

# Planning Statement

293-299, 301-305 Kentish Town Road  
London  
NW5 2TJ

Create Reit Commercial Ltd

September 2024

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# 1 Introduction

- 1.1 This Planning Statement has been prepared by Newsteer Real Estate Advisers (hereinafter 'the Agent') on behalf of Create Reit Commercial Ltd (hereinafter 'the Applicant') in support of a full planning application for change of use at 293-299, 301-305 Kentish Town Road, NW5 2TJ (hereinafter 'the Site').
- 1.2 The proposals – in support of which this Planning Statement has been prepared – seek a change of use to the upper floors of the Site from an office (Class E) to a 74no. bedroom hotel (Class C1), as well as cycle and waste storage (hereinafter 'the Proposed Development').
- 1.3 The description of development for which full planning permission is sought is as follows:
- “Change of use of offices on upper floors to create a 74no. bed hotel within the existing building envelope.”*

## Supporting Documents

- 1.4 In addition to this Planning Statement, this full planning application is accompanied by a number of supporting documents. The scope of these documents has been discussed and agreed through pre-application discussion with the London Borough of Camden (hereinafter 'the Council').
- 1.5 The supporting documents include the following:
- Covering Letter;
  - Application Form;
  - Design and Access Statement (prepared by Latitude Architects);
  - Delivery and Servicing Plan (prepared by Caneparo Associates);
  - Draft Construction Management Plan (prepared by Caneparo Associates)
  - Energy Statement – including Sustainability Statement (prepared by Consult JA Ltd)
  - Fire Statement (prepared by Vemco)
  - Hotel Management Plan (prepared by Caneparo Associates)
  - Marketing Report (prepared by BBG Real Estate)
  - Planning Statement (this document) (prepared by Newsteer)
  - Transportation Assessment – including Travel Plan and Waste Collection Strategy (prepared by Caneparo Associates)
- 1.6 In addition to the above supporting reports, a full set of architectural plans prepared by Latitude Architects are submitted alongside this application. Details of which are provided below
- 2305-LAT-XX-00-M2-A-P10002 – Site Location Plan
  - 2305-LAT-XX-00-DR-A-10100 – Existing Ground Floor Plan
  - 2305-LAT-XX-00-DR-A-10101 – Existing First Floor Plan
  - 2305-LAT-XX-00-DR-A-10102 – Existing Second Floor Plan
  - 2305-LAT-XX-00-DR-A-10103 – Existing Third Floor Plan

- 2305-LAT-XX-00-DR-A-10104 – Existing Roof Plan
- 2305-LAT-XX-00-DR-A-15105 – Proposed Site Plan
- 2305-LAT-XX-00-M2-A-10201 – Existing East Elevation
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- 2305-LAT-XX-00-DR-A-15100 – Proposed Ground Floor Plan
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- 2305-LAT-XX-00-M2-A-15301 – Proposed Section East-West AA
- 2305-LAT-XX-00-M2-A-15302 – Proposed Section East-West BB
- 2305-LAT-XX-00-M2-A-15303 – Proposed Section North-South CC
- 2305-LAT-XX-00-M2-A-15304 – Proposed Section North-South DD

## Structure of this Statement

1.7 The remainder of this statement is set out in the following sections:

- Section 2 – Site Description and Context
- Section 3 – Proposed Development
- Section 4 – Pre-application Engagement
- Section 5 – Planning Policy Context
- Section 6 – Planning Considerations
- Section 7 – Planning Balance; and,
- Section 8 – Summary and Conclusions

## 2 Site and Site Context

### Site Description and Context

2.1 The Site currently comprises two originally separate buildings which are now conjoined. The buildings are set out as offices, which are currently vacant. Number 293-299 sits on the corner of Kentish Town Road and Holmes Road while number 301-305 wraps around with frontages on both roads

2.2 The Site fronts Kentish Town Road to the east with Holmes Road to the south. To the north of the Site are Georgian style terraced buildings ranging in height from 4-6 storeys with ground floor town centre uses. To the east of the Site, across Kentish



**Figure 1:** Aerial Photograph of Site

is a four storey ornate Victorian terrace and a four storey building with a more modern appearance all with ground floor commercial uses. To the south of the Site, across Holmes Road, is a Victorian public house of three storeys with a three storey terrace of mixed character further south, all with commercial uses at ground floor level. To the west of the Site is the Grade II listed Kentish Town Police Station with associated car park and seven/eight storey post war building.

2.3 Kentish Town Road has a commercial character with a wide variety of uses at ground floor level with upper levels consisting of commercial and residential uses. The variety of uses give a vibrant feel to Kentish Town Road while Holmes Road is more residential in nature interspersed with commercial, educational and industrial uses.

2.4 The Site is in a very sustainable location, benefitting from PTAL 6a, with Kentish Town Station located just 120m to the north. The northern line at Kentish Town Station is currently closed until the end of 2024 for works to replace the escalators, while the national rail station remains open. There is also the London Overground station, Kentish Town West, located approximately 500m to the southwest of the Site. There are also numerous bus stops along Kentish Town Road.

2.5 There are two Grade II listed buildings in close proximity to the Site - Kentish Town Police Station to the rear of the site and 281 Kentish Town Road approximately 35m to the south. The Site is not located within a Conservation Area. The Bartholomew Estate Conservation Area is located approximately 150m to the east of the Site and the Inkerman Conservation Area is located approximately 120m to the south west of the Site.

2.6 The Site is located within flood zone 1, which has the lowest probability of flooding.

2.7 Having reviewed the Council's Policies Map, the following has been identified in relation to the Site:

- Within Kentish Town Centre;
- Within Kentish Town Neighbourhood Plan;
- Within an Archaeological Priority Area;
- Adjacent to Site Allocation (40: Kentish Town Police Station, 10A, 12A 14 Holmes Road/draft site allocation KT4);

## Planning History

- 2.8 A search of the Council's Planning Portal revealed the following applications relevant to the Site.

### *293-299 Kentish Town Road – Rooms 1-5 Second Floor*

- **401904** – Change of use from office (Class B1) on part of 2nd floor to a residential flat (Class C3) within the meaning of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing nos. A1 A2 A3 amended and as revised by letter dated 14th March 1995– **Approved 08/12/1994**

- 2.9 This is a historic application and there are no application documents available online to determine whether it was implemented but the approval of an element of residential use and loss of office is noted.

