THE HOXTON, HOLBORN, WC1V 7BD

Proposed 50 (46 Net Gain) Bedroom Extension

Transport Statement

Prepared on behalf of The Hoxton (Holborn) Limited

JDF/HOXT/16/3197/TS01

December 2016

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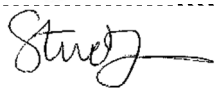
Checked by:		Date	16/12/2016
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1 INTRODUCTION

1.1.1 RGP is commissioned by The Hoxton to provide transport planning and highway advice in respect to a proposed 50 (46 net gain) bedroom extension to The Hoxton hotel at 199-206 High Holborn, within the London Borough of Camden (LBC).

1.1.2 The site currently comprises a 174 bedroom hotel with ancillary restaurant, bar and meeting room facilities. A service yard is provided to the rear of the building, accessed from Newton Street at the site's eastern frontage. The service yard affords sufficient space for delivery and servicing vehicles to turn on-site and exit in a forward gear, whilst also providing 3 disabled car parking spaces.

1.1.3 The proposals would involve construction of a first to fifth storey extension to the south of the existing building and infill of the rear yard area with undercroft retained for the service yard. A total of 220 guest bedrooms would be provided post-development. A single disabled parking bay would be retained on-site to accommodate the anticipated demand for disabled parking. A plan illustrating the proposed site layout is attached at **Appendix A**.

1.1.4 The site is located at the southern corner of the A40 High Holborn / Newton Street Junction. The site benefits from an excellent level of accessibility to the public transport network, as reflected by its PTAL rating of 6b, with Holborn Underground station and a range of frequent bus services available in the vicinity of the site.

1.1.5 As background, pre-application advice has been sought from LBC, as highway authority, and the response provided by the Council (dated November 2016 and attached at **Appendix B**) has not highlighted any significant concerns regarding transportation and highways related matters. However, LBC has outlined concern regarding the loss of two disabled parking bays on-site, which this report seeks to address.

1.1.6 RGP has a good knowledge of the site, having previously prepared a Transport Assessment in support of the hotel's initial planning consent in August 2013 (planning reference: 2013/2899/P).

1.1.7 A Travel Plan and Delivery and Servicing Management Plan were prepared by RGP for the site's previous consent and these documents have been updated accordingly to reflect the current development proposals. The Delivery and Servicing Management Plan (reference: JDF/HOXT/16/3197/TN01) and Travel Plan (reference: JDF/HOXT/16/3197/TP01) form separate documents and should be considered in conjunction with this Transport Statement.

1.2 Report Structure

1.2.1 The principal focus of this report is to consider the operation of the hotel post-extension, principally in regard to the anticipated trip generation and the operation of the site in terms of servicing and deliveries, accessibility by public transport and disabled access. The remainder of this Transport Assessment comprises the following sections:

(i) **Section 2**: Transport Policy Review;

(ii) **Section 3**: Baseline Conditions;

(iii) **Section 4**: Trip Generation;

(iv) **Section 5**: Car Parking;

(v) **Section 6**: Servicing Arrangements;

(vi) **Section 7**: Summary and Conclusions.

2 TRANSPORT POLICY REVIEW

2.1.1 This section summarises the key national, regional and local transport policies pertaining to the proposed development. These policies are assessed in relation to the scale and type of development, as well as the site's location.

2.1.2 The site is located within Central London, characterised by a wide range of land uses locally, including business / commercial, leisure and retail uses, as well as some tourist attractions and residential properties. The site is located 100m to the west of Holborn station, providing access to the London Underground Network, and within a short walk of Charing Cross station which provides access to a range of National Rail services to destinations in London and further afield to the southeast of England.

2.1.3 The site has an 'excellent' level of accessibility to public transport infrastructure as defined by its PTAL rating (PTAL 6b) and it is therefore anticipated that the majority of staff and visitors would travel to the site via public transport modes.

2.1.4 It is therefore considered that the relevant national, regional and local transport policies should be considered in the context of the site's Central London location, the excellent standard of public transport provision available locally, and the wide range of local amenities.

2.2 The National Planning Policy Framework (March 2012)

2.2.1 The National Planning Policy Framework (NPPF) came into effect in March 2012 and replaces all previous Government Planning Policy Guidance. The NPPF broadly covers all aspects of planning policy and the extracts below detail those relevant to this site and transport.

2.2.2 Paragraph 32 outlines the basic transport requirements for developments to provide, and states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.

(i) "Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure";

(ii) "safe and suitable access to the site can be achieved for all people"; and

(iii) "Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds **where the residual cumulative impacts of development are severe**".

2.2.3 The development complies with the above in that a Transport Statement has been provided which fully assesses the impact of the proposed development.

2.2.4 Furthermore the NPPF recommends that planning policies aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

2.2.5 The development site is situated within a vibrant area, close to many attractions and transport hubs enabling guests to reach their ultimate destination by way of walking, cycling or public transport, as well as enabling staff to conveniently travel to and from the site as part of their daily commute.

2.3 National Planning Practice Guidance (March 2014)

2.3.1 The National Planning Practice Guidance (NPPG) provides additional information to support the NPPF. In relation to Travel Plans, Transport Assessments and Transport Statements it notes that "*they support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*."

2.3.2 The development therefore represents a sustainable development proposal, being located in a highly accessible location, and hence meets the key aspirations of the NPPF and supporting NPPG.

2.4 The London Plan (2015)

2.4.1 **Policy 6.1** of The London Plan states that the Mayor will encourage patterns and forms of development that reduce the need to travel, especially by car. **Policy 2.15** relates to town centres and details that town centre developments should enhance the vitality and viability of the centre, promote access by public transport, walking and cycling; and reduce delivery, servicing and road user conflict.

2.4.2 The site is conveniently located in terms of access by National Rail, London Underground and local bus services. Additionally, there is high quality pedestrian and cycle infrastructure provided throughout the local area, thus satisfying the aims of the above policy with the infrastructure capable of supporting a significant level of further development.

2.4.3 **Policy 6.13C** 'Parking' of the London Plan states that maximum parking standards should be applied to planning applications. This goes on to state that no maximum standards are set for hotels, although for applications referred to the Mayor, in locations with a PTAL of 4-6, on-site provision should be limited to "*operational needs, parking for disabled people and that required for taxis, coaches and deliveries / servicing*".

2.4.4 It should also be noted that minimum standards for disabled parking in relation to hotel developments are not specified within the London Plan. In terms of disabled parking generally for new developments, paragraph 6.44 of the London Plan states that parking provision should always be provided. This paragraph also highlights that "*Boroughs should take into account local issues and estimates of local demand in setting appropriate standards and should develop monitoring and enforcement strategies to prevent misuse of spaces. Applicants for planning permission should use their transport assessments and access statements to demonstrate how the needs of disabled people have been addressed*".

2.4.5 This report therefore seeks to address the likely demand associated with disabled parking at the hotel and to establish a suitable provision to accommodate such demand.

2.4.6 The London Plan also states that the Mayor will, and boroughs and relevant stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision, seeking to achieve 40,000 net additional hotel bedrooms by 2031.

2.4.7 The proposed hotel meets the aims of the London Plan, being within a highly sustainable location, ideally located with excellent accessibility to the public transport network. As such, no dedicated parking for the development is provided, with the exception of disabled parking provision.

2.4.8 Cycle parking standards contained within 'Chapter Six: London's Transport' (March 2016), suggest the following guidance towards cycle parking provision with regards to hotels (**Figure 2.1**).

