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Date: 27/02/2024
Our ref: 2025/0208/PRE
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Dear Elisha,

Re: 9 - 12 New College Parade, London, NW3 5EX

Thank you for submitting the above pre-planning application enquiry on 17/01/2025 for Retention of existing two storey facade and basement, and redevelopment to provide a four storey (plus basement) 52 -room hotel building.

The required fee of £4,562.50 was received on 20/01/2025. A Teams meeting was held on 13/02/2025.

Site constraints

- Finchley Road / Swiss Cottage Town Centre (secondary frontage)
- Contaminated sites potential
- TFL Underground Zone of Influence
- TFL Red Route
- Historically Flooded Street
- Underground development constraint – surface water flow and flooding
- Underground development constraint – Slope stability
- [adjacent to Fitzjohns Netherhall Conservation Area]
- [Grade II listed Nurse's Home to rear]

Relevant policies and guidance

[National Planning Policy Framework 2024](#)

[The London Plan 2021](#)

[Camden Local Plan 2017](#)

A1 Managing the impact of development

A3 Biodiversity
 D1 Design
 D2 Heritage
 C5 Access
 H2 Maximising the supply of self-contained housing from mixed-use schemes
 E1 Economic development
 E2 Employment sites and premises
 E3 Tourism
 CC1 Climate change mitigation
 CC2 Adapting to climate change
 CC3 Water
 CC4 Air quality
 CC5 Waste
 TC4 Town centre uses
 T1 Prioritising walking, cycling and public transport
 T2 Parking and car-free development

Camden Planning Guidance

Air Quality (2021)
 Amenity (2021)
 Design (2021)
 Employment Sites and Business Premises (2021)
 Energy efficiency and adaptation (2021)
 Housing (2021)
 Town centres and retail (2021)

Site description

The site is on the north side of Finchley Road close to the junction with College Crescent. The site comprises two double fronted ornate two storey buildings dating from 1916 in commercial use. Together with no's 1-8, a more modern part-commercial, part-residential development of three storeys (in the same ownership as the application site), the building forms part of a noticeably lower section of the street with the established height in the wider area being in the range of 4-6 storeys.

The site is in the Finchley Road Town Centre. To the north east of the application site, there is a Grade II Listed Victorian House, most recently in use as a backpackers' hostel. The site is not within a conservation area.

Relevant Planning History

2013/8191/P - Erection of 5 storey mixed use building with basement floor to provide commercial uses (Classes A1/A3) at ground and basement floor levels and provision of 9 residential units on upper floors (4 x 1, 4 x 2, 1 x 3 bed) including communal garden at 1st floor level and rear terraces at 1st-4th floor levels, following the demolition of existing two

storey commercial building. **Granted Subject to a Section 106 Legal Agreement 30/01/2015**

2022/5568/P - Retention of existing two storey facade and upwards extension to provide a 7 storey (plus basement) building with retail, bin / bike stores and lobby at basement / ground floor levels, hotel at first to fourth floor levels and 6 residential units at fifth and sixth floor levels. **Withdrawn 20/08/2015**

2024/3454/P – Retention of existing two storey facade and basement, and redevelopment to provide a seven storey (plus basement) building comprising hotel and retail uses and 3 x residential units at first floor and associated bin/cycle stores. **In progress**

Proposal

The proposal is for the retention of existing two storey facade and basement, and redevelopment to provide a four storey (plus basement) 52 x room hotel building.

The building would be fully occupied by the hotel (C1) use, with accompanying restaurant at ground floor and basement levels. The building would be accessed from Finchley Road.

Hotel rooms are located across first, second, third and fourth floors, with additional rooms at basement and ground floor with outlook to either Finchley Road, or to the rear towards properties on New College Parade.

Bin storage and cycle storage (for guests) would be provided at ground floor level. Separate cycle storage for staff would be provided in the basement.

The hotel would have a total floor area of 1,629sqm (GIA) with a building height of 16.5m.

