

**FORMER BELSIZE PARK FIRE STATION
36 LANCASTER GROVE, LONDON NW3 4PB
LONDON BOROUGH OF CAMDEN**

PLANNING STATEMENT

PROPOSED RESIDENTIAL CONVERSION AND EXTENSION OF
FORMER FIRE STATION (GRADE II* LISTED)

Prepared By



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CONTENTS

| | Page No. |
|--|-----------|
| 1. INTRODUCTION | 3 |
| 2. DESCRIPTION OF THE SITE AND SURROUNDING AREA | 5 |
| a. The Application Site | 5 |
| b. The Surrounding Area | 7 |
| 3. BACKGROUND TO THE PROPOSALS | 8 |
| 4. PRE-APPLICATION CONSULTATION / STATEMENT OF COMMUNITY CONSULTATION | 10 |
| a. Camden Council and Historic England | 10 |
| b. Local Community | 13 |
| 5. THE PROPOSED DEVELOPMENT | 14 |
| a. Initial Remarks | 14 |
| b. The Application Proposals | 15 |
| 6. RELEVANT PLANNING FRAMEWORK | 16 |
| 7. PLANNING ASSESSMENT | 17 |
| a. Land Use | 17 |
| b. Provision of Housing | 21 |
| c. Design and Heritage | 23 |
| d. Trees and Biodiversity | 24 |
| e. Neighbouring Amenities | 25 |
| f. Transport (including CMP and deliveries/servicing) | 25 |
| g. Energy, Sustainability and Drainage | 26 |
| h. CIL | 28 |
| i. S106 Contributions | 28 |
| 8. SUMMARY AND CONCLUSIONS | 29 |

APPENDICES

| | |
|---|----|
| 1. Pre-App Submission 19/06/15 - drawing extracts | 31 |
| 2. Camden Pre-Application Advice Report 18/09/15 | 35 |
| 3. Historic England Pre-Application Advice 09/07/15 | 48 |
| 4. Amended Pre-Application Submission 05/10/15 – Drawing Extracts | 52 |
| 5. Historic England Follow-Up Pre-Application Advice 13/10/15 | 58 |
| 6. Amended Pre-App Submission 10/12/15 – drawing extracts | 63 |
| 7. Historic England Follow-up Pre-Application Advice 17/12/15 | 67 |
| 8. Amended Pre-App Submission 19/01/16 – drawing extracts | 69 |
| 9. Local Community Pre-Application Consultation Comments 16/09/2015 | 72 |
| 10. Marketing Brochure | 75 |
| 11. Correspondence received from Newlon and Origin Housing Associations | 77 |

1.0 INTRODUCTION

1.1 This statement accompanies an application by Vulcan Properties, the owners of the building, for planning and listed building consent in respect of the proposed extension and conversion of the former Belsize Park Fire Station, 36 Lancaster Grove, Belsize Park.

Background

1.2 Belsize Park Fire Station closed on 9th January 2014 as part of the strategic planned closures by the London Fire and Emergency Planning Authority (LFEPA). The site now lies largely vacant.

1.3 Vulcan are proposing a new, suitable, and sustainable long term use for the building.

1.4 Belsize Park Fire Station is Grade II* listed. Such buildings are important assets. Vulcan recognises that they are an irreplaceable resource and they should conserve them in a manner appropriate to their significance. They wish to sustain and enhance the significance of the asset and put it to a viable use consistent with its conservation.

1.5 Vulcan desire to convert the building into residential use (Use Class C3) in a respectful way. A sensitive conversion of the building into residential use is considered to be the most appropriate; limiting alterations to the fabric of the building whilst securing a viable and long term secure use for the future of the building. Moreover, significant parts of the building were in residential use when the fire station was in operation, and with some parts remain in residential use to this day.

Layout of this Document

1.6 This statement provides a detailed description of the site and surrounding area in section 2.

1.7 In section 3 we provide a summary of the background to these proposals, including further information relating to the planned closure of the station by the LFEPA back in 2014.

1.8 Prior to the submission of this application, the applicants and their professional team have actively engaged with the local planning authority, Historic England and the local community. Those discussions have directly influenced the application proposals for which consent is now sought. We provide a summary of those discussions and guidance received in section 4.

1.9 In section 5 we provide a description of the application proposals. This section should be read alongside the Design and Access Statement prepared by Shaun Knight Architects (SKA), and the Heritage Assessment prepared by DLG Architects, both of which are submitted herewith as part of the planning/listed building consent application.

1.10 In section 6 we identify the relevant planning framework; followed by an assessment of the proposals against relevant policies and other material planning considerations in section 7.

1.11 As part of the planning application/listed building consent, we submit the following documents which should be read alongside this statement.

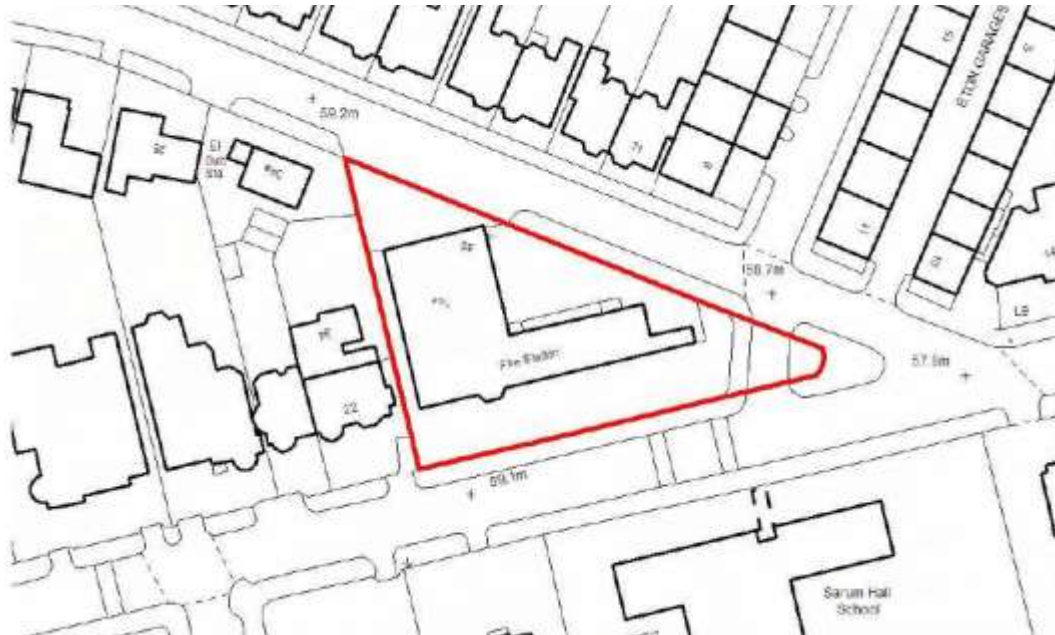
| Document | Author |
|------------------------------------|-----------------------------|
| - Heritage Statement | DLG Architects |
| - Design Statement | Shaun Knight Architects |
| - Arboricultural Impact Assessment | Challice Consulting |
| - Transport Statement | PT Planners |
| - Daylight/Sunlight Assessment | Brooke Vincent and Partners |
| - Building Regs Statement | Greendoor Building Control |
| - Energy Statement | XC02 |

- Construction Method Statement Hockley and Dawson
- Fire Regulations Strategy BB7
- Surface Water Drainage (ProForma) P Garrad
- Construction Management Plan NT+A

2.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

a. The Application Site

- 2.1 The former Fire Station lies in Belsize Park at the junction of Lancaster Grove and Eton Avenue. The triangular shaped plot comprises 0.44 acres (0.1761 hectares).



SITE LOCATION PLAN

- 2.2 The building has an L shaped plan and comprises a part basement, ground/upper ground and first floor levels. There is also a substantial roof void at second floor level, together with an internal integrated drill tower arranged over four additional upper floors.



BELSIZE PARK FIRE STATION (NORTH ELEVATIONS)

- 2.3 The building was designed by Charles Canning Winmill of the Fire Brigade Branch of the London County Council Architects Department, and erected 1914-5. The building is Grade II* listed and is considered to be of special architectural merit.



BELSIZE PARK FIRE STATION (SOUTH ELEVATION)

- 2.4 Elevations are constructed principally from brick, with stone dressings, together with pitched tiled roofs over. High architectural quality of an Arts and Crafts style is manifest in its design, detail and materials. The building is mostly intact, having not been extended or significantly altered externally; it retains its original timber appliance bay doors, plan form, and numerous other features ('greasy' poles etc).
- 2.5 The property comprises a three appliance bay/hall at ground floor fronting Lancaster Grove, together with offices, resting area, welfare accommodation, storage, washroom facilities, kitchens, toilets and other ancillary spaces. A number of these spaces, for example the main appliance hall, include a number of artefacts associated with the former fire station use. Additional storage areas are provided within a part lower ground floor, formed under the east wing of the building.
- 2.6 Over the upper floors, the majority of the building accommodates former dormitories and self contained flats, associated with former brigade staff. These residential parts are served with simple internal detailing in contrast to the robust detailing of the appliance hall and the decorative detailing of the external brickwork.
- 2.7 Parts of these areas remain in residential use to date, despite the closure of the fire station. Those areas that remain in use fall outside the scope of this application and remain unaffected by the development proposals at this stage. (Please note that those areas outside of the scope of this application are left blank/white on the planning application drawings).
- 2.8 The site benefits from a forecourt area, partly exposed to the Lancaster Grove street frontage/ partly set behind a c.2m high brick boundary wall, served by gated access. The element exposed to Lancaster Grove serves the main appliance hall and features attractive cobbled paviers. To the rear (Eton Avenue), the property enjoys outdoor/landscaped garden space, set behind a 2m high privet hedge and low fencing.

b. The Surrounding Area

- 2.9 The surrounding area is predominantly in residential use. Neighbouring residential properties are typically Victorian/Edwardian three storeys in height, the majority of which include a roof storey of accommodation served by prominent dormer windows to front and rear roof planes, semi detached or detached.



LAMBOLLE PLACE STREETSCENE

- 2.10 The main exceptions are the Sarum Hall School, an independent preparatory school for girls (aged 3 to 11) directly opposite the site on Eton Avenue. There is also a pocket of commercial uses along the west side of Lambolle Place to the north of the site, within the ground floor of converted Victorian dwellinghouses. Other retail and commercial uses are accessed to the north-east of the site along Haverstock Hill.



SARUM HALL SCHOOL

- 2.11 The property has an average access to public transport, with a confirmed PTAL of 2/3, on a scale where 1 is the worst and 6 is the best. Belsize Park, Chalk Farm and Swiss Cottage underground stations are approx 0.5 mile to the north, east and west respectively. Bus services are also available in the local area and pass the site. There is an active CPZ operating in the area restricting on-street parking to local residents. A car club bay, serving two vehicles, is accommodated on Lambolle Place along the eastern boundary of the site.

3.0 BACKGROUND TO THE PROPOSALS

3.1 On 12 September 2013 the London Fire and Emergency Planning Authority voted to approve the final version of the Fifth London Safety Plan (LSP5). LSP5 is the Authority's Integrated Risk Management Plan as set out in the government's national framework for the fire and rescue service.

3.2 LSP5 was subject to a fifteen week public consultation which ended 17 June 2013.

3.3 LSP5 outlines a wide range of policies and measures which are intended to improve the safety of Londoners.

3.4 Amongst other things, as part of LSP5, the Authority had been asked to set out proposals to find significant cost savings over the next two years.



3.5 The Commissioner delivered LSP5 which balanced the need to reduce costs with the duty to protect Londoners. LSP5 includes details of how savings of £29m will be made in the service from 2013 through to 2016.

3.6 Part of these measures reviewed the Authority's estate. The largely freehold estate comprised 112 stations, characterised by a significant number of ageing buildings; a third are listed, with a large number of those requiring repairs and improvements estimated at some £140m. An asset management plan completed in 2012 found that only 54 per cent of the fire stations were considered 'suitable' (fit for fire service purposes) and that over 40 per cent were more than 60 years old. It was determined that some of the estate would be released.

3.7 In considering how many fire engines and fire stations LFB need and where they should be located, LSP5 sets out the range of factors the LFB took into account, including:

- Keeping the response times of first and second fire engine to a minimum when attending serious incidents across London.
- Maintaining or improving achievement of attendance standards for first and second fire engines in London's boroughs.
- Keeping at least one station in every borough.
- Protecting those fire stations LFB would want to keep; those that are modern, multi-purpose and already provide good facilities for staff.
- Taking account of any restrictions fire stations have in terms of the numbers of vehicles or staff they can accommodate.
- Accommodating the plans LFB have to improve fire stations over the next few years.
- Allowing for other vehicles and activities based at the fire stations that might be difficult to relocate.
- The relative cost, efficiency and resilience of stations with two fire engines rather than one.

- 3.8 Based on the above, Belsize Park Fire Station together with stations at Bow, Clerkenwell, Downham, Kingsland, Knightsbridge, Silvertown, Westminster and Woolwich were closed, as surplus to requirements.
- 3.9 LSP5 acknowledges that there is no absolute right level of resource, and there are no benchmarks to use in order to assess what an appropriate level of resource would be. However, the Commissioner believed that it would be possible to deliver the Brigade's emergency response service with fewer resources whilst maintaining London-wide attendance performance within current standards and secure performance improvements in some boroughs.
- 3.10 The Belsize Park area is now served by the Kentish Town and West Hampstead Stations.
- 3.11 Since its closure on January 9th 2014, Belsize Park Fire Station has been largely vacant, however parts of the residential floors within the former fire station (flats and dormitories), remain in use for residential use by staff, despite the closure of the station and the occupants no longer working for the fire service. To all intents and purposes, these parts are residential. These parts are therefore outside the scope of this current application.
- 3.12 The applicants seek to convert the remaining vacant parts of the building into residential use.

