Response to Public Consultation Comments

1931 Camden Road Hostel

22 July 2020







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Introduction

A second round of public consultation was held by the London Borough of Camden (LBC) for the replacement of an existing hostel at 248-250 Camden Road with new family temporary accommodation in June 2020. This document contains the responses from the project team to comments received.

The consultation ran from May 26th to June 23th 2020. Comments were received online via the 'We Are Camden' Portal and a dedicated email address for the project. An online event was held on June 17 with key residents, local groups and councillors where further comments were received.

Comments have been collated and grouped into themes resulting in a series of questions that will be answered in this document. The table below provides a summary of key issues raised and the associated response.

Issues Raised	Comments and Actions
Can the height of the building be lowered?	 In response we have looked again at how the current proposed height of the building was arrived at. In order to meet the brief we have to provide sufficient units of temporary accommodation for Camden's homeless families. There are restrictions on increasing the footprint of the building. A reasonable floor area for each unit of accommodation must be provided to ensure the wellbeing of families and improve upon the conditions currently found in homeless hostels. These factors have necessitated the current height of the building, so we are unable to alter this aspect of the proposal. Please see page 9 to see more information on studies carried out to understand the effect of the proposed height.
What is the impact on neighbouring residents? (daylight and sunlight) How and when will we be able to assess the impact on us?	 In response to the query we checked the research. The studies carried out so far on the current design indicate that the impact is mostly within acceptable limits. The measurement of daylight and sunlight impact is a technical exercise, and the report about it will be published as part of the planning application. Residents will be able to assess the impact on their property and comment directly to the planners Camden officers will discuss any adverse impact on specific properties with the individual residents concerned, and comments can be made directly to the planners. See page 9 for more.
Why is it necessary to have an external staircase? Can't this be contained within the building? Is there a fire risk or safeguarding risk associated with this?	 We revisited the design options that were considered during design development to ensure the reasoning for this solution is still valid. The external staircase allows us to provide a better quality of accommodation within the main building; providing a greater area of floor space, and dual aspect to each unit. The client has considered the safety aspects and is satisfied that the external staircase does not pose an adverse fire risk or safeguarding risk, and an independent fire risk assessment will be undertaken for the building. Please see pages 6 and 19 for further details.

We have revisited our options appraisal to look at the possibility of putting the access decks being at the front/Camden Rd side of the building and the rationale for the current design.

Overlooking, privacy and ASB

a) Can the building be 'flipped' so that access and walkways are at the front of the building?

- Having the deck access at the back makes the rear garden more usable for families with children. This is desirable, though we accept that this represents a change for neighbouring residents, as the rear garden is currently poorly used.
- The Camden Road side of the building faces onto a busy and polluted road so offers a lesser quality of accommodation for residents.
- It would also be less acceptable to accommodate an external staircase at the front of the building.
- The Temporary Accommodation team has asked for a single point of entry and access through the building. This will be staffed continuously and provides a more secure environment for the homeless families.

Please see page 19 for more.

b) If people are standing around on balconies they will be directly overlooking the properties in Camden Mews We've looked again at the design of these walkways and how much space is provided outside each flat to assess whether this is likely to be an issue.

The amount of space is limited to 1.8m, with 1.2m of this being walkway.
 This design does not lend itself to prolonged stays and there is no provision for tables and chairs for groups to gather.

See page 30 for more details.

We spoke to the client about how the space will be managed:

- The Temporary Accommodation Team has confirmed that the rules they will
 provide for residents will include restrictions on the use of the walkways
 and outside spaces.
- The building will be staffed 24 hours 7 days a week. Any problematic behaviour or breach of the rules regarding use of the walkways and access space can be tackled immediately.

c) More active use, along with the proposed new buildings in the rear garden may impact on the privacy of neighbouring residents.

The new 'community' building is very close to some of the houses in Camden Mews. Will the new buildings cause a security risk ie people climbing onto them?

In response to these concerns, the position and height of the new buildings was considered:

- We redesigned the roof so that it slopes downwards towards the back, reducing the height of the back wall to 3.3m – which is 1.4m above ground level – and thereby mitigating the impact on the windows of neighbouring buildings
- The roof will be greened for environmental purposes and in order to provide a more pleasant aspect for neighbours.
- A planted buffer is being created which will defend the border between the garden and neighbouring properties, more fencing has been introduced to ensure residents do not enter this planted area.
- We will consult residents about the landscaping in the rear garden.
- Only hostel residents will use this building and the hours of use will be limited and enforced by the on site staff.
- The building itself acts as a buffer between the courtyard garden and the mews properties.

Additional information provided on page 12.

Conservation Area: what consideration has been given to the impact of the design on the Camden Square Conservation Area?

A report on heritage is included in the planning application and this will be assessed by the specialist planning officer for heritage. The Conservation Area Committee will be invited to comment to the planners. The impact on the Conservation Area was also considered as part of the remit of Camden's Design Review Panel during the design development. A conservation officer was also involved thorough the consultation process with the council. See pages 11 and 16 for more.

The consultation process is unclear and the design that was originally presented is materially different from the current proposal.

The brief for the project has not changed; even though the design for the building has developed over time. We have been consulting on the same proposal.

- The Statement of Community Involvement for the project forms part of the planning application documents and sets out how we consulted on the design.
- Once a planning application is validated and published, the Local Planning Authority will carry out a statutory consultation before producing a report for the planning committee. So the consultation process is not yet over. See page 40 for additional details.

The Existing Building

The Existing Building

Why is the existing building being demolished?

