

Delegated Report		Analysis sheet	Expiry Date:	15/03/2016
		N/A / attached	Consultation Expiry Date:	
Officer		Application Number(s)		
Zenab Haji-Ismail		2015/7007/P		
Application Address		Drawing Numbers		
89 Plender Street London NW1 0JN		<p>859_03/01/0100 P1, 859_03/01/0101 P1, 859_03/01/0219 P1, 859_03/01/0220 P1, 859_03/01/0221 P1, 859_03/01/0500 P1, 859_03/01/0501 P1, 859_03/01/0600 P1, 859_03/01/0601 P1, 859_03/01/0602 P1, 859_03/01/0603 P1, 859_03/03/0219 P1, 859_03/03/0220 P1, 859_03/03/0221 P1, 859_03/03/0222 P1, 859_03/03/0223 P1, 859_03/03/0224 P1, 859_03/03/0225 P1, 859_03/03/0226 P1, 859_03/03/0510 P1, 859_03/03/0511 P1, 859_03/03/0512 P1, 859_03/03/0513 P1, 859_03/03/0600 P1, 859_03/03/0601 P1, 859_03/03/0602 P1, 859_03/03/0603 P1, 859_03/03/0800 P1, 859_03/03/0801 P1, 859_03/03/0802 P1 and 859_03/03/0803 P1.</p> <p>Design and Access Statement Manolo & White (including Structural Report); Planning Statement CBRE, Draft Construction Management Plan draft Construction Management Transport Plan, Morgan Tucker; Draft Hotel Operators Management Statement TheWesley, Heritage Statement Heritage Collective, Daylight/Sunlight Assessment Behan Ltd, Sustainability/Energy Statement CBRE, Noise Impact Assessment CSG Acoustics, Phase 1 Preliminary Risk Assessment; and Policy DP1 Feasibility and Viability Report (redacted) The Wesley.</p>		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Internal alterations to facilitate the change of use of the lower ground floor from student accommodation (Class C2) to a place of worship and flexible worship space (Class D1), the change of use of the upper floors from worship space (Class D1) to hotel (Class C1) and the erection of a single storey roof extension to provide a 43 bedroom hotel with associated alterations to the fenestration and the main and side entrances.				
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	42	No. of responses	09	No. of objections	00
Summary of consultation responses:	<p>Letters in support of the application were received from neighbouring residents at 18 Borrowdale – Robert Street and 52 Kenbrook House- Leighton Road</p> <ul style="list-style-type: none"> • The church is in desperate need of refurbishment • Camden Town Methodist Church is just a stone's throw away from Camden High Street. The proposal would greatly benefit, and play its part in the lives of the local community, if it was given the go ahead of desperately needed refurbishment. • The church could do a lot of good work and provide a welcoming environment, which could then be accessible by mums and tots with prams, the disabled with wheelchairs and the elderly, who find it difficult at their time of life climbing steps, if a ramp was in place. 					
CAAC comments:	<p>The Camden Town CAAC has objected to the application on the following grounds</p> <ul style="list-style-type: none"> • The worship space occupying the ground and first floor levels is a fine interior with its organ and encircling gallery. Its North entrance - a five bay, elevation of two storeys and double pediment is an elegant design and certainly enhances Plender Street • Object strongly to the proposed insertion of the four floors for a proposed 'hotel'. as well as the raising of the roof which will be ugly and top heavy. • The proposed entrance door is also entirely out of keeping with the classical elevation. • The Chapel is at present completely intact but will be wrecked by the present proposal. • It is appreciated that the Chapel is in poor condition but the CAAC are concerned that the Methodist Church has not considered alternative grants • There is an unsatisfied need for public performance space in Camden Town. The present worship space and gallery in the Chapel seats 600 people and would make an ideal venue for concerts, performances and talks of every kind. • There are examples of elsewhere in London where buildings have been brought back into a viable use for example the Union Chapel in Islington which was saved some years ago and now manages to hold traditional services as well as concerts of every kind. It is enormously popular. • The Camden Town Methodist Church is not listed due to the fact that Historic England only listed Koko on Camden High Street as well as the residential terraces in 1974. They have not reviewed the area since. • The existing Chapel is locked at present which has prevented several people being able to visit its interior to comment on this proposal. 					

