

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

PLANNING STATEMENT

Prepared By



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1.0 INTRODUCTION

- 1.1 This statement accompanies an application for Planning and Listed Building Consent by Vulcan Properties, the owners of the former Belsize Park Fire Station, 36 Lancaster Grove, Belsize Park. The application involves proposals to refurbish and reconfigure the former Fireman's living quarters in the property, creating 7 self contained flats (Use Class C3).

- 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).
- 1.3 Belsize Park Fire Station is a Grade II* listed building. Such buildings are important assets. Vulcan Properties recognises that they are an irreplaceable resource and they should be conserved in a manner appropriate to their significance.
- 1.4 Vulcan Properties seek to sustain and enhance the significance of the asset and put it to a viable use consistent with its conservation, ensuring a sustainable long term use for the building.
- 1.5 In that regard, earlier this year Vulcan Properties secured listed building and planning consents 2016/1128/L and 2016/0745/P for the *'Part change of use of the former fire station to provide 11 self contained residential units, including replacement single storey side extension to east elevation and erection of two single storey side extension to west elevation and insertion of roof dormers, with associated external alterations, landscaping and parking'*.
- 1.6 The parts of the building outwith the above consent comprise the former living quarters of the building, accommodating a series of self contained flats and dormitories. These areas were omitted from the previous application as they were substantially occupied and/or subject to tenancy restrictions, meaning that no works could have been undertaken within those areas at the time the application was submitted. These matters have now been resolved allowing this subsequent Planning and Listed Building Consent application to be submitted.

- Layout of this Document

- 1.7 This statement provides a detailed description of the site and surrounding area in section 2.
- 1.8 In section 3 we provide a summary of the background to these proposals. This section includes a brief summary of the planned closure of the station by the LFEPA back in 2014, and relevant planning history, namely consents 2016/0745/P and 2016/1128/L.
- 1.9 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. As those discussions were undertaken regarding the development as a whole, we provide a summary of only those points relevant to the proposals now sought in section 4.
- 1.10 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 listed building consent application.
- 1.11 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.

- 1.12 As part of the listed building consent, we submit the following documents which should be read alongside this statement.

Document	Author
- Heritage Statement	DLG Architects
- Design and Access Statement	Shaun Knight Architects
- Daylight/Sunlight Assessment	Brooke Vincent and Partners
- Energy and Sustainability Statement	XC02
- Flood Risk Addendum + Pro-forma	Paul Garrad

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 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 (NORTH ELEVATIONS)

- 2.3 The building as a whole 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 (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 wider 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 eastern wing of the building.
- 2.6 Over the upper floors, the majority of the building accommodates self contained flats, historically occupied by former firemen and women. 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 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.
- 2.8 This Planning and Listed Building Consent application is concerned with only the ground and first floors of the eastern wing, and part of the first floor of the main wing/body of the building.
- 2.9 Within the eastern wing, the ground floor currently provides three flats, originally designed as one single-bedroom and two two-bedroom units, each with a scullery and a bathroom. This was modified in the 1920s, linking two of the units to provide a three- bedroom flat with a larger

entrance hall. At first, this provides three two-bedroom flats numbers. The balcony access was originally completely open but later a translucent roof was installed and remains in situ.

- 2.10 Within the main wing/body of the site, on the south side, are two two-bedroom flats, one with access from the first floor courtyard.

b. The Surrounding Area

- 2.11 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

- 2.12 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

a. Closure of Belsize Fire Station

- 3.1 On 12 September 2013 the London Fire and Emergency Planning Authority approved the Fifth London Safety Plan (LSP5). LSP5 outlines a wide range of policies and measures which are intended to improve the safety of Londoners. Amongst other things, the document set out proposals to find significant cost savings over the next two years. Part of those measures reviewed the Authority's largely freehold estate comprising 112 stations, characterised by a significant number of ageing buildings; a third of which were listed and in need of repairs and improvements. 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). It was determined that some of the estate would be released.



