

<b>Address:</b>	Camden Methodist Church 89 Plender Street London NW1 0JN		<b>8</b>
<b>Application Number(s):</b>	2016/6490/P	<b>Officer:</b> Gavin Sexton	
<b>Ward:</b>	Regents Park		
<b>Date Received:</b>	25/11/2016		
<b>Proposal:</b> Change of use at upper floors to a 39 room hotel (Class C1). Internal alterations to existing place of worship (Class D1); Change of use of lower ground student accommodation (Class C2) to provide replacement worship space (Class D1) and associated community and ancillary hotel space; Shared entrance at upper ground floor level; Associated roof extension and alterations to main façade, side entrances and windows			
<b>Background Papers, Supporting Documents and Drawing Numbers:</b> (859_03/03/)0219 P8; 0220 P8; 0221 P6; 0222 P6; 0223 P6; 0224 P6; 0225 P6; 0510 P6; 0511 P6; 0512 P6; 0513 P6; 0514 P6; 0255 P8; 0600 P6; 0601 P6; 0602 P6; 0603 P6; 0800 P2; 0801 P2; 0802 P2; 0803 P2 (859_03/01/)0100 P1; 0219 P1; 0220 P1; 0221 P1; 0500 P1; 0501 P1; 0600 P1; 0601 P1; 0602 P1; 0603 P1 <b>Deliverability and Viability Statement (November 2016); Planning Statement (November 2016); BREEAM Pre-Assessment (December 2015); Operational Management Statement (16<sup>th</sup> November 2016); Plant Noise Assessment (17<sup>th</sup> November 2015); Heritage Statement (November 2016); Preliminary Risk Assessment (November 2016); Daylight and Sunlight Study (3<sup>rd</sup> November 2015); Covering Letting (25<sup>th</sup> November 2016); Design and Access Statement (November 2016); Construction Management Plan.</b>			
<b>RECOMMENDATION SUMMARY:</b> Grant conditional planning permission subject to a section106 Legal Agreement			
<b>Applicant:</b>		<b>Agent:</b>	
Camden Methodist Church 89, Plender Street LONDON NW1 0JN		CBRE, Henrietta House Henrietta Place London W1G0NB	

## ANALYSIS INFORMATION

Land Use Details:				
	Use Class	Use Description	Floorspace GIA sqm	Floorspace GEA sqm
Existing	D1 Non-Residential Institution (including Student Accommodation (class C2)		751	961

Proposed	<i>C1 Hotel</i>	942	
	<i>D1 Non residential Institution</i>	114	
	Multi-purpose/shared floorspace	326	
	<b>TOTAL</b>	<b>1382</b>	<b>1537</b>

## OFFICERS' REPORT

### *Preamble*

- 1.1 This application was presented to Planning Committee on 11<sup>th</sup> May 2017. Committee resolved to grant conditional planning permission subject to a s106 legal agreement to secure the Heads of Terms set out in the 2017 officers report. Members' resolution added a further Head of Term to make the permission personal to the applicant. The minutes of the Committee are in **Appendix A**.
- 1.2 In the interim, during the negotiation of the detailed wording of the legal agreement, the applicant advised that the personal consent obligation added to the resolution would prohibit implementation of the scheme.
- 1.3 Officers acknowledge the applicant's concerns and consider that an alternative mechanism would secure the planning purpose of the personal permission while removing the obstacle to implementing the development. While the overall recommendation in this report remains the same as was considered by the planning committee in 2017, the following material considerations/changes have occurred:
  - Local Plan has been adopted
  - Applicant agreed to additional s106 legal agreement head of term to provide community facilities at community rates
  - Alternative mechanism found to replace 'personal permission'
  - Viability of scheme re-appraised with 2018 figures and additional indicative assessment of viability carried out on mixed hotel/housing development
- 1.4 Officers consider that these considerations and the amended recommendation require the application to be presented afresh to Committee for assessment.

**Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Regeneration and Planning does not have delegated authority [clause 3(iv)].**

## 2 BACKGROUND

- 2.1 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 role 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.
- 2.2 The building is a purpose built church with extensive space for the congregation at ground floor and in the 1<sup>st</sup> floor gallery, below a tall vaulted ceiling. When

originally constructed the building was capable of holding a congregation of 850 members. However the CTMC now has only 38 confirmed members and the upper gallery is no longer safe to use. The existing worship space is therefore significantly larger than is required by the current congregation.

- 2.3 Previously the rooms located at lower ground floor level were used to accommodate four student bedspaces, although their use ceased in 2008.
- 2.4 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).
- 2.5 The application sets out an intention on the part of the applicant to address four key issues through a comprehensive refurbishment:
  1. A revised internal layout which addresses its current failure to provide an appropriate venue for the church's ministry aspirations;
  2. 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;
  3. The need to provide disabled access throughout; and
  4. The need to repair and make good the structural issues arising from the rear wall.
- 2.6 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.
- 2.7 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 TheWesley Hotel and operate a 4-star hotel on Euston Street, close to Euston Station. TheWesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference.
- 2.8 The proposal would include re-providing the existing church space at lower ground floor level, inserting a four storey structure suspended within the envelope of the building, and the erection of a roof extension, all to provide a 39 room hotel. The hotel use would provide the enabling finance for the works of repair and refurbishment of the building and its retention in worship and general community use. The scheme results in a net uplift in GEA floorspace of 576sqm.
- 2.9 A previous application for a similar scheme was refused on 02/06/2016 (2015/7007/P) as it was considered the roof extension was overly large and would be an incongruous addition; harmful to the host building and wider conservation

area. However, it was considered by the Council that the general principle of the scheme could be acceptable were the design issues able to be overcome.

### **3 SITE**

- 3.1 The application site covers an area of approximately 0.4 hectares (4000sqm). It is located on the south side of Plender Street on the east corner with King's Terrace – Camden High Street to the west, and Bayham Street to the East run parallel to the site. The site is in use as a church with disused student accommodation at basement level.
- 3.2 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.
- 3.3 The church itself is a prominent corner building; It was 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.
- 3.4 The character of the local area is very much of Camden Town, with a mix of Victorian terraces, mixed uses, mews streets and an interesting mix of architectural styles. 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 bric-a-brac items and second-hand clothing.
- 3.5 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.
- 3.6 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.
- 3.7 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 existing parking provided on site and the site has a Public Transport Accessibility Level (PTAL) of 6b (the highest accessibility level). It is approximately 0.1 miles north of Mornington Crescent tube station and 0.3 miles south of Camden Town tube station, which both have access to the Northern Line and good connections to central London and wider national rail services. Camden Road station is approx. 0.6miles north and provides access to London Overground services.

- 3.8 The lower ground floor was last used as student accommodation, comprising of four studios. The area was deemed to be unsuitable for habitation in 2008 and has not been used as student accommodation since. Many of the rooms now lie empty or serve as storage areas for the Church.
- 3.9 The main worship space is located on the upper ground floor. It is surrounded by a balcony/gallery which is considered unsafe. The congregation is 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 the 38 members and Adherents. It also provides two Christian congregations, a Brazilian Church and a Korean Church with a place of worship.
- 3.10 Moreover, the building is no longer considered to be structurally sound. The rear wall has been supported by shoring. This was initially proposed to be a temporary measure but has now been in place for over ten years as the Church has been unable to fund long term repairs. The 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.

#### **4 THE PROPOSAL**

- 4.1 The planning application proposes to bring the building back into accessible and practical use while maintaining a facility for worship on the site. In order to achieve this the applicant has entered into a development agreement with TheWesley so that the development comprises uses which complement the activities of both parties.
- 4.2 The lower ground floor would be refurbished as a flexible multi-purpose space for worship and community use. A 39-room boutique hotel would be inserted into the upper volume of the building, within a new reinforced concrete frame that would stabilise the building and support the additional floorspace. The roof extension would provide 9 of the rooms and is necessary to support operational viability of the hotel and hence the overall development.
- 4.3 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 an unviable/unmanageable space.
- 4.4 The lower ground floor 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.
- 4.5 The proposals significantly improve the accessibility from Plender Street. The existing access is via external steps upwards and then downwards within the building. There is no lift or level access facility. The proposals will introduce level access from the front door on Plender Street which will be shared by the Church and Hotel. Additional entrances are provided along King's Terrace. A reconfigured entrance on the corner of King's Terrace and Plender Street will provide direct access for 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 RELEVANT HISTORY

### *The site*

- 5.1 **2015/7007/P:** Planning application **refused** 02/06/2016 for 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. Refused on grounds of bulk, scale, massing and detailed design resulting in an incongruous rooftop addition to the detriment of the host building and wider conservation area.
- 5.2 **2010/4319/P:** 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.’*

This application received committee resolution to grant planning permission subject to s106, but the s106 was not completed and the case was withdrawn.

- 5.3 **PEX0200822:** Permission **refused** 15/11/2002 for “Erection of replacement 2.2m high railing and gates on front boundary.” Refused due to their increased height and prominence being detrimental to the appearance of the host building and wider conservation area.
- 5.4 **29884:** Approval **granted** 18/04/1980 for “Change of use of the basement from church hall to a student hostel.”

### *The area*

- 5.5 **23-27 Kings Terrace 2005/1993/P:** Permission granted in October 2005 for “The erection of an additional floor for 2 x 1 bedroom self-contained residential flats”
- 5.6 **11-19 & 23-31 Bayham Street and 8-24 Kings Terrace (9300539):** 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”

## 6 CONSULTATION SUMMARY

### *Local groups/stakeholders*

- 6.1 Camden Town CAAC: No comments received

## *Adjoining Occupiers*

6.2 2x site notice was displayed on Plender Street and Bayham Street from the 2/12/2016 until the 23/12/2016. A press advert was placed 08/12/2016 in the Ham and High.

6.3 Representations summary: No Comments Received.

## **7 POLICIES & Guidance**

### **7.1 National Planning Policy Framework 2018**

### **7.2 National Planning Practice Guidance (NPPG)**

The government has issued draft guidance to accompany the new NPPF. It is a material consideration but of limited weight at this stage.

### **7.3 The London Plan 2016**

The Mayor published a draft of the new London Plan for consultation in November 2017. It is a material consideration but of limited weight at this stage.

### **7.4 Mayor's Supplementary Planning Guidance**

### **7.5 Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- A1 Managing the impact of development
- A3 Biodiversity
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC2 Camden's centres and other shopping areas
- TC4 Town centre uses
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

### **7.6 Supplementary Planning Policies**



**Camden Planning Guidance**

CPG 1 Design (2015, updated March 2018)

CPG 2 Housing (2016, updated March 2018)

CPG Housing (interim)

CPG 3 Sustainability (2015, updated March 2018)

CPG 6 Amenity (2011, updated March 2018)

CPG Amenity

CPG 7 Transport (2011)

CPG 8 Planning obligations (2015, updated March 2018)

CPG Biodiversity (2018)

CPG Employment sites and business premises (2018)

CPG Town Centres (2018)

## 7. Assessment

7.1. The principal considerations material to the determination of this application are considered in the following sections of this report:

- **Land use**
- **Design and conservation**
- **Amenity**
- **Transport**
- **Energy and sustainability**
- **Protected species**
- **Public open space**
- **Employment and training opportunities**
- **CIL**
- **Summary**

## 8. Land Use

8.1 The development involves the following land use proposals, which are assessed in order below:

- a) Loss of student accommodation
- b) Adaption of community facilities
- c) Introduction of hotel use
- d) Overall mix of uses

### *A. Loss of student accommodation*

8.1. Policy H9 sets out that the Council will resist development that involves the net loss of student housing unless it has been demonstrated that :

- the existing accommodation is incapable of meeting contemporary standards/expectations for student housing or
- adequate replacement accommodation will be provided or
- it can be demonstrated that the accommodation is no longer needed

8.2. There were four rooms at lower ground floor level that were previously in use as student units. The committee report for 2010/4319/P noted that “the four rooms had a maximum capacity of 4 people, shared a common basement lounge, kitchen and washing facilities and were inhabited from September to June each year.” 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. A site visit indicated these are of poor quality with lack of outlook, sunlight/daylight and other general amenities. Due to health and safety reasons, the use ceased in 2008.

8.3. 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. Previous assessments (2010/4319/P and 2015/7007/P) accepted that the loss of the student accommodation on site was justified in accordance with policy. There has been no significant material change in the policy in the interim. Given that the existing student accommodation is unfit for use, has been vacant for 10 years and significant new accommodation meeting students' needs is coming forward elsewhere within the Borough it is considered the minor loss of four student bedspaces is justified in terms of policy H9.

- 8.4. Where the loss of student housing is justified, policy H9 identifies that "*alternative development should provide an equivalent floorspace in another permanent housing use in accordance with 'Policy H3'*". This is discussed further in the land use assessment from para 8.11 below.

#### B. Adaption of community facilities

- 8.5. Policy C2 sets out that the Council will '*work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services*'. The existing premises are predominantly comprised of a single large volume congregation space with the vaulted ceiling providing a 10m tall internal height. The raised ground floor worship space is ringed by a seating gallery which provides the Church with a total capacity for attendance by 850 people and dates from an era of much larger congregations than the Church now experiences. The main hall is accessible only via a series of internal and external steps, the basement level provides a very poor level of amenity for any active use and the layout throughout provides little opportunity for flexibility. The existing premises are therefore relatively inaccessible and inflexible in terms of providing a contemporary community facility.
- 8.6. 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 more modest needs of the existing congregation. Due to the reduced floor area and change in internal arrangements the congregation capacity is likely to be for approximately 80 people.
- 8.7. As part of the re-assessment of this case, the applicant has agreed to provide the flexible lower ground floor space and the church area for use by the community at a community rate, by arrangement and outside of church service or other specific time periods when required for their principal uses. This would need to be co-ordinated with the operators of the hotel and church facilities. There is a demand for affordable space for community groups in Camden and hence the provision of alternative facilities such as is proposed by the Methodist Church and at no cost to the Council, is welcomed. The availability of the community space would be secured by an additional s106 head of term and would ensure that the development provides an operational public benefit.

- 8.8. Policy C2 seeks to protect existing community facilities unless a replacement facility is provided or the local need for such facilities is no longer evident. The proposals would adapt the existing facilities to better suit the ongoing needs of the congregation and to provide inclusive community facilities for wider use. The proposed community uses are acceptable in terms of policy C2.

#### *C. Introduction of hotel use*

- 8.9. Policy E3 sets out that the Council will support small scale visitor accommodation in town centres including Camden Town. The hotel would provide 39 rooms, 4 of which would be wheelchair accessible. 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. The rooms will all be finished in a simple palette to reflect the values and philosophies of CTMC.
- 8.10. 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. The site is therefore considered to be appropriately located for the proposed hotel use and the principle of a hotel on the site is acceptable in terms of policy E3.