Land Use Class	Long Stay	Short Stay
C1	1 space per 20 bedrooms	1 space per 50 bedrooms

Figure 2.1. The London Plan Cycle Parking Guidance (2016)

2.4.9 It is also worthy of note that the site is located on the boundaries of both the Holborn Intensification Area and the Tottenham Court Road Opportunity Area as defined within the London Plan. As part of the Holborn Intensification Area, the site's locality is encouraged to provide a higher density of mixed use development and will benefit from improved public transport as a result of the London Plan's policies regarding these areas.

2.5 LBC Planning Policies

2.5.1 The Camden Core Strategy 2010-2025 seeks to actively promote a concentration of growth within Holborn, including a mix of land uses, as stated within **Policy CS1** and **Policy CS2**.

2.5.2 Camden's Development Policies set out detailed planning criteria that are used to determine applications for planning permission in the borough. Development **Policy DP16** considers the transport implications of development, including highway links, transport capacity and the provision of pick-up / drop off and waiting facilities. Paragraph 16.5 of this, to which particular consideration is given within this Transport Statement, states that:

'Developments should link in well with their surrounding by allowing for movement to and through development sites, in order to contribute to improved accessibility across the borough. Some developments may need to be designed to accommodate public routes across the site, for example because they straddle an existing footpath. Designs for sites should be permeable so that linkages and public through routes are created and the development is integrated with the wider street pattern.'

2.5.3 The existing site is well connected to with the local network of pedestrian infrastructure. High Holborn provides high quality pedestrian footways and crossings and the current hotel entrance onto High Holborn would be retained post-development.

2.5.4 As outlined in Section 1, a separate Travel Plan document was prepared by RGP in support of the site's 2013 planning consent and this has been updated to demonstrate the opportunities for sustainable travel and details measures that will act to encourage the use of these travel modes for both guests and staff of the development.

2.5.5 Development **Policy DP17** considers the walking, cycling and public transport provision of development and states that:

'The Council will resist development that would be dependent on travel by private motor vehicles.'

2.5.6 In this instance, owing to the site's central London location and PTAL rating of 6b, as detailed within Section 3 of this report, a multitude of alternative transport modes would be available to end users of the site and hence the proposals are considered to conform to this policy.

2.5.7 Development **Policy DP18** and **DP19** relate to car parking provision and managing the impact of parking. DP18 states that:

'The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.'

2.5.8 LBC's car parking guidance for hotel developments is set out within Appendix 2 of their Development Policies document (adopted 2010).

2.5.9 In terms of staff / operational car parking, LBC's standards are for a maximum of 1 space per 1,500sqm in 'low parking provision areas' and for a maximum of 1 space per 1,000sqm in the rest of the borough.

2.5.10 In terms of disabled car parking, a minimum provision of 1 space per employee is required from a threshold of 2,500sqm, with 1 space per 20,000sqm or part thereof (whichever is greater). For guests, from a threshold of 2,500sqm, one space should be provided per 1,250sqm or part thereof.

2.5.11 Coach parking provision should be considered within the Transport Statement, taking into account the need for space for coaches to pick-up / set-down and wait. Consideration is given to the likelihood of coach arrivals, and suitable locations for guest set-down are identified, in the event that coach parties were to arrive at the hotel. Taxi activity would not significantly change post-development and the proposed arrangements are detailed within Section 6 of this report.

2.5.12 Further cycle parking guidance is set out by LBC in addition to the overarching policies within the London Plan. This policy suggests that Staff parking, from a threshold of 500sqm should be provided at a minimum rate of 1 space per 500sqm or part thereof. Guest cycle parking should be provided at the same rate, in addition to the staff provision. Full consideration is given to appropriate cycle parking within this report.

2.5.13 Development **Policy DP20** relates to the movement of goods and materials. This can be done by '*minimising the movement of goods and materials by road*' and '*minimising the impact of the movement of goods and materials by road*'. In terms of minimising the impact of deliveries by road, this states that:

'The Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to be located close to the TfL Road Network or other Major Roads; avoid any additional need for movement of vehicles over 7.5 tonnes in predominantly residential areas; accommodate goods vehicles on site; and seek opportunities to minimise disruption for local communities through effective management, including through the optimisation of collection and delivery timings and the use of low emission vehicles for deliveries.'

2.5.14 The site will provide a dedicated on-site delivery and servicing area to accommodate all needs associated with the hotel. A separate Delivery and Servicing Management Plan (DSMP) has also been prepared tailored to the specific needs of the development, detailing measures which will control and manage the site's servicing arrangements.

3 BASELINE CONDITIONS

3.1 Site Location and Highway Network

3.1.1 The site is located within the district of Holborn which forms part of the wider London Borough of Camden. The Hoxton hotel is bounded by the A40 High Holborn to the north, Newton Street to the east, a beauty parlour and restaurant to the west and an apartment block to the south.

3.1.2 There is an extensive range of land uses located in the vicinity of the site, including financial services, office uses, restaurants and bars. Additionally, the New London Theatre and Oasis Sports Centre are located approximately 200m to the south and west respectively.

3.1.3 Vehicular access to the site's delivery yard and disabled parking bays is provided from Newton Street to the east. There is a good level of visibility afforded from the site's access onto Newton Street in both directions and the existing access would be retained post-development.

3.1.4 Newton Street facilitates one-way traffic in a northbound direction and serves primarily as an access road, accessible from Parker Street and Great Queen Street to the south. There are double yellow line markings along both sides of Newton Street with the exception of two resident parking bays on-street immediately to the south of the site's service access, one of which is marked as a disabled parking bay.

3.1.5 The A40 High Holborn which forms a route along the northern site boundary affords access to the A4200 Kingsway, approximately 100m to the east of the site. Kingsway in turn provides a route south towards the A4 Strand and A301 Waterloo Bridge, as well as continuing to the north of the site towards Camden High Street, via the A501 Euston Road.

3.1.6 The A40 provides a route to the west of the site via the Tottenham Court Road and Oxford Street retail areas, prior to its junction with the A5 at Marble Arch. The A40 is marked by double yellow lines at the site's frontage with kerbside markings to stipulate no loading at specified times.

3.1.7 The site is conveniently located in terms of access from the wider highway network and **Plan 01**, attached, illustrates the site's location in context of the local road network, public transport infrastructure and visitor attractions.

3.2 Accessibility Credentials

3.2.1 In order to establish the current potential for guests and staff to travel to the site by sustainable travel modes, in accordance with relevant national (The National Planning Policy Framework), regional (The London Plan) and local (LBC Development Policies) transport planning policy objectives, a review of the existing transport infrastructure and services within the vicinity of the site is provided within this section of the report.

3.2.2 Considering the site's Central London location, it is likely that public transport and 'active' modes of travel such as walking and cycling would be the primary choice by staff and guests to reach the site and to complete local trips during the day. In order to gain an understanding of how journeys would be made to and from the proposed development by sustainable means of travel, a review of the existing provision of transport infrastructure and services has been undertaken.

3.2.3 The need for guests and staff to travel greater distances from the site during the day is also reduced by the proximity of local retail, leisure and business uses throughout the local area.

3.3 Walking and Cycling

3.3.1 There is an excellent standard of pedestrian infrastructure provided throughout the local area. Wide, well-lit pedestrian footways continue from the hotel entrance along the A40 Holborn Road in both directions and also form a route along the site's eastern boundary at Newton Street.

3.3.2 There are signalised pedestrian crossings with dropped kerbs and tactile paving provided within the immediate vicinity of the site across both Newton Street and High Holborn. There is also a crossing point with dropped kerbs provided across the site's vehicular access at Newton Street.

3.3.3 The network of high quality footways continues throughout the local area, providing safe and convenient routes for staff commuting to the site, as well as guests accessing local amenities in Holborn. There are also signalised crossings provided at regular intervals along the A40 High Holborn.