The existing building at 248-250 Camden Road was completed in the mid-1970s by Camden Council. It is of limited architectural interest and is neither statutorily nor locally listed, and is identified as a "neutral" contributor to the Camden Square Conservation Area.

During Stage 1 of the design process the project team focused on developing an option where the building was refurbished but the study showed that the scheme would not be viable because:

- The communal spaces and units created would not meet the standards expected of new temporary accommodation in Camden
- The energy performance of the refurbished building would not match that of a new build
- The number of units created would not meet the target required.

What is going to happen to the existing residents?

The existing hostel provides temporary accommodation for single females. Camden Council recently re-developed two new single-person's hostels elsewhere in the Borough. Residents of 248-250 Camden Road will be relocated to the new buildings making the site available for redevelopment to provide improved hostel services.











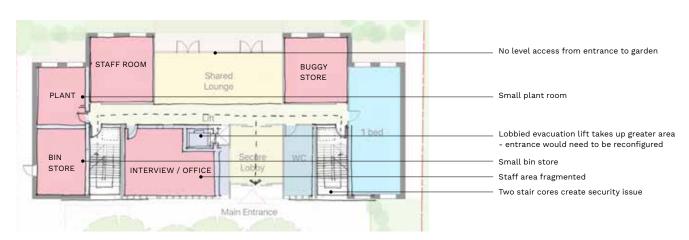
Refurbishment and back extension





New build





Top: Stage 1 options developed by Architype **Bottom:** Study of refurbishment option outlining key concerns





Height

How much larger (height and massing) is the new building?

The proposed building is 6.5m higher than the existing building.

Is the increased height going to have an impact on the light to neighbouring properties?

A daylight and sunlight study has been carried out which concludes that the proposed scheme is acceptable in daylight and sunlight terms. The document will be available for the public to review as part of the planning application, in the conclusion it states that:

"taking into account the overall high level of compliance with the BRE recommendations, and the mitigating factors set out in section 4, the proposed development is acceptable in terms of daylight and sunlight"

Mitigating circumstances: some windows that do not pass are under existing overhangs or projecting wings, where there are shortfalls they are borderline, the use of a couple of rooms could not be confirmed, and one of the windows that fails is one of four windows that serve a room.

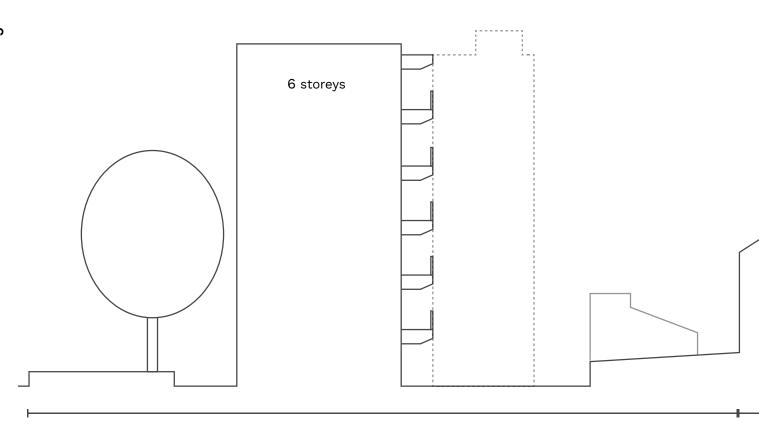
Additional Information

The height of the proposal has been developed through a thorough consultation process carried over 4no. pre-application meetings and 2no. Design Review Panels.

The planners, including the conservation officer, and DRP panellists agreed that the views from Camden Road show that the 6 storey building proposed does not compromise the pattern of the street and could be seen as a continuation of the stepped roofscape of the villas created by chimneys and dormer windows. It was also considered that the mature trees along Camden Road and the building set back allow for the additional height without having a negative impact on the area.

We have also carried out an additional study to review the proposed massing against the wider context. Looking at a section through the site it can be seen that there are other buildings of a similar height in Camden Square Conservation Area such as the North Villas which are only a couple of roads down from the site.

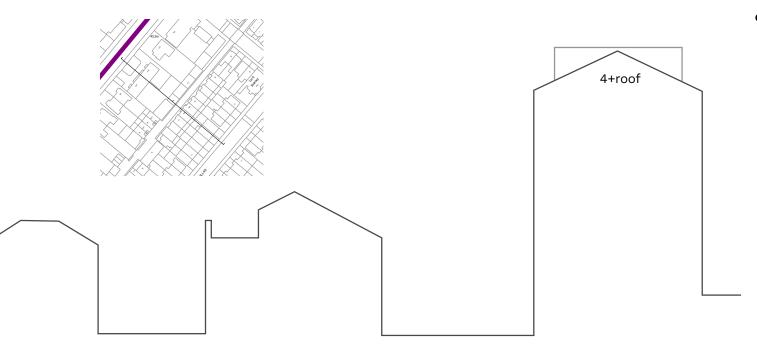




Camden Road Hostel

Top: Elevation showing height increase between the existing and proposed schemes





Camden Mews North Villas

Top: View north walking along Camden Road showing an initial massing study to test the impact of the added height

Middle: Site plan showing section cut

Bottom: Section cutting through the site, Camden Mews and North Villas

The Rear Garden

How much further back does the new building go compared to the original?

The new building is 1.5m further back than the original.

How far is the stair from the mews properties?

The stair is 11m from the mews properties.

