

Delegated Report		Analysis sheet		Expiry Date:	03/12/2015
		N/A / attached		Consultation Expiry Date:	09/10/2015
Officer			Application Number(s)		
Fergus Freaney			2015/5015/P		
Application Address			Drawing Numbers		
55 Chalton Street & 60 Churchway London NW1 1HY			See decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Demolition of existing building (C3 and A1 Use Class) and redevelopment comprising 5-storey, 56 room hotel (C1 Use Class) fronting Chalton Street and Churchway.					
Recommendation(s):		Refuse Planning Permission			
Application Type:		Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	61	No. of responses	02	No. of objections	02
			No. electronic	00		
Summary of consultation responses:	<p>Site notice: 18/09/2015 – 09/10/2015 AO letters: 16/09/2015 – 07/10/2015</p> <p>2 objections in total, (1 objection from resident of Seymour House and 1 from resident of Churchway), summarised as follows:</p> <ul style="list-style-type: none"> - The hotel would cause disruption when tourists arrive in cars and use the limited parking available in the area. The controlled parking zone does not cover after 18:30 in the evenings or weekends at all. - Sunlight/Daylight report omits a number of properties on Churchway – 62, 64, 66 and 68 Churchway. The report does not include an assessment of the sunlight/daylight/privacy for these properties. - The report only takes into account the individual impacts of the proposal at 55 Chalcot Street/60 Churchway and the other application at 70 Churchway. The report does not take into account the combined impact. - There is no consideration on the impact on rubbish, sewage and other waste handling. - Increased disturbance and noise. 					
CAAC/Local groups* comments: *Please Specify	No CAAC or local groups.					

Site Description

The site is located on the west side of Chalton Street, linking through to the east side of Churchway. It currently comprises a 3 storey building fronting Chalton Street, containing a small supermarket at ground floor and 2x flats above. Fronting Churchway is a 2 storey building containing a service entrance for the supermarket and a flat above.

The site is not listed and is not within a conservation area. It is within a designated neighbourhood centre.

Relevant History

2007/5986/P - Retention of ATM (Automated Teller Machine) in shopfront. *Granted 14/07/2008*

Concurrent applications

2015/5041/P - Demolition of existing building (C3 residential Use Class) and erection of 4 storey building plus basement, comprising 4x Residential units (3x2 bed & 1x1bed unit) (C3 Use Class) in association with neighbouring redevelopment at 55 Chalton St & 60 Churchway (ref: 2015/5015/P). *Decision pending*

Relevant policies

LDF Core Strategy and Development Policies

- CS1 – Distribution of growth
- CS5 – Managing the impact of growth and development
- CS6 – Providing Quality Homes
- CS7 – Promoting Camden's Centres and Shops
- CS8 – Promoting a successful and inclusive Camden economy
- CS11 – Promoting sustainable and efficient travel
- CS13 – Tackling climate change through promoting higher environmental standards
- CS14 – Promoting high quality places and conserving our heritage
- CS16 – Improving Camden's health and wellbeing
- CS17 – Making Camden a Safer Place
- CS18 - Dealing with our waste and encouraging recycling
- CS19- Delivering and monitoring the Core Strategy

- DP1 Mixed use development
- DP2 Making full use of Camden's capacity for housing
- DP5 Homes of different sizes
- DP6 Lifetime homes and wheelchair homes
- DP10 Helping and promoting small and independent shops
- DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- DP13 Employment sites and premises
- DP14 Tourism development and visitor accommodation
- DP15 Community and leisure uses
- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP19 Managing the impact of parking
- DP20 Movement of goods and materials
- DP12 Development Connecting to the highway network
- DP22 Promoting sustainable design and construction
- DP23 Water
- DP24 Securing high quality design

DP27 Basements and Lightwells

DP28 Noise and vibration

Camden Planning Guidance

CPG1: Design

CPG2: Housing

CPG3: Sustainability

CPG4: Basements and Lightwells

CPG5: Town centres, retail and employment

CPG6: Amenity

CPG7: Transport

CPG8: Planning obligations

NPPF

London Plan 2015 (consolidated with amendments from 2011)

Assessment

Proposal:

Permission is sought for the redevelopment of the site to demolish the existing buildings and erect a 56 room hotel, with a 5 storey element fronting Chalton Street and a 3 to 5 storey element fronting Churchway.

