

# **CAMDEN TOWN METHODIST CHURCH**

---

Supporting Planning Statement

**Resubmission of Planning Application  
2015/7007/P**

November 2016

---

# CONTENTS

<b>1.0 Introduction .....</b>	<b>2</b>
<b>2.0 Background to Proposals .....</b>	<b>4</b>
<b>3.0 Site and Surroundings .....</b>	<b>6</b>
<b>4.0 Planning History .....</b>	<b>10</b>
<b>5.0 The Proposals .....</b>	<b>15</b>
<b>6.0 Pre-Application Advice and Consultation .....</b>	<b>18</b>
<b>7.0 Planning Policy Overview.....</b>	<b>24</b>
<b>8.0 Planning Assessment .....</b>	<b>41</b>
<b>9.0 Conclusion.....</b>	<b>56</b>

**Appendix 1- The Church Perspective**

**Appendix 2- The Wesley Hotel Statement**

**Appendix 3- Decision Notice for application 2015/7007/P**

**Appendix 4- Officers Report for application 2015/7007/P**

**Appendix 5- Stockwell Church Evening Standard Article**

**Appendix 6- Full DP15 Response**

**Appendix 7- Confirmation that Camden Council accept revised design**

## 1.0 Introduction

- 1.1 This Planning Statement has been produced by CBRE Ltd to accompany planning and conservation area consent applications for alterations to the Camden Town Methodist Church to facilitate its use for retained worship space alongside a new hotel on the upper floors. The introduction of a social enterprise hotel on the upper floors will cross-subsidise the essential structural works to make good this community and heritage asset, and provide a retained, safe place of worship for the Church congregation.
- 1.2 Camden Town Methodist Church, ('the site') is in serious need of structural repair and refurbishment. The relationship between the Camden Town Methodist Church ('CTMC') and the Methodist International Centre Ltd, trading as TheWesley, a social enterprise hotel operator, represents an opportunity to save this building, which although not listed, is considered as a positive contributor to the conservation area in which it is located. In addition, these proposals will retain the building and provide a future for the church congregation and community. The background to the Camden Town Methodist Church, TheWesley and their shared ethos is described in more detail within Section 2.0 of this Statement.
- 1.3 This application is a resubmission of planning application Ref: 2015/7007/P, which was refused by Camden Council on 2 June 2016. The reasons for refusal can be found at Section 4.0 of the statement but in essence, the Council considered that the overall principle of the proposals was acceptable and that the application had addressed all relevant policy issues but in the absence of an acceptable design they could not support that submission. Since then, as detailed later in this Statement, the applicant and design team has worked in a collaborative way with officers at LB Camden to overcome the concerns which led to the refusal of application 2015/7007/P and to establish a design solution that they are able to support.
- 1.4 The description of development is:
- “Internal and external alterations to the existing place of worship (Class D1), including conversion of lower ground student accommodation (Class C2) to provide replacement worship space (Class D1) and flexible worship, community and ancillary hotel space at lower ground, a shared entrance at upper ground and 39 hotel bedrooms (Class C1) on upper floors, including a one storey (equivalent) extension, associated alterations to the main and side entrances and fenestration.”*
- 1.5 This resubmitted application provides a design solution that would enhance the character and appearance of the existing building and the surrounding Camden Town Conservation Area, whilst at the same time enabling essential structural repairs. The proposals consist of the retention of an appropriate level of worship space for the church congregation alongside flexible community space on the lower ground floor, and the introduction of a social enterprise hotel on the upper floors. A full description of the new proposals is provided in Section 5.0.
- 1.6 Over the course of both this application and the previous submission, the applicant and their development team have undertaken extensive pre-application discussions and consultation since October 2014. This has involved discussions with Camden Officers, local amenity groups and surrounding occupiers. Full details of the pre-application advice and consultation, a summary of feedback and the applicant's responses are set out in Section 6.0 of this Statement.
- 1.7 The proposals, the subject of this submission, accord with or address all key relevant planning policies and guidance (detailed in Section 7.0) and have responded to extensive

# 1.0 Introduction

---

feedback from Officers and the public consultation throughout the process. The compelling case for the proposals is set out in Section 8.0.

## Scope of Submission

- 1.8 This Planning Statement should be read in conjunction with other documents forming part of the same submission and comprise:
- Completed Planning Application and Conservation Area Consent Form, including completed Certificate A (new forms submitted);
  - Completed CIL Additional Information Form (new forms submitted);
  - Planning Drawing Package which includes the site location plan, existing, for demolition and proposed plans and existing and proposed elevations and sections prepared by Manolo & White (new Drawing Package submitted);
  - Design and Access Statement prepared by Manolo & White (including structural report and conservation statement) (updated for current application);
  - Draft Construction Management Plan, including draft Construction Management Transport Plan, prepared by Morgan Tucker (updated for current application);
  - Draft Hotel Operators Management Statement prepared by TheWesley (updated for current application);;
  - Heritage Statement prepared by Heritage Collective (updated for current application);
  - Daylight/Sunlight Assessment prepared by Behan Ltd
  - Sustainability/BREAAM Assessment prepared by CBRE ;
  - Noise Impact Assessment prepared by CSG Acoustics;
  - Phase 1 Preliminary Risk Assessment ; and
  - Policy DP1 Feasibility and Viability Report (redacted) by TheWesley (updated for current application).
- 1.9 It should be noted that as a re-submission of an application refused less than 12-months previously, this application does not incur a new application fee.

## 2.0 Background to Proposals

### THE CAMDEN TOWN METHODIST CHURCH

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

**Table 2.1**  
CTMC Membership

	1985	1995	2005	2015
<b>MEMBERSHIP</b>	25	31	38	38
<b>COMMUNITY ROLL</b>	103	85	60	49

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

### The Church Building

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

## 2.0 Background to Proposals

site remains under the ownership of CTMC; something which is not always possible or viable in redevelopment proposals. This was evidenced in the breakdown in the relationship between the Church and the developer in previous pursued proposals (see Section 4.0 – Planning History).

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

### TheWesley

- 2.10 The Methodist International Centre was founded as a self-funding social in 1998, rebranding to TheWesley in 2013. It operates using an ethical business model, transforming under or unused Methodist premises back into viable community assets.
- 2.11 TheWesley’s pilot project is TheWesley in Euston, which offers 100 4\* rooms and conference facilities, predominantly for use by visiting academics and students. Any surplus funding from this hotel is used to provide bursaries and other support for educating young people in the UK. This contributes to the wider social enterprise, which has so far supported 10,000 students all over the UK. The model has already been successfully implanted at an operational level in Rome for over a year, and has been accepted at the planning stage in Birmingham.

### The relationship between CTMC and TheWesley

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

## 3.0 Site and Surroundings

### THE SITE

- 3.1 The site comprises 89 Plender Street, and is almost entirely occupied by the Methodist Church building.
- 3.2 The Church is situated on the southern side of Plender Street to the west of Camden High Street. It is bound by King's Terrace to the west, a mixed use mews street. To the south it is bound by housing that extends from Bayham Street. Further residential dwellings are situated to the east.
- 3.3 The Church was constructed in 1889/1890 and currently comprises two main floors: the lower ground and upper ground. The entrance is located at street (ground level) and you must travel up or down to the appropriate floors of the building. The Church has an attractive classical style façade and pediment front and is noted in the Camden Town Conservation Area Appraisal and Management Strategy (2007) to make a positive contribution to the Conservation Area although Historic England has determined that the building is not of sufficient quality or historic interest to warrant statutory Listing and the building is not locally listed either
- 3.4 The main access to the Church is via a stepped entrance from Plender Street. There is a secondary side access from Kings Terrace. There is no parking provided on site, but the site has a Public Transport Accessibility Level (PTAL) of 6b (the highest accessibility level). It is approximately 0.1 miles north of Mornington Crescent tube station and 0.3 miles south of Camden Town tube station, both of which serve the Northern Line and together with the extensive local bus network and its stops on Camden High Street and other adjacent roads provide excellent connections to central London, the local area and access to wider national rail services.
- 3.5 The lower ground floor was last used as student accommodation, comprising of four studios. The area was deemed to be unsafe and unsuitable for habitation in 2008 and has not been used since. Many of the rooms now lie empty or serve as storage areas for the Church albeit the majority are affected by damp and water egress.
- 3.6 The main worship space is located on the upper ground floor. It is surrounded by a balcony/gallery which is again considered unsafe for the reasons set out in the Design & Access Statement that accompanies the application. The congregation are struggling to manage the Church premises, with much of the building beyond the worship area in disrepair. The Church currently serves as a place of worship for 38 members and Adherents. It also provides two Christian congregations, a Brazilian Church and a Korean Church with a place of worship.

### Structural Integrity

- 3.7 It should be noted that the building is no longer considered to be structurally sound. The rear wall has been supported by shoring for more than 10-years with the bulging out of the rear wall. This has occurred as a result of the wall having to support a buttress and chimney at a roof structure that is heavier than the supporting walls can sustain. The design of the existing church is such that there are no internal structures or supporting features to which the rear, or any wall, can be tied to structurally. As a consequence any repairs will require substantial under-pinning and an engineering approach to ensure the future structural integrity of the building.
- 3.8 The current measures were initially designed to be temporary but these have now been in place for over ten years as the Church has been unable to fund long term repairs. The

### 3.0 Site and Surroundings

shoring extends outside of land belonging to the applicant, meaning that much of the Church’s income goes towards paying for the rental of the frame and lease payments for the land on which it is anchored. This is not a sustainable solution and will eventually drain the Church of all funding resources, leaving a community and heritage asset empty and redundant to decay further until demolition is the only viable choice. In addition, the fact that the shoring sits on land in another parties ownership is such that should the existing lease and arrangements be terminated, with the land owner wishing to utilise the land for his own endeavours, the building would be deemed to be unsafe as soon as the shoring is removed.

- 3.9 Due to the structural issues highlighted both above and in the Design & Access Statement, many parts of the building are now unused due to safety reasons. This includes areas such as the lower ground floor.
- 3.10 It is therefore now a matter of urgency that the structural issues are addressed, in order to enable the buildings continued use as such, the proposed hotel use and the internal alterations proposed constitute enabling works that will allow for the structural improvements to the building to be made and protect its future.
- 3.11 The proposals will also be able to address other areas associated with its external appearance. Some of windows and doors are permanently covered by mesh screening. Those windows without this protection are generally shattered, and the building as a whole looks run-down and disused, as shown in the photographs below. As such, a viable plan for redevelopment needs to be put in place as a matter of urgency before its visual quality and physical structure deteriorates further.





### 3.0 Site and Surroundings

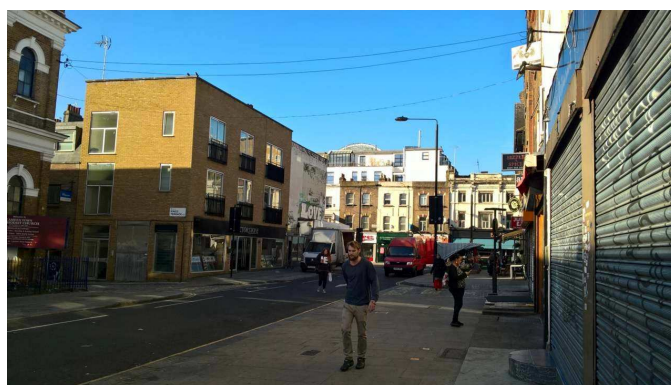
3.12 The building, however, does possess unique architectural features, including a course of white bricks detailing sponsors names and specific architectural detailing on the front of the building (as shown in the photographs below). The proposals will enable these features to be retained, whilst further enhancing the building’s existing character.



#### SURROUNDING AREA

3.13 The site is located within Camden Town Centre to the east of the main high street. It is surrounded by varied range of commercial, leisure, and comparison and convenience retail uses to the west and north.

3.14 On the northern side of Plender Street, opposite the site, are a series of smaller commercial units, including a variety of restaurants, a hairdressers and a nail salon. The southern side of Plender Street, to the west of the site are further commercial units, including an estate agent and a further restaurant. A small market occupies the west end of Plender Street, along St Pancras Way. This market contains 11 pitches and sells mainly curio items and second-hand clothing.



3.15 Immediately to the west of the site is Kings Terrace, which contains live/work units with commercial understood to be on the ground floor and residential above.

### 3.0 Site and Surroundings

---

- 3.16 To the east, Plender Street turns more residential in nature, comprising a series of housing estate of c. 4-5 storeys in height as well as traditional Victorian housing. A more modern housing estate (c. 1980) is located immediately to the south of the Church, also accessed via King’s Terrace.
- 3.17 In design terms, the building is situated within an area that consists of a wide range of architectural styles. It is larger in scale compared to adjoining properties, and possesses unique architectural features. As such, it is an important heritage and community asset, and there is considerable benefit in seeing it retained as a key anchor building within the surrounding streetscape. This provides further support for the necessary and pressing need for refurbishment of the building.



## 4.0 Planning History

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

### THE SITE

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

### Planning Application 2015/7007/P

- 4.9 In 2014 CBRE Planning was instructed by the Church to submit a proposal to facilitate its use as retained worship space alongside a new hotel on the upper floors. This came as a result of the Camden Town Methodist Church forming a relationship with TheWesley, a social enterprise hotel operator. The Church sees this partnership as an opportunity to save a rapidly deteriorating heritage asset, and provide a future for the church congregation,

## 4.0 Planning History

community and building. It also provides a preferable arrangement for retaining dedicated worship space; allowing the Church to retain freehold ownership but not having direct responsibility for its management or ongoing maintenance. In these ways it overcame the management issues associated with the previous application, and provides a viable and sustainable future for CTMC.

- 4.10 Following extensive pre-application discussions and consultation with Camden Officers, local amenity groups and surrounding occupiers, the application (ref: 2015/7007/P) was submitted in December 2015.
- 4.11 Despite continuing engagement with Camden Council following receipt of the consultation responses and responding to their concerns with revised design options for the roof extension, the application was refused planning permission on 2 June 2016. A copy of the Decision Notice and Officers Report can be found in Appendices 3 and 4. In summary, the reasons for refusal are as follows:
  - Reason for refusal 1: The proposed development by reason of its scale, bulk and detailed design would be an incongruous addition to the host building, harming the streetscape and detracting from the character and appearance of the Camden Town Conservation Area.
  - Reason for refusal 2: The proposed development, in the absence of a legal agreement for securing contributions towards offsite housing, the development would be likely to contribute to pressure and demand on existing housing in this area.
  - Reason for refusal 3: The proposed development, in the absence of a legal agreement for securing necessary contributions towards highway works would fail to make provision to restore the pedestrian environment to an acceptable condition.
  - Reason for refusal 4: The proposed development, in the absence of a legal agreement for securing contributions towards new or improved public open space, the development would be likely to contribute to pressure and demand on the existing open space in this area.
  - Reason for refusal 5: The proposed development, in the absence of a legal agreement for securing a travel plan, would fail to adequately promote the use of sustainable forms of transport.
  - Reason for refusal 6: The proposed development, in the absence of a legal agreement for securing a Hotel Management Plan, would be likely to generate adverse impacts upon the amenities of the area and neighbouring residential properties.
  - Reason for refusal 7: The proposed development, in the absence of a legal agreement for securing the submission and implementation of a Construction Management Plan, would be likely to contribute unacceptably to traffic disruption and dangerous situations for pedestrians and other road users and be detrimental to the amenities of the area generally.
  - Reason for refusal 8: The proposed development, in the absence of a legal agreement for requiring the development to incorporate sustainability measures to reduce carbon emissions and minimise use of energy, water and resources, would fail to be sustainable in its use of its resources and meet the challenge of climate change.
  - Reason for refusal 9: The proposed development, in the absence of a legal agreement for securing an energy efficiency plan including on-site renewable energy facilities,

## 4.0 Planning History

- would fail to be sustainable in its use of resources and fail to take sufficient measures to minimise the effects of, and adapt to, climate change.
- 4.12 It is important to note that with the exception of Reason 1, the remaining reasons for refusal establish that the relevant issues covered had been addressed and that had that application addressed the first reason then scheme would have been acceptable.
  - 4.13 This current application addresses the concerns raised in the December 2015 application (ref: 2015/7007/P) and addresses the issues raised in Reason 1 and resubmits updated material in respect to the issues covered by the other Reasons. It follows further consultation and advice from officers, and specifically the design has been amended to address the design and conservation officers concerns and therefore the reasons for refusal of the original proposals. This is explored further in Section 8.0.
  - 4.14 The main revision has focused on the architectural approach to the design of the roof. The scale, bulk and design have been reduced to provide a sympathetic addition to the existing building, enhancing the streetscape, and the character and appearance of the Camden Town Conservation Area. Further details regarding the design approach for the roof can be found in the Design and Access Statement.
  - 4.15 Details of materials to be used for the roof have been discussed between the architects and Council Officers, as to minimise the effect of the extension on the existing heritage building. Further details can be found in the Design and Access Statement.
  - 4.16 The new application specifically addresses the building's external architectural features. It identifies that the course of white bricks with sponsors names on and architectural detailing at the front of the building will be retained and refurbished as part of the scheme. For further details of specific improvements to exterior features, see the Heritage Statement.
  - 4.17 A more detailed description and explanation of the current proposals can be found in Section 5.0 of the report.

### SURROUNDING AREA

#### King's Terrace

- 4.18 The development at 11-19 & 23-31 Bayham Street and 8-24 Kings Terrace is of relevance to this scheme due to the potential of the proposals to impact upon the residential amenity of the occupiers. In 1993, permission was granted (ref: 9300539) for redevelopment to provide part 2-, part3-storey buildings on King's Terrace and Bayham Street, comprising 16 residential units, 8 parking spaces and garden area.
- 4.19 In January 2007, planning permission was granted (ref 2006/4922/P) at 26 King's Terrace for the change of use of ground floor from light industrial to a 1x2 bedroom self-contained flat with new lightwell and associated external alterations.
- 4.20 In June 2010, planning permission was refused (ref 2010/2036/P) at 37-39 King's Terrace for the change of use from office/workshop (B1) to three self-contained flats (C3) including creation of a new mansard roof, new courtyard, external and internal alterations. This was refused on the fact that the alterations were incongruous alterations to the site's mews character as well as lack of sufficient parking, absence of a car-free agreement and absence of payment for highway works.
- 4.21 In November 2010, planning permission was granted (ref 2010/3893/P) at 37-39 King's Terrace for the change of use from office (Class B1) to three flats with the erection of a mansard roof and alterations to the front elevation. This site is noted as having a positive

## 4.0 Planning History

contribution to the Camden Town Conservation Area. The original façade of number 39 was retained which was welcomed by the Camden Town Conservation Area Advisory Committee (CAAC).