Site Description

The subject site comprises a two storey plus mezzanine gallery Methodist church building situated on the southern side of Plender Street and on the eastern corner with King's Terrace. The building is 3-storeys tall, with principle elevations to Plender Street and Kings Terrace. The building was constructed in 1889/90 and remains in church use, with additional ancillary community uses. The site is located within the Camden Town Centre and within the Camden Town Conservation Area. The building is identified in the Camden Town Conservation Area Appraisal and Management Strategy (CAAMS) as making a positive contribution to the area. The existing church is in a dilapidated state, the existing rear elevation is structurally unsound.

Relevant History

2012: Planning application withdrawn for internal and external alterations to existing place of worship (Class D1), including conversion of basement student accommodation (Class C2) to ancillary meeting halls (Class D1) and creation of 6 x 1-bedroom residential units (Class C3) on new first floor mezzanine level, and associated alterations to doorways and fenestration.

2002: Permission refused for "Erection of replacement 2.2m high railing and gates on front boundary."

1980: Approval granted for "Change of use of the basement from church hall to a student hostel."

Neighbouring Sites

23-27 Kings Terrace: Permission granted in October 2005 for "The erection of an additional floor for 2 x 1 bedroom self-contained residential flats"

11-19 & 23-31 Bayham Street and 8-24 Kings Terrace : 1993: Permission granted (9300539) for "Redevelopment to provide part 2- part 3-storey buildings on Kings Terrace and Bayham Street comprising 16 residential units 8 parking spaces and garden area"

Relevant policies

LDF Core Strategy and Development Policies

National Planning Policy Framework 2012 paragraphs 56 -66 and 129-141.

National Planning Policy Guidance 2016

London Plan March 2016

Mayor's Supplementary Planning Guidance 2016

Core strategy

CS1 Distribution of growth

CS2 Growth Areas

CS5 Managing the impact of growth and development

CS8 Promoting a successful and inclusive Camden economy

CS10 Supporting community facilities and services

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 well-being

CS17 Making Camden a safer place

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

Development Policies

DP1 Mixed use development

DP2 Making full use of Camden's capacity for housing

DP9 Student housing, bedsits and other housing with shared facilities

DP14 Tourism development and visitor accommodation

DP15 Community and leisure uses

DP16 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
DP21 Development connecting to the highway network
DP22 Promoting sustainable design and construction
DP24 Securing high quality design
DP25 Conserving Camden's heritage
DP26 Managing the impact of development on occupiers and neighbours
DP28 Noise and vibration
DP29 Improving access

Supplementary Planning Policies

Camden Planning Guidance (CPG) 2015 – CPG 6, 7 and 8
Camden Planning Guidance (CPG) 2013 – CPG 1, 2, 3 and 4

Camden Town Conservation Area Statement 2007

Assessment

1.0 Background

1.1 The applicant is the Camden Town Methodist Church ('CTMC'). CTMC currently has 38 confirmed members, with another 49 Adherents on the community roll compared to 103 in 1985. The lack of members on the community roll means that the Church has had issues in finding appropriate leadership for the Church, and consequently CTMC does not have the appropriate skills to manage the site meaning that the premises are slowly falling into disrepair. The current facilities are capable of holding 850 members, but CTMC has only 38 confirmed members. The existing worship space is therefore much larger than is required by the current congregation. Previously the rooms located at lower ground floor level were used to accommodate four student units. A site visit indicated these were of poor quality and due to health and safety reasons, the use ceased in 2008.

1.2 The applicant has set out that various works are required in order to ensure the long term sustainability, viability and structural stability of the church at Plender Street and to ensure that the building can fulfil a more active role in the local community. The church requires a major upgrade of its facilities in order to improve the accessibility of the premises and the suitability of the community and congregational facilities. The building is also suffering from significant structural problems, which apparently arose as a consequence of the development of the housing to the rear. A steel frame is currently supporting the rear wall of the church (which is structurally unsound).

1.3 The application sets out an intention on the part of the applicant to address four key issues through a comprehensive refurbishment:

- A revised internal layout which addresses its current failure to provide an appropriate venue for the church's ministry aspirations;
- The need to provide for wider community benefit by providing a good quality hall and meeting rooms at reasonable cost for a variety of community groups;
- The need to provide disabled access throughout; and
- The need to repair and make good the structural issues arising from the flank wall.

1.4 The applicant has stated that without significant repair, it is considered that the membership will continue to decline and it is likely that the Church will close within a decade.

1.5 In order to raise sufficient funds to enable the upgrade of the community facilities and to improve the structural stability of the building, the applicants have partnered with the Methodist International Centre (MIC) who trade as The Wesley Hotel. The Wesley will operate the proposed hotel; the building being managed by the Methodist Council on behalf of the Methodist Conference.