It is proposed that the existing 3x flats on site would be re-provided in a newly constructed residential block at 70 Churchway, subject to a concurrent application under reference 2015/5041/P.

The main planning considerations for this application are:

- Land use
- Design
- Amenity
- Transport
- Sustainability
- Public open space
-

Land use

Proposed Hotel use

The site is currently in use as a small supermarket at ground floor on Chalton Street (A1 Use Class) with residential above.

Policy DP14 supports the introduction of new large scale tourism development in Central London but also supports tourism accommodation in areas which are highly accessible by public transport and do not harm amenity, environment or transport systems. The Policy also specifically states that tourism development must not harm the balance and mix of uses in the area.

The site has a PTAL rating of 6b (the best possible score) and is ideally located within walking distance of King's Cross St Pancras International, Euston Station and multiple bus routes. Although not within the formally designated 'Central Activity Zone' it is less than 2mins walk from the boundary and it is within a neighbourhood centre which is partly within the Central Activity Zone. As such it reads as a natural extension to Central London.

The site would also front onto Churchway, which is a quiet, mainly residential street. 60 Churchway is

adjacent to a group of buildings which appear to have once had shops at ground floor level as the corbelling and some fascia detailing remains.

The hotel would have their means of escape onto Churchway and a number of rooms would also front onto the street. Subject to design the principle of a hotel in this location is considered to be compatible with the residential use.

Therefore the principle of a hotel in this location is considered to be acceptable, provided it does not harm the balance and mix of uses in the area, is an appropriate design and does not harm the amenity of adjoining neighbours.

Loss of Retail use

Policies CS7 of the Core Strategy and DP12 of the Development Policies states that the Council will apply a sequential approach to retail and neighbourhood centres, providing for, and maintaining, a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice. DP12 focuses on the effect of non-retail development on shopping provision and the character of Camden's retail centres. Resisting the loss of shops where this would cause harm to the character and function of a centre or shopping provision in the local area.

The site is located within a neighbourhood centre providing people's day to day needs. As a guide Camden would resist schemes that result in less than 50% of ground floor premises being in retail use or more than three consecutive premises being in non-retail use. The proposed change from A1 to C1 Hotel would result in 3 consecutive premises being non-retail and would also result in less than 50% below A1 retail in the parade. Based on the Council's informal retail survey 2015, of the 21 existing units/former units, 5x are A1 Use Class (retail), 5x are B1 Use Class (office), 3x are C3 Use Class (residential); 2x are A2 Use Class (professional services), 1x is an A3 Use Class (restaurant), 1x is a gallery (Sui Generis), 4x are unknown.

Policy DP12 goes on to state that The Council will not grant planning permission for development that it considers would cause harm to the character, amenity, function, vitality and viability of a centre or local area. We consider that harm is caused when an impact is at an unacceptable level, in terms of trade/turnover; vitality and viability; the character, quality and attractiveness of a centre; levels of vacancy; crime and anti-social behaviour, the range of services provided; and a centre's character and role in the social and economic life of the local community. We will consider the cumulative impact of non-shopping uses on the character of the area.

As there is already severe deficiency in A1 retail space in this neighbourhood centre any further erosion is considered to cause harm to the character, amenity, function, vitality and viability of the centre and wider local area. The retail unit is currently a small supermarket which is considered to provide a valuable function to the local community as there are limited options for affordable food shopping in the local area. The loss of the existing A1 retail unit would result in the loss of an active street frontage causing harm to the character and vitality of the area and would reduce the number of facilities available for residents in the neighbourhood centre.