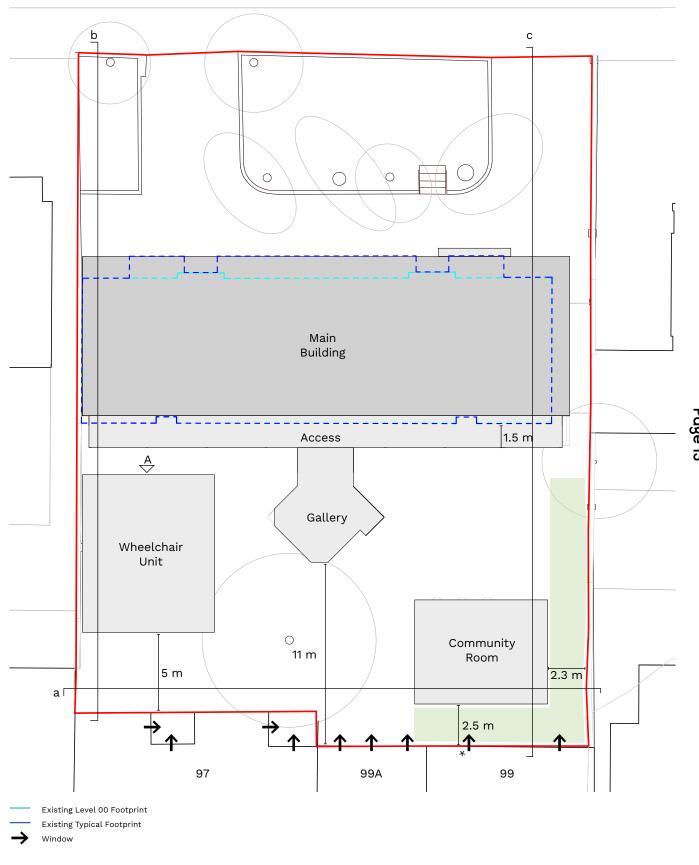
What are the new buildings in the back garden? How high? How close to the neighbouring properties?

The wheelchair accessible unit is a fully accessible 1 bed unit for up to 4 people (typically 1 adult, 1 teen, and 2 children). It is sunken into the ground and sits next to the boundary wall on the west side of the site. It is 4m high.

The community room is a communal space provided as extension of the residents' living space, activities in the room will be managed and include after school clubs and yoga classes. The space will only be used by the residents. At consultation the room was 5.4m high at the front and 4.6m at the back. We have introduced a planted buffer behind the structure to ensure this space is not used by the residents maintaining the privacy of 99 and 99A Camden Mews.

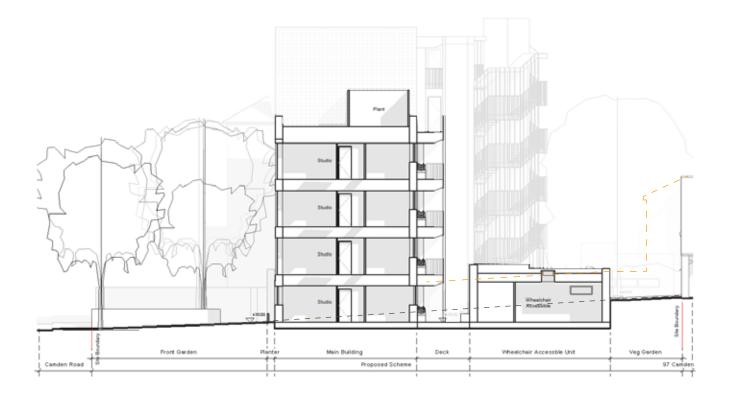
As a response to comments received we are reducing the height of the whole building by 400mm and sloping half the roof to reduce the height of the back wall to 3.3m (1.4m above ground). This ensures none of the windows at 99 Camden News are blocked by the building and provide window * with an outlook into a planted buffer and green roof.

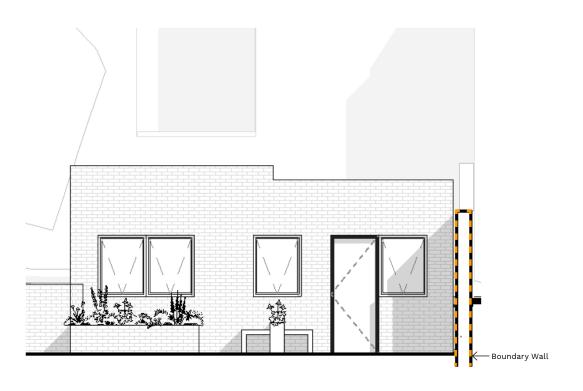
CAMDEN ROAD



Top: Diagram showing the relationship of the structures in the back garden with their context