3.3.4 The local area is well suited to cycling with a number of dedicated cycle routes located in close proximity to the site. There are sections of both on-street and off-street cycle lanes provided along the A40 in the vicinity of the site and a marked cycle lane is provided along the entirety of Newton Street to the east. There are advanced stop lines provided for cyclists at several nearby road junctions.

3.3.5 The A4200 Kingsway to the east is considered to be a 'cycle friendly' route and there are cycle parking facilities provided within sections of the road's central reservation. There are also secure cycle parking stands provided at High Holborn, approximately 50m to the west of the hotel entrance.

3.3.6 Cycle parking facilities are provided on-site for the use of guests and staff. Further detail regarding these facilities is provided within Section 6 of this report. Furthermore, Santander cycle hire offers short-term bicycle rental throughout Central London, with approximately 10,000 bicycles at more than 700 conveniently located docking stations. These facilities are particularly popular with commuters and those visiting from outside London and hence would likely be utilised by some staff travelling to the site.

3.3.7 A number of Santander cycle hire stations are situated in close proximity, the closest of which are located approximately 80m to the northwest and east at Bury Place and Southampton Place respectively. **Plan 01**, attached hereto, illustrates the locations of the closest cycle hire facilities to the site as well as the local cycle routes. Additionally, the below extract from TfL provides an illustration of the local cycle hire docking stations in relation to the site.

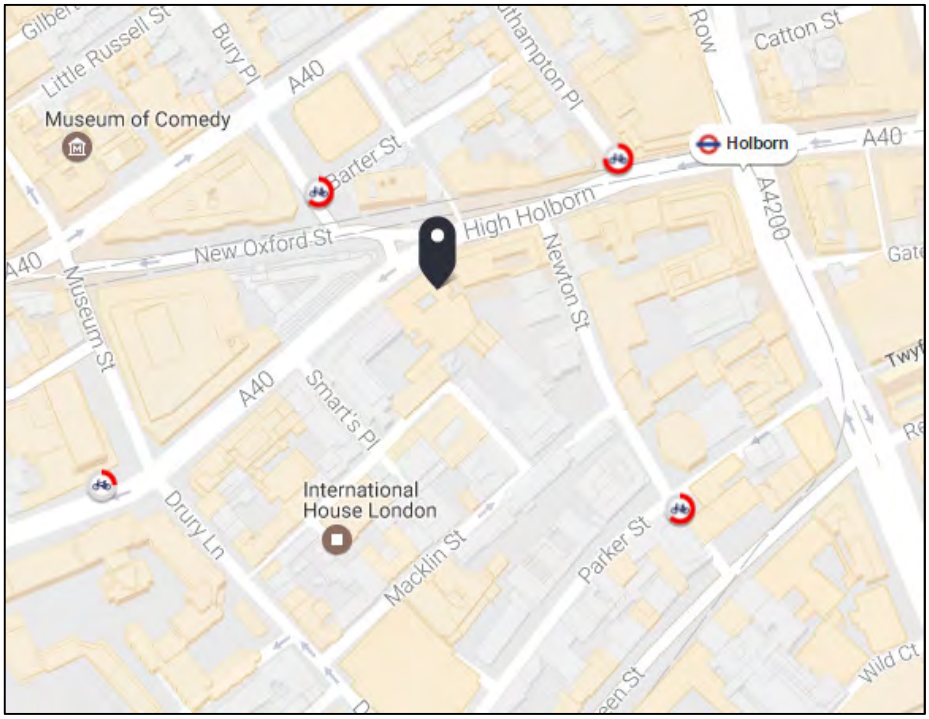


Figure 3.1. Local Santander Cycle Hire Docking Stations

3.4 Bus Services

3.4.1 There are several bus stops located within 250m (a 3 minute walk) from the site, providing services to a range of destinations. Bus stops at High Holborn, Bloomsbury Avenue, New Oxford Street and Kingsway afford a high frequency of services providing routes throughout London, including connections to major public transport interchanges such as London Bridge, Kings Cross, Euston, Waterloo and Oxford Circus.

3.4.2 These bus stops provide a shelter, seating and full timetable information as well as route maps. A summary of the available bus services locally is illustrated within **Figure 3.2**. The locations of nearby bus stops are displayed on **Plan 01**, attached.

BUS SUMMARY				
Service	Stops	Typical Frequency		Route
		Weekdays	Weekends	
1	M/P/S	6-10 mins	8-13 mins	Towards Canada Water
7	W	8-10 mins	8-12 mins	Towards East Acton
8	H/K/R	4-8 mins	6-12 mins	Towards Oxford Circus
19	B/F	7-10 mins	7-11 mins	Towards Battersea Bridge, South Side
25	H/K/R	4-8 mins	4-9 mins	Towards Oxford Circus
38	B/F	2-6 mins	3-8 mins	Towards Victoria
55	B/F	5-9 mins	7-13 mins	Towards Oxford Circus
59	M/N	5-9 mins	7-13 mins	Towards King's Cross
68	M/N	6-10 mins	6-13 mins	Towards Euston
91	M/N	6-10 mins	7-11 mins	Towards Crouch End
98	F/J/R	6-9 mins	6-12 mins	Towards Holborn
168	M/N	5-8 mins	6-12 mins	Towards Hampstead Heath
171	M/P	7-10 mins	7-12 mins	Towards Catford
188	M/N	7-10 mins	7-12 mins	Towards North Greenwich
242	H/K/Q/S	6-9 mins	5-14 mins	Towards Tottenham Court Road
243	M/P	5-8 mins	7-12 mins	Towards Waterloo
521	H/K/M	2-5 mins	No Service	Towards London Bridge
N1	M/P/S	30 mins	20 mins	Towards Thamesmead
N7	W	30 mins	30 mins	Towards Northolt
N8	H/K/R	20 mins	7-8 mins	Towards Oxford Circus
N19	B/F	30 mins	20 mins	Towards Clapham Junction
N35	B/F	30 mins	11 mins	Towards Tottenham Court Road
N38	B/F	10-12 mins	4-6 mins	Towards Victoria
N41	B/F	30 mins	20 mins	Towards Trafalgar Square
N55	B/F	30 mins	15 mins	Towards Oxford Circus
N68	M/P/S	30 mins	30 mins	Towards Old Coulsdon
N91	M/N	30 mins	15 mins	Towards Cockfosters
N98	F/J/R	15 mins	10 mins	Towards Holborn
N171	M/P	30 mins	30 mins	Towards Hither Green
N207	F/R	15 mins	7-8 mins	Towards Uxbridge
X68	M/N	15-20 mins	No Service	Towards Russell Square

Figure 3.2. Summary of Local Bus Services

3.4.3 As demonstrated above, there is a vast range of available services which would provide guests with onward travel to London-wide attractions or to major rail stations and would provide convenient travel for staff commuting to the site, for example.

3.5 London Underground Services

3.5.1 The site is located approximately 130m (a 2 minute walk) to the west of Holborn station which affords access to the Central and Piccadilly London Underground Lines. Alternatively, Tottenham Court Road station is located 550m (a 7 minute walk) to the west of the site and is accessed via the A40 High Holborn, providing Northern Line services.

3.5.2 Services from these stations offer direct links to numerous major transport interchanges including King's Cross St. Pancras, Liverpool Street, Euston and Waterloo, as well as convenient access to an extensive range of central London locations which would likely form the ultimate destinations for guests staying at the hotel.

3.6 National Rail Services

3.6.1 The nearest National Rail station is Charing Cross, located approximately 1.25km (a 15 minute walk) to the south of the site. This station provides a range of services towards destinations in the southeast of England such as Hastings, Ramsgate, Dartford and Tunbridge Wells. As detailed above, the local bus and London Underground services would provide connections to other major National Rail stations.