- 4.22 A scheme was proposed in 2012 at 23-27 King's Terrace for the change of use and works of conversion from industrial (B2) to theatre (sui generis). This application (ref: 2012/5499/P) was refused due to concerns over residential amenity (Policy CS5 and Policies DP26 and DP28) and increase in car movements (contrary to Policy CS11 and policies DP16 and DP18). The Church proposals will be car free and thoroughly consider the criteria set out in Policy DP26. A Noise Assessment is also submitted to ensure the surrounding residential properties are not subject to unacceptable levels of noise.
- 4.23 The planning history of King's Terrace is useful precedent for the proposals as it ensures that they can overcome issues which have been raised before in relation to impact on residential amenity, parking, design and loss of particular uses.

### Other notable schemes in the surrounding area

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

### Other relevant church cases

- 4.25 There are a number of recent examples of churches across the country struggling to keep up with maintenance and essential repair work, putting their congregations at risk, as well as the future of the buildings themselves.

#### St Andrew's Church, Stockwell

- 4.26 A notable scheme within London is St Andrew's Church in Stockwell. Although not within the London Borough of Camden, it is undergoing a very similar structural deterioration to Camden Methodist Chapel. The church is not listed although it is within Stockwell Green Conservation Area, and thus is in a comparable situation to Camden Methodist Church.
- 4.27 A recent press release (found at Appendix 5) suggests that St Andrew's Church, and neighbouring Hammerton Hall, would need over £4 million spent on them to make them safe and watertight. However, this would still not bring them up to modern standards for use by the community. The Church of England, a church with considerably more accessible financing than the Methodist church, said that the St Andrew's Church was too expensive to repair, and local residents feared that the church will be demolished and replaced by flats.
- 4.28 This provides an example of the loss of a valuable community asset through lack of essential repair work. It eventually became too expensive to justify refurbishment, and there is a risk the Church will be demolished and whole site redeveloped, to the detriment of many from the local community.

#### Union Chapel, Islington

- 4.29 To draw upon an example of a successfully restored church, Union Chapel in Islington has recently been refurbished and redeveloped as a community and music venue whilst also retaining traditional worship space. Like CTMC, Union Chapel was in desperate need of structural repair. Over the past decade they have used the Heritage Lottery Fund, individual



## 4.0 Planning History

fundraising activities and the revenue from their music venue to fund essential repairs to the roof, windows and tower.

- 4.30 Despite being in a similar situation, it is unlikely that CTMC would be able to gain the funding needed, to completely restructure and refurbish the building and provide the Church with a sustainable future. The Grants for Places of Worship Lottery Fund provides £10,000 to £250,000 for urgent structural repairs to Grade I, II\* and II listed places of worship in England. Camden Town Methodist Church is not listed and thus is not applicable for this fund. Moreover the church cannot meet the qualifying requirements needed to qualify for Heritage Lottery Fund. Grant funding is only available up to a value of £250,000 (if the full amount were received). The cost of repairing the rear wall and other structural works to ensure the building is made structurally sound is conservatively estimated at £2.02 million (Cushman & Wakefield cost plan). Whilst this funding would be of assistance, there would still be a significant funding gap; for which the church cannot meet. On top of this, any fund value gained would have to be match funded by at least 5%. Camden Town Methodist Church would not be able to raise the remaining funds required. As such, the Heritage Lottery Fund is not a viable route in this instance.
- 4.31 Equally, to ensure that the building has a sustainable future the Church require a consistent income stream to meet ongoing maintenance costs. A number of alternative uses to the use of a hotel was suggested in the last submission but none of those would provide the up-front investment to address the underlying structural problems of the building. Further, there is no guarantee that establishing a music venue or other assembly type use here, similar to that at Union Chapel, would provide this. In fact, the venue at Union Chapel was forced to close for 3 years due to noise complaints, inadequate facilities and alcohol issues. In addition, current trends are such that assembly venues are closing due to environmental and safety reasons.

### St John, Hackney

- 4.32 St John is a Grade II Listed Church in Hackney, which prior to 2014 was in a dire state of structural disrepair. The congregation could not fund essential repairs, and if left untouched, the church was likely to become unsafe and unusable as a community and worship space.
- 4.33 The redevelopment, which was approved at planning committee on 7 May 2014, consisted of the demolition and redevelopment of the Rectory building, scout hut and former Learning Trust buildings to include 58 new homes and 1,120 sqm of community facilities. This redevelopment produced half the funds required to structurally repair and refurbish the Church. St John's Church applied to the Heritage Lottery fund in order to secure the remainder of the funding.
- 4.34 Unlike St John's, CTMC do not own any surrounding or ancillary buildings in order to enable residential development on-site. As such, hotel use was considered to be the most appropriate use to support the needs of the existing Church community by improving the structure of the existing building and re-providing enhanced community use, whilst also enhancing small scale visitor accommodation in Camden Town centre.

## 5.0 The Proposals

### OVERVIEW

- 5.1 The planning application proposes the partial change of use of the lower ground floor of the site to provide replacement worship space (D1), with flexible multi-purpose space for worship, community use and ancillary hotel use (39 hotel bedrooms distributed over the upper floors).
- 5.2 As detailed in the previous section, this application represents a resubmission of planning application 2015/7007/P.
- 5.3 The main amendment to the design is in relation to the roof extension. The scale, bulk and design have been revised as a sympathetic addition to the existing building and to further enhance the surrounding conservation area. Without this extension, the building would not provide enough floorspace for hotel uses to be viable at the site.
- 5.4 The application seeks permission for:
 

*“Internal and external alterations to the existing place of worship (Class D1), including conversion of lower ground student accommodation (Class C2) to provide replacement worship space (Class D1) and flexible worship, community and ancillary hotel space at lower ground, a shared entrance at upper ground and 39 hotel bedrooms (Class C1) on upper floors, including a one storey (equivalent) extension, associated alterations to the main and side entrances and fenestration”.*

### REDEVELOPMENT

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

### PROPOSED USE AND FLOORSPACES

- 5.6 The existing and proposed floorspace by use are detailed in Table 5.1.



## 5.0 The Proposals

**Table 5.1**  
Existing and Proposed Floorspace by Use

	EXISTING (GIA SQM)	PROPOSED (GIA SQM)
Student Accommodation (C2)	278	-
Church Use (D1)	473	114
Multi-Purpose Space	-	64
Shared Space	-	262
Hotel (C1)	-	942

- 5.7 The proposals provide CTMC with 114 sqm of dedicated worship space, which provides space for 63 members. This allows the current congregation to attract more members without providing too much space that the proposals become unviable.
- 5.8 The shared, multi-purpose space will be used as a breakfast room for the hotel guests, but will be available for church and community use for the remainder of the day.
- 5.9 The hotel provides 39 rooms, all of which are fitted with at least a double bed, a WC/shower room, a desk space and a storage unit. There are also four accessible rooms. The layout of all the rooms is designed to maximise efficiency. All rooms, apart from those on the fourth floor, will benefit from unique views onto the inside of the church, reminding guests of where they are staying and ensuring that the Church remains the centre of the proposals. Further to this, the rooms will all be finished with a simple pallet to reflect the values and philosophies of CTMC.

### EXTENSION AND EXTERNAL ALTERATIONS

#### Proposed Roof Extension

- 5.10 A one storey equivalent roof extension is proposed to the site (see proposed drawing pack). The extension is necessary to ensure that enough hotel rooms are provided to make the scheme viable.
- 5.11 The scale, bulk and design have been revised since the initial proposal, as a sympathetic addition to the existing building, enhancing the streetscape, and the character and appearance of the Camden Town Conservation Area. See below the change in design of the roof elevation from the initial application to the current one. The roof elevation has been significantly reduced for the current application.



Front elevation of refused application

## 5.0 The Proposals



Front elevation of current application

- 5.12 The extension is expressed as a corten steel mansard. The oxidised appearance will complement the tone of the existing brickwork and the setting of the building within its wider context. The Design and Access Statement provides more details of the materials used to ensure that the impact of the roof extension is minimal and remains subservient to the main Church building.

### Plender Street Elevation

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

### Kings Terrace Elevation

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

### Rear Elevation

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

## TRANSPORT AND ACCESS

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

## SERVICING, DELIVERIES AND WASTE MANAGEMENT

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

## 6.0 Pre-Application Advice and Consultation

### OVERVIEW OF PRE-APPLICATION ADVICE AND CONSULTATION

- 6.1 Since the partnership between TheWesley and CTMC has emerged, the applicant has sought pre-application advice from the London Borough of Camden (LBC) Officers, consultation with the surrounding occupiers and offered opportunities for discussion with Ward Councillors and the Camden Town Conservation Area Advisory Committee.
- 6.2 Detailed below is the pre-application advice sought since the inception of the project. Following the refusal of the application in June 2016, the applicant sought further advice as to clarify the reasons for refusal. This process began in August 2016 and concluded in November 2016.

### FORMAL PRE-APPLICATION FOR INITIAL APPLICATION

- 6.3 The following dates constitute the key milestones in the initial pre-application process:
  - 23 October 2014 – First pre-application meeting on-site with, then, Case Officer to discuss proposals;
  - 10 November 2014 - Receipt of formal pre-application response from Case Officer;
  - 21 May 2015 – Site meeting with new Case Officer and Design Officer;
  - 2 June 2015 – second pre-application meeting to discuss revised proposals with Case, Design and Conservation officers.
  - 23 June 2015 - Receipt of second formal pre-application response from Case Officer.
- 6.4 The pre-application advice resulting from the second pre-application meeting held on 2 June 2015 and subsequent design team response can be summarised below. This initial advice contributed to many of the early design decisions and is still relevant to the current proposals.

**Table 6.1**  
Pre-Application Comments and Responses

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

## 6.0 Pre-Application Advice and Consultation

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

## 6.0 Pre-Application Advice and Consultation

*disappointing in terms of the loss of historic fabric and radical changes to the main focal element of the frontage. However the existing change in levels in terms of access from the street to the church is understood to be complicated and obstructive particularly for those with mobility issues.*

*We therefore are able to support the removal of the steps and the reordering of the entrance. The details of the columns, windows, paving and front door will need to be agreed. A suggestion would be to use and re-lay the existing stone steps thereby retaining the existing material."*

*"We would like the front boundary enclosure to be retained."*

*"The proposal for the side door could be acceptable providing the design of the door and the details of the door opening are agreed. The proposal for the window is likely to be considered acceptable but the details of this will need approval"*

*"The proposed designs which bring the roof extension right up behind the front pediment and parapet would create an overwhelming and inappropriate bulk to the building's street frontage...*

*... is strongly recommended that if a roof addition is proposed, the maximum possible for this building would be a single addition. However it is expected that all sides of the roof extension should be set back from the elevations on all sides."*

*"Whilst the building is not listed, the interior is of considerable interest and we therefore ask that the interior is fully recorded as a building of local interest, prior to any demolition."*

*"The increase in size above that which exists on site has the potential to impact on the occupants of the nearest dwellings of King's Terrace and Camden Street through loss of outlook, sunlight and*

*for the church community and future hotel guests.*

- Further details on the new entrance are provided in the Design and Access Statement and elevation drawings.
- It is now proposed that the front boundary enclosure would be retained (see Drawing Pack).
- Further detail on the side door is provided on the King's Terrace elevation drawing.
- The pre-application submission proposed a double height roof extension.
- The height and massing of the proposed extension has now been significantly reduced during the design process.
- It has been minimised in height and set back from the building edge to reduce its appearance in views.
- See Design and Access Statement for further detail on design evolution.
- The interior will be fully recorded prior to strip out.
- A daylight and sunlight assessment has been prepared which accompanies the planning submission.

## 6.0 Pre-Application Advice and Consultation

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

## 6.0 Pre-Application Advice and Consultation

### PRE-APPLICATION FOR CURRENT APPLICATION

- 6.5 On 13 September 2016 a Pre-application Meeting was held on-site between the CTMC representatives and their advisors with the Southern Area Team Leader from the Development Management Team at LB Camden, together with the proposed Case Officer for this submission and the Council’s Design and Conservation Officer.
- 6.6 The main points discussed and responses to the issues raised at the pre-application meeting are detailed in the table below.

**Table 6.2**

Summary of pre-application meeting on 13/09/2016

ISSUES DISCUSSED
<b>Structural Stability of the Building</b>
The extent of structural damage to the building was discussed, and how these proposals were the enabler for the repairs necessary to preserve the building in the long term.
The use of an internal structure to the building will be required in order to achieve structural stability.
<b>Roof</b>
The relationship of the roof extension to the parapets and building edges. The bulk and massing of the roof as now proposed has, in principle, addressed the previous concerns and that this was helped by changing to a flat roof and moving the plant lower in the building.
The vertical articulation of the roof extension and its relationship to the building below.
<b>Windows</b>
It was clarified that the new floorplates would not be visible through the windows on the main elevation.
The stained glass windows are to be used internally to be enjoyed by the congregation of the church and residents of the hotel. They would not be fully appreciated outside due to the way the sunlight falls.
The grills over the windows detracted from the building and will be removed.
The inclusion of a light wash, LEDs to highlight the windows and reveals.
<b>Architectural Features</b>
The line of white bricks, which details the donations made to the church will be refurbished.
A Conservation Statement detailing the exterior features only and improvements to those or how the application will approach retention/reuse should be submitted with the application.
How the internal frame will seek to retain the original internal wall detailing and how this will be seen should be contained within the DAS.

- 6.8 The main amendments are focused on the design of the roof extension. The architect and the Council’s design officer have worked closely to develop a design that is acceptable and sympathetic to the heritage building and its surroundings.
- 6.9 Further attention will be given to the preservation of the building’s architectural features. The original internal wall and the unique line of white bricks on the western exterior wall will be retained. The style and material of the windows was also clarified, with the original stained glass windows to be used internally for the congregation to enjoy. Further details of the specific features to be retained can be found within the Design and Access Statement.

## 6.0 Pre-Application Advice and Consultation

---

- 6.10 The Case Officer confirmed on 20 October 2016 that the Council now consider the revised roof structure acceptable, as shown in Appendix 7. Minor concerns in relation to the proposed lift overrun and the lighting treatment of the windows have now been addressed. The lift overrun has now been reduced so it no longer affects the roofline or detracts from the roof profile.

### PUBLIC CONSULTATION

- 6.11 Detailed below is the public consultation activity undertaken by the applicant and The Wesley and relates to the original planning application. It was advised by Camden Council that a second public consultation for the resubmission would not be required. Since the initial public consultation no other comments have been received that have highlighted any issues that need to be addressed in this resubmission.

### Political Engagement

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

### Camden Town Conservation Area Advisory Committee

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

### Public Exhibition

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



## 7.0 Planning Policy Overview

### PLANNING POLICY FRAMEWORK

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

### DEVELOPMENT PLAN

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

### OTHER MATERIAL PLANNING CONSIDERATIONS

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

## 7.0 Planning Policy Overview

- 7.8 A detailed overview of the relevant planning policies applicable to these proposals is set out in this Section, with commentary on the interpretation of the policies and other material considerations, and how they apply to these proposals, set out in Section 8.

### CENTRAL GOVERNMENT GUIDANCE

#### National Planning Policy Framework (NPPF)

##### Presumption in Favour of Sustainable Development

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

##### Delivering Sustainable Development

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

##### Ensuring the Viability of Town Centres

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

##### Requiring Good Design

- 7.13 Well-designed buildings and places can improve the lives of people and communities (Para 8).
- 7.14 Section 7 of the NPPF requires good design in all development. Planning decisions should aim to ensure that developments (Para 58):
- Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
  - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
  - Respond to local character and history and reflect the identify of local surroundings and materials, while not preventing or discouraging appropriate innovation;

## 7.0 Planning Policy Overview

- Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
  - Are visually attractive as a result of good architecture and appropriate landscaping.
- 7.15 Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concern about incompatibility with an existing townscape, if those concerns have been mitigated by good design (Para 65).
- 7.16 Applicants will be expected to work closely with those directly affected by their proposal to evolve designs that take account of the views of the community. Proposals that can demonstrate this in development the design of the new development should be looked on more favourably (Para 66).

### Conserving and enhancing the Historic Environment

- 7.17 Section 12 sets out policy guidance in respect to conveying and enhancing the historic environment. In determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Para 128).
- 7.18 Para 131 sets out that in determining applications, LPAs should take into account:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic viability;
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 7.19 Proposals that preserve elements that make a positive contribution to or better reveal the significance of Heritage Assets (including Conservation Areas) should be treated favourably (Para 137).
- 7.20 Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm (and policies of paragraph 133 applied) or less than substantial harm (and policies of paragraph 134 applied), as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole (Para 138).
- 7.21 Accordingly, Para 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm or less is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
  - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

## 7.0 Planning Policy Overview

- the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.22 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal, including securing its optimum viable use (Para 134).
- 7.23 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (Para 135).

### STATUTORY DEVELOPMENT PLAN

#### Further Alterations to the London Plan (March 2016)

- 7.24 The London Plan sets out the Mayor’s vision until 2031 to:
 

*“excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change”.*
- 7.25 The objectives are to ensure London is:
  - A city that meets the challenges of economic and population growth;
  - An internationally competitive and successful city with a strong and diverse economy and entrepreneurial spirit;
  - A city of diverse, strong, secure and accessible neighbourhoods; and
  - A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.
- 7.26 In October 2016, the recently elected Mayor of London, Sadiq Khan, published a document entitled the ‘City for All Londoners’. The document acts as a ‘direction of travel’ for the key proposals to be included as part of the new London Plan, as well as outlining the challenges and opportunities that City Hall face across specific policy areas in order to secure positive growth for the city.

