

Appendix A
Pre-Application
Reply
20 September 2011

Date 20th September 2011
Our Ref: CA\2011\enq\03416
Contact Amanda Peck
Direct Line 020 7974 5885
Email: Amanda.peck@camden.gov.uk



**Development Control
 Planning Services**
 London Borough of Camden
 Town Hall
 Argyle Street
 London WC1H 8ND

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env.devcon@camden.gov.uk
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Miss Georgina Holden
 Divine Ideas (UK) Ltd
 7A High Street
 Wanstead
 London

Dear Georgina,

Re. Planning Pre-application advice meeting ref. CA\2011\enq\03416 – redevelopment to provide 5 storey buildings on Chalton Street and Churchway with 63 room hotel and 72sqm retail floorspace on Chalton Street

I refer to our pre-application meeting held on 31 August 2011 about the above proposal.

Land uses

Existing housing

Policy CS6(d) states that the Council will aim to make full use of Camden's capacity for housing by minimising the net loss of existing homes. Paragraphs 6.17 and 6.18 states that the expected delivery of additional homes from 2010/11 to 2024/25 falls significantly short of the projected growth in the number of households up to 2026. Any loss of residential floorspace that could potentially house an individual or household would worsen this shortfall, and will be therefore be resisted by the Council.

Policy DP2 seeks to minimise the loss of housing in the borough by (d) protecting residential uses from development that would involve a net loss of residential floorspace (including residential floorspace that might be ancillary to another use) and (e) protecting permanent housing from conversion to short-stay accommodation intended for occupation for periods of less than 90 days. Paragraph 2.20 states that whilst there is a demand for short term and temporary accommodation in the borough this accommodation falls outside the Council's land use priority for housing and new demand should be met from appropriate sites in non residential use, rather than sites used for permanent housing. The Council will resist development that changes permanent housing into such short term accommodation.

Policy DP2 (f) allows for the net loss of two or more homes but only in the context of a conversions to allow for the creation of larger residential units or more appropriately sized affordable housing units. It is therefore not applicable to this proposal. Policy DP2 also allows for some loss of residential floorspace where no alternative site is available to provide small scale health care facilities and again this is not applicable to this proposal

Given the clear policy context outlined above there is a presumption against any loss of residential accommodation and floorspace. The proposal will therefore need to be amended to incorporate replacement residential floorspace as it is currently contrary to policies CS6 and DP2 and is therefore considered

unacceptable.

As discussed at the meeting there may be scope to incorporate an adjacent site in the same ownership in the proposal in order to provide this replacement housing floorspace. Should this option be explored you are advised to seek further pre application advice.

Retail use

The Chalton Road part of the site is within the Chalton Street Neighbourhood Centre. "Revised Planning Guidance for Central London, Food drink and Entertainment, Specialist and Retail use" states that on the western side of Chalton Street no objection will be raised to the introduction of a variety of non retail uses into this neighbourhood centre, however to protect residential amenity permission may only be granted for a maximum of 25% of total units to food, drink and entertainment uses.

Whilst the proposal reduces the amount of retail floorspace on site from approximately 260sqm to 65.4sqm it retains a retail element to the Chalton Street frontage (along with the hotel entrance and reception) and therefore appears acceptable in principle in this respect.

Hotel use

In line with policy DP14 – Tourism development and visitor accommodation, the Council expects tourist development to be located in the most appropriate locations, specifically the Central London area and the identified growth areas. This site, being located within the Central London Area and close to the Euston Growth Area is considered suitable for the extension of such a use. This is on the basis that the proposal provides any necessary off-highway pick up and set down points for taxis and coaches, is easily accessible to public transport and does not harm local amenity.

The proposed hotel use will introduce an employment use into Somers Town ward, one of Camden's unemployment blackspots. Chalton Street has lots of small shops and cafes, and it's likely the hotel will increase footfall and boost trade.

If a scheme is approved various S106 obligations are likely to be required to include our usual employment and local procurement obligations, a construction skills apprenticeship, and a financial contribution (in line with CPG8) of around £5,000.