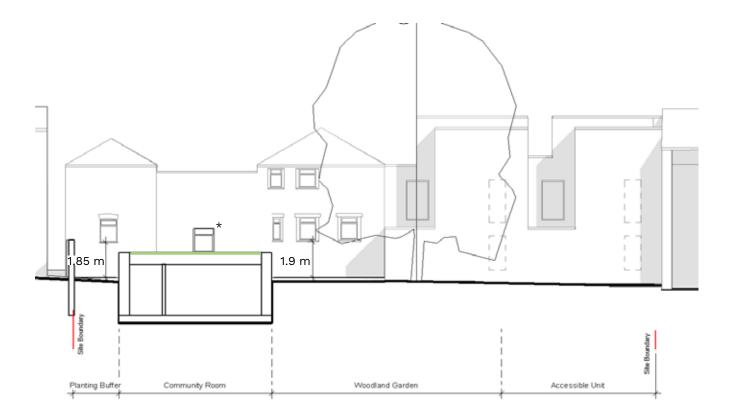


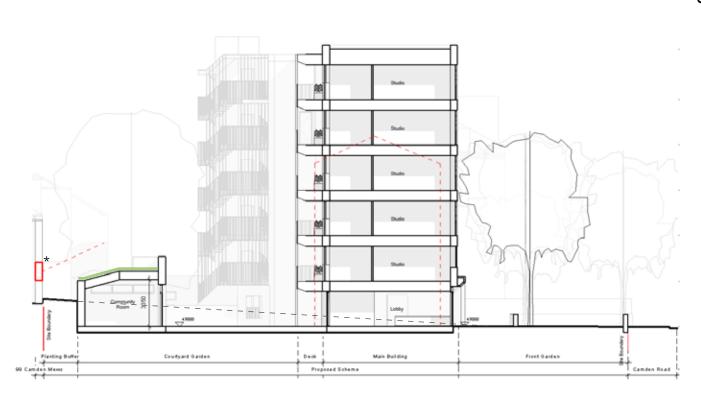




Top: (a) Section through the wheelchair accessible unit showing the current site slope in brown and the outline of the boundary wall in orange **Bottom:** (A) Front elevation of the wheelchair accessible unit showing it's relationship with the boundary wall







Top: (b) Section through the back of the community room showing its location in relation to neighbouring windows **Bottom:** (c) Section through the community room showing the amended roof design and its relationship to window *

Appearance

How does the building respond to the conservation area?

Why have terracotta tiles been selected? Why is the Camden Road facade so simple?

The building steps on each side to respect its context and continue the stepped roofline of Camden Road, it has also borrowed elements from neighbouring properties by creating a brick podium, emphasising the entrance and responding to the scale of the windows of neighbouring properties.

Camden Square Conservation Area has always pushed the boundaries architecturally (Camden Mews, for example, is home to eclectic modern buildings) and the unique site conditions allow for a creative response here. As such, during the consultation process the team was encouraged by the DRP to design a building that would reflect its context but also have its own architectural character and be a modern addition to the conservation area.

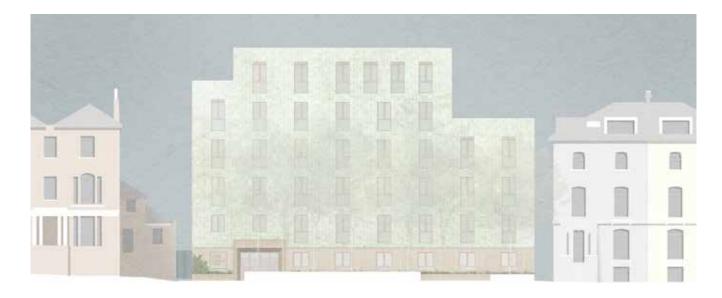
The mature trees along Camden Road are a key feature of the site and became an inspiration for the material selection, the glazed terracotta and muted design will reflect the shadows of the trees and act as a calm ever-changing background reinforcing the green moment of relief provided by the trees along the trees and thus responding positively to the streetscape

Glazed terracotta is also very hard wearing, and as a consequence does not weather in the same way that brick might – it retains its inherent depth and vibrancy for many decades after installation. The material has been used to good effect recently in the borough, seen in examples such as Commonwealth House, which provide a rich and robust finish.

The cladding material is also compatible with the modular construction system that has been chosen for the project.



Bottom: Illustrative view of the hostel from Camden Road showing the relationship between the glazed terracotta and the trees





Top: Illustrative Camden Road elevation **Bottom:** Illustrative bay showing the entrance to the hostel

Layout

Access and The Rear Garden

Why has the access been moved to the back of the building?

Properties in the area have their main access at ground level, upper storeys are accessed via internal circulation. Similarly, the main access point to the building is from Camden Road, the upper storeys are accessed from the access gallery in the rear.

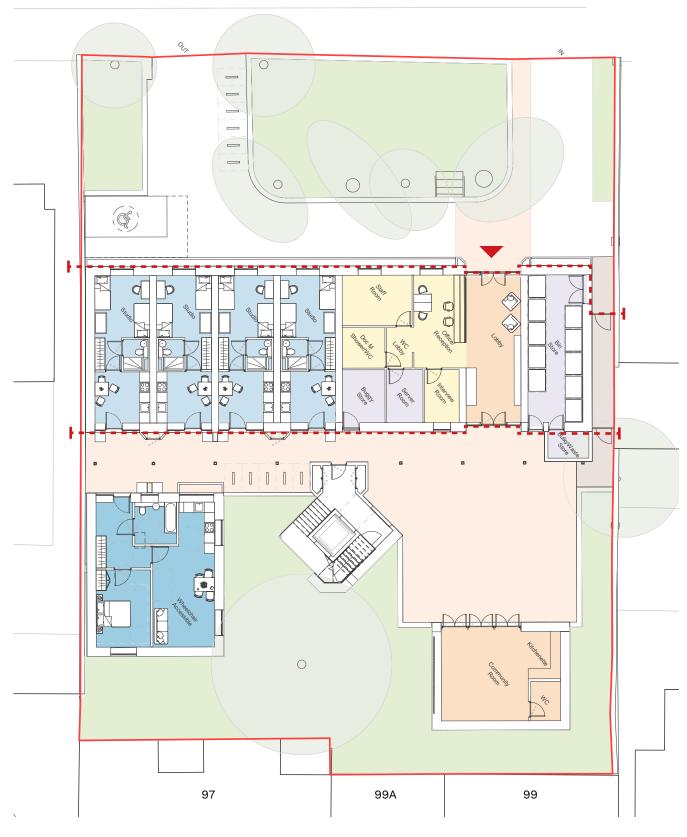
Couldn't you 'flip' the design, so that the access gallery was at the front of the building? How wide is the access gallery?

