



GERALDEVE

Planning and Building Control
London Borough of Camden
5 Pancras Square
London
N1C 4AG

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldev.com

FAO: Rob Tulloch

14 March 2017

Our ref: GAO/HBR/J7780

Your ref: 2016/7062/P & 2017/0045/L

Dear Sir

**27 Montague Street, London – Response to Objections
Planning and Listed Building Consent Refs. 2016/7062/P & 2017/0045/L**

We write on behalf of our client, the Bedford Estate, to respond to the letter of representation received from Metropolis (Planning and Design) on behalf of the occupiers of 27 Montague Street, London, in respect of planning and listed building consent application refs. 2016/7062/P & 2017/0045/L.

There are a number of matters raised in the letter of objection that were of concern to our client and accordingly a letter of response is provided to clarify matters.

General Clarifications

The impact of the proposals on local businesses and the resulting removal of the existing occupier, appear to be overarching concerns raised within the objection letter.

The Planning System: General Principles produced by the Office of the Deputy Prime Minister and issued in January 2005, sets out some general guidance about the determination of planning application and relevant material considerations.

The guidance is explicit that private interests are not a material consideration in the determination of planning applications. It states at paragraph 29 that **“the planning system does not exist to protect the private interests of one person against the activities of another ... The basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings which ought to be protected in the public interest.”**

The objection letter also seeks to argue that hostel accommodation should be protected as it is providing a particular low cost accommodation. It is worth noting that Policy DP14 of Camden's Development Management Policies does not differentiate between different categories or provisions of visitor accommodation. Accordingly, the policy cannot be interpreted differently in relation to different forms of visitor accommodation (as defined in paragraph 14.3 of Camden's Development Management Policies).

It is also worth noting that the Council have been consulting on a new Local Plan which, once adopted, will replace the currently adopted Core Strategy and Development Management Policies. The Local Plan is currently going through examination and the Council intend to adopt the Local Plan in summer 2017. Accordingly, it is becoming a material consideration in the determination of planning applications. The emerging plan is clear that the priority use across the Borough is housing.

To support this position, Policy H1 of the emerging Local Plan seeks to maximise housing supply across the Borough in order for Camden to reach their London Plan targets. Policy H2 of the emerging Local Plan, seeks to maximise the supply of self-contained housing from mixed use schemes. The supporting text, at paragraph 3.41, states that *"Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought"*.

Whilst this policy relates to mixed use developments, it is clear that the overarching aim is to increase the provision of housing within developments. The Applicant's application will help to achieve this aim.

Policy E3 of the emerging Local Plan states that the Council will *"protect existing visitor accommodation in appropriate locations. All tourism development and visitor accommodation must:*

- f. be easily reached by public transport;*
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;*
- h. not harm the balance of uses in the area, local character, residential amenity, services for the local community, the environmental or transport systems; and*
- i. not lead to the loss of permanent residential accommodation"*.

As set out above, the emerging policy only seeks to support visitor accommodation where it can satisfy all of the above criteria. Whilst 27 Montague Street can be easily reached by public transport, the existing property does not provide pickup and set down points. In addition a consultation response was received from a resident at 29 Montague Street identifying that the existing hostel use resulting in a *"large group of tourists congregating not only outside the hostel but outside our residence shouting, drinking smoking until all hours"*. This suggests that the existing use harms the residential amenity of the area. Accordingly, it is not considered that the existing accommodation would be supporting by emerging policy as it would not meet all of the above criteria.

Specific Clarifications

At paragraph 2.4 of the objection letter, it is stated that the applicant's submission is misleading about the support of officers to the proposals. This is not the case. Pre-application advice from London Borough of Camden officers in 2011 and 2016 confirmed support for the proposals, in principle.

The following paragraphs of the letter relate specifically to the Hostel Market Review which was submitted with the application. We have reviewed the comments raised in the objection letter and set out our response below.

In terms of overnight accommodation, the London Plan encompasses the wider London Market and not just central locations; as such we have examined the wider London market. According to

AM:PM there are currently 69 hostels in the London market. Additionally, according to AM:PM, over the last five years, there has been an increase in hostel supply of 26% in London.