Whilst it is acknowledged that hotel guests may use the remaining facilities within the centre, which consist predominantly of café/restaurant type uses, the loss of the existing A1 retail unit for the reasons outlined above would adversely impact on the function and character of the neighbourhood centre.

Camden Council seeks to promote A1 retail shops and functions but recognises that "where a planning application proposes the loss of a shop in retail use, we will consider whether there is a realistic prospect of such use continuing. We may require the submission of evidence to show that there is no realistic prospect of demand to use a site for continued retail use" (section 2.9 of CPG5).

The supermarket is still in use and multiple site visits indicate a regular flow of customers and therefore there is no evidence that the existing use is no longer viable.

The loss of retail floorspace is considered to be harmful to the character, amenity, function, vitality and viability of the centre contrary to Council policy and guidance.

Loss of Residential

At present the site consists of 2x3bed residential duplex flats at first and second floor level fronting Chalton Street and 1x2bed flat fronting Churchway. There is a concurrent application at 70 Churchway (2015/5041/P) which would seek to address the loss of units at the application site by re-providing them in a newly constructed apartment block at this nearby site. If this were considered a suitable solution to the loss at the application site, this re-provision would need to be secured by a legal agreement.

Housing is regarded as the priority land-use of the Local Development Framework, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. Policy DP2 states that the Council will seek to minimise the loss of housing in the borough by protecting residential uses from development that would involve a net loss of residential floorspace and resisting development which involves the net loss of two or more homes. Policy DP2 does state that in some circumstances, it may be appropriate for residential floorspace to be re-provided on an alternative site.

The scheme would result in the net loss of 3x units on site. Whilst it is acknowledged that a proposal exists for new residential development on a neighbouring site as referenced above, there is no mechanism in place to secure a re-provision of the lost residential floorspace as a result of this application. Notwithstanding this, the proposal at 70 Churchway is a separate application and must be considered on its merits in accordance with the development plan.

Furthermore, DP2 seeks to protect residential floorspace (not just unit numbers). If overall floorspace is considered, the existing residential floorspace across all sites (including the existing self-contained residential unit at 70 Churchway) is approx. 354sqm. The proposed residential floorspace at 70 Churchway would be 290sqm thus representing a net loss of residential floorspace contrary to the requirements of policy DP2.

Policy DP2 only allows for the net loss of 2 or more units where the development creates a large home in a part of the borough with a relatively low proportion of large dwellings; or, to enable sub-standard units to be enlarged to meet residential space standards; or to enable existing affordable homes to be adapted to provide the affordable dwelling sizes that are most needed. The existing units appear of a good size and no evidence has been provided to demonstrate they are of substandard quality, or that it would be uneconomical to make them acceptable.

Mixed Use

Policy DP1 advises that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. The Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area.

Inclusion of secondary uses as part of a mixed use development offers the best prospect for creating a complementary range of activities across an area with continuous activity and natural surveillance. However, where a secondary use is appropriate for the area and cannot practically be achieved on

the site, the Council may accept an off-site contribution to secondary uses in the same area, directly related in scale and kind to the development proposed, and secured by means of a planning obligation.

DP1 states that the Council will take, amongst other things, the following into account when considering whether a mix of uses should be sought, whether it can be practically achieved on the site, the most appropriate mix of uses and the scale and nature of any contribution to the supply of housing and other secondary uses:

- The character of the development, the site and the area;
- Site size, the extent of the additional floorspace and constraints on including a mix of uses;
- The need for an active street frontage and natural surveillance;
- The economics and financial viability of the development including any particular costs associated with it;
- Whether secondary uses would be incompatible with the character of the primary use;

When assessed against the criteria set out above, the proposed development fails to address the relevant points. The character of the neighbourhood centre is generally one of mixed uses, with retail and active street frontages at ground floor level and residential or business above.