#### London’s Places

- 7.27 The London Plan’s focus for Inner London is to realise its potential in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, whilst improving the quality of life and health for those living, working, studying or visiting there (Policy 2.9).
- 7.28 London’s town centres should be the main focus for commercial development and intensification, including residential development beyond the Central Activities Zone (Policy 2.15). This policy outlines that development proposals within town centres should confirm with Policies 4.7 and 4.8 and:
  - a. Sustain and enhance the vitality and viability of the centre
  - b. Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations

## 7.0 Planning Policy Overview

- c. Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services
  - d. Be in scale with the centre
  - e. Promote access by public transport, walking and cycling
  - f. Promote safety, security and lifetime neighbourhoods
  - g. Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
  - h. Reduce delivery, servicing and road user conflict.
- 7.29 In the recent 'direction of travel' document the new Mayor recognises the cultural value of London. City Hall is to produce the world's first Cultural Infrastructure Plan' which will inform spatial and transport planning by summarising the city's cultural requirements to 2030. The document also acknowledges that more needs to be done to cater for the varying accommodation demands of tourists, and sets out a desire to increase hotel provision, principally in designated Opportunity Areas and town centres in Outer London.
- 7.30 The night-time economy is a key aspect of the capital's culture which the Mayor recognises is under threat. A range of measures are to be brought in to protect this. These include the appointment of a 'Night-time Czar' and putting the onus on residential developers to sound-proof new housing which is built near to established music and late-night venues; the 'agent-of-change' principle.

### London's Economy

- 7.31 The plan supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres (Policy 4.7). The scale of retail, commercial, cultural and leisure development should be related to the size, role and function of a town centre and its catchment. Development should be focused on sites within town centres, or if no in-centre sites are available edge of centre sites which can be well integrated with the existing centre and public transport should be considered.
- 7.32 The Mayor, boroughs and other stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision (Policy 4.5). Outside the CAZ, visitor accommodation should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to Central London and international and national transport termini. London should achieve 40,000 net additional hotel bedrooms by 2036 of which at least 10% should be wheelchair accessible.
- 7.33 In the recent 'direction of travel' document the Mayor acknowledges the challenges that the recent vote to leave the EU poses to city's economy. It is maintained within the document that London can continue to remain and flourish as a global economic centre. Some of the proposals which will help to secure this include:
- Resisting, unless justified, move from office to residential within Central London
  - Investment in infrastructure (transport, energy waste, green infrastructure amongst others)
  - Promoting viability strategic locations for office space across the city, including Outer London; and

## 7.0 Planning Policy Overview

- Supporting business, particularly small to medium sized, by protecting existing workspace where appropriate including workspace as part of new housing developments and ensuring that new commercial developments include affordable workspace.

### London’s People

- 7.34 London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population (Policy 3.16). Social infrastructure, defined in Annex Six, includes community facilities and places of worship. Policy 3.16 continues that development proposals which provide high quality social infrastructure will be supported in light of local and strategic infrastructure needs assessments. The suitability of redundant social infrastructure for other forms of social infrastructure of which there is a defined need in the locality should be assessed before alternative developments are considered. Facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.
- 7.35 Supporting paragraph 3.91 states that voluntary community groups often find it difficult to find premises suitable for their needs; unused or underused facilities should be brought back into use as much as possible to help their accommodation needs. The additional use or reuse of places of worship should be considered for the purpose of providing accommodation for use by other traditions or other faiths and/or wider community functions.

### London’s Response to Climate Change

- 7.36 The Mayor’s energy hierarchy is to:
- be lean, use less energy;
  - be clean, supply energy efficiently; and,
  - be green, use renewable energy (Policy 5.2).
- 7.37 The Mayor has set targets for carbon dioxide emissions reductions. Between 2013-2016, a 40 per cent improvement on 2010 Building Regulations will be sought for non-domestic buildings (Policy 5.2). Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions are to be met within the framework of the energy hierarchy. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu.
- 7.38 Targets are proposed for minimum improvements over the Target Emission Rate: 44% improvement on 2006 Building Regulations (residential and domestic buildings between 2010-2013). Where targets cannot be met on site any shortfall can be provided offsite or through payment in lieu.
- 7.39 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 7.40 Regard should be had to sustainable retrofitting of existing buildings. Opportunities for reducing carbon dioxide emissions from the existing building stock should be taken by identifying potential synergies between new developments and existing buildings through

## 7.0 Planning Policy Overview

the retrofit of energy efficiency measures, decentralised energy and renewable energy opportunities (Policy 5.4).

- 7.41 The Mayor’s objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to. The draft Minor Alterations to the London Plan Housing Standards and Mayor’s Draft Interim Housing SPG also give up to date guidance on London-wide targets/ requirements following the withdraw of the Code for Sustainable Homes into Building regulations.
- 7.42 The draft Minor Alterations to the London Plan Housing Standards continue to encourage developers to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy.
- 7.43 The key change is proposed alterations to LP Policy 5.2 in relation to reductions. The draft amended policy requires a 35% reduction on the 2013 Building Regulations between 2014-2016 (previously it was against 2010). There remains the requirement to achieve zero carbon developments from 2016 onwards. Draft policy 5.2 now also includes a statement setting out how these reductions should be achieved stating that in line with the energy hierarchy above, these targets should be met through a combination of energy efficiency measures on-site, and low and zero carbon infrastructure, either on or off-site, in line with the decentralised energy policies.

### London’s Transport

- 7.44 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 7.45 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 7.46 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in Table 6.3.
- 7.47 Maximum car parking standards are set out in Table 6.2. In addition, developments must ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.
- 7.48 In the Mayor’s ‘direction of travel document’, transport is a key element in order to improve connectivity and tackle the housing crisis. To deliver much needed housing, higher density development is to be encouraged around existing and proposed transport hubs. There is an indication that City Hall will seek to collaborate with neighbouring authorities in the South East to agree joint infrastructure investment corridors which will open up housing and other development beyond London’s borders. The Mayor is pressing for devolution of suburban rail services under his control, beginning with the Southeastern franchise in 2018.

### London’s Living Places and Spaces

- 7.49 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of “secured by design”(Policy 7.3).
- 7.50 Development should have regard to the form, function or structure of an area (Policy 7.4). In areas of poor character it should build on positive elements that can contribute to establishing character.

## 7.0 Planning Policy Overview

- 7.51 Development should make the public realm comprehensible with gateways and focal points (Policy 7.5).
- 7.52 Architecture should contribute to a coherent public realm, streetscape and wider cityscape (Policy 7.6). Buildings should:
- Be of the highest architectural quality;
  - Be of a proportion, composition, scale and orientation that enhances, activates and appropriately redefines the public realm;
  - Comprise details and materials that complement, not necessarily replicate the local architectural character;
  - Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;
  - Incorporate best practice in resource management and climate change adaptation and mitigation;
  - Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
  - Be adaptable to different activities uses, particularly at ground floor;
  - Meet the principles of inclusive design; and
  - Optimise the potential of sites.
- 7.53 New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail. It should make provision for the protection of archaeological resources (Policy 7.8).
- 7.54 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be “air quality neutral” and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 7.55 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).
- 7.56 In the ‘direction of travel’ document the Mayor specifies that housing is of top priority. To tackle the pressing issue of affordability, the Mayor is proposing a strategic, city-wide target of 50% of new homes built in London to be affordable. A ‘London Living Rent’ has also been established which provides a new definition for affordable rent. To deliver much needed housing, higher density development is to be encouraged around existing and proposed transport hubs.
- 7.57 However, it is not only central locations with access to major transport links where housing development is to be encouraged. City Hall is keen to see smaller-scale schemes delivered in appropriate suburban locations. The Mayor is also eager to work proactively with public sector bodies such as TfL and the NHS given they possess significant land holdings which could be used to deliver more housing. He has also indicated that appropriate landholdings of the Metropolitan Police be developed for housing.
- 7.58 Higher density development is supported, and sees tall buildings continuing to play a role for London. However, he sets out a course for his emerging stance being that tall buildings



## 7.0 Planning Policy Overview

will only be permitted if they can add value to the existing community – to make a contribution to the streetscape and skyline together with their effects on local daylight, wind turbulence, glare and noise. In addition to affordable housing, they will, where appropriate be expected to provide affordable workspace.

### Housing and Parking Standards Minor Alterations

- 7.59 The 2015-2016 Minor Alterations (MALPs) have been prepared to bring the London Plan in line with national housing standards and car parking policy. The Housing Standards Minor Alterations and Parking Standards Minor Alterations have been considered by an independent inspector at an examination in public and were published on 14<sup>th</sup> March 2016. Where relevant, revised parking standards are referenced within this Section of the Planning Statement.

### LB Camden Local Development Framework

#### Site Designations

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

#### Relevant Policies

- 7.61 The relevant policies from LBC Core Strategy (2011) comprise:
- CS1 (Distribution of Growth)
  - CS3 (Other highly accessible areas)
  - CS5 (Managing the impact of growth)
  - CS6 (Providing quality homes)
  - CS8 (Promoting a successful and inclusive Camden economy)
  - CS10 (Supporting community facilities and services)
  - CS11 (Promoting sustainable and efficient travel)
  - CS13 (Tackling climate change through promoting higher environmental standards)
  - CS14 (Promoting high quality places and conserving our heritage)
  - CS16 (Improving Camden’s health and well-being)
  - CS19 (delivering and monitoring the Core Strategy)
- 7.62 The relevant policies from LBC Development Policies (2010) comprise:
- DP1 (Mixed use development)
  - DP2 (Making full use of Camden’s capacity for housing)
  - DP9 (Student housing, bedsits and other housing with shared facilities)
  - DP14 (Tourism development and visitor accommodation)
  - DP15 (Community and leisure uses)
  - DP16 (The transport implications of development)
  - DP17 (Walking, cycling and public transport)

## 7.0 Planning Policy Overview

- DP18 (Parking standards and limiting the availability of car 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)
- DP29 (Improving access)
- DP31 (Open Space and Outdoor Recreation)
- DP32 (Air quality and Camden’s Clear Zone)

### Principle of development

- 7.63 The Council will focus Camden’s growth in the most suitable locations and manage it to make sure that its opportunities and benefits are delivered and that it is sustainable (Policy CS1, Distribution of Growth). Appropriate development will be encouraged at highly accessible locations including the town centres. The Council will seek to promote the most efficient use of land and buildings by seeking development that makes full use of the site, taking into account the quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Council will expect a provision of a mix of uses in suitable schemes, including an element of housing where possible. Policy SC6 (Providing quality homes) and Policy DP2 (Making full use of Camden’s capacity for housing) outline the Council’s aim to maximise its supply of housing and secure high quality affordable housing.
- 7.64 The Council will promote appropriate development in the highly accessible town centres (Policy CS3, Other highly accessible areas). These areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. The development in these areas will be of suitable scale and character for the area in which it is situated and should contribute to other Council aspirations. In relation to this, the Council will ensure that development meets the full range of objectives of the Core Strategy and other Local Development Documents (Policy CS5).
- 7.65 The Council will require a mix of uses in development where appropriate in all parts of the borough (Policy DP1, Mixed Use Development). Within town centres, where more than 200 sqm gross additional floorspace is provided, LBC will require up to 50% of all additional housing to be housing. The Council will require any secondary uses to be provided on site particularly where 1,000 sqm (gross) of additional floorspace or more is required. Where inclusion is appropriate but cannot be included on site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu. Policy CS19 (Delivering and monitoring the Core Strategy) states that the Council will use planning obligations, and other suitable mechanisms, where appropriate to support

## 7.0 Planning Policy Overview

sustainable development, secure necessary and related infrastructure, facilities and services to meet the needs generated by development, and mitigate the impact of development.

### Community Uses

- 7.66 LBC will ensure that community facilities and services are provided for people who work in and visit the borough (Policy CS10, Supporting community facilities and services). This includes providing a range of community facilities to support Camden's growing population. LBC will support the retention and enhancement of existing community, leisure and cultural facilities and will facilitate the efficient use of community facilities and the provision of multi-purpose community facilities at a single, accessible location.
- 7.67 Paragraph 10.12 specifically mentions faith facilities, and states that LBC should support community organisations and religious groups to help them meet their need for faith facilities.
- 7.68 Policy DP15 (Community and leisure uses) sets out that the Council will protect existing community facilities by resisting their loss unless:
- a. A replacement facility that meets the needs of the local population is provided or
  - b. The specific community facility is no longer required in its current use.
- 7.69 The policy continues that to help meet increased demand for facilities the Council will expect suitable developments to make rooms available for local community groups to use or hire at a discounted rate.

### Student Accommodation

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

### Hotels

- 7.71 Policy CS8 (Promoting a successful and inclusive Camden economy) recognises the importance of tourism as an employment generating use. The Council will support tourism development and visitor accommodation by allowing smaller scale visitor accommodation in town centres including Camden Town (Policy DP14, Tourism development and visitor accommodation). All tourism development and visitor accommodation must be easily reached by public transport, provide necessary off-highway pick up and set down points for taxis and coaches and not harm the balance and mix of uses in the area.
- 7.72 The Council will require all developments, including alterations and extensions to be of the highest standard of design (Policy DP24, Securing high quality design). LBC will expect developments to consider:
- a. Character, setting, context and the form and scale of neighbouring buildings;
  - b. The character and proportions of the existing building, where alterations and extensions are proposed;

## 7.0 Planning Policy Overview

- c. The quality of materials to be used;
- d. The provision of visually interesting frontages at street level
- e. The appropriate location for building services equipment;
- f. Existing natural features, such as topography and trees;
- g. The provision of appropriate hard and soft landscaping including boundary treatments;
- h. The provision of appropriate amenity space; and
- i. Accessibility.

7.73 Furthermore, Policy CS14 (Tourism development and visitor accommodation) requires development of the highest standard of design that respects local context and character, seeks the highest standards of access in all buildings and places and promotes high quality landscaping.

7.74 The Council will also seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities (Policy DP29, Improving access). All buildings will be expected to meet the highest practicable standards of access and inclusion and must be designed to be as accessible as possible.

### Heritage

7.75 Camden will preserve and enhance the borough’s rich and diverse heritage assets and their settings, including conservation areas (Policy CS14, Tourism development and visitor accommodation).

7.76 In order to maintain the character of Camden’s conservation areas, LBC will (of relevance to the proposals):

- a. Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b. Only permit development within conservation areas that preserves and enhances the character and appearance of the area; and,
- c. Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

7.77 Policy DP25 (Conserving Camden’s heritage) requires the preservation and enhancement of Listed Buildings, the maintenance of the character of Conservation areas, the protection of archaeological remains and the protection of other heritage assets such as Parks and Gardens of Special Interest.

### Impact on adjacent occupiers

7.78 Protecting high standards of amenity is a key element in maintaining Camden’s attractiveness as a place to live and work. The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity (Policy DP26, Managing the impact of development on occupiers and neighbours). The factors for consideration include visual privacy and overlooking, sunlight, daylight and artificial light levels and noise and vibration levels. Developments are also required to provide:

## 7.0 Planning Policy Overview

- a. Facilities for the storage, recycling and disposal of waste;
  - b. Facilities for bicycle storage; and
  - c. Outdoor space for private or communal amenity space, wherever practical.
- 7.79 Policy DP27 (Basement and lightwells) states that the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability.
- 7.80 Policy DP28 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is managed and control. The Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these oases are likely to cause harm, condition and planning obligations may be used to minimise impact.
- 7.81 Policy DP20 (Movement of goods and materials) seeks to minimise the movement of goods and materials by road, and the impacts that this would cause. The Council would expect development that would generate significant movement of good or materials both during construction and in operation to minimise the movement of goods and materials by road, and consider the use of more sustainable alternatives such as ail and canal links.

### Transport and Highways Impacts

- 7.82 The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links (Policy DP16, The transport implications of development). Safe pick-up and drop-off areas as well as waiting areas should be provided where this activity is likely to be associated with the development. The Council will resist development that would be dependent on travel by private motor vehicles (Policy DP17, Walking, cycling and public transport).
- 7.83 The Council will seek to ensure that developments in town centres are car free (Policy DP18, Parking standards and limiting the availability of car parking). For car free proposals the Council will limit onsite parking to spaces for disabled people and operational or servicing needs. Developments will also be expected to meet the minimum standards for cycle parking.
- 7.84 Policy DP21 (Development connecting to the highway network) states that the Council will expect developments connecting to the highway network to:
- a. ensure the use of the most appropriate roads by each form of transport and purpose of journey, in accordance with Camden's road hierarchy;
  - b. avoid direct vehicular access to the Transport for London Road Network (TLRN) and other Major Roads; and
  - c. avoid the use of local roads by through traffic.
- 7.85 The London Plan standards are considered to supersede these.
- 7.86 Policy CS11 (Promoting sustainable and efficient travel) states that the Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network.

## 7.0 Planning Policy Overview

### Sustainability and climate change

- 7.87 The Council will require all development to take measures to minimise the effects of and adapt to climate change (Policy CS13, Tackling climate change through promoting higher environmental standards). All development is encouraged to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.88 Schemes must demonstrate how sustainable development principles have been incorporated into the design proposal and proposed implementation (Policy DP22, promoting sustainable design and construction). Developments of over 500 sqm should achieve a “very good” BREEAM assessment until 2016.
- 7.89 The Council will require developments to reduce their water consumption, the pressure on the combined sewer network and risk of flooding (Policy DP23, Water) by:
  - d. incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site;
  - e. limiting the amount and rate of run-off and waste water entering the combined storm water and sewer network through the methods outlined in part a) and other sustainable urban drainage methods to reduce the risk of flooding;
  - f. reducing the pressure placed on the combined storm water and sewer network from foul water and surface water run-off and ensuring developments in the areas identified by the North London Strategic Flood Risk Assessment and shown on Map 2 as being at risk of surface water flooding are designed to cope with the potential flooding;
  - g. ensuring that developments are assessed for upstream and downstream groundwater flood risks in areas where historic underground streams are known to have been present; and
  - h. encouraging the provision of attractive and efficient water features.
- 7.90 Development that is located in areas of poor air quality will be expected to deploy mitigation measures to limit harm to air quality (Policy DP32, Air quality and Camden’s Clear Zone). Policy CS16 (Improving Camden’s health and wellbeing) also states that to improve health and well-being with the borough, the impact of poor air quality on health must be recognised. As a result, Camden’s Air Quality Action Plan which aims to reduce pollution levels must be implemented.
- 7.91 The Council will only grant permission for development that is likely to lead to an increased use of public open space, where an appropriate contribution to the supply of open space is made (Policy DP31, Open space and outdoor recreation).