Amenity

The proposal will need to be assessed with regard to loss of light, privacy and overlooking to neighbouring premises. It appears that the existing building has full basement and ground floor coverage and the proposal may well improve the situation for neighbouring residential windows, however this will need to be assessed at the time of the application. A daylight/sunlight study should be submitted with any application showing the impact on nearby residential units.

It appears that there could be potential overlooking issues from the proposed first floor terrace onto existing residential windows at 57 Chalton Street. If this is the case the proposed terrace should be set back at this boundary to prevent any overlooking.

Design

Mention was made at the meeting that there were properties on Churchway which were listed buildings. I have double checked our records and can confirm that numbers 62-66 Churchway are not listed buildings and the nearest buildings

to the site which are listed are located on the eastern side of Chalton Street. I can also confirm that the site is not within a conservation area.

With regard to the proposed height and the two options discussed at our meeting it is considered that on the Chalton Street elevation one additional storey would be the maximum that would be accepted, using the existing parapet line as a guide (as shown to on option 2). It is acknowledged that the building at number 57 is of a distinctive design and is taller than the nearby properties, as are the buildings at 39-43 further south. One additional storey with option 2 is however, considered to be the maximum acceptable because the parapet level and single storey mansards is a strong distinctive feature and the predominant height at this part of the street that sets the context for the application site.

With regard to the Churchway elevation it is considered that the approach taken in option 1 would be the most appropriate, however as the building is located at a break in the adjacent 3 storey terrace and 5 storey mansion block the mansion block should not be taken as the context for the proposed height. Two additional storeys are therefore considered to be the maximum acceptable. Because this elevation is visible along much of Doric Way the building the upper floor of the building should be set back away from the side elevation with number 62 so as not to be visible in longer views to the west.

With regard to the two options and the approach to the design of the elevations it is considered that to the Chalton Street elevation the approach taken in option 2 of having a similar fenestration pattern to numbers 45-51 is the correct approach. This option does not however, have to become a pastiche of these properties and modern window designs for example could be acceptable.

The modern approach taken in option 1 to the Churchway elevation appears acceptable, however there appears to be scope to incorporate more interest in this elevation than is currently shown on the 3d drawings (with gables for example).

To the Chalton Street elevation lightwells with railings appear to be present at numbers 61, 65, 67 and 69, with forecourt railings present at 63, 73-85. They are not present to the south of the street and are only characteristic of the street around the junction with the pedestrianised part of Churchway. The existing lightwells appear to be at properties with residential or office use to the ground floor and not any retail units. CPG1 (design) states in section 7.12 that the creation of open lightwells with railings in front of a shopfront is not generally acceptable as it prevents window shopping and disrupts the building's relationship to the rhythm of the street. It is therefore considered that a lightwell in front of the proposed shop unit is likely to be unacceptable.

CPG1 (design) states in section 6.25 that the excavation of lightwells as a means of providing access to basements where this does not form part of the historical means of access to these areas will be resisted. To the Churchway elevation there do not appear to be any existing lightwells or pavement lights except for two inset lightwells to the building at the western corner of Drummond Crescent and Doric Way. These are the exception and it is therefore considered that lightwells to this elevation would be incongruous in the streetscene and are unlikely to be acceptable.

Transport

Developments over 1000sqm require the submission of a transport assessment with any planning application. A draft travel plan is also required to be submitted and this will be secured with a S106 legal agreement. This should cover employees and visitors to the site.

It is understood that no car parking is currently provided on site and that none is proposed. This is to be welcomed given the site's highly accessible location within Central London. The development should be secured as being car free with a S106 legal agreement.

The construction of the proposed development is likely to comprise a significant amount of works. The applicant will therefore be required to submit a Construction Management Plan (CMP) in support of the planning application. The implementation of the CMP will be secured by means of the Section 106 Agreement.

A Servicing Management Plan will be required to be submitted with any application for the hotel use and this will be secured with a S106 legal agreement.

The applicant may also be required to make a Section 106 contribution towards the provision of Crossrail, in line with the Mayor of London's Supplementary Planning Guidance (July 2010). The Mayor's SPG states that contributions should be sought for all office, retail and hotel developments within the Central London Contribution Area, the extent of which is set out in Annex 1 of the SPG. The contribution will be £60 per square metre. There is a 20% discount until 31 March 2013, which reduces the contribution to £46,080. The guidance states that the Council should be collecting the payment on behalf of the Mayor and that it is payable on the commencement of development.

