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Development Management
Hertsmere Borough Council
Civic Offices Elstree Way
Borehamwood
Herts
WD6 1WA

5th April 2024

Dear Sir/Madam

Application by International Society for Krishna Consciousness Limited for Full Planning Permission for the Change of Use of Residential Dwelling to Guest House Accommodation in Association with Bhaktivedanta Manor and Minor External and Internal Changes (Retrospective) at The Old Post Office, Grange Lane, Letchmore Heath, WD25 8DY.

I act on behalf of International Society for Krishna Consciousness Limited and I am instructed to submit a planning application to your Authority for full planning permission for the *"Change of Use of Residential Dwelling to Guest House Accommodation in Association with Bhaktivedanta Manor and Minor External and Internal Changes (Retrospective)"* at The Old Post Office, Grange Lane, Letchmore Heath, WD25 8DY.

The application has been submitted and paid for via the Planning Portal (Ref: PP-12786580).

Accordingly, please find enclosed the following in support of the planning application:

- i. Planning Application Form, signed and dated;
- ii. Relevant Ownership Certificate and Agricultural Land Declaration signed and dated;
- iii. Site Location Plan, Ref: FDC/24/04/01;
- iv. Block Plan, Ref: FDC/24/04/02;
- v. Existing Main House Ground and First Floor & Roof Plan, Ref: FDC/24/04/03;
- vi. Existing Main House Elevations, Ref: FDC/24/04/04;
- vii. Proposed Main House Ground and First Floor & Roof Plan, Ref: FDC/24/04/05;
- viii. Proposed Main House Elevations, Ref: FDC/24/04/06;
- ix. Existing Ground Roof Plan and Elevations (Outbuilding). Ref: FDC/24/04/07;
and
- x. Proposed Ground Roof Plan and Elevations (Outbuilding), Ref: FDC/24/04/08.

In addition to the above and enclosed, I would be grateful if you could take into account the contents of this letter in your consideration of the planning application.

