - Summary & Conclusions.
- 1.3 This Planning Statement produced by Planning Resolution LLP is submitted in conjunction with the following documents:
 - Design And Access Statement, prepared by Orbit Architects;
 - Various architectural plans (layouts, elevations, sections), prepared by Orbit Architects;
 - Acoustic Survey and Appraisal, Prepared by Sandy Brown Associates LLP;
 - Construction Management Plan, produced by City Sq. Ltd; and
 - Statement of Community Involvement, produced by Generator Hostel Ltd.

2.0 Application Site and Surrounding Area

2.1 The following provides a description of the existing site and its surroundings.

Site & Surrounding Area

2.2 The site is located within Compton Place mews, which is located on the north side of Tavistock Place. The site is accessed from Tavistock Place via a covered archway.

2.3 The property comprises a 6 storey brick building of simple Art Deco-style form built in the 1930's and is known as Macnaughton House.

2.4 To the west of the mews there is a single storey building that used to provide garage/workshop space that were once used by the Metropolitan Police. The building has recently been refurbished. To the south are the rear gardens of a residential block known as Knolly's House which fronts Tavistock Place. The rear of the building (North) faces the rear gardens of properties in Leigh Street.

2.5 The existing building on the site is not listed, but the site is within the Bloomsbury Conservation Area.

2.6 The existing building is considered to be a positive contributor within the Bloomsbury Conservation Area

Planning History

2.7 The following planning history is considered to be of relevance:

- 09/03/2102 – Planning permission (2012/0019/P) was refused for the demolition of existing main entrance at south elevation and erection of a new main entrance at the lower and upper ground floor levels with disabled access and associated works; demolition of existing night entrance along the south elevation and erection of a new night entrance and associated works; and alterations to the internal courtyard to enable its use as a smoking area.
- 26/06/2008 – Planning permission (2007/5518/P) was granted for replacement of all metal windows on all elevations to existing hostel with Crittall-style metal windows, and bricking up of various windows at ground floor on west and south elevations and at ground to 5th floors on north and side lightwell elevations.
- 23/11/2005 – Planning permission (2005/4123/P) was granted for insertion of disabled entry door at street level (Compton Place elevation) into existing student hostel building.

Pre-application Consultation

2.8 As set out in the supporting Statement of Community Involvement, produced by Generator Hostel Ltd, Generator Hostel Ltd have undertaken several meetings with both residents and Council Officers to understand the issues that arise from the hostel operations.

2.9 Generator Hostel Ltd have also undertaken public exhibition events to explain their proposals.

2.10 Engagement with the local community has resulted in the submission of this application which seeks to positively address amenity issues of concern to neighbouring residents.

2.11 Formal Pre-Application discussions have taken place with Officers of the London Borough of Camden, and both their design and general comments have been incorporated into the final proposal subject of this planning application.

2.12 It is therefore considered that the planning application is submitted in a positive manner.

3.0 Proposed Development

Description of Development

3.1 The description of the development sought under this planning application is as follows:

Erection of a new entrance the building, incorporating covered loggia entrance along the front façade of the building and demolition of existing steps and erection of enclosed acoustic glazed entrance including a new platform lift for luggage & disabled guests; erection of staircase to provide additional access to external courtyard; and reconfiguration of existing fire escape stairs

Summary of Development

3.2 Full details of the proposed development are contained within the accompanying Design and Access Statement prepared by Orbit Architects, which should be read and considered in conjunction with the drawings submitted. However, this section provides a brief summary of the proposals.

3.3 The purpose of the application is to improve the amenity of the surrounding residents. In particular the proposal seeks to minimise the noise generated from hostel guests entering and exiting the building.

3.4 This proposal therefore seeks to manage activity in Compton Place by providing a clear, easily accessible and contained entrance, an improved and more direct night entrance, and relocating the current smoking area to the rear where it can be better managed and reduce the need for guests to be in Compton Place.

3.5 The smoking area that is currently in Compton Place will be relocated to a external courtyard to the rear of the Hostel. This will reduce the need for guests to gather in the west corner of the mews and therefore reduce the through traffic.

3.6 The proposal will be a positive addition to Compton Place. The treatment of the elevation treatment responds to its setting in Bloomsbury Conservation Area. The materials will be of the highest quality and a crisp detailing will enhance both the building and the mews.

3.7 The proposal aims to improve the amenity for local residents by mitigating the noise and light pollution from the hostel and its customers.

3.8 It must be stressed that these proposals have little or no commercial benefit to the hostel they are purely to help to improve the quality of life for its neighbours.