4.0 PRE-APPLICATION CONSULTATION/ STATEMENT OF COMMUNITY INVOLVEMENT

- 4.1 Prior to the submission of this application, the applicants have consulted with the Local Planning Authority (Camden Council), Historic England, and the local community.
- 4.2 Those consultations have directly influenced the current development proposals.
- 4.3 We provide a summary of the consultations undertaken, the advice received, and how the development proposals have been amended to take on board that advice.

a. Camden Council and Historic England

- 4.4 On 19th June 2015, the applicants submitted a pre-application advice request to Camden Council. Draft proposals comprised the conversion of the entire building into 19 self contained flats. Excerpts of the draft proposals are provided at Appendix 1.
- 4.5 A site visit was undertaken by officers on 30th June 2015; a subsequent meeting was held at the Council's offices attended by Rachel English (Camden Planning Officer), Nick Baxter (Camden Conservation Officer), Carol Little (Camden Building Control Officer), and Claire Brady (Historic England, Inspector of Historic Buildings and Areas).
- 4.6 Written advice was provided by Camden Council on 18 September 2015, a copy is attached at Appendix 2 for reference. Additional detailed advice specific to the physical changes proposed to the listed building was provided by Historic England (09 July 2015), attached at Appendix 3.
- 4.7 Based on the comments provided by officers, revised proposals were submitted to Camden Council/ Historic England on 5th October 2015. Drawing excerpts are provided at Appendix 4. In summary, the following alterations were made;
- The proposed lightwells to the south elevation were reduced in depth, with a more modest stair, tighter to the building line, stepping up to garden level.
 - The proposed replacement oil store was altered to comprise ground and first floors only, with no basement level proposed. The roof was pitched and tiled, accommodating a gable and dormer detail.
 - Parking to the forecourt retained the existing surface treatment. Bays were proposed to be demarcated discretely e.g. demarcation parking studs instead in lieu of new boundary walls. Refuse/recycling and cycle parking was relocated beside the northern boundary wall, in discrete linear enclosures.
 - The area outside the appliance bay was kept open and largely unaltered. The space was proposed to be used for parking, discreetly planned through demarcation studs.
 - The existing garden space at the rear was retained as one open, communal garden for all future residents of the development.
 - Appliance bay and former watch room was amended to accommodate a single residential unit with a bespoke, largely open plan design solution. The main volume of the appliance bay was maintained, with only two insertions sought in the form of pods.

- The former dormitory/ gym at first floor was changed to comprise a single studio flat with mezzanine as suggested. The existing 'greasy' pole access cubicle and associated pole were retained.
 - The first floor terraces/courtyard was amended to provide a single communal space, featuring fixed landscaping to provide privacy between direct facing windows.
- 4.8 A second site visit was undertaken by Ms Claire Brady (Historic England) on 6th October 2015. Her further written comments were provided on 13th October, attached at Appendix 5. In summary, the most pertinent comments provided were;
- **Basement Units 1-4.** The proposals have been amended in accordance with my previous comments. (our underlining)
 - **Ground floor External areas.** The proposals have been amended in accordance with my previous comments. In respect to the new bin and cycle stores, I would recommend that they are kept below the height of the boundary wall in order to minimise their visual impact in views from the street (our underlining). This has been taken on board, see drawing 070.
 - **Ground Floor Unit 8.** This proposal still show works which are considered to cause harm, including the removal of original partitioning and part of the external wall containing a chimney breast. I would therefore recommend further revisions to the proposed plan form of this flat in order to retain as much original layout and fabric as possible. Features such as the flue handles should also be retained, where possible. This has been taken on board, see paragraph 4.12 below
 - **Ground Floor Unit 9 (formerly units 9-11).** The creation of a single unit within the appliance bay space would clearly involve less intervention into the volume and fabric of the space and is a more acceptable solution than the previous proposals to divide into 3 units. The idea of creating bedroom/bathroom pods that mimic the volumes of the original fire engines is an interesting idea and more work should be undertaken showing how these pods would interact with the side walls of the space - ideally they should be set in from the sides. The levelling of the existing flooring was discussed and the possibility of laying new flooring. Since our meeting, I have forwarded a photo to yourselves of a similar fire station that similarly appears to have square tiles with diagonal bands, therefore making it likely that the flooring within Belsize Fire Station is original. In which case, whilst some releveling could be acceptable at the rear of the unit, I would recommend that you seek to retain and reuse as many of these original floor tiles as possible. As discussed, further work would need to be undertaken on this particular part of the building, particularly scheduling existing features such as windows, doors, tack hooks etc, and detailing the impact of the proposals on those features. See paragraph 4.12 below.
 - **First Floor Unit 10.** The proposals have been amended in accordance with my previous comments. Further details are also required in respect to the proposals to open up part of the ceiling to the roof. I also requested the retention of the existing door case and arch leading through to the mess area. (our underlining)
 - **First Floor Unit 11.** The proposals have been amended in accordance with my previous comments. (our underlining)
 - **Terrace Garden.** The proposals have been amended in accordance with my previous comments. (our underlining)

- **Second Floor Units 16-18.** My main concerns with the previous scheme related to the practicalities of using the loft space (particularly Building Regulations) and the imposition of external dormer windows. It is understood that you have received formal advice from your appointed Building Regulations advisors stating that they do not consider it necessary to provide a secondary means of access or escape.
- You have also presented images of your proposed dormers in the context of the southern elevation. In my opinion, these dormer windows do not appear to challenge the architecture of this facade and in my opinion, could be acceptable in heritage terms, providing they are appropriately detailed and constructed (extract of dormer window CGI provided below). (our underlining)



CGI OF PROPOSED DORMERS ON SOUTH ELEVATION

- **Unit 19 (tower).** My concerns regarding the impact of the proposals on the significance of the tower and the internal stairwell remain. As such, much more detail is required. See drawings 007 and 084 and the DAS where further information is provided.
- 4.9 On the basis of the above comments, further revised proposals were presented to Ms Brady on December 10th 2015. Excerpts attached at Appendix 6. In summary, the revised plans concentrated on five apartments, namely proposed apartments 8, 10, 11 and 19, addressing the above concerns, summarised below:

Apartment 8 retained the original panelling and chimney; the ceramic tiled walkway, previously split between different apartments, retained for communal use; the layout of the apartment followed that of the existing rooms.

Apartment 9 (appliance bay) incorporated pods for the bedrooms which were set away from the existing walls so far as possible. Existing details such as the radiators and fire pole were retained in situ. Previously there were three openings in the wall below the windows; this was revised to create just one very small opening.

Apartment 10, the door into the proposed bedroom was revised. The proposed kitchen retained existing walls in situ.

Apartment 11, the proposed mezzanine level was reduced in extent to stand over approximately only half of the room. The existing archway is retained.

Apartment 19, following a meeting with the appointed Building Control officer, a protected route was provided through the flat in the event of a fire.

- 4.10 Written feedback provided by Historic England, dated 17/12/15, attached at Appendix 7, confirmed that the revised flat layouts appeared much better resolved. Further details of the

proposed pods within the original appliance bay and their relationship to the surrounding historic fabric were requested to be submitted as part of the planning application. Further work was sought in respect of flat 5 (ground floor rear) to minimise works proposed to the existing layout and structure in this part of the building.

- 4.11 On 19 January, revised plans/additional information were submitted to English Heritage, particularly in respect of flat 5, and 6 (the appliance bay works, proposed pods etc). Excerpts attached at appendix 8.
- 4.12 Correspondence received from Ms Brady on 25 January 2016 advised that Unit 5 appeared to be much better laid out and now retains all of the original partitioning in this area. Ms Brady also very much welcomed the retention of the corridor space. With regard to Unit 6, the original appliance bay, it was considered that the proposed pod partitioning appeared to be in line with previous advice. Further detail of the finishes to this partitioning, as well as the proposed glazed door screens and any other new finishes, including re-levelling of the floor, was requested as part of the formal application, which is duly provided herewith.

b. Local Community

- 4.13 On Wednesday 16th September, local residents in Lancaster Grove, Lambolle Place and Eton Avenue, together with the Camden History Society, Belsize Resident's Association and Belsize Conservation Area Advisory Committee, were invited to a consultation evening held at Swiss Cottage Community Centre, 19 Winchester Road.
- 4.14 Draft proposals were on display, with the project Planning Consultants (NT+A), Architect (SKA), Heritage Consultant (DLG) and applicant (Vulcan Properties Limited) in attendance to present the proposals.
- 4.15 Approximately 30 persons attended the consultation. Written feedback received from attendees is attached at Appendix 9.
- 4.16 Overall, the feedback received was extremely positive with a number of residents acknowledging that the development appeared modest and sympathetic to the host.
- 4.17 The one main concern raised by residents was that the development should not cause any impact on existing on-street parking stress. We discuss this further at paragraph 7.62 of this report, however, in summary; the proposed development will provide 11 parking spaces on-site, serving 11 of the 12 units proposed. The remaining unit will be secured as a car free unit, where restrictions on obtaining an on-street parking permit will be secured by legal agreement. Any visitors to the premises will need to make use of locally designated pay and display bays.

5.0 THE PROPOSED DEVELOPMENT

a. Initial Remarks

- 5.1 Notwithstanding the detailed pre-application advice received from the Local Planning Authority and Historic England set out in the preceding chapter of this report, parts of the existing building remain subject to occupation and/or tenancy restrictions which mean that no works can be undertaken within those areas at this time.
- 5.2 The areas in question comprise existing flats at first and second floors in the east wing, and the dormitories in the south west corner of the first floor. The areas in questions are left white/blank on drawings 004 and 005 – extracts below, and accordingly do not form part of the development proposals at this stage. The applicants expect to return with a subsequent application for these areas in due course.



GF



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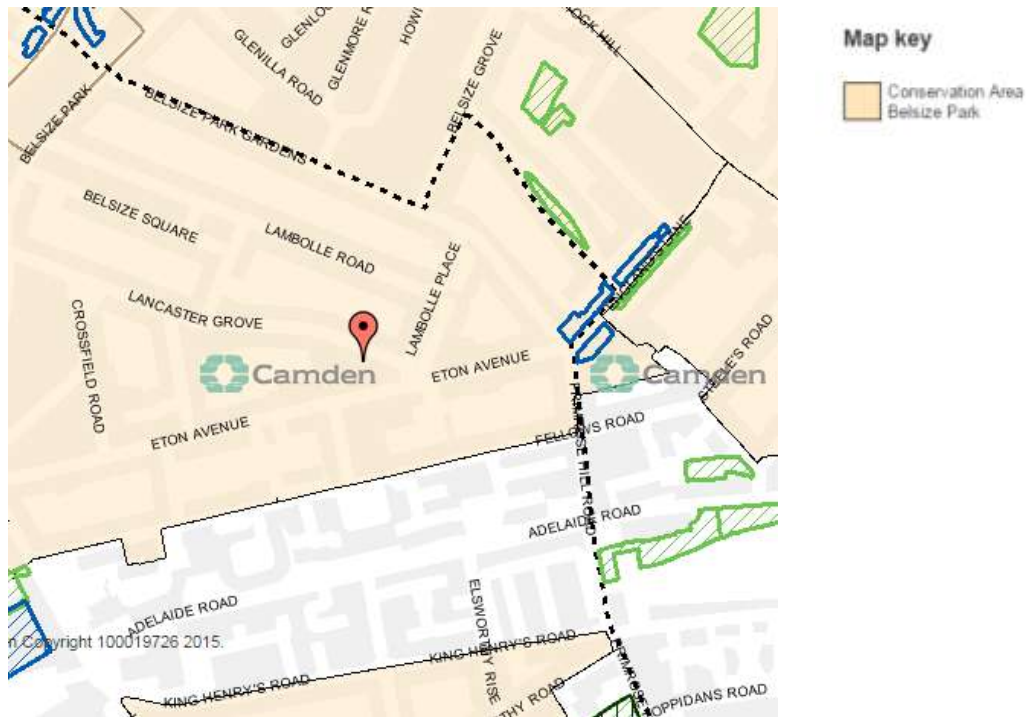
--- AREAS NOT FORMING PART OF THE DEVELOPMENT PROPOSALS

b. The Application Proposals

- 5.3 This Planning and Listed building application seeks consent to convert and extend the building to provide 12 self contained flats (Use Class C3), comprising 8 x 1b flats, 3 x 2 bed flats and 1 x 3 bed flat.
- 5.4 Please refer to the **Design and Access Statement** submitted herewith, which provides a detailed description of the development sought.
- 5.5 In summary the planning application proposes the following;
1. The change of use of the former fire station via conversion into apartment accommodation.
 2. Demolition of existing single storey fuel store followed by provision of a new east wing with a single unit of accommodation.
 3. Provision of limited, west, single storey extensions.
 4. Provision of new residential accommodation within the existing main roof spaces.
 5. Sensitive and bespoke provision of residential accommodation within the previous appliance hall
 6. Provision of residential accommodation within the former fire station recreation space
 7. Provision of thirteen new dormer windows to facilitate the loft conversion.
 8. Conversion of the tower into residential accommodation.
 9. Provision of new lift within existing main core.
 10. Demarcation of 11 parking spaces
 11. Creation of bin stores within north courtyard
 12. Provision of covered cycle store within north courtyard
 13. Removal of internal walls to facilitate the creation of apartment accommodation.
 14. Various detailed internal alterations, extension and repair work comprising conversion.
 15. Alterations to existing ground floor fenestration on south elevation
 16. Conversion of first floor external courtyard and rooflight into a communal outdoor space

6.0 RELEVANT PLANNING FRAMEWORK

- 6.1 The relevant planning framework comprises the National Planning Policy Framework (NPPF, adopted May 2012), National Planning Policy Guidance (NPPG) and Mayor’s London Plan (FALP 2015).
- 6.2 Camden Council has also adopted a number of planning documents that form the *Development Plan* for Camden comprising, the Core Strategy (adopted November 2010), Development Policies (November 2010), Camden Planning Guidance (CPG 1, 2, 3, 4, 6, 7 and 8) and the Policies Map.
- 6.3 The latter confirms that the site falls within the Belsize Park Conservation Area.



POLICIES MAP EXTRACT

- 6.4 More specifically, the following planning policies are considered to be of direct relevance;

LDF Core Strategy

- CS1 Distribution of growth
- CS3 Other highly assessable areas
- CS5 Managing the impact of growth and development
- 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
- CS15 Protecting and Improving our Parks and Open Spaces & encouraging Biodiversity
- CS16 Improving Camden’s health and well-being
- CS18 Dealing with waste and encouraging recycling
- CS19 Delivering and monitoring the Core Strategy

LDF Development Policies

DP2 Making full use of Camden's capacity for housing
 DP3 Contributions to the supply of Affordable Housing
 DP5 Homes of different sizes
 DP6 Lifetimes Homes and Wheelchair Housing
 DP13 Employment premises and sites
 DP15 Community and Leisure Uses
 DP16 The transport implications of development
 DP17 Walking, Cycling and public transport
 DP18 Parking standards and limiting the availability of car parking
 DP19 Managing the impact of parking
 DP20 Movement of Goods and Materials
 DP21 Development Connecting to the Highway Network
 DP22 Promoting Sustainable Design and Construction
 DP23 Water
 DP24 Securing High Quality Design
 DP25 Conserving Camden's Heritage
 DP26 Managing the impact of development on occupiers and neighbours
 DP27 Basements and Lightwells
 DP28 Noise and Vibration
 DP31 Provision of, and improvements to, open space and outdoor sport and recreation facilities
 DP32 Air quality and Camden's Clear Zone

Updated Camden Planning Guidance (CPG)

CPG1 – Design 2015
 CPG2 – Housing 2015
 CPG3 – Sustainability 2015
 CPG4 – Basements 2015
 CPG5 – Town Centres, Retail and Employment 2015
 CPG6 – Amenity 2011
 CPG7 – Transport 2011
 CPG8 – Planning Obligations 2015
 Belsize Conservation Area Statement 2003

Planning Considerations

6.5 The following matters are considered to be material planning considerations:

- Land use,
- Provision of housing,
- Design;
- Trees and biodiversity
- Amenity;
- Transport;
- Sustainability;
- CIL;
- S106 contributions.

