

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>	14/02/2025
		N/A		<b>Consultation Expiry Date:</b>	09/02/2025
<b>Officer</b>			<b>Application Number(s)</b>		
Kristina Smith			2024/5753/P		
<b>Application Address</b>			<b>Drawing Numbers</b>		
8-9 Spring Place London NW5 3ER			<i>Refer to Draft Decision Notice</i>		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal(s)</b>					
Change of use from office (Use Class E) to a hotel (Use Class C1) with plant and PV at roof level					
<b>Recommendation(s):</b>		Refuse planning permission			
<b>Application Type:</b>		Full Planning Permission			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>			
<b>Informatives:</b>				
<b>Consultations</b>				
<b>Adjoining Occupiers:</b>	No. of responses	<b>01</b>	No. of objections	<b>01</b>
<b>Summary of consultation responses:</b>	<p>Two site notices were displayed from 16/01/2025 (expired 09/02/2025)</p> <p>One objection was received from a neighbouring resident which can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• The proposed placement of PV and plant equipment is extremely close to my outdoor space and bedroom window and raises concerns about potential noise and glare from the solar panels and impact on enjoyment of home and terrace.</li> <li>• Referencing permitted development conditions, the proposed PV installation should not be installed within a 5m boundary from a neighbouring property. The proposal therefore contravenes established guidelines.</li> <li>• The local area has a pressing need for additional housing rather than hotel accommodation. Prioritizing residential development would better serve the community's interests and address current housing shortages.</li> </ul> <p><i>Officer response: Noted. Please refer to amenity and land use sections of the report.</i></p>			
<b>Local Groups response:</b>	No representations received.			

## Site Description

The existing site comprises a three-storey building in lawful use as office accommodation, though the premises have recently been used unlawfully as 30 residential units (Class C3). The site is not within a Conservation Area and is outside of a designated Town Centre.

The immediate surrounding area constitutes a residential block to the south and a commercial building to the north, with predominantly residential neighbourhoods to the north, south and west and an industrial area to the west, with Kentish Town Centre slightly further afield.

## Relevant History

### Application site

- **EN16/0772**: An enforcement investigation relating to the 'unlawful conversion of an office block into no.30 residential units' remains open.
- **2013/6494/P**: Certificate was **granted** on the 17/01/2014 for the 'Use as offices on the ground, first and second floors'
- **2014/4578/P**: GPDO prior approval was **required and granted** subject to Section 106 Legal agreement on the 03/09/2014 for the 'Change of use from office (Class B1a) to 13 x residential units (Class C3) with amenity provision and external landscaping'

### 3-6 Spring Place

- **2016/5181/P** - Erection of a part-six and part-two storey (above single basement level) building comprising Office (Class B1) at ground and upper floors; Cafe (Class A3) and flexible event space (Sui Generis) at ground floor and associated works following demolition of existing two-storey industrial (Class B2) building. **Granted subject to s106 10/01/2018** (not implemented, permission lapsed)

## Relevant policies

### **National Planning Policy Framework 2024**

#### **London Plan 2021**

GG2 Making the best use of land  
SI2 Minimising greenhouse gas emissions  
SI3 Energy infrastructure  
E1 Offices  
E2 Providing suitable business space  
E10 Visitor infrastructure  
T4(Assessing and mitigating transport impacts  
T6.4 Hotel and leisure uses parking  
T7 Deliveries, servicing and construction  
D7 Inclusive design  
D11 Safety, security and resilience to emergency  
D12 Fire safety  
D14 Noise

#### **Camden Local Plan 2017**

G1 Delivery and location of growth  
A1 Managing the impact of development  
A3 Biodiversity  
D1 Design  
E1 Economic development  
E2 Employment premises and sites  
E3 Tourism  
T1 Prioritising walking, cycling and public transport  
T2 Parking and car-free development

T4 Sustainable movement of goods and materials  
CC1 Climate change mitigation  
CC2 Adapting to climate change  
CC3 Water and flooding  
CC4 Air quality  
CC5 Waste  
DM1 Delivery and monitoring

## **Kentish Town Planning Framework (2020)**

### **Camden Planning Guidance**

CPG Access for all 2019  
CPG Design 2021  
CPG Amenity 2021  
CPG Transport 2021  
CPG Employment sites and business premises  
CPG Energy efficiency and adaptation 2021  
CPG Developer's contributions 2019