#### *D. Overall mix of uses*

- 8.11. Under policy H2 (maximising the supply of self-contained housing) the uplift of more than 200sqm of floorspace in Camden Town Centre triggers a requirement for 50% of the additional floorspace to be self-contained housing. The Table below summarises the policy expectations.

Existing Floorspace	961sqm
Proposed Floorspace	1537sqm
Uplift floor space	576sqm
Target for on-site housing	576 x 50% = 288sqm

- 8.12. Policy H2 requires a staged assessment to determine :
1. Whether self-contained housing is required as part of a mix of uses, and if so
  2. Where the housing should be located (on site, off-site).
- 8.13. The first stage of the assessment requires consideration of policy H2 criteria (a - e). These set out the key considerations for assessing whether the development should include housing as part of the mix of uses. The relevant parts are assessed below.

#### *Policy H2 criteria (a-b): site/area character & constraints*

- 8.14. Parts (a) and (b) examine the character of the development, the site and the area and any constraints on developing the site for a mix of uses. The building is identified in the Camden Town Conservation Area Appraisal and Management Strategy (CAAMS) as making a positive contribution to the area. Under section

72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”), special attention must be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The effect of S.72 provides the statutory basis for a presumption in favour of preserving or enhancing the character and appearance of Conservation Areas and considerable importance and weight should be attached to this presumption. The loss of the existing building would cause harm to the character and appearance of the conservation area and therefore there is a strong presumption for the retention of the existing building, although it is acknowledged that this would constrain the options for development.

- 8.15. The majority of the building envelope is taken up by the vaulted triple-height congregation space and therefore any new floorspace will need to be inserted within the retained walls of the building. There is also limited scope for additional height above the existing roof level. The building is in a very poor state of structural repair. The applicant’s estimates of £2M for works required to retain and refurbish the existing structure have been confirmed by the Council’s viability consultants as reasonable. This cost places a significant burden on the viability of any development proposals on the site.
- 8.16. The development of a small hotel and retained community space which can serve a dual purpose as both congregational church space and general purpose meeting/ event space are mutually compatible and complementary uses. Each use requires servicing, back-of-house and circulation space. The addition of self-contained housing as a third use on site would require further independent requirements for ancillary space such as waste storage, cycle parking and access. The footprint of the building covers almost the entirety of the site and there is limited prospect of locating further ancillary uses outside the existing building.
- 8.17. There are operational merits in the co-location of the hotel and church/ community uses. Access to the lower ground floor community space is provided via a ground floor lobby and front-of-house space which is shared with the hotel. This is an efficient way of overseeing and managing the comings and goings of users of the community space and meeting facilities. The lower ground floor facilities would provide breakfast facilities for hotel guests and would be available for church and community use during the remainder of the day.

*Policy H2 criterion c: development in Hatton Garden*

- 8.18. Not relevant.

*Policy H2 criterion d: compatibility of uses*

- 8.19. Part d requires an assessment of whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses. The provision of self-contained housing within the building could give rise to concerns about the compatibility of uses, due to the transitory nature of the users of the hotel and community space and

the potential for noise and nuisance to have an impact the amenity of residents in the building. However this is a town centre site with existing residential uses in close proximity and therefore careful management of the non-residential uses on site will be required in any event in order to avoid harmful impact on nearby homes. Therefore it is considered that there is no inherent incompatibility between the proposed uses and housing, which could not be managed through suitable planning conditions or obligations.

*Policy H2 criterion e: funding arrangements and public purpose*

- 8.20. Policy H2 (e ) requires consideration of whether the development is publicly funded or serves a public purpose. The CTMC is not a registered charity due to its income falling below £100,000 however it is ‘an exempted charity under Statutory Instrument 2014 No. 242’. The proposed operator, TheWesley 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. The development would not be publically funded however it would re-provide worship space for the existing congregation. It would also provide flexible community facilities for use by the wider community, which would be secured by s106 head of term and therefore it is considered that the development would support a public purpose.

*Policy H2: Part 1 conclusion*

- 8.21. It is evident that the planning preference for retaining the existing building places considerable constraints on the development opportunities for the site. While the location of the site and the proposed uses do not present any clear incompatibility with the addition of housing, the introduction of a third use would place further pressures on the limited space within the building. The impact of these constraints will be considered further in the second part of the assessment against policy H2. For the purposes of the first stage of the policy H2 assessment, it is concluded that housing *should* be required as part of the development proposals.

*Policy H2 : Part 2 assessment (location of required housing)*

- 8.22. In determining whether housing should be provided on site and the most appropriate mix of housing and other uses, policy H2 identifies that the outcomes of criteria (a-e) will be taken into account, alongside further additional criteria as follows:

*Policy H2 criterion f: community safety (active street frontage and natural surveillance)*

- 8.23. The proposed hotel use would introduce active surveillance at the street level entrance where it does not currently exist. The building lends itself to locating non-residential uses at the lower levels and therefore it is considered that the proposed mix of uses would not compromise the potential of the site to support natural surveillance and an active street frontage.

*Policy H2 criterion g: additional floorspace needed for an existing user;*

8.24. The proposals would rationalise and modernise the space required by the CTMC, which frees up space for other uses.

*Policy H2 criteria h-i: impact on efficiency and overall quantum of development; viability & economics;*

8.25. The applicant has advised that the operation and viability of the hotel element is dependent on securing a minimum of 39 rooms.

8.26. The Council's independent viability consultants BPS reviewed the submitted "Feasibility and Viability Report" in 2016 and concluded that the scheme yielded a deficit of -£3.3M to -£4M. This deficit was largely due to the high costs of refurbishing and converting the existing building to a reasonable standard. BPS re-appraised the viability in July 2018 and conclude that £5.4m-£6.1m is the current range of capital values for the site and on that basis the deficit range would remain -£3.3m to -£4.0m, which they comment is a '*substantial deficit*'.

8.27. In order to further test the potential of the proposed development to support housing within the mix of uses, officers and BPS have assessed the potential impact of introducing a single floor of self-contained housing to the scheme's financial viability. As part of retaining the building, the insertion of new uses within the existing envelope mean that the quality of amenity on floors 1-3 would not be optimal. Therefore officers consider that the roof extension is the most appropriate location for permanent housing which achieves a good quality of amenity. The top floor could notionally support three 2xbed flats. This would require:

- the loss of the top floor of 9 hotel rooms and 2 further rooms at each of the lower floors to facilitate a residential stair core
- independent access from the street
- ancillary waste and cycle storage at street level

8.28. BPS carried out an indicative assessment of the impact of a single floor of housing on the viability of the scheme (see Appendix B). On the basis of typical cost estimates and comparable sales figures for three 2-bed flats BPS advise that the development costs would increase but the housing would also generate an improved capital value. BPs conclude that "*it appears that the alternative scheme (hotel, with residential on the top floor) generates a broadly similar residual land value to the proposed scheme*", albeit neither approach to the scheme would provide positive viability.

*Policy H2 criterion j : alternatives to better meet policy objectives*

8.29. The final consideration of the second part of the H2 assessment is whether there are alternatives which would better meet the needs of policy H2 or the strategic aims of the Local Plan. This is considered in the concluding assessment below in paras 8.36- 8.42.

*Policy H2 : Viability & Payment in lieu*

- 8.30. Policy H2 sets out that where “financial viability constraints prevent a development *from meeting the 50% housing target and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution*”. A payment in lieu for the shortfall of housing in this instance has been calculated as £201,600.
- 8.31. In July 2018 BPS revisited the viability assumptions from January 2017 and consider that they remain valid. They updated the expected costs for refurbishment and alteration which were previously agreed as very high but a fair reflection of the poor condition of the existing space. They also increased the expected yield from the hotel to reflect the current market. BPS find that based on these adjustments there would be a £1m potential increase in capital values (from the 2017 assessment). However, when taken in combination with the £0.64m increase to construction costs (plus additional finance costs and professional fees on top of this) this increase in value is insufficient to overcome the substantial deficit range of £3.3m-£4.0m. The scheme remains unviable.

*Policy H2 part 2 and overall conclusions: Location of housing & mix of uses*

- 8.32. As set out above, there is a strong presumption for retention of the existing building which makes a positive contribution to the character and appearance of the Camden Town Conservation Area. Any alternative development would therefore be constrained by many of the same considerations as the existing proposals, including the compromised quality of daylight and outlook on the lower floors. The presence of a worship space within a wider mix of uses which include community space would be an appropriate reminder of the original purpose of the building.
- 8.33. The site is in an appropriate location for providing permanent housing. However there are three key factors which militate against including housing in the final mix:
- a. The reduction in hotel room count (from 39 to 26) to facilitate housing alongside the other uses would make the hotel unviable;
  - b. The constraints imposed by retaining the existing building. These include:
    - a. the inflated cost of refurbishment (relative to the cost of demolition and rebuild)
    - b. poor standard of residential amenity (outlook, daylight) in the lower floors;
    - c. the near full site footprint requires all ancillary space (waste, cycle stores, access points and circulation) to be located within the existing building envelope.
    - d. accommodating the independent needs of community, hotel and residential uses would result in a very inefficient and generally impractical internal layout
  - c. The Methodist Church wishes to maintain a worship facility on site, and has advised that they “*are very supportive of providing housing within the borough, and have taken very seriously the potential of including an element of housing within the proposed re-use of the building*”. However their previous attempts to broker a residential/church/community mix met with failure due to lease and management arrangement issues between the church and development



partner. The current submission advises that the lack of members 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, either now or in the future. The current partnership arrangement appears to be the best opportunity for ensuring the future of both the existing building and the church's presence on site.

8.34. The building is acknowledged in the Conservation Area Statement as a notable and important local building. It is currently in a very poor state of repair and needs significant remediation work to arrest further decline. There is a very real prospect that the building may become so unsound in future that it may become unviable to restore and will have to be demolished. The owner is proposing a scheme which would retain and restore the main structure in its entirety with a roof addition. The viability of the scheme is depressed by the high costs involved in retaining the building, compared to the alternative of demolition and rebuild. Officers have negotiated a new head of term to secure public benefits in the form of community-priced access to the community space.

8.35. Officers are strongly supportive of proposals which have a prospect of delivery in order to refurbish and restore the building and return it to a sustainable and optimal use. Taking account of

- the site constraints and significant practical issues of delivering a policy compliant housing component as part of the uplift in floorspace
- the benefits of retaining the building and
- the community benefits of access to affordably priced facilities

officers maintain the previous conclusion (presented to and accepted by committee in 2017) that there are exceptional circumstances in this instance which justify the non-provision of on-site housing. The final policy H2 requirement of considering an in-lieu payment is addressed below.

#### *Policy H2 operator & payment in lieu : conclusions*

8.36. It is evident from the applicant's correspondence that the development is motivated by their desire to maintain a worship and community use on the site and to deliver this alongside a hotel which is operated on a socially responsible and ethical ethos. This is an inherent element in the outcomes of the viability assessment. They advise that the hotel:

*"is to be run by The Wesley that has a nearby Hotel in Euston and would be operated in accordance with the same ethical ethos as their current hotel. The Wesley is committed to sustainable business and social responsibility. The Wesley have a policy of local procurement of all consumables and the promoting of local employment. For The Wesley it is important that they have a strong presence to make a real difference with their ethical model at this address. They have based this on the use of the building for this primary hotel function with the compatible use of the lower ground floor for worship and community use, to continue the*

*Methodist ministry in the building. The implementation of housing although desirable locally would not fit with this use of the building or the ethos of The Wesley”.*

- 8.37. BPS have noted (Appendix B para 1.8) that *“the nature of The Wesley operating as a social enterprise significantly impacts the viability of the proposed development and thus the ability of the scheme to support residential either on-site or by way of a payment in lieu”.*
- 8.38. A deferred payment mechanism will be secured by legal agreement to ensure that should the viability of the scheme change a contribution will be made. Officers previously concluded that there are exceptional circumstances in this instance which justify the non-provision of a payment in-lieu of housing within the development. However the minutes from the planning committee in 2017 recorded Members’ concerns that the choice of hotel provider was an elemental factor in the failure of the development to support housing in any form. They concluded that in the circumstances of the relaxations being applied to the mixed use policy, a wider safeguard was necessary to secure the benefits of the planning permission and this meant that the planning permission should be personal to the Camden Methodist Church, secured by way of a head of term in the s106 legal agreement.
- 8.39. However in the meantime the applicant has advised that this clause means *“that it would not be prudent for the Methodist Council to progress with the project and incur substantial expenditure since the finished property would effectively have a nil resale value”.*
- 8.40. Any planning obligation must, as a matter of law, serve a planning purpose. So long as the obligation secures that planning purpose then the mechanism for securing it is not material. Officers have therefore explored alternative mechanisms to ensure that changes to the development partner (ie The Wesley Hotel) would trigger the need for a deferred viability contribution. The chosen mechanism ensures that any change in ownership (‘legal interests’) in the property within 15 years from the date of the permission would trigger the need to pay the deferred viability contribution (capped at £201,600, index linked) to the Council. Such a change in ownership would need to be a transfer to any party which is not a charitable body wholly under the control of the Methodist Conference.
- 8.41. The new mechanism would ensure that if a change in ownership occurs and the viability of the scheme had already been re-assessed, the balance on any shortfall in payment up to the cap would be paid. If no such re-appraisal had already taken place then the financial contribution would be made *in full* Officers consider that this mechanism, secured though the s106 legal agreement, *“Enhanced Deferred affordable housing payment capped at £201,600”*, would be sufficient to ensure that the involvement of a commercial hotel operator in the site, for instance, would ensure that the council receives the full amount of the financial contribution to permanent housing.

- 8.42. Officers consider that this mechanism achieves the planning purpose of the additional Head of Term which Members added to their resolution in 2017, but also allows the owners to proceed with the development.

## **9. Design and Conservation**

- 9.1. 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.
- 9.2. 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
- 9.3. 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
- 9.4. Paragraph 190 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.
- 9.5. 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.