### *293-299 Kentish Town Road*

- **8500404** – The change of use of the first floor from offices to restaurant and take-away with ancillary staff storage and office facilities. ^As shown in drawing 9172.– **Approved 08/03/1985**

### *301-305 Kentish Town Road*

- **2008/2151/P** – Change of use of ground floor unit facing Holmes Road from ancillary reception/storage use (Class B1) to a retail shop (Class A1).– **Approved 11/08/2008**
- **8500249** – Use of the 1st and 2nd floors from retail to a snooker club as shown on drawing nos. K TR 1P 2E P.– **Approved 04/04/1985**
- **8400566** – The change of use of the first and second floors from retail to snooker club.– **Withdrawn 27/03/84**
- **36041** – Change of use of the first floor and rear ground floor from stock room and retail shop to offices in connection with the retail shop.– **Refused 06/04/1983 –appeal also dismissed**

- 2.10 There are also advertisement applications associated with the ground floor units which are not considered relevant to this pre-application.

- 2.11 The planning history demonstrates that a change of use of the building has been accepted several times, including away from office use on the upper floors which is notably the subject of this pre-application request.

### 3 The Proposed Development

- 3.1 The description of development for which full planning permission is sought is as follows:

*““Change of use of offices on upper floors to create a 74no. bed hotel within the existing building envelope.”*

- 3.2 The proposal is to convert the existing office accommodation at upper floors into hotel use whilst retaining the existing retail tenancies at ground and first floors in 293-299 Kentish Town Road and ground floor in 301-305 Kentish Town Road.
- 3.3 For the proposed development, there are no external changes to be made to the existing buildings other than new rooflights and building efficiency is optimised by the inclusion of micro-hotel style rooms similar to the Premier Inn Hub concept.
- 3.4 The main entrance to the hotel is from Holmes Road into a reception where the existing lift takes users to first floor level. Guests for the second and third floors would then navigate to the lift in numbers 293-299 Kentish Town Road for vertical circulation to the upper levels. All existing stair-cases are retained.
- 3.5 Existing cycle storage locations for 7no. cycles are retained and 2no. 1100L waste storage Eurobins are located within the existing secure service yard.
- 3.6 Full details of the proposed development are provided within the plans and Design and Access Statement submitted in support of this application.



## 4 Pre-application Engagement

- 4.1 Paragraph 39 of the NPPF (2023) recognises that good quality early pre-application engagement enables better coordination between public and private resources which often improves outcomes for the community. Cognisant of this, the Applicant proactively sought to engage with the Council throughout the pre-application process. Aligned with this approach, paragraph 41 of the NPPF encourages local authorities to take an early, proactive approach, and provide advice in a timely manner.
- 4.2 An online meeting was held with the Council on the 13<sup>th</sup> of March 2024. This meeting was further bolstered by a formal written response (attached in **Appendix A** - Ref: 2024/0392/PRE) and ongoing email exchanges.
- 4.3 The key points from the meeting (Ref: 2024/0392/PRE) relating to the change of use to a hotel are summarised below: -
- Officers confirmed that the marketing report demonstrated that the Site is no longer viable for the existing office use and the change of use was deemed acceptable in principle.
  - The proposed use of the Site as a hotel was deemed acceptable.
  - The proposed rooflights were deemed acceptable.
  - Further detail relating to the rear elevation at second floor level is required for the full application.
  - Further information will be required regarding servicing/delivery uses, waste storage/collection strategy, hotel management plan and details on passenger pick-up/drop-off for the full application.
  - The Council encourages exploring ways of making sensitive energy efficiency improvements to the existing buildings and optimising resource efficiency.
  - A full Transport Assessment should be submitted with the application, including trip generation analysis and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance.
  - Further detail on cycle access and cycle parking should be provided at application stage.
  - A suitable location on Holmes Road should be considered for the proposed disabled parking space.
  - A planning obligation will be used to ensure that no coach party bookings will be accepted and there will be a ban on customers being picked up or dropped off by coach at any time directly outside the hotel.
  - A draft Construction Management Plan (CMP) using the Council's CMP pro-forma should be submitted with the application.
  - As there are planned segregated cycle lanes on Kentish Town Road, servicing from this location may not be possible and alternative arrangements from Holmes Road should be explored.
  - A full Delivery and Servicing Plan shall be provided with any future application.
  - The response also set out the planning obligations and their associated costs for the proposed development.

4.4 In response to the comments, further documentation and information have been included with this submission as follows:

- Full details of the rear elevation at second floor level have been provided.
- A Hotel Management Plan has been submitted with the application.
- A Transport Assessment, including a trip generation analysis and Active Travel Zone Assessment has been submitted with the application.
- Details of the cycle parking locations are included with the application.
- A Blue Badge bay will be provided on Holmes Road, within 50m of the main entrance. This would either be on the single yellow line on the southern side of the carriageway, or through replacing one of the existing parking bays on the northern side.
- A draft Construction Management Plan has been submitted with the application using the Council's pro-forma.
- Holmes Road will be the primary location for servicing as requested.
- A Delivery and Servicing Plan has been submitted with the application

## 5 Planning Policy

- 5.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permissions shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, the Council's Development Plan comprises:
- Camden Local Plan (2017)
  - Local Plan Policies Map (2021 update)
  - London Plan (2021)
  - Kentish Town Neighbourhood Plan (2016)
- 5.2 The National Planning Policy Framework 'NPPF' (2023) and National Planning Practice Guidance 'NPPG' are also considered to be material considerations.
- 5.3 The Council consulted on the draft new Local Plan from 17 January to 13 March 2024. The responses received are being considered and the Council aim to publish an updated version of the Local Plan for further consultation later in 2024. The Draft Camden Local Plan is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

### Camden Local Plan 2017

- 5.4 **Policy A1** 'Managing the impact of development' seeks to protect the amenity of Camden's residents by ensuring that the impact of development is fully considered and does not harm the amenity of neighbouring residents. This includes light, privacy, outlook and transport impacts.
- 5.5 **Policy A4** 'Noise and vibration' states that The Council will seek to ensure that noise and vibration is controlled and managed.
- 5.6 **Policy D1** 'Design' requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area.
- 5.7 **Policy C6** 'Access for all' states that the Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.
- 5.8 **Policy E1** 'Economic development' aims to secure a successful and inclusive economy in Camden by supporting employment generating uses, including leisure and tourism.
- 5.9 **Policy E2** 'Employment premises and sites' seeks to protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ), or the local economy. Where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use.

- 5.10 **Policy E3** 'Tourism' recognises the importance of the visitor economy in Camden and expects new, smaller-scale visitor accommodation in town centres such as Kentish Town.
- 5.11 **Policy CC1** 'Climate change mitigation' requires all developments to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards.
- 5.12 **Policy CC2** 'Adapting to climate change' states that all development should adopt appropriate climate change adaptation measures.
- 5.13 **Policy CC5** 'Waste' states that all developments should include facilities for the storage and collection of waste and recycling.
- 5.14 **Policy TC2** 'Camden's centres and other shopping areas' seeks to promote and ensure successful and vibrant centres throughout the borough to serve the needs of residents, workers, and visitors.
- 5.15 **Policy TC4** 'Town centre uses' seeks to ensure that the development of shopping, services, food, drink, entertainment, and other town centre uses does not cause harm to the character, function, vitality, and viability of a centre, the local area, or the amenity of neighbours.
- 5.16 **Policy T1** 'Prioritising walking, cycling and public transport' requires developments to promote sustainable transport by prioritising walking, cycling, and public transport through methods such as improving the pedestrian environment and creating a safe and accessible environment for cyclists
- 5.17 **Policy T2** 'Parking and car-free development' seeks to limit the availability of parking and requires all new developments to be car-free.
- 5.18 **Policy T3** 'Transport infrastructure' aims to protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport.
- 5.19 **Policy T4** 'Sustainable movement of goods and materials' aims to promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road.