1.6 The proposal would include re-providing the existing church space at lower ground floor level and inserting a four storey structure suspended structure within the envelope of the building including the erection of a one and a half storey roof extension to provide a 43 room hotel. The hotel use would provide the enabling finance for the works of repair and refurbishment of the building and its retention in community use. The scheme results in a net uplift in GEA floorspace of 746 sq m.

2 Land use

Mixed Use Development

2.1 Policy DP1 sets out 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 in the town centre of Camden Town where more than 200 sq m (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be housing. The net uplift in floorspace is proposed to be 746 sqm. The proposal does not provide residential accommodation.

2.2 Policy DP1 sets out that in considering whether a mix of units should be sought and whether it can practically be achieved on the site, the Council will consider the character of the development, the size, viability and source of funding. A statement has been submitted by the applicant setting out that residential accommodation cannot be provided onsite. The Council considers that the constraints of the existing building, with a proposed hotel use it would be impractical to introduce a residential use onsite. Paragraph 1.15 sets out 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. In the absence of such an agreement the development is unacceptable.

Loss of Student Accommodation

2.3 Policy DP9 sets out that the Council will resist development that involves the net loss of student housing unless either:

k) adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or

l) the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs.

2.4 There were four rooms at lower ground floor level that were previously in use as student units. A site visit indicated these were of poor quality and due to health and safety reasons, the use ceased in 2008. Given the student accommodation has not been in use over the last eight years, the loss of the four student accommodation units is considered to be acceptable.

Community Facility

2.5 Policy CS10 sets out that the Council will '*support the retention and enhancement of existing community ... facilities*' and '*facilitate the efficient use of community facilities and the provision of multi-purpose community facilities that can provide a range of services to the community at a single, accessible location*'. The site is well connected and the applicant has stated that, in their experience, there is a pressing local need for affordable community facilities. The existing church hall is a large volume space, with the vaulted ceiling providing a 10m tall internal height. The raised ground floor congregation hall is ringed by a seating gallery which provides the Church with a total capacity for attendance by 850 people. It was evident during a site visit that the main hall with high vaulted ceiling and balcony seating dates from a period of much larger congregations

than the Church now experiences. The main hall is accessible only via a series of internal and external steps, and the basement level provides a very poor level of amenity for any active use and the layout throughout provides little opportunity for flexibility.

- 2.6 The proposals would rationalise and modernise the community spaces within the building, providing fully accessible and flexible community/church rooms. At lower ground and ground floor levels, the main church hall would be reconfigured to provide a double height community space to meet the needs of the existing congregation and level access leading down to the community use. The congregation capacity is likely to be for approximately 80 people.
- 2.7 The need for local community facilities at a reasonable rate is consistent with the experience of officers in the Regeneration and Partnerships division. The current Community Investment Programme is looking to rationalise council property so that fewer better quality community spaces will be available. This is likely to mean that there will be a greater demand for affordable space for community groups in Camden, and hence the provision of alternative facilities such as is proposed by the Methodist Church would be welcome.
- 2.8 Policy DP15 seeks to protect existing community facilities unless a replacement facility is provided or the local need for such facilities is no longer evident. The applicant has stated that a pressing local need exists and the proposals are specifically aimed at providing an improved community (Class D1) facility. The proposal would protect existing community facility and re-provide enhanced community facilities and the principle of the proposal is considered to be acceptable which could be used not only by the church congregation but also by other community groups.
- 2.9 The applicant proposes to use part of the lower ground floor as a multi-purpose room which would partly be used by the hotel and partly by the community. In order to ensure that the room is to be used by the community, a condition would be attached in the event the proposal would be considered acceptable.

Tourism and visitor accommodation

- 2.10 Policy DP14 sets out that the Council will support small scale visitor accommodation in town centres including Camden Town. The proposal site is easy to access by public transport, provides drop off and pick up points and does not harm the mix of uses in the area. As such the proposed hotel use is considered to be appropriate in this area.
- 2.11 The principle of the hotel use in this location which would support the needs of the existing Methodist Church community by improving the structure of the existing building and re-providing enhanced community use is considered to be acceptable in principle.
- 2.12 However Paragraph 129 of the NPPF states that local planning authorities (LPA) should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. LPAs should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Although the proposal is considered to be acceptable in principle, in land use terms, this does not overcome the concerns expressed in the design and conservation section below.

