

CAMDEN TOWN METHODIST CHURCH

Planning Statement

Camden Town Methodist Church

December 2015

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1.0 Introduction

- 1.1 This Planning Statement has been produced by CBRE Planning to accompany the planning and conservation area consent applications for alterations to the Camden Town Methodist Church to facilitate its use for retained worship space alongside a new hotel on the upper floors. The introduction of a social enterprise hotel on the upper floors will cross-subsidise the essential structural works to make good the community and heritage asset, and provide a retained, safe place of worship for the Church congregation.
- 1.2 The proposals comprise:
- “Internal and external alterations to the existing place of worship (Class D1), including conversion of lower ground student accommodation (Class C2) to provide replacement worship space (Class D1) and flexible worship, community and ancillary hotel space at lower ground, a shared entrance at upper ground and 43 hotel bedrooms (Class C1) on upper floors, including a one storey (equivalent) extension, associated alterations to the main and side entrances and fenestration.”*
- 1.3 The Camden Town Methodist Church is in desperate need of structural repair and refurbishment. The relationship between the Camden Town Methodist Church ('CTMC') and TheWesley, social enterprise hotel operator, represents an opportunity to save the heritage asset and provide a future for the church congregation, community and building. The background to the Camden Town Methodist Church, TheWesley and their shared ethos is described in more detail in Section 2.0 of this Statement.
- 1.4 A previous application to convert the building residential uses in 2010 was withdrawn due to the breakdown in the relationship between the Church and developer (ref: 2010/4319/P). The site and its planning history are described in full in Section 3.0 and 4.0 of this Statement.
- 1.5 The new proposals aim to retain an appropriate level of worship space for the church congregation alongside flexible community space on the lower ground floor, with essential structural works to make good the heritage asset cross-subsidised by the introduction of a social enterprise hotel on the upper floors. A full description of the proposals is provided in Section 5.0.
- 1.6 The applicant and their development team have undertaken pre-application discussions and consultation over the last 18 months. This has involved discussions with Camden Officers, local amenity groups and surrounding occupiers. Full details, a summary of feedback and the applicant's response are set out in Section 6.0 of this Statement.
- 1.7 The proposals accord with all key relevant planning policies and guidance (detailed in Section 7.0) and have responded to extensive feedback from Officers and the public consultation. The compelling case for the proposals is set out in Section 8.0.

Scope of Submission

- 1.8 This Planning Statement should be read in conjunction with other documents forming part of the same submission and comprise:
- Completed Planning Application and Conservation Area Consent Form, including completed Certificate A;
 - Completed CIL Additional Information Form;
 - Planning Drawing Package which includes the site location plan, existing, for demolition and proposed plans and existing and proposed elevations and sections prepared by Manolo & White;

1.0 Introduction

- Design and Access Statement prepared by Manolo & White (including structural report);
- Draft Construction Management Plan, including draft Construction Management Transport Plan, prepared by Morgan Tucker;
- Draft Hotel Operators Management Statement prepared by TheWesley;
- Heritage Statement prepared by Heritage Collective;
- Daylight/Sunlight Assessment prepared by Behan Ltd
- Sustainability/BREAAM Assessment prepared by CBRE;
- Noise Impact Assessment prepared by CSG Acoustics;
- Phase 1 Preliminary Risk Assessment; and
- Policy DP1 Feasibility and Viability Report (redacted) by TheWesley.

2.0 Background to Proposals

The Camden Town Methodist Church

- 2.1 The applicant is the Camden Town Methodist Church ('CTMC'). CTMC is part of the Islington and Camden Mission Circuit, which comes under the oversight of the Methodist Conference.
- 2.2 CTMC currently has 38 confirmed members, with another 49 Adherents on the community roll. Membership of practicing Methodists has increased over the past 30 years but the community role (the total number of Members plus Adherents) has severely declined over the same period. The CTMC currently has 49 persons on its community role compared to 103 in 1985. The membership of the CTMC over the past 30 years is shown in Table 2.1.

	1985	1995	2005	2015
MEMBERSHIP	25	31	38	38
COMMUNITY ROLL	103	85	60	49

Table 2.1 – CTMC Membership

- 2.3 The Church is also used on a Sunday by two other Christian congregations, a Brazilian church and a Korean church. This brings a very small income in for the Church. Otherwise the community involvement of the Church is limited, due to the poor state of its premises. The lower ground floor was previously let as affordable student accommodation (four rooms), however, this area was deemed unsafe in 2008 and is no longer in active use. The Church no longer benefits from this small income stream.
- 2.4 The lack of members on the community role means that the Church has had issues in finding appropriate leadership for the Church, and consequently they do not have the appropriate skills to manage the site meaning that the premises are slowly falling into disrepair. A 'Church Perspective' document on the context to the proposals is appended (Appendix 1).
- 2.5 A steel frame is currently supporting the rear wall of the church (which is structurally unsound). The rental for the steel frame and the lease payments on the ground on which it stands have been a continuing drain on the financial resources of the church with no benefit to the church, save that the church is still standing. A long term solution is needed to save the church building and its congregation.

The Church Building

- 2.6 The costs of maintaining the Church have become too high for CTMC to sustainably continue to manage. The lack of a good quality facility also means that CTMC cannot attract new members. The current facilities are capable of holding 850 members, but CTMC has only 38 confirmed members. The existing worship space is therefore much larger than is required by the current congregation.
- 2.7 The CTMC has considered options for redeveloping the site to avoid it becoming an unusable, vacant building. Without significant repair, it is considered that the membership will continue to decline and it is likely that the Church will close within a decade.
- 2.8 The congregation and the Islington and Camden Mission Circuit are not in a financial situation to enable the Church to redevelop the site without substantial external funding. It is important for the CTMC that they retain an amount of worship space at the site and that the site remains under the ownership of CTMC; something which is not always possible or viable in redevelopment proposals. This was evidenced in the breakdown in the relationship

2.0 Background to Proposals

between the Church and the developer in previous pursued proposals (see Section 4.0 – Planning History).

- 2.9 In order to achieve their aims of receiving external funding, maintaining worship space and retaining ownership of the site, CTMC have partnered with the Methodist International Centre (MIC) who trade as TheWesley Hotel. MIC is also under the auspices of the Methodist Conference, albeit with a different role, and consequently has the same Methodist ethos, goals and aspirations. This makes TheWesley an ideal partner for CTMC.

TheWesley

- 2.10 TheWesley was founded as a self-funding social enterprise in 1998. It operates using an ethical business model, transforming under or unused Methodist premises back into viable community assets.
- 2.11 TheWesley’s pilot project is TheWesley in Euston, which offers 100 4* rooms and conference facilities, predominantly for use by visiting academics and students. Any surplus funding from this hotel is used to provide bursaries and other support for educating young people in the UK. This contributes to the wider social enterprise, which has so far supported 10,000 students all over the UK. The model has already been successfully implanted at an operational level in Rome for over a year, and has been accepted at the planning stage in Birmingham.

The relationship between CTMC and TheWesley

- 2.12 TheWesley is considered as an ideal development partner for the Church; as both TheWesley and CTMC are part of the Methodist Church.
- 2.13 TheWesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference. This arrangement provides the CTMC with a steady income stream which will no longer have to be used to maintain the building.
- 2.14 The partnership ensures that an important community and heritage asset remains in use.

3.0 Site and Surroundings

THE SITE

- 3.1 The site comprises 89 Plender Street, and is almost entirely occupied by the Methodist Church building.
- 3.2 The Church is situated on the southern side of Plender Street to the west of Camden High Street. It is bound by King's Terrace to the west, a mixed use mews street. To the south it is bound by housing that extends from Bayham Street. Further residential dwellings are situated to the east.
- 3.3 The Church was constructed in 1889/1890 and currently comprises two main floors: the lower ground and upper ground. The entrance is located at street (ground level) and you must travel up or down to the appropriate floors of the building. The Church has an attractive classical style façade and pedimented front and is noted in the Camden Town Conservation Area Appraisal and Management Strategy (2007) to make a positive contribution to the Conservation Area.
- 3.4 The main access to the Church is via a stepped entrance from Plender Street. There is a secondary side access from Kings Terrace. There is no parking provided on site, but the site has a Public Transport Accessibility Level (PTAL) of 6b (the highest accessibility level). It is approximately 0.1 miles north of Mornington Crescent tube station and 0.3 miles south of Camden Town tube station, which both have access to the Northern Line and good connections to central London and wider national rail services.
- 3.5 The lower ground floor was last used as student accommodation, comprising of four studios. The area was deemed to be unsafe in 2008 and has not been used as student accommodation since. Many of the rooms now lie empty or serve as storage areas for the Church.
- 3.6 The main worship space is located on the upper ground floor. It is surrounded by a balcony/gallery which is again considered unsafe. The congregation are struggling to manage the Church premises, with much of the building beyond the worship area in disrepair. The Church currently serves as a place of worship for 38 members and Adherents. It also provides two Christian congregations, a Brazilian Church and a Korean Church with a place of worship.
- 3.7 Moreover, the building is no longer considered to be structurally sound. The rear wall has been supported by shoring. This was initially proposed to be a temporary measure but has now been in place for over ten years as the Church has been unable to fund long term repairs. The shearing extends outside of land belonging to the applicant, meaning that much of the Church's income goes towards paying for the rental of the frame and lease payments for the land. This is not a sustainable solution and will eventually drain the Church of all funding resource, leaving a community and heritage asset empty and redundant.

SURROUNDING AREA

- 3.8 The site is located within Camden Town Centre to the east of the main high street. It is surrounded by a range of commercial, leisure, and comparison and convenience retail uses to the west and north.
- 3.9 On the northern side of Plender Street, opposite the site, are a series of smaller commercial units, including a variety of restaurants, a hairdressers and a nail salon. The southern side of Plender Street, to the west of the site are further commercial units, including an estate agent and a further restaurant. A small market occupies the west end of Plender Street,

3.0 Site and Surroundings

along St Pancras Way. This market contains 11 pitches and sells mainly bric-a-brac items and second-hand clothing.

- 3.10 Immediately to the west of the site is Kings Terrace, which contains live/work units with commercial understood to be on the ground floor and residential above.
- 3.11 To the east, Plender Street turns more residential in nature, comprising a series of housing estate of c. 4-5 storeys in height as well as traditional Victorian housing. A more modern housing estate (c. 1980) is located immediately to the south of the Church, also accessed via King's Terrace.

4.0 Planning History

- 4.1 This Section provides an overview of the application site's planning history and any notable relevant developments within the immediately surrounding area.