### The London Plan (2021)

- 5.20 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework of how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Plan is the statutory development for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. The following policies are of relevance to the application:
- 5.21 **Policy SD6** 'Town centres and high streets' states that the vitality and viability of London's varied town centres should be promoted and enhanced.

- 5.22 **Policy D4** 'Delivering good design' sets out the requirement for development to deliver high quality design and place-making and that design quality should be retained through to completion.
- 5.23 **Policy D5** 'Inclusive design' requires proposals to achieve high standards of accessible and inclusive design by providing high quality people focused spaces which are designed to facilitate social interaction and inclusion and be convenient and welcoming for all.
- 5.24 **Policy D12** 'Fire Safety' states that to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
- 5.25 **Policy E1** 'Offices' states that the redevelopment, intensification and change of use of surplus office space to other uses including housing is supported subject to taking into account the need for lower cost and affordable workspace, and the exploration of surplus large office space as smaller office units.
- 5.26 **Policy E10** 'Visitor infrastructure' states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure.
- 5.27 **Policy SI 1** 'Improving air quality' states that development should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, or create unacceptable risk of high levels of exposure to poor air quality.
- 5.28 **Policy SI 2** 'Minimising greenhouse gas emissions' outlines that all Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies.
- 5.29 **Policy T3** 'Transport capacity, connectivity and safeguarding' states that Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs.
- 5.30 **Policy T5** 'Cycling' requires proposals to secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.
- 5.31 **Policy T6** 'Car parking' Part D states that the maximum car parking standards as set out in Policy T6.1 should be applied to development proposals and used to set the local standards within Development Plans. Part E requires appropriate disabled persons parking for Blue Badge holders is provided. Part F states that provision is made for infrastructure for electric or other ultra-low emission vehicles. Part I notes that adequate provision should be made for efficient deliveries and servicing and emergency access.

- 5.32 **Policy T6.4** 'Hotel and leisure uses parking' states that in the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.
- 5.33 **Policy T6.5** 'Non-residential disabled persons parking' states that disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.
- 5.34 **Policy T7** 'Deliveries, servicing and construction' Part G states that Development proposals should facilitate safe, clean, and efficient deliveries and servicing.

### National Planning Policy Framework (NPPF) (2023)

- 5.35 The National Planning Policy Framework (NPPF) was updated in December 2023, setting out the overarching planning guidance to which all Development Plan Documents should comply. As such, the NPPF is a material consideration of considerable weight. Guidance as to how the NPPF, Planning Policy and Planning Law should be used in practice is provided within the National Planning Practice Guidance (NPPG).
- 5.36 The presumption in favour of sustainable development lies at the heart of the NPPF. For decision taking, Paragraph 11 sets out that, this means expediently approving development proposals that accord with an up-to-date development plan without delay or, where there are no relevant policies or those policies are out of date, permission be granted unless the application of policies within the Framework which protect assets of importance provide a clear reason for refusing development, or any adverse impacts of approving the proposal would significantly and demonstrably outweigh the benefits.
- 5.37 Supporting the Government's objective to increase the supply of housing, a sufficient amount and variety of land must come forward where it is needed allowing for land with permission to be developed without delay (paragraph. 60).

### National Planning Policy Guidance (NPPG)

- 5.38 The NPPG was published by the Government in March 2014 to provide more detailed guidance to support the policies set out in the NPPF (2012). It was partially updated after the publication of the NPPF 2021. The document forms part of the Government's wider strategy of making the planning system more efficient and effective and follows a review of planning policy guidance. The guidance is published as a web-based resource and in 2014 was accompanied by a Written Ministerial Statement by Nick Boles which explained how it replaces or cancels over 150 previous documents. The NPPG includes guidance on 41 categories including health and wellbeing, local plans, design, and the planning application process.

The NPPG highlights that good design is an integral part of sustainable development. New proposals should reflect this requirement for good design (as set out in national, regional and local policy) while local planning authorities are advised to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area.

The guidance further outlines that good design seeks to create places, buildings and spaces which work well for everyone and, most importantly, adapt to the needs of future generations

## 6 Planning Considerations

6.1 The key planning considerations in the determination of this planning application will be set out under the respective headings below.

- The Principle of Development
- Loss of Existing Use
- Principle of Hotel Use
- Design
- Hotel Management
- Energy and Sustainability
- Transport Matters
- Fire

### The Principle of Development

6.2 At the heart of the NPPF is the presumption in favour of sustainable development (Paragraph 11), which states that permission should be granted without delay, where proposals accord with the Development Plan.

6.3 The Site benefits from an excellent PTAL rating of 6a and is located in close proximity to Kentish Town station, which is served by national rail and the northern line. There is also the London Overground station, Kentish Town West, located approximately 500m to the south west of the Site. In addition, there a number of bus routes serving Kentish Town Road.

6.4 The Site is in a sustainable location wherein the principle of development is acceptable subject to use, design, highway and amenity policies of the development plan.

### Loss of Existing Use

6.5 The proposal is to convert the existing vacant office accommodation (Class E) into hotel use whilst retaining the existing retail tenancies at ground and first floors in 293-299 Kentish Town Road and ground floor in 301-305 Kentish Town Road.

6.6 **Policy E2** 'Employment premises and sites' of the Camden Local Plan states that the development of business premises and sites for non-business use will be resisted unless it is demonstrated to the Council's satisfaction:

*a. the site or building is no longer suitable for its existing business use; and*

*b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.*

6.7 In order to justify the change of use a thorough marketing exercise, sustained over at least two years, must be submitted.