## **Assessment**

### **1 Proposal and Background**

- 1.1 The lawful use of the building is Class E; however, it was used unlawfully as 30 substandard residential units for a number of years. The site was subject to an enforcement investigation and a notice was issued requiring the residential use to cease. The notice was complied with and the enforcement case closed in 2024.
- 1.2 The application seeks planning permission for the retention of the existing building, changing its use from an office building to a hotel. The layout of the building would retain the internal partitions associated with the unlawful residential units, essentially converting them into hotel rooms. External alterations include the provision of bin and cycle storage and the installation of PV panels and plant equipment.
- 1.3 The hotel would comprise 29 rooms with a mix of room sizes including 13x double rooms, 8x triple rooms and 8x quadruple rooms with a maximum occupancy level of 82 persons. All rooms would have ensembles; there are no shared facilities proposed. The hotel would include a reception but no kitchen or food / drink offering.

### **2 Assessment**

2.1 The main considerations in the determination of the application are:

- Land use
- Design
- Amenity of neighbouring occupiers
- Energy and Sustainability
- Water and Drainage
- Inclusive economy
- Transport considerations
- Biodiversity Net Gain

### **3 Land use**

Loss of office

- 3.1 Policy E1 (part E) of the London Plan 2021 requires existing viable office floorspace capacity in locations outside of the CAZ and other nationally significant office locations to be retained whilst surplus office capacity can be released for other uses. The explanatory text at para 6.1.7 requires surplus office space to be evidenced through strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document).
- 3.2 Policy E2 of the Local Plan states that the Council will resist development of businesses premises for non-business use unless it is demonstrated to the Council's satisfaction that the site or building is no longer suitable for its existing business use and that a similar or alternative type and size of business use has been fully explored.
- 3.3 Where a loss of business use is proposed, the Council will require evidence of a marketing exercise and CPG *Employment sites and business premises* details the minimum requirements that such an exercise should include. Importantly it should demonstrate continuous marketing over at least a 2-year period (though where a building is vacant some degree of flexibility may be offered here) prior to the submission of the planning application.
- 3.4 A marketing report prepared by a leasing agent has been submitted but the contents of this are entirely general and comments on market trends within the Northern Fringe office market which is a huge area encompassing Angel, Shoreditch and Camden Town in the south and Tottenham in the north. There is nothing in the submission that demonstrates the site has actively been marketed and therefore the assertions made by the applicant and their leasing agent are purely based on assumptions.
- 3.5 Whilst some of the conclusions reached may be true, the Council cannot accept this as evidence for why the site is no longer a viable location for business use.

#### Provision of hotel

- 3.6 Part G of policy E10 of the London Plan 2021 requires visitor accommodation to be promoted in town centres and within Opportunity Areas where they are well-connected by public transport.
- 3.7 Policy E3 of the Local Plan expects large scale visitor accommodation to be located in Central London with smaller scale visitor accommodation in Town Centres. Where the proposed location is outside of these areas, it should have a local or specialist focus.
- 3.8 In terms of scale, the total floorspace of the proposed hotel is 1,213 sqm which exceeds the 1,000 sqm threshold for a large-scale hotel posited by the supporting text of policy E3 (para 5.58); however relative to other recent hotel developments in the Borough, the exceedance is only fairly minor. The proposed hotel is considered neither large nor small scale. In any event, its scale is somewhat academic in this case as the site is not within a town centre nor Opportunity Area and does not have the public transport accessibility credentials, or surrounding supporting uses, of those locations. The surrounding area is predominantly residential with the immediate area having a more commercial character comprising local businesses. There are no local tourism attractions that would justify the need for a hotel outside the areas promoted by regional and local planning policy. As such, the principle of the proposed location for a hotel is not supported.

## **4 Design**

### External alterations

- 4.1 Policy D1 of the Local Plan requires all developments to be of the highest standard of design.
- 4.2 A new plant room and 6 enclosed ASHPs would be located adjacent to an existing lift overrun

which is visible in fleeting glimpses from Spring Place to the north of the site. Given the taller residential building to the south forms the backdrop to the roof profile, the plant room and enclosed ASHP units would not appear as a prominent addition to the roof.

- 4.3 The PV array may have some visibility in public views from street level; but this would be minimal and not harmful to the host building. Further details on the positioning of the panels would have been conditioned to minimise their visibility were planning permission to be granted.