- 9.6. Paragraph 196 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.” Policy D2 outlines that only permit development within conservation areas that preserves and enhances the character and appearance of the area. 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*

- 9.7. The existing roof form is an original tiled pitch typical of a 19th century church. The proposal would see a single-storey mansard type extension erected. This was subject to numerous refinements following on-going discussions with the Council.
- 9.8. The proposed extension would be approx. 1.5m higher than the existing roof at ridge height. The extension is set behind the existing parapet, which would be slightly raised at the side elevations, and designed so that it slopes down at the front, rear, and sides of the building reducing its visual impact significantly in long views. The extension would be clad in a pre-weathered corten-steel mesh and bronze/copper coloured single ply membrane, chosen to complement the tone of the existing brickwork. Openings to the east and west will be provided to allow views out and animating the side elevations, they would align with existing windows below and be subservient in appearance.
- 9.9. The proposed roof extension is considered to be a high quality and well-proportioned addition to the building. It would be subservient in height, bulk and massing and would not over-dominate the main historic building. Whilst it would read as a contemporary addition it is considered to be of sufficient design and material quality to be an appropriate addition.
- 9.10. The materials are of a weathered corten-steel/brown palette, which is considered to be complementary to the host building and the wider conservation area, being reflective of the surrounding materials.
- 9.11. The mansard slopes down at an angle of 60-70 degrees towards the existing front and rear gables, reducing its impact when viewed from the street and in long views. Whilst the windows in the side elevation align with lower windows and are subservient in appearance in accordance with CPG.
- 9.12. The proposed roof extension would be a high quality contemporary addition which preserves and enhances the appearance of the conservation area and is acceptable in terms of policies D1 and D2.

#### *Building Entrances*

- 9.13. 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

C6 (Access for all ) 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.

- 9.14. 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.
- 9.15. 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 and overall the design of the entrances meets the expectations of policy C6.

#### *Rear Wall*

- 9.16. The rear wall is currently in a poor state of repair and is being held up by substantial supports. It would be demolished and rebuilt.
- 9.17. The submitted heritage statement identifies the rear wall as being unremarkable and plain; it does not contain any important or unique historic features and is designed very much as a flank wall for other buildings to abut. Its replacement with matching brickwork and design to ensure structural integrity is therefore considered acceptable.

#### *Internal arrangement*

- 9.18. 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.
- 9.19. During previous iterations of the scheme there was some concern that the internal floors would not align with windows, and this would be visible, particularly at night. The proposal now sees floors and internal windows better aligned with the existing window layout and is acceptable.
- 9.20. The existing main hall which is an attractive late Victorian church hall, comprising timber panelling, balustrades and seating, would be removed. This is unfortunate, however the building is not listed and there is no formal protection for building interiors.
- 9.21. The applicants have confirmed that they will reuse panelling, balustrades and other timber within the building where possible, particularly in the new church spaces. This is welcomed by the Council and will help to somewhat preserve the historic feel of the building internally.

## **10. Amenity**

### *Daylight and sunlight*

- 10.1. 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*

- 10.2. 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.
- 10.3. 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*

- 10.4. 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.
- 10.5. Any taxi drop offs/collection will occur in the lay-by outside the Church on the Plender Street elevation.
- 10.6. 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.
- 10.7. A legal agreement to for securing a Travel Plan will be agreed, with the main aim of promoting sustainable forms of transport. This will act in accordance with Local Plan policy A1.

### *Noise*

- 10.8. 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.

## **11. Transport**

- 11.1. The site has a Public Transport Accessibility Level (PTAL) of 6b (the highest accessibility level). It is approximately 0.1 miles north of Mornington Crescent tube station and 0.3 miles south of Camden Town tube station, which both have access to the Northern Line and good connections to central London and wider national rail services.

#### *Car and cycle parking*

- 11.2. 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. This would be secured by a s106 legal agreement. In accordance with the Further Alterations to the London Plan Cycle standards which requires for Hotels: 1 short stay space per 20rooms and 1 long stay space per 50rooms; and for churches 1 short stay space per 8 staff and 1 long stay space per 100sqm, the proposals will therefore provide a total of 6 cycle parking spaces for the church and hotel uses.
- 11.3. 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.
- 11.4. Any taxi drop offs/collection will occur in the lay-by outside the Church on the Plender Street elevation.
- 11.5. 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.
- 11.6. A legal agreement to for securing a Travel Plan and Operations/Hotel management plan will be secured by s106 agreement, with the main aim of promoting sustainable forms of transport, in accordance with policies A1 and T2..

#### *Construction management*

- 11.7. 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 secured by s106 legal agreement.
- 11.8. As such, the development is in accordance with policies A1, T1 and T2.

#### *Waste, refuse and servicing*

- 11.9. 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.

- 11.10. 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.
- 11.11. 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.
- 11.12. Deliveries will comply with strict procedure as set out in the draft Operational Management Statement (to be secured by legal agreement). It is expected that the site will receive a maximum of five deliveries per day on weekdays and between two and three on Saturdays. Weekday deliveries will normally be between 08.00 and 16.00 and between 08.00 to 12.00 on Saturdays to ensure minimum disturbance to surrounding occupiers. A full Operational Management Plan will be secured by way of s106 legal agreement. This is considered be an acceptable approach and any necessary changes deemed necessary can be incorporated into the Operational/Hotel Management Plan prior to sign off.

#### *Highway repair*

- 11.13. A financial contribution will be required to reinstate the footway surrounding the site to repair damage caused by construction in line with policies T1 and DM1 which will be secured as part of the section 106 legal agreement.

## **12. Energy and sustainability**

- 12.1. In accordance with Policy CC1 (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 achieving set targets in reducing water and energy usage at a 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. Policy CC2 sets out that development within Camden will be required to demonstrate compliance with BRE AAM Excellent, with a minimum of 60% of credits targeted in the energy category, 60% in the water category, and 40% in the materials category.
- 12.2. 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.
- 12.3. The development achieves the following in the hierarchy
- 'Be lean' – a 39% decrease in CO2 emissions over Part L of the 2013 Baseline.



- 'Be clean' - given the nature of the site CHP is not appropriate and there is no potential to connect to a decentralised energy network (DEN), therefore no savings.
- 'Be green' – a 4% decrease in CO2 emissions over Part L of the 2013 Baseline

- 12.4. The scheme is therefore considered to be capable of being acceptable with regard to sustainability, achieving 43% decrease in CO2 emissions over Part L of the 2013 Baseline. Nonetheless, a sustainability plan would need to be secured by way of s106 legal agreement to ensure that the development still complies post construction.
- 12.5. 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. It is considered that renewables such as solar panels on the roof would be unacceptable given their impact on the design of the building. The site itself, being a historic building on a small site does not lend itself to a CHP system and there are currently no DENs in the area, although space will be left to future proof the scheme should any be implemented. This is considered to be sufficient justification.

### **13. Protected Species**

- 13.1. Given the age, structure and condition of the building it is considered necessary for an assessment of the potential for presence of protected species (bats) to inform any mitigation that might be required, in accordance with CPG3.
- 13.2. A preliminary Bat Roost Assessment has therefore been provided. The assessors carried out a desk study, external inspection and an internal inspection, as is standard.
- 13.3. The desk study identified nine roosts within the search area however neither the external or internal inspections found any evidence of bats or roosts – such as live or dead bats, droppings, urine splashes, fur-oil staining and/or squeaking noises.
- 13.4. The assessors conclude that the likelihood of any bat roosts is considered negligible in context of the following factors, 1) the site location within a highly developed area of central London; 2) the architectural design and building materials used; and 3) the poor surrounding green infrastructure which limits connectivity (i.e potential flight paths) to more suitable areas such as Regent's Park in the wider area.
- 13.5. Based on this assessment and conclusion it is not considered that redevelopment of the site would be harmful to any protected species. The submitted report has been reviewed by the Council's nature conservation officer and no issues have been raised.

### **14. Public Open Space**

- 14.1. Policy A2 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 Camden Guidance on Public Open Space would be sought. It is likely this would be spent on relevant public realm improvements in the area. 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. A contribution of £49062 would be required and this would be secured by a s106 legal agreement.

## 15. Employment and training opportunities

- 15.1. Policy E1 and Camden Planning Guidance state that in developments of this nature the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.
- 15.2. In line with Camden guidance, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 / condition and will comprise:
- The applicant should work to **CITB benchmarks for local employment** when recruiting for construction-related jobs.
  - The applicant should advertise all construction vacancies and work placement opportunities **exclusively with the King's Cross Construction Skills Centre** for a period of 1 week before marketing more widely.
  - The applicant should provide a specified number (to be agreed) of **construction or non-construction work placement opportunities** of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
  - If the build costs of the scheme exceed £3 million the applicant must recruit 1 **construction or non-construction apprentice** per £3million of build costs and pay the council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
  - As the end operator of the hotel is known, the Section 106 agreement should also provide for a specified number (to be agreed) of **apprentice or trainee places at the hotel**. The end user should recruit these positions through the Council's Economic Development team.

- If the value of the scheme exceeds £1 million, the applicant must sign up to the **Camden Local Procurement Code**..
- The applicant provide a **local employment, skills and local supply plan** setting out their plan for delivering the above requirements in advance of commencing on site.

15.3. The proposals are therefore in accordance with the guidance set out in Camden planning guidance and policy E1.

## 16. CIL

16.1. The proposal will be liable for both the Mayoral and the Camden CIL as the proposal is for uplift of more than 100sqm. The likely charge would be based on an uplift of 576sqm equating to £28,000 (Mayor of London @ £50 p/sqm) and £17,280 (Camden @ £30 p/sqm).

## 17. Conclusion

17.1. The proposals seek to retain a dedicated worship space and flexible community space on the site. The proposals introduce a new 39-bed hotel into the building in order to provide the funds for the extensive structural repair and refurbishment works.

17.2. The building's 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. 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.

17.3. 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 and the partnership with the Methodist International Centre (MIC) who trade as TheWesley Hotel social enterprise hotel is the owners preferred approach to achieving their aspirations.

17.4. 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 which will provide public benefit through making community space available at a community rate for a period of each week.

- 17.5. The proposed development will provide a long term worship space as well as a reliable income stream for the CTMC. (The Wesley 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.
- 17.6. The following further material considerations have taken place since the planning committee resolved to grant planning permission in 2017:
- Local Plan has been adopted
  - Applicant agreed to additional s106 legal agreement head of term to provide community facilities at community rates
  - Alternative mechanism found to replace 'personal permission'
  - Viability of scheme re-appraised with 2018 figures and additional indicative assessment of viability carried out on mixed hotel/housing development
- 17.7. Officers consider that the development would bring public benefits through the provision of the community space for general use and the enhancement to the character and appearance of the conservation area through saving and refurbishing the building. Furthermore officers consider that there are exceptional circumstances in this instance which justify the non-provision of on-site housing, although a deferred housing payment would be secured by legal agreement in the event that the ownership of the site changes within 15 years of the date of planning permission.

## **18. RECOMMENDATIONS**

### **18.1. Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-**

- Hotel Management Plan
- Construction Management Plan (CMP)
- CMP Monitoring Contribution - £7,620
- Travel Plan
- Sustainability Plan
- Energy Efficiency Plan
- Highways and Streetworks Contribution of £15,942
- Open Space Contribution - £49,062
- Local Employment and Training Plan
- Local Employment and Training Contributions
- Local Procurement
- Enhanced Deferred affordable housing payment capped at £201,600 to be triggered upon change in ownership
- Community facilities plan (to make the multi-purpose room and worship area available for community use outside of specified time periods where required for

their principal purpose at a rate commensurate with other charitable and publicly subsidised facilities in Camden)

## 19. Conditions

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the following approved plans: (859\_03/03/)0219 P8; 0220 P8; 0221 P6; 0222 P6; 0223 P6; 0224 P6; 0225 P6; 0510 P6; 0511 P6; 0512 P6; 0513 P6; 0514 P6; 0255 P8; 0600 P6; 0601 P6; 0602 P6; 0603 P6; 0800 P2; 0801 P2; 0802 P2; 0803 P2; (859\_03/01/)0100 P1; 0219 P1; 0220 P1; 0221 P1; 0500 P1; 0501 P1; 0600 P1; 0601 P1; 0602 P1; 0603 P1; Deliverability and Viability Statement (November 2016); Planning Statement (November 2016); BREEAM Pre-Assessment (December 2015); Operational Management Statement (16th November 2016); Plant Noise Assessment (17th November 2015); Heritage Statement (November 2016); Preliminary Risk Assessment (November 2016); Daylight and Sunlight Study (3rd November 2015); Covering Letting (25th November 2016); Design and Access Statement (November 2016); Construction Management Plan.
3. Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:
  - a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills, external doors and gates;
  - b) Manufacturer's specification details and samples of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the surrounding conservation area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan.

4. No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the surrounding conservation area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan.

5. Before the development commences, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5 of the Camden Local Plan.

6. Before the development commences, details of secure and covered cycle storage area for 6 cycles shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T3 of the Camden Local Plan., the London Plan and CPG7 (Transport).

7. Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To ensure that the amenity of occupiers of the development site / surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policies A1 and A4 of the Camden Local Plan 2017.

8. No customers shall be picked up or dropped off by coach at any time.

Reason: To safeguard the highway conditions and safety of the wider area and to safeguard the amenities of the neighbouring residential premises and the area generally in accordance with the requirements of policies A1, T1 and T2 of the Camden Local Plan 2017.

9. Non-road mobile machinery

All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements policies A1 and CC4 of the Camden Local Plan.