As the proposed development is over 1000sqm the development should include secondary uses on site, which could include retail or housing. The proposal would be for the sole provision of a hotel on site, with no justification provided as to why secondary uses could not be incorporated.

Furthermore it is not considered that secondary uses would be incompatible with the character of the primary use as a hotel, and it is not uncommon for hotels to be located where there are a range of other uses within the main building and surrounding it. Retaining A1 Use Class (retail) at ground floor level is considered to be compatible with the proposed hotel use and the most appropriate secondary use as part of a hotel led mixed use scheme to meet the requirements of mixed use policy DP1. The loss of the retail use would be contrary to policy DP1 and CPG5 in that it reduces an active street frontage and natural surveillance in a neighbourhood centre which is appropriate for retail development. This is in addition to the concerns outlined above with regard to the loss of retail space.

Affordable housing

On sites within the central London area or in large town centres; or where developments involve the addition of 10 or more homes (or 1000+sqm of residential floorspace) the council would expect a contribution toward affordable housing.

As the scheme is not within the central London area and is not proposing 1000+sqm of residential floorspace an affordable housing contribution is not required.

Land use summary

The principle of a hotel in this location is broadly considered to be acceptable; however, the scheme as proposed fails to address a number of key issues.

The scheme fails to provide an appropriate mix of uses on site, contrary to policy DP1. Furthermore the scheme would result in the net loss of more than 2 residential units with insufficient re-provision of housing off-site contrary to policies DP1 and DP2.

The proposed loss of retail space would result in the loss of an active street frontage and cause harm to the character, amenity, function, vitality and viability of the neighbourhood centre contrary to policy

DP12.

Design

The site is long and narrow shape, slightly kinked in plan form, linking Chalton Street to the east and Churchway to the west. Although none of the site is situated in a conservation area, the surrounding townscape is of a reasonably high quality. The plot widths are generally quite narrow, reflecting the small-scale urban grain of much of the area, particularly as found on the west side of Chalton Street and the east side of Churchway. Building heights vary but tend not to exceed 4 to 5 storeys, with many buildings of 3 storeys. Some buildings are of architectural and historic interest, reflected by their status as statutory listed buildings (such as Levita House, a Council-owned housing estate on the east side of Chalton Street). The quality of others has recently been recognised by their inclusion in Camden's Local List, including the adjacent building at No 57 Chalton Street and the adjacent housing blocks, Seymour and Winsham, in Churchway, plus No 66 Churchway.

The proposal is to create a full-depth building on the site, spanning Chalton Street and Churchway, and rising to a maximum of five storeys above ground. The building will occupy the full footprint of the site at basement and ground floor levels, with the upper floors concentrating on two blocks facing the two streets. This allows for a breathing space in the middle of the site, reflecting the pattern of development on adjacent plots, including the communal gardens to the rear of the Seymour and Winsham housing blocks. The height and bulk arising from this design and layout is generally acceptable, although there are some concerns regarding the resultant form and how this interacts with adjacent buildings.

In particular, concerns are raised regarding the southern section of the Chalton Street roofline. On Chalton Street the northernmost section of the block takes the height and form of the adjacent locally listed five-storey building at No 57, employing a gable feature on the front façade. Whilst there is no in principle objection to this approach the proposed design does not complement the existing neighbouring locally listed building or the wider streetscene in terms of detailed design and material.

The southern section of this street frontage has a boxy and abrupt appearance, which appears to have been designed to 'bridge' the taller element of the building with the lower buildings to the immediate south facing Chalton Street. However, as an overall composition, this element detracts from the gable end giving the street frontage a clumsy appearance at roof level. Furthermore, this element is likely to be visible in long views along Chalton Street, particularly from the opposite side of the street some distance south of the site.