In order to mitigate any damage to the highway caused during construction, the applicant will be required to make a Section 106 contribution towards repairing the footway and carriageway around the site.

Developments over 1,000sqm will be required to make a Section 106 contribution towards pedestrian, cycle, and environmental improvements in the wider area, due to the increase in activity associated with the proposed development.

Cycle storage needs to be shown on plan and should be provided in line with policy DP27 and appendix 2 of the Development Policies with 1 space per 500sqm for hotel staff and customers from a threshold of 500sqm.

There is an embargo on any construction traffic during the period of the Olympic Games and Paralympic Games in Summer 2012 as Euston Road forms part of the Olympic Route Network. This would include the week before and after the events. We would look for this to be covered within the Construction Management Plan.

Please find enclosed the weblink for the relevant CPG's. CPG7 and CPG8 are both useful references in terms of transport matters but the other CPGs will also be useful for this development.

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

Sustainability

The applicants should be made aware of the need to meet a minimum very good rating using the BREEAM assessment. Camden's CPG also goes beyond the minimum very good score in requiring a minimum 60% score in the energy and water categories, and a minimum 40% score in the materials category. Any shortfall should be justified outlining the particular restraints responsible. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as a legal agreement of any approval.

Developments over 1,000sqm (including change of use) must include provision

renewable energy on site. In line with the requirements of the London Plan, this policy has specified that new developments should aspire to meet a 20% target. The applicant should make sure they have followed the Mayors energy hierarchy (1. use less energy, 2. use renewable energy and 3. supply energy efficiently) to show that renewable energy is not just an 'add-on'.

Developments which fall within 1km of an existing decentralised energy network should assess the feasibility of connecting to that network. Please see CPG3 (sustainability) for further information on this <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

Policy DP22 seeks to ensure that new development incorporates green and brown roofs wherever suitable. The use of green/brown roofs may be viable on his site, and the applicants would be well advised to explore his, on the basis hat a brown roof using aggregates from the site would be preferable

Water run-off and attenuation - Although this may be included in any BREEAM assessment, the applicants should make provision for water run-off attenuation measures.

Access

I attach a copy of two relevant BSI documents (PAS 88:2008 and BS 8300:2009+A1:2010) and have received the following detailed comments from Karen Ross (Access Officer):

- As a new mixed use proposal (retail and hotel) the buildings will be required comply fully with Approved Document M of the Building Regulations. Planning policy DP6 will also require 10% of rooms to be suitable for or easily adaptable for wheelchair users (6). Building Control will require 1 per 20 bedrooms to be fitted out from the outset (3). In practice this can be provided with 5% fully fitted out from the outset and 5% to be easily adaptable in the future.
- The D&AS has some information regarding the facilities that will be provided for disabled people and that there will be a new lift as well as stairs suitable for ambulant disabled people. Mention is also made of Approved Document M of the Building Regulations which this proposal will need to fully comply with. Will the proposed new lift be suitable for use in an evacuation situation particularly as all the accessible bedrooms are above ground level and there are guest facilities in the basement?
- There are no wheelchair accessible bedrooms indicated on the drawings – this should be reviewed and 6 identified and designed appropriately
- Good practice guidance recommends that substantially glazed panels should bear markings (manifestations) for safety and visibility. It is recommended that these manifestations are provided at two levels i.e. at 1400 – 1600mm above finished floor level (affl) and 850 – 1000mm affl. Manifestations should be two-tone to be visible against a variety of backgrounds and lighting conditions. The use of company logos, signs or decorative features can be considered.
- All the proposed guest facilities should be fully accessible e.g. courtyard, seating areas. Good practice guidance recommends that a mixture of seating should be provided, some with arms which make it easier for some disabled and elderly people to push themselves up and out of the chair.
- Good practice guidance and the Building Regulations suggest that doors in frequent use should have vision panels with the minimum zone of visibility between 500mm and 1500mm from the floor. If there is a middle section in the door (e.g. for door furniture) there should be two viewing

panels, one with a zone of visibility between 500mm – 800mm from the floor and the second between 1150mm and 1500mm from the floor.