7.0 PLANNING ASSESSMENT

a. Land Use

- 7.1 In accordance with the Town and Country Planning (Use Classes) Order 1987 (as amended), a fire station is *Sui Generis*. Accordingly, any material change of use of the building to an alternative use would require prior planning permission.
- 7.2 With regard to the proposed change to residential use, Camden's pre-application advice confirms that *"there is no policy which specifically protects this [fire station] type of use. It is recognised that the fire station use is no longer viable on the site"*.
- 7.3 Notwithstanding this, the supporting text to policy 3.16 of the London Plan confirms that fire stations constitute 'social infrastructure'. Policy 3.16 states that;
- "Proposals which would result in the loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered"*
- 7.4 The policy goes on to say, *"the loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services"*.
- 7.5 At local level, the policy is reinforced by Camden Core Strategy (2010) Policy 10 'Supporting Community Facilities and Services' and DP15(c).
- 7.6 It should be recognised that the closure of the fire station, which took place over two years ago (January 2014) formed part of the Fifth London Safety Plan (LSP5) which was prepared in 2013, and which identified that its closure would not affect the ability of the Fire Service to meet its attendance targets, with essential services being relocated to other nearby stations.
- 7.7 It should be further noted that LSP5 was the subject of significant public consultation. The recommendations of LSP5 have been implemented, including the closure of 10 fire stations across Greater London, and the application site was sold to the applicant last year.
- 7.8 Based on the above, a defined need for a fire station in this location no longer exists. The fire service continues to meet the needs of the local Belsize Park population through West Hampstead and Kentish Town Fire Stations, which are retained by LFB.
- 7.9 The restructure of the fire service and the closure of the Belsize Park Fire Station forms part of an agreed programme of social infrastructure re-provision, ensuring continued delivery of the fire service which ensures that *replacement facilities* are in place to continue to meet the needs of the local population in accordance with Camden Policy DP15(c), CS10 and London Plan 3.16.
- 7.10 With regard to the suitability of the redundant premises for other forms of social infrastructure, for which there is a defined need in the locality, this has been considered.
- 7.11 In early summer 2014, the property, along with the other fire stations closed by LFB, were taken to open market, with bids in mid-summer 2014. We provide a copy of the marketing brochure at Appendix 10.

- 7.12 We are advised by LFB's agents, Dron & Wright, that the property was brought to market in late March/early April 2014, marketed for 8 months with advertisements in the Estates Gazette and Property Week.
- 7.13 As a result of the initial marketing process, Dron & Wright received three unconditional offers for the property, along with fifteen portfolio bids, which included the other 9 fire stations brought to the market in July 2014.
- 7.14 LFB advised that their preference was to sell the property on an individual basis, six bids were received in September 2014. Heads of terms were agreed with Vulcan Properties early last year.
- 7.15 We are advised that all of the above interest in the property came from developers looking to convert the premises into residential use. The 1 exception came from the Education Funding Agency in early 2014. Their bid was unsuccessful due to an LFB obligation to achieve best value from the sale of the site. More generally in this regard, policy DP15 states that new community facilities, including a school, must be provided in buildings which are flexible and sited to maximise the shared use of premises. Moreover, we understand from the headmistress at Sarum School opposite, that there are already significant traffic pressures on the local area at peak time associated with the existing school, adding a further would exacerbate this issue.
- 7.16 The former fire station is not considered suitable nor flexible for community use for a number of reasons, including its listed status. The former fire station is a grade II* listed building. Any alterations require prior listed building consent. Community uses, such as schools, are required to meet numerous standards which will have a material impact on the interior and exterior of the listed building, including mobility/ disabled access. The building is not accessible to mobility impaired persons, particularly wheelchair users. Few of the thresholds into the building are level. Moreover, once in the building, there are level changes across the site. Modifying the building to be accessible would be almost impossible; any attempt to do so would have significant implications for the building.
- 7.17 A significant part of the building, namely the residential wing and generally the upper floors were, and in some cases, continue in use as living accommodation. It would be wholly appropriate to convert the remaining parts of the building into a consolidated residential use, in what is a predominantly residential and suburban setting.

- **Appropriate Alternative/ Future Use**

- 7.18 In support of the above, and principle of establishing additional residential use at the site, the applicants have had regard to 'London Historic Fire Stations' a guidance document jointly produced by English Heritage (now Historic England) and London Fire Brigade.
- 7.19 The document provides guidance on the appropriate future use of London's Fire Station's, including Belsize Park. The guidance is intended to aid local authorities in the assessment of applications for alterations to historic fire stations. At section 7, the guidance provides advice for converting de-commissioned fire stations.



- 7.20 The guidance advises that local authorities should seek to preserve the significant qualities of former stations when handling applications relating to converted stations. In particular, the guidance asks;
- a. Can a suitable new use be found that will keep the applicant bay and yard as open spaces?
 - b. Can appliance doors be retained with modern glazing behind them?
 - c. Presumption should be in favour of retaining internal detailing and materials unless good justification for its loss can be demonstrated
 - d. Upper floors were usually designed as residential flats, and the best use for a historic building will often be that for which it is originally designed. Can upper floors be put back into residential use? Reused flats should respect original details such as plan form, fireplaces, internal doors etc.
 - e. Can the former residential entrance be reused for the upper floors?
 - f. Whilst historic alterations can be of value, some may be modern alterations that detract from the special interest of the building. Can these be 'unpicked' to reinstate some special interest?
 - g. Can flexibility be applied to the mix of residential units given the importance of retaining plan form and working within the framework of the historic building?
 - h. Watch towers will require attention. Is it possible or practicable to retain it as an accessible feature? Bear in mind that it will require maintenance, and if the building is in residential use, that a service charge may need to be signed up to by residents to upkeep the building.
 - i. Roof profiles of fire stations. It will be unlikely that adding additional storeys to the roof will be acceptable.
- 7.21 In response, the proposed development seeks to secure the following:
- a. The yards are proposed to be kept as open spaces. The former appliance bay is also proposed to be retained as a largely open space, with a bespoke conversion.
 - b. The appliance doors are to be retained with modern glazing behind them.
 - c. There is a presumption in favour of retaining internal detailing and materials. See Design and Access and Heritage Statements for further information.
 - d. Upper floors were designed as residential flats and are proposed to be maintained as such. The proposed conversion seeks to respect the original details such as plan form.
 - e. The former residential entrances are to be reused for the upper floors
 - f. There have been few historic alterations. Where evident, these are proposed to be 'unpicked' to reinstate special interest. For example, the walkway at first floor level is covered with a low grade roof and modern supports to provide shelter during inclement weather. It is proposed to replace this with a more sympathetic structural glass and new rationalised supports.

- g. The applicants have sought to provide a mix of residential units. As acknowledged by the guidance the importance of retaining plan form and working within the existing structure of the heritage asset has driven the units mix. Accordingly, the mix is limited to 1 and 2 beds units, with some units falling short of minimum space standards set out by the Mayor and Camden Planning Guidance.
 - h. The watch tower has been considered, particularly given the requirement to ensure its on-going maintenance. Accordingly, the applicants have sought to make use of the tower and convert its four floors to a self contained 1 bed flat.
 - i. The roof voids within the building, previously serving a storage function, provide generous spaces that simply require natural light to make them useable and attractive living spaces. The architects propose the sensitive addition of dormer windows in keeping with existing dormers on the building and in the surrounding context, so not to detrimentally harm the character and appearance of the building or conservation area context.
- 7.22 Please refer to section C below, where further detailed consideration is given the proposed conversion of the building, design, and heritage assessment.

b. Provision of Housing

- 7.23 Housing is a priority land use of the LDF and the principle of providing residential units at the site should be considered acceptable. More particularly, Development Policy DP2 confirms that the Council will seek to maximise opportunities to supply new housing; housing is regarded as *the* priority land-use of the Local Development Framework, and the Council makes housing its top priority when considering the future of unused and underused land and buildings (Core Policy CS6).
- 7.24 The proposed development seeks to provide 12 self contained flats and therefore complies with the aspirations of policy DP2 (and CS6).

- Dwelling Mix

- 7.25 In terms of mix, Policy DP5 advises that the Council will seek all residential developments to meet priorities set out in the Dwelling Size Priorities Table, including conversion schemes. We provide the relevant extract from the table below.

| | 1 bed/Studio | 2 bed | 3 bed | 4 bed or more | Aim |
|--------------|--------------|-----------|--------|---------------|-----------|
| Market Units | Lower | Very High | Medium | Medium | 40% 2 bed |

- 7.26 The table confirms that the highest priority need is for 2 bed units, with a medium need for 3 and 4+ bed units, and a lesser need for 1 beds.
- 7.27 The proposed mix comprises 8 x 1 beds, 3 x 2 beds and 1 x 3, which does not meet policy expectations. This departure has been governed by the existing form and layout of the building; given its grade II* listed status, the proposals have sought to make minimal alterations to the buildings structure. This is supported by Historic England’s pre-application advice (see appendix 3) and LFB’s historic fire stations guidance referred to above.
- 7.28 Notwithstanding this, the proposed development does provide a good mix of units, comprising 1 beds, 2 bed and 3 bed units.

- Affordable Housing

- 7.29 Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. DP3 introduces a sliding scale for development between 10 units and 50 units.
- 7.30 The 50% target will operate on a sliding scale for housing development, subject to the financial viability of the development, with a norm of 10% for 1,000m² (gross) of additional housing and 50% for 5,000m² (gross) of additional housing, considered to be sites with capacity for 10 dwellings and 50 dwellings respectively.
- 7.31 The Policy normally seeks that the affordable requirement is met on site. Where provision cannot practically be made on site, the Council will accept contributions in the form of payment-in-lieu (paragraph 2.120 of CPG3). Where it is accepted that affordable housing cannot be practically achieved on site and that no alternative site is available in the area, an off-site contribution can be secured. In this case, it is prudent to submit a viability appraisal.
- 7.32 The proposed development of 12 units is therefore expected to contribute 12% of the units as affordable housing, equivalent to 1.44 units.
- 7.33 Given the listed status of the building and the requirement to provide only 1.44 units (essentially 1 unit on site) Neil Cleary (Camden Housing Officer) advised that the applicants make contact with Newlon Housing Trust, and Origin Housing Ltd, both on the Council's preferred providers list, to confirm whether or not there would be an interest in this regard.
- 7.34 We attach at Appendix 11, correspondence received from both Newlon and Origin which confirm that they could not justify the set up costs/management required at the site. Furthermore, the grade II* listed nature of the building, with associated service and other costs associated would prevail against provision of affordable homes at the site.
- 7.35 It is also confirmed that the applicants do not have any other property holdings within the borough where affordable housing could reasonably be provided as an alternative.
- 7.36 Accordingly, an off-site contribution towards affordable housing should be considered acceptable.
- 7.37 Based on the scheme of 12 units (12%, equivalent to 1.44 units), and utilising the formula provided within CPG3, the off-site contribution is;
- Proposed built floorspace = 1,056sqm (as per attached latest SKA schedule)
 1,056 x 12% = 126.72sqm
 Payment-in lieu of affordable housing = 126.72sqm x £2,650 (Camden Standard Multiplier) = £335,808.
- 7.38 An off-site affordable housing payment of £335,808 will be provided, and secured by way of legal agreement.

- Lifetime Homes and Wheelchair Housing

- 7.39 From 1st October 2015, LPA's cannot longer apply Lifetime Homes.
- 7.40 10% of the homes should either meet wheelchair housing standards or be easily adaptable to meet the standards. Unit 6, at ground floor level, can be easily adapted to provide wheelchair access.

- Residential Development Standards

- 7.41 In accordance with Camden Planning Guidance 2 (2015) the overall internal floorspace in new self-contained dwellings should normally meet or exceed the minimum standards set out in the table in paragraph 4.14.
- 7.42 All 12 flats have been designed to comply with the minimum internal space standards.
- 7.43 A BRE assessment is submitted as part of this application. The assessment has reviewed all habitable rooms to ensure that they have appropriate access to natural light.