## **Informatives**

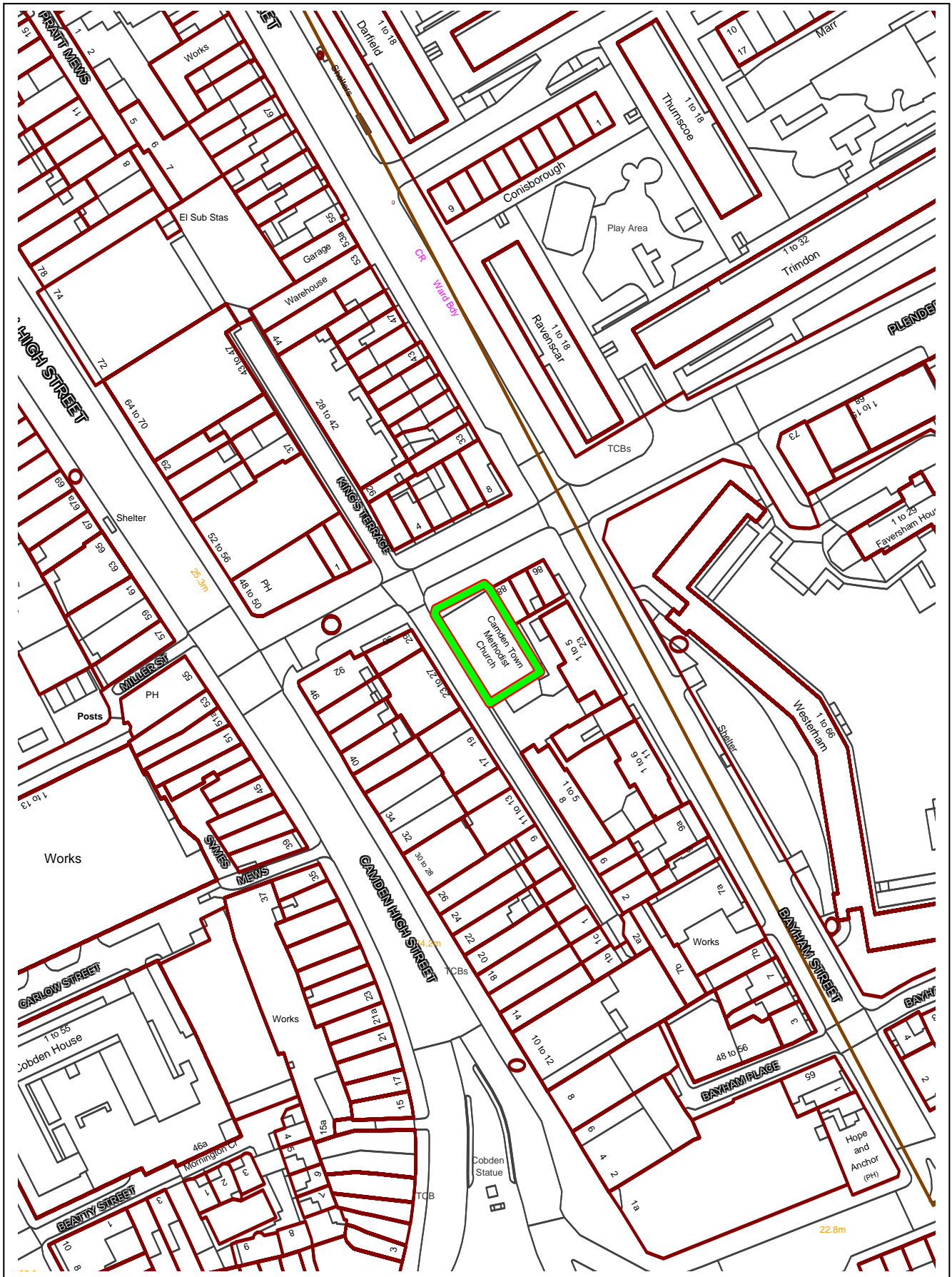
1. Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
2. You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 020 7974 6914/5 or see the website <http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en>.
3. You are advised of the need to ensure that all necessary consents have been obtained from Thames Water regarding the connection of the development to the public sewer. You should incorporate protection to your property from possible surcharge from the sewerage network during storm events, for example by installing a non-return valve to prevent backflow. Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Please contact Thames Water Developer Services on 0845 850 2777.
4. Thames Water have advised that the design of the development should take account of a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves the public water supply pipes.

5. Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
6. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
7. You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation. Based on the information given on the plans, the Mayor's CIL Charging Schedule and the Camden Charging Schedule, the charge is likely to be £28,000 (576sqm x £50) for the Mayor's CIL and £17,280(576sqm x £30 using the relevant rate for uplift in that type of floorspace ) for the Camden CIL.

This amount is an estimate based on the information submitted in your planning application. The liable amount may be revised on the receipt of the CIL Additional Information Requirement Form or other changes in circumstances. Both CIL's will be collected by Camden after the scheme has started and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement and/or for late payment. We will issue a formal liability notice once the liable party has been established. CIL payments will also be subject to indexation in line with the construction costs index.



## Appendix 1: Independent Assessment of Viability Report



Application No: 2016/6490/P

**Camden Methodist Church**  
**89 Plender Street**  
**London, NW1 0JN**

**Scale:**  
**1:1250**  
**Date:**  
**3-Aug-18**



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## **Appendix A**

**Relevant extracts from Planning Committee minutes 11<sup>TH</sup> MAY, 2017**

## **THE LONDON BOROUGH OF CAMDEN**

At a meeting of the **PLANNING COMMITTEE** held on **THURSDAY, 11<sup>TH</sup> MAY, 2017** at 7.00 pm in the Council Chamber, Town Hall, Judd Street, London WC1H 9JE

### **MEMBERS OF THE COMMITTEE PRESENT**

Councillors Heather Johnson (Chair), Roger Freeman (Vice-Chair), Danny Beales, Richard Cotton, Sally Gimson, Adam Harrison, Phil Jones, Richard Olszewski, Flick Rea, Sue Vincent and Abi Wood

### **MEMBERS OF THE COMMITTEE ABSENT**

Councillors Claire-Louise Leyland, Andrew Marshall, Lazzaro Pietragnoli, Phil Rosenberg and James Yarde

### **ALSO PRESENT**

Councillor Nasim Ali

**The minutes should be read in conjunction with the agenda for the meeting. They are subject to approval and signature at the next meeting of this Committee and any corrections approved at that meeting will be recorded in those minutes.**

### **MINUTES**

#### **1. APOLOGIES**

Apologies for absence were received from Councillors Claire-Louise Leyland, Andrew Marshall, Lazzaro Pietragnoli and Phil Rosenberg.

#### **6. PLANNING APPLICATIONS**

Consideration was given to the report of the Director of Regeneration and Planning.

....

#### **(8) CAMDEN METHODIST CHURCH, 89 PLENDER STREET, LONDON NW1 0JN**

Consideration was also given to the information contained in the supplementary agenda.

Members expressed concern about the lack of affordable housing provision or in lieu payment and queried whether decisions by the applicant, such as not introducing a commercial hotel provider and not having a scheme providing residential units, had ensured the viability of the scheme was such that no affordable housing element needed to be provided.

Andrew Jones, representing BPS the Council's independent viability advisor, stated that because of the high cost of refurbishing the existing building, the 39 room hotel needed to generate an estimated £3.3million just to break even. It was not considered that the use of a commercial hotel provider would bridge that deficit because the refurbishment costs would still be a factor. While BPS had not formally assessed a scheme providing residential units on site, any such scheme was still likely to lead to a deficit and would impact on the rationale for the church element of the building. Broadly it was a difficult scheme from a viability perspective no matter what approach was taken.

The Planning Officer commented that officers had explored the feasibility of providing a residential element in the scheme and found that aspects such as refuse space and a plant room would compromise the worship space and hotel on the ground floor and render the scheme impractical. Additionally, as the applicant wanted to retain ownership of the building, a residential scheme would conflict with this.

A Member stated that they were not convinced that a scheme providing residential units on site would not have been able to meet affordable housing requirements. It seemed that by not investing in the building for a number of years the applicant was now being rewarded by being able to avoid public contributions. It was further suggested that there was an allusion to some form of social benefit from the scheme, which made it more acceptable to waive the affordable housing requirements, but it was not clearly defined. Officers clarified that in any case the policy did not exempt charities from affordable housing requirements and the scheme had not been assessed on such basis.

The Conservation Officer confirmed that the angle of the mansard-type roof was within 60 – 70 degrees. Members asked that the angles be listed in reports in future.

**ACTION BY:           Head of Development Management**

The applicant agreed that they were happy for the planning permission to be made specific to the Camden Methodist Church through the Section 106 legal agreement.

On being put to the vote it was, with 7 votes in favour, 2 against and 2 abstentions:

#### **RESOLVED –**

THAT planning permission be granted subject to conditions and a Section 106 legal agreement as set out in the report, and an additional head of term to ensure planning permission was specific to the Camden Methodist Church.

**ACTION BY:           Director of Regeneration and Planning  
Borough Solicitor**

#### **7. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

There was none.

Having adjourned between 20:38 and 20:46 and again between 21:57 and 22:01, and having moved Committee Rule 19(a), the meeting ended at 10.29 pm.

**CHAIR**

**Contact Officer: Dan Rodwell**

**Telephone No: 020 7974 5678**

**E-Mail: [planningcommittee@camden.gov.uk](mailto:planningcommittee@camden.gov.uk)**

**MINUTES END**

**Appendix B: Viability audit report by BPS July 2018.**

# Camden Methodist Church

## Viability review

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Prepared on behalf of the London Borough of Camden

2nd July 2018

Planning reference: 2016/6490/P



82 South Street, Dorking, RH4 2HD  
[www.bps-surveyors.co.uk](http://www.bps-surveyors.co.uk)  
Tel: 01483 565 433



## 1.0 INTRODUCTION

- 1.1 We have been instructed by the London Borough of Camden to undertake a viability review in respect of the proposed redevelopment of Camden Methodist Church.
- 1.2 A November 2016 report was provided by the Wesley Group. We have already provided a review of this report, dated 25th January 2017, in respect of this scheme.
- 1.3 The existing site measures 0.04 hectares (0.099 acres) and comprises D1 and C2 space, although we understand the basement C2 space is no longer in use due to safety concerns. The local area surrounding the development site is made up of mostly retail and residential property.
- 1.4 We understand that the application is for hotel development above the existing Church building. However we have considered the valuation impact of including an element of residential development within this scheme. In consultation with the Council's Planning Officer it is considered that a notional conversion of the upper floor from hotel to residential use would represent the most planning suitable approach, from an amenity perspective and also in terms of maximising achievable values having regard to outlook, noise impact, *etc.*
- 1.5 This report deals with the following two matters:
- 1) We have firstly updated our January 2017 report to make allowances for any market changes since then.
  - 2) Secondly, we have considered the alternative scheme - with upper floor residential - to consider whether this has the potential to be viable. This scenario entails a loss of 2 hotel rooms per floor, to make way for the creation of a separate stairwell to provide access to the residential upper floor. We have been guided by the sketch drawings that have been provided by architects Manolo & White.
- 1.6 We are advised that the scheme will need to be referred back to the Planning Committee, given the long time that has elapsed since it was last placed before Committee.

*Policy DP1 requires 50% of additional floor space to be provided as residential accommodation for extensions over 200 sqm, resulting in this instance for a requirement to deliver 288 sqm of residential floorspace. The applicant considers that the proposed scheme cannot facilitate the provision of on-site residential accommodation without reducing the hotel below a sustainable critical scale of operation and also points to the difficulties on site provision would generate in terms of the need for separate entrance and service cores. The applicant does not have alternative sites in the local area. In consequence of the above a payment in lieu sum has been calculated at £201,600 (£700 x 288 sq.m).*

Update to January 2017 BPS report

- 1.7 The proposed scheme was shown, based on our suggested appraisal assumptions, to have a viability deficit of -3.3m-£4.0m. This is on the basis of a benchmark land value of nil with the hotel element let to The Wesley (Methodist International Centre), a social enterprise hotel operator. The conclusion was that the scheme cannot viably provide any contribution towards affordable housing.
- 1.8 This recognised that the nature of The Wesley operating as a social enterprise, significantly impacts the viability of the proposed development and thus the ability of the scheme to support residential either on-site or by way of a payment in lieu.

	January 2017	June 2018
<b>Hotel Capital values</b>	We agreed to £4.4-£5.1m as capital value for 39 rooms (£113,000 per room)	We have checked on hotel market trends and have identified an improvement in yields and potentially also in room rates (as discussed further below).
<b>Benchmark Land Value</b>	Negligible existing use value, due to level of refurbishment costs. However, some level of landowner premium could still have been justified.	This conclusion still applies.
<b>Proposed D1 space -capital value</b>	£260,124	This conclusion still applies.
<b>Profit</b>	15% on GDV	This remains a reasonable profit.
<b>Construction costs</b>	Our Cost Consultant estimated these at £7m.	Applying cost inflation to bring them up to present-day, gives £7.64m.

- 1.9 We have updated our cost consultant's estimate to allow for cost inflation over this period. The Tender Price Index (TPI) was 298 in Q1 2017 and is now 316 in Q2 2018. The location factor for Camden was 124 in Jan 17 and is now 128. This is an increase of 9.46% to the £7.0m build costs, which would give £7.64m.
- 1.10 We have considered changes that occurred in the hotel market since early 2017. Savills' *Hotel Investment Report* shows a sharpening of yields over late 2016 and the whole of 2017. Based on this data, we suggest that a 0.5 percent point reduction is suitable. This pushes the capital values up to £4.8m-£5.5m.
- 1.11 With respect to hotel room rates, it should be noted that general commercial rates are unlikely to be applicable however our local research of commercial hotel rates has identified the following:
- York & Albany, NW1 7PS - at the time of our January report, it had double and superior double rooms for £175 and £250 per night respectively. This is currently very similar, at £175 and £255 per night respectively, and the

minor increase may not necessarily represent a general inflation of rates but rather month-to-month variation.

- Holiday Inn London Camden Lock, NW1 7BY - our January report cited double and superior rooms for £199 and £230 respectively per night. This is now £212 and £256 respectively

- 1.12 By comparison average daily room rates (ADR) projected at £137 for the proposed hotel reflect its social enterprise nature and its target market.
- 1.13 There is limited evidence of an increase in room rates. Some of the hotels appear to show an increase thus we have applied a 10% increase. Combined with the suggested yield shift detailed above, this gives a £5.4m-£6.1m range of capital values.
- 1.14 Based on the above adjustments, it is therefore clear that the £1m potential increase in capital values, when taken in combination with the £0.64m increase to construction costs (plus additional finance costs and professional fees on top of this), is insufficient to overcome the substantial deficit range of £3.3m-£4.0m. The increase may also be notional given the room pricing structure.