Safeguarding has been a key part of the design, our aim has been to ensure that once residents cross the 'airlock' secure line they can be in their home, use the communal room or the garden without having to be exposed on Camden Road, we have been careful to achieve this by ensuring the bin store is accessed from behind the secure line for example. Flipping access to Camden Road would remove the feeling of security and sanctuary we have tried to create. We have also aimed to make all units double aspect to ensure they are full of light and none face Camden Road only providing the residents with a home that improves their quality of life.

The access gallery is 1.8m wide with 1.2m clear for access.

The Chester Road scheme gallery looks into a private courtyard, why does this scheme look into other people's gardens?

The garden in the hostel is a private garden, the scheme has been designed following Camden's amenity guidance to ensure privacy is maintained for neighbouring properties.



Top: Diagram of the ground floor showing the secure line highlighted in red





Additional Information

Having decided to focus on a new built proposal the team explored various site layout options which were assessed with the planners. The diagrams on the next page show two double stacked layout alternatives which impacted the TPO trees in the front garden, the existing building line, and the habitable room distance between the scheme and the properties on the mews.

Following the consultation event we developed the diagrams below to test flipping the circulation as suggested. This showed that this approach would also impact the elements highlighted above in addition to the impacting the safeguarding of the residents.



Top: Diagram of the flipped circulation option 1 showing how habitable room to habitable room distances would be under 18m

Bottom: Diagram developed as a response to option 1 showing how maintaining the 18m distance required by Camden would push forward the building line along Camden Road and impact the TPO trees.







Top: Diagram showing double stacked option 1, the building would be significantly deeper than the existing failing to meet the 18m overlooking distance set by Camden

Middle: Alternative to option 1 impacting TPO trees and not achieving the 18m distance for the whole building

Bottom: Diagram showing preferred layout



Access and The Front Garden

How will access work for the residents? Will they have to use the side entrance?

Access for residents will be through the secure reception, the reception will be staffed 24hrs a day and all entrances fobbed for security, the side entrance will only be used for maintenance.

How will vehicular access work?

Vehicle access to the site will be maintained with an in-and-out loop, which allows for cars and small vans to enter and leave the site onto Camden Road in a forward gear. The loop has been reversed compared to the existing to allow access from the north entrance ensuring access can be easily monitored by staff from the lobby/office. All other vehicles will back into the site if needed. One parking space is provided for the wheelchair accessible unit.

The front garden appears underutilized.

One of our goals has been to maintain the trees in the front garden, particularly the TPO trees. This has limited the development potential of the front garden, the layout will be maintained pretty much as it is, paving and planting will be upgraded to create a much nicer environment for the residents and neighbours.





Top: Diagram of the ground floor showing access routes

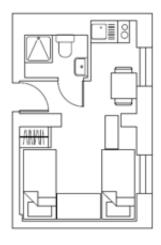


The Units

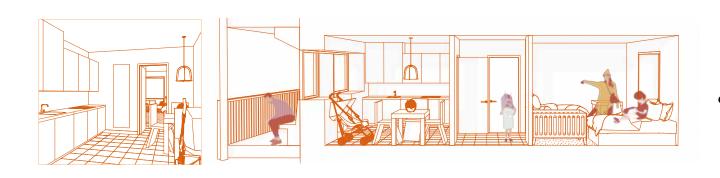
The units seem small, why are there only a few family sized units? Why are the bedrooms on the noisy side of the site?

There is no guidance for this sort of accommodation so Camden developed its own brief based on HMO guidance. We have improved on this brief and have carefully designed the units to ensure they are as efficient as possible. The maximum occupancy of each unit type is shown below.

Our scheme focuses on creating a sanctuary for residents as they cross the secure line, as such we have created a strong relationship between the living space and garden. The units have also been designed to allow the clear separation of the sleeping and living areas, we have worked with our acoustician to ensure the sleeping area is peaceful.



18.5m² 3 occupants (2 + cot) Ensuite Shower Room Kitchenette





Studio

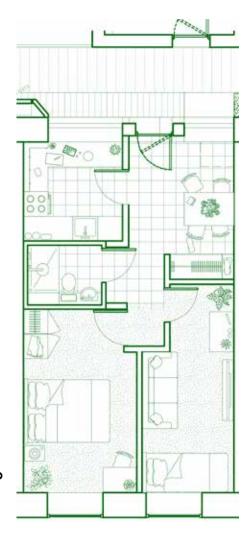
Max occupancy:

- 1 adult
- 1 child
- 1 baby

Top: Typical layout for existing accommodation showing the improvements we are

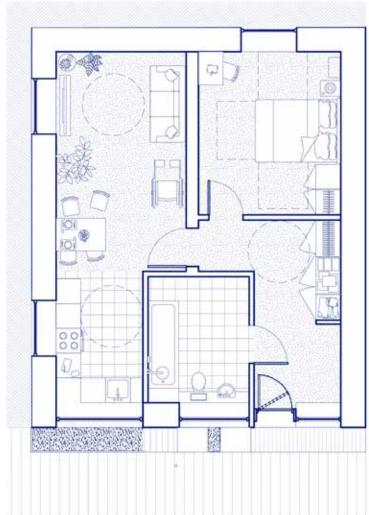
Middle: Illustrative section of the studio showing possible furniture arrangement and its connection to the access gallery

Bottom: Illustrative plan of the studio unit showing 2 examples of how it could be inhabited



1 Bed

Max occupancy: 1 adult 1 teen 2 children



1 Bed Accessible

Max occupancy:

- 1 adult
- 1 teen
- 2 children

Top: Illustrative plan of the 1 bed unit showing how it could be inhabited **Bottom:** Illustrative plan of the 1 bed wheelchair accessible unit showing how it could be inhabited

Overlooking, Privacy & Noise

Overlooking

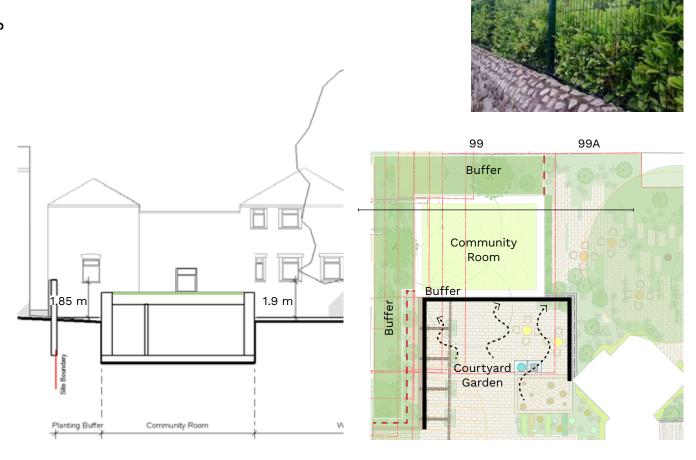
How will the privacy and security of residents be protected?

We have followed Camden's amenity guidance to ensure there are at least 18m between the access gallery and the windows of habitable rooms of the properties on Camden Mews to ensure the privacy of residents. We have also taken mitigation measures such as the green buffer behind the communal room and ensuring windows in the garden units face into the site. 97 Camden News has no ground floor windows so the rear windows of the accessible unit do not present a privacy issue.

Currently a portion of the garden near 99 and 99A Camden Mews is only used for storage and is not accessed by residents, how is the privacy and security for residents going to be maintained?

We have introduced concealed fencing into the planting buffer to further discourage residents from accessing this area behind the communal room. The window sill of most windows on the back elevation of the mews properties sit at around 1.9m from the ground meaning that residents using the gardens will not be able to look into the properties.

The part of the garden that we envisage will be most occupied is the courtyard and community room, as such the community room itself acts as a buffer between the courtyard garden and the mews properties.



Top: Image of a concealed fencing precedent for the planting buffer Bottom: Section through the back of the community room showing the relationship of the building with the adjacent windows Bottom: Landscape plan of the courtyard garden and community room showing the location of the concealed fencing in red and the building acting as a buffer



Top: Diagram showing the overlooking distance between the hostel and the mews properties and the location of windows in the rear garden



Access Gallery

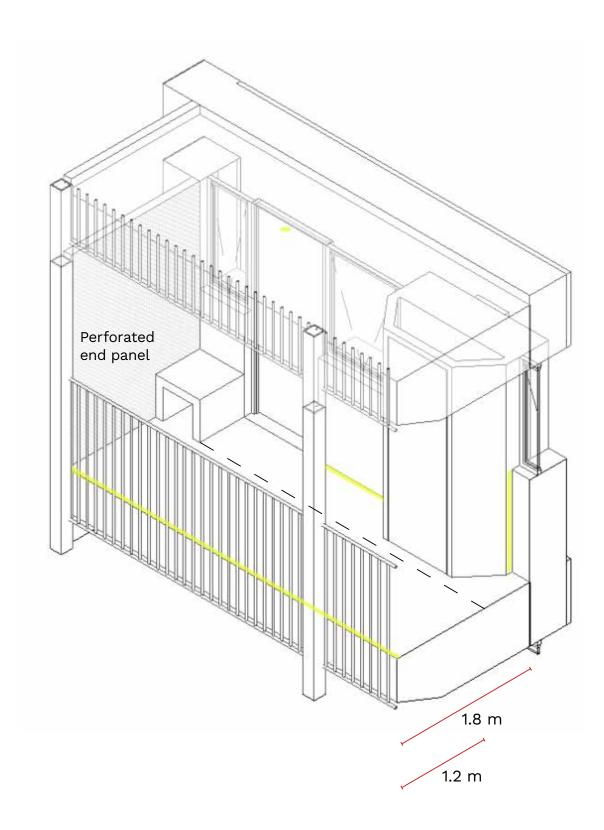
The gallery and access core appear to increase the sense of overlooking felt by some residents and can potentially increase the noise and light pollution, how is this going to be mitigated?

The main purpose of the gallery is to provide access to the units, a small fixed sitting area with planting is provided for each unit, this inhibits residents from placing their own furniture in the space an offers a small seating area only suited for occasional use.

The gallery is 1.8m deep, 600mm are occupied by MVHR cupboards and the fixed seat leaving 1.2m clear. As such, the depth and layout does not lend the space to be used like a balcony, the building will also be managed to ensure residents do not misuse the space.

Lighting on the gallery needs to be developed in the next stage of design but we intend for it to consist of emergency lighting and lights on PIRs to unsure lighting is only on when needed. The diagram on the right shows possible lighting options.

Following feedback from the consultation, the ends of the gallery are now clad with perforated panels to provide additional privacy to neighbours.