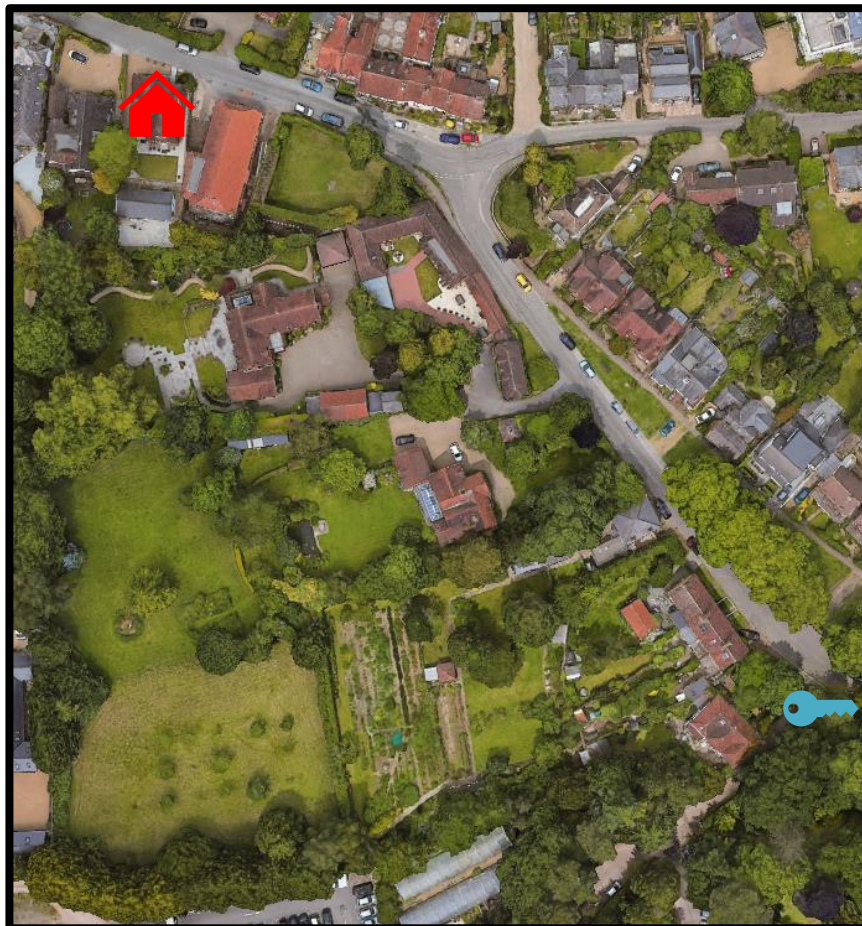
Site and Surroundings

The application site is located on Grange Lane in Letchmore Heath. The application site consists of a one-and-a-half-storey building with a rear garden and outbuilding. To the north, south and west are residential dwellings, and immediately to the east is Aldenham Memorial Hall.

The site's authorised use is Use Class C3, however the property is currently used as a guest house in association with the nearby Bhaktivedanta Manor site.

The site is located within the Letchmore Heath Conservation Area and the Green Belt.

There is pedestrian access to the Bhaktivedanta Manor site from Letchmore Heath Village. The guests who stay at the site will be provided with a key that allows them to access and open the pedestrian gate that is housed within the main gate. The snippet below shows that The Old Post Office (building symbol) is within close proximity to the pedestrian access point (key symbol).





Background of Applicant

The International Society for Krishna Consciousness (ISKCON) Limited (also known as the Hare Krishna movement) owns the Bhaktivedanta Manor, which is a Gaudiya Vaishnava Hindu Temple, with the pedestrian entrance located 0.1 mile/3 minute walk away and the vehicular access is located 1 mile away (3 minute drive) from the application site. It is ISKCON's largest property in the United Kingdom and one of the most frequently visited Radha Krishna temples in Europe.

By way of background, the site was purchased by George Harrison from the Beatles in 1973 and donated to ISKCON to further their theological activities for the benefit of the growing number of Hare Krishna devotees in the UK.

The Temple is now a nationally recognised Hindu shrine and Temple and also acts as the headquarters of the International Society for Krishna Consciousness Limited. Consequently, over the last four decades the Manor has become a highly important place of pilgrimage for those familiar with the Hare Krishna movement because of the association with the founder, Srila Prabhupada, who wanted the Manor to be a place of spiritual sustenance for its members and congregations where rural life coupled with Krishna Consciousness could be combined.

Planning History

A review of the site's planning history has been undertaken using Hertsmere Borough Council's online database. The following applications have been identified:

Reference	Proposal	Decision
TP/07/1386	Conversion of part of existing detached garage to habitable accommodation.	Withdrawn 12/11/2008 - no reason provided online.
TP/06/0118	Conversion of existing detached garage into part garage part habitable accommodation (Certificate of Lawfulness - Proposed).	Refused 20/10/2006 as the garage did not fall within the terms of permitted development due to the site being located in a Conservation Area.
TP/06/0487	Single storey rear extension to include room in roof and extension of existing conservatory to create a garden room. Replacement of all windows.	Permitted 19/10/2006.

Whilst the planning applications listed above do not specifically refer to the site as residential use, the decision notice for planning application TP/06/0487 included policies relating to domestic extensions and extensions. Therefore, this was confirmed at the time of the decision. No other applications have been submitted to change the use of the property, so the established use of the site is residential (Use Class C3). Furthermore, details of the property being sold as a house can be found online.

The site has been used as a guest house in association with the Temple for over 8 years, since August 2015. Those undertaking courses as visitors to the Temple stay in the property for very short periods of time, based on pre-arranged bookings.

Application TP/O6/O118 states that the garage was constructed in 1961. Application TP/O6/O487 was implemented before the site was purchased by the Applicant. However, the extensions constructed exceed the permitted plans slightly. Additionally, the previous owner modified the internal layout during the construction phase for reasons that remain unknown. This application seeks to regularise these changes.