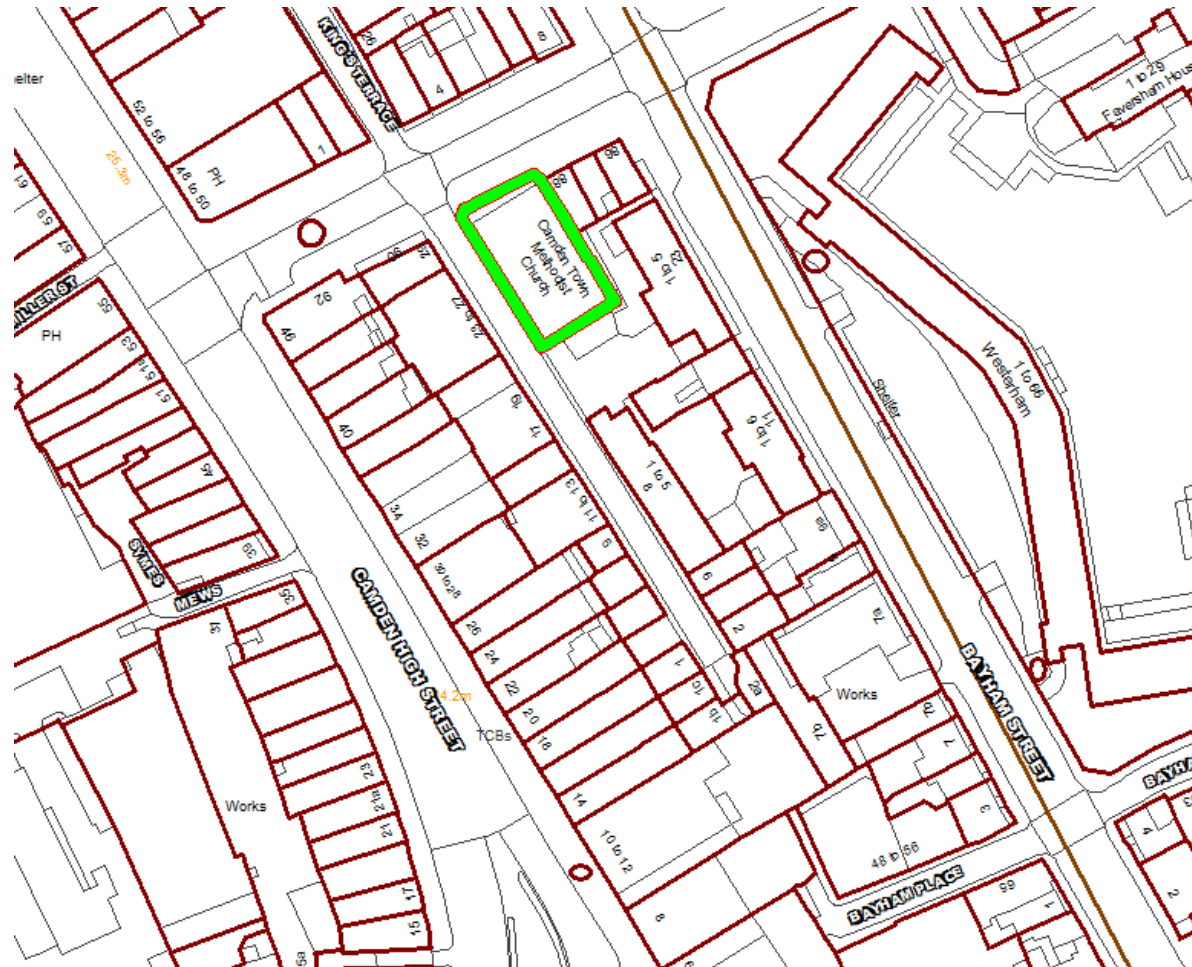
#### Alternative scenario - BPS assessment

- 1.15 We have considered the appraisal with the top floor switched to residential. This involves a loss of hotel space on each floor to make way for a residential access core. The sketch plans and drawings by Manolo & White shows 26 hotel rooms, reduced from the original 39. This reduces our latest estimate of capital value from £6.1m to £4.1m.
- 1.16 The residential floorspace is shown as comprising 3 two-bed flats. The floor's GIA is shown as 242 sqm which is 2,604 sq ft. Assuming an 80% GIA to NIA ratio, this gives 694 sq ft per apartment, and 2,083 sq ft in total.
- 1.17 We have applied £775,000 to each apartment based on nearby comparable evidence including among others:
- 2 bed flat for sale Pratt Mews, London NW1, £800,000. This is 700 sq ft.
  - 2-bed flat of sale Pratt Mews, £900,000. This is 807 sq ft.
- 1.18 The total residential value is £2,325,000, and with the £4.1m hotel value, this gives a total of £6.3m, which is higher than the maximum revenue we calculated for the proposed scheme (as per para. 1.13, above).
- 1.19 Our Cost Consultant, Neil Powling, has estimated the cost of provided the access core, which he has estimated at £250,000 which includes the cost of the lift, lift shaft and stairwell. The £7.64m build cost is increased by circa £130,000, which accounts for the higher rate per sqm of residential, and the reduction in hotel floor space due to the loss of the floor and the encroachment by the new core.

- 1.20 Taking the increase in build costs that we calculate as a result of adding in residential (due to the cost of the access core), but also the lower BCIS rate for residential than hotel, this would add circa £130,000 to the costs (after allowing for adjusted finance and professional fees).
- 1.21 In conclusion, it can be seen that the addition of residential does actually have a limited impact on viability, in spite of the loss of hotel floor area as a result of the extra core being provided. This is because the much higher values per sqm of the residential floorspace (£868 per sq ft, compared to £421 sq ft) help counteract the negative impact of loss floorspace to the new access core. Taking our upper value of £6.1m as the hotel GDV (for the proposed scheme), the alternative scheme is shown to very similar - with a circa £70,000 improvement in viability shown. However, a high degree of accuracy cannot be achieved at this stage given that the alternative scheme is only in sketch form.
- 1.22 In conclusion, it appears that the alternative scheme (hotel, with residential on the top floor) generates a broadly similar residual land value to the proposed scheme. And both schemes are shown to generate a viability deficit. The deficit for the alternative scheme is in the region of -£2.9m thus this scheme can be considered unviable, although as already stated this viability position is little different from that of the proposed scheme.