Assessment

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

- Land use
- Design
- Amenity
- Transport
- Energy and Sustainability
- Air quality
- Water and drainage
- Economy

Land use

Policy commentary:

The London Plan Policy E10 endorses the provision of "smaller-scale" serviced accommodation in "other parts of the CAZ" (-except in wholly residential streets or predominantly residential neighbourhoods) and "subject to the impact on office space and other strategic functions."

Local Plan Policy E3 expects new, large-scale tourism development and visitor accommodation to be located in Central London, while allowing for smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage.

To support the aims of Policy H1 (Maximising housing supply), where non-residential development is proposed, Policy H2 Maximising the supply of self-contained housing from mixed-use schemes, promotes the inclusion of self-contained homes as part of a mix of uses.

The Council will encourage the inclusion of self-contained homes in non-residential development in all parts of the borough.

In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floor space of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self contained housing, subject to the following considerations.

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account a number of specified criteria

Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek the provision of housing on an alternative site nearby or, exceptionally, a payment-in-lieu.

In considering whether housing should be provided on-site and the most appropriate mix of housing and other uses, the Council will take into account criteria a number of specified criteria.

Response:

While the preference would be for self-contained housing to be the primary use of any new development at the site – recognising this is the priority land use in the local plan for all underused and vacant buildings – it is accepted the site's location on a busy road with poor air quality, in Finchley Road town centre and in convenient access to two tube stations, makes the primary use of the site well-suited for visitor accommodation.

However, it is expected that the provision of visitor accommodation at the site is balanced against the need to also provide self-contained housing at the site and proposals clearly demonstrate that 'maximum reasonable provision of housing' has been incorporated into the scheme.

The challenges of providing sufficient visitor accommodation and on-site housing is acknowledged. A minimum number of hotel units are sought to make the hotel use viable whilst there are height constraints largely driven by the need to avoid an unacceptable harm to the amenity of properties to the rear, as well as being in-keeping with the

surrounding townscape. Providing two cores, and potentially a secondary stair for the residential within a constrained building could result in an inefficient use of the site where both uses would be compromised. As touched on before, there were also concerns, particularly at lower floors, about the Air Quality of potential permanent residential, and the overlooking to the rear (which in a hotel scheme can be overcome by partially obscured windows)

The planning submission should clearly outline the work that has been undertaken to date in seeking to provide on-site residential housing (both a housing only scheme, and a mixed-use visitor accommodation and housing scheme), and why this has not been considered feasible/deliverable.

As discussed above, where it is not possible to provide an appropriate amount of additional housing at the site, this could potentially be delivered off site in the area. If on site and off site provision is not feasible, the Council may seek a payment in lieu (PIL) to our Affordable Housing fund to make up for the shortfall in residential floor space making up a minimum 50% of the total floor space proposed. Detailed information on calculating payments in lieu of housing is outlined in the CPG Housing.

As the proposed floorspace uplift is less than 1,000sqm, a payment in lieu (instead of providing on-site or off-site housing) is considered appropriate.

In this case, using the rate of payment in lieu of £1,500 per sqm GIA, and 50% of the total additional floor space proposed (421.5sqm), the payment in lieu calculation is as follows:

$$421.5\text{sqm} \times £1500 = £632,250$$

The housing contribution would be secured via a s106 legal agreement.

Loss of Retail (Class E)

The ground floor of the building comprises four commercial/retail units, with ancillary retail space at the basement and first floor.

The existing retail provision would be lost as part of the redevelopment of the site to accommodate the hotel.

The ground floor of the hotel would include a restaurant adjacent to the Finchley Road frontage. The layout of this space (as shown on the Proposed Ground Floor Plan) reads as more of a lounge space for hotel guests, with the main restaurant being provided at basement floor). It is unclear to what extent the restaurant spaces would be oriented/accessible to the general public – clarification of this should be included in the planning application. Notwithstanding, the proposed ground floor would generally accommodate an active use and have clearly visible and active shopfront glazing, not dissimilar to the existing retail frontages, thereby mitigating the loss of the existing retail frontages / uses.

The loss of the retail units would also be mitigated by the footfall which be brought about by the proposed hotel in particular through hotel guests who would pass by or otherwise have convenient access to the retail offerings in the town centre.

It is considered that the loss of the four retail units would be acceptable and would not be detrimental to the character, function, vitality and viability of the town centre.