3.7 PTAL Assessment

3.7.1 To assess the current Public Transport Accessibility Level (PTAL) for the site, RGP has carried out a site specific PTAL assessment using the TfL Transport Planning Information Database Tool. This assessment takes account of the distance of public transport facilities from the site and the relative frequencies of these services.

3.7.2 The PTAL assessment demonstrates that the site currently has a PTAI (Public Transport Accessibility Index) of 75.72, which corresponds to a PTAL rating of 6b, representing the highest PTAL score available and level of accessibility to the public transport network. A summary of the PTAL assessment is attached hereto at **Appendix C**.

3.8 Summary

3.8.1 In summary, RGP consider that the accessibility credentials of the proposed development are particularly good, as highlighted by the site's 'excellent' PTAL score, providing guests and staff with numerous opportunities to travel by sustainable modes. It is anticipated that the extensive range of public transport services will act as the primary mode of transport for travel to/from the site. The Travel Plan prepared by RGP details further measures to encourage greater uptake of sustainable travel modes.

4 TRIP GENERATION

4.1 Overview

4.1.1 An important aspect of the development proposals is the consideration of the potential trips to be generated by the additional guest bedrooms in comparison to the site's existing operation. This section considers the existing and proposed uses of the site in terms of multi-modal trip generation, with a view to establishing the change in trip generation as a result of the 46 bedroom extension.

4.1.2 As part of the previous planning application at the site RGP prepared a Transport Assessment which included a trip generation assessment based on survey data from the TRAVL database. The TRAVL database no longer exists and the data previously referred to is now considered to be outdated. As a result, up-to-date survey data is presented and considered as part of the following trip generation assessment.

4.1.3 Although the TRICS database is the industry standard tool for deriving trip generation for a variety of land uses across the UK, including London, in RGP's experience this data is often not truly comparable for hotel developments. Many hotels within TRICS are not comparable type hotels and hence may contain conference and leisure uses on-site, for example, which makes the data unrepresentative. Furthermore, very few sites within the TRICS database are comparably located and do not reflect the proposed operator as a boutique hotel.

4.2 Existing Operation

4.2.1 In order to understand the likely impact of the proposals from a trip generation perspective, consideration has been given to operator-specific survey data from the comparably located Shoreditch Hoxton hotel at 81 Great Eastern Street, within the London Borough of Hackney. This survey was undertaken in September 2014, comprising observations of all arrivals and departures categorised by pedestrian movements, vehicle movements and delivery activity.

4.2.2 **Figure 4.1**, below, provides a summary of the key characteristics of the surveyed hotel at Great Eastern Street and the application site at High Holborn.

Hotel	PTAL Rating	Hotel Type	Bedrooms	Ancillary Facilities	On-site Parking
Application Site (High Holborn)	6b	Boutique	174 (220 proposed)	Restaurant, bar and meeting room facilities	3 disabled bays
Survey Site (Great Eastern Street)	6b	Boutique	205	Restaurant, bar and meeting room facilities	None

Figure 4.1. Site Characteristics

4.2.3 As summarised above, the survey site is particularly comparable to the application site given that they both have the same operator and as such this data is considered to be representative. **Figure 4.2**, below, provides a summary of the survey results from The Hoxton, Great Eastern Street, as observed.

	Surveyed Trip Generation - Thursday 11th September 2014								
	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00			Total Daily (07:00-19:00)		
	Arr	Dep	Two-way	Arr	Dep	Two-way	Arr	Dep	Two-way
Walk / Public Transport	81	78	159	157	120	277	1,599	1,754	3,353
Taxi	12	12	24	3	3	6	129	129	258
LGV	7	5	12	2	2	4	23	23	46
Refuse vehicle	0	0	0	0	0	0	3	3	6
Total Movements	**100**	**95**	**195**	**162**	**125**	**287**	**1,751**	**1,906**	**3,657**

Figure 4.2. Trip Generation – The Hoxton, Great Eastern Street

4.2.4 The above chart gives an indication of the likely trip generation associated with the existing site at 199-206 High Holborn. Over the course of a typical weekday it is likely that the site would generate in the region of 3,657 two-way movements by all modes when considering all on-site uses (i.e. inclusive of the hotel, restaurant, bar and meeting facilities).

4.3 Proposed Operation

4.3.1 It is important to note that the survey data does not distinguish between the purpose of each visit (i.e. whether trips are associated with the hotel or various ancillary facilities). As such, when establishing the likely increase in trips associated with the extension, it is not appropriate to factor the survey results by the number of bedrooms proposed. Since this would also factor up the restaurant / café / working space trips, which would not be representative. Therefore, in order to establish the likely trip generation associated with 46 bedrooms in isolation, and hence the likely increase, survey data from comparably located central London Premier Inn hotel close to Euston station, also within the London Borough of Camden, is referred to in order to understand the likely increase in trips based on the additional bedrooms only.

4.3.2 The Premier Inn hotel surveyed is in close proximity to the Hoxton hotel and benefits from a PTAL rating of 6b (PTAI score of 88.73), representing an 'excellent' level of accessibility by public transport.

4.3.3 The Premier Inn comprises 266 guest bedrooms and contains a restaurant / bar but no further ancillary facilities which would impact on its trip generation characteristics. The trip generation recorded at this site therefore relates purely to hotel bedrooms and is not influenced by other land uses. **Figure 4.3**, below, provides a summary of the anticipated trip rates associated with the hotel.

	Surveyed Trip Rate – Thursday 16th June 2011								
	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00			Total Daily (07:00-23:00)		
	Arr	Dep	Two-way	Arr	Dep	Two-way	Arr	Dep	Two-way
Walk / Public Transport	0.02	0.23	0.26	0.14	0.02	0.16	1.10	1.19	2.29
Car / Taxi	0.00	0.02	0.03	0.01	0.00	0.02	0.08	0.08	0.16
Total Movements	**0.03**	**0.25**	**0.28**	**0.15**	**0.03**	**0.18**	**1.23**	**1.33**	**2.56**

Figure 4.3. Proposed Trip Rates (per hotel bedroom)

4.3.4 **Figure 4.4**, below, provides a summary of the resultant trip generation impact of the proposed extension, factored to 46 bedrooms.

	Proposed Trip Generation								
	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00			Total Daily (07:00-23:00)		
	Arr	Dep	Two-way	Arr	Dep	Two-way	Arr	Dep	Two-way
Walk / Public Transport	1	11	12	6	1	7	51	55	105
Car / Taxi	0	1	1	0	0	1	4	4	7
Total Movements	**1**	**12**	**13**	**7**	**1**	**8**	**57**	**61**	**118**

Figure 4.4. Proposed Trip Generation (46 bedrooms)

4.3.5 As summarised above, the proposed 46 bedroom extension would generate approximately 118 additional two-way movements (by all modes) over the course of a typical weekday. These would largely comprise journeys on foot and by public transport.

4.3.6 Approximately 7 additional two-way vehicle movements would be anticipated over the course of a typical weekday. Since the site would have no on-site car parking it is likely that this would comprise taxi pick-up / drop off activity. This is not considered to represent a significant increase during the course of the day with a maximum of 1 additional two-way vehicle movement generated during each peak hour. The proposed site operation would therefore continue largely as existing in terms of vehicular traffic to the site and further details regarding taxi drop-off / pick-up arrangements are provided later in this report.

5 DELIVERY AND SERVICING IMPACT

5.1.1 The proposed extension would be constructed over the existing access route to the rear service yard. Delivery vehicle access would be retained at ground floor level below this extension and supporting columns would be suitably positioned allowing continued access by all delivery and servicing vehicles and sufficient space to manoeuvre such that these would depart the site in a forward gear.