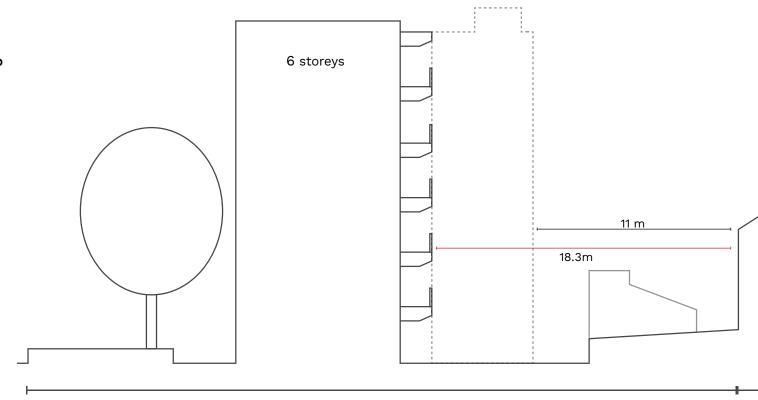
Top: Diagram of the gallery showing possible lighting locations

Additional Information

As mentioned earlier, we have studied the relationship of the scheme with its wider context, in doing so we found that the overlooking distance between Camden Mews and the proposal, exceeds that between Camden Mews and the North Villas.

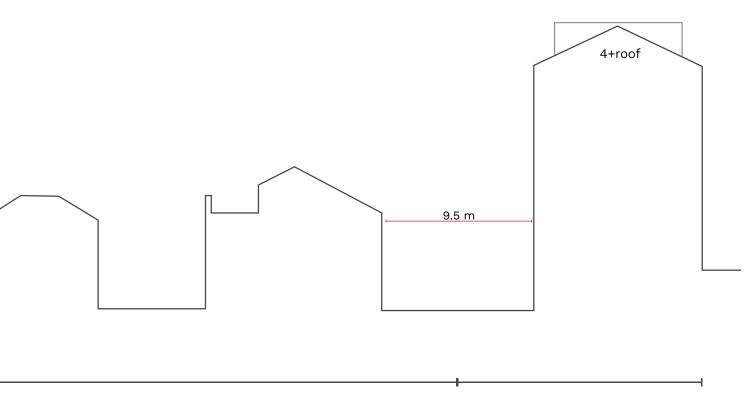
We have also looked at Ashton Court, a newly built residential development on Camden Road. We found that the elevation facing Camden Mews has balconies that are proud of the building line and look to be wider than the access gallery proposed.

In both cases it appears that the conditions created by our proposal are not worse than those already existing in the area.



Camden Road Hostel





Camden Mews North Villas

Top: Streetview of the back elevation of Ashton Court facing Camden Mews **Bottom:** Section cutting through the site, Camden Mews and North Villas highlighting overlooking distances

Occupancy & Security

Occupancy & Security

Will there be more people living there?

The maximum occupancy is 120 people which assumes 42 adults (including young adults) and 78 children. It is unlikely that this maximum would be reached as, for example, not all studios will be occupied by an adult, a child and a baby, some might be occupied by an adult and a baby only.

What is the profile of residents? How long are they expected to live in the accommodation?

The hostel will offer accommodation for individual families for periods of several months to up to 2 years.

What will happen to the single homeless people living there? Does this mean there's no provision in future for single homeless people?

Two hostels are being built by Camden to house single homeless people.

Will there be an adverse impact on local schools, health services and transport? Introducing homeless people into the area will reduce the sense of security in the area, what measures are going to be taken to manage this?

Is this location appropriate for homeless families?

The location has been selected for family accommodation due to its proximity and ease of access to family facilities like Torriano Primary School, Brecknock Primary School, Cantelowes Gardens. The site is also close to Camden Town centre providing opportunities for employment.

How will security work now that the existing gates are being removed?

Neighbours have experienced problems with anti-social behaviour in the past, rubbish being thrown over fence, people climbing over the fence, how is this going to be managed?

Security has been key in the development of the scheme and a secure 'airlock' entrance sequence has been created. The site will also be managed 24 hours a day and will be equipped with CCTV.

We have designed the building to ensure it is secure for residents and also provides an environment that will encourage their journey into settled housing. Planting has been used to create friendly buffers to neighbouring properties. Opening windows will be on restrictors to ensure they are only used for ventilation.

Additional Information

The proposed use is a hostel for homeless families. In planning terms, this is a sui generis use, i.e. one that falls outside of the uses specified in the Use Classes Order. It is an established use at this site, given the existing hostel was built in the 1970s and has been in this use since then.

As a sui generis use, there are no specific planning policies relating to density of hostel accommodation. Overall, the Camden Local Plan (2017) confirms that the Council seeks to encourage "high quality developments with high densities" (para 2.8). The Local Plan also states that "good design can increase density while protecting and enhancing the character of an area" (para 2.11) and the proposed development has been designed to achieve these twin goals.

The provision of hostel accommodation is in accordance with Camden Local Plan Policy H8, which supports the provision of housing for homeless and vulnerable people. A number of tests are set out in Policy H8, which are assessed on the right:

Overall, the proposed use will provide a high-quality facility to provide accommodation for homeless and vulnerable people. The proposed development meets policy requirements for this type of use.

Policy H8 criteria "The development"		Response
a)	is needed to meet a demonstrable need within the borough and will be targeted at borough residents;	A review undertaken by the London Borough of Camden of its portfolio of housing identified a need to provide an uplift in the number of units for homeless families. The proposed development has been designed to meet this need. The development will contribute towards providing housing for Borough residents.
b)	will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and/or care;	The proposed development has been designed to provide a high level of independence to its residents. The proposed units are self-contained and provide adaptable living/kitchen rooms. A wheelchair accessible unit is proposed in the garden.
е)	will be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers;	The site benefits from good connections to public transport services. The site is within walking distance of Camden Town, meaning residents will be able to access shops, services and community facilities.
d)	contributes to creating a mixed, inclusive and sustainable community; and	The proposed building has been designed to accommodate the diverse community which may live in the building during its lifetime and the range of needs of these people.
e)	does not cause harm to nearby residential amenity.	The proposed development will occupy a similar footprint to the existing building. The rear garden units are single storey and have been designed to respect the amenity of neighbouring properties.