The Site

- 4.2 Camden's Planning Application Register provides records of planning applications post-1947. Research set out within the Heritage Statement, which accompanies this planning submission, indicates the Church was built in 1889/1890. Thus there is no record of the development on Camden's Planning Register.
- 4.3 The following records of planning applications at the site are available online. However, the amount of information accompanying and explaining the permissions varies.
- 4.4 Planning permission was granted in 1980 for the change of use of the basement from church hall to a student hostel (ref: 29884). This permission was implemented, although the use has now ceased due to the structural condition of the building.
- 4.5 An application for alterations to the existing building, including conversion of basement student accommodation to ancillary meeting halls and creation of 6 x 1-bedroom residential units on new first floor mezzanine level, and associated alterations to doorways and fenestration was submitted on 13 October 2010 (ref: 2010/4319/P).
- 4.6 The scheme received an officer's recommendation to grant planning permission and conservation area consent and Camden's Development Control Committee resolved to grant planning permission and conservation area consent on 7 April 2011, subject to a Section 106 agreement.
- 4.7 We understand that due to the Church and developer failing to reach agreement on a number of issues, a Section 106 was never completed and the application was subsequently withdrawn. In particular, the CTMC raised concern that:
- The proposed scheme retained insufficient, appropriate no worship space;
 - The building would no longer be under the ownership of the Methodist Church; and
 - The congregation did not have the facility or skills to successfully manage the project if it stayed within their ownership.
- 4.8 Despite not retaining a designated worship space, the 2010 application did provide a community hall and flexible community/church uses at basement and ground floor levels for use by the wider community. Paragraph 6.13 of the Officer's Report stated that these types of uses were welcome in Camden, which is experiencing greater demand for affordable community space. It was concluded that the proposals to introduce six residential units would enable the Methodist Church to upgrade their community facilities for the benefits of the congregation and the wider community. However, as outlined above, the Church and developer could not reach agreement of management issues. This, coupled with concerns over the worship space, led to the breakdown of relationships between the developer and the Church and the application was withdrawn.
- 4.9 The applicant considers that the current proposals provide a preferable arrangement for retaining dedicated worship space; allowing the Church to retain freehold ownership but not having direct responsibility for management. In these ways it overcomes the management issues associated with the previous application.

4.0 Planning History

Surrounding Area

King's Terrace

- 4.10 The development at 11-19 & 23-31 Bayham Street and 8-24 Kings Terrace is of relevance to this scheme due to the potential of the proposals to impact upon the residential amenity of the occupiers. In 1993, permission was granted (ref: 9300539) for redevelopment to provide part 2-, part3-storey buildings on King's Terrace and Bayham Street, comprising 16 residential units, 8 parking spaces and garden area.
- 4.11 In January 2007, planning permission was granted (ref 2006/4922/P) at 26 King's Terrace for the change of use of ground floor from light industrial to a 1x2 bedroom self-contained flat with new lightwell and associated external alterations.
- 4.12 In June 2010, planning permission was refused (ref 2010/2036/P) at 37-39 King's Terrace for the change of use from office/workshop (B1) to three self-contained flats (C3) including creation of a new mansard roof, new courtyard, external and internal alterations. This was refused on the fact that the alterations were incongruous alterations to the site's mews character as well as lack of sufficient parking, absence of a car-free agreement and absence of payment for highway works.
- 4.13 In November 2010, planning permission was granted (ref 2010/3893/P) at 37-39 King's Terrace for the change of use from office (Class B1) to three flats with the erection of a mansard roof and alterations to the front elevation. This site is noted as having a positive contribution to the Camden Town Conservation Area. The original façade of number 39 was retained which was welcomed by the Camden Town Conservation Area Advisory Committee (CAAC).
- 4.14 A scheme was proposed in 2012 at 23-27 King's Terrace for the change of use and works of conversion from industrial (B2) to theatre (sui generis). This application (ref: 2012/5499/P) was refused due to concerns over residential amenity (Policy CS5 and Policies DP26 and DP28) and increase in car movements (contrary to Policy CS11 and policies DP16 and DP18). The Church proposals will be car free and thoroughly consider the criteria set out in Policy DP26. A Noise Assessment is also submitted to ensure the surrounding residential properties are not subject to unacceptable levels of noise.
- 4.15 The planning history of King's Terrace is useful precedent for the proposals as it ensures that they can overcome issues which have been raised before in relation to impact on residential amenity, parking, design and loss of particular uses.

Other notable schemes in the surrounding area

- 4.16 On 30 October 2013, planning permission was granted (ref 2013/1969/P) for the redevelopment of 30 Camden Street to provide a 3-4 storey block for 14 affordable self-contained flats as well as redevelopment of 67-72 Plender Street to provide two 4-5 storey blocks for a new Class D1 community centre, replacement A1 retail units and 31 market residential units.

5.0 The Proposals

OVERVIEW

- 5.1 The planning application proposes the partial change of use of the lower ground floor of the site to provide replacement worship space (D1), with flexible multi-purpose space for worship, community use and ancillary hotel use (43 hotel bedrooms distributed over the upper floors).
- 5.2 In order to retain the attractive frontage of the building and allow the Church to continue to contribute to the Camden Town Conservation Area, it is proposed that a reinforced concrete frame be inserted into the building and new floors created internally.
- 5.3 The proposals will also require a small, sensitive roof extension. Without this extension, the building would not provide enough floorspace for hotel uses to be viable at the site.
- 5.4 The application seeks permission for:

“Internal and external alterations to the existing place of worship (Class D1), including conversion of lower ground student accommodation (Class C2) to provide replacement worship space (Class D1) and flexible worship, community and ancillary hotel space at lower ground, a shared entrance at upper ground and 43 hotel bedrooms (Class C1) on upper floors, including a one storey (equivalent) extension, associated alterations to the main and side entrances and fenestration”.
- 5.5 This Section describes the current proposals in detail, whilst Section 6.0 explains how the current proposals have responded to comments and concerns.

REDEVELOPMENT

- 5.6 The proposed development comprises:
 - Insertion of reinforced concrete frame to brace the existing external walls;
 - One storey equivalent roof extension with sensitive materials to reflect the character of the conservation area and to ensure that the building continues to make a positive contribution;
 - Amendments to the front entrance of the building to provide ground level access;
 - Changes of use as follows:
 - Change of use of ground floor from student accommodation (C2) to dedicated worship space (D1), multi-purpose room and back-of-house/staff area for the hotel;
 - Change of use of upper ground floor to provide lobby/reception area for the hotel and a small vestibule; and,
 - Change of use of first to third floors and a one storey extension to provide hotel accommodation (C1) on first to fourth floors, in addition to a small office for the church at first floor.

PROPOSED USE AND FLOORSPACES

- 5.7 The existing and proposed floorspaces by uses are detailed in Table 5.1.

5.0 The Proposals

	EXISTING (GIA SQM)	PROPOSED (GIA SQM)
Student Accommodation (C2)	278	-
Church Use (D1)	557	113
Multi-Purpose Space	-	49
Shared Space	-	316
Hotel (C1)	-	1053

Table 5.1: Existing and Proposed Floorspace by Use

- 5.8 The proposals provide CTMC with 87 sqm of dedicated worship space, which provides space for 63 members. This allows the current congregation to attract more members without providing too much space that the proposals become unviable.
- 5.9 The shared, multi-purpose space will be used as a breakfast room for the hotel guests, but will be available for church and community use for the remainder of the day.
- 5.10 The hotel provides 43 rooms, all of which are fitted with at least a double bed, a WC/shower room, a desk space and a storage unit. There are also four accessible rooms. The layout of all the rooms is designed to maximise efficiency. All rooms, apart from those on the fourth floor, will benefit from unique views onto the inside of the church, reminding guests of where they are staying and ensuring that the Church remains the centre of the proposals. Further to this, the rooms will all be finished with a simple pallet to reflect the values and philosophies of CTMC.

EXTENSION AND EXTERNAL ALTERATIONS

Proposed Roof Extension

- 5.11 A one storey equivalent roof extension is proposed to the site (see proposed drawing pack). The extension is necessary to ensure that enough hotel rooms are provided to make the scheme viable.
- 5.12 The Design and Access Statement provides more details of the materials used to ensure that the impact of the roof extension is minimal and remains subservient to the main Church building.

Plender Street Elevation

- 5.13 The proposals sympathetically create improved accessibility from Plender Street to ensure that the site is accessible to all. Level access will be created at the main Plender Street entrance by lowering the existing stepped entrance. This entrance will be shared by the Church and Hotel. Additional entrances are provided along King’s Terrace.

Kings Terrace Elevation

- 5.14 A reconfigured entrance is proposed to be created on the corner of King’s Terrace and Plender Street which will be solely for the use of the Church and related services. A new entrance is created along the King’s Terrace elevation for access to the bin and refuse store.
- 5.15 The Design and Access Statement provides more information on the access to the building.

5.0 The Proposals

Rear Elevation

- 5.16 The rear wall is currently being supported by a large steel support which extends into Kings Terrace car park. This wall is structurally unsound and it is considered that it cannot be saved. It will be rebuilt to replace the existing.

TRANSPORT AND ACCESS

- 5.17 The proposed development is intended to be car free.
- 5.18 Six cycle parking spaces are provided on site for long term and short term use.

SERVICING, DELIVERIES AND WASTE MANAGEMENT

- 5.19 A dedicated waste store is provided at lower ground floor level and is accessed by the extended opening from King’s Terrace. Details of operational management including servicing, deliveries and waste management is set out in the draft Operational Management Plan.

6.0 Pre-Application Advice and Consultation

OVERVIEW OF PRE-APPLICATION ADVICE AND CONSULTATION

- 6.1 Since the partnership between TheWesley and CTMC has emerged, the applicant has sought pre-application advice from the London Borough of Camden (LBC) Officers, consultation with the surrounding occupiers and offered opportunities for discussion with Ward Councillors and the Camden Town Conservation Area Advisory Committee.
- 6.2 This approach has provided opportunities for feedback prior to submission of the application. The current proposals have sought to respond to address the previous concerns of Officers.