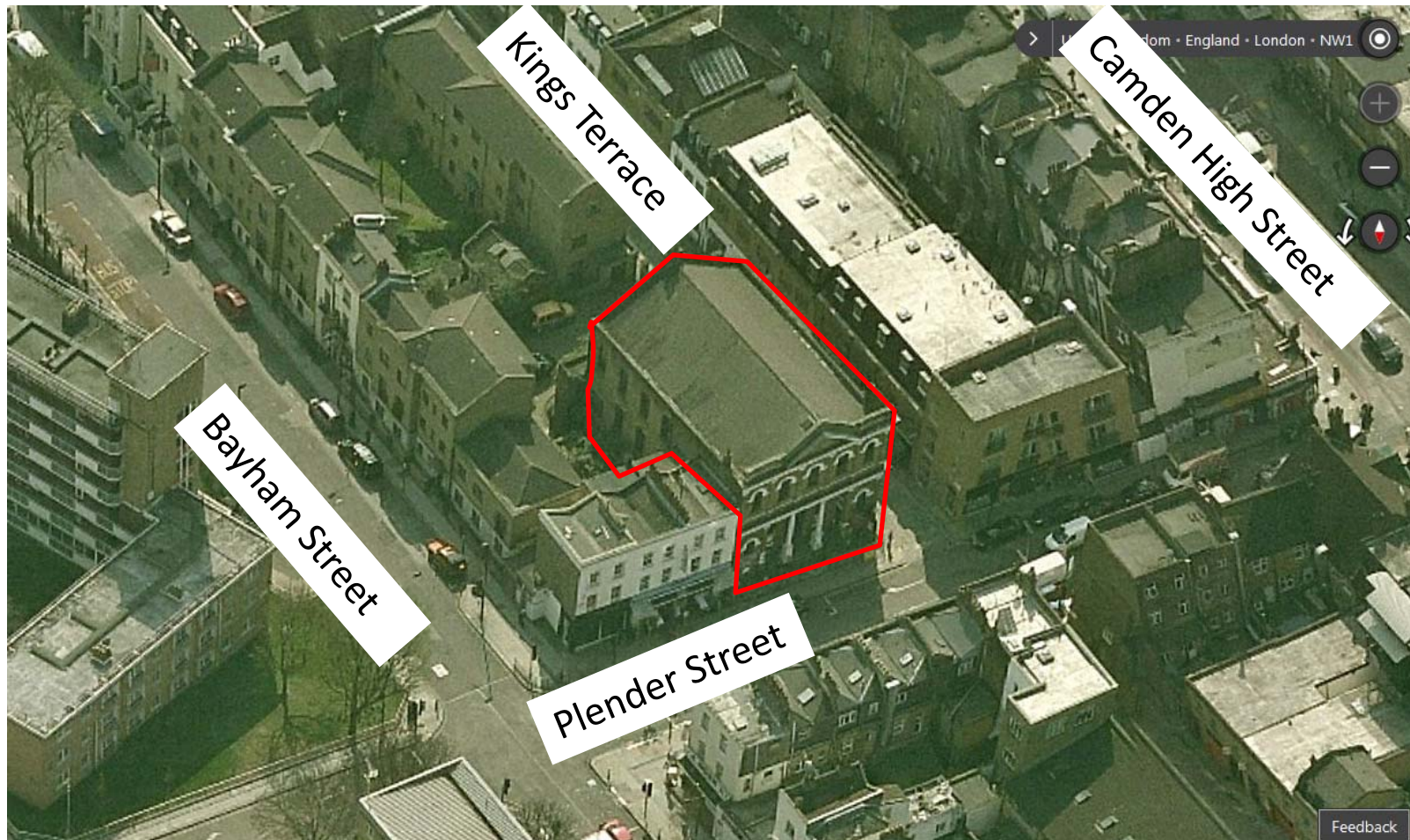
# Camden Methodist Church

## 2016/6490/P



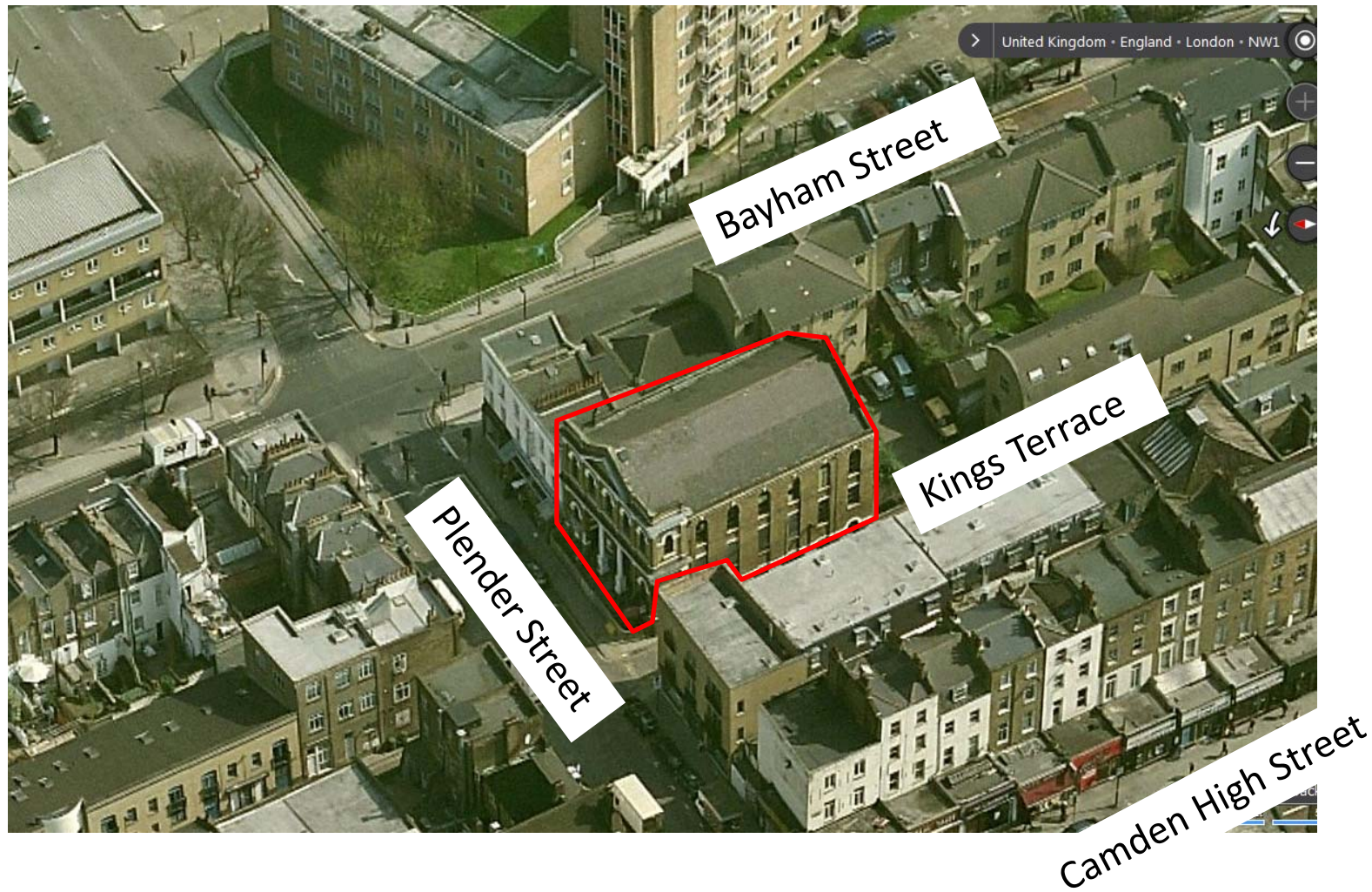


# Aerial View looking South West



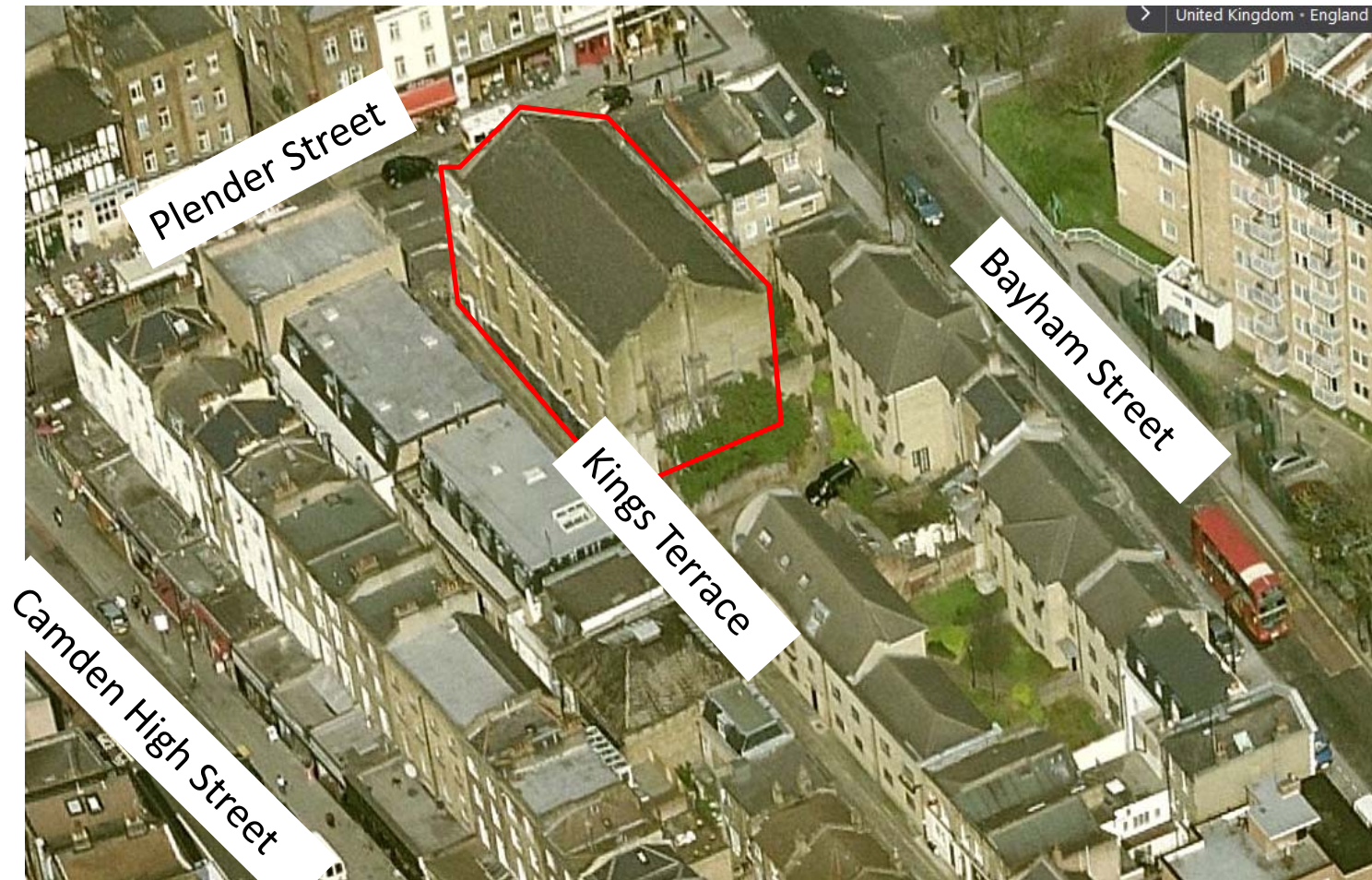


# Aerial View looking South East



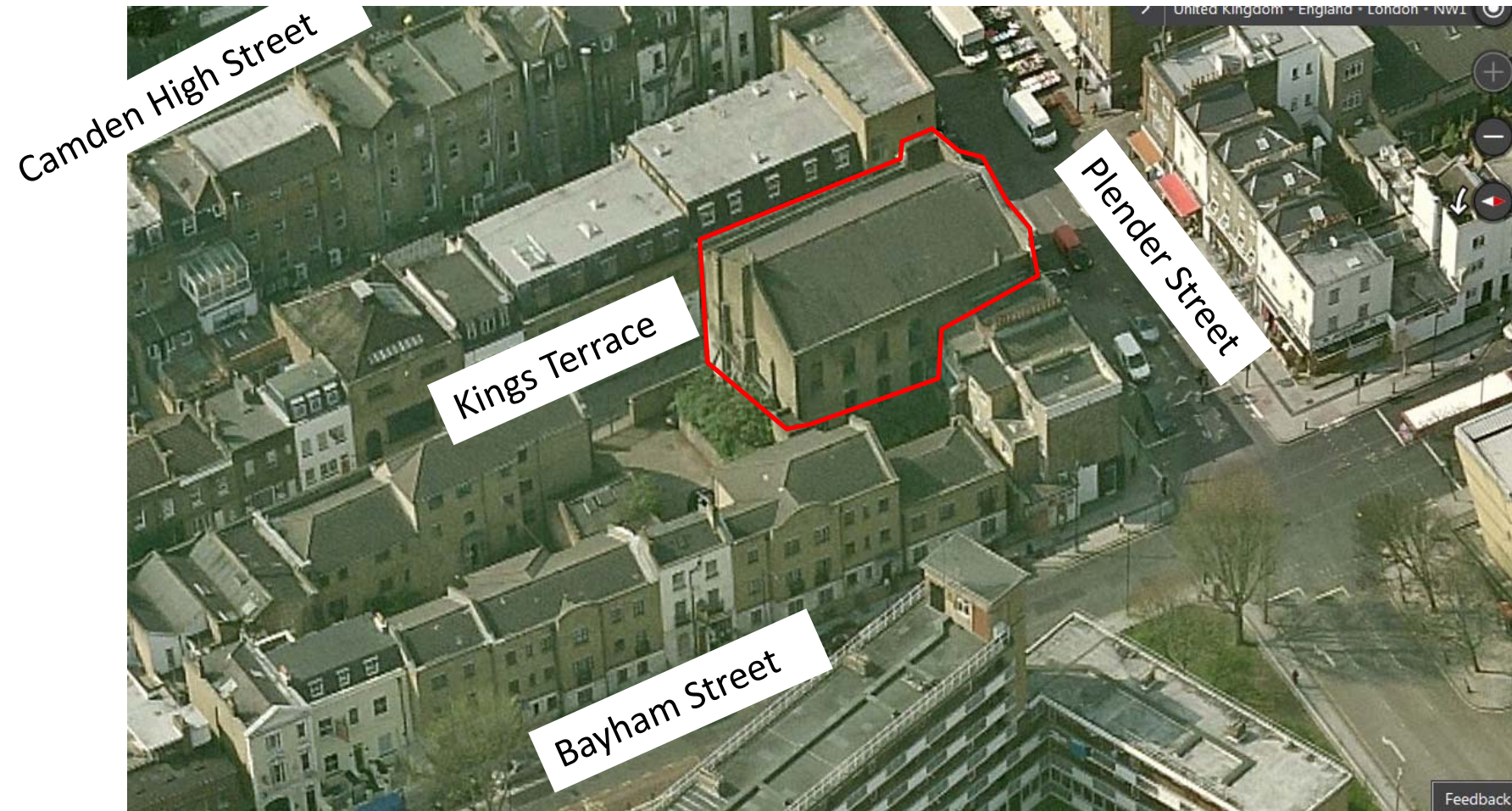


# Aerial View looking North East





# Aerial view looking North West



# Front elevation (looking south)





# Rear Elevation (looking north) ivy covers structural shoring



# King's Terrace (west) elevation





# Long view from Plender Street of East Elevation



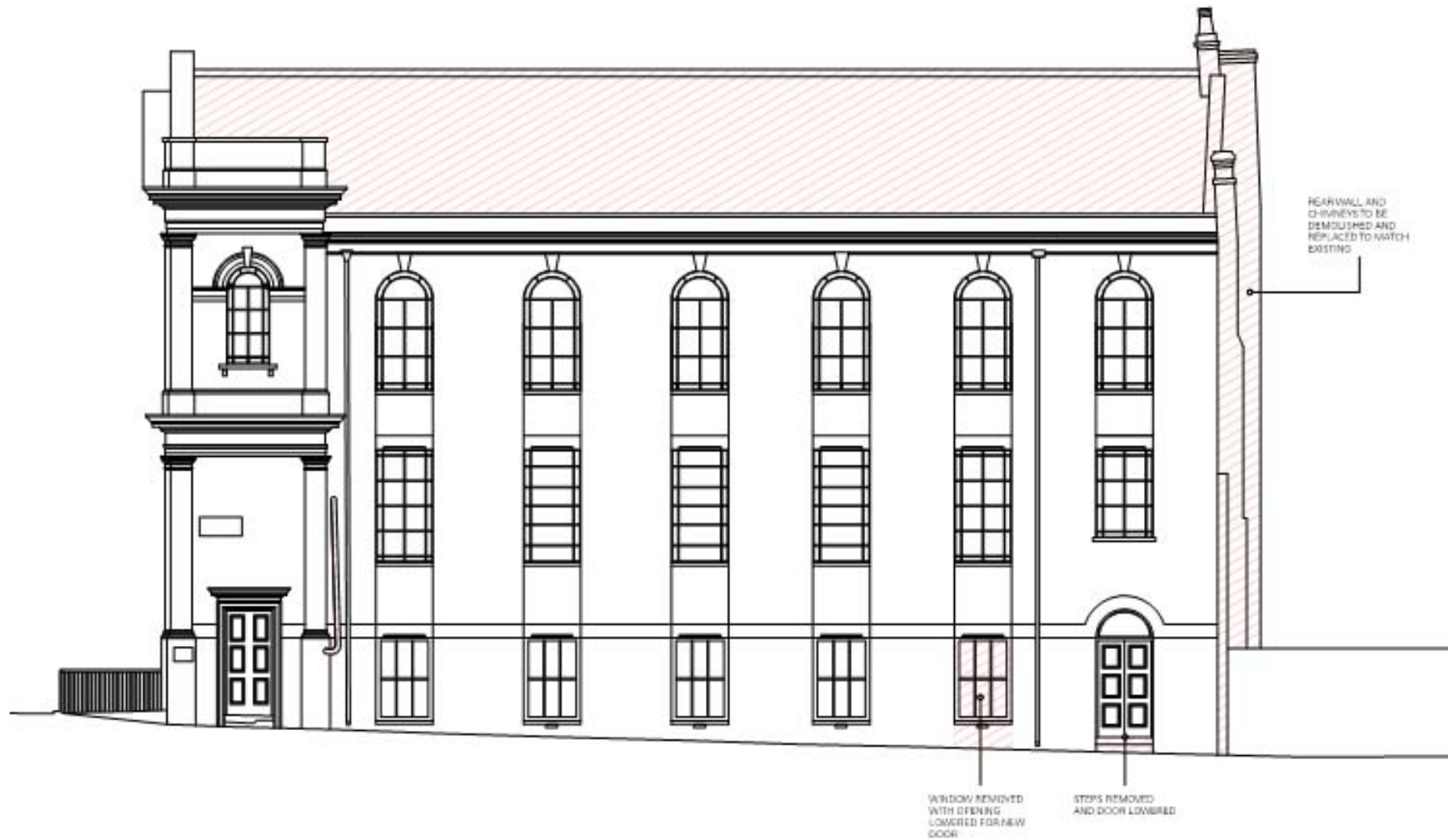