### EMERGING DEVELOPMENT PLAN

- 7.92 Emerging policy also has the ability to be considered as a ‘material consideration’ in the determination process but this depends on the stage it has reached in the adoption process.

### Camden Draft Local Plan (2016-2031)

- 7.93 At local level, Camden Council submitted their emerging Local Plan and supporting documents to the Secretary of State for Communities and Local Government for independent examination on 24 June 2016. Prior to this, consultation on the Local Plan Submission Draft ran for 8 weeks from 8<sup>th</sup> February 2016 to 4<sup>th</sup> April 2016. Public hearings are due to take place throughout October 2016. It is predicted than the Inspectors Report

## 7.0 Planning Policy Overview

should be released in Winter 2016 and that adoption could take place in Winter 2016 or early 2017.

- 7.94 The Camden Draft Local Plan is considered at a more advanced stage in its adoption process to where it was for the initial application (ref. 2015/7007/P) in 2015. The current proposals are still to be assessed against the existing adopted policies however below is a brief summary of the relevant emerging policy. There is a chance that the below emerging policy may be considered as a ‘material consideration’ in the determination process.

### Principle of Development

- 7.95 The Council will continue to focus Camden’s growth in the most suitable locations. This is likely to involve supporting development that makes best use of the site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility, as well as any other relevant considerations (Policy G1, Delivery and location of growth). It is specifically noted that good design can increase density while protecting and enhancing the character of an area. All development should be of excellent design quality and should sensitively consider the amenity of occupiers and neighbours and, particularly in conservation areas, the character, heritage and built form of its surroundings.
- 7.96 Policy G1 (Delivery and location of growth) specifically identifies Camden Town as a high accessible location where the most significant growth is expected to be delivered. Throughout the life of this plan, Camden Town Centre is identified for a significant amount of additional shopping floorspace.
- 7.97 The Draft Local Plan (2016-2031) seeks to further maximise the supply of self-contained housing through mixed use schemes. All proposals for new build non-residential development or extensions involving a significant floorspace increase should provide self-contained housing on-site, particularly where 1000 sqm of additional floorspace or more is proposed (Policy H2, Maximising housing supply).
- 7.98 Where the Council is satisfied that providing housing in association with the development is appropriate but on-site housing is not practical, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu (Policy H2).

### Community Uses

- 7.99 Camden’s Community Investment Programme is detailed within the Draft Local Plan as an important feature of Camden’s expected growth within the plan period. The CIP works to ensure that the Council makes the best use of its property assets through regenerating sites and selling those sites surplus to requirements. Key spatial areas of focus are Gospel Oak, Somers Town and Camley Street.
- 7.100 Policy C2 (Community facilities, culture and leisure) recognises the importance of not only ensuring the provision of community facilities, but ensuring these facilities are modernised to meet the changing needs of the community and continuing to resist their loss. This policy will facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community.

### Student Accommodation

- 7.101 The Council will continue to resist the net loss of student accommodation (Policy H9, Student housing) unless either:

## 7.0 Planning Policy Overview

- i. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or
- j. adequate replacement accommodation will be provided;
- k. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

7.102 Where the Council is satisfied that a development involving the loss of student housing is justified, they will expect it to create an equivalent amount of floorspace in another permanent housing use.

### Hotels

7.103 Policy E3 (Tourism) identifies smaller-scale visitor accommodation in the town centres including Camden Town. Like in the existing Development Plan, all tourism development and visitor accommodation must be easily reached by public transport, provide necessary pickup and set down points for taxis and coaches and not harm the balance and mix of the area.

### Design

7.104 The Council will seek to secure high quality design in development that respects local context and character, preserves or enhances the historic environment, is sustainable in design and construction, of high quality and which integrates well with the surrounding streets and open spaces (Policy D1, Design).

7.105 The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

### Heritage

7.106 The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas (Policy D2, Heritage).

7.107 The Council will:

- a. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- b. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- c. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area;

### Impact on adjacent occupiers

7.108 The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity (Policy A1, Managing the Impact of development).

### Transport and Highways Impacts

7.109 The Council will promote sustainable transport throughout the borough by prioritising walking, cycling and public transport (Policy T1, prioritising walking, cycling and public



## 7.0 Planning Policy Overview

---

transport). All new developments within the borough are now required to be car-free (Policy T2, Car-free development and limiting the availability of parking).

### **Sustainability and climate change**

- 7.110 The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation (Policy CC1, Climate change mitigation).
- 7.111 All development should adopt appropriate climate change adaption measures such as the protection of green spaces and promotion of new green infrastructure, increasing permeable surfaces to limit surface water, the incorporation of bio-diverse roofs and measures to reduce the impact of urban and dwelling overheating (Policy CC2, Adapting to climate change).

## 8.0 Planning Assessment

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

### PRINCIPLE OF REDEVELOPMENT

- 8.3 Camden Town Methodist Church is in desperate need of structural repair and refurbishment (see Design and Access Statement and the appended structural report). The costs of maintaining the Church have become too high for CTMC to sustainably continue to manage. The lack of a good quality facility also means that CTMC cannot attract new members (see Section 2).
- 8.4 The CTMC has considered options for redeveloping the site to avoid it becoming an unusable, vacant building. Without significant repair, it is considered that the membership will continue to decline and it is likely that the Church will close within a decade and the building itself will deteriorate to such a degree that it will be deemed 'unsafe'.
- 8.5 The congregation and the Islington and Camden Mission Circuit are not in a financial situation to enable the Church to redevelop the site without substantial external funding. As explained in Section 2, The CTMC and The Wesley have entered a partnership to introduce hotel uses into the existing church building, alongside a retained element of church and community space on the lower ground floors, to cross-subsidise the necessary significant structural works to the Church and introduce a long-term revenue stream.
- 8.6 The Church cannot physically or viably be reused in its existing condition. Significant repair works are required; albeit the applicant has sought to achieve these within the existing fabric of the building insofar as possible. In addition to the creation of additional floors within the existing building envelope through the introduction of a new internal concrete frame, a one storey (equivalent) extension is required in order to provide sufficient floorspace for the church and a viable hotel. The scheme results in a net uplift in GEA floorspace of 576sqm.
- 8.7 The NPPF, London Plan and Camden's policies, inter alia, direct the effective use of brownfield land, support social and cultural facilities and protect heritage assets in a manner appropriate to their significance.

## 8.0 Planning Assessment

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

### LAND USE

#### Reduction in quantum of community (D1) floorspace

- 8.9 The redevelopment of the Church results in an overall loss of community (D1) floorspace. The existing site provides 473 sqm (GIA) of dedicated worship space, whereas the proposals provide 114 sqm of dedicated worship space as well as 64 sqm (GIA) of multi-purpose space for use by both the church and community. This provides a total of 178 sqm (GIA) of D1 space.
- 8.10 Overall there is a net loss of 295 sqm of community (D1) floorspace. The NPPF, London Plan and Camden policies seek to protect community floorspace. Notwithstanding this and as set out in Section 7, the NPPF and statutory development recognise the challenges faced by community facilities and that their re-use and/or release should be managed. Camden Development Management Policy DP15 sets out policy in respect to the loss of existing community facilities. Core Strategy Policy CS10 and London Plan Policy 3.16 are also relevant in relation to community facilities and social infrastructure. See below for justifications of these policies in relation to the current proposal.

#### Core Strategy Policy CS10

- 8.11 Policy CS10 (Supporting Community facilities and services) specifically sets out that the Council will 'support the retention and enhancement of existing community...facilities' and 'facilitate the efficient use of community facilities and the provision of multi-purpose community facilities that can provide a range of services to the community a single, accessible location.' Moreover, the London Plan recognises that the additional use or reuse of places of worship should be considered for the purpose of providing accommodation for use by other traditions or faiths and/or wider community facilities (London Plan Para 3.91).
- 8.12 One of the key objectives of Camden's Core Strategy is to support and encourage the provision of facilities and services needed to meet the needs of Camden's communities (Core Strategy paragraph 32). In specific reference to religious groups, Camden Council seeks to help them find space to meet their need for faith facilities (supporting paragraph 10.12 of Core Strategy Policy CS10).
- 8.13 178 sqm (GIA) of D1 floorspace is re-provided in the proposals. This is comprised of an area of dedicated worship space (114 sqm) providing worship space for up to 63 people and a further multi-purpose space (64 sqm) to be available for use by both the church and community; with the potential for expansion into the shared space should the Church membership increase.
- 8.14 By re-providing dedicated worship space the proposals will continue to support the CTMC. In addition, the proposals will enable space within the existing building to be made available to the wider community in accordance with the London Plan and Camden Policy CS10. The Officers Report states that the proposal would protect existing community facility and re-provide enhanced community facilities and as such, the principle of use is considered to be acceptable by Camden Council (see Paragraph 2.8)

## 8.0 Planning Assessment

### Development Management Policy DP15

- 8.15 The area of existing D1 space is 473 sq m (the current inefficient use of this space is described below). The proposals seek to retain 37% of the existing community floorspace (114 sq m as dedicated worship space and 64 sqm as multi-purpose space that will be available to wider community groups in new modern, safe facilities with appropriate sanitation facilities). There is a further 262 sqm of shared space, for use by the congregation, community and hotel guests, however this is not classed as D1 space.
- 8.16 Development Management Policy DP15 (Community and leisure uses) sets out policy in respect to the loss of existing community facilities.
- 8.17 The proposals are not considered to constitute the loss of an existing community facility, as explained in the Planning Statement, but rather to introduce a hotel and ancillary uses to serve as the enabler to facilitate the necessary repairs to the building.
- 8.18 As set out in the Planning Statement, DAS and Structural Report, the church building is in serious need of physical repair. The cost of repairing the rear wall and other structural works to ensure the building is made structurally sound is estimated at £2.02 million (Cushman & Wakefield cost plan). The cost each month to lease the parking space to enable the shoring up of rear wall is currently c. £2,500. This expense utilises the Church’s limited funds. Camden Town Methodist Church is within the Islington and Camden Mission Circuit, which comes under the oversight of the Methodist Conference. There is no funding available within the Church, the Circuit or Methodist Conference to fund the necessary repairs of the building.
- 8.19 The Church has looked to external sources (see below) that retain a quantum of community floorspace for the church and its outreach activity. Accordingly we do not consider it is appropriate to assess the proposals against Policy DP15 parts (c) and (d). Notwithstanding this, in response to comments from Camden Council (see Officers Report) we have done so below – to demonstrate the reduction in community space would still accord with the policy criteria.
- 8.20 Below we provide an assessment in relation to parts (c) and (d) of Policy DP15 and the supporting policy text in Paragraphs 15.6-15.8.

**The Council will protect existing community facilities by resisting their loss unless: c) a replacement facility that meets the needs of the local population is provided; or,**

- 8.21 The existing church building provides for the Methodist Church and two other congregations (Korean and Brazilian). This use of the building brings a very small income to the Methodist Church. Until 2008 the lower ground had been let out as affordable student accommodation (C2). As explained in the Planning Statement (Section 2.3) this use and its associated revenue stream ceased as the area was deemed unsafe.
- 8.22 The Church is unable to rent out their building to other community or commercial groups due to its lack of toilet and kitchen facilities and the overarching health and safety issue of the rear wall. It has not therefore been marketed for use by other community groups as it is not considered practical for such purposes. The use of the existing community space (473 sq m) is therefore limited at present.
- 8.23 The area of re-provided worship space will enable space for up to 80 people. The current practising congregation (confirmed members) is 38. The retained dedicated worship space will be of an appropriate space and standard for the Methodist congregation – it is also proposed that the facility will continue to be offered to the other practicing congregations, both of which are similar in size to the Methodist congregation. Upgrade of the facilities will

## 8.0 Planning Assessment

enable the community space to be let to other community groups in addition to the congregation. The multi-purpose room is intended to be made available to other groups within the community.

- 8.24 In addition, Camden Town Methodist Church will use some of the rent from the hotel use to employ a full-time community worker who will work from the church office. The church has committed itself to this proposal.
- 8.25 The replacement facility will therefore meet the needs of the local population in accordance with Policy DP15 (c); improving the current provision of the facility albeit in a more efficient space.

**d) the specific community facility is no longer required in its current use. Where this is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site. Where this is successfully demonstrated, the Council's preferred new use will be affordable housing.**

- 8.26 The specific community facility is still required as explained above, but does not require the same amount space. The proposals will bring significant improvements to the community area and make this more widely available, as a result.
- 8.27 The deteriorating condition is however impacting its ability to serve the church congregation (the reduction in numbers is detailed in the Planning Statement). Its ability to serve the wider local community has already ceased due to the health and safety issues related to the building structure.
- 8.28 The redevelopment proposals will fund the very necessary repair of the building (c. £2.02 million to make the building structurally sound). In doing so they re-provide the community facility in a more efficient format that requires less floorspace.
- 8.29 In addition, the re-provided community use will provide for other suitable community uses on the site. The proposals will not result in a shortfall in provision rather will increase the floorspace available for the local community. Due to the reasons outlined above, we consider that the proposal satisfies policy tests (c) and (d) of Policy DP15.

**Paragraph 15.6-15.8 states that the applicant must 'provide marketing evidence to show that the premises have been offered at a reasonable charge to community groups or voluntary organisations over a 12 month period. Existing community facilities should be offered to potential new users on the same financial basis as that of the previous occupancy. If there were no recent users, the space should be offered at an appropriate rate for community groups/ voluntary sector organisations'.**

- 8.30 As outlined above (and as evidenced on the site-inspection carried out by Council officers on the 13 September 2016), the Church is unable to rent out their building to other community or commercial groups due to its lack of toilet and kitchen facilities and the overarching health and safety issue of the rear wall. It has not therefore been marketed by uses for other community groups as it is not considered practical for such purposes.
- 8.31 The re-provided space, and in particular, the multi-purpose room will be made available for other community groups and a dedicated full-time community worker is being provided as part of the agreement between Camden Town Methodist Church and the Wesley.

## 8.0 Planning Assessment

- 8.32 Para 15.8 sets out that sites in community use generally have a relatively low capital value compared with housing sites. This paragraph relates to positions where community uses have ceased and it has been demonstrated that there is no need for continued community use. In such instances, the Council's preferred use is affordable housing.
- 8.33 As outlined above, community uses have not ceased in their entirety at the site and the proposals re-provide community space for both the church and wider local community. Notwithstanding this, we understand the Council have queried what other options (including residential) have been explored at the site.
- 8.34 Section 2 and Appendix 1 of the Planning Statement set out that the Church have explored alternative options for redeveloping the site, as the Church and Circuit are not in a position to fund the necessary repairs without external funding. As also explained at Para 2.7 of the Planning Statement and within Appendix 1 the Church has already considered a number of alternative ways of developing the premises but all other possibilities are unworkable, either because they would require funding that is not available or the sale of the premises to another organisation.
- 8.35 If this scheme does not go ahead, the premises are likely to continue to deteriorate until they become unsafe even for the church congregation. At this point, it would be necessary to try and sell it on the open market. In addition, as explained in the Planning Statement and Appendix 1, it is expected that membership will continue to decline if the church stays in its current physical condition and will close within a decade.

### Summary

- 8.36 The introduction of the hotel uses on the upper floors therefore brings to the Church:
1. The external funding required to make the building structurally sound; this is potentially the last opportunity to ensure the retention of the building and its community use. The cost of repairs are such that the investment value of the site is negligible and future owners/developers would seek to cease the community uses in favour of commercial only uses in order to generate the funds to meet the repair costs. In the medium term, the building will deteriorate to the point where it is no longer economically viable to repair.
  2. Retained dedicated worship space of an appropriate quantity and standard for the Methodist congregation – it is also proposed that the facility would be offered to the other practicing congregations.
  3. Upgrade of facilities to enable the community space to be let to other community groups in addition to the church.
  4. Enables the building's freehold to be retained by the Church securing its long term future in Camden Town.
  5. An income stream for the Church which will fund a dedicated community worker who will share an office (on the upper floors) with the church minister.
- 8.37 In providing an enhanced and viable long term facility for the CTMC and offering the potential to provide for a range of other community groups, the loss of an element of community (D1) space is considered to be offset by the long term benefits the deliverable proposals will offer. We therefore consider that the loss of an element of community D1 floorspace is justified against Camden policies DP15 and CS10. The Officers Report to the previous submission states that the proposal would protect existing community facility and re-provide enhanced community facilities and as such, the principle of use is considered to

## 8.0 Planning Assessment

be acceptable by Camden Council (see Paragraph 2.8). There has been no change to relevant policy or financial circumstances since the previous submission was considered.

### Loss of student accommodation (C2)

- 8.38 Policy DP9 (Student housing, bedsits and other housing with shared facilities) sets out that the Council will resist the loss of student accommodation unless adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or that the accommodation is no longer required and it can be demonstrated that there is no local demand for student accommodation.
- 8.39 The site provides a small number of student rooms (four units). These are of poor quality and were closed in 2008 due to health and safety concerns. The rooms were not associated with any higher education institution and formed an ancillary use to the D1 church floorspace; having been let through the Church network. Accordingly, the accommodation was not subject to active management.
- 8.40 It is considered that the student accommodation could not be brought back into active use without significant investment to both the accommodation and the church more generally. The Church and the Camden and Islington Methodist Circuit are not in a financial position to fund this (see Section 2 and Appendix 1).
- 8.41 Were it possible to bring the student accommodation back into active use it is not considered there is now the demand for low quality, small scale accommodation. Significant new student accommodation has recently been completed within the London Borough of Camden, or is currently under construction, including in proximity to the site the Unite and Urbanest student accommodation blocks at St Pancras. Camden's 2013/2014 AMR shows that completed developments in Camden have provided an extra 1,116 student rooms since 2009. Moreover, there are a number of units in the pipeline including Midland Crescent (ref: 2013/2564/P), 65 – 69 Holmes Road (ref: 2013/7130/P) and 4 Wild Court (ref: 2013/4789/P). These new residencies provide a significantly higher quality standard of accommodation than that within the Church and have affiliated higher education institutions; thus benefitting from more active student management. It is also questionable whether any of the local educational institutions would endorse the accommodation within the CTMC as being suitable under modern conditions.
- 8.42 Given that the existing student accommodation is unfit for use, has been vacant for over seven years and significant new accommodation meeting students' needs is coming forward elsewhere within the Borough it is considered the relatively minor loss (four units) can be justified against the Policy DP9 tests. The Officers Report states that given the student accommodation has not been in use over the last eight years, the loss of the four student accommodation units is considered to be acceptable. Camden Council already views the principle of the loss of student accommodation on site as acceptable (see Paragraph 2.4 of the Officers Report).