Design and layout:

Overall design:

Local Plan Policy D1 (Design) is aimed at achieving the highest standard of design in all developments, requiring development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area. In addition, Policy D2 (Heritage) requires new development to respect local context and character; preserve or enhance the historic environment and heritage assets; comprise details and materials that are of high quality and complement the local character; and respond to natural features.

The proposed amended design with a further reduction in height and setback to the rear are considered positive moves. While it would be preferable for the rear stair enclosure to be designed to be internal to the main building footprint, it is acknowledged this amendment would undermine the viability of the scheme. With the reductions in building massing made to date, together with the rear elevation having limited visibility from the public-realm, the provision of the rear stair enclosure can be supported.

Generally, the bulk, form and design of the building can be supported, subject to the following considerations:

Living wall to rear stair enclosure:

The living wall to the rear stair enclosure doesn't integrate well with the building, being split into three separate parts. It is also unclear whether a living wall could thrive in this location, being to the north of the building in an area with constrained light.

An alternative approach to treating the rear stair enclosure has been presented, which involves creating patterned recesses in the proposed brickwork, to match the form of the hotel windows on the remainder of the rear elevation.

The approach to providing patterned brickwork, in lieu of the living wall, is supported. Option 2 is the preferred of the three options.

Hotel windows to rear elevation:

It is suggested the rear elevation hotel windows to at least the second to fifth floors, be treated with obscure glazing to a minimum height of 1.7m, to mitigate overlooking effects to neighbouring residential properties to the rear on New College Parade.

Views from the ground and first floor hotel windows (rear elevation) would appear to be constrained by existing vegetation and the topography which slopes up from the rear of the site.

Further information including photos taken from the rear of the site, looking towards the rear properties on New College Parade, would help inform the extent to which the rear elevation hotel windows, at the upper floors, would need to be treated with obscure glazing.

Standard of hotel accommodation including accessible rooms

The hotel layout is generally rationale and well-considered.

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. Camden Planning Guidance on 'Amenity' refers to the BRE 'Site Layout Planning for Daylight and Sunlight' (Oct 2011) which is generally applied to residential (Class C3) situations only.

Typical room layouts have been provided. Whilst the rooms would be compact, they are provided with good outlook and would be suitable for short term use by visitors.

A total of 5 x accessible rooms would be provided, which exceeds with the minimum 5% requirement in the London Plan for wheelchair accessible rooms.

The reception would have a good level of natural surveillance over the entry to the hotel, which is important in achieving crime prevention through environmental design.

A draft Hotel Operational Management Plan should be prepared, with details of the guest arrival/check-in experience, staffing, access and security, cleaning, maintenance, waste and servicing, to ensure the safe and efficient operation of the hotel and as well as facilitate good relationships with guests, visitors, neighbours and the wider local community whilst also ensuring a pro-active approach to management responsibilities. The Operational Management plan can also be used to secure restriction on coach parties accessing the hotel (see Transport comments below). The Operational Management Plan would be secured as part of the Section 106 Legal Agreement.

Once produced, the Council's Designing Out Crime Officer will review the proposals and provide feedback in relation to public safety.

Amenity

Local Plan Policy A1 seeks 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.

The findings of the Sunlight/Daylight Report are generally accepted and on balance any loss of light to adjoining residential properties could likely be accepted.

When the VSC method is considered, 145 (91%) out of 160 windows tested will fully comply with the BRE guidelines.

When the NSL method is considered, 117 (96%) out of 122 rooms tested will fully comply with the BRE guidelines.

When the APSH method is considered, all 44 (100%) relevant rooms tested will fully comply with the BRE guidelines.

Where there are transgressions, they are isolated, and the affected windows/rooms will comply with at least one daylight method of assessment and/or the retained daylight levels are considered commensurate with an urban environment. Some of the shortfalls relate to bedroom windows which are less sensitive in daylight terms than the main living spaces, or relate to a space served by an alternative window with compliant light levels, or serve secondary living spaces (such as galley windows to kitchen).