- Amenity Space

- 7.44 Paragraph 4.29 of Camden Planning Guidance 2 (Housing) 2015 require all new dwellings to be provided with some access to private amenity space. However, in this particular circumstance, due to the listed nature of the building, it is accepted by officers that the host building could not practicably provide balconies or roof terraces without causing significant and undue harm.
- 7.45 Accordingly, the proposed development makes use of the extensive, open and landscaped grounds along the southern side of the site, to provide a communal garden for future residents. The communal garden will provide in excess of 200m² outdoor useable space.

c. Design and Heritage

- 7.46 Camden Core Strategy Policy CS14 states that the Council will seek to preserve and enhance Camden's heritage assets and their setting. This is supported by Policy DP25 in Camden's Development Policies which states that 'to preserve or enhance the borough's listed buildings, the Council will prevent the total or substantial demolition of a listed building; only grant consent for a change of use or alteration and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and, not permit development that it considers would cause harm to the setting of a listed building. These policies are supported by Camden Policy Guidance (CPG1, September 2014) and the Belsize Conservation Area appraisal.
- 7.47 Historic England has also produced a relevant guidance document titled 'London's Historic Fire Stations'.
- 7.48 The applicants have consulted closely with Historic England (HE) prior to the submission of this application – which is set out in detail in section 4 of this report.
- 7.49 The merits of the proposed works and their impact on the heritage asset are discussed in greater detail in the Design and Access Statement prepared by Shaun Knight Architects, together with the Heritage Statement/ Statement of Significance prepared by DLG Architects, submitted herewith. In summary;
- 7.50 The proposals have been considered in the context of the designated heritage asset itself and its setting in the Belsize Conservation Area. The requirement of the 1990 Planning (Listed Buildings and Conservation Area) Act to pay special attention to the significance of the designated heritage assets has been taken into account.
- 7.51 Great weight has been given to the building's conservation. It had become redundant for its original use but much of the building is already in residential use and is thus not part of this application for a change of use. Where there is a change of use the detail of how this is achieved has been carefully considered to preserve both the form of the building and much of the historic detail. It is believed that this has not caused harm but if it had caused less than substantial harm

- then in accordance with clause 134 this would be weighed against the public benefit of securing an optimum viable use which is consistent with the residential setting of the area.
- 7.52 The significance of the asset has been assessed in accordance with the London Plan Policy 7.8 and is conserved by the proposals being sympathetic to the form, scale materials and architectural detail.
- 7.53 Similar consideration has been given to the Camden Local Plan Core Policy CS14 and Camden Planning Guidance 1 Design with the objective of preserving and where appropriate enhancing the building and the conservation area while alterations have taken account of the character and design of the property and surroundings.
- 7.54 The Belsize Conservation Area has been considered. Sub area 3 is described as having predominantly Victorian Housing. It is recognised that the fire station was designed to fit into that environment and had a domestic character compatible with the large houses in the area. It is considered that the limited external alterations continue that theme and enhance the appearance of the building and character of the conservation area. The external spaces which provide the setting for the building also retain their historic form with paved forecourts to the north and garden setting along Eton Avenue.
- 7.55 It is concluded that the proposals comply with both national and local conservation legislation and guidance and conserve the building and the conservation area in accordance with their significance.

d. Trees and Biodiversity

- 7.56 Policy CS15 states that the Council will require development to protect existing trees and promote provision of new trees and vegetation and encourage biodiversity.

- Trees

- 7.57 An arboricultural impact assessment, prepared by Challice Consulting, is submitted as part of the application. The site accommodates approximately 9 trees of mixed species, within the garden along the southern side of the building. Immediately outside of the site are further trees accommodated along the street in Eton Avenue and Lancaster Grove, and within the neighbouring garden at 34/ 34a Lancaster Grove, comprising a variety of Common Lime, London Plane, Hornbeam, Symcamore and Laurels.
- 7.58 The arboricultural impact of the proposed scheme is minor as no trees are to be removed and minimal pruning is required to enable construction works to be completed.

- Biodiversity

- 7.59 Any new development is required to incorporate biodiversity enhancing measures such as biodiverse roofs, green walls etc in line with planning policy and guidance.
- 7.60 Due to the listed nature of the existing, many of these measures would be inappropriate, however it is the applicants intention to provide bat/bird boxes within the new building elements in order to make a positive contribution.

e. Neighbouring Amenity

- 7.61 Policy DP26 states that development should protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust and microclimate.
- 7.62 The closest neighbouring residential units are located at 22 Eton Avenue and 34 Lancaster Grove. External changes are very limited. The proposed side extension adjacent to these neighbours is single storey only and would be no higher than the existing fence, therefore the impact on those dwellings would be negligible.

f. Transport

- Car Parking

- 7.63 Under Policy DP18, the Council will expect development to be car free in areas within Controlled Parking Zones and easily accessible by public transport.
- 7.64 The PTAL of the site is 2-3, which is poor to average. Accordingly, it is considered that the proposed development can reasonably justify the provision of some parking.
- 7.65 It is proposed to utilise existing parking areas/ hardstanding at the site to accommodate parking for residents. In total it is proposed to accommodate 11 parking spaces on site, accessed via Lancaster Grove. Turning movement diagrams were requested by officers pre-application to demonstrate that cars could access each space in the car park efficiently and safely. We provide the requested movement diagrams as part of the planning application (see drawings 21226 SK01 – SK11 prepared by PTP).
- 7.66 The 11 spaces will be allocated to 11 units within the scheme. Electric charging points can be provided within the site in accordance with DP18 and the London Plan, if required.
- 7.67 The remaining 1 unit, likely to be unit 3, 4, 11 or 12, given that they are the smaller, 1 bed units, will be secured as car free. This is compliant with the Council's parking standards, as set out in Appendix 2 to Camden Development Policies 2010. In this regard, the site is located in the Belsize controlled parking zone which according to Camden records suffers from parking stress (110 permits issued for every 100 spaces). Accordingly, with the exception of the spaces provided on site, the entire development will be car capped and this is proposed to be secured as a section 106 planning obligation. It would mean that residents would not be able to obtain residents parking permits for the Belsize controlled parking zone from the Council.
- 7.68 The site adjoins 2 City Car Club bays, located on Lambolle Place, at the junction of Eton Avenue/Lancaster Grove, to the immediate east of the application site. Future residents of the development would be able to join the car club scheme if they wanted to.

- Cycle Parking

- 7.69 The developments meets the Council's standards for cycle parking, comprising at least 1 space per 1 bed unit and 2 spaces for 2+ bed units, in accordance with CPG2 and the London Plan (FALP 2015). A minimum of 16 spaces would be required, 22 covered and secure cycle stands are provided in a linear storage area set behind the existing northern boundary wall of the site. – see drawing number 002.

- Construction Management Plan (CMP) - draft
- 7.70 Policy DP21 seeks to protect the safety and operation for the highway network. For some developments this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via S106.
- 7.71 Given that the site is located in the Belsize Conservation Area and the proposals would create in excess of 10 residential units, Camden officers have requested that a draft Construction Management Plan be submitted at planning/validation stage. A draft Construction Management Plan is submitted as part of the application documentation.
- Deliveries and Servicing
- 7.72 The principal access to the site is from Lancaster Grove. Deliveries and servicing will be taken on street adjacent to the public highway.
- Highway Works
- 7.73 It is acknowledged that Camden Council may be required to undertake some highway works on completion of the proposed development, e.g. repaving of footway on Lancaster Grove, for which an appropriate financial contribution would need to be secured as a section 106 planning obligation. The applicants confirm that this is acceptable in principle, subject to further discussion regarding the amount of the contribution sought.
- g. Energy, Sustainability and Drainage**
- 7.74 All new development is expected to incorporate sustainable development principles into its design and implementation in line with policies CS13 (Tackling climate change and promoting higher environmental standards) and policy DP22 (Promoting sustainable design and construction). Developments should follow the London Mayor's Energy Hierarchy (namely 1. use less energy, 2. supply energy efficiently and 3. use renewable energy) to show that renewable energy is not just an 'add-on'.
- 7.75 Developments involving 5 or more dwellings and/or 500sq m (gross internal) floorspace or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy.
- 7.76 The creation of 5 or more dwellings from an existing building will need to be designed in line with BREEAM Refurbishment criteria and will be expected to achieve minimum of 60% of the un-weighted credits in the Energy category and an overall 'excellent' rating.
- 7.77 Energy and Sustainability Reports, prepared by XC02, are submitted as part of this application. In summary;
- Energy
- 7.78 In line with the London Plan's three step energy hierarchy, the regulated CO2 emission savings for this development will exceed 35% when energy efficiency measures are taken into account.
- 7.79 The development will incorporate a range of energy efficiency measures including the provision of a new and high efficiency space heating and hot water system, electrical rewiring to include provision of low energy lighting throughout the scheme, and insulation levels meeting Part L1B targets for the any new thermal elements. The improvements in the building systems and fabric

- have reduced regulated CO2 emissions by 41.4% in comparison to the existing building, thus exceeding the requirements outlined by Camden Council and London Plan 2015.
- 7.80 No district heating network currently exists within close proximity of the site. Due to the nature of the development, a CHP unit would not be an economically viable option. Hence, high efficiency boilers will be installed to provide space heating and hot water to each apartment.
- 7.81 Due to the conservation requirements of the existing Grade II listed building, it will not be feasible to install renewable technologies without considerable construction and alterations to the building.
- 7.82 In total, the development is expected to reduce regulated CO2 emissions by 41.4% when compared to the existing baseline building. This meets the London Plan CO2 reduction target of 35% set out for all major developments.
- Sustainability
- 7.83 A BREEAM Domestic Refurbishment pre-assessment has been carried out for the proposed development. The development achieves a total of 55.91 credits, which falls short of meeting BREEAM 'Excellent' and 60% of the unweighted credits in the Energy Category for the various reasons outlined in the previous section. This shortfall is largely due to the listed nature of the building, and the restrictions in available credits through items such as on-site renewable technologies etc.
- 7.84 Every effort was made by the client's project team in adopting a range of sustainability measures over the life-cycle of the development, and that at least 60% of the water credits and 40% of the material credits are met, which is in line with Camden's policy.
- Drainage
- 7.85 In accordance with local policy DP23, any development should seek to limit the amount of run-off and waste water entering the combined storm water and sewer network, typically achieved by a sustainable urban drainage system.
- 7.86 The site lies in Flood Zone 1 and lies on impermeable London Clay. The Council's SUDS proforma require the London Plan drainage hierarchy to be considered and the applicants have to come up with the best option based on:
- Store rainwater for later use such as rainwater harvesting but it's a building of multiple occupation and the demand is usually high for the small roof area and such tanks can only provide a few days supply and these are not practical if full. Green roofs also fall into this category but it's seldom easy to retrofit onto an existing building, particularly if the roof is pitched, and particularly if it is listed.
 - Infiltration techniques, such as permeable pavement, soakaways, infiltration trenches, but the site is on London Clay so this is not an option.
 - Attenuate rainwater in ponds or open water features for gradual release to a watercourse. Not practical on this small urban site and there are no watercourses.
 - Attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse. No watercourse nearby
 - Discharge rainwater direct to a watercourse - none nearby

- 7.87 Paragraph 080 of the NPPG indicates that SUDS should be used unless there are practical reasons for not doing so such as local ground conditions or the density of a development. In addition, it is not usual to provide SUDS for the change of use of an existing building, particularly where the building is listed and minimum alterations are sought.
- 7.88 As the proposed development comprises a change of use of an existing building and the site sits on London Clay with no watercourse nearby, and having reviewed the options, there are considered to be no suitable SUDS options that can be used other than a storm cell on the existing drainage outlet.
- 7.89 We submit herewith a copy of the Council's completed surface water drainage proforma.

h. CIL

- 7.90 It is acknowledged that the development would be subject to the Mayor of London's CIL and Camden CIL. A completed CIL form is submitted as part of the application which sets out the assumed liability from this development.

i. Possible S106 Contributions

- 7.91 It has been confirmed that this development would be liable to make a contribution towards affordable housing provision. Please refer to paragraph 7.28 above, where it is confirmed that the site commits to making an off-site financial contribution of £335,808 in lieu of on-site provision.
- 7.92 Additional contributions that may be sought are as follows. Further advice is awaited from Camden officers in this regard.
- Environmental improvements / public realm contribution
 - Highways contribution

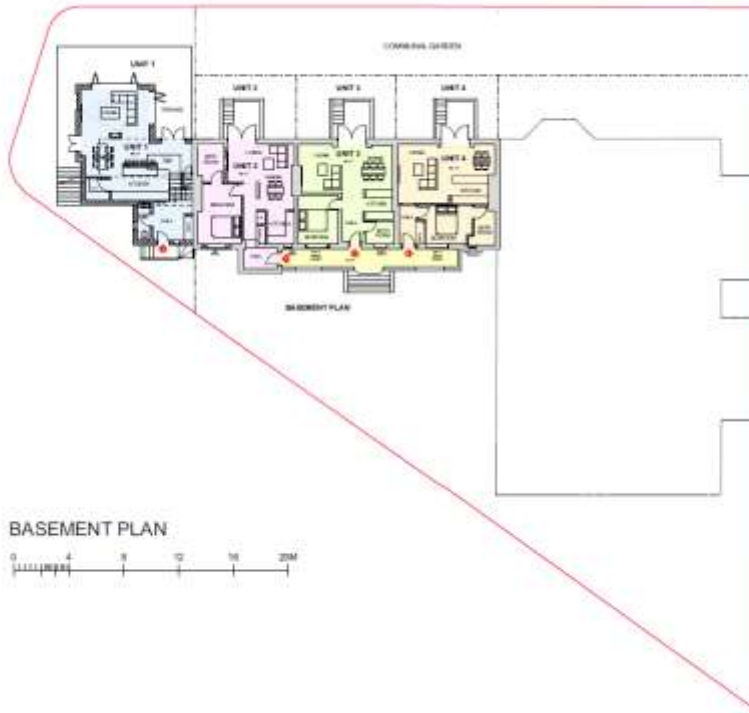
8.0 SUMMARY AND CONCLUSIONS

- 8.1 This statement has been prepared on behalf of Vulcan Properties Limited.
- 8.2 The former fire station was closed on 9th January 2014 following the implementation of the London Fire and Emergency Planning Authority's latest London Safety Plan (LSP5, 2013-2016).
- 8.3 LSP5 sets out how the Authority would reduce implement necessary savings of £29m over the next few years, whilst maintaining the safety of Londoners through an efficient and effective service.
- 8.4 Part of the costs saving measures including closing 9 stations, including Belsize Park. These buildings were considered to be the least well located, least efficient, expensive to maintain (given the majority are listed and ageing structures) and providing the poorest facilities for staff.
- 8.5 The fire service continues to meet the needs of the local Belsize Park population through West Hampstead and Kentish Town Fire Stations which are retained by LFB. The restructure of the fire service therefore ensures that replacement facilities are in place to continue to meet the needs of the local population in accordance with Policy DP15c. The loss of the facility to another use is therefore acceptable in land use terms.
- 8.6 The proposed development seeks to convert and extend the building to create 12 self contained flats. Careful consideration has been given from the outset to the historic interest and significance of the building and it is considered that these proposals retain and preserve the building while providing positive public benefits in the form of appropriate housing, complying with NPPF paragraph 134, and recognising the benefits of a viable use.
- 8.7 The proposed conversion of the redundant fire station to residential use is in accordance with the joint guidance prepared by English Heritage and LFB in respect, London's Historic Fire Stations, March 2010. Moreover, the proposed use accords with Camden Development Policy DP2 which seeks seek to maximise opportunities to supply new housing; housing is regarded as the priority land-use of the Local Development Framework, and the Council make housing its top priority when considering the future of unused and underused land and building.
- 8.8 An appropriate contribution towards the provision of affordable housing off-site is provided.
- 8.9 The proposed development seeks to provide predominantly 1 bed flats due to the fabric first approach has been taken given the listed status of the building. All flats have been designed to meet minimum housing standards where possible. Communal amenity spaces are provided.
- 8.10 The site lies has a poor/average PTAL. On-site parking provision can therefore be justified in accordance with Policy DP18. 11 on-site parking spaces are provided, 1 flat will be secured as car free.
- 8.11 The proposals have been designed to ensure that neighbouring amenity is not adversely harmed, particularly through potential loss of privacy of overlooking.
- 8.12 It is concluded that the proposals comply with both national and local conservation legislation and guidance and conserve the building and the conservation area in accordance with their significance.