3.0 Design and Conservation

- 3.1 The existing church is described in the Camden Town Conservation Area Appraisal and Management Strategy (CTCAAMS) as built as the New Camden Chapel in 1889, by T & W Stone. The facades are of stock brick with stucco dressings in a debased classical style, accentuated by the

pedimented front entrance. The site sits in sub area 1 which is the commercial sub area consists of a traditional wide shopping street linking the busy junction at Mornington Crescent to the eclectic and lively town centre at the heart of Camden Town. The Conservation Area has a high proportion of 19th century buildings both listed and unlisted, which make a positive contribution to the historic character and appearance of the Conservation Area. The site is noted to make a positive contribution in the Camden Town Conservation Area.

3.2 The proposal includes the following

- The erection of a roof extension which is considered to be necessary in order to accommodate a viable scheme
- The proposal seeks to provide a new structure within the envelope of the existing building
- The reconfigurations of internal levels to accommodate the church function and the hotel use
- Associated external alterations to provide level access at street level

3.3 S.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in relation to conservation areas requires that “..Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Where harm to the character and appearance of the conservation area has been identified as a result of this development proposal the Council must give this harm considerable importance and weight in their balanced judgement of the application

3.4 Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

3.5 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets (NDHA), a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.6 Paragraph 134 of the NPPF is clear that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

3.7 Policy DP25 outlines that only permit development within conservation areas that preserves and enhances the character and appearance of the area;

3.8 Camden Planning Guidance 1 (Design) sets out that the significance of ‘Non-Designated Heritage Assets’ (NDHAs) will be taken into account in decision making

Proposed Roof Extension

3.9 The existing roof form is an original tiled pitch typical of a 19th century church. The proposal includes a new roof which is proposed to be cladded in standing seam zinc the proposed extension is 1.5 storeys which includes an additional floor and planting.

3.10 CTCAAMS states fundamental changes to rooflines and insensitive alterations can harm the historic character of the roofscape and will not be acceptable. The proposed massing is prominent in views from the surrounding Camden Town Conservation Area, particularly in views looking east. Attempts have been made in the proposed design to reference a traditional roof form; however the proposed roof form is considered to be inappropriately bulky and appears to have an incongruous relationship with the host building. The fenestration facing Plender Street within the proposed roof does not in any way relate to the host building appearing to be dominant and unsympathetic. The

proposed roof appears to be somewhat alien, unsympathetic and uncharacteristic of this part of the conservation area. It is considered that the proposed design will lead to less than substantial harm to the significance of the Camden Town Conservation Area.

3.11 Paragraph 134 of the NPPF states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

3.12 The site is currently in use by the church and the applicants have not demonstrated that it would be unfeasible for a scheme which would do less harm to the building and the conservation area whilst maintaining the church use. Therefore the proposal does not meet the test set in paragraph 134 of the NPPF above.

3.13 There is benefit to the proposed scheme which would re-provide enhanced community facility for the user group. The Council recognises that The Wesley Hotel claims to be an ethical business but there is nothing to suggest that the approach taken by the Wesley Hotel is so significantly different to other hotel operators that the benefits of their achieving a new venue in Camden outweighs the harm to this site and the conservation area. The applicant has not demonstrated that the less than substantial harm that would arise from this particular scheme is necessary to achieve the main public benefit of retaining the church use with enhanced community facilities. These are not substantial public benefits that outweigh the harm.

3.14 The existing building is noted as a positive contributor and therefore can also be considered a non-designated heritage asset. The loss of the historic roof form to be replaced with such an unsympathetic roof form would result in detrimental harm to the non-designated heritage asset. The proposal does not sustain and enhance the significance of the non-designated heritage asset (NDHA) and fails to explore viable uses that would be consistent with its conservation.

Relationship between the internal structure and external façade

3.15 Significant concerns have been raised in relation to the proposed internal structure which is to be suspended within the existing envelope of the building and its relationship to the streetscape. There is significant concern that when looking into the building from the street, an onlooker would see floor plates or structures. The proposed internal structure would sit oddly with the fenestration and therefore the relationship between the proposed internal structure and the retained external façade would be incongruous and would harm the surrounding conservation area.

External alterations

3.16 The proposal includes alterations to the front elevation which include the removal of the existing steps to create level access. This in turn results in alterations to the opening and as a result of the changes the classical proportion of the door and the columns are distorted. It is considered that the proposed alterations would harm the special character of this positive contributor.