However, the report makes reference to the 2013/8191/P permission which was not implemented and has subsequently expired – the report should therefore be updated to not place any weight to this permission or use this permission as a benchmark, which is no longer of relevance to the current proposal.

Overall, the scheme has been reduced in scale through various iterations to the proposed mass/bulk of the built form over previous applications at the site, such that the amount of light reduction to adjacent properties has correspondingly been gradually reduced and reducing the extent of light impacts to neighbouring residents. Amenity effects are likely considered acceptable.

Transport

Trip generation

The applicant is requested to submit a full Transport Assessment, including a multi-modal trip generation analysis and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance, with a future application.

Based on other developments in the area, the anticipated high volume of walking trips is likely to be made from the London Underground station at Swiss Cottage, the nearby bus

stops, and from the many restaurants, shops, leisure, and entertainment venues on Finchley Road, in Swiss Cottage and Hampstead.

Considering the increase in active travel to and from the site, the applicant will be requested to provide financial contributions towards the segregated cycle lane on Fitzjohn's Avenue, and the introduction of traffic reducing measures in the local area including a Healthy School Streets scheme on College Crescent.

Travel planning

A Travel Plan in line with CPG Transport should be submitted with a future application. Further detail on Travel Plans is available on [Travel Plans - Camden Council](#).

A Travel Plan covering an associated monitoring and measures contribution of £11,348 would be secured by legal agreement if planning permission is granted.

Access and permeability

Pedestrian and cycle access to the hotel and the restaurant will be from Finchley Road. There is no vehicle access to the property.

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:

- A2-A5 (cafes & restaurants)
 - o 1 space per 175 sqm (GEA) long-stay.
 - o 1 space per 20 sqm (GEA) short-stay.
- C1 use (hotels)
 - o 1 space per 20 bedrooms long-stay,
 - o 1 space per 50 bedrooms short-stay.

It is proposed to provide 4 long stay cycle spaces for the hotel in the basement, accessed via a service lift from reception, and 2 long stay cycle spaces for the restaurant at ground floor. Visitor cycle spaces are also required.

The applicant is requested to provide full cycle parking details in line with the aforementioned guidance within the Transport Assessment to be submitted with any future application.

Car parking and vehicle access

The site is located in Controlled Parking Zone (CPZ) CA-B Belsize, which operates 08:30-18:30 Monday to Friday and 09:30-13:30 on Saturday or pay and display with maximum stay of four hours.

The development would be secured car-free by legal agreement if planning consent were granted, in line with Policy T2 of the Camden Local Plan.

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'*.

Therefore, an off-site contribution would be sought in the form of £4,000 for one disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site.

Officers expect 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 legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

CPZ Review

Objective 2 of the CTS sets out to reduce car ownership and use, and motor traffic levels in Camden, and features several measures in support of achieving this objective. One of the measures is 2d, which states that the Council will *'undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use, and use that study to help guide future reviews and decisions.'*

Controlled Parking Zones Review final report published in February 2023 appraised all Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough. The CPZ Assessment Results identified CA-B CPZ to be of medium/high priority for review, which will look at potentially expanding the hours of control and reviewing the size of the CPZ.

In 2024 we reviewed our progress so far on the CTS and also set out our delivery plan for the period covering 2025 - 2028 which was agreed by Camden Council's Cabinet. We committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:

- Controlled Parking Zone (CPZ) hours extensions
- Workplace Parking Levy

- EVCP roll out.

At present, the CA-B CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and the location of the proposed development, it is appropriate to request a contribution of £10,000 towards the CA-B CPZ review.

Coach parking and taxis

We would be concerned 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 on the streets in the vicinity of the site. The applicant has previously agreed to a 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 Camden Local Plan Policy E3 (paragraph 5.60).

Taxis are permitted to drop-off/pick-up from single and double yellow and red lines, which includes parking spaces located on New College Parade.

Construction management

The site is located on Finchley Road, which forms part of TfL's TLRN. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

More detailed DMP and CMP documents will be secured by legal agreement in accordance with Local Plan 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 £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction may also be secured by legal agreement if planning permission is granted.

Deliveries and servicing

The applicant is requested to provide a Delivery and Servicing Plan with any future application.