The treatment of the Chalton Street façade in terms of cladding and detailed design also raises significant concerns. The proposed use of rainscreen cladding, in an apparently white colour, resulting in a slightly haphazard pattern of panels, is not considered to be sympathetic to the context. These panels fail to complement the varied textures, colours, patterns and materials of the masonry façade of No 57 as well as other surface finishes in the row of buildings either side of the site. Also, the resultant scale is out-of-keeping with the established architecture of the surroundings. The overall design fails to articulate the two elements of the proposed front elevation: the northern gable element and the lower southern section. The employment of a darker material at ground floor level and rising vertically up the southern section of the building is also questioned in architecture and urban design terms and it appears to perform no function in properly articulating the building.

Furthermore, the fenestration pattern, which is ad hoc, fails to have any order or logic behind it and does not respect the existing pattern of the wider group of buildings. At ground floor level, the high level windows in the northern section do not contribute to an active street frontage and the entrance door in the southern half is subdivided in an inelegant way by mullions and transoms. The inclusion of a balcony at parapet level is also unacceptable, as there is little precedent in this section of the street for such a feature and as such would appear out of keeping with the established character and

appearance of buildings in the locality.

The development on the Churchway frontage is also divided into two elements: on the southern side a taller red brick block which is a similar height to the adjacent Seymour and Winsham blocks and which appears to pick up on their height and bulk, and on the northern side a lower block employing white rainscreen panels which takes on a similar form and height to the 19th century buildings immediately to its north including No 66 Churchway. Concerns are raised that the southern section of this block blends too much with the Winsham, detracting from its overall form, including its northern flank and pitched roof, by submerging it; the height and bulk of this section of the development does not integrate appropriately with the neighbouring residential block. The full-height bay window integrates reasonably well into the design, but the overall scale, bulk and form of this part of the buildin are considered to be unacceptable.

As with the gable end facing Chalton Street, there is no in-principle objection to the overall height, bulk and form of northern section of the Churchway development (which attempts to mimic the terrace to the north). However, use of rainscreen panels in this section of the development and the resultant unsympathetic architectural treatment which relates poorly to surrounding historic buildings is unacceptable.

Furthermore, the ground floor element of the Chuchway elevation would lack animation and articulation. The scheme would present a hotel room at ground floor level and emergency exit within the side return. Given that the site design attempts to mimic buildings which would have had active street frontages, and retain corbels and fascias, a more active street frontage should be incorporated.

Both the Chalton Street Elevation and Churchway elevation are not considered to successfully relate to the street scene, the neighbouring buildings or surrounding locally listed buildings. Although an attempt has been made to mimic adjoining buildings, the scheme is let down by poor detailed design and materials, and poorly considered interactions with adjoining buildings – in the case of the bulky rooftop design at the Chalton Street element and the extension to the side of the Winsham building on Churchway.

The ground floor elevations on both sides of the development fail to successfully create active frontages to the detriment of the street scene. Furthermore the proposed materials, particularly the proposed cladding is of an insufficient quality and would appear out of keeping and incongruous in the wider area.

The scheme, as currently designed, is considered to detract from the setting of adjacent locally listed buildings whilst the proposed materials and detailed design are of an insufficient quality thereby adversely impacting on the historic townscape.

Amenity

Policy DP26 of the LDF and supplementary advice set out in CPG6 seeks to ensure that proposals protect the amenity of neighbouring occupiers with regards to loss of privacy, daylight/sunlight or increased sense of enclosure.

The footprint of the existing buildings would remain the same, with the height at both the Chalton Street and Churchway sides of the site increasing in height, with a 2 storey element connecting the two. This broadly echoes the existing form. In terms of privacy it is not considered that there would be any significant impact. The existing built form is that of a block of higher buildings lining the perimeter and backing onto an area of low rise structures or raised amenity spaces. There is significant overlooking possible from all the existing windows and the proposed hotel is not considered to exacerbate this.