APPENDICES

APPENDIX ONE

PRE-APP SUBMISSION 19/06/15 - DRAWING EXTRACTS



BASEMENT PLAN
0 4 8 12 16 20M

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| PROJECT: 36 LANCASTER GROVE |
| TITLE: BASEMENT PLAN |
| Date: 09/03/20 |
| Scale: 1:100 A3/A4 Sheet: 001 |
| DRAWING NUMBER: 001 |



GROUND FLOOR PLAN
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| Date: 09/03/20 |
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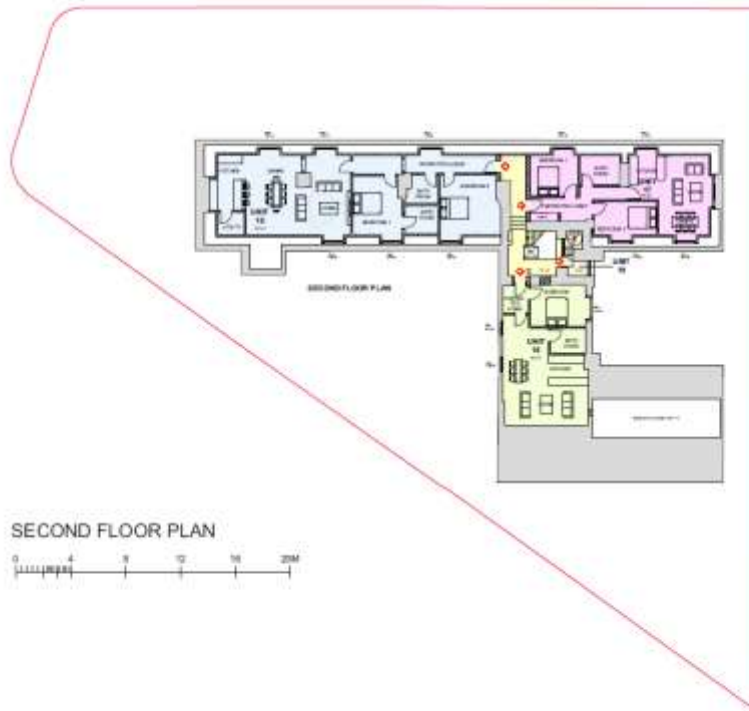
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| PROJECT: 36 LANCASTER GROVE |
| TITLE: FIRST FLOOR PLAN |
| Date: 09/06/2019 |
| Scale: 1:100 (A1) 10mm/100 |
| DRAWING NUMBER: 000 |



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| PROJECT: 36 LANCASTER GROVE |
| TITLE: SECOND FLOOR PLAN |
| Date: 09/06/2019 |
| Scale: 1:100 (A1) 10mm/100 |
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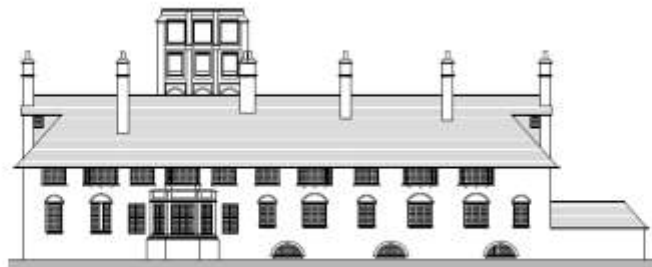
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| TITLE | 3RD, 4TH, 5TH FLOOR PLANS |
| DATE | JUNE 2015 |
| SCALE | 1:50 (A1) 1:100 (A0) |
| DRAWING NUMBER | 007 |

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PROPOSED SOUTH ELEVATION

FOR PRE-APP
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EXISTING SOUTH ELEVATION

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| | |
|----------------|--|
| PROJECT | 36 LANCASTER GROVE |
| TITLE | EXISTING AND PROPOSED SOUTH ELEVATIONS |
| DATE | JUNE 2015 |
| SCALE | 1:50 (A1) 1:100 (A0) |
| DRAWING NUMBER | 007 |



APPENDIX TWO

CAMDEN PRE-APPLICATION ADVICE REPORT (18/09/15)



Date: 18/09/2015
Our ref: 2015/3546/PRE
Contact: Rachel English
Direct line: 020 7974 1343
Email: rachel.english@camden.gov.uk

Mandip Sahota
Nicholas Taylor & Associates
31 Windmill Street
London
W1T 2JN

**Development Management
Regeneration and Planning**

London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8EQ

Tel: 020 7974 1343
planning@camden.gov.uk
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Dear Mandip,

**Town and Country Planning Act 1990 (as amended)
Re: Belsize Fire Station, 36 Lancaster Grove, London NW3 4PB**

Thank you for your enquiry received on 19th June 2015, our site visit on 30th June and subsequent meeting at our offices regarding your proposals for the conversion of the former Fire Station into 19 residential units.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

During the course of the pre-application process you have submitted revised drawings in response to concerns raised from Council planning officers and comments from Historic England. The following advice refers to the revised drawings received on 24th August 2015.

Please be advised that any further planning submission at pre-application or application stage would require much more detailed drawings than those submitted, particularly with the existing drawings which do not indicate the use or historic detailing of each room.

Site Description

The proposal relates to a detached Grade II* listed former fire station dated 1912-15. The site is located on the corner of Eton Avenue and Lancaster Grove. The building is located in the Belsize Conservation Area and described in the Belsize Conservation Area Statement as "an impressive Arts and Crafts building, with steep hipped roofs and intricate brick detailing, which forms a

local landmark and focus at the junction of Eton Avenue and Lancaster Grove".

The site is currently vacant following departure of the London Fire Brigade in January 2014. The previous use was as a three appliance bay fire station with ancillary residential accommodation in the form of residential flats and dormitories. The building is arranged over ground, basement and first floors with a practice tower. Following our site visit it appeared that one or two of the residential units are still in use and was not available for view.

Relevant Policies

LDF Core Strategy

CS1 Distribution of growth
 CS3 Other highly assessable areas
 CS5 Managing the impact of growth and development
 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
 CS15 Protecting and Improving our Parks and Open Spaces & encouraging Biodiversity
 CS16 Improving Camden's health and well-being
 CS18 Dealing with waste and encouraging recycling
 CS19 Delivering and monitoring the Core Strategy

LDF Development Policies

DP2 Making full use of Camden's capacity for housing
 DP3 Contributions to the supply of Affordable Housing
 DP5 Homes of different sizes
 DP6 Lifetimes Homes and Wheelchair Housing
 DP13 Employment premises and sites
 DP15 Community and Leisure Uses
 DP16 The transport implications of development
 DP17 Walking, Cycling and public transport
 DP18 Parking standards and limiting the availability of car parking
 DP19 Managing the impact of parking
 DP20 Movement of Goods and Materials
 DP21 Development Connecting to the Highway Network
 DP22 Promoting Sustainable Design and Construction
 DP23 Water
 DP24 Securing High Quality Design
 DP25 Conserving Camden's Heritage
 DP26 Managing the impact of development on occupiers and neighbours
 DP27 Basements and Lightwells
 DP28 Noise and Vibration

DP31 Provision of, and improvements to, open space and outdoor sport and recreation facilities
DP32 Air quality and Camden's Clear Zone

Updated Camden Planning Guidance (CPG)

CPG1 – Design 2015
CPG2 – Housing 2015
CPG3 – Sustainability 2015
CPG4 – Basements 2015
CPG5 – Town Centres, Retail and Employment 2015
CPG6 – Amenity 2011
CPG7 – Transport 2011
CPG8 – Planning Obligations 2015

Belsize Conservation Area Statement 2003

Planning Considerations

During our meeting we discussed the following matters which are considered to be material considerations:

- Land use – loss of employment floorspace,
- Provision of housing,
- Design;
- Trees and biodiversity
- Amenity;
- Transport;
- Basement;
- Sustainability;
- CIL;
- S106 contributions.

I will now provide my comments in relation to the above considerations.

Land Use

Loss of the fire station sui generis use

There is no policy which specifically protects this type of use. It is recognised that the fire station use is no longer viable on the site however as the previous use provided employment and a community use which the Council seek to protect it would be beneficial for any planning submission to explore other potential uses beyond residential use. As such it is recommended that a full justification be submitted with any planning application.

Housing

Principle

Housing is a priority land use of the LDF and the principle of providing residential units at this site is considered acceptable providing you first fully justify the loss of the existing employment floorspace. You propose to create 19 residential units comprising 8 x 1 beds (42%), 10 x 2 beds (52%), 1 x 3 beds (5%).

Mix

Policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table. The Council would expect any housing scheme to meet the priorities outlined in the table, or provide robust justification (such as RP requirements) for not providing a mix in line with the table and the requirements outlined in paragraph 5.5 of the supporting text to the policy.

As discussed at our pre-application meeting the mix is not considered to be appropriate as the proposal provides too many 1 bed units for which there is lower demand for this part of the Borough. The proposal should contain a greater number of family units (3+ bedroom units).

Affordable Housing

Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. DP3 introduces a sliding scale for developments between 10 units and 50 units.

The 50% target will operate on a sliding scale for housing developments, subject to the financial viability of the development, with a norm of 10% for 1,000 sq m (gross) of additional housing and 50% for 5,000 sq m (gross) of additional housing, considered to be sites with capacity of 10 dwellings and 50 dwellings respectively.

Your scheme does not mention what affordable housing provision is to be provided. You indicated in our meeting that the scheme would be eligible for vacant building credits however following a High Court decision in August 2015 these are no longer valid and therefore affordable housing contribution must be included.

Details for calculating the affordable housing contribution are contained with CPG3 and CPG8.

Lifetime Homes and Wheelchair Housing

All units should meet lifetimes homes standards. This should be demonstrated in the submission by way of a Lifetimes Homes Assessment. 10% of the homes should either meet wheelchair housing standard or be easily adaptable to meet the standards.

Standard of residential accommodation

In accordance with Camden Planning Guidance 2 (2015) the overall internal floorspace in new self-contained dwellings (excluding communal lobbies and staircases) should normally meet or exceed the minimum standards set out in the table in paragraph 4.14. Flats 5, 6, 7, 12, 13 and 14 do not comply with these standards however it is recognised that these form existing ancillary residential units as such layouts may not be altered in listed building terms.

As discussed at the pre-application meeting there are concerns about the levels of daylight and sunlight that would reach the proposed basement units and the units at second floor level and the tower which have limited windows therefore a BRE assessment would need to be submitted with any application. All habitable rooms should have access to natural light. In accordance with the BRE standards kitchens should have an Average Daylight Factor (ADF) of no less than 2%.

Amenity space

Paragraph 4.29 of Camden Planning Guidance 2 (Housing) 2015 sets out the Council's requirements in terms of access to private amenity space for new residential units. It is accepted that this existing building may not be able to provide balconies or roof terraces, however, external amenity space i.e. access to a communal garden should still be provided where possible.

Design and impact on the listed building

Historic England (HE) gave you feedback on 9th July in an email from Claire Brady. I would like to endorse their comments and provide the following additional points in relation to the revised scheme. Some of the issues raised in that email have been addressed by the revised drawings, but some have not, and these comments should be read in conjunction with that HE document. It is also recommended that it be read in conjunction with HE's guidance document "London's Historic Fire Stations".

The revised drawings have moved somewhat in the right direction. However, there are still several sticking points in heritage terms:

In general as stated above there is insufficient and inadequate detail on the drawings. This is a large, complicated and highly rated listed building and for any proposal to be even validated, let alone considered, the presence – existing and proposed – of all historic features, such as tiling, painted numbers, historic doors, harness hooks, etc, as well as finishes, will need to be indicated on all drawings.

As with any listed building, there is a presumption in favour of retention of historic material and historic plan form in the interest of preserving the special interest of the building. For this reason, only outline advice can be given at this point. Only problems that are evident from these general plans have been mentioned and others may emerge in the future. At a later stage, detailed, wall-by-wall advice may be sought.

Basement and ground floor

The alterations at basement level are not considered contentious provided the building's external appearance is maintained along with the lateral divisions.

The breaking up of the external space into gardens, parking spaces, etc, was considered to be hostile to the site's character and special interest. This has now been addressed, with spaces now being shown as communal. The setted paving is of significance, although very subtle boundary markings might be used to demarcate parking spaces. The revised drawings include proposed metal studs, which could be appropriate.

The new external basement areas to the east and south have been reduced in size, in line with HE advice. The eastern extension to the coke store has been reduced.

Some degree of reordering in the eastern range, where flats already exist is likely to be uncontroversial, provided the general floor plan of two bedrooms with a rear living space is retained, with lateral partitions and chimney breasts. Please be advised that the fleur-de-lis ironwork on the walkways should be retained.

As requested, unit 8 has been rearranged to leave more of the corridor wall. However, there is a lot of valuable historic material in the laundry that is not itemised on the drawings and appears likely to be lost. The corridor roof lights should be retained.

It is still not clear how the steepness of the main staircase will be dealt with, except that it is planned to install a miniature lift. This staircase is considered to be an especially important characteristic, of high significance, surrounding, as it does, the original hose drop. We will require details of this lift, especially how it will interact with the bannisters and the hose drain, and where its pit and overrun will be.

The appliance bay is the most significant part of the building. As stated by HE in previous advice, uses more suitable than residential should be sought for it, and its subdivision will not be entertained. It is possible that pods of the type illustrated in the submitted photographs might be acceptable, but they will have to be much more freestanding and not largely attached to walls in corners, as shown in the revised proposal – in fact, they should be attached to no more than one wall, if at all. It might be sensible to think of them in terms of parked fire engines. The finishes in the appliance bay must be left as they are – this will be a raw space, and will have to be marketed as such; no floating floors, no alterations to wall finishes and no suspended ceilings would be supported at application stage. Any additional lighting would have to hang on gantries. As such any domestication of the space will be resisted.

In the revised proposal, the watch room has been engulfed by a pod. This is not acceptable and its relationship to the appliance bay needs to remain manifested.

The degree of opening up of the wall to the west of the appliance bay, while reduced, is still excessive.

First floor

Upward connections between units in the subdivided appliance room and the rooms above have been dropped in the revised proposal, meaning that these flats are now on one level.