# Existing North (front) elevation



# Proposed north elevation



# Existing West (King's Terrace) elevation





# Proposed west elevation



# Existing east elevation



# Proposed east elevation





# Pre-App scheme – June 2015



## Refused Scheme (2015/7007/P – refused 2/6/2016)





# PROPOSED SCHEME



# Illustrative East Elevation (long view)





# Illustrative east elevation street scene



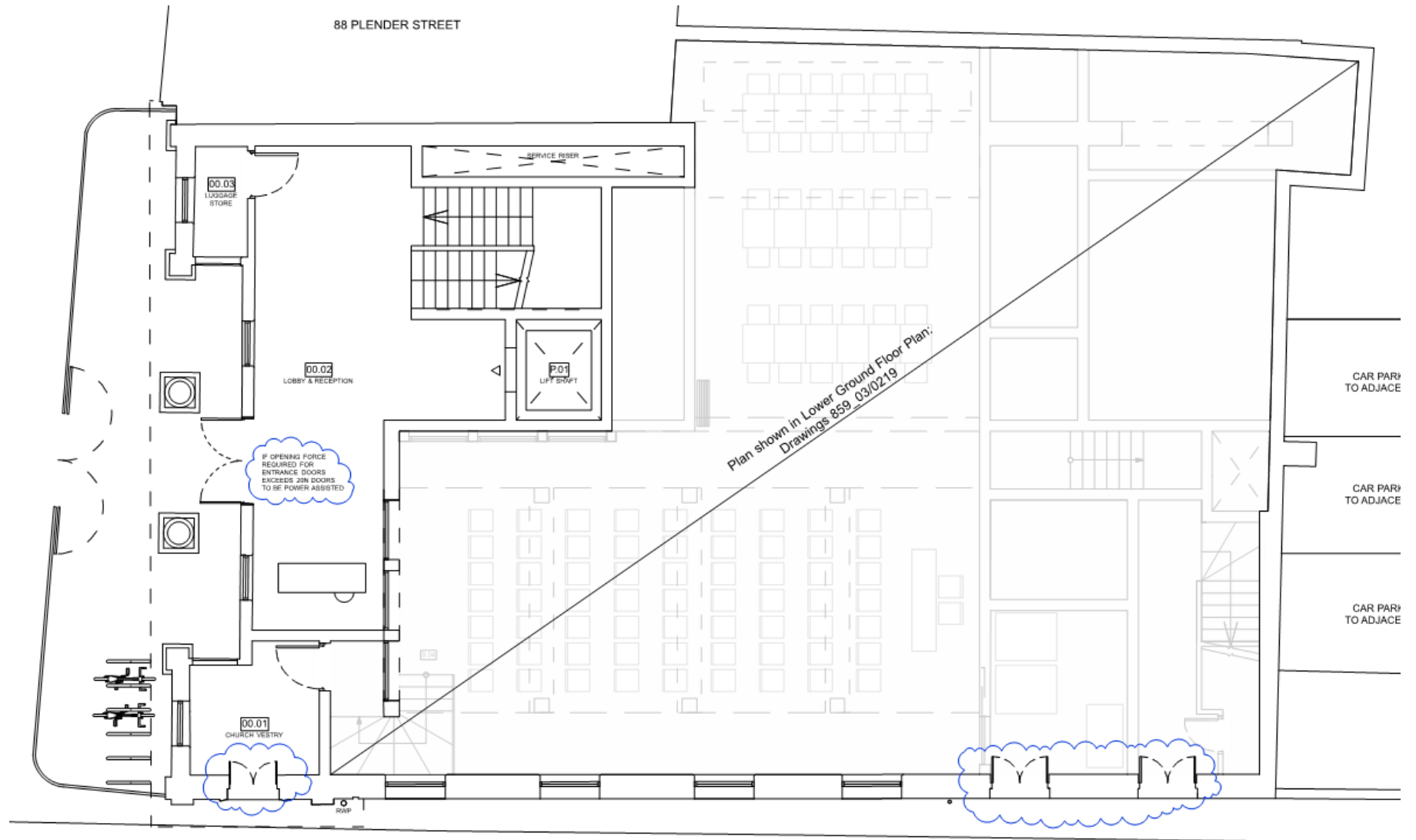


## Illustrative view [ Plender Street looking east]

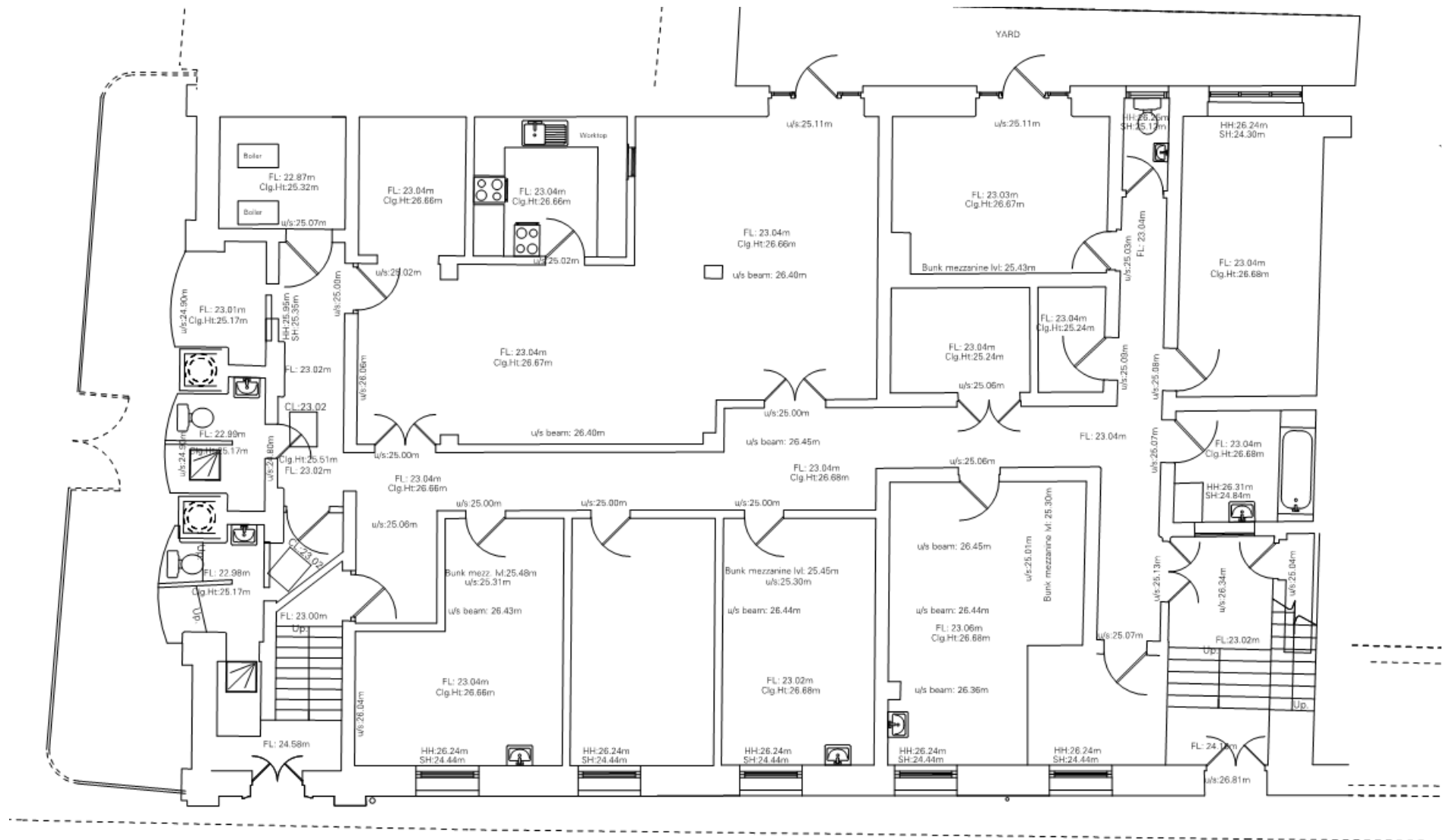




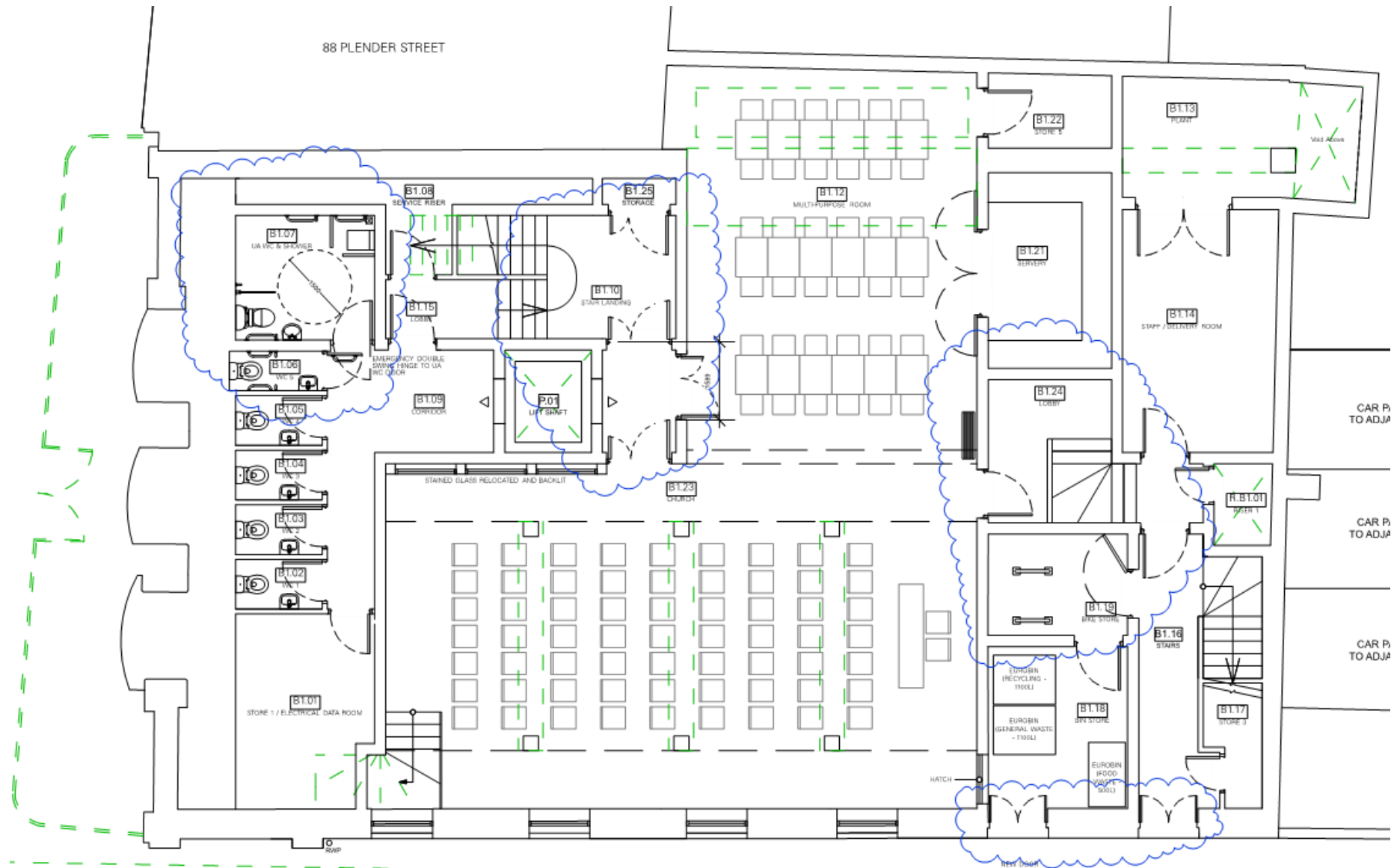