FORMAL PRE-APPLICATION

- 6.3 The following dates constitute the key milestones in the pre-application process:
 - 23 October 2014 – First pre-application meeting on-site with, then, Case Officer to discuss proposals;
 - 10 November 2014 - Receipt of formal pre-application response from Case Officer;
 - 21st May 2015 – Site meeting with new Case Officer and Design Officer;
 - 2nd June 2015 – second pre-application meeting to discuss revised proposals with Case, Design and Conservation officers.
 - 23 June 2015 - Receipt of second formal pre-application response from Case Officer.
- 6.4 The pre-application advice resulting from the second pre-application meeting and subsequent design team response can be summarised as follows:

COMMENT	RESPONSE
<p><i>“The community use is not being completely retained here but reduced in size; however it is acknowledged that the church’s needs have reduced over time and there is a need to undertake significant repair works to the building, which would make complete retention impracticable here. The retention of a portion of the existing worship space to meet the current needs of the local community is therefore welcomed in this location”</i></p>	<ul style="list-style-type: none"> ■ A proportion of worship space continues to be retained in the building. This space has been agreed between the design team and church.
<p><i>“the community space for the church appears to be ancillary to the hotel with access via the shared entrance, so any application must clarify your intentions regarding the operation of different uses here”</i></p>	<ul style="list-style-type: none"> ■ Dedicated worship space is positioned at the front of the building at lower ground floor level. This benefits from several access points: it shares the main entrance from Plender Street with the hotel and has a separate entrance via the Church vestry from King’s Terrace, close to the junction with Plender Street. Full details of access arrangements are set out in the Design and Access Statement.

6.0 Pre-Application Advice and Consultation

<p><i>“The Council would wish to secure the retained church space as a community facility and to ensure that the breakfast room, to be used flexibly by both the hotel and the church users, is controlled in terms of its operation and management via a S106 legal agreement”</i></p>	<ul style="list-style-type: none"> ■ The additional room at ground floor is proposed to serve as shared church and hotel space. Whilst this will be used for serving breakfast from 7am to 9am, it is proposed to be available to the Church and community during the remainder of the day. ■ As above, it is proposed that outside of the breakfast hours that this space would be available to the church and community. ■ Further detail is provided within the draft Operational Management Plan. The applicant would be willing to commit to updating this as part of their Section 106 obligations.
<p><i>“This is therefore considered to be an appropriate location for a new small hotel, subject to sufficient mitigation of the transport impacts, control of coach servicing and mitigation of impact on local residential amenity.”</i></p>	<ul style="list-style-type: none"> ■ Details of how the hotel would be run and managed, including to protect residential amenity, is provided in the draft Operational Management Plan.
<p><i>“In addition it would be important to understand the nature of the link between the retained worship space and the new hotel.”</i></p>	<ul style="list-style-type: none"> ■ Please see Drawing Pack detailing the division of dedicated worship space, hotel space and the multi-purpose room which will be available to the church and community outside of breakfast hours. ■ The draft Operational Management Plan provides initial details of how this would be managed.
<p><i>“The proposed development includes approximately 200 sqm of additional non-residential floorspace and therefore at least 50% should be self-contained residential on site in accordance with Policy DP1... You will be required to demonstrate that, given the mix of uses, additional uses of residential units will not be practically achieved on site.”</i></p>	<ul style="list-style-type: none"> ■ Please see the redacted Policy DP1 Feasibility and Viability Report and Section 7 of the Planning Statement <p>[In addition, a Policy DP1 Feasibility and Viability Report has been submitted separately which provides further (confidential) information on the implications on the TheWesley’s payback period for the development. It is considered a ‘normal’ developer would not undertake this development proposal. Moreover, it demonstrates a prolonged repayment will prevent the reinvestment of profits within the church and Methodist Council.].</p>

6.0 Pre-Application Advice and Consultation

<p><i>“The proposed removal of the front steps and lowering of the entrance level is disappointing in terms of the loss of historic fabric and radical changes to the main focal element of the frontage. However the existing change in levels in terms of access from the street to the church is understood to be complicated and obstructive particularly for those with mobility issues. We therefore are able to support the removal of the steps and the reordering of the entrance. The details of the columns, windows, paving and front door will need to be agreed. A suggestion would be to use and re-lay the existing stone steps thereby retaining the existing material.”</i></p>	<ul style="list-style-type: none"> ■ The entrance proposals are retained in order to create level access both for the church community and future hotel guests. ■ Further details on the new entrance are provided in the Design and Access Statement and elevation drawings.
<p><i>“We would like the front boundary enclosure to be retained.”</i></p>	<ul style="list-style-type: none"> ■ It is now proposed that the front boundary enclosure would be retained (see Drawing Pack).
<p><i>“The proposal for the side door could be acceptable providing the design of the door and the details of the door opening are agreed. The proposal for the window is likely to be considered acceptable but the details of this will need approval”</i></p>	<ul style="list-style-type: none"> ■ Further detail on the side door is provided on the King’s Terrace elevation drawing.
<p><i>“The proposed designs which bring the roof extension right up behind the front pediment and parapet would create an overwhelming and inappropriate bulk to the building’s street frontage... ... is strongly recommended that if a roof addition is proposed, the maximum possible for this building would be a single addition. However it is expected that all sides of the roof extension should be set back from the elevations on all sides.”</i></p>	<ul style="list-style-type: none"> ■ The pre-application submission proposed a double height roof extension. ■ The height and massing of the proposed extension has now been significantly reduced during the design process. ■ It has been minimised in height and set back from the building edge to reduce its appearance in views. ■ See Design and Access Statement for further detail on design evolution.
<p><i>“Whilst the building is not listed, the interior is of considerable interest and we therefore ask that the interior is fully recorded as a building of local interest, prior to any demolition.”</i></p>	<ul style="list-style-type: none"> ■ The interior will be fully recorded prior to strip out.
<p><i>“The increase in size above that which exists on site has the potential to impact on the occupants of the nearest dwellings of King’s Terrace and Camden Street through</i></p>	<ul style="list-style-type: none"> ■ A daylight and sunlight assessment has been prepared which accompanies the planning submission.

6.0 Pre-Application Advice and Consultation

<p><i>loss of outlook, sunlight and daylight to the nearest rooms. Any future application may have to be accompanied by a daylight and sunlight assessment to demonstrate that the impact is acceptable."</i></p>	<ul style="list-style-type: none"> ■ It concludes that all but two windows pass at least one of the BRE studies. The neighbouring windows will automatically remain adequately lit and will comply with the BRE criteria in the urban context.
<p><i>"In addition the site is bounded by residential in close proximity on Bayham Street. New uses on the site need to be designed to avoid the potential for overlooking of neighbouring windows."</i></p>	<ul style="list-style-type: none"> ■ The scheme retains the existing window openings, adding new windows only at the mansard extension level. The existing windows do not align with the hotel bedrooms, as the scheme is based upon a concrete frame erected internally within the existing buildings. This reduces any opportunities of direct overlooking from the new hotel bedrooms into the residential units.
<p><i>"Any development on the site would be required to be car-free such that all occupiers would not be entitled to on-street parking permits. This would be secured through a Section 106 agreement."</i></p>	<ul style="list-style-type: none"> ■ Accepted by the applicant
<p><i>"Cycle parking will be required in accordance with London Plan Table 6.2".</i></p>	<ul style="list-style-type: none"> ■ Three long term cycle spaces will be provided within the hotel (accommodated in Room B1.19 - Bike Store). ■ The proposals will also provide at least three spaces to the front of the building for congregation use and visitors.
<p><i>"A draft Construction Management Plan (CMP) would also be required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site etc"</i></p>	<ul style="list-style-type: none"> ■ A draft CMP has been submitted to accompany the application based on the information available at this stage.
<p><i>"You are strongly encouraged to engage with neighbouring occupiers and the CAAC at an early stage in the process, given the likely concerns that residents will have with the comings and goings of construction / delivery vehicles."</i></p>	<ul style="list-style-type: none"> ■ A public exhibition event took place on Monday 16th November 2015 (see below for further detail).

Table 6.1 – Pre-application comments and responses

6.0 Pre-Application Advice and Consultation

PUBLIC CONSULTATION

- 6.5 The below describes the public consultation activity undertaken by the applicant and The Wesley.

Political Engagement

- 6.6 The Wesley notified the Leader of the Council and Ward Councillors (via email) of the redevelopment proposals for the site. Emails were sent to Cllr Sarah Hayward and Councillor Ali on 16 October 2015 notifying councillors and offering a meeting if considered appropriate. The Council acknowledged a response to confirm the notification had been received and that councillors would be in touch if interested to hear more at this stage. Ward Councillors were also notified of the public exhibition event. To date, Ward Councillors have not contacted The Wesley or Camden Methodist Church in response to this offer.

Camden Town Conservation Area Advisory Committee

- 6.7 The Camden Town Conservation Area Advisory Committee ('CAAC') was contacted initially to notify them of the proposals for the building of heritage merit. No response was received to an offer to meet. The CACC were also emailed on 2 November 2015 to notify them of the public exhibition – again no response was received.

Public Exhibition

- 6.8 A public exhibition event was held on Monday 16th November 2015 on-site. The exhibition boards are appended to the Planning Statement, and included a board on construction management. Over 70 leaflets advertising the exhibition were delivered to local residents and businesses (the consultation radius was confirmed with the Case Officer). No comments received during the public exhibition exercise related to construction management.

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PLANNING POLICY FRAMEWORK

- 7.1 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act). The National Planning Policy Framework (NPPF) (March 2012) is a material consideration in the determination of planning applications.
- 7.2 In assessing and determining development proposals, the NPPF sets out that local planning authorities should apply the presumption in favour sustainable development.

DEVELOPMENT PLAN

- 7.3 In London the development plan comprises the Borough plan and the London Plan.
- 7.4 This section identifies the principal policies applicable to the determination of these proposals and the principal material considerations.
- 7.5 The statutory development plan for the site comprises:
- The National Planning Policy Framework (NPPF) 2012;
 - The London Plan (As amended March 2015);
 - London Borough of Camden Core Strategy (November 2010); and
 - London Borough of Camden Development Policies (November 2010).
- 7.6 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the NPPF and London Plan are the most recently adopted policy of the above mentioned, where there is a difference in policy the NPPF and/or London Plan takes precedence although in all cases, where possible, the proposals have sought to achieve the highest defined standards.