LSP5

- 3.2 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.
- 3.3 The Belsize Park area is now served by the Kentish Town and West Hampstead Stations.

b. Planning History

- 3.4 In February 2016, Vulcan Properties submitted planning application 2016/0745/P and Listed Building application 2016/1128/L which sought the '*part change of use of the former fire station to provide 11 self-contained residential units including replacement single storey side extension to the east elevation and erection of two single storey side extension to the west elevation and insertion of roof dormers, with associated external alterations, landscaping and parking*'. The applications were referred to the Camden Planning Committee on 29th September 2016 where they were resolved to grant subject to the completion of a Section 106 Legal Agreement.
- 3.5 In recommending the applications for approval, officers stated within their report to committee that '*the proposal to convert a vacant Grade II* listed fire station for residential use is welcomed by officers*'. *The proposal, providing 11 new residential units, with one affordable unit, in a sensitive manner, would preserve the important elements of the listed building. Officers considered that the public benefits of the proposal, including 11 new residential units whilst preserving a Grade II* heritage asset, outweighed the limited harm caused*'.

4.0 PRE-APPLICATION CONSULTATION/ STATEMENT OF COMMUNITY INVOLVEMENT

- 4.1 Prior to the submission of this application, the applicants 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 The consultations undertaken were in respect of the development site as a whole. Accordingly, in light of the extant consents under 2016/0745/P and 2016/1128/L, the following section focuses on discussions in respect of the parts of the building for which Listed Building Consent is now sought only.

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.
- 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). Written advice was provided by Camden Council on 18 September 2015, with additional detailed advice specific to the physical changes proposed to the listed building provided by Historic England on 09 July 2015.
- 4.6 Given the minimal intervention proposed in converting and refurbishing the 7 flats in question, no significant comments were provided.

b. Local Community

- 4.7 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.
- 4.8 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.
- 4.9 Approximately 30 persons attended the consultation.
- 4.10 Overall, the feedback received was extremely positive with a number of residents acknowledging that the development appeared modest and sympathetic to the host.
- 4.11 The one main concern raised by residents was that the development should not cause any impact on existing on-street parking stress. In summary, the approved development for 11 flats is served by 11 parking spaces on site. The 7 additional units sought under this current application are not provided within any parking on site. Future residents may avail from on-street parking permits should capacity allow.

5.0 THE PROPOSED DEVELOPMENT

5.1 Please refer to the **Design and Access Statement** submitted herewith, which provides a detailed description of the development sought. This should be read alongside the **Heritage Statement**, prepared by DLG Architects. We provide a summary below.

5.2 In terms of land use, the proposed development seeks the change of use of the former fireman's living quarters from Sui Generis, to Use Class C3, self-contained flats. With regard to physical works, these are minimal and involve internal works only;

a. Eastern Wing - Ground and First Floor

5.3 The eastern wing has a raised ground floor with a balcony accessed from steps up from the western end, and the first floor above it, again with a balcony access but this time accessed from the central staircase within the main body of the building.

5.4 The raised ground floor element currently provides three flats, originally designed as 1no. single-bedroom unit and 2no. two-bedroom units, each with a scullery and a bathroom but later modified (c.1920s) linking two of the units to provide a three-bedroom flat with a larger entrance hall. It is proposed to divide this flat, returning the space to 2no. two-bed self contained flats.

5.5 The first floor currently provides three two-bedroom flats. This area contains proposed flat numbers 15, 16, and 17.

5.6 On the ground floor and first floors the originally designed plan of a two bedroom flat to each bay of the existing structure is retained. Much of the layout of the existing flats is retained, together with some minor alterations in layout to produce improved bathrooms and kitchens to modern standards.

b. Main Wing - First floor

5.7 On the south side of the main wing/body of the building were 2no. two-bedroom flats, one with access from the courtyard, and one with direct access from the staircase. It is proposed to amalgamate these small flats creating 1 larger 2 bed unit. The main entrance will be directly off the main staircase and the other original entrance door will be retained to provide access to the first floor courtyard.