6.8 The Camden Planning Guidance (2021) on employment sites and business premises states that when assessing proposals that involve the loss of a business use, the Council will consider whether there is potential for that use to continue. They will take into account various factors including:

- *whether the premises are in a reasonable condition to allow the use to continue;*
- *the range of unit sizes it provides, particularly suitability for small businesses;*
- *the suitability of the location for any business use;*
- *how the business use is related to other neighbouring/nearby land uses;*
- *whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.*

6.9 Accordingly, a Marketing Report prepared by BBG Real Estate London dated June 2024 has been submitted in support of this application. The report outlines that marketing started in August 2021, meeting the two-year marketing requirement. The report also addresses the points listed above from the Camden Planning Guidance on employment sites and business premises as follows:

- The report establishes that the premises were refurbished in 2018 to make it attractive to tenants. Upgrades included replacement of M&E (Air conditioning and Lifts) with high quality fitout new kitchens, WCs, meeting rooms and break out areas in keeping with modern office occupiers requirements.
- The premises was marketed in a range of different sizes from 1,000sqft to a total of 14,877sqft;
- The report outlines that there has been few transactions in the local area and there is limited demand for office space with an increase in vacancy rates. The closure of Kentish Town tube Station is also highlighted as an issue which is contributed to a drop in demand.
- The report highlights that the existing office is in an isolated office location with limited opportunities for the agglomeration impacts a successful office area can have.
- *how the business use is related to other neighbouring/nearby land uses;*
- The replacement hotel has the potential to offer greater benefits to local businesses through an increase in trade.

6.10 The CPG on employment sites and business premises also outlines that the marketing exercise is expected to include the following:

- *Use of a reputable local or national agent with a track record of letting employment space in the borough;*
- *A visible letting board on the property (constant throughout the marketing period) (our emphasis);*
- *Marketing material should be published on the internet, including popular online property databases such as Focus and should include local or specialist channels where appropriate – e.g. jewellery-specific press in Hatton Garden, through Business Improvement Districts, the GLA's Open Workspace Group or other workspace providers;*

- Existing lawful use of the advertised premises should be included in the marketing materials;
- Continuous marketing over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed) to the date of the submission of the planning application;
- Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;
- Lease terms should be attractive to the market: – be for at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works – and/or include short term flexible leases for smaller premises which are appropriate for SMEs; – appropriate rent-free periods should be offered to cover necessary fit out or refurbishment costs.
- A commentary on the number and details of enquiries received, such as the number of viewings and the advertised rent at the time, including any details of why the interest was not pursued; and
- Where there is an existing employment use then we will require evidence that the tenant intends to move out.

6.11 The marketing report also addresses the above points listed from the Camden Planning Guidance on employment sites and business premises as demonstrated below:

- The marketing report is authored by BBG Real Estate Advisers who are a highly reputable agency with an established presence in Central London.
- Letting boards are prohibited by LBC within town centres, including Kentish Town Centre, where the Site is located.
- The Site was digitally advertised on major commercial property platforms, including the Agents Society, which is readily available to all Central London Agents, CoStar, Zoopla and Rightmove. Marketing information was also distributed to approximately 500no. commercial agents
- The existing lawful office use was included in the marketing materials.
- The report demonstrates that the marketing was initiated in August 2021 with Site details being circulated and this has continued into the present day.
- The report demonstrates that the average rents in Kentish Town were approximately £35 per sqft however given the high specification and standard of refurbishment, competing buildings were in the range of high £40s to low £50s per sqft. To be competitive, a quoting rent of sub £40 per sq ft would generate interest. The Site was advertised to the market flexible quoting terms at a rent of £39.50 per sq ft.
- Parties that have expressed interest in the property during this process were offered considerable discounts to the quoting terms for example Gem, the Environmental Building Services Co were interested in part of the available space and were offered terms at £37.50 with 18 months rent free and an early tenants break option however the building was not suitable for them.
- The marketing activities attracted 56no. interested parties with 9no. parties inspecting the Site and 2no. parties requesting terms. Of the two parties who requested terms, one party was an office user interested in part, the other was a local Nursery who would have required a change of use to occupy. Competitive terms were offered however neither party decided to proceed.

- During the marketing period, the Landlord continued discussions with the existing tenant to remain in occupation offering very competitive rental levels with an extensive rent free period. The tenant has subsequently moved to Euston which is a more accepted office location.

6.12 For the reasons set out above, it is demonstrated that the marketing exercise undertaken is in line with the requirements of **Policy E2** and the CPG on employment sites and business premises, and as such, the Site falls within the exceptional circumstances whereby the loss of employment floorspace may be accepted.

6.13 This is consistent with the pre-application response received from the Council which states, 'Officers can advise that the marketing evidence sufficiently demonstrates that the premises is not viable as office use (Class E) in the long term. The change of use is therefore considered to comply with requirements of policy E2 of the Local Plan and CPG Employment Sites & Business Premises.'

### Principle of Hotel Use

6.14 **Policy E10** 'Visitor Infrastructure' of the 2021 London Plan states that hotels and serviced accommodation should be promoted in town centres, such as Kentish Town Centre. Policy E10 also states that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041.

6.15 **Policy E3** 'Tourism' of the Camden Local Plan allows for smaller scale visitor accommodation in Kentish Town Centre, where the Site is located. The policy gives no definition of smaller-scale visitor accommodation, however, large scale visitor accommodation is directed towards central London.

6.16 Policy E3 further states that all tourism development and visitor accommodation must comply with the following points:

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

6.17 Each part of this policy concerning the Site is addressed in turn below.

- be easily reached by public transport;

6.18 The Site's sustainable location in proximity to Kentish Town Station and local bus stops results in an excellent PTAL rating of 6a the Site, demonstrating that the Site can be easily reached by public transport.

- provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;

- 6.19 Taxis will be able to stop on either Kentish Town Road or Holmes Road and therefore providing sufficient capacity to accommodate demand. Holmes Road benefits from a single yellow line approximately 20m from Kentish Town Road which can provide the space for the picking up and setting down of passengers. This space aligns with the proposal to have the main entrance to the hotel on Holmes Road.
- *not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems;*
- 6.20 The character of the area is that of a mix of uses, with residential, office, public houses, cafes and restaurants all within close proximity to the Site. It is considered that the proposed hotel use would contribute positively to the character of the area.
- *not lead to the loss of permanent residential accommodation.*
- 6.21 The Site has an existing office use and therefore will not lead to the loss of permanent residential accommodation.
- 6.22 It is therefore demonstrated that the Site is in a suitable location for a hotel use and aligns with the requirements of **Policy E3** of the Camden Local Plan.
- 6.23 This is consistent with the pre-application response received from the Council which states, 'Given the location of the proposed hotel on a town centre high street and its proximity to Kentish Town underground and National Rail station, the proposals are considered to comply with policy E3.'

## Design

- 6.24 The proposed development involves minimal intervention to the external envelope of the building. The main entrance to the hotel is located on the southern side of the Site with a frontage on Holmes Road, offering a quieter and more relaxed reception experience than would be the case if the entrance was on the busier Kentish Town Road.
- 6.25 The entrance has a level threshold and once inside, building users find themselves in a lobby which also gives convenient access to the lift to the upper levels. The existing lift extends down to street level to provide level access for wheelchair users.
- 6.26 The reception desk will be directly ahead on entry, highly visible and will be designed to give accessible ease of use for all hotel users.
- 6.27 The hotel entrance features a staircase and a passenger lift to access the first floor of the 301-305 building. Given the existing level differences, ramped access will be provided between the two buildings at their connection point. However, due to existing constraints, ramped access is not feasible at the second-floor level. Consequently, accessible rooms have been strategically placed only in areas where disabled access is achievable.
- 6.28 The hotel rooms are accessed at each floor level via 1.2m wide corridors with room entrance doors located to either side. The entrances to all hotel rooms will be clearly illuminated and meet effective clear widths consistent with best practice.