# Proposed Ground Floor Plan



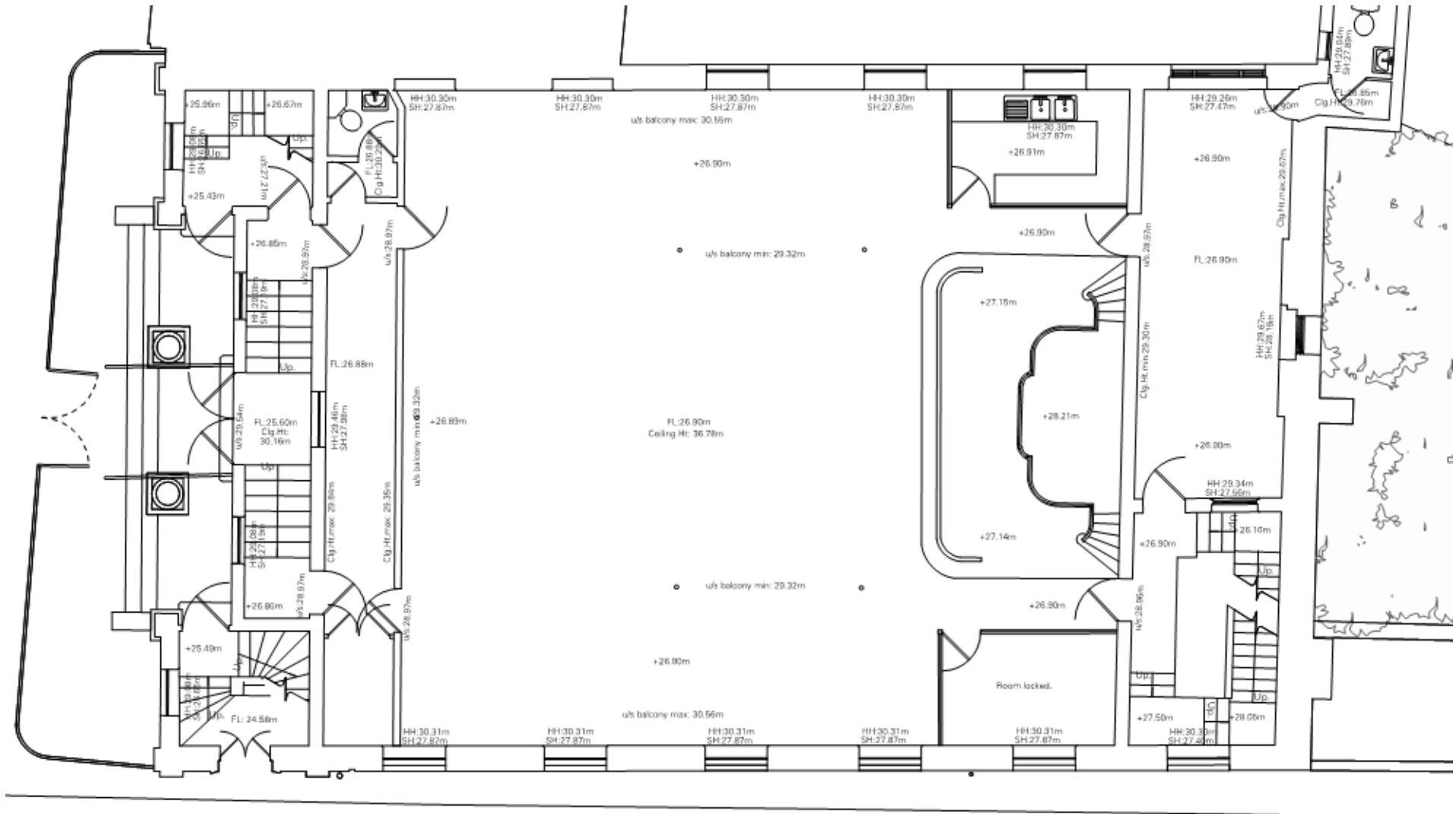
# Existing lower ground floor plan



# Proposed lower ground floor plan

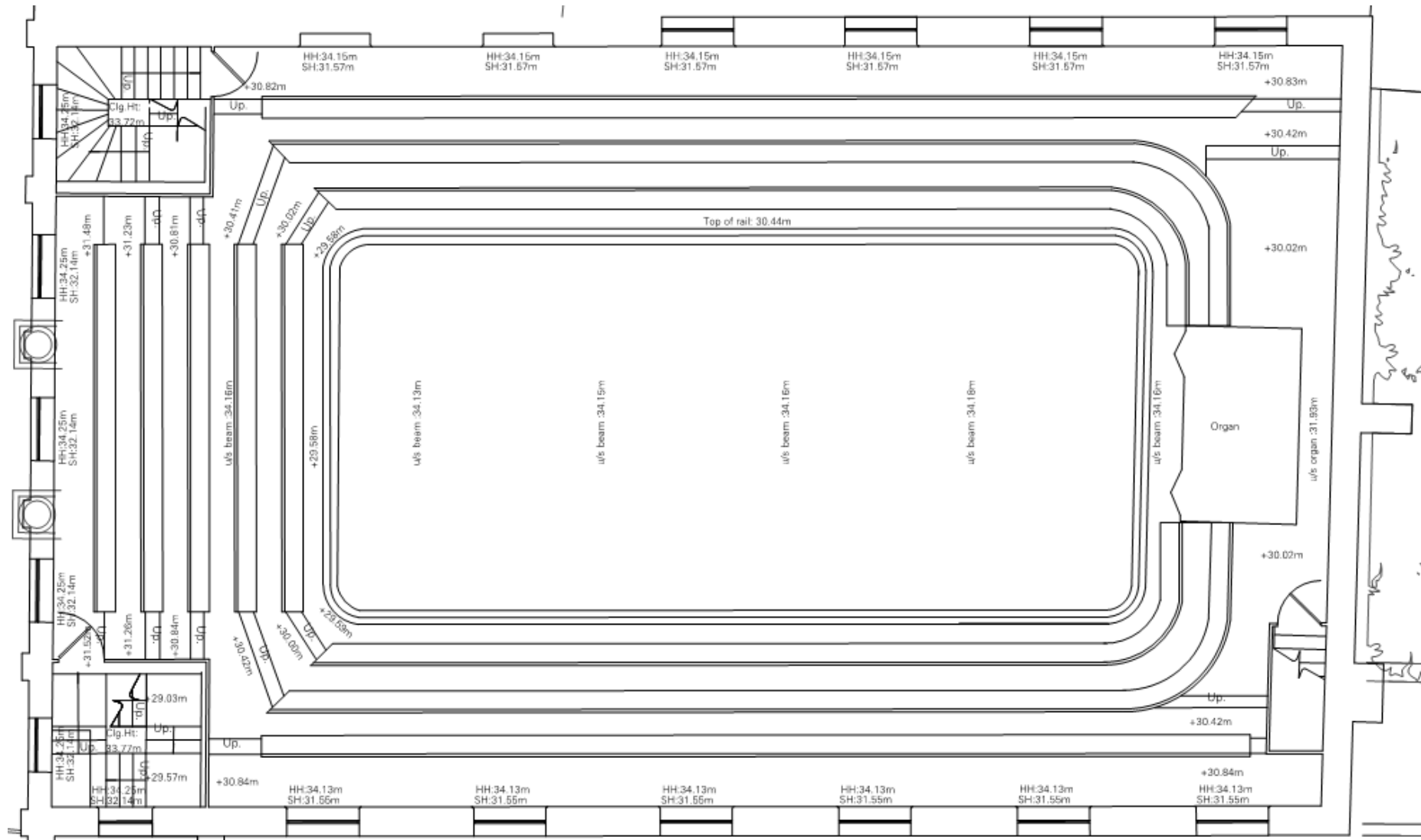


# Existing upper ground floor plan

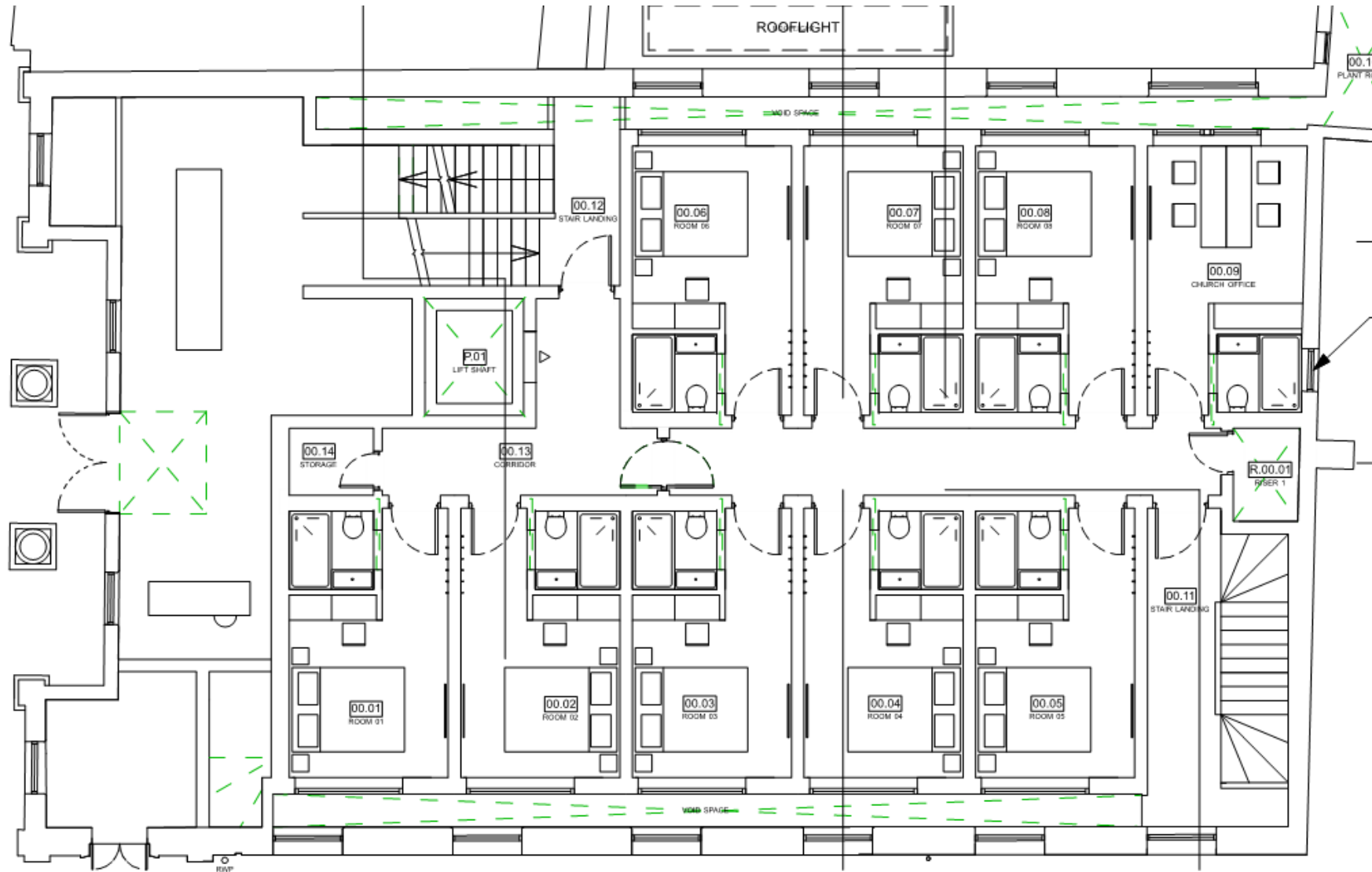




## Existing first floor plan



# Proposed upper ground floor plan

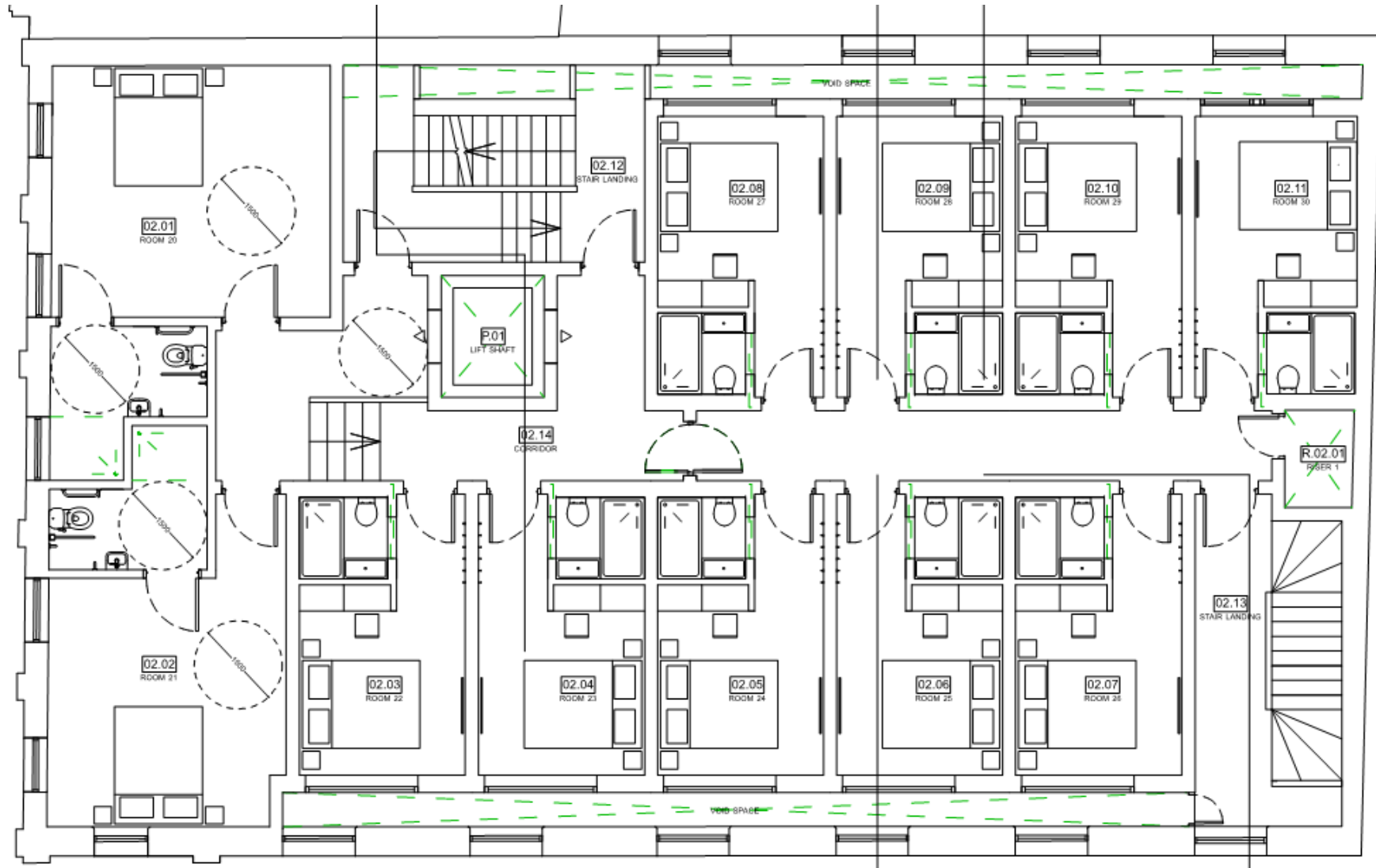




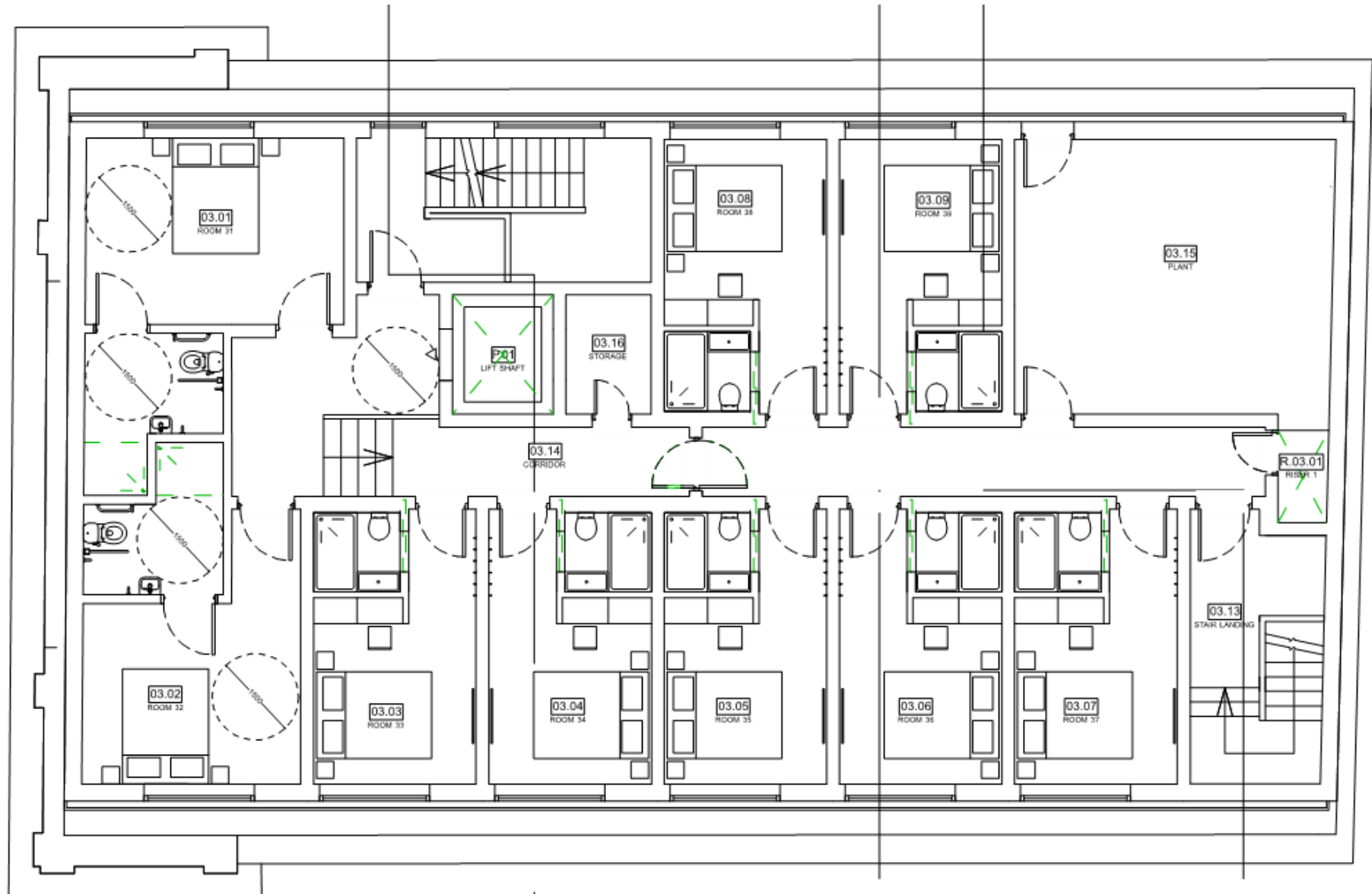
# Proposed first floor plan



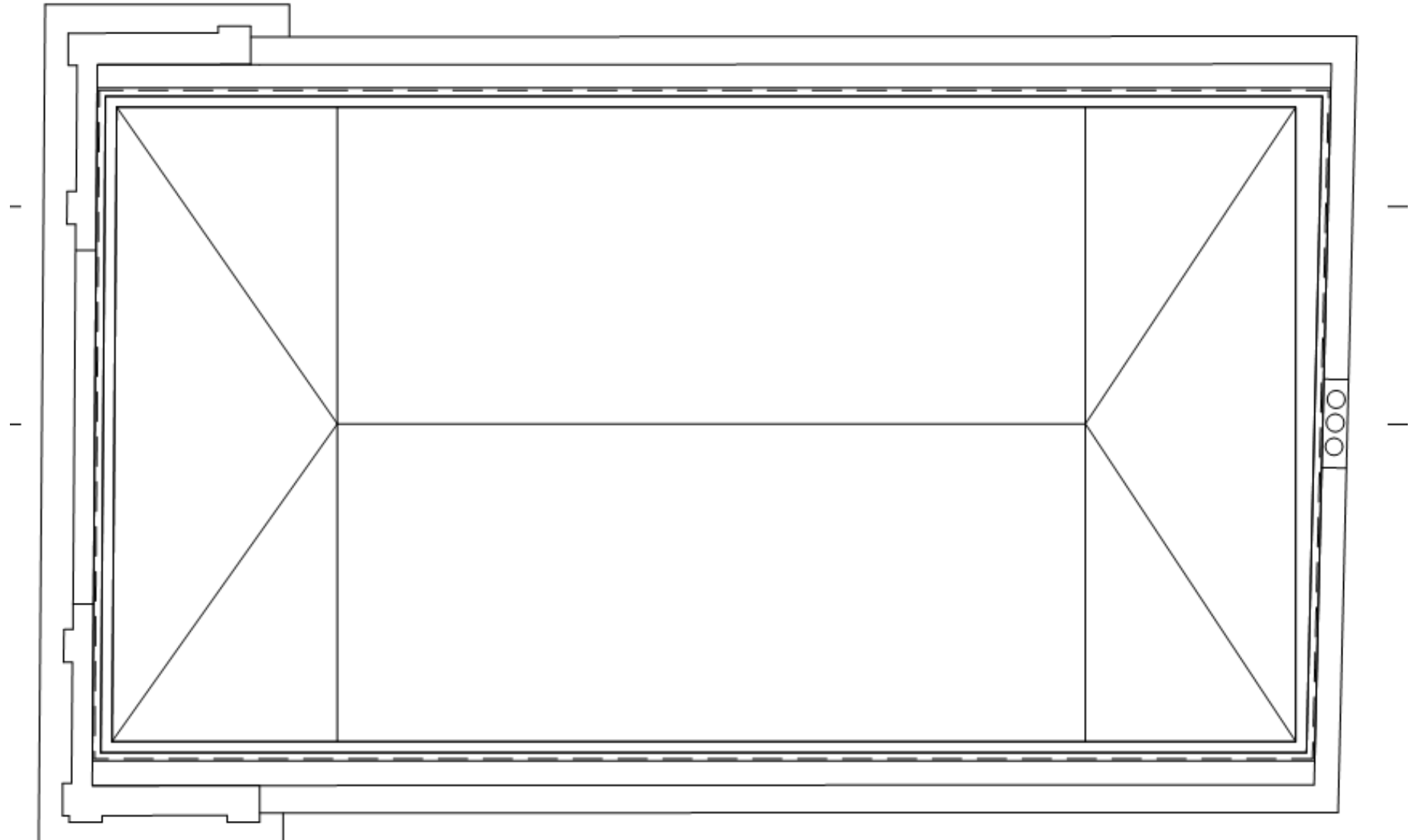
# Proposed second floor plan



# Proposed third floor plan



# Proposed roof plan



# Existing and proposed cross section