A sunlight/daylight report has been submitted which indicates that there would be minimal impact on properties from 57 Chalton Street to 70 Churchway (roughly an arc from northeast of the site to directly north of the site), however the report fails to take into account properties from 62 to 68 Churchway (the arc from directly north of the site to roughly north west).

These properties have potential to be shaded by the 5 storey element attached to Winsham House and therefore should be included in any sunlight/daylight assessment. Without an adequate assessment of sunlight/daylight levels in properties at 62 to 68 Churchway the proposal is unacceptable.

Given the tight built-up nature to the rear of this group of buildings and that all would appear to have windows facing the street, it is not considered that outlook will be so severely impacted as to be unacceptable.

No external mechanical ventilation or plant is proposed; as such noise will not be an issue in this respect.

Any hotel scheme on this site, in view of its proximity to neighbouring residential dwellings would need to be subject to a Hotel Management Plan. This would be secured by a section 106 agreement and would include details regarding on-site management, cleaning/maintenance, security, and other matters. The plan would also include a designated community contact to be provided in order that any issues affecting local residents can be dealt with in an efficient manner and to ensure there is a point of reference if local residents wish to raise any issues.

Transport

The site has a PTAL rating of 6b with excellent transport links very close by, it is expected that the majority of guests would arrive by public transport. It is not considered that the proposed 56 room hotel would result in a harmful impact on the public transport network.

In order to ensure the highway and pedestrian network and the amenity of neighbours is not unduly impacted upon during construction a construction management plan will be required, in the absence of a s106 agreement for this the proposal is unacceptable.

The scheme proposes 6 visitor cycle spaces on the public highway on Churchway and 3 long term spaces for staff within the building. Given the site constraints it is considered acceptable for visitor parking to be located on the street, were the scheme acceptable in all other respects an agreement between the Councils highways team would need to be entered into to cover the cost of installation.

The proposed 3x internal cycle parking spaces are unacceptable as they are hook and hang types. The only acceptable cycle parking type are Josta, Sheffield or Camden stands, to accord with CPG7: Transport. These spaces would also need to be covered and secure. In the absence of appropriate staff cycle parking the application is unacceptable in this respect.

The applicant would also be required to cover the cost of repairing any damage done to the highways network during construction, this would need to be secured by way of a s106 legal agreement. In the absence of such an agreement the development is unacceptable.

Sustainability

Policy DP22 (e) expects non-domestic developments of more than 500 sqm floorspace to achieve "very good" in BREEAM assessments. CPG3 (Sustainability) goes into more detail on each sub-category within the BREEAM assessment, and expects a minimum score of 60% in the energy category, 60% in the water category, and 40% in the materials category.

In this case the applicants' pre-assessment suggests that a 'Very Good' score of 56.4% can be achieved. The energy category has a score of 63.6%, the water category 62.5% and the materials category 50%. All of which comply with Policy DP22.

The London Plan states that proposals make the fullest contribution to minimising CO2 emissions in accordance with a Be Lean (use less energy), Be clean (supply energy efficiency) and Be Green (use renewable energy) hierarchy. Furthermore a reduction of at least 35% CO2 emissions below the building regulations part L 2013 baseline.

The development achieves the following in the hierarchy

'Be lean' – a 16.4% decrease in CO2 emissions over Part L of the 2013 Baseline.

'Be clean' - a 35.34% decrease in CO2 emissions over Part L of the 2013 Baseline

'Be green' - As the 35% reduction has already been achieved no 'be green' measures are necessary

The scheme is therefore considered to be capable of being acceptable with regard to sustainability. Nonetheless, a sustainability plan would need to be secured by way of s106 legal agreement to ensure that the development still complies post construction. In the absence of such an agreement the development is considered to be unacceptable.

Other matters

Basement development

There is an existing basement level extending across the full width of the site, however the drawings indicate that there would be additional excavation at the Churchway side of the site. The site is within an area identified as having slope stability issues. Therefore a Basement Impact Assessment would be required in accordance with CPG4 (basements and lightwells).