- 6.29 16no. of the total 74no. bedrooms are sized and configured as accessible rooms with appropriately sized ensuite bathrooms.
- 6.30 The proposed development therefore complies with **Policies D1** of the Local Plan and **D4** and **D5** of the London Plan.

### Hotel Management

- 6.31 A Draft Hotel Operational Management Plan has been prepared by Caneparo Associates in support of the application.
- 6.32 The Draft Management Plan outlines that It is expected that there will be around 3 – 5 members of staff on-site at any one time during the day (07:00 - 19:00) and around 2 – 4 members of staff on-site during nighttime hours (19:00 – 07:00). Staff will be encouraged to travel to the hotel by sustainable modes, particularly walking and cycling if a viable option.
- 6.33 Staff will be advised against smoking in the immediate vicinity of the hotel and/or in any areas frequented by guests and will be asked to maintain consideration for neighbours at all times, particularly during the night time hours when noise should also be kept to a minimum.
- 6.34 The Draft Management Plan outlines that guests will be advised upon booking to not travel by car as due to the Controlled Parking Zone (CPZ) restrictions, guests will not be able to park locally and will therefore have to use sustainable modes of travel. The hotel will advocate itself as a destination unsuitable for coach parties. This is partly due to the nature of the hotel and its operations, but also the lack of any dedicated coach parking facilities. Hotel staff will be made aware of the hotel's policies on coach travel, which is to not accept group bookings travelling by coach.
- 6.35 The Draft Management Plan outlines that a security presence will be maintained on-site 24/7 and provided by both staff and CCTV. Guests will be reminded of the need to behave considerately at all times, particularly late at night or in the early morning. Guests will be reminded that there are residential uses in close proximity of the Site.
- 6.36 The vision for the hotel is to principally accommodate people travelling to events/meetings and for leisure and tourism purposes. It is not expected that the hotel will attract anyone likely to be carrying out antisocial behaviour – it will not be budget nor orientated by groups. Notwithstanding, there will be zero tolerance to any anti-social behaviour.
- 6.37 The information provided demonstrates that the hotel will be managed efficiently to ensure that the proposal is a positive for the local area and economy.
- 6.38 The proposed development therefore complies with **Policy A1** of the Camden Local Plan.

### Energy and Sustainability

- 6.39 An Energy and Sustainability Statement has been prepared by Consult JA Ltd in support of the application.

- 6.40 The retrofit project is inherently sustainable, with minimal alterations to the existing structure, cladding, and brick elevations, preserving the building's fabric while enhancing its functionality. The building envelope's passive thermal performance will be significantly improved by adding internal thermal insulation to the external walls and ensuring airtight construction, thereby minimizing energy loss.
- 6.41 The report outlines that the London Plan approach of "Be lean" – "Be clean" – "Be green" is fully adopted in the development. The proposal will implement high-efficiency services including high-efficiency ventilation with heat recovery and high-efficiency lighting. The proposal will also utilise the existing air source heat pumps for space heating while introducing solar PV panels.
- 6.42 The report demonstrates that the proposed development will achieve 35% overall regulated CO2 reduction against 2021 Part L notional baseline, 13% regulated CO2 reduction by renewable sources and 22% regulated CO2 reduction by efficiency measures.
- 6.43 The proposed development therefore complies with **Policies CC1 1** and **CC2** of the Southwark Local Plan and **Policy SI2** of the London Plan.

### Transport Matters

- 6.44 A Transport Assessment, and a Delivery, Servicing and Waste Management Plan have been prepared by Caneparo Associates in support of the application. A Draft Construction Management Plan has also been prepared by Caneparo Associates.
- 6.45 The transport information outlines that the Site is located in an area of excellent accessibility by non-car modes of transport, being within convenient walking distance of a number of rail & underground stations and many bus services, this is evidenced by the site's PTAL rating of 6a.
- 6.46 The proposals will be car-free which reflects the Site's excellent accessibility by walking, cycling and public transport. A Blue Badge bay will be provided on Holmes Road with the Applicant willing to provide the necessary contribution to ensure that this is delivered. This will be within 50m of the main entrance to the site.
- 6.47 Day time and night time active travel audits were undertaken according to the Healthy Streets ATA to assess the routes to key amenities / facilities. This provided recommendations in order to improve these routes, albeit none are a necessity due to the limited impact created by the proposed development.
- 6.48 Both long-stay and short-stay cycle parking will be provided in accordance with London Plan standards. All cycle parking spaces are provided within sheltered and secure storage at ground floor level. The staff parking will be accessed via a separate entrance via keycode access, whereas on-site staff will assist with visitors parking their bicycles.
- 6.49 Servicing activity will predominantly take place from the single yellow line on Holmes Road, however, should vehicles arrive during the current restrictions (8.00am-10.00am & 2.00pm-4.00pm Monday to Friday during school term time) they will utilise the double yellow line

adjacent to the site on Kentish Town Road, in-line with existing arrangements. The proposals are anticipated to generate circa 1-2 deliveries a day, therefore when compared to the existing office, there will be a net reduction in deliveries and therefore providing additional servicing capacity to the adjacent roads.

- 6.50 Waste will be collected from Holmes Road with waste collection operatives accessing the waste store directly from the carriageway, therefore bin dragging distances are within 10m.
- 6.51 A multi-modal trip generation assessment has been undertaken to consider how the conversion from office floorspace to hotel rooms will affect the number of trips and the method of reaching the Site. The assessment undertaken demonstrates that the proposed development will generate a negligible increase in trips during the weekday peak periods when compared to the existing office, and therefore there will be no impact on the local highway and public transport network.
- 6.52 An Outline Construction Management Plan using Camden's pro forma has been submitted which demonstrates that the impact of the proposed construction on the surrounding community, both for the construction on site and the transport arrangements for servicing the site will be minimised. This is a live document whereby different stages will be completed and submitted for the application as the development progresses.
- 6.53 The proposed development therefore complies with **Policies T1, T3, T5, T6 and T7** of the London Plan and **A1, T1, T2, T3 and T4** of the Camden Local Plan.