Highway works

Transport for London is the Highway Authority for New College Parade and may seek to enter into a S278 Agreement under the Highways Act 1980 to ensure any potential damage to the public highway during construction would be repaired at the developer's expense.

Pedestrian, cycling and environmental improvements

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.

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.

In line with the increase in walking and cycle trips which would be generated by the proposed development and further promoted by the requested Travel Plan, and the need for pedestrian, road safety and public realm enhancements, we will seek a contribution of £150,000 towards implementation of the northbound (uphill) segregated cycle lane on Fitzjohn's Avenue, with pedestrian improvements at side road junctions, which form part of a borough-wide 'Healthy Routes - strategic cycling corridors' programme of works. The contribution would also be used towards the introduction of traffic reducing measures in the local area including a Healthy School Streets scheme on College Crescent.

Transport for London are also likely to seek financial contributions towards public realm improvements on Avenue Road, Finchley Road and New College Parade, should a planning application be submitted.

Micro and shared mobility 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.

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 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.

A cycle/e-scooter hire improvements contribution of £10,000 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.

Trees

Policies A3 and D1 advise that the Council seek to protect gardens and resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value.

The proposed demolition and construction works have the potential to impact on the existing tree to the rear of the site.

Should a full application be forthcoming a tree survey and arboricultural impact assess in accordance with BS5837:2012 should be submitted as a minimum, with details of tree protection methodologies.

Energy and Sustainability

Supporting information / documentation

An Energy Statement and Sustainability Statement would be required as the proposal is for a 'major development'. Please refer to CPG Energy efficiency.

Energy reduction targets

The proposed hotel should be zero carbon, achieving a minimum 35% reduction below Part L Building Regulations onsite, with 15% reduction through on-site energy efficiency measures) (London Plan Local Plan CC1)

The hotel should also achieve a 20% Reduction in CO2 from onsite renewables (after all other energy efficiency measures have been incorporated) (London Plan, Local Plan CC1).

It is understood ASHPs with active cooling are proposed to serve the hotel rooms, reception and retail spaces. Local Plan Policy CC2 discourages active cooling (air conditioning). Air conditioning will only be permitted where thermal modelling demonstrates a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy.

There could be an opportunity to provide solar panels over the building's roof.

Many of the hotel rooms would be southwest facing and single aspect and could be prone to overheating especially in the summer months. The potential for overheating should be modelled and passive cooling measures designed in to avoid a requirement for active cooling.

Air quality

Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.

Air Quality Assessments (AQAs) are required where development is likely to expose future occupants and / or existing nearby residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact.

The site is located in an area of poor quality, particularly the frontage to Finchley Road.

A detailed Air Quality Assessment should be provided (in line with guidance in CPG Air Quality) covering:

- Operational impact of development on local area
- Include AQ Neutral assessment (all developments)
- Operational impact on occupants – this should consider both NO2 and PM2.5
- Construction impacts risk assessment.

Details of Mechanical Ventilation with Heat Recovery (MVHR) should also be submitted with any application.

Depending on the outcome of the Air Quality Assessment and modelling, then in line with London Plan Policy SI B 2) b), the development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation required.

Water and drainage

Policy CC3 is relevant with regards to flood risk and drainage. The site is located within Flood Zone 1 which is low risk from flooding from rivers and the sea. However, it is noted that the site is located on a Road that has previously flooded in 2002 and 2021.

A Flood Risk Assessment and SuDs Strategy report have been submitted as part of the live application 2024/3454/P. It is noted a blue roof and stormwater attenuation tank are proposed as the key elements of the SuDs green infrastructure. A full review of the Flood/SUDS report will be undertaken as part of the new application for the revised hotel only scheme.

The feasibility of providing a rainwater / greywater harvesting system should also be fully explored and this should be presented at application stage. Such systems are strongly encouraged in hotel schemes and must be designed in from an early stage to ensure cost efficiency.

Economy

Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to promote successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents, and recognises the importance of other employment generating uses including retail, education, health, markets, leisure and tourism.

The proposed hotel would provide jobs for local residents both during the construction and operational phases.