5.1.2 RGP has undertaken a swept path assessment to demonstrate the required manoeuvre for delivery vehicles to access and egress the on-site service yard. **Drawing 16/3197/001**, attached illustrates that a 10m rigid delivery vehicle (the largest anticipated on-site) could access the service yard and a sufficient turning space is retained between the cycle racks and disabled bay to enable the vehicle to egress the site safely in a forward gear.

5.1.3 The proposed size and frequency of delivery vehicles to the site would remain unchanged post-development and a 10m rigid delivery vehicle would continue to be utilised in accordance with the extant planning consent.

5.1.4 The delivery schedule illustrated in **Figure 5.1** provides a summary of existing deliveries to the hotel over the course of a typical week. The hotel would continue to operate in accordance with the previously approved Delivery and Servicing Management Plan, which has been updated by RGP to reflect the proposed site details.

Large Scale Delivery Schedual for The Hoxton, Holborn

		Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Bev	08.30 - 15.00		6	5	5	6	1	
Food	05.00 - 15.00	6	3	4	5	7	2	
Linen	9am - 11am	1	1	1	1	1	1	1
Bins	10am - 12 noon	1	2	1	2	1	2	

Figure 5.1. Delivery Schedule for the Hoxton Hotel, Holborn

5.1.5 As outlined in the above figure, a maximum of up to 15 deliveries take place during the course of a typical weekday, with an average of 11-12 daily vehicle movements anticipated between Monday and Friday, and a minimal number of deliveries occur over the course of the weekend. These deliveries provide for all uses on-site and further details of these arrangements are provided within the Delivery and Servicing Management Plan prepared in support of the proposed extension.

6 PARKING ARRANGEMENTS

6.1 Overview

6.1.1 The existing site provides 3 disabled bays to the rear of the hotel adjacent to the service yard and accessible from Newton Street. Under the development proposals, the level of disabled parking would be reduced to a single bay adjacent to the service yard.

6.1.2 As outlined in Section 1 of this report, the proposed parking arrangements have been highlighted as a potential concern by LBC within the pre-application advice provided and it is necessary that a robust assessment of the demand for these spaces is provided in order to justify the reduced provision.

6.2 Parking Standards

6.2.1 In regard to local policy, **Figure 6.1**, below, provides an extract of Camden's parking standards in relation to hotel (C1) land uses as contained within the Development Policies document.

C1 – Hotels	
Cycles	Staff – from threshold of 500 sq m, 1 space per 500 sq m or part thereof. Customer – from threshold of 500 sq m, 1 space per 500 sq m or part thereof.
People with disabilities	Staff/ operational – 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof – whichever is the greater. Customer – from threshold of 2,500 sq m, 1 space per 1,250 sq m or part thereof.
Service vehicles	Required above 2,500 sq m - one 3.5m x 8.5m bay.
Coaches	Above 2,500 sq m – the Transport Assessment required under policy T1B / Appendix 2 will be required to consider the need for space for coaches to pick-up/ set-down and wait.
Taxis	Pick-up/set-down bay adequate for 2 required above 2,500 sq m, with any departure justified by a Transport Assessment.
Other staff/ operational parking	Low parking provision areas: maximum of 1 space per 1,500 sq m Rest of borough: maximum of 1 space per 1,000 sq m
Other resident parking	Only considered if supported by a Transport Assessment (or supporting information as appropriate for smaller schemes) showing that existing spaces, public transport and coaches/ taxis cannot cater for the expected travel demand, and a Travel Plan can be secured.

Figure 6.1. LBC Parking Standards

6.2.2 Based on the above standards, the site should provide a minimum of 3 disabled bays post-development. It is worth noting however that LBC are currently in the process of examining the Draft Local Plan, prepared in 2016, which will replace both the Core Strategy and Camden Development Policies documents. **Policy T2** of the emerging Local Plan states the Council's intentions to limit on-street parking permits with the exception of disabled drivers. Supporting text to this policy also states that "*People with disabilities who are Blue Badge holders may park in onstreet spaces without a parking permit*".

6.2.3 As background there is an on-street disabled bay located immediately to the south of the site's vehicular access on Newton Street. Under the emerging Local Plan, it is apparent that this disabled bay would be retained and available for use of hotel guests. Further to this, the current adopted policy is out-dated by the London Plan standards.

6.2.4 Although there are no maximum standards outlined within the London Plan specifically relating to hotel developments, it is advised that on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing in location represented by a PTAL rating of 4-6. It is also worth noting that the London Plan standards refer to a provision of 1 disabled space per employee who is a disabled motorist, plus 6% of the total car park capacity for leisure facilities. This provides an indication to the expected required level for hotels.

6.2.5 Additionally, as detailed in Section 2 of this report, paragraph 6.44 of the London Plan states that parking provision should always be provided. This paragraph also highlights that "*Boroughs should take into account local issues and estimates of local demand in setting appropriate standards and should develop monitoring and enforcement strategies to prevent misuse of spaces. Applicants for planning permission should use their transport assessments and access statements to demonstrate how the needs of disabled people have been addressed*".

6.2.6 The following assessment therefore examines the likely demand generated for disabled parking at the proposed site using data obtained from the hotel operator. The anticipated demand established seeks to justify the proposed parking provision on-site to accommodate the demand for disabled bays.

6.3 Anticipated Demand

6.3.1 Information obtained from the general manager of the hotel provides a record of reservations made for a disabled parking bays through the hotel's booking system. Within the past 18 months of operation at the hotel, there has been no reservation made for the disabled parking bays and only on rare occasions have they been utilised prior to this time period.

6.3.2 Owing to the complimentary nature of the restaurant and conference facilities operating as an ancillary use to the restaurant, the disabled parking bay would not generate any additional external trade and would be used exclusively by hotel guests.

6.3.3 It is therefore evident that there is an exceptionally low level of demand generated for the on-site parking bays under the existing site operation, with no reservations for the spaces made within the most recent 18 month period.

6.3.4 The use of the on-site disabled bay would continue to be monitored and reservations for the use of this bay would be required as part of the hotel booking process. Guests would be asked by reception staff as to whether this bay is required for the duration of their stay when booking a room and as a result, the hotel will be able to communicate the availability of this bay with other guests prior to booking.

6.3.5 In accordance with the guidance provided in paragraph 6.44 in support of Policy 6.13 of the London Plan, the needs of disabled guests has been addressed under the proposals. In the unlikely event that the space is occupied, the hotel will valet park the customer's car in a suitable location.

6.4 Cycle Parking

6.4.1 The site currently provides secure cycle parking to the rear of the hotel adjacent to the service yard with capacity for 20 bicycles which would be retained. This level exceeds the required minimum outlined within the London Plan, inclusive of the additional guest bedrooms which would result in a total requirement for 15 spaces.

6.4.2 There is also a wealth of on-street cycle parking available in the form of 'Sheffield style' stands in close proximity to the site which would cater for additional demand in the unlikely event that it exceeds the proposed level on-site.

6.5 Taxi and Coach Activity

6.5.1 Taxi pick-up and drop-off activity currently takes place on-street either from High Holborn at the site's northern frontage adjacent to the hotel entrance, or from Newton Street at the site's eastern boundary. As demonstrated within the trip generation assessment, it is anticipated that an increase of 7 two-way taxi movements would occur throughout the course of the day following the extension proposals. This represents a negligible increase and as such, the existing taxi drop-off / pick-up arrangements would not be subject to alteration.