#### Fire

- 6.54 A Fire Statement prepared by Vemco has been submitted in support of this application. The Fire Safety Strategy outlines that the application complies with Parts A and B of London Plan **Policy D12**.
- 6.55 The Statement identifies that a fire appliance can be positioned in front of the building on Kentish Town Road or Holmes Road and identifies an evacuation assembly point on Kentish Town Road.
- 6.56 The Statement outlines that the premises will be designed to incorporate features which reduce the risk to life in a fire. These features include an alarm throughout the building if fire is detected, manual firefighting equipment in certain areas of the building and 60 minute fire resistance of elements in the building.
- 6.57 The Statement recommends that further investigation be carried out into the state of the external walls.
- 6.58 The Statement confirms that the travel distances within all hotel bedrooms, corridors and storerooms on all floors are compliant. It is also confirmed that corridors will be provided with the required fire protection.



- 6.59 The Statement confirms that the evacuation strategy for the hotel facility will be based on simultaneous evacuation. When a fire is detected anywhere within the facility, an alarm signal will sound throughout the entire facility invoking immediate evacuation of all occupants.
- 6.60 The Statement confirms that a fire appliance will have access to at least 50% of the perimeter of the building. Therefore, fire mains are not required within the building.
- 6.61 The proposed development therefore complies with **Policy D12 (A) and (B)** of the London Plan.



## 7 Planning Balance

7.1 The planning balance exercise is generally known as the process through which the benefits of a scheme are weighed against elements of the scheme that would be considered harmful.

7.2 Paragraph 7 of the NPPF guides that three overarching objectives cumulatively define sustainable development. These objectives are economic, social, and environmental. When breaking down these elements as they relate to this proposed development the benefits can be detailed as follows:

### **Economic Objective**

- The Site would bring back use to existing vacant upper floors in Kentish Town Centre, contributing to active uses and the vitality of the Centre.
- The retention of the existing retail units at ground floor, protecting their contribution to the vitality of the Town Centre.
- The construction of the development would provide a significant number of construction jobs throughout the lifespan of the development which would include local employment and generate economic output directly alongside wider multiplier benefits and allow for local spending.
- By drawing tourists into Kentish Town Centre through the provision of much needed accommodation, the proposal contributes to the vitality and viability of the Centre and the local economy.
- The marketing period has demonstrated that there is low demand for office space in the Site's location and the hotel use would bring greater economic activity to the area.

### **Social Objective**

- The provision of high-quality short-stay visitor accommodation which will support the local tourism industry.
- The provision of 10% of bedrooms as accessible rooms with appropriately sized ensuite bathrooms and appropriate access arrangements through the building.

### **Environmental Objective**

- Maximising the opportunity to make optimal use of land which is currently vacant and underutilised.
- The provision of a car free proposal in a sustainable location (PTAL 6a) which encourages walking and cycling with excellent access to goods and services.
- The re-use of an existing building as opposed to wholesale redevelopment.
- The integration of high-quality sustainability measures; including PV panels.

7.3 It is our assessment that the proposal meets and exceeds local, regional and national policy standards for the Site. In this context, taking the above considerations into account, we urge you to find that the balance is tipped in favour of the proposed development which should be approved without delay.

## 8 Summary and Conclusions

8.1 A full planning application is submitted seeking:

*“Change of use of offices on upper floors to create a 74no. bed hotel within the existing building envelope.”*

8.2 This application is accompanied by a full suite of plans and technical assessments which demonstrate that the proposals are acceptable and in accordance with local, regional and national policy, unless where material considerations indicate otherwise.

8.3 In summary, the proposal has been subject to pre-application engagement process, working with the Council. The proposal will bring vacant floors back into use providing a wide range of benefits for the Town Centre and wider area, as outlined in Section 7.

8.4 The proposed development constitutes “sustainable development” in accordance with Paragraph 8 of the NPPF and according to the provisions of Paragraph 11 of the NPPF, the development should be granted Planning Permission “without delay”.

**APPENDIX A: Pre application Response 2024/0392/PRE**

Date: 10/04/2024  
Our ref: 2024/0392/PRE  
Contact: Daren Zuk  
Direct line: 020 7974 3386  
Email: Daren.Zuk@camden.gov.uk

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[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Nicholas James,

Re: 293-299, 301-305 Kentish Town Road, London, NW5 2TJ

Thank you for submitting a pre-planning application enquiry for the above property. The required fee of £11,372.52 was received on 07/02/2024 and a virtual meeting took place on 13/03/2024 with planning officers.

### 1. Proposal

The proposal includes the change of use from offices (Class E) to hotel accommodation (Class C1) to the first, second, and third levels of nos. 293-299 and 301-305 Kentish Town Road. The hotel would consist of 74 rooms with micro-hotel style rooms. Minor exterior alterations include installation of rooflights throughout.

### 2. Site Description

The subject site includes two originally separate buildings, 293-299 and 301-305 Kentish Town Road, located on the west side of Kentish Town Road at the junction with Holmes Road. The ground floor of the buildings fronting Kentish Town Road feature commercial units, with the upper floors historically in use as offices.

The site is not located within a conservation area and is not locally or statutory listed but is located within the Kentish Town Neighbourhood Plan area.

### 3. Relevant Planning History

#### *293-299 Kentish Town Road*

8500404 – The change of use of the first floor from offices to restaurant and take-away with ancillary staff storage and office facilities. ^As shown in drawing 9172. – **Granted**  
30/04/1985

9401904 – Change of use from office (Class B1) on part of 2<sup>nd</sup> floor to a residential flat (Class C3) within the meaning of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing nos. A1 A2 A3 amended and as revised by letter dated 14th March 1995. – **Granted** 21/09/1995

**301-305 Kentish Town Road**

8500249 – Use of the 1st and 2nd floors from retail to a snooker club as shown on drawing nos. K TR 1P 2E P. **Granted 14/05/1985**

2018/2151/P – Change of use of ground floor unit facing Holmes Road from ancillary reception/storage use (Class B1) to a retail shop (Class A1). **Granted 30/09/2008**

**4. Relevant Policies and Guidance**

**The National Planning Policy Framework 2023**

**The London Plan 2021**

**Camden Local Plan 2017**

- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- E3 Tourism
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC5 Waste
- TC2 Camden's centres and other shopping areas
- TC4 Town centre uses
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials

**Camden Planning Guidance**

- CPG Developer contributions (2019)
- CPG Amenity (2021)
- CPG Design (2021)
- CPG Energy efficiency and adaptation (2021)
- CPG Transport (2021)
- CPG Sustainability (2021)
- CPG Employment Sites & Business Premises (2021)

**Kentish Town Neighbourhood Plan (2016)**

- Policy D3: Design Principles

**5. Assessment**

The planning considerations material to the determination of this application are as follows:

- Land Use
- Design
- Amenity
- Sustainability
- Transport
- Planning Obligations/CIL

## 6. Land Use

### Loss of existing Class E employment space

Policy E2 of the Local Plan seeks to protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ), or the local economy. The policy notes that the Council will resist development of business and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- a. The site or building is no longer suitable for its existing business use; and
- b. That the possibility of retaining, reusing, or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

Where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of space by specialist third party providers.