- The proposed reception area will need to comply with ADM which also requires that hearing enhancement systems should be provided at service counters i.e. reception and in all or any meeting rooms to assist people who are hearing impaired and who may have difficulty communicating when there are high levels of background noise (particularly where hard flooring is laid).
- I note the provision of what appear to be accessible WC facilities – the applicant should note that all those shown are left hand transfer facilities. As the most common requirement is for right hand transfer this should be provided in the one near reception with alternate handings on other floors.

Sustainability

The applicants should be made aware of the need to meet a minimum very good rating using the BREEAM assessment. Camden's CPG also goes beyond the minimum very good score in requiring a minimum 60% score in the energy and water categories, and a minimum 40% score in the materials category. Any shortfall should be justified outlining the particular restraints responsible. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as a legal agreement of any approval.

Developments over 1,000sqm (including change of use) must include provision renewable energy on site. In line with the requirements of the London Plan, this policy has specified that new developments should aspire to meet a 20% target. The applicant should make sure they have followed the Mayors energy hierarchy (1. use less energy, 2. use renewable energy and 3. supply energy efficiently) to show that renewable energy is not just an 'add-on'.

Policy DP22 seeks to ensure that new development incorporates green and brown roofs wherever suitable. The use of green/brown roofs may be viable on this site, and the applicants would be well advised to explore this, on the basis that a brown roof using aggregates from the site would be preferable

Water run-off and attenuation - Although this may be included in any BREEAM assessment, the applicants should make provision for water run-off attenuation measures.

Basement

It is not clear if there is an existing basement at the property of the size shown on the proposed plans. If there is any excavation proposed on site Policies DP23 and DP27 are relevant and a basement impact assessment may be required. Further information can be found in CPG 4 (basements) at the following link: <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

Crime prevention

Given the site's Central London location you are advised to refer to section 9 of CPG 1 (design) to ensure that the design of the development would not exacerbate any existing problems in the area. It would need to be demonstrated with any application that issues such as "designing out crime" and secure by design are integral within the development. A crime prevention statement should therefore be submitted with any planning application.

Building Control

New technical guidance came into force in April 2010 regarding Sanitation, hot water safety and water efficiency and in September 2010 regarding energy efficiency and ventilation.

Building Control can now also set their own fee's and issue warranties. On a job such as this the BC fee would show a saving of over 50% when compared to last years fees. BC will happily provide a fee quote if requested to do so.

Building Control could offer in house mechanical, electrical, structural and access advice and a flexible site inspection regime based on the close proximity of the proposed works to the Council offices.

This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact n **020 7974**
Thank you for using Camden's pre-application advice service.

Yours sincerely

Amanda Peck
Principal Planning Officer

<h2 style="margin: 0;">Pre-application meeting report</h2>	
Applicant name and address	Site address
Georgina Holden Divine Ideas (UK) Ltd 7a High Street Wanstead London	53-55 Chalton Street and 60 Churchway London NW1 1HY
Meeting date	Case Ref
31 August 2011	CA12011enq03416
Proposals	
Pre application – redevelopment to provide 5 storey buildings on Chalton Street and Churchway with 63 room hotel and 72sqm retail floorspace on Chalton Street	
Lead officer for Camden	
Amanda Peck – Development Control	
Other Camden officers attending	
Steve Cardno – Principle Transport Planner Karen Ross – Access officer	
Applicant(s)/Agent(s) attending	
Georgina Holden – architect David Cunningham – architect Vijay Patel – site owner	
Planning Obligations under Section 106 of the Town and Country Planning Act 1990	
Following our preliminary assessment of your proposal, if you submit a planning application which addresses outstanding issues detailed in this report satisfactorily, officers would only consider recommending the application for approval subject to completion of a Section 106 agreement covering the following head(s) of terms. See notes at appendix A	
Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its compliance	✓
Affordable Housing	X
Public Open Space Contributions	X
Education Facilities and Contributions	X
Healthcare Facilities and Contributions	X
Car Free or Car Capped Housing	✓
Highways works	✓
Public Transport Improvements	✓ (crossrail)
Green Travel Plan	✓
Service Management Plan	✓