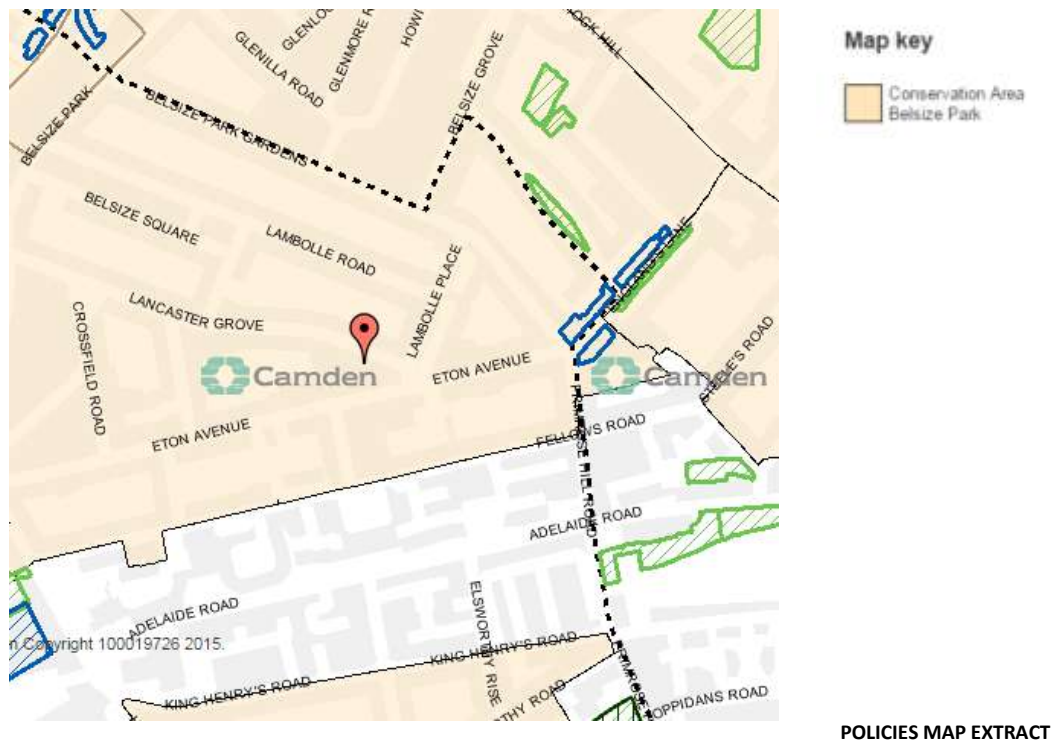
5.8 The western most flat has an inappropriate fire place inserted and is proposed to be removed and replaced with one more appropriate.

5.9 More generally, the finishes will retain the simple range which is typical of the buildings at present, comprising plastered and painted walls with simple painted joinery.

5.10 The external form of the building is unchanged, the only exception being the provision of a new cycle storage facility for 14 bicycles in the south west corner of the site serving the 7 flats, further details of which are proposed to be secured by way of a prior occupation condition attached to any forthcoming consent.

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.



- 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
 CGP2 – 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;
- Amenity;
- Transport;
- Sustainability;
- CIL;
- S106 contributions.

7.0 PLANNING ASSESSMENT

a. Land Use

- Loss of Existing 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.

- Proposed Use

7.10 Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. The proposal would provide 7 x 2 bed additional units on site. As such the

provision of new residential accommodation is compliant with policies CS6 and DP2 as long as it meets the Council's residential development standards and does not harm the amenity of existing and future occupiers. This is also subject to appropriate physical alterations being made to the Grade II* listed building to accommodate residential use.

- 7.11 The principle of the proposed change of use has been accepted under planning application 2016/0745/P, granted earlier this year for the part change of use of former fire station (Sui Generis) to provide 11 self-contained residential units (Class C3) including replacement single storey side extension to east elevation and erection of two single storey side extensions to west elevation and insertion of roof dormers, with associated external alterations, landscaping and parking.
- 7.12 In preparing this application, the applicants have had regard to 'London's Historic Fire Stations' a guidance document jointly produced by English Heritage (now Historic England) and London Fire Brigade.
- 7.13 The document provides guidance on the appropriate future use of London's Fire Station's, including Belsize Park.
- 7.14 The guidance advises that local authorities should seek to preserve the significant qualities of the buildings. In particular and of relevance to the proposals, the guidance asks;