### Proposed Hotel (C1) floorspace

- 8.43 The proposed development will provide a new 39 bedroom hotel in Camden Town Centre (c. 942 sq m C1 floorspace). It is therefore considered to constitute smaller scale visitor accommodation.
- 8.44 The London Plan and Camden's Policy CS8 (Promoting a successful and inclusive Camden economy) recognises the importance of tourism as an employment generating use and

## 8.0 Planning Assessment

directs such development to the borough’s town centres where there is good public transport access to central London.

- 8.45 The site lies within Camden Town Centre and has a PTAL rating of 6b (the highest). It is therefore considered to be within a suitable location for small scale hotel development in accordance with London Plan Policy 4.5 and Camden Policy CS8.
- 8.46 The proposed hotel operator, TheWesley, is a social enterprise and a fundamental component of its business model is generating local employment and local benefits. As explained in Section 2, TheWesley is also part of the Methodist Circuit and has the same shared goal of the Church for worship space to remain at the heart of the proposals.
- 8.47 TheWesley will fund the physical works to make good and extend the building in its conversion to a mixed use building. The Hotel is required to enable both the retention of the church community and of the physical building.
- 8.48 Moreover, the relationship between CTMC and TheWesley ensures that the Church retains freehold ownership of the site and a long term revenue stream. It will ensure that the Church retains a strong presence within the building alongside the new hotel use.
- 8.49 To conclude, we consider that the proposed Hotel (C1) floorspace is justified against London Plan Policy 4.5 and Camden Policy CS8. The Officers Report to the previous submission states that the proposed hotel use is considered appropriate in this area. Camden Council view the principle of hotel use in this location which would support the needs of the existing Methodist Church community by improving the structure of the existing building and re-providing enhanced community use as acceptable.

### POLICY DP1 MIXED USE REQUIREMENT

- 8.50 The proposed development results in the uplift of 576 sq m (GEA floorspace).
- 8.51 By virtue of the site’s location and the proposed uplift in floor space Policy DP1 (Mixed use development) applies to the development proposals. This requires where more than 200 sq m gross additional floorspace is provided, 50% of all additional floorspace to be provided as housing. The Policy notes that the Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed.
- 8.52 However Policy DP1 (a) – (i) sets out a number of considerations as to whether a mix of uses should be sought, whether it can be practically achieved on site, the most appropriate mix of uses and the scale and nature of any contribution to the supply of housing.
- 8.53 It also sets out that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu.
- 8.54 Table 8.1 below summaries the existing floorspace, the floorspace uplift and thus the Policy DP1 requirements.

**Table 8.1**  
Policy DP1 Requirements

Existing floor space	961 sq m GEA
Proposed floor space:	1537 sq m GEA
Uplift floor space:	576 sq m GEA
Target for on-site housing:	576 X 50% = 288 sq m GEA



## 8.0 Planning Assessment

- 8.55 Policy DP1 would under normal circumstances require the provision of 288 sq m residential floorspace.
- 8.56 Part 1 of the Policy DP1 Feasibility and Viability Report which has been prepared as part of the planning application submission documentation demonstrates that it is not appropriate, practical or feasible to achieve residential floorspace on the constrained site as part of the mixed use proposals for the building. In particular, the Report and its accompanying drawings, highlights having regard to DP1 considerations (a) – (i) and Development Management Policies Para 1.19 – 1.24, that:
- The introduction of residential accommodation would result in a reduction in the space available to church and hotel uses. The extent of the extension, and therefore available floorspace, has reduced significantly during the pre-application process in response to comments from Camden Design and Conservation Officers (see Design and Access and Planning Statements). This has resulted in a drop in space available to both the church and hotel, although it has predominately been the hotel floorspace which has been lost during these design revisions. A further drop in hotel floorspace and therefore bedrooms is considered to make the hotel unviable (the confidential Policy DP1 Financial and Viability Report contains details on viability).
  - Providing on-site residential would generate the requirement for a separate access, core and other circulation spaces. This would require significant amendments to the scheme design, in particular the lower ground floor, and is not considered practicable within the (reduced) proposed building envelope.
  - Providing on-site residential would also generate requirements for further ‘back of house’ facilities such as waste, recycling and cycling parking. Again this would increase ancillary floorspace and reduce the quantum available for church and hotel uses. It is not considerable practicable within the (reduced) proposed building envelope.
  - Providing on-site residential would likely generate the need for additional plant which could not be incorporated within the building envelope.
  - The applicant, CTMC, wish to retain ownership of the building. The Wesley will operate the propose hotel with the building being managed by the Methodist Council on behalf of the Methodist Conference. As described in Section 3, the CTMC previously pursued a residential scheme at the site (ref: 2010/4319/P) however this was rejected by the Church due to lease and management arrangement issues. The current partnership arrangement is accepted by the Church. Introducing residential would compromise this.
- 8.57 Accordingly, on-site residential provision is not considered appropriate, practicable or feasible at the site.
- 8.58 Part 2 of the Policy DP1 Feasibility and Viability Report sets out the implications of the scheme viability of providing a payment in lieu. Whilst Policy DP1 provides exceptional circumstances for publically funded developments it does not list out charities or social enterprises as an exception. It is worth noting however that whilst the CTMC is not a registered charity due to its income falling below £100,000 it is ‘an exempted charity under Statutory Instrument 2014 No. 242’. The proposed operator, The Wesley is a small social enterprise whose profits are spent by its parent charity, The Methodist Council to support student’s education in UK and all over the world.
- 8.59 The DP1 payment in lieu would significantly prolong The Wesley’s payback period for development and prevent the reinvestment of profits within the church and Methodist Council. It is considered that other developers would not undertake this development

## 8.0 Planning Assessment

proposal at the low viability levels, and as such an off-site contribution in this circumstance is not appropriate.

- 8.60 To conclude, we do not consider residential uses appropriate for this site and its situation. The Policy DP1 Feasibility and Viability Report, submitted along with other documentation, further explains the reasoning behind this. As such the caveats associated with the application of Policy DP1 would endure and the Council has already considered that a mix of hotel and community space is considered acceptable and that the proposals can be justified against Camden Policy DP1.

### DESIGN AND CONSERVATION

- 8.61 As set out in Section 6.0, the applicant has undertaken pre-application discussions with LBC Planning, Design and Conservation Officers and offered opportunities for discussion with CAAC, Ward Councillors and surrounding occupiers. In particular, following the pre-application advice received on 13 September 2016, the scheme has undergone significant redesign as explained in the Design and Access Statement.

#### Urban Design

- 8.62 In accordance with the NPPF and Policy DP24, the application is accompanied by a Design and Access Statement which considers how the proposed development successfully addresses:
- Character, setting, context and the form and scale of neighbouring buildings;
  - The character and proportions of the existing building, where alterations and extensions are proposed;
  - The quality of materials to be used;
  - The provision of visually interesting frontages at street level
  - The appropriate location for building services equipment;
  - The provision of appropriate hard and soft landscaping including boundary treatments;
  - Accessibility.
- 8.63 The design seeks to retain the majority of the existing building through inserting a reinforced concrete frame to brace the existing external walls, and ‘hang’ the new hotel floors. The external alterations to the building are therefore limited to the new roof extension, amendments to the main entrance on Plender Street, minor alterations to the King’s Terrace elevation and amendments to the rear elevation. These are considered to sensitively respond to the existing building and be of the highest standard of design in accordance with Camden’s Design policies CS14 (Promoting high quality places and conserving our heritage), DP24 (Securing high quality design) and DP25 (Conserving Camden’s heritage).

#### Proposed Extension

- 8.64 The extension comprises a sensitive one storey (equivalent) extension. It has been significantly reduced during the design process and sought to be minimised whilst still achieving the required quantum of church and community floorspace and providing the minimum viable number of hotel rooms.

## 8.0 Planning Assessment

- 8.65 The massing has been reduced and the roof line setback from the building edges on Plender Street and the side elevations so as to provide a sensitive scale which reflects the massing and bulk of other buildings in the surrounding area. The roof is also sloped to minimise its impact in townscape views. The scale, bulk and design are now seen as a sympathetic addition to the existing building, enhancing the streetscape, and the character and appearance of the Camden Town Conservation Area.
- 8.66 In accordance with Section 7 of the NPPF the scheme is considered to optimise the potential of the site, whilst responding to local character. The extension is considered to be a proportionate response to the surrounding context in accordance with London Plan 7.6.

### Building Entrances

- 8.67 The entrance on Plender Street is proposed to be revised in order to create level access for the church congregation and hotel visitors in accordance with Policy DP29 (Improving access) which promotes fair access and calls for the removal of barriers that prevent people from accessing facilities and opportunities. All buildings will be expected to meet the highest practicable standards of access and inclusion and must be designed to be as accessible as possible. The existing stepped entrance will therefore be lowered to provide a level access to the building from street level. This ensures that the building is universally accessible.
- 8.68 The proposed design of the revised entrance seeks to respect the character and proportions of the existing building. The full height entrance will help improve the presence of the entrance on the streetscene creating a visually interesting frontage.
- 8.69 A series of smaller interventions are proposed along King's Terrace to create a separate access to the church and enable access to the refuse and storage area. These amendments are minor in nature and again sensitive to the existing building.
- 8.70 Overall, the design of the entrances is justified through Camden Policy DP29.

### Rear Wall

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

### Accessibility

- 8.72 In accordance with Camden Policy DP29 (Improving access), the proposed development achieves the highest levels of inclusive design for an existing local heritage assets. In particular, the amended entrance will create level access.
- 8.73 Lifts running through the building provide access to the lower ground church and community space and hotel rooms on the upper floors.
- 8.74 10% of the hotel bedrooms will be universally accessible in accordance with London Plan Policy 4.5.

### Heritage

- 8.75 The site is located within the Camden Town Conservation Area. Although it is not statutory or locally listed, however it is noted within the Camden Town Conservation Area Appraisal as making a positive contribution to the character of the Conservation Area.
- 8.76 The NPPF recognises that not all elements of Conservation Area will necessarily contribute to its significance (Paragraph 138).

## 8.0 Planning Assessment

- 8.77 In accordance with Paragraph 128 of the NPPF, a full assessment of the site’s contribution to the Conservation Area has been undertaken by heritage specialists, Heritage Collective. This Heritage Statement is submitted as part of the planning application documents and has been updated since the initial application.
- 8.78 The Heritage Statement treats the building as a non-designated heritage asset, the focus of the assessment is the conservation area. It describes the contribution of the building to the conservation area as:
- “essentially its pleasant architectural treatment, primarily the imposing Plender Street façade and the King’s Terrace side elevation. It forms part of the Victorian development of the area and it represents the period as a ‘one of a kind’ structures rather than as part of an ensemble or group. The building is not remarkable for any reason and it is unsurprising that it is not locally listed, but it does add character and a sense of time depth, and it illustrates the development of the area. In this sense it is a positive contributor to the character and appearance of the area”.*
- 8.79 The rear elevation which is proposed to be “demolished” and rebuilt due to its poor structural condition is assessed as “unremarkable and plain” within the Heritage Statement.
- 8.80 Having assessed the significance of the non-designated heritage asset to the Conservation Area the Heritage Statement assesses the impact of the external amendments on the non-designated heritage asset. The key external change is considered to be mansard extension which is considered to have been designed to relate well to the host building and not have an undue presence or compromise the proportions of the building in accordance with London Plan Policy 7.8 and Camden Policies DP24 (Securing high quality design).
- 8.81 Since the initial application was submitted, the roof elevation has been significantly reduced in scale and bulk, as a sympathetic addition to the existing building, enhancing the streetscape and the character and appearance of the Camden Town Conservation Area. The Camden Town Conservation Area Action Committee previously expressed concern that the raising of the roof would be ‘ugly and top heavy’. The one storey extension has been redesigned with sensitive materials to reflect the character of the conservation area and to ensure that the building continues to make a positive contribution. See Section 5.0 for more detailed information on the proposed redevelopment.
- 8.82 25 Other external changes are assessed as relatively minor and facilitate the proposed conversion of the heritage assets to secure its long term viable use in accordance with Para 131 of the NPPF. The Heritage Statement concludes that:
- “Overall, the benefits of the proposed development, including the conversion to secure a sustainable and viable long term use, would by far outweigh any residual harm. The National Planning Practice Guidance recognises that reducing or removing risks to a heritage asset is a heritage-specific benefit, as is securing the optimum viable use of a heritage asset in support of its long term conservation. In this respect there is a compelling case, in heritage terms, for granting permission on heritage grounds.”*
- 8.83 The benefits clearly outweigh any residual harm to the heritage asset in accordance with the NPPF heritage tests and the proposals are considered to accord with the London Plan Policy 7.8 and Camden’s Policies DP24.

### NEIGHBOURING AMENITY

- 8.84 The proposed development has been considered with respect to any impacts on surrounding occupiers, in particular the residential amenities of neighbouring properties, to

## 8.0 Planning Assessment

ensure adequate protection to their visual privacy, outlook, daylight and sunlight in accordance with Camden Policy DP26 (Managing the impact of development on occupiers and neighbours).

### Daylight and Sunlight

- 8.85 An External Daylight and Sunlight Report has been prepared to assess the implications of sunlight and daylight on surrounding properties and forms part of this submission. In accordance with Camden Policy DP26 and BRE's Site Layout Planning for Daylight and Sunlight (2011) this assesses all residential properties that will be affected by the development in sunlight and daylight terms.
- 8.86 It concludes that the VSC, ADF and No-sky/daylight distribution analysis indicates that all but two windows pass at least one of the BRE studies. The neighbouring windows will automatically remain adequately lit in the majority as a result of the development proposals and will comply with the BRE criteria in the urban context. Since the initial application, the roof profile has been further reduced and so the conclusions of the report will remain. The Officers Report in relation to the previous application does not raise any concerns.
- 8.87 The sunlight and winter sunlight assessment results show that they achieve similar results and are considered acceptable when perceived in the urban context. Therefore, in accordance with Camden Policy DP26 and BRE's Site Layout Planning for Daylight and Sunlight (2011), the proposed development is considered acceptable.

### Privacy and Outlook

- 8.88 The closest properties containing elements of residential are considered to be 87 – 88 Plender Street, the properties along King's Terrace and the properties along Bayham Street which back onto the rear of the site.
- 8.89 The scheme retains the existing window openings, adding new windows only at the mansard extension level. The existing windows do not align with the hotel bedrooms, as the scheme is based upon a concrete frame erected internally within the existing buildings. This reduces any opportunities of direct overlooking from the new hotel bedrooms into the residential units.

### Hotel Management

- 8.90 A Hotel Management Plan has been prepared to accompany the planning application submission. This provides an overview of how the hotel will be managed, including details of managing visitors, staff and deliveries. It is proposed that further detail could be provided, as required, ahead of occupation.
- 8.91 As detailed in the officers report, a legal agreement to for securing a Hotel Management Plan should be put in place. This will provide an assessment of how the hotel will effect local amenities and neighbouring residential properties, and strategies in order to minimise any adverse impacts. As such, the proposed hotel development acts in accordance with Camden Policies SC5 (Managing the impact of growth), CS19 (Delivering and monitoring the Core Strategy), DP14 (Tourism development and visitor accommodation) and DP26 (Managing the impact of development on occupiers and neighbours).

### Noise

- 8.92 In accordance with Policy DP28 (Noise and vibration) and Camden's CPG6 Amenity, the issue of noise has been carefully considered in the design of the proposed scheme.

## 8.0 Planning Assessment

- 8.93 It is proposed to locate plant within the mansard roof, rather than located externally, both for visual and amenity purposes. A Noise Assessment has been undertaken to assess the baseline noise levels at the site and it proposes plant noise limits for any future plant equipment to ensure compliance with relevant noise planning policies and regulations. The Officers Report states that the proposed plant would not result in unacceptable noise levels and is therefore considered acceptable.

### Dropping of Lower Ground Floor

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

### Summary

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

## TRANSPORT, SERVICING AND ACCESS

### Location and Transport Impact of Proposal

- 8.99 The site has a public transport accessibility level of 6a (highly accessible).
- 8.100 The proposed development will therefore be supported by excellent public transport links in accordance with London Plan Policy 6.1 and Camden Policies DP16 (Improving Camden's health and wellbeing) and DP17 (walking, cycling and public transport)
- 8.101 A S106 agreement would need to be agreed in order to secure necessary contributions towards highway works to make provision to restore the pedestrian environment to an acceptable condition, in accordance with Policies CS11 (Sustainable travel), CS19 (Delivering and monitoring the Core Strategy), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network).

### Car and cycle parking

- 8.102 It is proposed that the development would be car free in accordance with Camden Policy DP18 (Parking standards and limiting the availability of car parking) which seeks car free development in town centres.

## 8.0 Planning Assessment

- 8.103 In accordance with the Further Alterations to the London Plan Cycle standards, the proposals will provide a total of 6 cycle parking spaces for the church and hotel uses.
- 8.104 This is comprised of 3 long-term cycle spaces located within the lower ground floor. 2 are provided for the hotel uses and 1 for church staff. A further 3 short-stay spaces are provided externally comprising 1 for the hotel uses and 2 for church visitors. Construction Management
- 8.105 The car and car parking requirements can be justified in accordance with Camden Policy DP18 and the Further Alterations to the London Plan Cycle standards.
- 8.106 A Draft Construction Traffic Management Plan has been submitted with this application. This sets out how construction traffic will access the site, to ensure no traffic disruption or danger to pedestrians and other road users during construction. It also ensures construction on-site is not detrimental to the amenities of the area generally. A full Construction Management Plan would be prepared subject to any conditions imposed as a result of planning permission and once a contractor has been appointed.
- 8.107 As such, the development acts in accordance with Camden Policies CS5 (Managing the impact of growth and development), CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy), DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours). The car and car parking requirements can be justified in accordance with Camden Policy DP18 and the Further Alterations to the London Plan Cycle standards.