OTHER MATERIAL PLANNING CONSIDERATIONS

- 7.7 As set out above, the NPPF forms a material consideration in the determination of planning applications. Other material considerations include (inter alia) at the national, London and local levels:
- Planning practice guidance (PPG)
 - GLA Social Infrastructure SPG (May 2015);
 - GLA Town Centres SPG (July 2014)
 - GLA Accessible London: Achieving and Inclusive Environment SPG (October 2014)
 - GLA Shaping Neighbourhoods: Character and Context (June 2014)
 - GLA Sustainable Design and Construction SPG (April 2014)
 - CPG 1 Design (July 2015)
 - CPG 3 Sustainability (July 2015)
 - CPG 5 Town centres, retail and employment (September 2013)
 - Camden Town Conservation Area Appraisal (October 2007)

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EMERGING DEVELOPMENT PLAN

- 7.8 Emerging policy also has the ability to be considered as a ‘material consideration’ in the determination process but this depends on the stage it has reached in the adoption process.
- 7.9 The GLA are currently in the process of progressing minor alterations to the London Plan, in relation to housing and parking standards. Public consultation took place from 11 May to 22 June 2015; with a schedule of ‘suggested changes’ issued on 21 August 2015. An EIP took place from 21 – 22 October 2015 and the Minor Amendments are expected to be adopted shortly. Where relevant, revised parking standards are referenced within this Section of the Planning Statement.
- 7.10 At the local level LBC are in the process of re-consulting on their Local Plan. LBC consulted on a draft version of their emerging Local Plan earlier in 2015. No further version has been published to date and given the understood early stage of the new Local Plan the proposals are assessed against the existing adopted policies.
- 7.11 A detailed overview of the relevant planning policies applicable to these proposals is set out in this Section, with commentary on the interpretation of the policies and other material considerations, and how they apply to these proposals, set out in Section 8.

CENTRAL GOVERNMENT GUIDANCE

National Planning Policy Framework (NPPF)

Presumption in Favour of Sustainable Development

- 7.12 National planning guidance is contained within the National Planning Policy Framework (NPPF) (March 2012). It introduced a presumption in favour of sustainable development where development proposals that accord with up-to-date development plan should be approved without delay (Para 14). There are three dimensions of sustainable development, economic, social and environmental, which cannot be delivered in isolation
- 7.13 It sets out the core planning principles that underpin the planning system (Para 17), which include:
 - Taking account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs;
 - The effective use of land should be encourage by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental quality; and,
 - Conserving heritage assets in a manner appropriate to their significant, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Delivering Sustainable Development

- 7.14 To help achieve economic growth, LPAs are directed to plan proactively to meet the development needs of business and support an economy fit for the 21st century (Para 20).

Ensuring the Viability of Town Centres

- 7.15 Planning policies should be positive and promote competitive town centres. The town centre should be recognised as the heart of communities (Para 23).

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Requiring Good Design

- 7.16 Well-designed buildings and places can improve the lives of people and communities (Para 8).
- 7.17 Section 7 of the NPPF requires good design in all development. Planning decisions should aim to ensure that developments (Para 58):
- Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
 - Respond to local character and history and reflect the identify of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - Are visually attractive as a result of good architecture and appropriate landscaping.
- 7.18 Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concern about incompatibility with an existing townscape, if those concerns have been mitigated by good design (Para 65).
- 7.19 Applicants will be expected to work closely with those directly affected by their proposal to evolve designs that take account of the views of the community. Proposals that can demonstrate this in development the design of the new development should be looked on more favourably (Para 66).

Conserving and enhancing the Historic Environment

- 7.20 Section 12 sets out policy guidance in respect to conveying and enhancing the historic environment. In determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Para 128).
- 7.21 Para 131 sets out that in determining applications, LPAs should take into account:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic viability;
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 7.22 Proposals that preserve elements that make a positive contribution to or better reveal the significance of Heritage Assets (including Conservation Areas) should be treated favourably (Para 137).
- 7.23 Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm (and policies of

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paragraph 133 applied) or less than substantial harm (and policies of paragraph 134 applied), as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole (Para 138).

- 7.24 Accordingly, Para 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm or less is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.25 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal, including securing its optimum viable use (Para 134).
- 7.26 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (Para 135).

STATUTORY DEVELOPMENT PLAN

Further Alterations to the London Plan (March 2015)

- 7.27 The London Plan sets out the Mayor's vision until 2031 to:
- “excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change”.*
- 7.28 The objectives are to ensure London is:
- A city that meets the challenges of economic and population growth;
 - An internationally competitive and successful city with a strong and diverse economy and entrepreneurial spirit;
 - A city of diverse, strong, secure and accessible neighbourhoods; and
 - A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

London's Places

- 7.29 The London Plan's focus for Inner London is to realise its potential in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and

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new communities, whilst improving the quality of life and health for those living, working, studying or visiting there (Policy 2.9).

- 7.30 London's town centres should be the main focus for commercial development and intensification, including residential development beyond the Central Activities Zone (Policy 2.15). This policy outlines that development proposals within town centres should confirm with Policies 4.7 and 4.8 and:
- a) Sustain and enhance the vitality and viability of the centre
 - b) Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
 - c) Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services
 - d) Be in scale with the centre
 - e) Promote access by public transport, walking and cycling
 - f) Promote safety, security and lifetime neighbourhoods
 - g) Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
 - h) Reduce delivery, servicing and road user conflict.

London's Economy

- 7.31 The plan supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres (Policy 4.7). The scale of retail, commercial, cultural and leisure development should be related to the size, role and function of a town centre and its catchment. Development should be focused on sites within town centres, or if no in-centre sites are available edge of centre sites which can be well integrated with the existing centre and public transport should be considered.
- 7.32 The Mayor, boroughs and other stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision (Policy 4.5). Outside the CAZ, visitor accommodation should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to Central London and international and national transport termini. London should achieve 40,000 net additional hotel bedrooms by 2036 of which at least 10% should be wheelchair accessible.

London's People

- 7.33 London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population (Policy 3.16). Social infrastructure, defined in Annex Six, includes community facilities and places of worship. Policy 3.16 continues that development proposals which provide high quality social infrastructure will be supported in light of local and strategic infrastructure needs assessments. The suitability of redundant social infrastructure for other forms of social infrastructure of which there is a defined need in the locality should be assessed before alternative developments are considered. Facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

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- 7.34 Supporting paragraph 3.91 states that voluntary community groups often find it difficult to find premises suitable for their needs; unused or underused facilities should be brought back into use as much as possible to help their accommodation needs. The additional use or reuse of places of worship should be considered for the purpose of providing accommodation for use by other traditions or other faiths and/or wider community functions.

London's Response to Climate Change

- 7.35 The Mayor's energy hierarchy is to:
- be lean, use less energy;
 - be clean, supply energy efficiently; and,
 - be green, use renewable energy (Policy 5.2).
- 7.36 The Mayor has set targets for carbon dioxide emissions reductions. Between 2013-2016, a 40 per cent improvement on 2010 Building Regulations will be sought for non-domestic buildings (Policy 5.2). Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions are to be met within the framework of the energy hierarchy. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu.
- 7.37 Targets are proposed for minimum improvements over the Target Emission Rate: 44% improvement on 2006 Building Regulations (residential and domestic buildings between 2010-2013). Where targets cannot be met on site any shortfall can be provided offsite or through payment in lieu.
- 7.38 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 7.39 Regard should be had to sustainable retrofitting of existing buildings. Opportunities for reducing carbon dioxide emissions from the existing building stock should be taken by identifying potential synergies between new developments and existing buildings through the retrofit of energy efficiency measures, decentralised energy and renewable energy opportunities (Policy 5.4).
- 7.40 The Mayor's objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to. The draft Minor Alterations to the London Plan Housing Standards and Mayor's Draft Interim Housing SPG also give up to date guidance on London-wide targets/ requirements following the withdraw of the Code for Sustainable Homes into Building regulations.
- 7.41 The draft Minor Alterations to the London Plan Housing Standards continue to encourage developers to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy.
- 7.42 The key change is proposed alterations to LP Policy 5.2 in relation to reductions. The draft amended policy requires a 35% reduction on the 2013 Building Regulations between 2014-2016 (previously it was against 2010). There remains the requirement to achieve zero carbon developments from 2016 onwards. Draft policy 5.2 now also includes a statement setting out how these reductions should be achieved stating that in line with the energy hierarchy above, these targets should be met through a combination of energy efficiency

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measures on-site, and low and zero carbon infrastructure, either on or off-site, in line with the decentralised energy policies.

London’s Transport

- 7.43 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 7.44 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 7.45 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in Table 6.3.
- 7.46 Maximum car parking standards are set out in Table 6.2. In addition, developments must ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

London’s Living Places and Spaces

- 7.47 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of “secured by design” (Policy 7.3).
- 7.48 Development should have regard to the form, function or structure of an area (Policy 7.4). In areas of poor character it should build on positive elements that can contribute to establishing character.
- 7.49 Development should make the public realm comprehensible with gateways and focal points (Policy 7.5).
- 7.50 Architecture should contribute to a coherent public realm, streetscape and wider cityscape (Policy 7.6). Buildings should:
 - Be of the highest architectural quality;
 - Be of a proportion, composition, scale and orientation that enhances, activates and appropriately redefines the public realm;
 - Comprise details and materials that complement, not necessarily replicate the local architectural character;
 - Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;
 - Incorporate best practice in resource management and climate change adaptation and mitigation;
 - Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
 - Be adaptable to different activities uses, particularly at ground floor;
 - Meet the principles of inclusive design; and
 - Optimise the potential of sites.
- 7.51 New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail. It should make provision for the protection of archaeological resources (Policy 7.8).

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- 7.52 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be “air quality neutral” and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 7.53 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).

LB Camden Local Development Framework

Site Designations

- 7.54 The site is not subject to any site specific allocations. The site is located within Camden Town Centre and Camden Town Conservation Area.

Relevant Policies

- 7.55 The relevant policies from LBC Core Strategy (2011) comprise:
- CS1 (Distribution of Growth)
 - CS3 (Other highly accessible areas)
 - CS5 (Managing the impact of growth)
 - CS6 (Providing quality homes)
 - CS8 (Promoting a successful and inclusive Camden economy)
 - CS10 (Supporting community facilities and services)
 - CS11 (Promoting sustainable and efficient travel)
 - CS13 (Tackling climate change through promoting higher environmental standards)
 - CS14 (Promoting high quality places and conserving our heritage)
- 7.56 The relevant policies from LBC Development Policies (2010) comprise:
- DP1 (Mixed use development)
 - DP2 (Making full use of Camden’s capacity for housing)
 - DP9 (Student housing, bedsits and other housing with shared facilities)
 - DP14 (Tourism development and visitor accommodation)
 - DP15 (Community and leisure uses)
 - DP16 (The transport implications of development)
 - DP18 (Parking standards and limiting the availability of car parking)
 - DP22 (Promoting sustainable design and construction)
 - DP24 (Securing high quality design)
 - DP25 (Conserving Camden’s heritage)
 - DP26 (Managing the impact of development on occupiers and neighbours)
 - DP28 (Noise and vibration)
 - DP29 (Improving access)

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Principle of development

- 7.57 The Council will focus Camden’s growth in the most suitable locations and manage it to make sure that its opportunities and benefits are delivered and that it is sustainable (Policy CS1). Appropriate development will be encouraged at highly accessible locations including the town centres. The Council will seek to promote the most efficient use of land and buildings by seeking development that makes full use of the site, taking into account the quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Council will expect a provision of a mix of uses in suitable schemes, including an element of housing where possible.
- 7.58 The Council will promote appropriate development in the highly accessible town centres (Policy CS3). These areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. The development in these areas will be of suitable scale and character for the area in which it is situated and should contribute to other Council aspirations.
- 7.59 The Council will require a mix of uses in development where appropriate in all parts of the borough (Policy DP1). Within town centres, where more than 200 sqm gross additional floorspace is provided, LBC will require up to 50% of all additional housing to be housing. The Council will require any secondary uses to be provided on site particularly where 1,000 sqm (gross) of additional floorspace or more is required. Where inclusion is appropriate but cannot be included on site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu.