3.17 It is considered that the proposed roof form and fenestration, the relationship between the proposed internal structure and the external fabric and the external alterations would harm the conservation area and the significance of the non-designated heritage asset. It is considered that the significant alterations being proposed at this site is to accommodate a particular business model. The proposed use is not considered to be the optimal viable use for this site and the proposal does not bode well with the long term conservation of the site. As such the proposal is considered to be unacceptable in design terms.

4.0 Amenity

Daylight and sunlight

4.1 An External Daylight and Sunlight Report has assessed the implications of sunlight and daylight on surrounding properties. The report concludes that the VSC, ADF and No-sky/daylight distribution analysis indicates that all but two windows pass at least one of the BRE studies. The neighbouring windows will automatically remain adequately lit in the majority as a result of the development proposals and will comply with the BRE criteria in the urban context.

Privacy and Outlook

4.2 The closest properties containing elements of residential are considered to be 87 – 88 Plender Street, the properties along King's Terrace and the properties along Bayham Street which back onto the rear of the site.

4.3 The scheme retains the existing window openings, adding new windows only at the mansard extension level. The existing windows do not align with the hotel bedrooms, as the scheme is based upon a concrete frame erected internally within the existing buildings. This reduces any opportunities of direct overlooking from the new hotel bedrooms into the residential units.

Hotel Management

4.4 The draft Hotel Management Plan has been prepared to accompany the planning application submission. This provides an overview of how the hotel will be managed, including details of managing visitors, staff and deliveries. It is proposed that further detail could be provided, as required, ahead of occupation. This would be secured through a Section 106 legal agreement in the absence of such an agreement the development is unacceptable.

Noise

4.5 The proposal includes plant within the mansard roof. The Noise Assessment demonstrates the proposed plant would not result in unacceptable noise levels and is therefore considered acceptable.

5.0 Transport

5.1 The site has a public transport accessibility level of 6a (highly accessible). Visitors and staff are expected to walk and cycle to the site. The proposal accords with London Plan Policy 6.1 and Camden Policies DP16 and DP17.

5.2 Should the proposal be considered acceptable a hotel management plan would require details to be submitted of pick up and drop off points which would be secured through a Section 106 legal agreement. In the absence of such an agreement the development is unacceptable.

5.3 Given the extent of the proposed works, officers consider that a highways contribution would be required should the proposal be considered acceptable. In practice this would repair any damage to the public highway as a result of the proposal. This would need to be secured by way of a s106 legal agreement. In the absence of such an agreement the development is unacceptable.

5.4 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 the proposal would be unacceptable.

6.0 Waste and Recycling

6.1 A refuse store would be located internally at lower ground level providing 2 x 1100 L Eurobins (for general waste and recycled material) and 1 x 500 L Eurobin (for food waste) this is found to be in accordance with Camden's Waste Standards set out in CPG1. One existing window on the King's Terrace elevation will be converted to a door to allow for refuse and recycling to be put out for collection and any deliveries to be brought into the building. It is proposed that any waste and recycling

will be put outside the building 30 minutes before Camden's waste collection times (06.00, 18.00 or 00.00) should a collection be required that day. This approach to waste collection is considered to be acceptable.

7.0 Energy and Sustainability

7.1 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 subcategory 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. The planning statement has considered energy and sustainability requirements set out in Policy DP22.

7.2 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

7.4 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.

7.4 The Council expects developments to achieve a reduction in CO2 emissions of 20% from on-site renewable energy generation unless it can be demonstrated such provision is not feasible (policy CS13 paragraph 13.11). It has not been demonstrated the provision is not feasible if permission were to be granted a clause would be included in the legal agreement securing an energy strategy which would include details of on-site renewable energy facilities. In the absence of such an agreement the development is considered to be unacceptable.

8.0 Public open space

8.1 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 .

8.2 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.

8.3 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.

8.4 Following the advice set out in CPG6 (paras. 11.33 – 11.41 and appendix C), this non-residential

development providing 40 double rooms would be required to contribute (per room) £593 [Capital cost], £594 [Maintenance] and £71 [Design and admin], in total a contribution of £54094 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.

9.0 Community Infrastructure Levy

9.1 The proposal would be liable to CIL as it creates more than 100 sqm of floorspace. The Mayoral CIL would be £34,800 and the Camden CIL would be £20,880.

10.0 Recommendation

10.1 The principle of the proposal to provide a hotel use so that the community use could be enhanced and re-provided is considered acceptable. However the proposed massing and the proposed internal structure and the alteration to the front elevation would result in significant harm to the conservation area. Officers therefore recommend the application to be refused.