#### Internal layout

- 4.4 The standard of accommodation at ground floor level is very poor with 7 of the rooms having no windows and a further 6 with windows looking out onto a narrow dark passageway. However, there is no specific planning policy or guidance that sets out standards of amenity for hotel accommodation. Camden Policy A1 only refers to development being to the comfort of the short stay occupants and daylight standards contained within the BRE 'Site Layout Planning for Daylight and Sunlight' (2022) are generally applied to residential (Class C3) situations only.
- 4.5 A previous appeal decision in the Borough has found that while it is a legitimate viewpoint to think of rooms without windows as unsuitable for visitors, there is no support in planning policy or guidance and visitors to London have a wide choice of accommodation to suit their individual priorities.

#### Inclusive design

- 4.6 To ensure sufficient choice for visitors who require an accessible bedroom, policy E10 of the London Plan requires 10% of new hotel bedrooms to be wheelchair accessible. The proposal includes 3 (out of 29 hotel rooms) wheelchair accessible rooms therefore meeting the 10%.

### **5 Impact on the amenity of surrounding occupiers**

- 5.1 There are no changes to the massing of the building other than a small plant room located within the middle of the roof. As such there would be no implications for loss of daylight and sunlight. The provision of a plant room and PV array would not materially worsen the existing outlook for surrounding residential neighbours.
- 5.2 To mitigate the impact to neighbouring residents, a Hotel Management Plan would typically be secured as part of the Section 106 legal agreement for new hotels. Such a plan would set out how the hotel operator intends to manage the comings and goings of guests, mitigation measures for noise nuisance and the hours areas of the hotel will be managed by staff.
- 5.3 A Noise Impact Assessment was not submitted with the application; however, given the distance between residential windows and the proposed ASHPs it is expected that the noise levels could meet the Council's noise standards. Were planning permission to be granted, a condition would have been attached requiring full details of the ASHP installation together with a noise impact assessment.

### **6 Energy and Sustainability**

#### *Energy use*

- 6.1 In line with policies CC1 and CC2, the Council will require all development to minimise the effects of climate change through reducing carbon dioxide emissions and incorporating sustainable design and construction measures. The proposal involves the retention and refurbishment of an existing building and the corresponding policy goals are firstly to demonstrate the 'greatest possible reduction' in CO2 emissions from demand reduction, and secondly to achieve a 20% reduction in CO2 emissions through the use of renewable energy.

6.2 An energy assessment was submitted with the application that demonstrates the building would achieve a 15% reduction in carbon emissions at 'be lean' stage, with PV panels and ASHP further reducing emissions by 23% at 'be green' stage. Once energy efficiency measures and renewable energy is considered, a cumulative saving of 35% is achieved. Were planning permission granted, the energy plan would be secured as a section 106 planning obligation. The absence of such an agreement to secure this will constitute a reason for refusal.

### *Sustainability*

6.3 Policy CC2 requires all non-residential development of 500 sqm or more to achieve BREEAM 'Excellent' rating achieving 60% of all available Energy and Water credits and 40% of available Materials credits. In this case, the proposal involves a refurbishment scheme of limited scope with no new floorspace.

6.4 A BREEAM Refurbishment and Fit Out assessment has been submitted that demonstrates the development would achieve a score of 66.76%% which translates to a Very Good rating. The development would achieve 60% of available Energy and Water credits and 40% of available material credits. The applicant endeavours to review this as the design progresses and opportunity to improve could be secured through a planning obligation.

6.5 Were the application to be supported, the sustainability plan and BREEAM 'Very Good' rating would be secured via a Section 106 legal agreement but the absence of such an agreement to secure these benefits will constitute a reason for refusal.

## **7 Biodiversity**

7.1 There is currently no existing biodiversity on site, and none is proposed. The large area of flat roof is considered a missed opportunity for a biodiverse roof, which could be provided beneath the solar PVs.

7.2 The application does not require the approval of a Biodiversity Gain Plan before development is begun because it is below the de minimis threshold, meaning it does not impact an onsite priority habitat and impacts less than 25sqm of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of linear habitat.

## **8 Transport Considerations**

### *Trip generation*

8.1 There has been no office use at the site since 2012. The TRICS database was used to derive the anticipated total person trip rates for the proposed hotel, which are presented in Table 6E of the TS and reproduced here.