The Proposal

The proposal seeks retrospective planning permission for the change of use of the building from residential to guest accommodation associated with Bhaktivedanta Manor, the Temple. No changes will be made to the elevations, floor plans and hard and soft landscaping.

The site is currently used as a guest house accommodation in association with the nearby Bhaktivedanta Manor site, and has been for over 8 years. Those who reside at the guest house mainly use the accommodation for sleeping purposes, and most meals are provided at the Temple, except for breakfast. Therefore, the kitchen area is not used frequently.

Whilst a guest house falls within the C1 use class along with hotels, the site does not and will not operate as a standard guest house taking bookings from members of the public. Visitors stay at the guest house only having booked a stay through the Temple, therefore the entire stay for visitors is managed through the Temple. Hence, rather than a C1 use, it is considered a sui generis use, or simply “guest house associated with the Temple” is sought.

Existing and proposed plans produced by Fayeh Development Consultants accompany the planning application. There will be no internal or external changes to the buildings. As noted previously, it is worth noting that the external and internal arrangements of the building differ slightly from the recently permitted householder application (ref: TP/O6/O487) due to variations in the construction phase. These relate to minor internal positioning of bathroom facilities.

Planning Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was updated in December 2023 and constitutes guidance for local planning authorities and decision-takers and is a material consideration in the determination of planning applications (paragraph 2). The NPPF has been considered during the design process of the proposed development.

Paragraph 11 of the NPPF emphasises the importance of sustainable development, including supporting economic, social, and environmental objectives. It encourages developments that promote social inclusion, offer a variety of housing types, and utilise resources efficiently.

Chapter 5 of the NPPF (Delivering a sufficient supply of homes) encourages the delivery of housing to meet the needs of different groups, including those with specific housing requirements such as religious communities. Local authorities are urged to plan for a mix of housing types, including affordable and specialised accommodation.

Paragraph 96 of the NPPF supports the creation of healthy, inclusive, and safe communities. Residential accommodations for monks could contribute to this objective by providing a supportive environment for community engagement and spiritual well-being.

Chapter 13 of the NPPF (Protecting Green Belt land) asserts that if the proposed development is within or near green belt land, policies regarding the protection of green spaces and restrictions on development may apply. However, certain exceptions may be allowed.

Chapter 16 of the NPPF (Conserving and enhancing the historic environment) confirms that if the proposed development involves a historic site or heritage building, policies relating to conservation and heritage preservation (e.g., preserving the character of the area, protecting heritage assets) will be relevant.

Hertsmere Local Plan

The site is within the Hertsmere Borough Council boundary. The Hertsmere Local Plan (2012-2027) is made up of four parts:

1. Core Strategy (adopted January 2013);
2. Elstree Way Corridor Area Action Plan (adopted July 2015);
3. Site Allocations and Development Management (SADM) Policies Plan (adopted November 2016); and
4. Policies Map (adopted November 2016).

The Elstree Way Corridor Area Action Plan is not relevant for this proposal as the site is not located within the designated area.

The other three documents which are part of the Hertsmere Local Plan are discussed below.

Core Strategy

The Core Strategy was adopted in January 2013. The document sets out the Council's vision for development in Hertsmere until 2027, addressing national and regional policy requirements, as well as community needs. The following policies are relevant for the proposed development:

- Policy SP1 Creating Sustainable Development
- Policy SP2 Presumption in Favour of Sustainable Development
- Policy CS13 The Green Belt
- Policy CS14 Protection or Enhancement of Heritage Assets
- Policy CS19 Key Community Facilities
- Policy CS22 Securing a High Quality and Accessible Environment
- Policy CS24 Development and Accessibility to Services and Employment
- Policy CS25 Accessibility and Parking
- Policy CS26 Promoting Alternatives to the Car