LONDON'S HISTORIC FIRE STATIONS

- a. 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.
 - b. Can the former residential entrance be reused for the upper floors?
 - c. 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?
 - d. 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?
- 7.15 In response, the proposed works seek to secure the following:

- a. The upper floors that are the subject of this application were originally designed as flats for firemen. The proposed seeks to respect the original details such as plan form, together with the residential use, albeit Use Class C3.
- b. The former residential entrances are to be reused for the upper floors.
- c. There have been few historic alterations. Where evident, these are proposed to be 'unpicked' to reinstate special interest, e.g. the unsympathetic fireplace at first floor, main wing.
- d. 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 2 beds units.

b. Provision of Housing

- 7.16 The proposed development seeks to provide 7 additional self-contained flats and therefore complies with the aspirations of policy DP2 (and CS6).

- Dwelling Mix

- 7.17 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

- 7.18 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.
- 7.19 The proposed mix comprises 7 x 2 beds which accords with policy expectations.

- Affordable Housing

- 7.20 Policy DP3 expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. The Council will seek a target of 10% of the total housing floorspace to be affordable on this site. Policy DP3 also recognises factors relating to the individual circumstances of a site taking account of site costs and constraints, the availability of public subsidy, financial viability and other scheme requirements that will affect the scale, nature and location of affordable housing. Where a proposal does not meet the affordable housing target submission of a financial viability appraisal will be required to justify the lower proportion proposed.
- 7.21 Under planning consent 2016/0745/P, which granted 11 flats, the applicant agreed to provide an affordable unit in accordance with policy. The applicant has provided Unit 4 at lower ground floor level as the affordable unit, provided as an intermediate rented unit. Further to this, paragraph 3.11 of policy DP3 states that:

"The Council will seek to prevent a succession of related proposals that fall just below the capacity threshold of 10 dwellings or 1,000 sqm (gross). We will seek legal agreements to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components. If appropriate, the Council will use legal agreements to ensure that the affordable

housing contribution is triggered by the phase that brings the cumulative housing total to 1,000 sums (gross), and increases in accordance with the final cumulative housing total after a specified period."

- 7.22 Due to the fact that the above proposal sought to change the use of only part of the building, the applicant agreed to enter into a legal agreement which ensured that, should the remaining part of the building – i.e. the current application – change use to residential, the applicant would provide an affordable housing contribution in accordance with a single assessment of the whole site, which would be above the 10 unit threshold for affordable housing.
- 7.23 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).
- 7.24 The proposed development of 7 units (+ 11 units approved) is expected to contribute a total of 18% of the units as affordable housing.
- 7.25 Given the listed status of the building and the relatively low number of units required, an off-site contribution towards affordable housing is preferable. The applicants await officer advice in this regard.
- Lifetime Homes and Wheelchair Housing
- 7.26 From 1st October 2015, LPA's no longer apply Lifetime Homes.
- 7.27 10% of the homes should either meet wheelchair housing standards or be easily adaptable to meet the standards. The historic fabric of the grade II* listed building is a priority. Accordingly, it has not been possible to provide wheelchair access to the flats proposed due to the significant works that would be required to the building fabric.
- Residential Development Standards
- 7.28 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.
- 7.29 In light of the grade II* listed nature of the building, the applicants have taken a fabric first approach to any alterations sought. Notwithstanding this, all 7 flats have been designed to comply with the minimum internal space standards where feasible.
- 7.30 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. In summary, The internal planning of rooms responds to the building and achieves BRE recommended or equivalent values, in all but one location. This is a very good outcome within a listed building and as the BRE guidelines confirm, numerical values are not the only factor to consider. The outcome is BRE compliant. Despite the constraints imposed by location and the listed building sunlight availability would satisfy both BRE and London Plan criteria.
- Amenity Space
- 7.31 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.

- 7.32 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

- 7.33 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 building's, 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.
- 7.34 Historic England has also produced a relevant guidance document titled 'London's Historic Fire Stations'.
- 7.35 The applicants have consulted closely with Historic England (HE) prior to the submission of this application.
- 7.36 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;
- 7.37 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.
- 7.38 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.
- 7.39 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.
- 7.40 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.
- 7.41 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.