### Drop-Offs

- 8.108 Any taxi drop offs/collection will occur in the lay-by outside the Church on the Plender Street elevation.
- 8.109 As set out in the Hotel Operators Management Statement, the hotel will not accept coach parties due to the small and boutique nature of the hotel.
- 8.110 A legal agreement to for securing a Travel Plan should be agreed, with the main aim of promoting sustainable forms of transport. This will act in accordance with Camden Policies CS11 (Sustainable travel), SC19 (Delivering and monitoring the Core Strategy) and DP16 (Transport implications of development).

### Waste, Refuse and Servicing

- 8.111 A refuse store is located internally at lower ground level providing 2 x 1100 L Eurobins ( for general waste and recycled material) and 1 x 500 L Eurobin (for food waste) in accordance with Camden's Waste Standards set out in CPG1.
- 8.112 One existing window on the King's Terrace elevation will be converted to a door to allow for refuse and recycling to be put out for collection and any deliveries to brought into the building. It is proposed that any waste and recycling will be put outside the building 30 minutes before Camden's waste collection times (06.00, 18.00 or 00.00) should a collection be required that day.
- 8.113 It is proposed that all deliveries will take place on-street (King's Terrace and/or Plender Street), due to the majority of the site being occupied by the existing building.
- 8.114 Deliveries will comply with strict procedure as set out in the draft Operational Management Statement. It is expected that the site will receive a maximum of five deliveries per day on



## 8.0 Planning Assessment

weekdays and between two and three on Saturdays. Weekday deliveries will normally be between 08.00 and 16.00 on weekdays and between 08.00 to 12.00 on Saturdays to ensure minimum disturbance to surrounding occupiers. A full Operational Management Plan would be prepared subject to any planning permission confirming arrangements. The Officers Report states that the approach to waste collection is considered by Camden Council to be acceptable. A draft Construction Traffic Management Plan has been submitted with this application in accordance with Camden Policies CS5, CS11, CS19, DP20, DP21 and DP26. This sets out how construction, including construction traffic, will be managed. A full Construction Management Plan would be prepared subject to any planning permission and once a contractor has been appointed.

### ENERGY AND SUSTAINABILITY

- 8.115 In accordance with Policy DP22 (Promoting sustainable design and construction), the development will incorporate sustainable design and construction measures. The Wesley is already recognised by Camden Council as a Carbon Champion. This is largely due to us achieving set targets in reducing water and energy usage at our site in Euston. In particular, these measures will reduce carbon emissions and minimise the use of energy, water and resources, and thus meet the needs of climate change detailed with Camden Policy CS13 (Tackling climate change through promoting higher environmental standards). This policy also sets out that development within Camden will be required to demonstrate compliance with BREAAAM Very Good.
- 8.116 The BREEAM Pre-Assessment Report, submitted as part of the application documents sets out that the proposals can reasonably achieve a BREEAM Rating of Good; however, the issues that are required to achieve BREEAM Very Good are dependent on contractor deliverables, appointment of additional consultants and the post occupancy elements of the design. These would only be addressed at RIBA Stage 4 at the earliest. In accounting for these, it is expected that BREEAM Very Good could be achieved.
- 8.117 We therefore consider a legal agreement requiring the incorporation of sustainable design and construction measures to be acceptable to reduce carbon emissions and minimise use of energy, water and resources in accordance with Camden Policies SC13 (Tackling climate change through promoting higher environment standards), CS19 (Delivering and monitoring the Core Strategy) and DP22 (Promoting sustainable design and construction).
- 8.118 A legal agreement securing an Energy Efficiency plan will be put in place, detailing on-site renewable energy facilities. As such, the proposed development is considered acceptable in line with Camden Policies CS13 (Tackling climate change through promoting higher environmental standards), CS16 (Improving Camden's health and well-being), SC19 (Delivering and monitoring the Core Strategy), DP22 (Promoting sustainable design and construction), DP23 (Water) and DP32 (Air quality and Camden's Clear Zone).
- 8.119 A S106 agreement would need to be agreed in order to secure contributions towards new or improved public open space, in accordance with Policy DP31 (Open space and outdoor recreation) and CS19 (Delivering and monitoring the Core Strategy).

## 9.0 Conclusion

- 9.1 The proposals seek to sensitively introduce a new 39-bed hotel into the existing Camden Town Methodist Church alongside retained dedicated worship space and flexible community space.
- 9.2 The current Church building is in desperate need of structural repair and refurbishment. Its rear wall has been supported by an external steel frame, on leased land for over ten years, and many parts of the building have been rendered unusable due to health and safety issues.
- 9.3 The costs of maintaining the Church have become too high for CTMC to sustainability continue to manage. The rental for the steel frame and the lease payments on the ground on which it stands have been a continuing drain on the financial resources of the church with no benefit to the church, save that the church is still standing. A long term solution is needed to save the church building and its congregation.
- 9.4 Without significant repair the Church’s membership is anticipated to continue to decline and it is considered it would likely close within a decade. Moreover, without the proposed investment the building itself will need to be considered at risk and highly likely that it will continue to deteriorate until it is assessed as being ‘unsafe’. The CTMC has considered and pursued various options for redeveloping the site to avoid it becoming an unusable, vacant building. The Church and the Camden and Islington Methodist Circuit as not in a financial situation to redevelop the site without significant external funding.
- 9.5 In order to achieve their aims of receiving external funding, maintaining worship space and retaining ownership of the site, CTMC have partnered with the Methodist International Centre (MIC) who trade as TheWesley Hotel social enterprise hotel.
- 9.6 The relationship between the CTMC and TheWesley represents an opportunity to save the heritage asset and provide a future for the church congregation, community and building. The introduction of a social enterprise Hotel on the upper floors will cross-subsidise the essential structural works to make good the heritage asset and provide a retained, safe place of worship for the Church congregation as well as flexible community space.
- 9.7 The proposed development will provide a long term worship space as well as a reliable income stream for the CTMC. (TheWesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference). The proposals will also remove the need for all of the CTMC assets to be directed towards maintaining the building and will allow the congregation to be more active in the community.
- 9.8 The proposals have evolved since the initial application was refused on 2 June 2016. Through further pre-application discussions with Camden Council, the proposed design has been reconsidered and is now compliant with Camden’s design policies. It protects and enhances Camden Town Conservation Area with a design which reflects the character of the area and is sensitive and appropriate to its surroundings. Below is a summary as to how the original reasons for refusal have been addressed in the current application.
  - Reason for Refusal 1: *The proposed development by reason of its scale, bulk and detailed design would be an incongruous addition to the host building, harming the streetscape and detracting from the character and appearance of the Camden Town Conservation Area.*

The design, in particular the roof elevation, has been revised for the current application. The new proposals in terms of scale, bulk and design are sympathetic to the heritage building and surrounding conservation area and can be justified against policy CS14

## 9.0 Conclusion

(Promoting high quality places and conserving our heritage), policy DP24 (Securing high quality design) and DP25 (Conserving Camden’s heritage).

- Reason for refusal 2: *The proposed development, in the absence of a legal agreement for securing contributions towards offsite housing, the development would be likely to contribute to pressure and demand on existing housing in this area.*

Part 2 of the Policy DP1 Feasibility and Viability Report sets out the implications of the scheme viability of providing a payment in lieu. The DP1 payment in lieu would significantly prolong TheWesley’s payback period for development and prevent the reinvestment of profits within the church and Methodist Council. It is considered that other developers would not undertake this development proposal at the low viability levels, and as such an off-site contribution in this circumstance is not appropriate.

- Reason for refusal 3: *The proposed development, in the absence of a legal agreement for securing necessary contributions towards highway works would fail to make provision to restore the pedestrian environment to an acceptable condition.*

A S106 agreement will be agreed, in accordance with policy CS11 (Sustainable travel), SC19 (Delivering and monitoring the Core Strategy), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network).

- Reason for refusal 4: *The proposed development, in the absence of a legal agreement for securing contributions towards new or improved public open space, the development would be likely to contribute to pressure and demand on the existing open space in this area.*

A S106 agreement will be agreed to address this point in accordance with policy DP31 (Open space and outdoor recreation) and SC19 (Delivering and monitoring the Core Strategy).

- Reason for refusal 5: *The proposed development, in the absence of a legal agreement for securing a travel plan, would fail to adequately promote the use of sustainable forms of transport.*

A S106 agreement will be agreed to secure the production of a travel plan, in accordance with policies CS11 (Sustainable travel), SC19 (Delivering and monitoring the Core Strategy) and DP16 (Transport implications of development).

- Reason for refusal 6: *The proposed development, in the absence of a legal agreement for securing a Hotel Management Plan, would be likely to generate adverse impacts upon the amenities of the area and neighbouring residential properties.*

A S106 agreement will be agreed to secure a Hotel Management Plan, in accordance with Camden Policies SC5 (Managing the impact of growth), CS19 (Delivering and monitoring the Core Strategy), DP14 (Tourism development and visitor accommodation) and DP26 (Managing the impact of development on occupiers and neighbours).

- Reason for refusal 7: *The proposed development, in the absence of a legal agreement for securing the submission and implementation of a Construction Management Plan, would be likely to contribute unacceptably to traffic disruption and dangerous situations for pedestrians and other road users and be detrimental to the amenities of the area generally.*

A Draft Construction Traffic Management Plan has been submitted with this application. A full Construction Management Plan would be prepared subject to any conditions imposed as a result of planning permission and once a contractor has been appointed.

## 9.0 Conclusion

As such, the development acts in accordance with Camden Policies CS5 (Managing the impact of growth and development), CS11 (Promoting sustainable and efficient travel), CS19 (Delivering and monitoring the Core Strategy), DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours).

- Reason for refusal 8: *The proposed development, in the absence of a legal agreement for requiring the development to incorporate sustainability measures to reduce carbon emissions and minimise use of energy, water and resources, would fail to be sustainable in its use of its resources and meet the challenge of climate change.*

A S106 agreement will be agreed in order to address this issue in accordance with Camden Policies SC13 (Tackling climate change through promoting higher environment standards), CS19 (Delivering and monitoring the Core Strategy) and DP22 (Promoting sustainable design and construction).

- Reason for refusal 9: *The proposed development, in the absence of a legal agreement for securing an energy efficiency plan including on-site renewable energy facilities, would fail to be sustainable in its use of resources and fail to take sufficient measures to minimise the effects of, and adapt to, climate change.*

A S106 agreement will be agreed in order to address this issue in accordance with Camden Policies CS13 (Tackling climate change through promoting higher environmental standards), CS16 (Improving Camden’s health and well-being), SC19 (Delivering and monitoring the Core Strategy), DP22 (Promoting sustainable design and construction), DP23 (Water) and DP32 (Air quality and Camden’s Clear Zone).

- 9.9 In conclusion, the proposed development is critical to enabling a future for the CTMC. It substantially accords with the aims and objectives of the National Planning Policy Framework and the Development Plan policies. In line with the Presumption in Favour of Sustainable Development the planning and conservation area consent applications should be approved without delay.

---

# APPENDICES

---

# APPENDIX 1

Camden Town Methodist Church

---

89 Plender Street  
London  
NW1 0JN

# **The Church Perspective**

*Addition to Submission for Planning*



## 1. Brief Description of the current situation:

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

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

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

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

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

## 2. Charitable standing

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

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

register with the Charity Commission. Methodist charities asked for their charity number should quote their registered number (if registered) or, if still excepted charities, their HMRC (Her Majesty's Revenue and Custom) Gift Aid number. If the Methodist charity does not have a gift aid number then the charity should state it is an excepted charity under Statutory Instrument 2014 No 242<sup>1</sup>.

### 3. The future of Camden Town Methodist Church:

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

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

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

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

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

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

---

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

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

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

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

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

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

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

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

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

April 2015

# APPENDIX 2

## **THEWESLEY**

### Background

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

### Relationship with the Camden Town Methodist Church

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

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

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

### Precedents

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

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

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

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

### What ethical hospitality means to us

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

### **Awards and Accolades:**

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

### **Conclusion**

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

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



# APPENDIX 3

CBRE Ltd  
Henrietta House  
Henrietta Place  
London  
W1G 0NB

Application Ref: **2015/7007/P**  
Please ask for: **Zenab Haji-Ismail**  
Telephone: 020 7974 **3270**

2 June 2016

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Full Planning Permission Refused**

Address:  
**89 Plender Street**  
**London**  
**NW1 0JN**

#### Proposal:

Internal alterations to facilitate the change of use of the lower ground floor from student accommodation (Class C2) to a place of worship and flexible worship space (Class D1), the change of use of the upper floors from worship space (Class D1) to hotel (Class C1) and the erection of a single storey roof extension to provide a 43 bedroom hotel with associated alterations to the fenestration and the main and side entrances.

Drawing Nos: 859\_03/01/0100 P1, 859\_03/01/0101 P1, 859\_03/01/0219 P1, 859\_03/01/0220 P1, 859\_03/01/0221 P1, 859\_03/01/0500 P1, 859\_03/01/0501 P1, 859\_03/01/0600 P1, 859\_03/01/0601 P1, 859\_03/01/0602 P1, 859\_03/01/0603 P1, 859\_03/03/0219 P1, 859\_03/03/0220 P1, 859\_03/03/0221 P1, 859\_03/03/0222 P1, 859\_03/03/0223 P1, 859\_03/03/0224 P1, 859\_03/03/0225 P1, 859\_03/03/0226 P1, 859\_03/03/0510 P1, 859\_03/03/0511 P1, 859\_03/03/0512 P1, 859\_03/03/0513 P1, 859\_03/03/0600 P1, 859\_03/03/0601 P1, 859\_03/03/0602 P1, 859\_03/03/0603 P1, 859\_03/03/0800 P1, 859\_03/03/0801 P1, 859\_03/03/0802 P1 and 859\_03/03/0803 P1.

Design and Access Statement Manolo & White (including Structural Report); Planning Statement CBRE, Draft Construction Management Plan draft Construction Management Transport Plan, Morgan Tucker; Draft Hotel Operators Management Statement



The Wesley, Heritage Statement Heritage Collective, Daylight/Sunlight Assessment Behan Ltd, Sustainability/Energy Statement CBRE, Noise Impact Assessment CSG Acoustics, Phase 1 Preliminary Risk Assessment; and Policy DP1 Feasibility and Viability Report (redacted) The Wesley.

The Council has considered your application and decided to **refuse** planning permission for the following reason(s):

#### Reason(s) for Refusal

- 1 The proposed development by reason of its scale, bulk and detailed design would be an incongruous addition to the host building, harming the streetscape and detracting from the character and appearance of the Camden Town Conservation Area contrary to policy CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) of the London Borough of Camden Local Development Framework Development Policies.
- 2 The proposed development, in the absence of a legal agreement for securing contributions towards offsite housing, the development would be likely to contribute to pressure and demand on existing housing in this area, contrary to policy CS1 (Distribution of growth) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP1 (Mixed use development) of the London Borough of Camden Local Development Framework Development Policies.
- 3 The proposed development, in the absence of a legal agreement securing necessary contributions towards highway works would fail to make provision to restore the pedestrian environment to an acceptable condition contrary to policies CS11 (sustainable travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and DP17 (walking, cycling and public transport) and DP21 (Development connecting to the highway network) of the London Borough of Camden Local Development Framework Development Policies.
- 4 The proposed development, in the absence of a legal agreement for securing contributions towards new or improved public open space, the development would be likely to contribute to pressure and demand on the existing open space in this area, contrary to policy CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP31 (open space and outdoor recreation) of the London Borough of Camden Local Development Framework Development Policies.
- 5 The proposed development, in the absence of a legal agreement securing a travel plan, would fail to adequately promote the use of sustainable forms of transport contrary to policies CS11 (sustainable travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and DP16 (transport implications of development) of the

London Borough of Camden Local Development Framework Development Policies.

- 6 The proposed development, in the absence of a legal agreement for securing a Hotel Management Plan, would be likely to generate adverse impacts upon the amenities of the area and neighbouring residential properties contrary to policies CS5 (managing impact of growth) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP14 (Tourism development and visitor accommodation) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- 7 The proposed development, in the absence of a legal agreement to secure the submission and implementation of a Construction Management Plan, would be likely to contribute unacceptably to traffic disruption and dangerous situations for pedestrians and other road users and be detrimental to the amenities of the area generally, contrary to policies CS5 (Managing the impact of growth and development), CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- 8 The proposed development, in the absence of a legal agreement requiring the development to incorporate sustainability measures to reduce carbon emissions and minimise use of energy, water and resources, would fail to be sustainable in its use of its resources and meet the challenge of climate change, contrary to policy CS13 (Tackling climate change through promoting higher environmental standards) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 (Promoting sustainable design and construction) of the London Borough of Camden Local Development Framework Development Policies.
- 9 The proposed development, in the absence of a legal agreement securing an energy efficiency plan including on-site renewable energy facilities, would fail to be sustainable in its use of resources and fail to take sufficient measures to minimise the effects of, and adapt to, climate change, contrary to policies CS13 (Tackling climate change through promoting higher environmental standards), CS16 (Improving Camden's health and well-being) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Promoting sustainable design and construction), DP23 (Water) and DP32 (Air quality and Camden's Clear Zone) of the London Borough of Camden Local Development Framework Development Policies.

Informative(s):

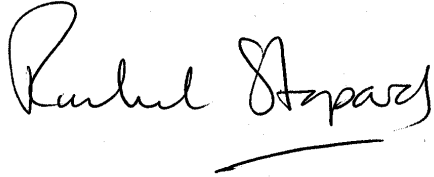
- 1 Without prejudice to any future application or appeal, the applicant is advised that reasons for refusal numbers 2-9 could be overcome by entering into a Section 106 Legal Agreement for a scheme that was in all other respects acceptable.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rachel Stopard', with a horizontal line underneath.