Community Uses

- 7.60 LBC will ensure that community facilities and services are provided for people who work in and visit the borough (Policy CS10). This includes providing a range of community facilities to support Camden’s growing population. LBC will support the retention and enhancement of existing community, leisure and cultural facilities and will facilitate the efficient use of community facilities and the provision of multi-purpose community facilities at a single, accessible location.
- 7.61 Policy DP15 sets out that the Council will protect existing community facilities by resisting their loss unless:
 - a. A replacement facility that meets the needs of the local population is provided or
 - b. The specific community facility is no longer required in its current use.

The policy continues that to help meet increased demand for facilities the Council will expect suitable developments to make rooms available for local community groups to use or hire at a discounted rate.

Student Accommodation

- 7.62 The Council will resist development that involves the net loss of student housing (policy DP9) unless either:
 - c. adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or
 - d. the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs.

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Hotels

- 7.63 Policy CS8 recognises the importance of tourism as an employment generating use. The Council will support tourism development and visitor accommodation by allowing smaller scale visitor accommodation in town centres including Camden Town (Policy DP14). All tourism development and visitor accommodation must be easily reached by public transport, provide necessary off-highway pick up and set down points for taxis and coaches and not harm the balance and mix of uses in the area.

Design

- 7.64 The Council will require all developments, including alterations and extensions to be of the highest standard of design (Policy DP24). LBC will expect developments to consider:
- e. Character, setting, context and the form and scale of neighbouring buildings;
 - f. The character and proportions of the existing building, where alterations and extensions are proposed;
 - g. The quality of materials to be used;
 - h. The provision of visually interesting frontages at street level
 - i. The appropriate location for building services equipment;
 - j. Existing natural features, such as topography and trees;
 - k. The provision of appropriate hard and soft landscaping including boundary treatments;
 - l. The provision of appropriate amenity space; and
 - m. Accessibility.
- 7.65 Furthermore, Policy CS14 requires development of the highest standard of design that respects local context and character, seeks the highest standards of access in all buildings and places and promotes high quality landscaping.
- 7.66 The Council will also seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities (Policy DP29). All buildings will be expected to meet the highest practicable standards of access and inclusion and must be designed to be as accessible as possible.

Heritage

- 7.67 Camden will preserve and enhance the borough's rich and diverse heritage assets and their settings, including conservation areas (Policy CS14).
- 7.68 In order to maintain the character of Camden's conservation areas, LBC will (of relevance to the proposals):
- n. Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
 - o. Only permit development within conservation areas that preserves and enhances the character and appearance of the area; and,
 - p. Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

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Impact on adjacent occupiers

- 7.69 Protecting high standards of amenity is a key element in maintaining Camden's attractiveness as a place to live and work. The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity (Policy DP26). The factors for consideration include visual privacy and overlooking, sunlight, daylight and artificial light levels and noise and vibration levels. Developments are also required to provide:
- q. Facilities for the storage, recycling and disposal of waste;
 - r. Facilities for bicycle storage; and
 - s. Outdoor space for private or communal amenity space, wherever practical.
- 7.70 Policy DP28 states that the Council will seek to ensure that noise and vibration is managed and control. The Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these oases are likely to cause harm, condition and planning obligations may be used to minimise impact.

Transport and Highways Impacts

- 7.71 The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links (Policy DP16). Safe pick-up and drop-off areas as well as waiting areas should be provided where this activity is likely to be associated with the development.
- 7.72 The Council will seek to ensure that developments in town centres are car free (Policy DP18). For car free proposals the Council will limit onsite parking to spaces for disabled people and operational or servicing needs. Developments will also be expected to meet the minimum standards for cycle parking.
- 7.73 The London Plan standards are considered to supersede these.

Sustainability and climate change

- 7.74 The Council will require all development to take measures to minimise the effects of and adapt to climate change (Policy CS13). All development is encouraged to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.75 Schemes must demonstrate how sustainable development principles have been incorporated into the design proposal and proposed implementation (Policy DP22). Developments of over 500 sqm should achieve a "very good" BREEAM assessment until 2016.

8.0 Planning Assessment

- 8.1 This section of the Planning Statement provides an assessment of the proposed development in relation to the planning policies and material considerations set out in the preceding sections.
- 8.2 It is considered that the key planning issues, arising from pre-application discussions and from public consultation are:
- Principle of Redevelopment;
 - Land uses:
 - Reduction in quantum of community (D1) floorspace
 - Loss of student accommodation (C2) floorspace
 - Proposed hotel (C1) floorspace
 - Policy DP1 Mixed Use Requirement;
 - Design and Conservation;
 - Impact on surrounding residential amenity;
 - Transport and highways; and,
 - Sustainability.

PRINCIPLE OF REDEVELOPMENT

- 8.3 The Camden Town Methodist Church is in desperate need of structural repair and refurbishment (see Design and Access Statement and the appended structural report). The costs of maintaining the Church have become too high for CTMC to sustainably continue to manage. The lack of a good quality facility also means that CTMC cannot attract new members (see Section 2).
- 8.4 The CTMC has considered options for redeveloping the site to avoid it becoming an unusable, vacant building. Without significant repair, it is considered that the membership will continue to decline and it is likely that the Church will close within a decade.
- 8.5 The congregation and the Islington and Camden Mission Circuit are not in a financial situation to enable the Church to redevelop the site without substantial external funding. As explained in Section 2, The CTMC and The Wesley have entered a partnership to introduce hotel uses into the existing church building, alongside a retained element of church and community space on the lower ground floors, to cross-subsidise the necessary significant structural works to the Church and introduce a long-term revenue stream.
- 8.6 The Church cannot physically or viably be reused in its existing condition. Significant repair works are required; albeit the applicant has sought to achieve these within the existing fabric of the building insofar as possible. In addition to the creation of additional floors within the existing building envelope through the introduction of a new internal concrete frame, a one storey (equivalent) extension is required in order to provide sufficient floorspace for the church and a viable hotel. The scheme results in a net uplift in GEA floorspace of 746 sq m.
- 8.7 The NPPF, London Plan and Camden's policies, inter alia, direct the effective use of brownfield land, support social and cultural facilities and protect heritage assets in a manner appropriate to their significance.

8.0 Planning Assessment

- 8.8 The site falls within Camden Town centre which is specifically identified within Camden's Core Strategy as a suitable location for growth. Accordingly, the principle of growth in this location is support in national, London and Camden's policies.

LAND USE

Reduction in quantum of community (D1) floorspace

- 8.9 The redevelopment of the Church results in an overall loss of community (D1) floorspace. The existing site provides 557 sqm (GIA) of dedicated worship space, whereas the proposals provide 98 sqm of dedicated worship space as well as 49 sqm (GIA) of multi-purpose shared space for use by both the church and community and 11sqm office for Church use. This provides a total of 158 sqm (GIA) of D1 space.
- 8.10 Overall there is a net loss of 410 sqm of community (D1) floorspace. The NPPF, London Plan and Camden policies seek to protect community floorspace. Notwithstanding this and as set out in Section 7, the NPPF and statutory development recognise the challenges faced by community facilities and that their re-use and/or release should be managed.
- 8.11 Camden Policy DP15 sets out that the Council will protect existing community facilities by resisting their loss unless a replacement facility that meets the needs of the local population is provided or the specific community facility is no longer required in its current use.
- 8.12 The existing church floorspace could provide for c. 850 people (were the gallery to be usable). However, the current practicing congregation (confirmed members) is only 38. The existing D1 floorspace significantly exceeds the Church's requirements and does not represent an efficient use of floorspace; nor can the facility be sustained by the CTMC or Camden and Islington Methodist Circuit. Moreover, due to health and safety issues associated with the existing building it cannot be let to other community groups.
- 8.13 Without significant repair, CTMC consider that the membership will continue to decline and it is likely that the Church will close within a decade (see Section 2 and Appendix 1). This would result in the total loss of a community asset and decline of the CTMC.
- 8.14 One of the key objectives of Camden's Core Strategy is to support and encourage the provision of facilities and services needed to meet the needs of Camden's communities (Core Strategy paragraph 32). In specific reference to religious groups, Camden Council seeks to help them find space to meet their need for faith facilities (supporting paragraph 10.12 of Core Strategy Policy CS10)
- 8.15 Policy CS10 specifically sets out that the Council will 'support the retention and enhancement of existing community...facilities' and 'facilitate the efficient use of community facilities and the provision of multi-purpose community facilities that can provide a range of services to the community a single, accessible location.' Moreover, the London Plan recognises that the additional use or reuse of places of worship should be considered for the purpose of providing accommodation for use by other traditions or faiths and/or wider community facilities (London Plan Para 3.91).
- 8.16 158 sq m (GIA) of D1 floorspace is re-provided in the proposals. This is comprised of an area of dedicated worship space (87 sq m) providing worship space for up to 63 people and a further multi-purpose shared space (49 sq m) to be available for use by both the church and community; with the potential for expansion into the shared space should the Church membership increase.

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- 8.17 By re-providing dedicated worship space the proposals will continue to support the CTMC. In addition, the proposals will enable space within the existing building to be made available to the wider community in accordance with the London Plan and Camden Policy CS10.
- 8.18 In providing an enhanced and viable long term facility for the CTMC and offering the potential to provide for a range of other community groups, the loss of an element of community (D1) space is considered to be offset by the long term benefits the deliverable proposals will offer. Without the development proposals it is likely that the Church will close within a decade. We therefore consider that the loss of an element of community D1 floorspace is justified against policy.