- 7.42 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. Neighbouring Amenity

- 7.43 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, overlooking, noise etc.
- 7.44 The closest neighbouring residential units are located at 22 Eton Avenue and 34 Lancaster Grove. As no external changes are proposed, and given the residential use proposed, it is considered there will be no impact on neighbouring amenity.

e. Transport

- 7.45 Under Policy DP18, the Council will expect development to be car free in areas within Controlled Parking Zones and easily accessible by public transport. 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.
- 7.46 Planning permission 2016/0745/P grants 11 units at the site. These 11 units are served by the 11 spaces available on site. The additional 7 units will not benefit from on-site parking.
- 7.47 The site is located in the Belsize controlled parking zone. Should capacity allow, it is expected that future occupants would be able to apply for on-street parking permits. In that regard, the site frontage along Lancaster Grove is served by a long stretch of yellow zig zag lines which prohibit parking. These lines were in place to allow the free access of large fire tender trucks. However given that the fire station use has now ceased, there is potential to remove the lines and introduce some additional on-site parking capacity. It is proposed that this be formed as part of the planning permission, secured by s278 Agreement.



LANCASTER GROVE FRONTAGE

- 7.48 In addition, 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 as an alternative.
- **Cycle Parking**
- 7.49 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 14 spaces would be required, 14 covered and secure cycle stands are provided in a linear storage area set in the south west corner of the site, where current gated serves access to Eton Avenue – see drawing number 502.
- **Construction Management. Deliveries and Servicing**
- 7.50 A construction management plan has been secured under planning permission 2016/0745/P. 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**
- 7.51 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. This has been secured under planning permission 2016/0745/P.

f. Energy, Sustainability and Drainage

- **Energy and Sustainability**
- 7.52 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'.
- 7.53 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.
- 7.54 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.
- 7.55 Please refer to the Energy and Sustainability Reports, prepared by XC02, submitted herewith.
- **Drainage**
- 7.56 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.
- 7.57 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
- 7.58 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.
- 7.59 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.
- 7.60 We submit herewith a copy of the Council's completed surface water drainage proforma together with the approved services plan (drawing number 090B, approved under permission 2016/0745/P), which identifies the position and size of the storm cells proposed to serve the development site as a whole.
- g. CIL**
- 7.61 Given that the building is deemed to be occupied, and no additional floorspace is proposed as part of this application, the development would not be subject to the Mayor of London's CIL or Camden CIL. A completed CIL form is submitted as part of the application nonetheless.
- h. Possible S106 Contributions**
- 7.62 It has been confirmed that this development would be liable to make a contribution towards affordable housing provision. Additional contributions that may be sought are as follows. Further advice is awaited from Camden officers in this regard.
- Car capped
 - Highways contribution
 - Energy Efficient and Renewable Energy Plan
 - Sustainability Plan

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 Planning permission was granted earlier this year (2016/0745/P) for the part change of use of former fire station (Sui Generis) to provide 11 self-contained residential units (Class C3) including replacement single storey side extension to east elevation and erection of two single storey side extensions to west elevation and insertion of roof dormers, with associated external alterations, landscaping and parking.
- 8.7 The proposed development now sought seeks to convert the remaining vacant parts of the building to create a further 7 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.
- 8.8 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.
- 8.9 An appropriate contribution towards the provision of affordable housing will be made.
- 8.10 A fabric first approach has been taken given the listed status of the building. The proposed development provides 7 x 2 bed flats which accords with the Council's most pressing need for flats. All flats have been designed to meet minimum housing standards where possible. Communal amenity spaces are provided.
- 8.11 The site has an average PTAL. On-street parking may be achieved together with potential to increase overall on-street parking capacity through replacement of existing yellow zig zag lines on Lancaster Grove which served the former fire station use, for additional on-street CPZ parking bays.

- 8.12 The proposals have been designed to ensure that neighbouring amenity is not adversely harmed, particularly through potential loss of privacy or overlooking.
- 8.13 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.