The mess containing a large fireplace was originally to be converted into a corridor but is now shown as a large room, which is an improvement, but the significance of the surrounding demolitions is not clear from the drawings.

The subdivision of the gym/former dormitory has been dropped, because it was entirely unacceptable. However, a full-length mezzanine has been introduced, which is also likely to be problematic. A partial mezzanine might be considered consistent with keeping this large volume intact, but nothing like the amount proposed, either in width or length. This is a lofty, vaulted space and must remain such.

Physical subdivision of the terrace with fencing has now been dropped and replaced with what are presumably potted hedges however further details of these would need to be provided before full comment can be made...

Second floor

The very steep staircase to this level will make access difficult to this floor and those above. The revised proposal does not appear to address this issue. We would refuse to grant consent for a proposal that would trigger harmful building regulations obligations, so proof will need to be provided that this would not occur.

As discussed on site and in the pre-application meeting the addition of more than a dozen new dormers is extremely unlikely to be considered acceptable, with the southern elevation being particularly sensitive.

For these two reasons alone, it is very probable that this level will not be able to be exploited as residential space.

Tower

It remains almost impossible to envisage a realistic use for the tower. The revised proposal for unit 19 is no different from the original, where the following objections were made: apart from the aforementioned steep stairs to the second floor, the blockage of the tower's hose drop and loss of its railings would be unacceptable, although transparent flooring might be considered.

Even if the second floor itself were safely accessible, the rooms in the tower would be extremely dark and cramped, and themselves accessible only via a very steep and narrow spiral staircase. We would refuse to grant consent for a proposal that would trigger harmful building regs obligations, so proof would need to be provided that this would not occur.

It is therefore highly improbable that the tower will be able to be exploited as residential space.

Trees and Biodiversity

Policy CS15 states that the Council will require development to protected existing trees and promote to provision of new trees and vegetation and encourages biodiversity.

Trees

There are street trees on Lancaster Grove and Eton Avenue which may be affected by the proposals. The building should be designed so as not to impact on this street trees. A BS:5837 2012 report (Trees in relation to design, demolition and construction) will be required.

Biodiversity

Any new development should incorporate biodiversity enhancing measures such as biodiverse roofs, green walls, bird and bat bricks in line with planning policy and guidance.

Neighbouring amenity

Policy DP26 states that development should protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust and microclimate.

The closest neighbouring residential units are located at 22 Eton Avenue and 34 Lancaster Grove. It is noted that the proposed side extension would not be higher than the existing fence therefore impact on these dwellings would be minimal.

Noise

Details of any plant proposed as part of the development should be included in the application. An Acoustic Report will be required to assess the impact of any plant on the nearest noise sensitive window. Noise levels must comply with the Council's noise standards set out in policy DP28.

Transport

Car parking

The proposed level of on-site car parking would likely be acceptable as the PTAL rating is lower than 4 (varies between 2 and 3). Turning movement diagrams would need to be provided with any planning submission for the car park layout. These would need to demonstrate that cars could access each space efficiently and safely. They would also need to show that cars would be able to enter and exit the car park in a forward gear.

The site is located in the Belsize controlled parking zone which our records indicate suffers from parking stress (110 permits issued for every 100 spaces). We would therefore need the entire development to be car capped and this would be secured as a section 106 planning obligation. It would mean that residents would not be able to obtain residents parking permits for the Belsize controlled parking zone from the Council.

Electric vehicle charging points would need to be provided within the site in accordance with DP18 and the London Plan. Details should be provided on the proposed plans.

There is a car club vehicle located directly adjacent to the site. You should be advised that residents could join the car club scheme if they want to.

Cycle Parking

The proposed level of provision would need to meet the minimum requirements of the London Plan. A covered, secure and fully enclosed cycle store at ground floor level as shown on drawing number 004C would be likely be considered acceptable. The specific cycle parking facilities would need to comply with CPG7 guidance.

Construction Management Plan (CMP)

Policy DP21 seeks to protect the safety and operation of the highway network. For some developments this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via S106. Given that the site is located in the Belsize Conservation Area and the proposals would create in excess of 10 residential units, a draft construction management plan would be required at validation stage. A copy of the pro-forma is attached (please note that some of the questions would need to be left unanswered until a contractor has been appointed.) Please also see Chapter 8 of Camden Planning Guidance 6 for more details on the requirements for a CMP and <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/planning-obligations-section-106/>

Deliveries and Servicing

It is assumed that the majority of deliveries and servicing activity would take place from the public highway directly adjacent to the site. Details should be provided as part of any subsequent planning application.

Highways works

We would need to undertake some highway works on completion of any development (e.g. repaving of footway on Lancaster Grove) and an appropriate financial contribution would need to be secured as a section 106 planning obligation.

Basement

If you are proposing any excavation you will need to submit a Basement Impact Assessment which satisfactorily demonstrates that the proposal would maintain the structural stability of the building; avoid adversely affecting drainage and run-off or cause other damage to the water environment; and avoid cumulative impacts upon the structural stability or water environment in the local area. Detail on preparing a Basement Impact Assessment is contained within CPG4 – Basements and lightwell 2015 and it is recommended that you ensure that BIA is carried out by suitably qualified professionals as set out in paragraph 3.6 of CPG.

Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area. I would also like to draw your attention to paragraph 3.33 of CPG which states that in order to provide greater certainty over the potential impacts of excavation we will expect an independent verification of the BIA which would be funded by the applicant.

For further information please see our website here:

<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/basement-developments/basement-developments/>

Sustainability

All new development is expected to incorporate sustainable development principles into its design and implementation in line with policies CS13 (Tackling climate change and promoting higher environmental standards) and policy DP22 (Promoting sustainable design and construction). Developments should follow the London Mayor's Energy Hierarchy (namely 1. use less energy, 2. supply energy efficiently and 3. use renewable energy) to show that renewable energy is not just an 'add-on'.

Developments involving 5 or more dwellings and/or 500sq m (gross internal) floorspace or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy (please refer to CPG3 (Sustainability) 2015 for more details on what to include in an energy statement).

The creation of 5 or more dwellings from an existing building will need to be designed in line with BREEAM Refurbishment criteria and will be expected to achieve minimum of 60% of the un-weighted credits in the Energy category and an overall 'excellent' rating.

Camden would also seek to promote contributions to and the integration of local energy networks into development where possible. You are advised to consider the potential for the development to connect to and contribute towards local energy networks.

It would also need to be ensured that any development limits the amount of run off and waste water entering the combined storm water and sewer network in line with policy DP23 (Water), this should be done by a sustainable urban drainage system. Major developments are now required to achieve greenfield run-off rates and where reasonably practicable to constrain run off volumes to greenfield run off volumes for the 1 in 100 years 6 hour event. Greenfield run-off is the rate that water flows over land which has not been previously developed. SuDS are designed to control water run-off close to where it falls, and as such developers should follow the drainage hierarchy in policy 5.13 of the London Plan (justification will be required for each level the developer is unable to provide on-site). The applicant is advised to complete the SuDS proforma as part of their application http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3305692&

Community Infrastructure Levy

The development would be subject to the Mayor of London's CIL and Camden CIL. Camden's charging schedule, can be found here <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/community-infrastructure-levy.en>

Possible S106 Contributions

- Affordable housing
- Public Open Space contributions
- Education contributions
- Social and community facilities contributions
- Construction / Servicing Management Plans
- Energy Statement
- Environmental improvements / public realm contribution
- Highways contribution

Building Control

Please note this type of work will fall under the requirements of the Building Regulations.

Camden Council have an in-house Building Control service with a dedicated team of professional surveyors, technicians and specialist officers; their

experience ranges from domestic to commercial properties including entertainment, worship, educational, hospitality etc. As part of the Local Authority Building Control partnership agreement they have also dealt with properties outside the borough and reached out as far as Slough and Hillingdon.

The Building Control service offer competitive prices and the possibility to hold a preliminary meeting to discuss your project in our offices at no extra cost.

Please get in touch with Judith Pineda on 020 7974 5756 or Judith.pineda@camden.gov.uk; building.control@camden.gov.uk.

Next steps

You are advised to enter into a Planning Performance Agreement, the details of which can be agreed with officers. For further details see our website <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/pre-application-advice/pre-application-advice-for-major-developments.en>

Your early consultation with the surrounding conservation area CAACs, local residents and any other local amenity groups, is strongly recommended.

If you have any queries about the above letter or the attached document please do not hesitate to contact me on **020 7974 1343**.

This response represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your emerging proposals will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Yours sincerely,

Rachel English

Senior Planning Officer
Development Management

APPENDIX THREE

HISTORIC ENGLAND PRE-APPLICATION ADVICE (09/07/15)

From: Brady, Claire
Sent: 09 July 2015 10:56
To: 'English, Rachel'
Cc: Baxter, Nick (Nick.Baxter@camden.gov.uk); Reading, Billy
Subject: RE: Belsize Fire Station 36 Lancaster Grove 2015/3546/PRE

Dear Rachel,

Thank you for arranging our visit to the fire station last week. It is understood that the building is on the market and the applicants do not currently own the building, but are seeking to gain advice that will inform the purchase process/price.

As you are aware, the fire station is grade II* listed and is therefore of national significance. It should be noted that this listing was upgraded from II to II* in 2009 and the listing description therefore provides a good outline of the key areas of significance.

In heritage terms, the proposed residential use provides a good fit for many areas the building. This is particularly the case where the building formerly contained flats for accommodating fire station staff. It is understood from the original plans that there were 8 self-contained flats, each with two bedrooms.

The main issues arise where it is proposed to create residential spaces where they did not previously exist. In our view, a bespoke solution is required for these spaces and there are some areas of the building, particularly the appliance bay, where a residential use should be considered as a last resort, only once less intrusive/intensive uses have been fully tested and ruled out.

As the proposals are complex in nature, they will be discussed on a floor by floor basis, followed by a series of general points, as follows:

Basement

Units 1-4

The existing basement lies beneath the residential wing on the east side of the building and comprises three compartments that have been subdivided internally to provide storage areas. The proposal is to lower the floors within this area by approximately 30cm and to convert each compartment into a 1 bedroom flat. It is proposed to excavate to the east side of the wing to provide a new duplex flat over ground and first floor levels, replacing the existing oil storage building.

In our view, the key areas of significance lie with the external appearance of the building at the basement level and the main lateral structural partitioning. Any changes within this area should have a relatively low external impact. It would therefore be useful to see accurate comparison drawings showing existing and proposed elevations, including the area below the front arches. To note, the new north window to Unit 2 is not shown on the proposed elevation and would be below ground level.

The proposed lightwells to the south elevation are considered overly dominant. We would recommend a tighter arrangement that hugs the building with a simple railing detail around. More information is required regarding the proposed alterations to the arched windows.

The proposed demolition of the existing oil store and excavation down to create a large lightwell area is considered to harm the character of the building due to the proposed loss of original fabric, loss of the ground level garden space and introduction of an alien built arrangement. Whilst we would accept some extension at ground floor level to the oil store (north side), this should be modest in nature and should respect the general character, architecture and arrangement of the site. We do not accept that this work is 'enabling development', as stated in the accompanying planning statement. The former fire station is in

a very good condition and is unlikely to have a conservation deficit. We would refer you to our guidance on enabling development.

It has to be asked '*where the proposed bin store and cycle store would be located?*' The existing basement areas and oil stores would appear to be the perfect locations for such uses and should be considered before proposing any new stores or extensions for such uses.

Ground floor

External areas

The proposals relating to the east extension are discussed above.

The proposals include the provision of parking to the front area adjacent to the residential wing. The existing paving in this area is considered to be of some significance and the arrangements for bay demarcation would need to be detailed in any submission.

The area outside the appliance bay is proposed to be subdivided and bounded by piers and metal railings/gates. An area of green space is proposed outside Unit 11. The granite sett paving outside the paving area is considered to be of high significance and very sensitive to change. We would recommend that this area should remain largely unaltered.

The existing garden space at the rear is green and vegetated in character and makes a significant contribution to the surrounding conservation area and to the setting of the former fire station. We would recommend that this area is not physically subdivided into ownerships.

Units 5-7

These units were originally laid out as flats when the building was first built. The proposals to provide residential use in these former flats is unlikely to be controversial, provided the general floorplan is retained (two bedrooms and rear living space), as well as lateral partitions and chimney pieces.

Unit 8

This unit incorporates the former billiards/mess room, the former laundry and part of the main corridor space, as well as proposing a single storey extension on the west side of the building. The proposals for reuse of the mess hall as a living/dining space appear uncontentious. There are some features of interest in the laundry, including clothing drying rails and heat control levers. Whilst the subdivision of this space is not considered to be contentious, the existing features of interest should be reincorporated/reused. The extension of the flat into the hallway should pay more regard to the existing floorplan and should avoid over subdivision of this space and retention of the external door. The ceiling lights in this location should be retained, although renewal may be acceptable. Whilst a single storey extension on the west side of the building may not be objectionable in principle, the proposed removal of the external wall and chimney breast is considered to cause harm and is not acceptable.

Units 9-11 - Appliance bay and former watch room

The appliance bay is considered to be of high significance and retains much of its original character and fabric. The proposed works to subdivide the appliance bay, to break through the west wall and to break through the ceiling to provide first floor access are considered to cause harm. This is due to the loss of the open character of the appliance bay and loss of significant historic fabric. The appliance bay is not considered to be an easy fit for residential use. We would therefore recommend that alternative uses are sought, which should be market tested.

The former watch room is historically associated with the appliance bay and should be linked to that bay. Whilst the existing bay window is modern, this maintains the historic degree of separation between the rooms, which should be reflected in any alternative proposals.

First floor

Unit 9

This duplex unit occupies the former mess room, which is a highly significance space, associated ancillary rooms and laundry. We would recommend reviewing the original plans of this space and the existing fabric in order to gauge the level of original fabric retained. The proposals should seek to retain this original fabric and any subdivisions should still allow the chimneypiece to form the central feature of a good sized room, rather than an incidental feature within a corridor. The existing pole access cubicle and associated pole should be definitely shown as fully retained.

Unit 10

This unit occupies the former dormitory area which would have been subdivided with low partitions, later used as a gym. This is a considered to be a highly significant space characterised by the lofty exposed ceiling structure, tall windows and the pole access cubicle. The volume of this space is critical. The proposals to subdivide the space are not considered acceptable. We would instead recommend that change is limited and a non-conventional layout be considered, possibly taking the form of a studio flat with sleeping mezzanine.