Loss of student accommodation (C2)

- 8.19 Policy DP9 sets out that the Council will resist the loss of student accommodation unless adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or that the accommodation is no longer required and it can be demonstrated that there is no local demand for student accommodation.
- 8.20 The site provides a small number of student rooms (four units). These are of poor quality and were closed in 2008 due to health and safety concerns. The rooms were not associated with any higher education institution and formed an ancillary use to the D1 church floorspace; having been let through the Church network. Accordingly, the accommodation was not subject to active management.
- 8.21 It is considered that the student accommodation could not be brought back into active use without significant investment to both the accommodation and the church more generally. The Church and the Camden and Islington Methodist Circuit are not in a financial position to fund this (see Section 2 and Appendix 1).
- 8.22 Were it possible to bring the student accommodation back into active use it is not considered there is significant demand for low quality, small scale accommodation. Significant new student accommodation has recently been completed within the London Borough of Camden, or is currently under construction, including in proximity to the site the Unite and Urbanest student accommodation blocks at St Pancras. Camden's 2013/2014 AMR shows that completed developments in Camden have provided an extra 1,116 student rooms since 2009. Moreover, there are a number of units in the pipeline including Midland Crescent (ref: 2013/2564/P), 65 – 69 Holmes Road (ref: 2013/7130/P) and 4 Wild Court (ref: 2013/4789/P). These new residencies provide a significantly higher quality standard of accommodation than that within the Church and have affiliated higher education institutions; thus benefitting from more active student management.
- 8.23 Given that the existing student accommodation is unfit for use, has been vacant for over seven years and significant new accommodation meeting students' needs is coming forward elsewhere within the Borough it is considered the relatively minor loss (four units) can be justified against the Policy DP9 tests.

Proposed Hotel (C1) floorspace

- 8.24 The proposed development will provide a new 43 bedroom hotel in Camden Town Centre (c. 1053 sq m C1 floorspace). It is therefore considered to constitute smaller scale visitor accommodation.

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- 8.25 The London Plan and Camden’s Policy CS8 recognises the importance of tourism as an employment generating use and directs such development to the borough’s town centres where there is good public transport access to central London.
- 8.26 The site lies within Camden Town Centre and has a PTAL rating of 6b (the highest). It is therefore considered to be within a suitable location for small scale hotel development in accordance with London Plan Policy 4.5 and Camden Policy CS8.
- 8.27 The proposed hotel operator, TheWesley, is a social enterprise and a fundamental component of its business model is generating local employment and local benefits. As explained in Section 2, TheWesley is also part of the Methodist Circuit and has the same shared goal of the Church for worship space to remain at the heart of the proposals.
- 8.28 TheWesley will fund the physical works to make good and extend the building in its conversion to a mixed use building. The Hotel is required to enable both the retention of the church community and of the physical building.
- 8.29 Moreover, the relationship between CTMC and TheWesley ensures that the Church retains freehold ownership of the site and a long term revenue stream. It will ensure that the Church retains a strong presence within the building alongside the new hotel use.

POLICY DP1 MIXED USE REQUIREMENT

- 8.30 The proposed development results in the uplift of 746 sq m (GEA floorspace).
- 8.31 By virtue of the site’s location and the proposed uplift in floor space Policy DP1 applies to the development proposals. This requires where more than 200 sq m gross additional floorspace is provided, 50% of all additional floorspace to be provided as housing. The Policy notes that the Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed.
- 8.32 However Policy DP1 (a) – (i) sets out a number of considerations as to whether a mix of uses should be sought, whether it can be practically achieved on site, the most appropriate mix of uses and the scale and nature of any contribution to the supply of housing.
- 8.33 It also sets out that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu.
- 8.34 Table 8.1 below summaries the existing floorspace, the floorspace uplift and thus the Policy DP1 requirements.

Existing floor space:	961 sq m GEA
Proposed floor space:	1707 sq m GEA
Uplift floor space:	746 sq m GEA
Target for on-site housing:	746 X 50% = 373 sq m GEA

Table 8.1 – Policy DP1 requirements

- 8.35 Policy DP1 requires the provision of 373 sq m residential floorspace.
- 8.36 Part 1 of the Policy DP1 Feasibility and Viability Report which has been prepared as part of the planning application submission documentation demonstrates that it is not appropriate, practical or feasible to achieve residential floorspace on the constrained site as part of the mixed use proposals for the building. In particular, the Report and its accompanying drawings, highlights having regard to DP1 considerations (a) – (i) and Development Management Policies Para 1.19 – 1.24, that:

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- The introduction of residential accommodation would result in a reduction in the space available to church and hotel uses. The extent of the extension, and therefore available floorspace, has reduced significantly during the pre-application process in response to comments from Camden Design and Conservation Officers (see Design and Access and Planning Statements). This has resulted in a drop in space available to both the church and hotel, although it has predominately been the hotel floorspace which has been lost during these design revisions. A further drop in hotel floorspace and therefore bedrooms is considered to make the hotel unviable (the confidential Policy DP1 Financial and Viability Report contains details on viability).
 - Providing on-site residential would generate the requirement for a separate access, core and other circulation spaces. This would require significant amendments to the scheme design, in particular the lower ground floor, and is not considered practicable within the (reduced) proposed building envelope.
 - Providing on-site residential would also generate requirements for further 'back of house' facilities such as waste, recycling and cycling parking. Again this would increase ancillary floorspace and reduce the quantum available for church and hotel uses. It is not considerable practicable within the (reduced) proposed building envelope.
 - Providing on-site residential would likely generate the need for additional plant which could not be incorporated within the building envelope.
 - The applicant, CTMC, wish to retain ownership of the building. The Wesley will operate the propose hotel with the building being managed by the Methodist Council on behalf of the Methodist Conference. As described in Section 3, the CTMC previously pursued a residential scheme at the site (ref: 2010/4319/P) however this was rejected by the Church due to lease and management arrangement issues. The current partnership arrangement is accepted by the Church. Introducing residential would compromise this.
- 8.37 Accordingly, on-site residential provision is not considered appropriate, practicable or feasible at the site.
- 8.38 Part 2 of the Policy DP1 Feasibility and Viability Report sets out the implications of the scheme viability of providing a payment in lieu. Whilst Policy DP1 provides exceptional circumstances for publically funded developments it does not list out charities or social enterprises as an exception. It is worth noting however that whilst the CTMC is not a registered charity due to its income falling below £100,000 it is 'an exempted charity under Statutory Instrument 2014 No. 242'. The proposed operator, The Wesley is a small social enterprise whose profits are spent by its parent charity, The Methodist Council to support student's education in UK and all over the world.
- 8.39 The DP1 payment in lieu would significantly prolong The Wesley's payback period for development and prevent the reinvestment of profits within the church and Methodist Council. It is considered that other developers would not undertake this development proposal at the low viability levels.

DESIGN AND CONSERVATION

- 8.40 As set out in Section 6.0, the applicant has undertaken pre-application discussions with LBC Planning, Design and Conservation Officers and offered opportunities for discussion with CAAC, Ward Councillors and surrounding occupiers. In particular, following the pre-application advice received on 23 June 2015, the scheme has undergone significant redesign as explained in the Design and Access Statement.

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Urban Design

- 8.41 In accordance with the NPPF and Policy DP24, the application is accompanied by a Design and Access Statement which considers how the proposed development successfully addresses:
- Character, setting, context and the form and scale of neighbouring buildings;
 - The character and proportions of the existing building, where alterations and extensions are proposed;
 - The quality of materials to be used;
 - The provision of visually interesting frontages at street level
 - The appropriate location for building services equipment;
 - The provision of appropriate hard and soft landscaping including boundary treatments;
 - Accessibility.
- 8.42 The design seeks to retain the majority of the existing building through inserting a reinforced concrete frame to brace the existing external walls, and ‘hang’ the new hotel floors. The external alterations to the building are therefore limited to the new roof extension, amendments to the main entrance on Plender Street, minor alterations to the King’s Terrace elevation and amendments to the rear elevation. These are considered to sensitively respond to the existing building and be of the highest standard of design in accordance with Camden’s Design policies.

Proposed Extension

- 8.43 The extension comprises a sensitive one storey (equivalent) extension. It has been significantly reduced during the design process and sought to be minimised whilst still achieving the required quantum of church and community floorspace and providing the minimum viable number of hotel rooms.
- 8.44 The design evolution is described in full in the Design and Access Statement. It has been significantly reduced in height and massing, and set back from the building edges on Plender Street and the side elevations so as to provide a sensitive scale which reflects the massing and bulk of other buildings in the surrounding area. The roof is also sloped to minimise its impact in townscape views.
- 8.45 In accordance with Section 7 of the NPPF the scheme is considered to optimise the potential of the site, whilst responding to local character. The extension is considered to be a proportionate response to the surrounding context in accordance with London Plan 7.6.

Building Entrances

- 8.46 The entrance on Plender Street is proposed to be revised in order to create level access for the church congregation and hotel visitors in accordance with Policy DP29 which promotes fair access and calls for the removal of barriers that prevent people from accessing facilities and opportunities. All buildings will be expected to meet the highest practicable standards of access and inclusion and must be designed to be as accessible as possible. The existing stepped entrance will therefore be lowered to provide a level access to the building from street level. This ensures that the building is universally accessible.

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- 8.47 The proposed design of the revised entrance seeks to respect the character and proportions of the existing building. The full height entrance will help improve the presence of the entrance on the streetscene creating a visually interesting frontage.
- 8.48 A series of smaller interventions are proposed along King’s Terrace to create a separate access to the church and enable access to the refuse and storage area. These amendments are minor in nature and again sensitive to the existing building.

Rear Wall

- 8.49 The rear wall of the building is proposed to be replaced, which is necessary to make the building safe and useable. As per the below, this will match the existing wall.

Accessibility

- 8.50 In accordance with Camden Policy DP29, the proposed development achieves the highest levels of inclusive design for an existing local heritage assets. In particular, the amended entrance will create level access.
- 8.51 Lifts running through the building provide access to the lower ground church and community space and hotel rooms on the upper floors.
- 8.52 10% of the hotel bedrooms will be universally accessible in accordance with London Plan Policy 4.5.

Heritage

- 8.53 The site is located within the Camden Town Conservation Area. Although it is not statutory or locally listed, however it is noted within the Camden Town Conservation Area Appraisal as making a positive contribution to the character of the Conservation Area.
- 8.54 The NPPF recognises that not all elements of Conservation Area will necessarily contribute to its significance (Paragraph 138).
- 8.55 In accordance with Paragraph 128 of the NPPF, a full assessment of the site’s contribution to the Conservation Area has been undertaken by heritage specialists, Heritage Collective. This Heritage Statement is submitted as part of the planning application documents.
- 8.56 The Heritage Statement treats the building as a non-designated heritage asset, the focus of the assessment is the conservation area. It describes the contribution of the building to the conservation area as:

“essentially its pleasant architectural treatment, primarily the imposing Plender Street façade and the King’s Terrace side elevation. It forms part of the Victorian development of the area and it represents the period as a ‘one of a kind’ structures rather than as part of an ensemble or group. The building is not remarkable for any reason and it is unsurprising that is not locally listed, but it does add character and a sense of time depth, and it illustrates the development of the area. In this sense it is a positive contributor to the character and appearance of the area”.