Rachel Stopard  
Director of Supporting Communities

# APPENDIX 4

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	<b>15/03/2016</b>
		N/A / attached	<b>Consultation Expiry Date:</b>	
<b>Officer</b>		<b>Application Number(s)</b>		
Zenab Haji-Ismael		2015/7007/P		
<b>Application Address</b>		<b>Drawing Numbers</b>		
89 Plender Street London NW1 0JN		<p>859_03/01/0100 P1, 859_03/01/0101 P1, 859_03/01/0219 P1, 859_03/01/0220 P1, 859_03/01/0221 P1, 859_03/01/0500 P1, 859_03/01/0501 P1, 859_03/01/0600 P1, 859_03/01/0601 P1, 859_03/01/0602 P1, 859_03/01/0603 P1, 859_03/03/0219 P1, 859_03/03/0220 P1, 859_03/03/0221 P1, 859_03/03/0222 P1, 859_03/03/0223 P1, 859_03/03/0224 P1, 859_03/03/0225 P1, 859_03/03/0226 P1, 859_03/03/0510 P1, 859_03/03/0511 P1, 859_03/03/0512 P1, 859_03/03/0513 P1, 859_03/03/0600 P1, 859_03/03/0601 P1, 859_03/03/0602 P1, 859_03/03/0603 P1, 859_03/03/0800 P1, 859_03/03/0801 P1, 859_03/03/0802 P1 and 859_03/03/0803 P1.</p> <p>Design and Access Statement Manolo &amp; White (including Structural Report); Planning Statement CBRE, Draft Construction Management Plan draft Construction Management Transport Plan, Morgan Tucker; Draft Hotel Operators Management Statement TheWesley, Heritage Statement Heritage Collective, Daylight/Sunlight Assessment Behan Ltd, Sustainability/Energy Statement CBRE, Noise Impact Assessment CSG Acoustics, Phase 1 Preliminary Risk Assessment; and Policy DP1 Feasibility and Viability Report (redacted) The Wesley.</p>		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Internal alterations to facilitate the change of use of the lower ground floor from student accommodation (Class C2) to a place of worship and flexible worship space (Class D1), the change of use of the upper floors from worship space (Class D1) to hotel (Class C1) and the erection of a single storey roof extension to provide a 43 bedroom hotel with associated alterations to the fenestration and the main and side entrances.				
<b>Recommendation(s):</b>		<b>Refuse Planning Permission</b>		
<b>Application Type:</b>		<b>Full Planning Permission</b>		

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>42</b>	No. of responses	<b>09</b>	No. of objections	<b>00</b>
<b>Summary of consultation responses:</b>	<p>Letters in support of the application were received from neighbouring residents at 18 Borrowdale – Robert Street and 52 Kenbrook House- Leighton Road</p> <ul style="list-style-type: none"> <li>• The church is in desperate need of refurbishment</li> <li>• Camden Town Methodist Church is just a stone's throw away from Camden High Street. The proposal would greatly benefit, and play its part in the lives of the local community, if it was given the go ahead of desperately needed refurbishment.</li> <li>• The church could do a lot of good work and provide a welcoming environment, which could then be accessible by mums and tots with prams, the disabled with wheelchairs and the elderly, who find it difficult at their time of life climbing steps, if a ramp was in place.</li> </ul>					
<b>CAAC comments:</b>	<p>The Camden Town CAAC has objected to the application on the following grounds</p> <ul style="list-style-type: none"> <li>• The worship space occupying the ground and first floor levels is a fine interior with its organ and encircling gallery. Its North entrance - a five bay, elevation of two storeys and double pediment is an elegant design and certainly enhances Plender Street</li> <li>• Object strongly to the proposed insertion of the four floors for a proposed 'hotel'. as well as the raising of the roof which will be ugly and top heavy.</li> <li>• The proposed entrance door is also entirely out of keeping with the classical elevation.</li> <li>• The Chapel is at present completely intact but will be wrecked by the present proposal.</li> <li>• It is appreciated that the Chapel is in poor condition but the CAAC are concerned that the Methodist Church has not considered alternative grants</li> <li>• There is an unsatisfied need for public performance space in Camden Town. The present worship space and gallery in the Chapel seats 600 people and would make an ideal venue for concerts, performances and talks of every kind.</li> <li>• There are examples of elsewhere in London where buildings have been brought back into a viable use for example the Union Chapel in Islington which was saved some years ago and now manages to hold traditional services as well as concerts of every kind. It is enormously popular.</li> <li>• The Camden Town Methodist Church is not listed due to the fact that Historic England only listed Koko on Camden High Street as well as the residential terraces in 1974. They have not reviewed the area since.</li> <li>• The existing Chapel is locked at present which has prevented several people being able to visit its interior to comment on this proposal.</li> </ul>					



## Site Description

The subject site comprises a two storey plus mezzanine gallery Methodist church building situated on the southern side of Plender Street and on the eastern corner with King's Terrace. The building is 3-storeys tall, with principle elevations to Plender Street and Kings Terrace. The building was constructed in 1889/90 and remains in church use, with additional ancillary community uses. The site is located within the Camden Town Centre and within the Camden Town Conservation Area. The building is identified in the Camden Town Conservation Area Appraisal and Management Strategy (CAAMS) as making a positive contribution to the area. The existing church is in a dilapidated state, the existing rear elevation is structurally unsound.

## Relevant History

**2012:** Planning application withdrawn for internal and external alterations to existing place of worship (Class D1), including conversion of basement student accommodation (Class C2) to ancillary meeting halls (Class D1) and creation of 6 x 1-bedroom residential units (Class C3) on new first floor mezzanine level, and associated alterations to doorways and fenestration.

**2002:** Permission refused for "Erection of replacement 2.2m high railing and gates on front boundary."

**1980:** Approval granted for "Change of use of the basement from church hall to a student hostel."

## Neighbouring Sites

**23-27 Kings Terrace:** Permission granted in October 2005 for "The erection of an additional floor for 2 x 1 bedroom self-contained residential flats"

**11-19 & 23-31 Bayham Street and 8-24 Kings Terrace :** 1993: Permission granted (9300539) for "Redevelopment to provide part 2- part 3-storey buildings on Kings Terrace and Bayham Street comprising 16 residential units 8 parking spaces and garden area"

## Relevant policies

### LDF Core Strategy and Development Policies

National Planning Policy Framework 2012 paragraphs 56 -66 and 129-141.

National Planning Policy Guidance 2016

London Plan March 2016

Mayor's Supplementary Planning Guidance 2016

### Core strategy

CS1 Distribution of growth

CS2 Growth Areas

CS5 Managing the impact of growth and development

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

CS16 Improving Camden's health and well-being

CS17 Making Camden a safer place

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

### Development Policies

DP1 Mixed use development

DP2 Making full use of Camden's capacity for housing

DP9 Student housing, bedsits and other housing with shared facilities

DP14 Tourism development and visitor accommodation

DP15 Community and leisure uses

DP16 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  
DP21 Development connecting to the highway network  
DP22 Promoting sustainable design and construction  
DP24 Securing high quality design  
DP25 Conserving Camden's heritage  
DP26 Managing the impact of development on occupiers and neighbours  
DP28 Noise and vibration  
DP29 Improving access

#### Supplementary Planning Policies

Camden Planning Guidance (CPG) 2015 – CPG 6, 7 and 8  
Camden Planning Guidance (CPG) 2013 – CPG 1, 2, 3 and 4

Camden Town Conservation Area Statement 2007

## **Assessment**

### 1.0 Background

1.1 The applicant is the Camden Town Methodist Church ('CTMC'). CTMC currently has 38 confirmed members, with another 49 Adherents on the community roll compared to 103 in 1985. The lack of members on the community roll means that the Church has had issues in finding appropriate leadership for the Church, and consequently CTMC does not have the appropriate skills to manage the site meaning that the premises are slowly falling into disrepair. The current facilities are capable of holding 850 members, but CTMC has only 38 confirmed members. The existing worship space is therefore much larger than is required by the current congregation. Previously the rooms located at lower ground floor level were used to accommodate four student units. A site visit indicated these were of poor quality and due to health and safety reasons, the use ceased in 2008.

1.2 The applicant has set out that various works are required in order to ensure the long term sustainability, viability and structural stability of the church at Plender Street and to ensure that the building can fulfil a more active role in the local community. The church requires a major upgrade of its facilities in order to improve the accessibility of the premises and the suitability of the community and congregational facilities. The building is also suffering from significant structural problems, which apparently arose as a consequence of the development of the housing to the rear. A steel frame is currently supporting the rear wall of the church (which is structurally unsound).

1.3 The application sets out an intention on the part of the applicant to address four key issues through a comprehensive refurbishment:

- A revised internal layout which addresses its current failure to provide an appropriate venue for the church's ministry aspirations;
- The need to provide for wider community benefit by providing a good quality hall and meeting rooms at reasonable cost for a variety of community groups;
- The need to provide disabled access throughout; and
- The need to repair and make good the structural issues arising from the flank wall.

1.4 The applicant has stated that without significant repair, it is considered that the membership will continue to decline and it is likely that the Church will close within a decade.

1.5 In order to raise sufficient funds to enable the upgrade of the community facilities and to improve the structural stability of the building, the applicants have partnered with the Methodist International Centre (MIC) who trade as The Wesley Hotel. The Wesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference.

1.6 The proposal would include re-providing the existing church space at lower ground floor level and inserting a four storey structure suspended structure within the envelope of the building including the erection of a one and a half storey roof extension to provide a 43 room hotel. The hotel use would provide the enabling finance for the works of repair and refurbishment of the building and its retention in community use. The scheme results in a net uplift in GEA floorspace of 746 sq m.

## 2 Land use

### *Mixed Use Development*

2.1 Policy DP1 sets out that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing in the town centre of Camden Town where more than 200 sq m (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be housing. The net uplift in floorspace is proposed to be 746 sqm. The proposal does not provide residential accommodation.

2.2 Policy DP1 sets out that in considering whether a mix of units should be sought and whether it can practically be achieved on the site, the Council will consider the character of the development, the size, viability and source of funding. A statement has been submitted by the applicant setting out that residential accommodation cannot be provided onsite. The Council considers that the constraints of the existing building, with a proposed hotel use it would be impractical to introduce a residential use onsite. Paragraph 1.15 sets out where a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept an off-site contribution to secondary uses in the same area, directly related in scale and kind to the development proposed, and secured by means of a planning obligation. In the absence of such an agreement the development is unacceptable.

### *Loss of Student Accommodation*

2.3 Policy DP9 sets out that the Council will resist development that involves the net loss of student housing unless either:

k) adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or

l) the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs.

2.4 There were four rooms at lower ground floor level that were previously in use as student units. A site visit indicated these were of poor quality and due to health and safety reasons, the use ceased in 2008. Given the student accommodation has not been in use over the last eight years, the loss of the four student accommodation units is considered to be acceptable.

### *Community Facility*

2.5 Policy CS10 sets out that the Council will '*support the retention and enhancement of existing community ... facilities*' and '*facilitate the efficient use of community facilities and the provision of multi-purpose community facilities that can provide a range of services to the community at a single, accessible location*'. The site is well connected and the applicant has stated that, in their experience, there is a pressing local need for affordable community facilities. The existing church hall is a large volume space, with the vaulted ceiling providing a 10m tall internal height. The raised ground floor congregation hall is ringed by a seating gallery which provides the Church with a total capacity for attendance by 850 people. It was evident during a site visit that the main hall with high vaulted ceiling and balcony seating dates from a period of much larger congregations

than the Church now experiences. The main hall is accessible only via a series of internal and external steps, and the basement level provides a very poor level of amenity for any active use and the layout throughout provides little opportunity for flexibility.

- 2.6 The proposals would rationalise and modernise the community spaces within the building, providing fully accessible and flexible community/church rooms. At lower ground and ground floor levels, the main church hall would be reconfigured to provide a double height community space to meet the needs of the existing congregation and level access leading down to the community use. The congregation capacity is likely to be for approximately 80 people.
- 2.7 The need for local community facilities at a reasonable rate is consistent with the experience of officers in the Regeneration and Partnerships division. The current Community Investment Programme is looking to rationalise council property so that fewer better quality community spaces will be available. This is likely to mean that there will be a greater demand for affordable space for community groups in Camden, and hence the provision of alternative facilities such as is proposed by the Methodist Church would be welcome.
- 2.8 Policy DP15 seeks to protect existing community facilities unless a replacement facility is provided or the local need for such facilities is no longer evident. The applicant has stated that a pressing local need exists and the proposals are specifically aimed at providing an improved community (Class D1) facility. The proposal would protect existing community facility and re-provide enhanced community facilities and the principle of the proposal is considered to be acceptable which could be used not only by the church congregation but also by other community groups.
- 2.9 The applicant proposes to use part of the lower ground floor as a multi-purpose room which would partly be used by the hotel and partly by the community. In order to ensure that the room is to be used by the community, a condition would be attached in the event the proposal would be considered acceptable.

#### *Tourism and visitor accommodation*

- 2.10 Policy DP14 sets out that the Council will support small scale visitor accommodation in town centres including Camden Town. The proposal site is easy to access by public transport, provides drop off and pick up points and does not harm the mix of uses in the area. As such the proposed hotel use is considered to be appropriate in this area.
- 2.11 The principle of the hotel use in this location which would support the needs of the existing Methodist Church community by improving the structure of the existing building and re-providing enhanced community use is considered to be acceptable in principle.
- 2.12 However Paragraph 129 of the NPPF states that local planning authorities (LPA) should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. LPAs should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Although the proposal is considered to be acceptable in principle, in land use terms, this does not overcome the concerns expressed in the design and conservation section below.

### **3.0 Design and Conservation**

- 3.1 The existing church is described in the Camden Town Conservation Area Appraisal and Management Strategy (CTCAAMS) as built as the New Camden Chapel in 1889, by T & W Stone. The facades are of stock brick with stucco dressings in a debased classical style, accentuated by the

pedimented front entrance. The site sits in sub area 1 which is the commercial sub area consists of a traditional wide shopping street linking the busy junction at Mornington Crescent to the eclectic and lively town centre at the heart of Camden Town. The Conservation Area has a high proportion of 19th century buildings both listed and unlisted, which make a positive contribution to the historic character and appearance of the Conservation Area. The site is noted to make a positive contribution in the Camden Town Conservation Area.

### 3.2 The proposal includes the following

- The erection of a roof extension which is considered to be necessary in order to accommodate a viable scheme
- The proposal seeks to provide a new structure within the envelope of the existing building
- The reconfigurations of internal levels to accommodate the church function and the hotel use
- Associated external alterations to provide level access at street level

3.3 S.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in relation to conservation areas requires that “..Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Where harm to the character and appearance of the conservation area has been identified as a result of this development proposal the Council must give this harm considerable importance and weight in their balanced judgement of the application

3.4 Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

3.5 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets (NDHA), a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.6 Paragraph 134 of the NPPF is clear that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

3.7 Policy DP25 outlines that only permit development within conservation areas that preserves and enhances the character and appearance of the area;

3.8 Camden Planning Guidance 1 (Design) sets out that the significance of ‘Non-Designated Heritage Assets’ (NDHAs) will be taken into account in decision making

#### *Proposed Roof Extension*

3.9 The existing roof form is an original tiled pitch typical of a 19<sup>th</sup> century church. The proposal includes a new roof which is proposed to be cladded in standing seam zinc the proposed extension is 1.5 storeys which includes an additional floor and planting.

3.10 CTCAAMS states fundamental changes to rooflines and insensitive alterations can harm the historic character of the roofscape and will not be acceptable. The proposed massing is prominent in views from the surrounding Camden Town Conservation Area, particularly in views looking east. Attempts have been made in the proposed design to reference a traditional roof form; however the proposed roof form is considered to be inappropriately bulky and appears to have an incongruous relationship with the host building. The fenestration facing Plender Street within the proposed roof does not in any way relate to the host building appearing to be dominant and unsympathetic. The

proposed roof appears to be somewhat alien, unsympathetic and uncharacteristic of this part of the conservation area. It is considered that the proposed design will lead to less than substantial harm to the significance of the Camden Town Conservation Area.

3.11 Paragraph 134 of the NPPF states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

3.12 The site is currently in use by the church and the applicants have not demonstrated that it would be unfeasible for a scheme which would do less harm to the building and the conservation area whilst maintaining the church use. Therefore the proposal does not meet the test set in paragraph 134 of the NPPF above.

3.13 There is benefit to the proposed scheme which would re-provide enhanced community facility for the user group. The Council recognises that The Wesley Hotel claims to be an ethical business but there is nothing to suggest that the approach taken by the Wesley Hotel is so significantly different to other hotel operators that the benefits of their achieving a new venue in Camden outweighs the harm to this site and the conservation area. The applicant has not demonstrated that the less than substantial harm that would arise from this particular scheme is necessary to achieve the main public benefit of retaining the church use with enhanced community facilities. These are not substantial public benefits that outweigh the harm.

3.14 The existing building is noted as a positive contributor and therefore can also be considered a non-designated heritage asset. The loss of the historic roof form to be replaced with such an unsympathetic roof form would result in detrimental harm to the non-designated heritage asset. The proposal does not sustain and enhance the significance of the non-designated heritage asset (NDHA) and fails to explore viable uses that would be consistent with its conservation.

#### *Relationship between the internal structure and external façade*

3.15 Significant concerns have been raised in relation to the proposed internal structure which is to be suspended within the existing envelope of the building and its relationship to the streetscape. There is significant concern that when looking into the building from the street, an onlooker would see floor plates or structures. The proposed internal structure would sit oddly with the fenestration and therefore the relationship between the proposed internal structure and the retained external façade would be incongruous and would harm the surrounding conservation area.

#### *External alterations*

3.16 The proposal includes alterations to the front elevation which include the removal of the existing steps to create level access. This in turn results in alterations to the opening and as a result of the changes the classical proportion of the door and the columns are distorted. It is considered that the proposed alterations would harm the special character of this positive contributor.

3.17 It is considered that the proposed roof form and fenestration, the relationship between the proposed internal structure and the external fabric and the external alterations would harm the conservation area and the significance of the non-designated heritage asset. It is considered that the significant alterations being proposed at this site is to accommodate a particular business model. The proposed use is not considered to be the optimal viable use for this site and the proposal does not bode well with the long term conservation of the site. As such the proposal is considered to be unacceptable in design terms.

## **4.0 Amenity**

### *Daylight and sunlight*

4.1 An External Daylight and Sunlight Report has assessed the implications of sunlight and daylight on surrounding properties. The report concludes that the VSC, ADF and No-sky/daylight distribution analysis indicates that all but two windows pass at least one of the BRE studies. The neighbouring windows will automatically remain adequately lit in the majority as a result of the development proposals and will comply with the BRE criteria in the urban context.

#### *Privacy and Outlook*

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

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

#### *Hotel Management*

4.4 The draft Hotel Management Plan has been prepared to accompany the planning application submission. This provides an overview of how the hotel will be managed, including details of managing visitors, staff and deliveries. It is proposed that further detail could be provided, as required, ahead of occupation. This would be secured through a Section 106 legal agreement in the absence of such an agreement the development is unacceptable.