CPG Employment sites provides further guidance on the minimum expectations of the nature and contents of marketing information. Applicants are advised to respond to how the marketing exercise meets each of the following criteria:

- Use of a reputable local or national agent with a track record of letting employment space in the borough;
- A visible letting board on the property (constant throughout the marketing period);
- Marketing material should be published on the internet, including popular online property databases such as Focus and should include local or specialist channels where appropriate;
- Existing lawful use of the advertised premises should be included in the marketing materials;
- Continuous marketing over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed) to the date of the submission of the planning application;
- Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;
- Lease terms should be attractive to the market: – be for at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works – and/or include short term flexible leases for smaller premises which are appropriate for SMEs; appropriate rent-free periods should be offered to cover necessary fit out or refurbishment costs; and
- A commentary on the number and details of enquiries received, such as the number of viewings and the advertised rent at the time, including any details of why the interest was not pursued.

The submitted marketing report (prepared by BBG Real Estate, dated 7 August 2023) covers the time period from August 2021 to August 2023, thus meeting the minimum two-year marketing period noted above. The report outlines that the premises were refurbished in 2018 to make it attractive to new tenants and was marketed in a range of different sizes from 1000sqft to a total of 14,877sqft. It notes that Kentish Town has declined as an office



location over recent years, with the temporary closure of Kentish Town underground station exacerbating this issue. The rent was advertised at £39.50 per sqft, which is above the average of £34.37 per sqft within Kentish Town; this is accepted at the higher rate due to the recent refurbishment of the office. It is also noted that discounted rates were offered, but to no avail. The two-year marketing exercise included distributing to over 500 commercial agents and advertisement on major commercial property platforms.

Upon review of the submitted documentation which included a marketing report and supporting evidence showing the number and type of responses received, Officers can advise that the marketing evidence sufficiently demonstrates that the premises is not viable as office use (Class E) in the long term. The change of use is therefore considered to comply with requirements of policy E2 of the Local Plan and CPG Employment Sites & Business Premises.

#### Loss of Employment Use S.106 Contribution

In circumstances where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution towards measures which create or promote opportunities for employment or training of local people. A contribution will only be sought in cases where the net loss of employment space is 500sqm (GIA) or more. These monies will be held by the Council and used to support activities that create or promote opportunities for employment or training, which could include supporting the provision of affordable employment space within the borough.

The calculation of the appropriate contribution will take account of the proposed alternative use of the floorspace, such as for education or training use, and whether this use can be expected to create employment or training opportunities for Camden residents. The planning obligation for loss of employment floorspace is based on the following formula:

*Employment floorspace lost (sqm) / space requirement per full time employee = full time jobs lost.*

*Full time jobs lost x 21% [% of Camden residents who work in Camden] x £3,995 [cost to provide training per employee] = contribution*

Based on the above formula, the loss of employment use contribution of £83,895 is calculated as follows:

Number of full-time jobs expected in an employment generating use (floorspace / average space per worker): 1382sqm / 12 = 115 full-time (FT) jobs

Net jobs lots (FT jobs expected in employment use minus FT jobs in new hotel use): 115 – 15\* = 100 FT jobs

*\* This is an estimated assumption of FT jobs at hotel of this size (74 rooms). The exact number of FT jobs should be confirmed at application stage in order to accurately calculate the contribution amount.*

Number of net jobs lost expected to be filled by Camden residents (net loss of FT jobs x % of Camden residents who work in Camden): 100 x 21% = 21 jobs

Cost of retraining and supporting number of Camden residents who would be expected to be employed in former use: 21 x £3,995 = £83,895

### Proposed Hotel Use (Class C1)

Policy E3 recognises the importance of the visitor economy in Camden and expects new, smaller-scale visitor accommodation in town centres such as Kentish Town. All tourism development and visitor accommodation must be easily reached by public transport; provide any necessary pickup and set down points for private hire cars and coaches; not result in harm to the balance and mix of uses in the area, residential amenity, local character, services for the local community, the environment or transport systems; and not lead to a loss of permanent residential accommodation.

Given the location of the proposed hotel on a town centre high street and its proximity to Kentish Town underground and National Rail station, the proposals are considered to comply with policy E3.

## **7. Design**

The proposals include minimal alterations to the exterior of the buildings and comprise the installation of rooflights to the main roofs of both buildings to allow for natural illumination to hotel rooms located in the interior of the building. This does not raise any concerns given their lack of visibility from the public realm.

It is noted that the rear elevation at second floor level of 301-305 Kentish Town Road will likely require fenestration alterations to facilitate the new hotel rooms. Further details of this elevation should be provided at application stage.

### Access

It is expected that level access would be provided across the ground and first floors of the proposed hotel, that all doors and corridors would comply with Part M building regulations, and that 20% of the hotel rooms would be wheelchair accessible.

## **8. Amenity**

Local Plan Policies A1 and A4 seek to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for redevelopment that would not harm the amenity of neighbouring residents. This includes privacy, outlook, daylight, sunlight and noise. CPG (Amenity) provides specific guidance with regards to privacy and outlook.

At current, there is insufficient information submitted to determine the impact of the proposed development on neighbouring amenity. Further information such as servicing/delivery uses, specifics on any proposed plant equipment (and associated noise impact assessments), waste storage / collection strategy, hotel management plan, details on passenger pick-up/drop-off will need to be submitted and reviewed in order for the amenity impact to be assessed.

## **9. Sustainability**

Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The current proposal would result in the retention and refurbishment of the existing building which is welcomed. Notwithstanding this, the applicant is encouraged to explore ways of making sensitivity energy efficiency improvements to the existing buildings and optimise resource efficiency.



## 10. Transport

### Site location and access to public transport

The site has a PTAL score of 6b which indicates that it has an excellent level of accessibility by public transport. Kentish Town underground and National Rail station is located approximately 120m north of the site. The nearest bus stops are located approximately 50m and 100m south of the site, providing services to Archway and Highgate, and Chalk Farm and Camden Town, respectively.

There is a commitment to introduce segregated cycle route improvements on Kentish Town Road between Royal College Street and Fortress Road. The development is not well served by the Santander cycle hire scheme, with the nearest docking station located on Bonny Street outside Camden Road Railway Station, approximately 1km south of the site.

There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Islip Street and Gaisford Street. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

### Policy Review

Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free. Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets out objectives, policies, and measures for achieving this goal.

Priorities include:

- increasing walking and cycling
- improving public transport in the Borough
- reducing car ownership and use
- improving the quality of our air
- making our streets and transport networks safe, accessible, and inclusive for all.