- 8.57 The rear elevation which is proposed to be “demolished” and rebuilt due to its poor structural condition is assessed as “unremarkable and plain” within the Heritage Statement.
- 8.58 Having assessed the significance of the non-designated heritage asset to the Conservation Area the Heritage Statement assesses the impact of the external amendments on the non-designated heritage asset. The key external change is considered to be mansard extension

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which is considered to have been designed to relate well to the host building and not have an undue presence or compromise the proportions of the building in accordance with London Plan Policy 7.8 and Camden Policies DP24. And 25 Other external changes are assessed as relatively minor and facilitate the proposed conversion of the heritage assets to secure its long term viable use in accordance with Para 131 of the NPPF.

8.59 The Heritage Statement concludes that:

“Overall, the benefits of the proposed development, including the conversion to secure a sustainable and viable long term use, would by far outweigh any residual harm... In this respect there is a compelling case, in heritage terms, for granting permission on heritage grounds”

8.60 The benefits clearly outweigh any residual harm to the heritage asset in accordance with the NPPF heritage tests and the proposals are considered to accord with the London Plan and Camden’s heritage policies.

NEIGHBOURING AMENITY

8.61 The proposed development has been considered with respect to any impacts on surrounding occupiers, in particular the residential amenities of neighbouring properties, to ensure adequate protection to their visual privacy, outlook, daylight and sunlight in accordance with Camden Policy DP26.

Daylight and Sunlight

8.62 An External Daylight and Sunlight Report has been prepared to assess the implications of sunlight and daylight on surrounding properties and forms part of this submission. In accordance with Camden Policy DP26 and BRE’s Site Layout Planning for Daylight and Sunlight (2011) this assesses all residential properties that will be affected by the development in sunlight and daylight terms.

8.63 It concludes that the VSC, ADF and No-sky/daylight distribution analysis indicates that all but two windows pass at least one of the BRE studies. The neighbouring windows will automatically remain adequately lit in the majority as a result of the development proposals and will comply with the BRE criteria in the urban context.

8.64 The sunlight and winter sunlight assessment results show that they achieve similar results and are considered acceptable when perceived in the urban context.

Privacy and Outlook

8.65 The closest properties containing elements of residential are considered to be 87 – 88 Plender Street, the properties along King’s Terrace and the properties along Bayham Street which back onto the rear of the site.

8.66 The scheme retains the existing window openings, adding new windows only at the mansard extension level. The existing windows do not align with the hotel bedrooms, as the scheme is based upon a concrete frame erected internally within the existing buildings. This reduces any opportunities of direct overlooking from the new hotel bedrooms into the residential units.

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Hotel management

- 8.67 The draft Hotel Management Plan has been prepared to accompany the planning application submission. This provides an overview of how the hotel will be managed, including details of managing visitors, staff and deliveries. It is proposed that further detail could be provided, as required, ahead of occupation.

Noise

- 8.68 In accordance with Policy DP28 and Camden's CPG6 Amenity, the issue of noise has been carefully considered in the design of the proposed scheme.
- 8.69 It is proposed to locate plant within the mansard roof, rather than located externally, both for visual and amenity purposes. A Noise Assessment has been undertaken to assess the baseline noise levels at the site and it proposes plant noise limits for any future plant equipment to ensure compliance with relevant noise planning policies and regulations.

Dropping of Lower Ground Floor

- 8.70 The proposed lower ground floor levels as generally similar to the existing (see existing and proposed drawings). The existing lower ground level is mostly maintained through the building however, at the front of the building it is proposed to drop by approximately 1 metre in order to allow for the revised ground floor entrance level. This is local to the rear of the existing vaults.
- 8.71 Camden Policy DP27 requires applicants to consider a scheme's impact on local drainage and flooding and on the structural stability of neighbouring properties through its effect on groundwater conditions and ground movement.
- 8.72 The proposed drop of the existing lower ground floor level only relates to a very minor area at the front of the building. As explained in the Structural Report (appended to the Design and Access Statement) the lowered area will be kept away from the boundary to avoid works to adjacent buildings or retaining structures. Having regard to CPG4 it is not considered that a Basement Impact Assessment is required. Notwithstanding this, a Phase 1 Desktop Report has been prepared to assess conditions at the site.

Summary

- 8.73 In accordance with Policy DP26, the applicant has had regard to considerations of visual privacy and overlooking, sunlight and daylight levels and noise and vibration levels.

TRANSPORT, SERVICING AND ACCESS

Location and Transport Impact of Proposal

- 8.74 The site has a public transport accessibility level of 6a (highly accessible).
- 8.75 The proposed development will therefore be supported by excellent public transport links in accordance with London Plan Policy 6.1 and Camden Policies DP16 and DP17.

Car and cycle parking

- 8.76 It is proposed that the development would be car free in accordance with Camden Policy DP18 which seeks car free development in town centres.

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- 8.77 In accordance with the Further Alterations to the London Plan Cycle standards, the proposals will provide a total of 6 cycle parking spaces for the church and hotel uses.
- 8.78 This is comprised of 3 long-term cycle spaces located within the lower ground floor. 2 are provided for the hotel uses and 1 for church staff. A further 3 short-stay spaces are provided externally comprising 1 for the hotel uses and 2 for church visitors. Construction Management
- 8.79 A Draft Construction Traffic Management Plan has been submitted with this application. This sets out how construction traffic will access the site. A full Construction Management Plan would be prepared subject to any planning permission and once a contractor has been appointed.

Drop-Offs

- 8.80 Any taxi drop offs/collection will occur in the lay-by outside the Church on the Plender Street elevation.
- 8.81 As set out in the Hotel Operators Management Statement, the hotel will not accept coach parties due to the small and boutique nature of the hotel.

Waste, Refuse and Servicing

- 8.82 A refuse store is located internally at lower ground level providing 2 x 1100 L Eurobins (for general waste and recycled material) and 1 x 500 L Eurobin (for food waste) in accordance with Camden’s Waste Standards set out in CPG1.
- 8.83 One existing window on the King’s Terrace elevation will be converted to a door to allow for refuse and recycling to be put out for collection and any deliveries to brought into the building. It is proposed that any waste and recycling will be put outside the building 30 minutes before Camden’s waste collection times (06.00, 18.00 or 00.00) should a collection be required that day.
- 8.84 It is proposed that all deliveries will take place on-street (King’s Terrace and/or Plender Street), due to the majority of the site being occupied by the existing building.
- 8.85 Deliveries will comply with strict procedure as set out in the draft Operational Management Statement. It is expected that the site will receive a maximum of five deliveries per day on weekdays and between two and three on Saturdays. Weekday deliveries will normally be between 08.00 and 16.00 on weekdays and between 08.00 to 12.00 on Saturdays to ensure minimum disturbance to surrounding occupiers. A full Operational Management Plan would be prepared subject to any planning permission confirming arrangements. Construction Management Plan
- 8.86 A draft Construction Traffic Management Plan has been submitted with this application in accordance with Camden Policy DP20 and DP26. This sets out how construction, including construction traffic, will be managed. A full Construction Management Plan would be prepared subject to any planning permission and once a contractor has been appointed.

ENERGY AND SUSTAINABILITY

- 8.87 In accordance with Policy DP22, the development will incorporate sustainable design and construction measures. This policy also sets out that development within Camden will be required to demonstrate compliance with BREAAAM Very Good.

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- 8.88 The BREEAM Pre-Assessment Report, submitted as part of the application documents sets out that the proposals can reasonably achieve a BREEAM Rating of Good; however, the issues that are required to achieve BREEAM Very Good are dependent on contractor deliverables, appointment of additional consultants and the post occupancy elements of the design. These would only be addressed at RIBA Stage 4 at the earliest. In accounting for these, it is expected that BREEAM Very Good could be achieved.

9.0 Conclusion

- 9.1 The proposals seek to sensitively introduce a new 43-bed hotel into the existing Camden Town Methodist Church alongside retained dedicated worship space and flexible community space.
- 9.2 The current Church building is in desperate need of structural repair and refurbishment. Its rear wall has been supported by an external steel frame, on leased land for over ten years, and many parts of the building have been rendered unusable due to health and safety issues.
- 9.3 The costs of maintaining the Church have become too high for CTMC to sustainability continue to manage. The rental for the steel frame and the lease payments on the ground on which it stands have been a continuing drain on the financial resources of the church with no benefit to the church, save that the church is still standing. A long term solution is needed to save the church building and its congregation.
- 9.4 Without significant repair the Church's membership is anticipated to continue to decline and it is considered it would likely close within a decade. The CTMC has considered and pursued various options for redeveloping the site to avoid it becoming an unusable, vacant building. The Church and the Camden and Islington Methodist Circuit as not in a financial situation to redevelop the site without significant external funding.
- 9.5 In order to achieve their aims of receiving external funding, maintaining worship space and retaining ownership of the site, CTMC have partnered with the Methodist International Centre (MIC) who trade as TheWesley Hotel social enterprise hotel.
- 9.6 The relationship between the CTMC and TheWesley represents an opportunity to save the heritage asset and provide a future for the church congregation, community and building. The introduction of a social enterprise Hotel on the upper floors will cross-subsidise the essential structural works to make good the heritage asset and provide a retained, safe place of worship for the Church congregation as well as flexible community space.
- 9.7 The proposed development will provide a long term worship space as well as a reliable income stream for the CTMC. (TheWesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference). The proposals will also remove the need for all of the CTMC assets to be directed towards maintaining the building and will allow the congregation to be more active in the community.
- 9.8 The proposals have evolved through pre-application discussions with the Council and have always been centred on ensuring the Church has a sufficient worship space at the heart of the development proposals. The application meets the Council's objectives towards providing community facilities and a mix of uses within town centres. It also protects and enhances Camden Town Conservation Area with a design which reflects the character of the area and is sensitive and appropriate to its surroundings.
- 9.9 In conclusion, the proposed development is critical to enabling a future for the CTMC. It substantially accords with the aims and objectives of the National Planning Policy Framework and the Development Plan policies. In line with the Presumption in Favour of Sustainable Development the planning and conservation area consent applications should be approved without delay.

Camden Town Methodist Church

89 Plender Street
London
NW1 0JN

The Church Perspective

Addition to Submission for Planning

1. Brief Description of the current situation:

The current congregation of Camden Town Methodist Church (CTMC) is a mostly black and of mixed age. The current church membership is listed as 38 members and the average weekly attendance is about 30.