Top: Table showing how the scheme responds to H8 criteria



Offsite Construction

Construction would cause disruption to residents, what are the plans to mediate this during lockdown?

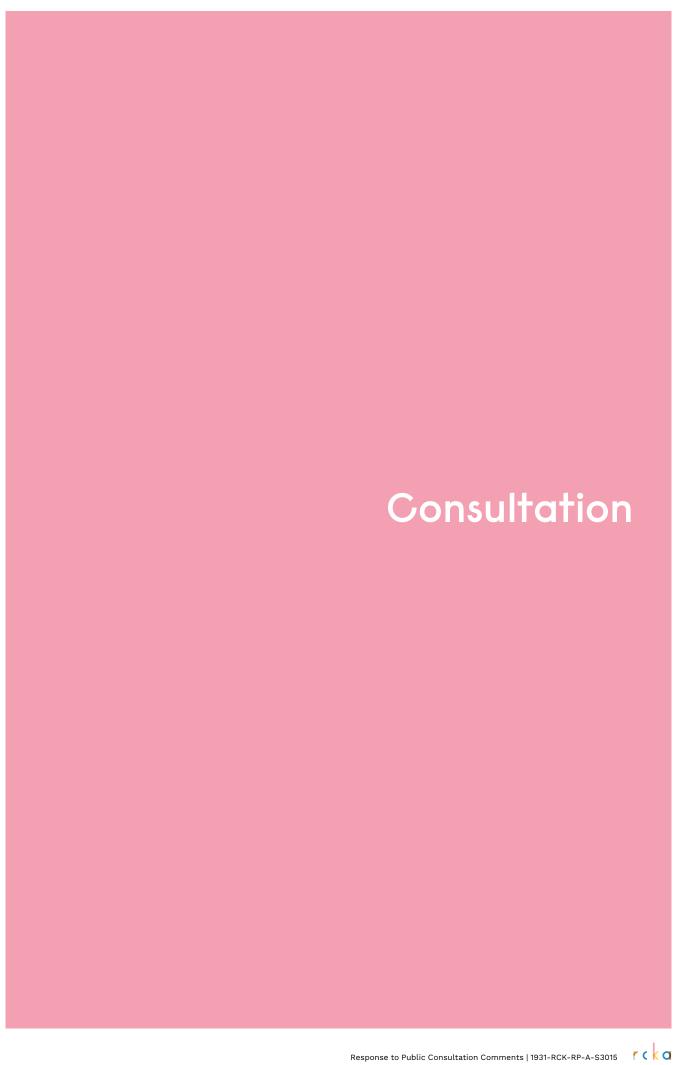
We are using offsite construction to deliver Camden Road Hostel. This will have many benefits including significantly reducing construction time on site. Units will be built in a factory and lifted into place on site.

Will building work have a significant impact on traffic?

Offsite construction will also mean a reduction on the impact to local traffic by having less deliveries compared to standard construction. The delivery of modules will be agreed with the relevant stakeholders to ensure it is done in such a way that it has minimum impact.



Top: Image of a residential unit in the factory before being taken to site



Consultation Process

When was the first consultation and what did people say?

The first consultation event was held on 11 July in the local community centre. A key concern at the time was the impact of the proposal on the existing single homeless people at the hostel. There were few comments on the design of the building.

A report on consultation – a Statement of Community Involvement - is included in the planning application.

This design seems to have changed significantly. Why was it changed?

Stage 1 focused on refurbishing the existing building. However once this exercise had been carried out it became clear this would not provide adequate accommodation to meet the brief. This meant that changing the focus of the project to a new build.

The scheme presented at the first consultation event was the first iteration of the new built scheme and proposed a 5 storey building with a larger footprint compared to the existing.

The brief for the project has not changed, so we have consulted on the same project throughout.

Has there been enough time to allow people to adequately comment?

After our public engagement on the latest design proposal, people expressed a view that they would like more time to comment, so the consultation period was extended by a week.

It would be useful to have more information, such as the daylight sunlight study in order to comment

Documents accompanying planning applications are not usually shared with the public until they are finalized, and the application submitted.

However, we have been able to discuss the general impact on daylight and sunlight with residents, and revisited the design where appropriate to test these concerns. For example, some of the changes made to the design of buildings in the rear garden have responded to these concerns.

The architect mentioned that the design had been discussed at a review panel. Does this mean the design is fixed?

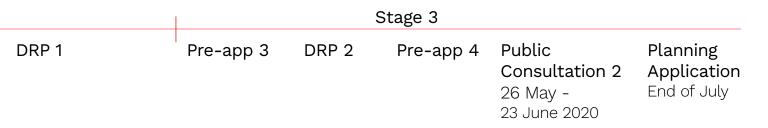
The design is not fixed until the planning application has been submitted, however key principles have been reviewed and agreed to with the planners and Design Review Panel. This process is regarded as good practice by the Local Planning Authority.

What are the next steps? Will there be another event?

What further opportunity will there be to comment and how will our comments be responded to? This document forms a broad response to those who took part in the engagement events. Where residents have commented on their specific, individual circumstances, council officers will usually engage directly with these households.

Once the planning application is validated and published, the Local Planning Authority will carry out a further period of consultation before the application is discussed at planning committee.





Bottom: Consultation timeline