6.5.2 The Hoxton hotel rarely receives coach party bookings, however, should large group bookings be accepted, there are coach bays located nearby which would accommodate set-down / pick-up activity. There are two located on the A40 High Holborn, approximately 250m and 125m to the east and west of the hotel respectively. The extract at **Figure 6.2** from TfL's website illustrates the location of these bays, as well as nearby metered coach parking spaces.

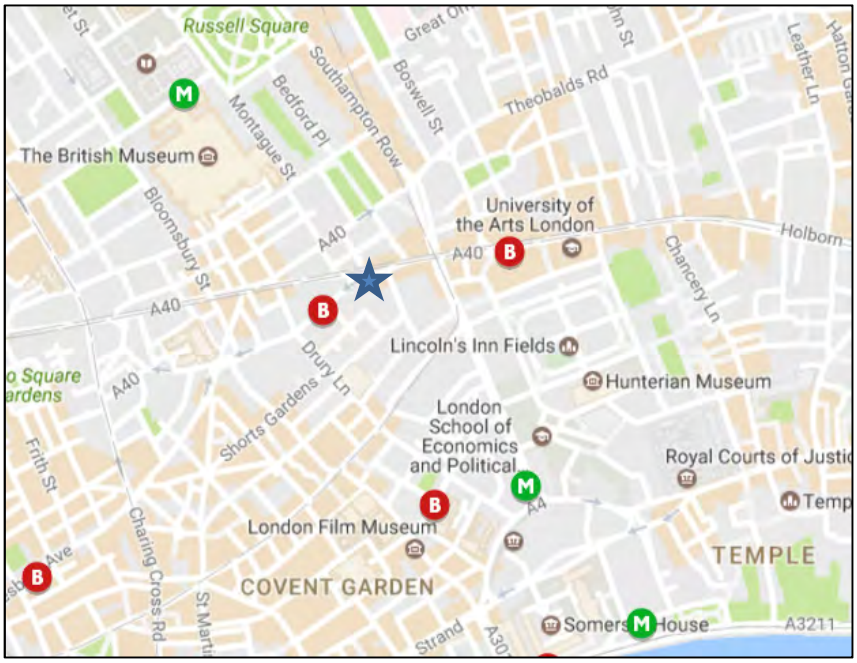


Figure 6.2. Local Coach Drop-Off / Parking Facilities

7 SUMMARY AND CONCLUSIONS

7.1.1 This Transport Statement has considered the transport planning implications associated with the proposed 50 (46 net gain) bedroom extension to The Hoxton, Holborn hotel.

7.1.2 RGP make the following conclusions of this Transport Statement:

(i) The proposals would accord with national, regional and local transport policy;

(ii) The site is well located to benefit from a high standard of pedestrian, cycle and public transport infrastructure, as is demonstrated by its PTAL score of 6b, representing the highest level of accessibility;

(iii) The proposals would result in a minimal increase in total two-way vehicle movements at the site (an additional 7 two-way movements daily), which would likely comprise taxi pick-up / drop-off activity;

(iv) The proposals would not provide any on-site car parking facilities with the exception of 1 disabled car parking space to be retained on-site in line with London Plan policy, which has been demonstrated by operator-specific data to accommodate the anticipated level of demand generated for disabled parking;

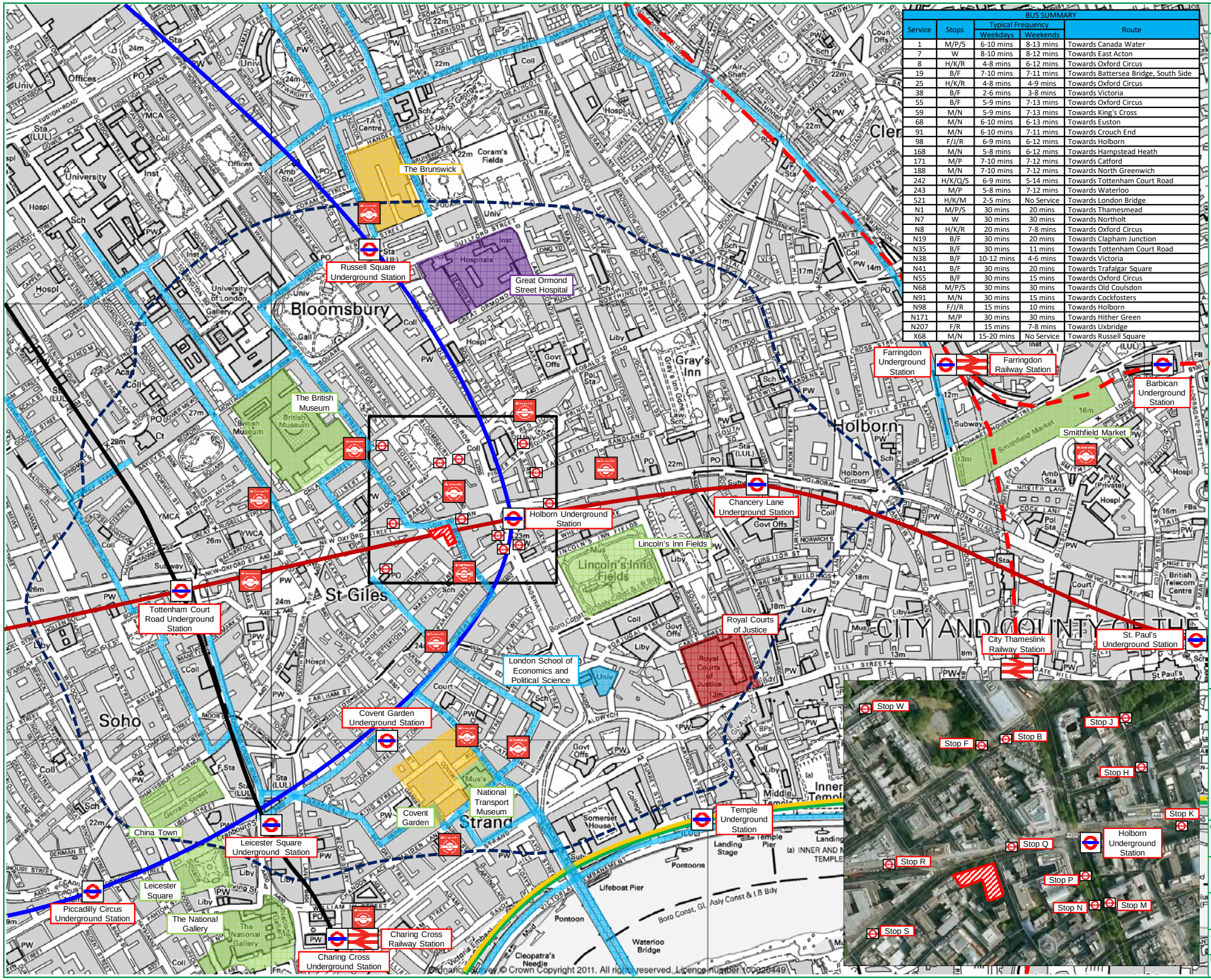
(v) Secure cycle parking would continue to be provided on-site in accordance with the minimum standards contained in local policy;

(vi) Servicing would take place on-site in the dedicated service yard, whilst the size and frequency of delivery vehicles would remain unchanged. Servicing would not impact on the free-flow of traffic or pedestrian activity.

7.1.3 Overall, this report demonstrates that the proposed development would not have a demonstrable impact on the local highway network and so there are no impediments on transport and highway grounds that should prevent the granting of planning permission.

7.1.4 The Travel Plan which accompanies this Transport Statement outlines measures which would be implemented to promote sustainable travel modes for journeys to and from the site by all site users. An updated Delivery and Servicing Management Plan has also been prepared in support of the proposed extension.