#### *Noise*

4.5 The proposal includes plant within the mansard roof. The Noise Assessment demonstrates the proposed plant would not result in unacceptable noise levels and is therefore considered acceptable.

### **5.0 Transport**

5.1 The site has a public transport accessibility level of 6a (highly accessible). Visitors and staff are expected to walk and cycle to the site. The proposal accords with London Plan Policy 6.1 and Camden Policies DP16 and DP17.

5.2 Should the proposal be considered acceptable a hotel management plan would require details to be submitted of pick up and drop off points which would be secured through a Section 106 legal agreement. In the absence of such an agreement the development is unacceptable.

5.3 Given the extent of the proposed works, officers consider that a highways contribution would be required should the proposal be considered acceptable. In practice this would repair any damage to the public highway as a result of the proposal. This would need to be secured by way of a s106 legal agreement. In the absence of such an agreement the development is unacceptable.

5.4 In order to ensure the highway and pedestrian network and the amenity of neighbours is not unduly impacted upon during construction a construction management plan will be required. In the absence of a s106 agreement the proposal would be unacceptable.

### **6.0 Waste and Recycling**

6.1 A refuse store would be located internally at lower ground level providing 2 x 1100 L Eurobins (for general waste and recycled material) and 1 x 500 L Eurobin (for food waste) this is found to be in accordance with Camden's Waste Standards set out in CPG1. One existing window on the King's Terrace elevation will be converted to a door to allow for refuse and recycling to be put out for collection and any deliveries to be brought into the building. It is proposed that any waste and recycling

will be put outside the building 30 minutes before Camden's waste collection times (06.00, 18.00 or 00.00) should a collection be required that day. This approach to waste collection is considered to be acceptable.

## **7.0 Energy and Sustainability**

7.1 Policy DP22 (e) expects non-domestic developments of more than 500 sqm floorspace to achieve "very good" in BREEAM assessments. CPG3 (Sustainability) goes into more detail on each subcategory within the BREEAM assessment, and expects a minimum score of 60% in the energy category, 60% in the water category, and 40% in the materials category. The planning statement has considered energy and sustainability requirements set out in Policy DP22.

7.2 The London Plan states that proposals make the fullest contribution to minimising CO2 emissions in accordance with a Be Lean (use less energy), Be clean (supply energy efficiency) and Be Green (use renewable energy) hierarchy. Furthermore a reduction of at least 35% CO2 emissions below the building regulations part L 2013 baseline.

The development achieves the following in the hierarchy

'Be lean' – a 16.4% decrease in CO2 emissions over Part L of the 2013 Baseline.

'Be clean' - a 35.34% decrease in CO2 emissions over Part L of the 2013 Baseline

'Be green' - As the 35% reduction has already been achieved no 'be green' measures are necessary

7.4 The scheme is therefore considered to be capable of being acceptable with regard to sustainability. Nonetheless, a sustainability plan would need to be secured by way of s106 legal agreement to ensure that the development still complies post construction. In the absence of such an agreement the development is considered to be unacceptable.

7.4 The Council expects developments to achieve a reduction in CO2 emissions of 20% from on-site renewable energy generation unless it can be demonstrated such provision is not feasible (policy CS13 paragraph 13.11). It has not been demonstrated the provision is not feasible if permission were to be granted a clause would be included in the legal agreement securing an energy strategy which would include details of on-site renewable energy facilities. In the absence of such an agreement the development is considered to be unacceptable.

## **8.0 Public open space**

8.1 Policy DP31 requires proposals that generate an additional demand for public open space to make a contribution to offset the pressures the development would bring upon public open space in the area. The net increase in floorspace and additional hotel guests attracted to the area are likely to generate additional demands on available open space in the area and a contribution calculated in line with the methodology set out in CPG6 (amenity) would be sought. It is likely this would be spent on relevant public realm improvements in the area .

8.2 In accordance with paragraph 11.3 of CPG6 (Amenity), the Council will expect a contribution towards public open space. This is as the development adds over 500sqm of floorspace and will increase the worker and visitor populations of the borough and demand for public open space.

8.3 The development will be expected to contribute 18sqm of open space per double room, therefore in this instance 1008sqm (18sqm x 56 double rooms) of open space would be required. Given the confined nature of the site, it is acknowledged that provision would not be possible on-site and there are no other acceptable sites nearby, therefore a contribution towards the provision of new or enhancement of existing open spaces would be required.

8.4 Following the advice set out in CPG6 (paras. 11.33 – 11.41 and appendix C), this non-residential



development providing 40 double rooms would be required to contribute (per room) £593 [Capital cost ], £594 [Maintenance] and £71 [Design and admin], in total a contribution of £54094 would be required. In the absence of a s106 legal agreement securing this contribution the scheme is considered to be unacceptable due to the adverse impact on public open space provision.

## **9.0 Community Infrastructure Levy**

9.1 The proposal would be liable to CIL as it creates more than 100 sqm of floorspace. The Mayoral CIL would be £34,800 and the Camden CIL would be £20,880.

## **10.0 Recommendation**

**10.1** The principle of the proposal to provide a hotel use so that the community use could be enhanced and re-provided is considered acceptable. However the proposed massing and the proposed internal structure and the alteration to the front elevation would result in significant harm to the conservation area. Officers therefore recommend the application to be refused.



# APPENDIX 5



ALEX LENTATI

**Campaign:** Tolu Stedford, Nicholas Kynaston, Kathy Perkis and Charlene Hutsebaut at St Andrew's Church and Hammerton Hall, in Stockwell, which need £4m of repairs

## Demolition fears for 250-year-old church 'too costly to repair'

**Ben Morgan**

ONE of the oldest working churches in south London could be demolished and turned into flats after the Church of England today said it was too expensive to repair.

St Andrew's Church, Stockwell, is set to celebrate its 250th anniversary but urgently needs more than £4 million in repairs to make it safe and secure.

Residents and community groups fear the church and the adjacent Hammerton Hall could be knocked down and replaced by flats. They have urged the Church of England to protect the building when it lodges a planning application with Lambeth council.

Charlene Hutsebaut, chairwoman of the Oak Square Residents' Association, said: "The parish was started in 1767 and we are worried about the possibility it will be demolished and replaced with a huge building site.

"We think it is a shame such a beautiful structure and something so old could be torn down.

"The latest from the diocese was to redevelop the site by tearing down the church and the hall behind it.

"As residents we are extremely worried that we may end up having a mas-

sive tower block beside us which will be higher than the current four-storey buildings. We understand they need to carry out repairs and modernise it and the church might not have the money to do it. But it feels we're caught between a rock and a hard place."

The church is not listed because the exterior was extensively altered more than a century ago to give the appearance of a Victorian structure, which means it does not fit heritage criteria.

The Diocese of Southwark said it was working with groups in the area to come up with designs which would include community space.

A spokeswoman said: "The church and hall at St Andrew, Stockwell, need over £4 million spent on them to make them safe and watertight, but this would not bring them up to modern standards for use by the community.

"The parish has been in close consultation with the local community and whilst there are no finalised plans at present, the priest-in-charge hopes to work closely with Lambeth council to provide a church and community space for all to use.

"The site may include some dwellings which would be in keeping with the rest of the area."

@IBen\_Morgan

# APPENDIX 6

# Camden Town Methodist Church – supplementary information to satisfy Development Management Policy DP15.

---

## RELEVANT POLICY TESTS

As detailed within the planning submission material, the existing building provides 557 sq m of dedicated worship space (use class D1); which we understand is defined as a community use by Camden for application of Policy DP15.

Core Strategy Policy CS10 and the London Plan Policy 3.16 are also relevant in relation to community facilities and social infrastructure.

The lawful use of the lower ground floor is student accommodation (C2); though this use had to cease in 2008 due to health and safety concerns with the accommodation.

The area of existing D1 space is 557 sq m (the current inefficient use of this space is described below). The proposals seek to retain 25% of the existing community floorspace (87 sq m as dedicated worship space) and 49 sq m as shared flexible space that will be available to wider community groups in new modern, safe facilities with appropriate sanitation facilities.

Development Management Policy DP15 sets out policy in respect to the loss of existing community facilities.

The proposals are not considered to constitute the loss of an existing community facility, as explained in the Planning Statement, but rather to introduce a hotel and ancillary uses to serve as the enabler to facilitate the necessary repairs to the building.

As set out in the Planning Statement, DAS and Structural Report, the church building is in serious need of physical repair. The cost of repairing the rear wall and other structural works to ensure the building is made structurally sound is estimated at **£2.02 million** (Cushman & Wakefield cost plan).

The cost each month to lease the parking space to enable the shoring up of rear wall is currently c. £2,500. This expense utilises the Church's limited funds.

Camden Town Methodist Church is within the Islington and Camden Mission Circuit, which comes under the oversight of the Methodist Conference. There is no funding available within the Church, the Circuit or Methodist Conference to fund the necessary repairs of the building.

The Church has looked to external sources (see below) that retain a quantum of community floorspace for the church and its outreach activity. Accordingly we do not consider it is appropriate to assess the proposals against Policy DP15 parts (c) and (d). Notwithstanding this, in response to your further comments we have done so below – to demonstrate the reduction in community space would still accord with the policy criteria.

*The Council will protect existing community facilities by resisting their loss unless:*

*c) a replacement facility that meets the needs of the local population is provided; or,*

The existing church building provides for the Methodist Church and two other congregations (Korean and Brazilian). This use of the building brings a very small income to the Methodist Church.

## Camden Town Methodist Church – supplementary information to satisfy Development Management Policy DP15.

---

Until 2008 the lower ground had been let out as affordable student accommodation (C2). As explained in the Planning Statement (Section 2.3) this use and its associated revenue stream ceased as the area was deemed unsafe.

The Church is unable to rent out their building to other community or commercial groups due to its lack of toilet and kitchen facilities and the overarching health and safety issue of the rear wall. It has not therefore been marketed for use by other community groups as it is not considered practical for such purposes.

The use of the existing community space (557 sq m) is therefore limited at present.

The area of re-provided worship space will enable space for up to 80 people. The current practising congregation (confirmed members) is 38. The retained dedicated worship space will be of an appropriate space and standard for the Methodist congregation – it is also proposed that the facility will continue to be offered to the other practicing congregations, both of which are similar in size to the Methodist congregation. Upgrade of the facilities will enable the community space to be let to other community groups in addition to the congregation. The multi-purpose room is intended to be made available to other groups within the community.

In addition, Camden Town Methodist Church will use some of the rent from the hotel use to employ a full-time community worker who will work from the church office. The church has committed itself to this proposal.

The replacement facility will therefore meet the needs of the local population in accordance with Policy DP15 (c); improving the current provision of the facility albeit in a more efficient space.

*d) the specific community facility is no longer required in its current use. Where this is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site. Where this is successfully demonstrated, the Council's preferred new use will be affordable housing.*

The specific community facility is still required as explained above, but does not require the same amount space. The proposals will bring significant improvements to the community area and make this more widely available, as a result.

The deteriorating condition is however impacting its ability to serve the church congregation (the reduction in numbers is detailed in the Planning Statement). Its ability to serve the wider local community has already ceased due to the health and safety issues related to the building structure.

The redevelopment proposals will fund the very necessary repair of the building (c. £2.02 million to make the building structurally sound). In doing so they re-provide the community facility in a more efficient format that requires less floorspace.

In addition, the re-provided community use will provide for other suitable community uses on the site. The proposals will not result in a shortfall in provision rather will increase the floorspace available for the local community. Due to the reasons outlined above, we consider that the proposal satisfies policy tests (c) and (d) of Policy DP15.



# Camden Town Methodist Church – supplementary information to satisfy Development Management Policy DP15.

## ASSESSMENT AGAINST DP15 SUPPORTING POLICY TEXT

Para 15.6 – 15.8 set out supporting guidance on Policy DP15. Para 15.6 repeats strands (c) and (d) of Policy DP15. It also adds a further requirement where proposals involve the loss of a community facility:

*‘Provide marketing evidence to show that the premises have been offered at a reasonable charge to community groups or voluntary organisations over a 12 month period. Existing community facilities should be offered to potential new users on the same financial basis as that of the previous occupancy. If there were no recent users, the space should be offered at an appropriate rate for community groups/ voluntary sector organisations’.*

As outlined above, the Church is unable to rent out their building to other community or commercial groups due to its lack of toilet and kitchen facilities and the overarching health and safety issue of the rear wall. It has not therefore been marketed by uses for other community groups as it is not considered practical for such purposes.

The re-provided space, and in particular, the multi-purpose room will be made available for other community groups and a dedicated full-time community worker is being provided as part of the agreement between Camden Methodist Church and the Wesley.

Para 15.8 sets out that sites in community use generally have a relatively low capital value compared with housing sites. This paragraph relates to positions where community uses have ceased and it has been demonstrated that there is no need for continued community use. In such instances, the Council’s preferred use is affordable housing.

As outlined above, community uses have not ceased in their entirety at the site and the proposals re-provide community space for both the church and wider local community. Notwithstanding this, we understand the Council have queried what other options (including residential) have been explored at the site.

Section 2 and Appendix 1 of the Planning Statement set out that the Church have explored alternative options for redeveloping the site, as the Church and Circuit are not in a position to fund the necessary repairs without external funding. As also explained at Para 2.7 of the Planning Statement and within Appendix 1 the Church has already considered a number of alternative ways of developing the premises but all other possibilities are unworkable, either because they would require funding that is not available or the sale of the premises to another organisation. For clarity these options included:

- **Residential** - as explained at Para 1.4, 2.8 and 4.5 – 4.7 of the Planning Statement, residential proposals were progressed to planning submission previously (ref: 2010/4319/P). However, for the reasons outlined at 4.7 the scheme was not progressed towards determination, namely:
  - The proposed scheme retained insufficient, appropriate worship space;
  - The building would no longer be under the ownership of the Methodist Church\*;  
and,
  - The congregation did not have the facility or skills to successfully manage the project if it stayed within their ownership.



## Camden Town Methodist Church – supplementary information to satisfy Development Management Policy DP15.

---

\*The Islington and Camden Mission Circuit is not prepared to relinquish the site because of its situation in the heart of Camden Town and because no other suitable sites would be available at a cost that the Circuit could afford.

- **Grant funding** – The current Superintendent Minister, Revd Timothy Bradshaw, has had previous experience of seeking Heritage Lottery Funding for a Grade II listed building with no success what-so-ever. Although Camden Methodist Church building is noted to make a positive contribution to the Conservation Area it is not statutory listed.
  - It should be noted that the Heritage Lottery Fund ‘Grants for Places of Worship’ funds urgent structural repairs to Grade I, II\* and II listed places of worship in England. Camden Methodist Church is not listed and thus does not fall into this category. Moreover, the church cannot meet the qualifying requirements needed to qualify for Heritage Lottery funding in any event.
  - Grant funding is only available up to a value of £250,000 (if the full amount were received). Whilst this would be of assistance there would still be a significant funding gap; for which the church cannot meet.

If this scheme does not go ahead, the premises are likely to continue to deteriorate until they become unsafe even for the church congregation. At this point, it would be necessary to try and sell it on the open market. In addition, as explained in the Planning Statement and Appendix 1, it is expected that membership will continue to decline if the church stays in its current physical condition and will close within a decade.

### RELATIONSHIP OF THE PARTIES

- Camden Town Methodist Church is within the Islington and Camden Mission Circuit, which comes under the oversight of the Methodist Conference. There is no funding available with the Church, the Circuit or Methodist Conference to fund the necessary repairs of the building.
- The Wesley (known also as the Methodist International Centre [‘MIC’]) offer the opportunity to bring external funding for the needed repairs whilst retaining a proportion of worship space and enabling the Church to retain ownership of the site.
- As reflected by the name the MIC is part of the Methodist Church.
- It is proposed that managing trusteeship of Camden Town Methodist Church transfer to the Methodist Council, with the redeveloped property to be leased at full market rent to MIC Ltd and operated by MIC Ltd as a hotel.
- The board of MIC Ltd and the Network Committee are seeking to develop the company’s operation on other sites, particularly existing Methodist properties with a view to increase the profits of MIC Ltd, which will in turn be passed to the Methodist Church for its general purposes.

## Camden Town Methodist Church – supplementary information to satisfy Development Management Policy DP15.

---

### SUMMARY

The introduction of the hotel uses on the upper floors therefore brings to the Church:

1. The external funding required to make the building structurally sound; this is potentially the last opportunity to ensure the retention of the building and its community use. The cost of repairs are such that the investment value of the site is negligible and future owners/developers would seek to cease the community uses in favour of commercial only uses in order to generate the funds to meet the repair costs. In the medium term, the building will deteriorate to the point where it is no longer economically viable to repair.
2. Retained dedicated worship space of an appropriate quantity and standard for the Methodist congregation – it is also proposed that the facility would be offered to the other practicing congregations.
3. Upgrade of facilities to enable the community space to be let to other community groups in addition to the church.
4. Enables the building's freehold to be retained by the Church securing its long term future in Camden Town.
5. An income stream for the Church which will fund a dedicated community worker who will share an office (on the upper floors) with the church minister.

# APPENDIX 7

**From:** Freeney, Fergus [<mailto:Fergus.Freeney@camden.gov.uk>]  
**Sent:** 20 October 2016 18:06  
**To:** Willmott, Paul @ London HH; McDonald, Neil; Powell, Antonia  
**Cc:** [stevefox@manaloandwhite.co.uk](mailto:stevefox@manaloandwhite.co.uk); [brian@manaloandwhite.co.uk](mailto:brian@manaloandwhite.co.uk); Blunstone, Hannah @ London HH; Everard, Charlotte @ London HH  
**Subject:** RE: Camden Methodist Chapel

Hello All,

Antonia and I have discussed the revised proposal and we feel it is now at a stage where we can accept a planning application; we do not feel another site visit will be necessary.

The only concerns we have are that the lift overrun detracts from the roofline and we would strongly encourage alternative solutions to this – can a lift without an overrun not be explored?

There is also no mention of the lighting treatment of the windows - it was suggested on site that directional lighting could “mask” the impact of the various change of levels in the lit interior.

If you could take the above issues into account and submit an application via the planning portal (and let me know when you’ve done this) I’ll pick up and register it etc.

Kind regards,

Fergus Freeney  
Senior Planning Officer

Telephone: 020 7974 3366