3.9 In summary, the proposal includes:

- The erection of a new covered loggia entrance along the front façade of the building;
- Demolition of existing steps and the formation of an enclosed acoustic glazed entrance incorporating a new platform lift for luggage & disabled guests and green wall;
- Reconfiguration of existing fire escape on front façade; and
- The erection of staircase to provide additional access to external courtyard to encourage guest not to linger to the side and in front of the building.

4.0 Planning Policy Context & Evaluation

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the relevant Development Plan, unless material considerations indicate otherwise.

4.2 This section provides an evaluation of the Proposed Development against relevant planning policy. There are three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for the consideration of the proposed development.

The key planning policy documents taken into account at this stage and referred to in this Planning Statement include those listed below:

National Planning Policy

4.3 The National planning policy is set out in the form of the National Planning Policy Framework (NPPF) which was adopted on 27 March 2012. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” and supports “approving development proposals that accord with the development plan without delay”. There is also a “presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking”.

Regional Planning Policy

4.4 The first part of the statutory Development Plan is the London Plan (Consolidated with Alterations Since 2011), adopted March 2015.

4.5 The London Plan is the guiding land use and planning document for the Capital. As such it sets out the spatial strategy and policy context for how and where growth is to be accommodated. These objectives include optimising the development of previously developed land, promoting development in areas accessible by public transport and the potential for mixed use development to strengthen communities and local economies.

4.6 The Mayor’s overall objective is to promote London as a World City. The plan promotes regeneration, particularly in areas requiring physical improvement or the enhancement of employment opportunities and seeks to maximise housing provision and to facilitate the development of efficient transport systems.

Local Planning Policy

4.7 As the Site is located within the London Borough of Camden, the remainder of the statutory Development Plan comprises London Borough Camden’s Core Strategy (adopted 2010), and London Borough of Camden’s Development Management Local Plan (adopted 2010).

4.8 The following section reviews planning policies relevant to the Development and provides an assessment of how the Development positively addresses the planning policy.

Principle of Residential Development

4.9 The purpose of the application is to improve the amenity of the surrounding residents. In particular the proposal seeks to minimise the noise generated from hostel guests entering and exiting the building.

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- 4.10 The development proposals seek to improve the existing entrance to the hostel building, by enclosing the main entrance, and providing a new point of entry to the building in the form of an enclosed loggia.
- 4.11 Whilst there are no specific policies within the Local Development Framework that relate to the principle of the proposals, policy CS5 of the Core Strategy seeks to protect the amenity of Camden's residents and those working in and visiting the borough. Policy CS5 seeks to ensure that mitigation measures are required where necessary to protect the amenity of residents.
- 4.12 The existing hostel is the lawful use of this site and operates in a legitimate manner. The sole purpose of this planning application by Generator Hostel Ltd is to implement improvements to the building to mitigate the impact on amenity of nearby residents. Whilst these measures are not being required by the Council, the principle of the proposals are in accordance with local planning policy.

Design and Conservation

- 4.13 The Site is located in the Bloomsbury Conservation Area. The NPPF establishes national level guidance on the conservation and preservation of the historic environment. Para 128 requires planning applications to include a description of the significance of any heritage assets affected, including any contribution made by their setting. It notes that significance can be harmed through alteration or destruction of development within the setting of a heritage asset (Para 132).
- 4.14 In regards to design, the NPPF states that: 'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people' (Para 60).
- 4.15 London Plan Policy 7.4 states that new development should respond to its surrounding setting, to be informed by its historic context and to provide a human scale and relationship with street level activity. Policy 7.8 requires development to respect heritage assets by being sympathetic to their form, scale, materials and architectural detail.
- 4.16 The London Plan sets out a number of key policies relevant to the design of the building:
- Policy 7.2 relates to an inclusive environment and states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:
 - I. can be used safely, easily and with dignity by all regardless of disability, age gender, ethnicity or economic circumstance;
 - II. Are convenient and welcoming with no disabled barriers, so everyone can use them independently without undue effort, separation or special treatment;
 - III. Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways; and
 - IV. Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
 - Policy 7.3 states that development should reduce criminal behaviour and contribute to a sense of security;
 - Policy 7.4 encourages development to have regard to the form, function and structure of an area, and the scale mass and orientation of surrounding buildings;