In the absence of a BIA, and an independent assessment, the proposal is considered to be unacceptable due to the potential impacts on groundwater flow and structural stability of adjoining buildings and therefore does not comply with policy DP27

Employment and training contribution

The proposed hotel would have an impact on the local economy and nature of employment in the area. This should be addressed by a variety of employment and local procurement measures throughout the construction and operational phases; to include construction trade apprenticeships and hospitality industry apprenticeships within the completed development; employment plan to support recruitment from within the local area for construction and end-user jobs and to promote local procurement.

The Council encourages the creation of apprenticeships and training placements to help close the skills gap between the jobs on offer in the Borough and the skills of the local workforce. This approach is supported through policy CS8 and applies to all major commercial developments creating over 1,000sqm employment floorspace including hotels. The Council would seek a s106 contribution to support training and provide employment advice to help residents gain access to the jobs created and to support local procurement initiatives. The contribution for the hotel scheme based on the formula contained in para 8.21 of CPG8 would be £5593. The applicant would also be required to work to a target of 20% local recruitment

Large schemes of over £3 million are also required to recruit one construction apprenticeship for

every £3 million of build cost plus contribute a support fee of £1,500 per placement. Schemes of over £1m value should sign up to the Camden Local Procurement Code. Both of these would likely apply to this development and would be secured with a S106 agreement.

In the absence of a legal agreement securing training and employment advice, a target for local recruitment and construction apprenticeships the proposal is considered to be contrary to CS8.

Public open space

Policy DP31 requires proposals that generate an additional demand for public open space to make a contribution to offset the pressures the development would bring upon public open space in the area. The net increase in floorspace and additional hotel guests attracted to the area are likely to generate additional demands on available open space in the area and a contribution calculated in line with the methodology set out in CPG6 (amenity) would be sought. It is likely this would be spent on relevant public realm improvements in the area

In accordance with paragraph 11.3 of CPG6 (Amenity), the Council will expect a contribution towards public open space. This is as the development adds over 500sqm of floorspace and will increase the worker and visitor populations of the borough and demand for public open space.

The development will be expected to contribute 18sqm of open space per double room, therefore in this instance 1008sqm (18sqm x 56 double rooms) of open space would be required. Given the confined nature of the site, it is acknowledged that provision would not be possible on-site and there are no other acceptable sites nearby, therefore a contribution towards the provision of new or enhancement of existing open spaces would be required.

Following the advice set out in CPG6 (paras. 11.33 – 11.41 and appendix C), this non-residential development providing 56 double rooms would be required to contribute (per room) £593 [Capital cost], £594 [Maintenance] and £71 [Design and admin], in total a contribution of £70,448 would be required. In the absence of a s106 legal agreement securing this contribution the scheme is considered to be unacceptable due to the adverse impact on public open space provision.

Cil

The proposal would be liable for both the Mayor of London's CIL and Camden's CIL as it exceeds 100sqm.

Summary

The proposal fails to provide a suitable mix of uses on the site and results in the loss of an A1 retail unit within an existing neighbourhood centre which would have an adverse impact on its character, function and vitality contrary to policies CS7, DP1, DP10 and DP12. In addition it would result in the loss of residential floorspace without a suitable re-provision of this priority land use contrary to policy DP2.

The proposed scheme would form an incongruous addition to the row of buildings of which it would form a part, unacceptable in terms of design, the proposed material and aspects of the bulk and massing to the detriment of the surrounding scene and locally listed buildings.

Furthermore the proposal fails to address concerns raised with regards to sunlight/daylight, cycle parking or basement development. In the absence of a legal agreement for a sustainability plan, construction management plan and public open space contribution it fails to comply with DP22 (sustainability), DP20 (movement of goods and material), DP21 (Development connecting to the

highway network) and DP15 (community and Leisure uses) respectively.

Recommendation: Refuse Planning Permission.