Units 12-15

These units were originally laid out as flats when the building was first built. The proposals to provide residential use in these former flats are unlikely to be controversial, provided the general floorplan is retained (two bedrooms and rear living space), as well as lateral partitions and chimney pieces. The amalgamation of a small unit and standard size unit to create Unit 15 is unlikely to be contentious.

Walkway outside Units 12-14

The existing glazed cover over the walkway appears to be relatively modern and is considered to be of low significance. The replacement of this glazed cover is considered acceptable, subject to detail of design and fixing. To note, the existing eaves fleur de lis ironwork at eaves level should be retained.

Terrace Garden

The proposed sub division of the terrace garden is unlikely to work if access is required to Unit 10 via the terrace. Regardless of this, the rooflights to the corridor space below are of significance and should be retained.

Second Floor

Units 16-18

The existing roof space at this level does appear to be large and usable. However, access to this space will be via the main stair, which steepens up to this level and is of high heritage significance, so unlikely to be amenable to change. Before we commence any discussions regarding the provision, or otherwise, of alterations necessary to provide accommodation at this level (dormers on the roofslopes, alterations to the roof structure over Unit 18 etc) we need to know that the provision of accommodation at this level is in fact compliant with Building Regulations (given the steepness of the staircase and lack of secondary means of escape). As such, we refer this back to yourselves (Camden Building Control) and the applicants to confirm that this is not an inhibition to the proposed residential use. To note, the provision of additional roof dormers may be controversial and will require further consideration.

Unit 19

This unit is entered from the stairwell at second floor level and rises to the full height of the tower. This proposal is fraught with issues and in our view that the creation of a flat in this area is unlikely to be acceptable for the following reasons:

- The openness of the stairwell is a key feature of the building and is a clear indicator of the history of the building. Similarly, the iron balustrading around the stairwell openings is considered to be of significance. The proposed flooring over the stairwell at each level and the removal of the iron balustrade is considered unacceptable.
- The proposed wall on the staircase landing blocks the light to the main staircase from the adjacent window;
- There are likely to be non-heritage issues that preclude a residential use in the tower, such as lack of compliance with Building Regulations (means of access and escape) and inadequate light/ventilation to the unit (section required showing very small/low windows).

We would refer the applicants to our guidance document 'London's Historic Fire Stations', which states that if the building is in residential use, a service charge may need to be signed up to by residents to upkeep the building. We would therefore advise that the care of the tower should be taken into account in the negotiating price, given the likelihood that this space cannot be sold as residential floor space.

General

Residential Mix

Whilst the principle of residential use is considered to be acceptable in historic building terms (for most areas of the building), it is likely that the scheme will produce predominantly one and two bedroom residential units. As such, the mix of units may not be compliant with local planning policies. In line with our guidance document entitled 'London's Historic Fire Stations', we would request that flexibility be applied to the mix of residential units, given the importance of retaining the plan form and fabric of the listed building.

Stairwell

The existing staircase is considered to be of high significance. In order to give further views on the proposed lift, details will be required of the lift (including method of fixing, appearance, overrun etc.) and associated changes to the staircase balustrades. Features such as the drain, loading doors, hooks and pullies should be retained.

Windows

The existing windows are generally in a good condition and are considered to be of high significance. There is a presumption in favour of their retention.

Services

Provision should be made for discrete service installation or communal servicing. Individual boiler flues on the external elevations of the building in prominent locations will not be considered acceptable. As such, alternative heating provision should be made, where necessary.

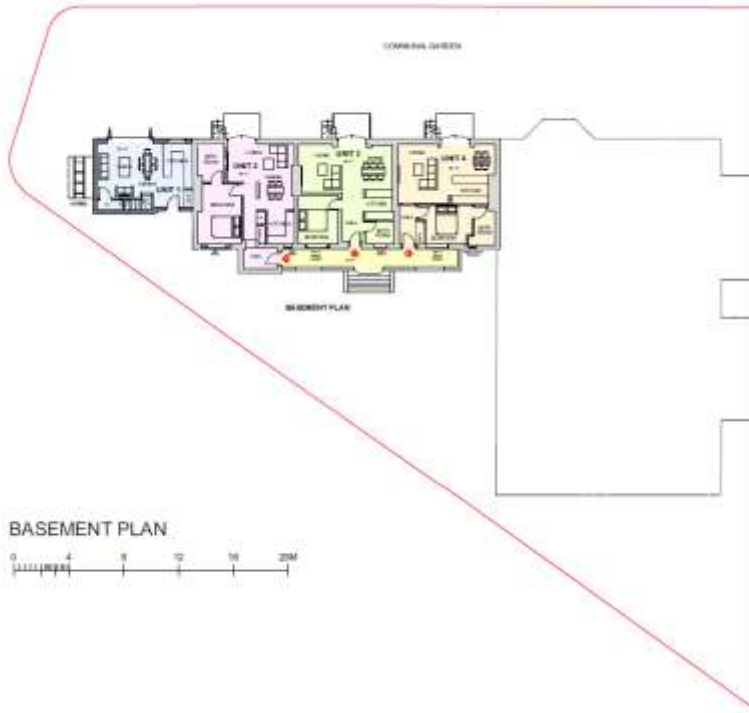
I look forward to meeting you again next week. Should you have any further queries, please do not hesitate to contact me.

Many thanks,

Claire Brady
Inspector of Historic Buildings and Areas
National Planning and Conservation Department

APPENDIX FOUR

AMENDED PRE-APPLICATION SUBMISSION 05/10/15 – DRAWING EXTRACTS



BASEMENT PLAN
0 4 8 12 16 20M

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FOR PRE-APP
CONSULTATION



**SHAUN KNIGHT
ARCHITECTURE**

45 FALCON ROAD, HAMPTON
TQ12 2PA
01753 871238
01753 3571087
sk@shaunknightright.com
37 shaunknightright.com

| |
|------------------------------|
| PROJECT: 36 LANCASTER GROVE |
| TITLE: BASEMENT PLAN |
| Date: 09/03/20 |
| Scale: 1:100 (A1) Sheet: 001 |
| DRAWING NUMBER: 001 B |



GROUND FLOOR PLAN
0 4 8 12 16 20M

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37 shaunknightright.com

| |
|---------------------------------|
| PROJECT: 36 LANCASTER GROVE |
| TITLE: GROUND FLOOR PLAN (PTCN) |
| Date: 09/03/20 |
| Scale: 1:100 (A1) Sheet: 001 |
| DRAWING NUMBER: 001 C |



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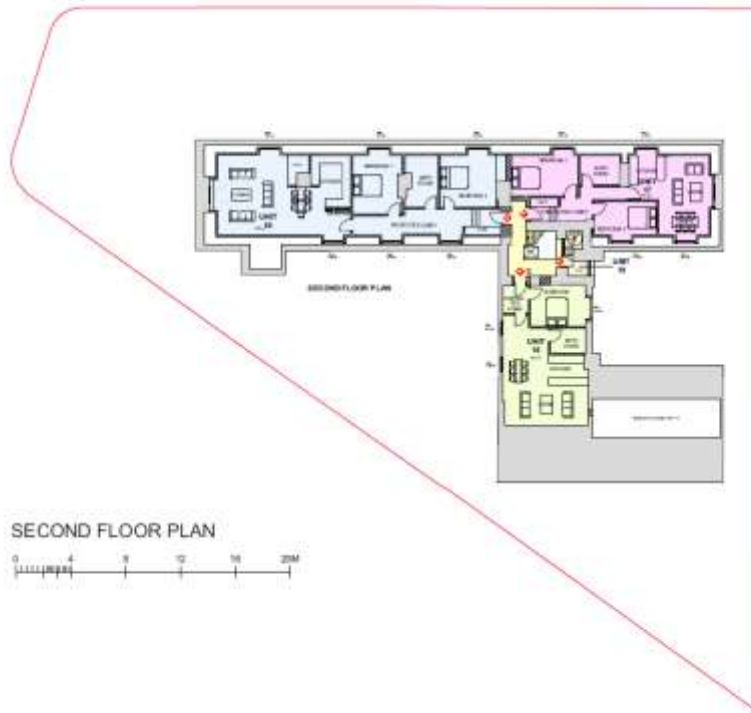
FOR PRE-APP
CONSULTATION



**SHAUN KNIGHT
ARCHITECTURE**

40 FALCON ROAD, HAMPTON
TOTTENHAM
TOTTENHAM
TOTTENHAM
TOTTENHAM

PROJECT: 36 LANCASTER GROVE
TITLE: FIRST FLOOR PLAN
DATE: 09/06/2019
SCALE: 1:100 (A1) 09/06/2019
DRAWING NUMBER: 001 B



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FOR PRE-APP
CONSULTATION



**SHAUN KNIGHT
ARCHITECTURE**

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TOTTENHAM
TOTTENHAM
TOTTENHAM

PROJECT: 36 LANCASTER GROVE
TITLE: SECOND FLOOR PLAN
DATE: 09/06/2019
SCALE: 1:100 (A1) 09/06/2019
DRAWING NUMBER: 001 A

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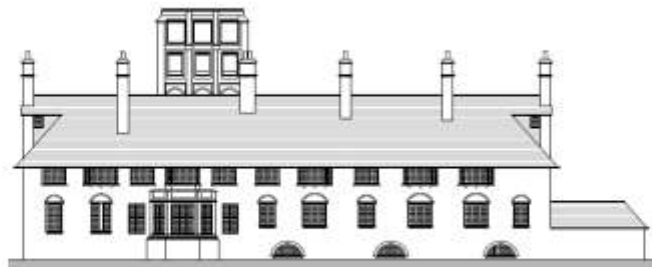
| |
|----------------------------------|
| PROJECT: 36 LANCASTER GROVE |
| TITLE: 3RD, 4TH, 5TH FLOOR PLANS |
| DATE: JUNE 2015 |
| SCALE: 1:50 (A1) Sheet 001 |
| DRAWING NUMBER: 001 |

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PROPOSED SOUTH ELEVATION

FOR PRE-APP CONSULTATION



EXISTING SOUTH ELEVATION

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 01753 871238
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 www.shaunknigharchitecture.com

| |
|---|
| PROJECT: 36 LANCASTER GROVE |
| TITLE: EXISTING AND PROPOSED SOUTH ELEVATIONS |
| DATE: JUNE 2015 |
| SCALE: 1:50 (A1) Sheet 001 |
| DRAWING NUMBER: 001 C |





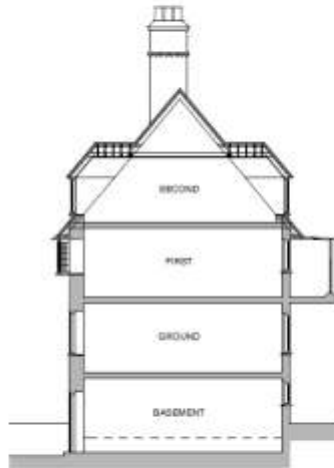
**SHAUN KNIGHT
ARCHITECTURE**
40 FALCON ROAD HAMPTON
TW12 2NA
07524 8 19 2384
0208 287 2947
E: shaun.knight@btinternet.co.uk
W: shaunknightarchitecture.com

PROJECT: 45 TOTTERIDGE
COMMON
TITLE: PROPOSED SOUTH
ELEVATION SHOWING
CORNERS
Date: AUGUST 2015
Scale: 1/750 Sheet: 004
DRAWING NUMBER: 005

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FRONT SOUTH ELEVATION



SECTION COMPARED TO EXISTING CORNER OFFSHOOT
ON MAIN ROOF

FOR PRE-APP
CONSULTATION



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40 FALCON ROAD HAMPTON
TW12 2NA
07524 8 19 2384
0208 287 2947
E: shaun.knight@btinternet.co.uk
W: shaunknightarchitecture.com

PROJECT: 36 LANCASTER
GROVE
TITLE: SECTION SHOWING
MAIN ROOF
CORNERS
Date: 27th 2015
Scale: 1/200 Sheet: 004
DRAWING NUMBER: 005

APPENDIX FIVE

HISTORIC ENGLAND FOLLOW-UP PRE-APPLICATION ADVICE 13/10/15



LONDON OFFICE

Mandip Sahota
 Nicholas Taylor and Associates
 31 Windmill Street
 London
 W1T 2JN

Direct Dial: 0207 973 3777

Our ref: PA00385646
 13 October 2015

Dear Mr Sahota,

Pre-application Advice

BELSIZE FIRE STATION , 36 LANCASTER GROVE

Thank you for arranging my second visit to the Fire Station on the 6th October 2015 and for showing me your amended proposals for conversion of the building into residential units. Many of the changes that you have made to the proposals are welcome and are in line with my previous advice.

Please note that this advice letter follows my previous email of 9th July 2015 to Rachel English at the London Borough of Camden and our subsequent meeting at the offices of the London Borough of Camden on the 14th July 2015. Due to the complexity of the proposals, I will again discuss the amended scheme on a floor by floor basis:

Basement

Units 1-4

The proposals have been amended in accordance with my previous comments and now show the proposed north window to Unit 2 and more appropriately scaled lightwells on the southern elevation. It is understood that the oil store is now proposed to be replaced with a much more modest addition at ground floor level with roof level accommodation over. Provided this new addition is appropriately detailed and is constructed in matching facing materials, it is unlikely to be of any particular concern.

Ground floor

External areas

The proposals have been amended in accordance with my previous comments and now show the retention of the existing unsegregated arrangements of the forecourt and the southern garden, as well as provision for demarcation of parking spaces, new bin and cycle stores in the walled courtyard. In respect to the new bin and cycle stores, I would recommend that they are kept below the height of the boundary wall in order to minimise their visual impact in views from the street.



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700
 HistoricEngland.org.uk



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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



LONDON OFFICE

Units 5-7

No change

Unit 8

This proposals still show works which are considered to cause harm, including the removal of original partitioning and part of the external wall containing a chimney breast. I would therefore recommend further revisions to the proposed plan form of this flat in order to retain as much original layout and fabric as possible. Features such as the flue handles should also be retained, where possible.

Unit 9 (formerly units 9-11)

The creation of a single unit within the appliance bay space would clearly involve less intervention into the volume and fabric of the space and is a more acceptable solution than the previous proposals to divide into 3 units. The idea of creating bedroom/bathroom pods that mimic the volumes of the original fire engines is an interesting idea and more work should be undertaken showing how these pods would interact with the side walls of the space - ideally they should be set in from the sides. The levelling of the existing flooring was discussed and the possibility of laying new flooring. Since our meeting, I have forwarded a photo to yourselves of a similar fire station that similarly appears to have square tiles with diagonal bands, therefore making it likely that the flooring within Belsize Fire Station is original. In which case, whilst some releveling could be acceptable at the rear of the unit, I would recommend that you seek to retain and reuse as many of these original floor tiles as possible. As discussed, further work would need to be undertaken on this particular part of the building, particularly scheduling existing features such as windows, doors, tack hooks etc, and detailing the impact of the proposals on those features.