**Table 6E Trip Generation – Proposed Hotel Use**

Modes	AM Peak Hour			PM Peak Hour		
	In	Out	Two-way	In	Out	Two-way
Underground, metro, light rail or tram	1	3	4	2	3	5
Train	1	1	2	1	0	1
Bus, minibus or coach	0	0	0	0	1	1
Taxi	0	0	0	1	1	2
All vehicles (except taxis)	0	0	0	0	0	0
Passenger in a car or van	0	0	0	0	0	0
Bicycle	0	0	0	0	0	0
On foot	1	3	4	3	4	7
<b>Total</b>	<b>3</b>	<b>7</b>	<b>10</b>	<b>7</b>	<b>9</b>	<b>16</b>

8.2 The proposal will result in an increase of in-person trips, especially during peak hours. The anticipated high volume of the walking trips is likely to be made from Kentish Town West London

Overground Station, Kentish Town Railway & Underground Station, Chalk Farm Underground Station, bus stops along Kentish Town Road, Prince of Wales Road and Malden Road and commercial, entertainment, shopping, and restaurant venues in Kentish Town, Camden Town, Tufnell Park, Chalk Farm, and further afield.

8.3 Considering the increase in active travel, the applicant will be requested to provide financial contributions towards the following Camden Transport Strategy (CTS) commitments:

- introduce segregated cycle route on Kentish Town Road segregated cycle corridor (primary route) between Royal College Street and Fortess Road, which forms part of a borough wide 'Healthy Routes - strategic cycling corridors' programme of works,
- 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,
- continue to expand our dockless bike and e-scooter hire network, and
- contribute towards the implementation of the CTS Cycling Action Plan and Walking and Accessibility Action Plan.

8.4 An Active Travel Zone (ATZ) assessment included in the TA focuses on four routes to key destinations. The analysis recommends various improvements to pavement quality in the local area to enhance the walking environment.

#### Travel planning

8.5 According to the Thresholds for Travel Plans specified in CPG Transport, the development is not required to provide a Travel Pla. Nonetheless, a Framework Travel Plan was submitted in support of the planning application which demonstrates a welcomed commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel are ambitious, which is welcomed.

#### Access and permeability

8.6 Pedestrian and cycle access will continue in line with the existing arrangements via the forecourt from Spring Place. There is no motor vehicle access to the site.

#### Cycle parking

8.7 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.

8.8 Six long-stay spaces are proposed within the forecourt. According to the ground floor plan Drawing 1430 / 01 / 060, three Sheffield stands will be provided in a covered cycle store. The cycle parking arrangements are considered acceptable. Were planning permission to be granted, the cycle parking provision would be secured by condition.

#### Car parking and vehicle access

8.9 The site is located in controlled parking zone CA-L Outer, which operates 08:30-18:30 Monday to Friday.

8.10 The development is proposed as car-free, which would be secured by legal agreement if planning consent were granted. The absence of a s106 legal agreement securing the contribution will constitute a reason for refusal.

8.11 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.'*

8.12 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'.*

8.13 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site. The absence of a s106 legal agreement securing the contribution will constitute a reason for refusal.

#### Coach parking and taxis

8.14 TS states: *'The hotel operator will implement booking system which restricts bookings of more than six people, to discourage coach parties arriving to the hotel and ensuring that the hotel will not advertise coach bookings'.* However, there remains a possibility that the hotel could still attract coach parties (which may be outside the applicant's control) causing delays and safety issues in the local area. Were planning permission to be granted, the Hotel Management Plan would include an obligation for the development to be 'Coach Free' to ensure 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. This is in accordance with Camden Local Plan Policy E3 (paragraph 5.60).

8.15 Taxis pick-up and drop-off can be achieved from Spring Place without detriment to the road network.

#### Deliveries and servicing

8.16 A Delivery and Servicing Plan was submitted with the application. The hotel is anticipated to generate a daily servicing demand of 1-2 vehicles. Delivery and refuse collection, by private contractor, will take place on street in line with the existing arrangements for the neighbouring properties.

#### Pedestrian, cycling and environmental improvements

8.17 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.

8.18 It is therefore appropriate that all developments, even those with limited transport impact, should contribute towards future safe and healthy streets infrastructure schemes for several reasons:

- Investing in active travel infrastructure supports environmental and public health objectives by encouraging sustainable travel options.
- Contributions from developments today help ensure that adequate infrastructure is in place when future demand increases, rather than reacting to issues as they arise.
- By requiring all developments to contribute, funding for active travel infrastructure is spread more evenly. This ensures that the financial burden is not placed disproportionately on

developments with significant transport impacts.