In addition to the significant increase in supply in the London market in recent years, Camden has the second largest representation of hostel rooms when compared to other London Boroughs, reflecting 4% of total room stock in the borough.

Borough	Hostel
Southwark	6%
Camden	4%
City Of Westminster	2%
Tower Hamlets	2%
Kensington and Chelsea	1%
City of London	1%
Lambeth	1%
Newham	0%

Source: AMPM, March 2016

The tenant's agent suggests that the market report submitted with the planning application states that Camden is oversupplied in terms of hostel accommodation. For clarity, our report suggests that hostel accommodation is growing in London and there is an increasing demand for 'new generation hostels'. This is further reinforced by the increase in supply of hostels in the last five years.

The market report submitted with the application also made reference to a number of new generation hostel companies. The operators are UK and European operators which it is considered would be interested/have active requirements in the London market or have an existing UK representation.

In regard to price comparison, the tenant's agent's report has compared the hostel pricing at 27 Montague Street, to a number of budget/2 star hotels/hostel operations. We believe there are more comparable properties nearby, such as the Imperial hotels, which provide pricing from £54.00 - £99.00 (mid- May). Furthermore, we believe the Premier Inn/Travelodge's near Kings Cross/Euston would provide a more accurate comparison to the subject hotel than the Covent Garden hotels they refer to. We detail the rates below.

Hotel	Mid May Rate
Imperial - County	£54.00
Imperial - Tavistock	£83.00
Imperial - Royal National	£88.00
Premier Inn - Euston	£70.00
Travelodge - Royal Scot Kings Cross	£48.00

The market report submitted with the planning application stated that **‘Listed buildings, which were not built to accommodate high footfall.’** We believe that this statement may have been misconstrued.

We were referring to the fact that a number of hostel conversions that have taken place across London, have done so within buildings that were previously designed for high footfall use e.g. public houses, offices, courthouses, schools etc., whereas the subject premises were not designed for high footfall and high occupancy accommodation. A townhouse doesn’t lend itself to an efficient hostel operation and high intensity use. Accordingly, we detail the hostels below, put forward by the operator, a number of which are incorporated into pubs/office conversions which lend themselves much better to a hostel operation. Photos of these hostels are attached as appendices to this letter.

Astor Museum Hostel		
Property	No of Rooms	Use Class
1 - Clink 78	100	Courthouse
2 - Indian YMCA	120	Purpose Built
3 - Meininger	48	
4 - Rest Up Hostel	140	School Conversion
5 - Safestay- Elephant and Castle	74	Townhouse
6 - Safestay Holland Park	30	School Conversion
7 - Smart Russell Square	60	Townhouse
8 - St Christopher's Inn Borough High Street	10	Pub
9 - St Christopher's Inn Greenwich	9	
10 - St Christopher's Inn Hammersmith	15	Bar/Restaurant
11 - St Christopher's Inn Liverpool Street	6	Pub
12 -YHA St Paul's	50	School

Source: Gerald Eve

As set out above, hostel supply is increasing in London. Camden has the second largest representation of hostel rooms when compared to other London Boroughs. Housing is the priority use within the Borough and demand is currently considerably outstripping supply. Accordingly, the opportunity should be taken to enhance these listed buildings whilst providing much needed residential accommodation.

At paragraph 4.11 of the letter Metropolis state that it is not clear what ‘material consideration’ would outweigh the provision of Policy DP14. Notwithstanding the above Hostel Market Review, which we consider to be a significant material consideration, the objection letter does not take into consideration the heritage benefits of the proposals, which are a further significant material consideration.

The objection letter, at paragraph 4.18, states that by approving the application, the Council would be undermining the principle of protecting all visitor accommodation in favour of higher value uses. This is not the case. The Council would be granting planning permission on the basis that the proposed development would not impact the provision of visitor accommodation in the area, would enhance the heritage significance of the properties and provide a priority land use in line with planning policy.

Within section 9 of the letter, Metropolis argues that the Astor's guests are encouraged to use food and beverage facilities outside of the hostel which helps to support local businesses. It is important to note that any new occupiers of the proposed residential units would also likely use the local facilities (businesses and shops) which are necessary to form part of a successful residential neighbourhood. It would seem more likely that residential occupiers would use the local facilities on a more regular basis than someone visiting the area as a tourist who would also frequently use facilities outside of the locality. Furthermore, and as set out within the objection letter, the existing accommodation is cheap which suggests that the spending power of the guests is likely to be restricted.