The table below indicates that whilst the membership of the church has remained fairly stable over the period 1985 to 2015, the Community Role (those in the congregation that are not confirmed members) has dropped off dramatically. This is believed to be because they do not want to hold office within the church and therefore have responsibility for the upkeep and repair of the building.

Membership				
Date	1985	1995	2005	2015
Membership	25	31	38	38
Community Roll	103	85	60	49

The current congregation struggles to be able to manage the church premises, which have been slowly falling into disrepair due to financial constraints and lack of lay leadership. The rental for the steel frame that supports the end wall and the lease payments on the ground on which it stands have been a continuing drain on the financial resources of the church with no benefit to the church, save that the church is still standing.

At present the church building is also used on a Sunday by two other Christian congregations, a Brazilian church and a Korean church. This arrangement serves these two community groups whilst also bring in a small income to the church. Other than this CTMC has very little community involvement, due to the poor state of its premises.

2. Charitable standing

As the income is less than £100,000 CTMC is not a registered charity but is 'an exempted charity under Statutory Instrument 2014 No. 242. I quote from the Minutes of the Methodist Conference 2014...

The requirements of the Charities Act 2011 apply only to England and Wales. Methodist charities with annual income over £100,000 must

register with the Charity Commission. Methodist charities asked for their charity number should quote their registered number (if registered) or, if still excepted charities, their HMRC (Her Majesty's Revenue and Custom) Gift Aid number. If the Methodist charity does not have a gift aid number then the charity should state it is an excepted charity under Statutory Instrument 2014 No 242¹.

3. The future of Camden Town Methodist Church:

The future of the Methodist congregation in its current situation is bleak. The congregation is not attracting new members (though it often has visitors) which is probably as a result of the dire state of the premises. If the Community Roll continues to decline, then the church is likely to close within a decade. This would leave the building empty, with only a limited possibility of sale.

The premises are now beyond the point at which repair is a realistic option. The congregation at CTMC and the Islington and Camden Mission Circuit are not in a financial situation to enable them to redevelop the site without substantial external funding.

In the past CTMC has considered other possible solutions. One such proposal was to provide a housing scheme created within the current premises. This proposal was subsequently dropped for three reasons.

- Firstly, the proposed scheme had no facility for the congregation to retain a worship space within the building.
- Secondly, the church and circuit were unwilling to allow the building to be sold.
- Finally, if the building were not to be sold, then the trusteeship of the building would have to remain within the Methodist Church, with the current congregation managing it. The present congregation and the circuit do not have the facility to provide this management skill from within the present membership.

4. The proposed partnership with the Methodist International Centre trading as TheWesley:

CTMC is part of the Islington and Camden Mission Circuit, which

¹ The Methodist Church, Minutes of the Annual Conference and Directory 2014 p.150 (this is the 2014-15 edition)

in turn is part of the London Methodist District, and comes under the oversight of the Methodist Conference. The Methodist International Centre (MIC) also comes under the auspices of the Methodist Conference. Both CTMC and MIC are, therefore, part of the same organization, and whilst their roles within the Methodist Church may appear to be very different, they have the same aims and objectives and share the same Methodist ethos and organizational culture. This makes them ideal partners in this scheme.

The proposal is that MIC will lease the premises from CTMC and take over the managing trusteeship. The development of the hotel will enable the building's future to be safeguarded whilst giving the congregation a new (maintained) base from which they can work and worship.

4. The advantages to the church of the proposed scheme:

Both the Islington and Camden Mission Circuit and Camden Town Methodist Church fully support the outline plans attached to the Pre-App.

The construction of the hotel, using an internal framework will stabilize the external walls and mean that the supporting framework can be removed from the end wall.

The fact that the premises will now be managed by MIC will remove from the congregation the heavy burden of maintaining the property and give them the freedom to concentrate on 'being a church'. The income from the lease will provide them with enough money to invest in community work, possibly employing a full-time youth worker.

The proposed scheme will provide the congregation with a bright and modern worship space, which will have wheelchair access. It will be part of a building that is in use 24/7, and will be easy to heat (and keep cool in summer). The redeveloped property as well as the presence of the hotel will make CTMC an ideal venue for marriages and other activities. It is expected that, as a result of this scheme, the congregation will be able to attract new members.

Most importantly, it will mean that CTMC becomes a vibrant center for Christian worship within Camden, rather than a gradually decaying building with an uncertain future.

April 2015

THEWESLEY

Background

Methodist International Centre Ltd (MIC) trading as TheWesley is a successful accommodation operator with a strong ethical ethos, an effective business model and a strategy for growth and further development in pursuit of its charitable objectives. It was established as an independent trading Company incorporated as a private Company limited by shares to enable regular sustainable incoming resources to the Methodist Missionary Trust to be used for charitable purposes

Relationship with the Camden Town Methodist Church

The Methodist International Centre (MIC) and the Camden Town Methodist Church (CTMC) are both part of the London Methodist District and come under the oversight of the Methodist Conference. As a result they share the same goals, aspirations and ethos.

They are suitable partners for this scheme due to their shared values and vision for the successful future of the Camden Town Methodist Church. TheWesley, through the introduction of ethical accommodation on site, will be able to offer the church the financial support they require to repair and maintain the current church building. Further details on what ethical accommodation consists of are outlined below.

Both parties have the shared goal of retaining a worship space as part of the scheme to enable the congregation to grow. The management of the building by the MIC will remove the congregation's financial burden of maintaining the church building which is in desperate need of repair and maintenance. This will enable the congregation to concentrate on community work.

Precedents

MIC Ltd has developed a vision for transforming a number of under used or unused Methodist premises, thereby exploiting the value of the assets for community and congregation gain. The vision has been demonstrated through the creation of TheWesley in Euston, the first ethical accommodation and conference centre in the UK which now offers over 100 4* rooms along with conference facilities in the heart of Central London. The accommodation generates a surplus which is used for the education of young people in UK and globally through the provisions of bursaries and other assistance. The model, which includes a commitment to operating ethically, has been replicated at the Methodist Church in Rome, another in Birmingham and other sites are being considered. The majority of the guests are university academics/staff as well as post-graduate students.

How the social enterprise model benefits the community, students and staff

- TheWesley was founded as a self-funding Social Enterprise in 1998, evolving from its mother organization Methodist International House (MIH), which was started in 1950. Over 10,000 students have been supported financially in Central London in the last 65 years.
- We have provided subsidised and excellent value accommodation for international and domestic students and staff, in a safe and supportive environment in close proximity to many of London's most prestigious Colleges and Universities.
- Bursaries are offered to selected international and domestic (UK) students encompassing accommodation costs and/or tuition fees in some cases.

- As a Social Enterprise and IIP accredited employer, TheWesley is strongly committed to staff development: it also supports them with their educational endeavours. Most staff in management roles have worked their way up from a lower level. We also offer apprenticeships and internships.
- Apprenticeships are offered to local community as a way to full employment

What ethical hospitality means to us

- At TheWesley we believe passionately in ensuring that high ethical standards are practised at every level of the company's day-to-day running. We believe that businesses should act responsibly with a moral code of conduct – driven by strong values and a sense of contribution towards society.
- Our primary concerns are with people and planet. Without losing the bigger (global) picture we work hard to foster links with local community in business, sourcing and recruitment.
- TheWesley is the UK's first accredited Social Enterprise Accommodation (awarded the Social Enterprise Mark in July 2010. We operate commercially successful accommodation and conference centre where more than 50% of our profits are gift aided to support international and domestic students.
- Our organisation has a 65 year history and heritage. We are proud of our values and tradition of delivering a powerful social impact and our aim is to continue this for another 65 years and beyond. We share the Methodist Church social values (Spirituality of Hospitality).
- The commercial ethical business model and our Hilda Porter Bursary Fund is undergirded by the sustainable model whereby sensitivity towards the planet is primary.
- TheWesley has canvassed its staff for their interpretation of what makes TheWesley unique. They were asked to describe keywords that make TheWesley special to them. Some examples were: ethical, aesthetic, spiritual, fresh and seasonal food; displaying good values; business like; entrepreneurial; dynamic; partnerships' environmentally friendly; hospitable; personal service; homely; independent; modern; centrally located; near public transport; value for money.
- TheWesley identifies many organisations with whom it has synergies, and develops partnerships and collaborations in the interests of furthering our vision and increasing revenue. Partnerships include multi-faith collaborations with The Quakers at Friends House in Euston; joint venture conferences with The Alliance of Religion and Conservation; and The Methodist Church's Heritage Director Jo Hibberd with whom we have explored new initiatives.
- TheWesley has earned a reputation among its guests for being a homely environment, offering a personal, warm service to its customers.
- We offer excellent quality at very fair and reasonable prices. Our clients know that their money is going to a good cause.
- We source our supplies including food ethically, locally, organically and responsibly where possible.
- TheWesley is committed to the environmental sustainability of its operations and to spread best practice in the wider community. The accommodation and conferencing centre began formalising an effective environmental management system (EMS) in 2009 and achieved the highest international standard for environmental management, ISO 14001, during 2012. Over the last four years TheWesley has managed a highly efficient system with data records available and achieved a reduction in its carbon footprint by 21% through behavioural changes, education of staff and careful management of technical aspects.
- Our Access statement outlines our commitment to making TheWesley accessible from all perspectives.

Awards and Accolades:

- Green Tourism Silver Award since 2012
- ISO 14001 Accredited since 2012
- Winner of best Hospitality provider at Camden and Islington Awards, 2012 and 2013.
- Mayor of London Procurement Award, Silver for sustainable procurement.
- Shortlisted in the Top 5 organisations in the UK for the City of London Sustainable City Awards
- The Social Enterprise Mark
- Winner of Social Enterprise of the Year at the Institute of Financial Accountants Awards.
- Shortlisted for the award of Best Social Enterprise at The London Business Awards.
- Awarded The Camden Climate Change Mark of Achievement
- Winner of a Camden Council Environmental (ECCO) Award 2010 for Outstanding Contribution to an Organisation's Environmental Performance.
- Awarded The Cutting Carbon and Carbon Champion Marks of Achievement.

Conclusion

TheWesley provides a unique accommodation offer which mainly accommodates university academics, staff and postgraduate students. It is a social enterprise which supports the local community and local people, enabling uses to operate alongside and providing them the funding and wider security to enable them to continue to operate when confronted with significant challenges; particularly economic.

In the case of the Camden Town Methodist Church, TheWesley will relieve the congregation of the financial burden of maintaining a building which is in a poor state of repair. This will enable the congregation to focus on their community work and being a church whilst providing them with a new worship space which will attract new members. The ethical accommodation use will work alongside the church to benefit the wider community in Camden.