Construction Management Plan	✓
Community Safety	✓
Town Centre Management	X
Sustainability Plan (BREEAM/Code for SH)	✓
Energy Plan	✓
Social and community facilities/community cohesion	X
Local employment (e.g. construction jobs recruitment, training and employment contribution)	✓
Local procurement	✓
Public Art	X
Phasing	X
Other (specify)	X

Supporting Statements and other information required for a valid application (see also attached Appendixes Guide to Submitting a Valid Application)	
To submit a valid planning application you will need to provide all the information and plans set out in the attachment to this letter. In addition, you should submit the following statements, showing how far your proposal meets Camden's policies and guidance (see attached guidance notes for further information):	
Design and Access statement (including 'lifetime homes', crime impact and wheelchair housing)	✓
Affordable housing statement (including Viability assessment if less than 50% affordable housing is proposed)	X
Air Quality assessment	X
Archaeological assessment	X
Contamination report	X
Construction Management Plan	✓
Daylight/sunlight assessment	✓
Development phasing plan	X
Ecological survey	X
Energy/renewable energy statement	✓
Environmental Statement/ Impact Assessment	X
Floorspace Schedule (including full break down of residential mix by number of bedrooms and tenure)	✓
Light impact statement	X
Listed building/Conservation Area/Historic Gardens appraisal	X
Noise Impact assessment (e.g. Acoustic report for plant)	X
Photographs/photomontages	✓
Planning Statement	✓
PPG15 Justification (for demolition in CA)	X
PPG24 Noise Assessment (for externally transmitted noise e.g. from main road)	X
Public Open space assessment	X
Regeneration/Community facilities assessment	X
Retail impact assessment	X
Service Management Plan (including waste storage/removal)	✓
Strategic views assessment	X
Sustainability Statement (including BREEAM/CSH Pre-assessment)	✓

Transport Statement (OR full TA) –accompanied by Travel Plan and Parking Management Plan if appropriate	✓
Tree Survey/ Arboricultural statement	X
Water environment impact statement (water table and/or flooding matters)	X
Other (specify)	✓ (base ment impact assessment if applicable)

What else needs to be done before submission

Your application **MUST** include the following:

- 1 Original and 9 copies of the completed planning application forms, signed and dated
- 1 Original and 9 copies of the completed signed and dated Ownership Certificate (A, B, C or D) & Article 7 Certificate (Agricultural Holdings)
- If applicable, details of any assistance or advice sought from a planning officer prior to submitting your application – please indicate dates of any correspondence or discussion and name of officer
- 1 Original and 9 copies of the location plan (ordnance Survey based), at a scale of 1:1250 or 1:2500 or larger) or at an appropriate scale to show at least two main roads and surrounding buildings and should show the direction of North.
- The application site should be edged clearly with a red line and a blue line must be drawn around any other land owned by the applicant
- The correct fee
- 10-copies of the block plan of the site to a scale of not less than 1:500
- 10 copies of the existing and proposed elevations to a scale of not less than 1:100
- 10 copies of existing and proposed sections and finished floor levels at a scale of not less than 1:100
- 10 copies of existing and proposed floor plans at a scale of not less than 1:100
- 10 copies a site survey plan to a scale of not less than 1:200 showing existing features of the site e.g. walls, trees, buildings and other structures.
- 10 copies of a site survey plan at scale of not less than 1:200 showing proposed features e.g. landscaping.

Consultation

You are strongly advised to make early contact with the following organisations/groups

- Crime Prevention Design Adviser, Metropolitan Police Service (Contact Terry Cocks/Adam Lindsay 020 87336323)

It would be helpful as part of your submission if you could set out what public consultation you have carried out, what comments have been received and how your proposal has been amended in response to such comments

Further guidance for the submission of a major application

You are advised to have regard to the following attachments in this report with regard to the submission of your application

APPENDIX A – VALIDATION CHECKLIST
 APPENDIX B – ADDITIONAL INFORMATION FOR MAJOR APPLICATIONS
 APPENDIX C – SECTION 106 AGREEMENTS
 APPENDIX D – GUIDANCE NOTES ON SUBMITTING ELECTRONIC FILES

DRAWING SCHEDULE – To be attached to all documentation associated with the application form.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries in relation to the above matters do not hesitate to contact me.

Signature _____ Date of Report: _____
 Name _____
 Designation _____