Section 10, of the objection letter, deals specifically with hostel and listed buildings. Whilst it is noted that a number of hostels operate from listed buildings, no evidence has been provided to suggest that a hostel use does not harm the historic significance of the listed building. As set out in the Hostel Market Report, the extremely high volume of guests within a hostel has a detrimental impact on the property. The Heritage Assessment submitted with the application also identifies that the use has resulted in a considerable amount of modern partitioning.

At paragraph 10.6 of the objection letter, Metropolis seeks to argue that reintroducing a residential use would likely result in an equal material impact on the listed building. This is fundamentally and factually incorrect. The proposals to convert the property back into its original and historic residential use would allow the substantial enhancement of the architectural and historic interest of the building through:

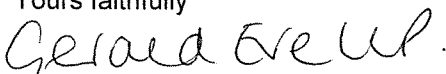
- Restoring the general plan form and principal rooms;
- Removing intrusive surface mounted services;
- Restoring the existing shutters to full working order;
- General and high quality internal refurbishment of the property.

Summary

The proposals would secure the provision of three residential units, which are a priority land use within the Borough. The proposals would result in appropriate mix of residential units, including the provision of family housing. Therefore, the proposals are considered to accord with planning policies at all levels.

We trust that this letter provides a useful response to the objections raised. If you require any further clarification in respect of these details please do not hesitate to contact Graham Oliver or Hannah Bryant of the above office.

Yours faithfully



Gerald Eve LLP

goliver@geraldev.com

Direct tel. +44 (0)20 7333 6315

1 - Clink 78



2 - Indian YMCA



3 - Meininger



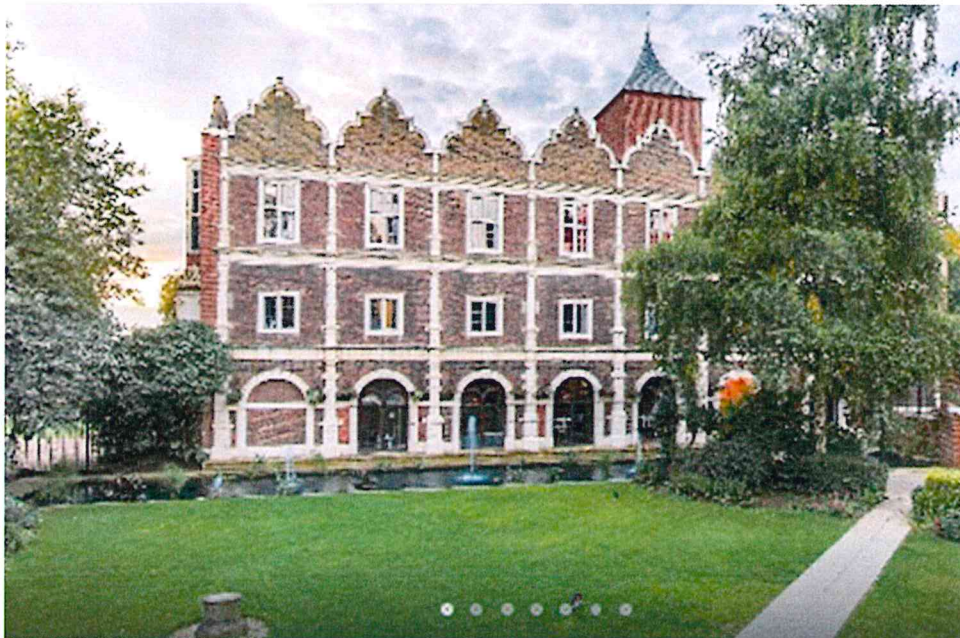
4 - Rest Up Hostel



5 - Safestay- Elephant and Castle



6 - Safestay Holland Park



7 - Smart Russell Square



8 - St Christopher's Inn Borough High Street



9 - St Christopher's Inn Greenwich



10 - St Christopher's Inn Hammersmith



11 - St Christopher's Inn Liverpool Street



12 -YHA St Paul's