PLANS



BUS SUMMARY

Service	Stops	Typical Frequency		Route
		Weekdays	Weekends	
1	M/P/S	6-10 mins	8-13 mins	Towards Canada Water
7	W	8-10 mins	8-12 mins	Towards East Acton
8	H/K/R	4-8 mins	6-12 mins	Towards Oxford Circus
19	B/F	7-10 mins	7-11 mins	Towards Battersea Bridge, South Side
25	H/K/R	4-8 mins	4-9 mins	Towards Oxford Circus
38	B/F	2-6 mins	3-8 mins	Towards Victoria
55	B/F	5-9 mins	7-13 mins	Towards Oxford Circus
59	M/N	5-9 mins	7-13 mins	Towards King's Cross
68	M/N	6-10 mins	6-13 mins	Towards Euston
91	M/N	6-10 mins	7-11 mins	Towards Crouch End
98	F/J/R	6-9 mins	6-12 mins	Towards Holborn
168	M/N	5-8 mins	6-12 mins	Towards Hampstead Heath
171	M/P	7-10 mins	7-12 mins	Towards Catford
188	M/N	7-10 mins	7-12 mins	Towards North Greenwich
242	H/K/Q/S	6-9 mins	5-14 mins	Towards Tottenham Court Road
243	M/P	5-8 mins	7-12 mins	Towards Waterloo
521	H/K/M	2-5 mins	No Service	Towards London Bridge
N1	M/P/S	30 mins	20 mins	Towards Thamesmead
N7	W	30 mins	30 mins	Towards Northolt
N8	H/K/R	20 mins	7-8 mins	Towards Oxford Circus
N19	B/F	30 mins	20 mins	Towards Clapham Junction
N35	B/F	30 mins	11 mins	Towards Tottenham Court Road
N38	B/F	10-12 mins	4-6 mins	Towards Victoria
N41	B/F	30 mins	20 mins	Towards Trafalgar Square
N55	B/F	30 mins	15 mins	Towards Oxford Circus
N68	M/P/S	30 mins	30 mins	Towards Old Coulsdon
N91	M/N	30 mins	15 mins	Towards Cockfosters
N98	F/J/R	15 mins	10 mins	Towards Holborn
N171	M/P	30 mins	30 mins	Towards Hither Green
N207	F/R	15 mins	7-8 mins	Towards Uxbridge
X68	M/N	15-20 mins	No Service	Towards Russell Square

LEGEND

- SITE LOCATION
- RAILWAY STATION
- RAILWAY
- BUS STOPS
- SIGNED OR MARKED CYCLE ROUTES
- 1KM WALK ISOCHRONE
- RETAIL
- LEISURE
- EDUCATION
- HEALTH CARE
- BUSINESS
- SANTANDER CYCLE HIRE DOCK
- CIRCLE LINE
- DISTRICT LINE
- NORTHERN LINE
- PICCADILLY LINE
- CENTRAL LINE

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Transport Planning and Infrastructure Design Consultants
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Tel: 01483 861681 Fax: 01483 861682 www.rgp.co.uk

Client: The Hoxton

Project: Hoxton Holborn Bedroom Extension

Title: Site Location and Accessibility Plan

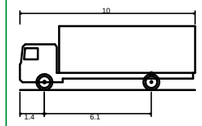
Job No:	Drawn By:	Checked By:
16/3197	JLM	PJB

Date:	Plan No:	Rev:
July 2016	Plan 01	-

DRAWINGS

A3

NOTES



FTA Design HG Rigid Vehicle (1998)

Overall Length	10.000m
Overall Width	2.500m
Overall Body Height	3.645m
Min Body Ground Clearance	0.440m
Track Width	2.470m
Lock to lock time	3.00s
Kerb to Kerb Turning Radius	11.000m

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Client
The Hoxton

Project
Hoxton Holborn
Bedroom Extension

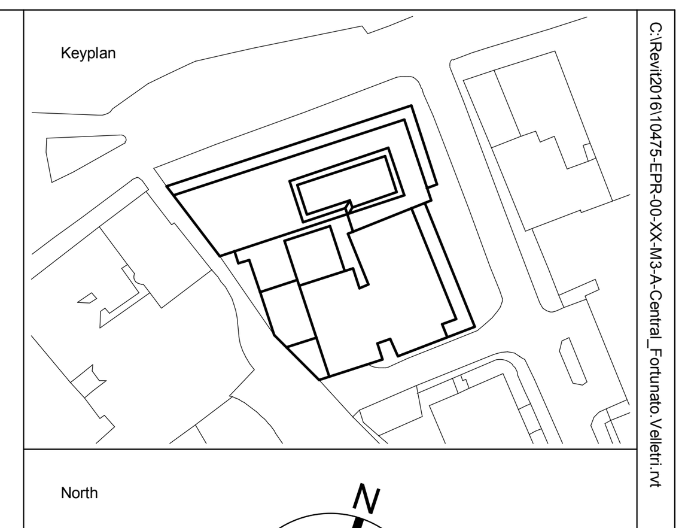
Drawing Title
Swept Path Analysis

Scale	Drawn By	Checked By	Approved By
1:200	GSE	PJB	NDR

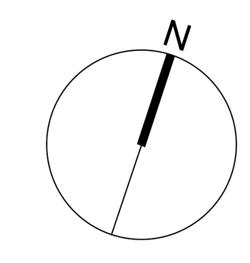
Date	Drawing No.	Rev.
December 2016	2016/3197/001	D

APPENDIX A

Keyplan



North



Notes:

1. Do not scale off this drawing for purposes other than in connection with the planning application.
2. EPR Architects accepts no liability for use of this drawing by parties other than the party for whom it was prepared or for purposes other than those for which it was prepared.

No.	Revision	Date	Initial	Chk'd
3	TP Issue	09.12.16	FV	
2	Issued for Information	01.12.16	FV	
1	First Issue	18.11.16	FV	

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15/12/2016 12:38:38

Summary of Proposed Rooms:

Level 01 : 8 Guestrooms (1 Accessible)
Level 02 : 8 Guestrooms (1 Accessible)
Level 03 : 8 Guestrooms (1 Accessible)
Level 04 : 7 Guestrooms (1 Accessible)
Level 05 : 19 Guestrooms

Existing Room Count : 174 (18 Accessible)
Rooms Lost : -4
Net Rooms Gain : 46

Proposed Room count : 220 Guestrooms (22 Accessible)

1.These areas have been calculated as NIA and relate to the anticipated areas of the building at the current state of the design and measured using preliminary drawings. The following factors should be considered before using these areas in any financial or other exercise:
- Further design development may affect the areas
- The building may present anomalies in relation to surveyed/drawn plans
- Construction tolerances may affect the areas

2. The record information contained in this drawing is issued for information purposes only and is subject to confirmation on site. EPR accepts no liability for any losses however incurred arising out of or in connection with the use of this information.

LEGEND:

FE - Fire Escape

FOR INFORMATION

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Hoxton Hotel Extension
199-206 High Holborn London WC1V 7BD

Proposed Ground Floor Plan

Project Status 1:100@ A1 11/18/16

Project No	Originator	Zone	Level	Type	Role	Number	Rev
10475	EPR	00	GF	TP	A	0230	3

APPENDIX B

Design

Limited detailed design information have been provided, therefore we are unable to comment on the precise design of the scheme.

Nonetheless it is considered that the principle of infilling to the rear of the hotel is likely to be considered acceptable. The site is not overly visible from the public realm and is currently only a service yard. Infilling this area would allow for the service yard to be hidden from view and potentially allow for a high-quality structure above which improves the overall appearance of the area.