Site Allocations and Development Management Policies Plan

The Site Allocations and Development Management Policies Plan was adopted in November 2016. The document has two main purposes:

- a) To provide environmental and other criteria, against which all development proposals and planning applications can be judged; and
- b) To define sites and areas:
 - To provide environmental and other criteria, against which all development proposals and planning applications can be judged;
 - To define sites and areas. These are shown on a policies map and include the Green Belt, towns and villages, town centres, employment areas, housing sites and open spaces. For site proposals (e.g. housing sites), the plan lists specific planning criteria or constraints to which development proposals should adhere; and
 - To deliver the policies set out in the Hertsmere Core Strategy 2013.

The following policies are relevant for the proposed development:

- Policy SADM3 Residential Developments
- Policy SADM22 Green Belt Boundary
- Policy SADM26 Development Standards in the Green Belt
- Policy SADM29 Heritage Assets
- Policy SADM30 Design Principles
- Policy SADM32 Key Community Facilities
- Policy SADM33 Provision for Faith Communities
- Policy SADM38 The Road Hierarchy
- Policy SADM40 Highway and Access Criteria for New Development

Policies Map

The Policies Map relates to the spatial policies in the Local Plan 2012-2027. According to Policy Map F (Letchmore Heath and Aldenham Park) for the Local Plan and shows that the application site is subject to the following designations:

- Within the Green Belt
- Within Letchmore Heath Conservation Area
- Within Mineral Consultation Area

Supplementary Planning Documents (SPDs)

Bhaktivedanta Manor Planning Brief SPD

The Bhaktivedanta Manor planning brief SPD was prepared by the Council in consultation with the International Society for Krishna Consciousness (ISKCON) Limited to provide a clear plan for the future development of Bhaktivedanta Manor.

Parking Standards SPD

The Parking Standards SPD sets out the Council's off-street parking guidelines for new developments.

Planning and Design Guide SPD

The Planning and Design Guide aims to promote higher standards of design and layout in Hertsmere by setting out the key principles that are expected to be applied to new development in the Borough.

Draft Sustainable Transport and Parking Standards SPD

The Draft Sustainable Transport and Parking Standards SPD was approved as interim guidance in the determination of planning applications on or after 15 September 2022. The purpose of the document is to set appropriate off-street car and cycle parking standards for different types of development within the borough.

Planning Issues

Principle of Development

Use of Site as Guest Accommodation

Paragraph 96 of the NPPF supports the creation of healthy, inclusive, and safe communities.

Policy CS19 (Key Community Facilities) of the Core Strategy states that proposals for the provision or dual use of key community facilities will be supported subject to any environmental constraints and other relevant policies.

Policy SADM32 (Key Community Facilities) of the SADM stipulates that proposals for the provision or enhancement of community facilities will be permitted provided:

- i. They will principally serve a local community or meet a wider, unmet need which cannot be accommodated elsewhere;
- ii. They are appropriately located and designed having regard to other plan policies, and the amenity of adjoining occupiers and the local area;
- iii. They are or can be made accessible by public transport, walking and cycling;
- iv. Where appropriate, they are designed to be able to accommodate a range of community uses and users; and
- v. They satisfy the terms of Policy CS25 and provide for an appropriate amount of car parking in line with the Parking Standards SPD.

As acknowledged in the SADM, the physical requirements and different roles that facilities perform are likely to vary between faith communities; the needs may also change over time as congregations increase or contract. The Council states that they wish to ensure that the needs of different types of faith community are adequately considered.

Policy SADM33 (Provision for Faith Communities) of the SADM states that the provision or enhancement of facilities in which faith communities can meet and worship will be permitted in accordance with Policy SADM32. Wherever possible, this accommodation should be designed to provide flexibility for existing and future needs.