The plan includes commitments, all of which are pertinent to this application:

- a. introduce segregated cycle route on Kentish Town Road segregated cycle corridor (primary route) between Royal College Street and Fortress Road, which forms part of a borough wide 'Healthy Routes - strategic cycling corridors' programme of works;
- b. upgrade in-flight Healthy School Street scheme to wider Safe & Healthy Streets intervention with potential further traffic restriction measures and Healthy Streets initiatives (cycle hangars, EVCPs etc), in the Holmes Road Area/Kentish Town West area, which forms part of a borough wide Healthy Neighbourhoods programme;
- c. continue to expand our dockless bike and e-scooter hire network; and
- d. to contribute towards the implementation of the CTS Cycling Action Plan and Walking and Accessibility Action Plan.

### Trip Generation

A full Transport Assessment should be submitted with any future application, including a trip generation analysis and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance.

Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Kentish Town underground and National Rail station, and bus stops along Kentish Town Road.

### Access and Permeability

The site is located on a typical high street, with shops and residential properties nearby. Holmes Road to the south of the site will provide the main hotel entrance for pedestrians only. A secondary pedestrian access is proposed onto Kentish Town Road; however, this will be for hotel staff only, whilst also being used for servicing activity. Further detail on cycle access should be provided at application stage. Delivery and servicing arrangements, further described later in the document, should not conflict with staff arriving to and leaving the premises.

### Cycle Parking

The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for C1 use, hotels: 1 space per 20 bedrooms long-stay, and 1 space per 50 bedrooms short-stay.

5 long-stay spaces and 2 short-stay spaces are proposed to be provided within a sheltered and secure storage accessible by a suitably sized lift. Further cycle parking details should be submitted with any future application.

### Car Parking and Vehicle Access

The site is located in controlled parking zones CA-M East Kentish Town and in CA-L Outer, which operate 08:30-18:30 Monday to Friday.

The development is proposed as car-free, which would be secured by legal agreement if planning consent were granted.

Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site'.

According to the Transport Note, the applicant is willing to provide a disabled parking space in the vicinity of the site, for which a contribution of £4k will apply. A suitable location on Holmes Road will be considered.

It is expected the large majority of guests and staff to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by a s.106 legal agreement in accordance with policy A1 if planning permission were granted.

#### Coach Parking and Taxis

The Transport Note states: *'With respect to coach parking, this is not expected due to the scale and nature of the hotel and the fact it will not provide any ancillary features that could otherwise generate a need for larger group and coach bookings (e.g. there are no conference facilities or similar).'*

Concerns are raised over the possibility of the hotel attracting the arrival of coach parties (which may be outside the applicant's control) causing delays and safety issues in the local area. We would therefore require a Coach Free planning obligation to be secured by legal agreement stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Local Plan policy E3 (paragraph 5.60).

Trip generation analysis should include taxi trips in support of any future planning application.

#### Construction Management

Construction Management Plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The applicant is requested to refer to Camden guidance on construction management and submit a draft Construction Management Plan (CMP) using the Council's CMP pro-forma with any application. A more detailed CMP document will also be secured by legal agreement in accordance with policy A1 if planning permission is granted.

The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction. Implementation support contributions of £10,116 and construction impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by a s.106 legal agreement.

#### Deliveries and Servicing

The hotel is anticipated to generate a daily servicing demand of 1-2 vehicles. The proposed servicing strategy involves using the double yellow lines adjacent to the site on Kentish Town Road, which allow loading other than between 7-10am and 4-7pm, Monday - Friday. This is an existing situation for other adjacent commercial properties. The applicant is also willing to explore a possibility of providing a dropped kerb on the footway on Kentish Town Road to help with the transfer of goods from the back of the vehicle to the site. Considering the planned segregated cycle lanes on Kentish Town Road, servicing from this location may not be possible. Alternative arrangements from Holmes Road should be explored. A full Delivery and Servicing Plan shall be provided with any future application.



### Highway Works

The applicant would be financially responsible for any works relating to changes or repairs to the highway. This concerns the potential dropped kerb on Kentish Town Road to support servicing arrangements. The Council therefore seeks to secure a highways contribution to make any changes or repairs to the public highway in the direct vicinity of the development. This will be secured by legal agreement if planning permission is granted.

It is felt that significant damage to the public highway is unlikely to be caused during demolition and construction. However, it is suggested that a highways contribution of £20,000 be secured by a s.106 legal agreement if planning permission is granted.

### Pedestrian, Cycling and Environmental Improvements

The Council is developing proposals which will transform the public realm in the area and enhance the attractiveness of many streets for pedestrians and cyclists. We may seek a financial contribution towards the planned improvements at Kentish Town National Rail station, which include step free access, new station entrance and enhanced town square.

In line with the Council's CTS Delivery Plan 2024/25 which is expected to be delivered through various sources, we will also seek a financial contribution towards:

- the segregated cycle route improvements on Kentish Town Road between Royal College Street and Fortess Road, and
- the upgrade of the in-flight Healthy School Street scheme to wider Safe & Healthy Streets interventions with potential further traffic restriction measures and Healthy Streets initiatives (junction improvements, pedestrian crossings, traffic calming, EVCPs etc), in the Holmes Road Area/Kentish Town West area.

The level of financial contribution to be sought will be determined once a planning application has been submitted.

### Micromobility Improvements

Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire improvements contribution of £5,000 would therefore be secured as a s.106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

## 11. Planning Obligations/CIL

The following S.106 planning obligations may be required if planning permission were granted:

- Car-free (business) development
- Construction Management Plan and Implementation Support Contribution £10,116
- Impact Bond £16,000
- Highways Contribution £20,000
- Coach Free clause
- Pedestrian, Cycling, and Environmental Improvement Contribution (amount TBD at application stage)
- Cycle and E-Scooter Contribution £5,000
- EV Charging Point Contribution £20,000
- Loss of Employment Space Contribution £83,895 (exact amount to be calculated and confirmed at application stage)

## 12. Conclusion

It is considered that hotel accommodation is supportable in this location given the proximity to high quality transport options as well as its location within the Kentish Town town centre. The proposed conversion of existing office space (Class E) to hotel accommodation (Class C1) is supportable in land use policy terms as it has been demonstrated that the existing office use is not viable long term. The required marketing evidence, for a length of two years or more, has been submitted to assess the suitability of the change of use and considered sufficient to comply with policy E2 of the Local Plan and CPG Employment Sites & Business Premises.

## 13. Planning Application Information

Should you choose to submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed application form
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning Statement
- Design and Access Statement
- Transportation Assessment
- Delivery and Servicing Plan
- Waste Storage and Collection Plans
- Hotel Management Plan
- Marketing Evidence
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours to discuss the proposals.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document, please do not hesitate to contact Daren Zuk on 020 7974 3386 or [daren.zuk@camden.gov.uk](mailto:daren.zuk@camden.gov.uk).

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Daren Zuk

*Senior Planning Officer  
Planning Solutions Team*