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- Policy 7.5 seeks an improvement to public realm, encouraging the use of landscaping treatment, street furniture and wayfinding; and
 - Policy 7.6 states that architecture should be of the highest quality, responsive and complementary to the surrounding context and not cause unacceptable harm to the amenity of surrounding land and buildings. Development should also provide high quality indoor and outdoor spaces.
- 4.17 The design details are explained in more detail in the supporting Design and Access Statement, produced by Orbit Architects.
- 4.18 The proposed main entrance would incorporate an enclosed loggia which would ensure visitor flow is 'internalised' within the building at both the earliest and latest opportunity.
- 4.19 The new 'more visible' entrance with improved signage, will provide a more legible point of entry to the building from Compton Place, and will be visible from Tavistock Place, 'wayfinding' people to the building.
- 4.20 In addition, the application seeks permission for a new enclosed acoustic glazed entrance, which will incorporate a new platform lift for luggage & disabled guests.
- 4.21 A green wall will form the front façade of the new entrance, helping to absorb and buffer noise, whilst providing a pleasant and softer façade in this area of hard landscaping.
- 4.22 Furthermore, the application seeks the erection of staircase to provide additional access to internal courtyard to create an amenity space. In addition to providing a pleasant internalised courtyard amenity space, this will also benefit the noise issues by relocating the smoking area from the south-western corner of the building. The internal courtyard is a low-level space enclosed by the subject building and a 4m high wall (along the northern elevation) and therefore would not cause significant noise disturbance to the surrounding neighbours.
- 4.23 In accordance with policy CS14 of the Core Strategy and policy DP24 of the Development Policies Document, the proposal would be of high quality, which has regard to the form and function of the building use, is responsive and complementary to the existing building and the surrounding context.
- 4.24 The proposal to incorporate disabled access within the alterations to the main entrance of the building is in accordance with policy DP29 of the Development Policies Document, which seeks to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.

Noise

- 4.25 The purpose of the development proposals is to improve residential amenity. The planning application is supported by an Acoustic Survey & Appraisal undertaken by Sandy Brown Associates LLP.
- 4.26 London Plan Policy 7.15 states that development should seek a reduction in noise levels by minimising existing and potential adverse impacts of noise, separating new noise sensitive development from major noise sources and by promoting new technologies and improved practices to reduce noise at the source.
- 4.27 Policy DP26 of the Development Policies Document seeks to protect that the quality of life of occupiers and neighbours by only granting planning permission for development that does not cause harm to amenity.

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- 4.28 In this case, the existing hostel operates within its lawful use; however, the operators are seeking address concerns of local residents by proposing alterations to the building which positively result in improvements to amenity.
- 4.29 In summary, the Acoustic Survey and Appraisal concludes that the reduced distance in which guests will spend in Compton Place will significantly reduce the noise levels at the residences directly to the south and east of the entrance area/platform entrance, with noise levels at the residences directly overlooking the lane also experiencing a reduction in noise level but to a lesser extent.
- 4.30 It is proposed relocate the smoking area from the side of the building in Compton Place to an inner courtyard. There are some residential windows that have direct line of site to the existing smoking area. Therefore, by relocating the smoking area to the north of the site will significantly reduce noise impacts to the receptors to the south and west of the site.
- 4.31 The design of the proposed smoking area is such to discourage people spending long periods of time and to minimise noise build up. The internal courtyard is a low-level space enclosed by the subject building and a 4m high wall (along the northern elevation) and therefore would not cause significant noise disturbance to the surrounding neighbours.

Construction Management Plan

- 4.32 The construction phase of any development can have an impact on amenity. In order to ensure the disruption caused by construction is minimised, a Construction Management Plan, produced by City Sq. Ltd will be submitted and approved prior to the commencement of development. We anticipate this would be secured by planning condition, and would cover such matters as hours of work, construction-related deliveries and waste removal, and method of construction.
- 4.33 The proposal is therefore considered to be compliant with the thrust of Policy 7.15 in the London Plan by minimising existing and potential adverse impacts of noise, and promoting new technologies and improved practices to reduce noise at the source, and Policy DP26 of the Development Policies Document by seeking to protect the quality of life of occupiers and neighbours.

5.0 Summary and Conclusions

- 5.1 In summary, it is considered that the proposed development is compliant with the relevant national, regional and existing/emerging Local Plan policies.
- 5.2 It has been fully assessed against national, regional and local planning policy and has been found to comply with the policies set out in these documents.
- 5.3 Whilst, the hostel operates within its lawful use, this application seeks to make improvements to the building to minimise its impact on amenity of nearby residents.
- 5.4 The proposals are high quality design and would result in improvements to the entrance to the building, together with the relocation of the designated smoking area to the low-level courtyard within Macnaughton House.
- 5.5 The proposals have evolved following several meetings with both residents and Council Officers to understand the issues that arise from the hostel operations.
- 5.6 Generator Hostel Ltd have also undertaken public exhibition events to fully explain their proposals.
- 5.7 Engagement with the local community has resulted in the submission of this application which seeks to positively address amenity issues of concern to neighbouring residents
- 5.8 On this basis, it is concluded that there is strong policy support for the proposal and that the planning application is submitted in a positive manner.
- 5.9 In summary, we consider the proposed development accords with national planning policy guidance, the statutory development plan and other material considerations and should therefore be granted planning permission accordingly.