The Faith Community Needs Assessment (2012) associated with SADM has been reviewed. There are no updated versions online. The document states that the Council acknowledges that the Temple is one of the largest faith communities in the Borough. However, the Bhaktivedanta Manor Planning Brief SPD provides more details regarding the needs of the Temple. The section explaining the purpose of the brief explains that the Temple has been experiencing cramped conditions at the main site, Bhaktivedanta Manor.

Both the NPPF and local plan policies including the Bhaktivedanta Manor Planning Brief SPD are supportive of religious faith communities and acknowledge the significance of the community to the local area. Paragraphs 96 and 97 of the NPPF are of significance since the development contributes to providing a supportive environment for community engagement, social interaction and spiritual well-being.

In reference to Policy SADM32 of the SADM in particular, the proposal is compliant, as:

- The Bhaktivedanta Manor Planning Brief SPD explains the site is subject to cramped conditions. Reusing a property near the site will support addressing the unmet need for guest accommodation at the main Temple site. Providing more accommodation at the Temple will result in impacts to the Green Belt, listed building, and the Conservation Area.
- The existing building has not changed in terms of elevations and site layout, therefore there will be no changes to design and appearance or neighbouring residential amenity.
- The site is within close proximity to the Temple and guests can walk to the Temple site or car share, if necessary. Due to the limited parking on site, guests are encouraged to park their vehicles at the Temple site.

Therefore, the above demonstrates that the Council seeks to support faith communities. The proposal also supports Policy SADM32 of the SADM.

In terms of guest stay, the periods can vary from a few days to a week, with a week being the maximum. The Temple offers temporary lodgings for prospective monks, or visitors on philosophical visits or meditation weekends. All stays are very low-key, and guests are reminded to respect their surroundings and the overall ethos of Temple life.

Furthermore, the use of the site as guest accommodation in association with the Temple has not resulted in adverse impacts in terms of traffic levels. Once guests have arrived, they are encouraged to walk from the guest house to the Temple. Unless guests need to use a vehicle to get to the Temple, those who can walk park their vehicles at the main Temple site. No additional parking at the site was required.

No noise issues have been raised by local residents, and as noted the guests predominantly use the property to sleep. Instead, the use of the site as guest accommodation in association with the Temple provides a tranquil environment, fostering a sense of serenity and mindfulness within the community.

Loss of Residential Dwelling

Policy SADM3 (Residential Developments) of the SADM states that proposals which would result in the net loss of satisfactory residential units or accommodation will not be permitted. Also, whilst not precisely relevant, the policy states that where planning permission is required, the conversion of existing homes, offices or other buildings, to smaller self-contained units or houses or buildings in multiple occupation will be refused planning permission if:

- There would be insufficient off-street parking provision and the potential effect on the adjoining highway would be unsatisfactory;
- The size of garden space would be inadequate or access to it would be difficult;
- There would be inadequate provision for the storage and collection of waste; or
- There would be more than 1 in 5 conversions in a defined row of houses.

Whilst the proposal does not entail the conversion of an existing dwelling to self-contained units or a HMO, the above policy has been assessed.

The parking capacity is sufficient for the proposed use. The site is within a three-minute walking distance of the Temple pedestrian entrance, and guests are encouraged to walk to the Temple site. Where this is not possible, guests can use their vehicle to travel to the site or car-share. Those who can do so, are encouraged to leave their vehicles at the main Temple site where there is sufficient parking. Therefore, there is no requirement for a 1:1 parking ratio and parking demand will not increase.

The property provides sufficient garden space, and it is easily accessible for all guests that reside on-site. However, the property is used for sleeping purposes predominantly, as the guests spend most of their time at the Temple.

Since food preparation primarily takes place centrally at the Temple, the waste storage for the property is sufficient, with no significant increase of waste created on-site. No change to the collection has occurred, and it is not required. The site has been used as guest accommodation for over 8 years, and no issues have arisen during their time residing at the Property.

The neighbouring properties are not subject to change of use and will remain as existing.

Therefore, the proposal is compliant with Policy SADM3 of the SADM, meeting the requirements provided.