Construction Phase

Apprenticeships - as the build cost will exceed £3 million, the applicant must recruit **1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG** (i.e. build costs of £10 million would have 3 construction apprentices and a combined support fee of £5100). Recruitment of construction apprentices should be conducted through the Council's [Euston Skills Centre](#) (formally Kings Cross Skills Centre). The number of apprentices would be determined once the exact build cost was confirmed.

Construction Work Experience Placements - The applicant should provide a set number of work experience placements (this is one placement per 500sq m of employment floor space) of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG. With an uplift of 843 sqm Floor space, this would be **1 work experience placement**. Apprentices would be paid London Living Wage.

Local Recruitment – Camden's standard local recruitment target is **20%**. The applicant should work with the Euston Skills Centre to recruit to vacancies, advertising with Camden

for no less than a week before the roles are advertised more widely. A superseded template has been used in the formation of the Employment Skills Supply Plan statement. The updated template is attached. Employees recruited through local recruitment would be paid London Living Wage.

Local Procurement – The applicant must also sign up to the **Camden Local Procurement Code**, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of **10%** of the total value of the construction contract. While Camden does expect the developer or their contractor to be proactive in their own research on procurement or supplies within the borough, Camden's Inclusive Economy Team can liaise and assist with them and provide a suppliers/construction contacts before they commence works (the sooner the better), this service can be provided on request.

End Use / Occupation Phase Opportunities:

We would seek to secure a specific number of end use apprenticeships through the S106 agreement. We would seek to secure at least 1 apprentice on a rolling term for the future hotel. The hotel operator can liaise with Camden Apprenticeships (Euston Skills Centre can make the referral once the construction phase is over)

The developer and future hotel operator should also confirm their commitment to ensuring the site offers local employment benefits in the long term by

- Joining the Council's Inclusive Business Network and promoting this and good employment practice.
- Working with the council to deliver work experience placements through the new attraction.
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives. They've advised this will bring employment opportunities.
- Potentially to offer some kind of discount to Camden residents or local Community Groups. This could be discounts to the restaurant or access to any meeting/function rooms as a peppercorn cost or even free (Can't remember if they have one).

Health Impact Assessment

For major developments with 1,000-9,999sqm of visitor floorspace, a rapid Health Impact Assessment should be undertaken using the NHS London Healthy Urban Development's Rapid Health Impact Assessment Tool. This assessment should be submitted in support of any future planning application. See:
<http://www.healthyurbandevelopment.nhs.uk/>

Health facilities are not normally funded through CIL so any notable impact may require a financial contribution secured by s106.

Biodiversity Net Gain (BNG)

BNG is an approach to development that aims to ensure ensures that habitats for wildlife are left in a measurably better state than they were before the development. Developers must deliver a BNG target of 10%, which means a development will result in more or better-quality natural habitat than there was before development. Biodiversity net gain (BNG) is mandatory with all relevant planning applications from 12 February 2024.

The development may be exempt from BNG if the proposal does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat. Please see the following link for further information including the documents that would be required to be submitted in the event that BNG is required to be delivered and secured as part of the proposal: <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>

Based on the information available, the proposal may not require the approval of a biodiversity gain plan before development is begun because the proposed works may impact less than 25sqm of on-site habitat. Any planning application needs to demonstrate whether the development is exempt from BNG, with an exemption statement which includes a plan clearly identifying the areas of any habitat and showing why it is exempt.

Conclusion

The updated scheme can generally be supported in principle, subject to the incorporation of feedback into the submission.

It has been demonstrated through the pre-application process that it would not be feasible to provide on-site housing at the site as part of a mixed use housing and visitor accommodation scheme, and the principle of a hotel only scheme at the site is generally supported. Evidence of the impracticalities/feasibility of providing housing at the site needs to be clearly set out in any planning permission. Subject to the availability of any alternative housing delivery sites (which must be explored by the planning submission), a payment in lieu would be secured to compensate for the non-provision of housing at the site.

The proposed works would likely be considered acceptable in terms of amenity effects subject to the privacy measures.

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 Brendan Versluys on **020 7974 3202**.

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

Yours sincerely,

Brendan Versluys

**Senior Planning Officer
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