Unit 10

The proposals have been amended in accordance with my previous comments and now include the provision of a central mezzanine floor. I certainly welcome the reduction of the proposed mezzanine to half the length of the room, rather than the full length (as shown). Further details are also required in respect to the proposals to open up part of the ceiling to the roof. I also requested the retention of the existing door case and arch leading through to the mess area.

Unit 11

The proposals have been amended in accordance with my previous comments and now show the chimneypiece as a central feature to a good sized room. In order to create further balance and symmetry around the chimneypiece, the retention of the left hand partition to the proposed kitchen area would be welcomed.



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Units 12-14

No change

Walkway outside Units 12-14

No change

Terrace Garden

The proposals have been amended in accordance with my previous comments and now show the provision of a communal area with planting and retention of the corridor lights below.

Second Floor**Units 16-18**

My main concerns with the previous scheme related to the practicalities of using the loft space (particularly Building Regulations) and the imposition of external dormer windows. It is understood that you have received formal advice from your appointed Building Regulations advisors stating that they do not consider it necessary to provide a secondary means of access or escape. You have also presented images of your proposed dormers in the context of the southern elevation. In my opinion, these dormer windows do not appear to challenge the architecture of this facade and in my opinion, could be acceptable in heritage terms, providing they are appropriately detailed and constructed.

Unit 19

My concerns regarding the impact of the proposals on the significance of the tower and the internal stairwell remain. As such, much more detail is required of the measures that you consider may mitigate any harm to the character of the stairwell resulting from the segregation of part of the second floor landing and the upper parts of the tower from the main stairwell. Similarly, you need to properly illustrate the impact of the proposed residential conversion of the tower. Should it be the case that you consider additional windows are likely to be necessary in the walls of the tower, please be advised that such proposals are likely to cause harm and to raise an objection from Historic England.

General

My previous comments regarding residential mix, the stairwell, windows and services are as per my email of 9th July 2015.

Next Steps

It is understood that you will be revising the plans again before submitting them formally for planning permission and listed building consent. I would be happy to look again at any further revised plans and to give advice on those revisions, prior to



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LONDON OFFICE

submission.

Yours sincerely

A handwritten signature in cursive script that reads "Claire Brady".

Claire Brady
Inspector of Historic Buildings and Areas
E-mail: claire.brady@HistoricEngland.org.uk

Nick Baxter, London Borough of Camden
Rachel English, London Borough of Camden

BELSIZE FIRE STATION , 36 LANCASTER GROVE
Pre-application Advice

Information Provided

Drawings accompanying email of 6th October 2015



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700
HistoricEngland.org.uk

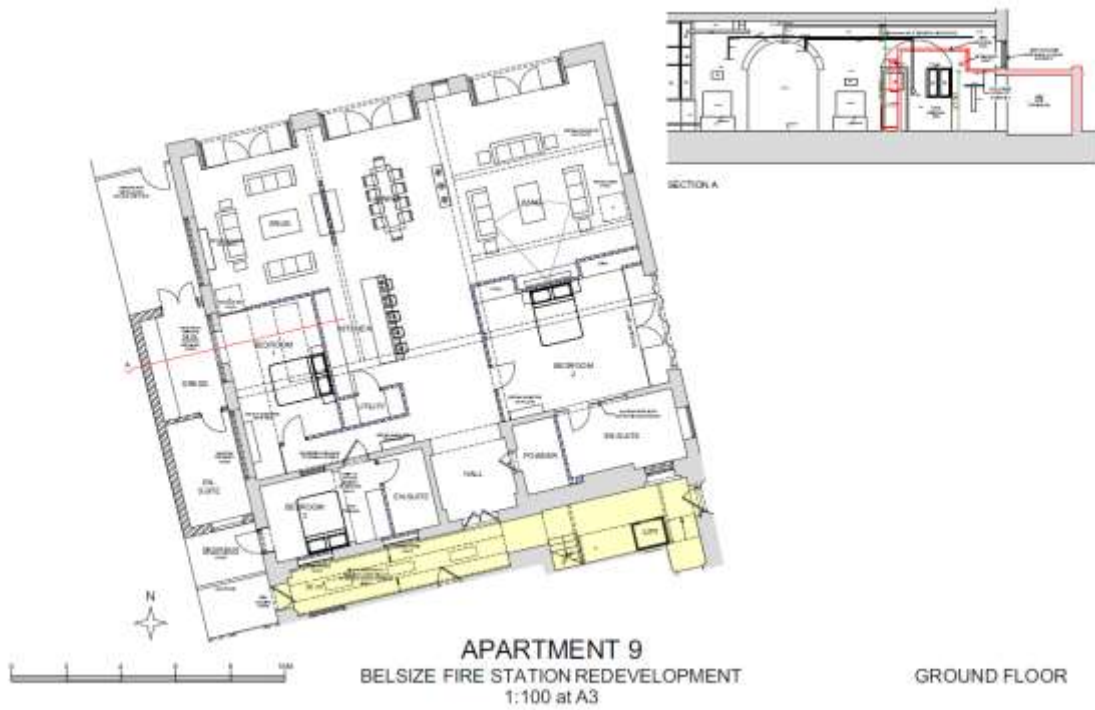


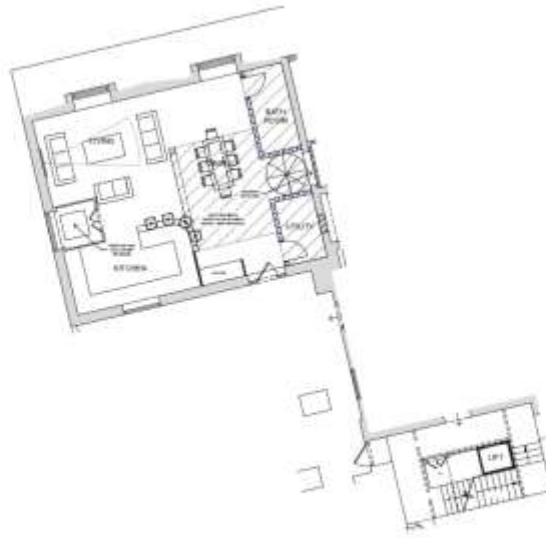
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APPENDIX SIX

AMENDED PRE-APPLICATION SUBMISSION 10/12/15 – DRAWING EXTRACTS





APARTMENT 10
BELSIZE FIRE STATION REDEVELOPMENT
1:100 at A3

FIRST FLOOR



APARTMENT 11
BELSIZE FIRE STATION REDEVELOPMENT
1:100 at A3

FIRST FLOOR



LIFT



SECOND FLOOR



THIRD FLOOR



FOURTH FLOOR



FIFTH FLOOR



APARTMENT 19
BELSIZE FIRE STATION REDEVELOPMENT
1:100 at A3

2nd to 5th FLOORS

APPENDIX SEVEN

HISTORIC ENGLAND FOLLOW-UP PRE-APPLICATION ADVICE 17/12/15

From: Brady, Claire
Sent: 17 December 2015 12:03
Subject: RE: Belsize Park Fire Station

Thank you for sending through the revised drawings. I've taken a quick look and the revised flat layouts and these appear to be much better resolved. You would still need to provide a lot more detail of the proposed pods within the original appliance bay and their relationship to the surrounding historic fabric. Also, I would still consider the proposed tower flat to cause some harm to the significance of the main stair well. You will need to address this issue in your heritage statement and justifying why you consider the proposals necessary and what measures you have taken to mitigate harm.

I hope this is helpful. If you have any further queries, please do not hesitate to contact me.

Many thanks,

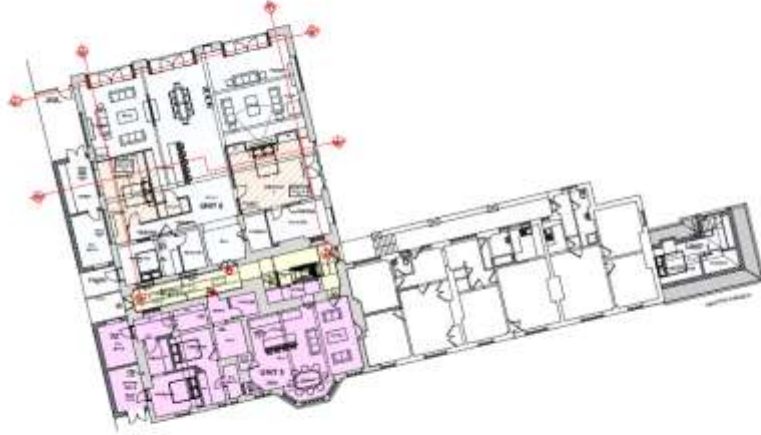
Claire Brady
Inspector of Historic Buildings and Areas
National Planning and Conservation Department



APPENDIX EIGHT

AMENDED PRE-APPLICATION SUBMISSION 19/01/16 – DRAWING EXTRACTS

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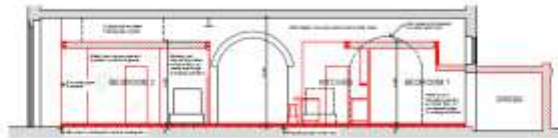


PROPOSED GROUND FLOOR PLAN



| |
|---|
| PLANNING |
| |
| SHAUN KNIGHT ARCHITECTURE |
| 40 FALCON ROAD, HAMPTON TOTTENHAM TOTTENHAM TOTTENHAM SHAWNKNIGHTARCHITECTURE.COM |
| PROJECT: 36 LANCASTER GROVE |
| TITLE: PROPOSED GROUND FLOOR PLAN |
| Date: 06/09/2015 |
| Scale: 1:500 A3 Size: DIN |
| DRAWING NUMBER: 006 |

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SECTION A - A



SECTION B - B



SECTION C - C



SECTION D - D



| |
|---|
| PLANNING |
| |
| SHAUN KNIGHT ARCHITECTURE |
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| PROJECT: 36 LANCASTER GROVE |
| TITLE: DETAILS - APPTS SECTIONS |
| Date: 06/09/2015 |
| Scale: 1:50 A3 Size: DIN |
| DRAWING NUMBER: 006 |

APPENDIX NINE

LOCAL COMMUNITY PRE-APPLICATION CONSULTATION COMMENTS 16/09/15

NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

BELSIZE PARK FIRE STATION

RESIDENTS CONSULTATION 16 SEPTEMBER 2015

| Name | Contact Info | Comment |
|--------------------|--------------|--|
| Harold Lorenzelli | [REDACTED] | 19 units is a lot of pressure on parking spaces - the more are accommodated <u>on site</u> the better. |
| HILARY PAGE | [REDACTED] | Only 8 spaces for cars is a great concern as not enough parking on street for existing homes. |
| MARIL UPSON | [REDACTED] | Please keep me informed Thank you. |
| PETERSON AUSTIN | [REDACTED] | — |
| JOONAH LABI | [REDACTED] | — |
| Timothy Armer | [REDACTED] | Generally I like it, my only reservation is the no. of parking spaces. Please keep me informed. |
| BO | [REDACTED] | ... please keep me informed |
| A. GIBBS | [REDACTED] | Please keep me informed. I live opposite! |
| Thomson | [REDACTED] | ? Parking Please keep me informed |

NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

BELSIZE PARK FIRE STATION RESIDENTS CONSULTATION 16 SEPTEMBER 2015

| Name | Contact Info | Comment |
|-------------------|--------------|---|
| Consuelo Pelt | [REDACTED] | Appearance looks modest + sympathetic. Concern about density? |
| ANDY TURNER | [REDACTED] | |
| LAWRENCE HILLEN | [REDACTED] | Why no community space? (NUSEUM) |
| Beverly Barnett | [REDACTED] | Keep outside as is, and ensure there is still adequate parking available on road for existing residents |
| GIOVANNI SABATINO | [REDACTED] | ENSURE THERE IS STILL ENOUGH PARKING SPACE ON THE STREET FOR EXISTING RESIDENTS. |
| ROBERT DAVIS | [REDACTED] | PLEASE KEEP ME INFORMED I LIVE DIRECTLY OPPOSITE - CAR PARKING / DENSITY OF CONCERN - |
| Kate + M216 | [REDACTED] | ? Parking for residents f ? Length of build ? Affordable homes |
| | | ? Keep outside same ? Keep vs informed |
| | | ? Why 'For Sale' sign. ? Keeping cobblestones |

APPENDIX TEN
MARKETING BROCHURE EXTRACT



FREEHOLD FOR SALE



Former Belsize Fire Station, 36 Lancaster Grove, London NW3

Approx. 16,600 Square Feet (1,542 Square Metres)

Site Area of Approx. 0.44 Acres (0.1761 Hectares)

Subject to Contract

T: 020 7891 2345

80 Cannon Street London EC4N 6HL F: 020 7891 2300

Disclaimer: The statements contained in these particulars are believed to be correct, but their accuracy is not guaranteed and they do not constitute any part of an offer. None of such statements is to be relied upon as a statement or representation of fact and intending purchasers/tenants must satisfy themselves as to their correctness by inspection or otherwise.

APPENDIX ELEVEN

CORRESPONDENCE RECEIVED FROM NEWLON AND ORIGIN HOUSING ASSOCIATIONS

From: Sarah Timewell
Sent: 04 January 2016 14:39
Subject: RE: Belsize Park Fire Station

Thank you for being in contact and discussing your clients scheme at Belsize Park.

As I explained to you today, we are not in a position to manage just one S106 unit at the above scheme. Being involved in a S106 partnership requires a great deal of work to ensure the correct design and quality for a Housing Association flat. To do this for one flat is not viable for NHT.

I wish you luck with your scheme – as it is a lovely property.

Regards

Sarah

Sarah Timewell
Senior Project Manager
Newlon Housing Trust

From: Gareth Jones [mailto:Gareth.Jones@originhousing.org.uk]
Sent: 18 January 2016 17:12
Subject: RE: Belsize Park Fire Station, Lancaster Grove, Belsize Park

I think that only 1 or 2 homes in a scheme like this will be too few to justify the set up costs of management. Without seeing the plans I imagine these will be alongside other homes without separation for management and being a Grade 2* listed building service and other costs will prevail against provision of affordable homes.

Kind Regards

Gareth Jones
Director of Development
Origin Housing Ltd