The application is the most appropriate location to accommodate the Temple's growing needs to provide guest accommodation. It will utilise an existing building, therefore not resulting in any adverse impacts to the Green Belt and Conservation Area, or Temple itself, therefore not impacting the heritage asset.

In line with the NPPF, the social, environmental and economic benefits of the proposed development are listed below.

Economic

- The Temple provides many economic benefits to the community. The provision of guest accommodation allows the Temple to contribute to the local economy, and that of the wider area.

Social

- The proposed development is merely the change of use of the property, so therefore no adverse impacts will occur to the street scene and Conservation Area.
- No adverse impacts arise in terms of the impact on neighbouring amenity.
- As no internal and external changes have occurred, the property can revert back to a residential dwelling should the current use cease. This represents true flexibility.
- Local residents and those associated with the Temple co-exist well within Letchmore Heath.

Environmental

- The use of the site as guest house accommodation does not cause any ecology, heritage and arboricultural issues, not affect any other environmental matter.

Heritage Matters

The site is located within Letchmore Heath Conservation Area, which was designated in October 1969 and enlarged November 1978. The Council does not have a Character Appraisal/Assessment for this Conservation Area.

Policy CS14 (Protection or Enhancement of Heritage Assets) of the Core Strategy states that all development proposals must conserve or enhance the historic environment of the Borough in order to maintain and where possible improve local environmental quality.

Policy SAD29 (Heritage Assets) of the SADM asserts that in Conservation Areas the Council will seek to:

- Retain buildings, structures and historic features;
- Retain important open spaces and views;
- Avoid the cumulative effect of smaller scale proposals harming the area; and
- Obtain improvements which enhance the area.

No changes have taken place to the elevations, floor plans and hard and soft landscaping, and the use is not dissimilar to other properties within the Conservation Area. Therefore, there will be no adverse visual impact on the Conservation Area as the site will remain as existing, and the proposal is compliant with policies CS14 and SAD29 of the Local Plan.

Amenity

Policy SADM30 of the SADM requires development to have limited impact on the amenity of occupiers of the site, its neighbours, and its surroundings in terms of outlook, privacy, light, nuisance and pollution.

Those who will stay at the guest accommodation will mainly use the accommodation for sleeping purposes and most meals will be provided at the Temple.

No activities such as prayers or festivals will take place at the site; these will continue to be run at the main Temple. As such, there will be no increase in noise levels or other activity taking place at the site. Neighbour amenity will be unaffected.

Vehicular movements will be minimal, likely similar to those of a domestic property; hence noise and disturbance will not cause harm.

As the property is an existing building, and no changes are proposed, there are no adverse impacts in terms of privacy and overlooking.

The proposed development will not cause any adverse impacts on neighbouring residents, and therefore will comply with Policy SADM30 of the Site Allocations and Development Management Policies Plan.

Collaboration with Local Residents

The guest house accommodation in association with the Temple co-exists with the residents within Letchmore Heath, and no issues between the uses have arisen. The local residents are generally supportive of the Temple and have encouraged the Applicant to seek planning permission from the Council to regularise matters for this site. Informal consultations have occurred between the Temple and residents, which have reaffirmed that the residents are content with the existing situation.



The proposal provides many benefits, socially, environmentally and economically, providing guest house accommodation in association with the Temple, close to the main site. No adverse impacts will result, including to the local ecology, street scene, Conservation Area and Green Belt. The proposal will remove strain on the listed building at the main Temple site.

In summary, whilst the site has been intensified due to the change of use from residential to guest house accommodation, a thoughtful and respectful adaption has occurred which respects the Property and neighbouring residents.

Therefore, the principle of development is acceptable, and the proposal should be supported.

Should you have any queries regarding the above or any other matter relating to this application, please contact me on neve@jmsplanning.com or 07568 115449.

Yours faithfully

N. Thomson

Neve Thomson
JMS Planning & Development

Encs