- Contributions from small developments can help manage and mitigate cumulative impacts over time and support sustainable growth.
- Implementing active travel infrastructure is essential for creating greener, more sustainable Camden.

8.19 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. Considering the anticipated increase in cycle and walking trips generated by the proposed development, and further promoted by the Travel Plan, a financial contribution of £30,000 is considered proportionate which would go towards:

- the segregated cycle route improvements on Kentish Town Road between Royal College Street and Fortess Road, and
- the upgrade of the Healthy School Street scheme on Holmes Road 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.

8.20 The absence of a s106 legal agreement securing the contribution will constitute a reason for refusal.

#### Micro and shared mobility improvements

8.21 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.

8.22 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the very low STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.

8.23 A cycle/e-scooter hire improvements contribution of £2,000 would therefore be secured as a Section 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.

8.24 The absence of a s106 legal agreement securing the contribution will constitute a reason for refusal.

## **9 Safety and Security**

9.1 Camden Local Plan policy C5 (safety and security) and CPG Design are relevant with regards to 'secure by design'. The policy notes that the Council will require developments to demonstrate that they have incorporated design principles that contribute to community safety and security.

9.2 Were the proposal to have been supported, further details would have been requested regarding safety and security of the hotel operation including management of guests as well as a requirement for employees to undergo Operation Makesafe training. The safety and security strategy would have been secured by the Hotel Management Plan, and the lack of such plan will constitute a reason for refusal.

## 10 Recommendation

### 10.1 Refuse Planning Permission on the following grounds:

- The proposed development, in the absence of any evidence to show that the property has been marketed for a suitable length of time, fails to demonstrate that the existing business use is no longer viable and capable of providing employment benefits to local residents and businesses contrary to policies E1 and E2 of the Camden Local Plan 2017 and policies E1 and E2 of the London Plan 2021.
- The proposed development, which includes the provision of a hotel outside the Central London Area or a Town Centre, would fail to make the best use of its site and risks harm to local character contrary to policies G1 (Delivery and location of growth) and E3 (Tourism) of the Camden Local Plan 2017 and policy E10 (visitor infrastructure) of the London Plan 2021.
- The proposed development, in the absence of a Hotel Management Plan, risks harm to residential amenity, the local transport network and public safety contrary to policies C5 (Safety and security), E3 (Tourism), T2 (Parking and car-free development) and T4 of the Camden Local Plan 2017 and policies E10 (visitor infrastructure), T4 (Assessing and mitigating transport impacts), T6.4 (Hotel and leisure uses parking), D11 (Safety, security and resilience to emergency) and D14 (Noise) of the London Plan 2021.
- The proposed development, in the absence of a legal agreement to secure a financial contribution towards pedestrian, cyclist and environmental improvements in the area, would fail to mitigate the impact of the development created by increased trips, contrary to policies T1 (Prioritising walking, cycling and public transport), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017 and policy T4 (Assessing and mitigating transport impacts) of the London Plan 2021.
- The proposed development, in the absence of a legal agreement to secure a financial contribution towards micro and shared mobility improvements, would fail to promote active and sustainable travel options contrary to policies T1 (Prioritising walking, cycling and public transport) and T3 (Transport infrastructure) of the Camden Local Plan 2017 and policy T4 (Assessing and mitigating transport impacts) of the London Plan 2021.
- The proposed development, in the absence of a legal agreement to secure a financial contribution for a disabled parking space within 50m of the development, would fail to promote fair access and opportunity for all contrary to policy C6 (Access for all) of the Camden Local Plan 2017 and policy T6 (Car parking) and T6.4 (Hotel and leisure uses parking) of the London Plan 2021.
- The proposed development, in the absence of a legal agreement to secure the details set out in the sustainability and energy plans and BREEAM pre-assessment, would be likely to contribute unacceptably to climate change, contrary to policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the Camden Local Plan 2017 and policies SI2 (Minimising greenhouse gas emissions) and SI3 (Energy infrastructure) of the London Plan 2021.
- The proposal, in the absence of a legal agreement to secure a car-free development, would be likely to contribute unacceptably to parking stress, environmental impacts and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and car-free development) and CC1 (Climate change mitigation) of the Camden Local Plan 2017.