The host building is of a modular, repeating, concrete clad form and whilst we would not expect this treatment to be continued within the new extension there should be an element of animation and repeating form to add visual interest (a flush/smooth or blank façade would be discouraged. The documents submitted indicate that the infill extension would be clad in a lightweight anodized bronze cladding; this would most likely be an acceptable material/colour, other options which could be explored are copper or CorTen steel which could provide an interesting relationship with the host building and surrounding area if the detailed façade design is of a high quality.

If it can be demonstrated that an additional roof extension on the existing rear wing is acceptable then a lightweight design set well back from the parapets; perhaps incorporating materials from the infill extension would be the most appropriate solution.

At our site meeting it was discussed that a green/living wall or façade could be considered; we would encourage this option to be explored and would welcome an inclusion of green/living walls and facades. It is noted that the flank retaining wall facing onto the site is blank and unattractive and would be suitable for a green wall.

Amenity

The area is located within a very residential area, with dwellings in the block directly adjacent to the infill location, and across the road from the existing rear wing where the roof extension is proposed.

Any development will need to take into account issues of sunlight/daylight, overlooking/privacy, construction matters and guest management. The hotel has submitted a number of planning applications in recent years and should be aware of the type of concerns which will be raised.

Therefore a thorough, detailed, and accurate Sunlight/Daylight statement must be submitted with the application demonstrating that there would be no significant detrimental impact from any aspect of the scheme on neighbouring residents.

Given the proximity of the infill to the residential block there are concerns that overlooking may be an issue. This will need to be explored by the applicant and methods may need to be put in place to reduce overlooking (including the perception of being overlooked) – which could include louvres, window layout/design/angle, screening with planting etc. Similarly this would apply to the roof extension which could also impact upon properties on Newton Street.

Noise and other disruption during construction may also be an issue and this will need to be addressed by way of a construction management plan (further details in the transport section below).

Given the size the proposal and the increase in the number of rooms a management plan for servicing and guests will need to be secured by s106 agreement to ensure there is no additional impact on the surrounding area.

The council seeks to ensure that the level of noise/vibration from all plant and machinery does not increase existing ambient noise levels, therefore planning permission will only be granted for plant and machinery if it can be operated without causing a loss to local amenity and does not exceed the thresholds set out in the Replacement UDP 2006.

Any proposed AC units etc will require the submission of a noise impact assessment.

Transport

Disabled Parking:

We are unable to support the loss of disabled parking, their provision was set as a planning condition in the application in 2011 (2011/4914/P) in condition 5 “no more than 4 cars are to be parked at any one timie within the approved car parking spaces which shall be provided to full wheelchair standards and shall be permanently retained and maintained for the parking of registered disabled vehicles only unless otherwise agreed by the local planning authority in writing.”. Current parking standards for disabled users C1-Hotel use is as follows.

C1 - HOTELS	
Vehicle Type	**Standard**
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Resident - from threshold of 2,500 sq m, 1 space per 1,250 sq m or part thereof.

The provision of disabled bays will need to be increased in accordance with this requirement or robust justification including parking assessments and transport statements will need to be provided to explain why the scheme cannot be policy compliant.

Historic Planning Conditions

The following condition would have to be maintained from a previous application on site (2011/4914/P)

2: No customers shall be picked up or dropped off by coach at any time either directly outside the hotel or within the service yard.
3: No vehicular service deliveries or collections to or from the hotel shall take place outside of the hours 07:30-18:00 on any day of the week.
6 which refers to the 20 cycle parking spaces that need to be maintained and you will also have to increase this number to reflect the uplift in spaces. Please refer to the London plan for additional requirements; however an increase of 47 bedrooms equates to 3 Long stay spaces and 1 short stay.

Construction Management Plan

Given the central London location, the scale of the scheme, the number of the large schemes currently proposed or under construction in the area and the proximity to residential properties a detail Construction Management Plan will be required to be secured by s106.

It is advised that a draft is submitted at application stage for review by the Council's transport team. The CMP should follow the council's Pro-Forma, attached for reference.

Conditions and Obligations to be sought for transport issues

- Service Management Plan
- Construction Management Plan
- Travel Plan
- Financial contribution towards pedestrian and transport improvements in the area likely and to be negotiated at application stage.

Access

The Council's access officer has provided the following response:

The London Plan requires that 10% of bedrooms are accessible, it is not clear if this is the case. An accessible hotel bedroom requires an associated car parking space so the loss of spaces on site is very disappointing.

It appears that the applicants are providing accessible hotels bedrooms but the bathrooms don't appear to meet the Building Regulations and so detailed plans should be provided for these. Where more than one accessible bedroom is provided a choice of left and right hand transfer should be provided and a choice of shower and bath. Bathrooms are slightly large in dimension than showers and so detailed plans of these should be submitted. The 10% accessible bedrooms should also be conditioned.

Sustainability

Energy Statement

The applicant will be expected to submit an Energy Statement showing how the development will meet the following policy requirements:

- Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2011) Chapter 5 (particularly Policy 5.2) to secure a minimum of 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013, for the new build areas. GLA guidance on preparing energy assessments and CPG3 should be followed. [NOTE: Decentralised Energy Priority Areas are shown on this map]
- CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement.
- Where the London Plan carbon reduction target cannot be met on-site, we may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £60/tonne CO2/ yr over a 30 year period), which will be used to secure the delivery of carbon reduction measures elsewhere in the borough. Further information on this can be found here.

The applicant should also include details of overheating assessments.

Sustainability Statement

The applicant will be expected to submit a Sustainability Statement - the detail of which to be commensurate with the scale of the development showing how the development will:

- Implement the sustainable design principles as noted in policy DP22 including (but not limited to) measures outlined in the table below.

Design	Fabric/Services
• the layout of uses • floorplates size/depth • floor to ceiling heights • location, size and depth of windows • limiting excessive solar gain • reducing the need for artificial lighting • shading methods, both on or around the building • optimising natural ventilation • design for and inclusion of renewable energy technology • impact on existing renewable and low carbon technologies in the area • sustainable urban drainage, including provision of a green or brown roof • adequate storage space for recyclable material, composting where possible • bicycle storage • measures to adapt to climate change (see below) • impact on microclimate	• level of insulation • choice of materials, including - responsible sourcing, re-use and recycled content • air tightness • efficient heating, cooling and lighting systems • effective building management system • the source of energy used • metering • counteracting the heat expelled from plant equipment • enhancement of/provision for biodiversity • efficient water use • re-use of water • educational elements, for example visible meters • on-going management and review

- Achieve a BREEAM 'Excellent' rating (minimum) and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%) for the non-residential areas.
- We will also expect all major developments (particularly water intensive developments like hotels) to incorporate greywater harvesting, unless demonstrated to be unfeasible (evidence will need to be provided)
- The applicant should also provide details for how any materials will be reused/ recycled.
- The development will be expected to incorporate a green roof/s (see Nature Conservation and Biodiversity point below)

Sustainable drainage and Flooding

The applicant will be expected to:

- Submit a Flood Risk Assessment if >1ha. Developments in areas known to be at risk of surface water flooding must be designed to cope with being flooded.
- Achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in existing run off rates. Please note: this is 50% of all peak storm events up to and including the 1:100 year storm event. Where variable discharge rates are not achievable then the applicant will be required to target 50% of the 1:1 year peak storm event. Volumes will need to be constrained for the 1 in 100 year (plus 30% uplift for climate change) 6 hour storm event. This should be achieved through implementing SuDS unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014).

When designing SuDS the development should follow the drainage hierarchy in policy 5.13 of the London Plan below:

- store rainwater for later use
- use infiltration techniques, such as porous surfaces in non-clay areas
- attenuate rainwater in ponds or open water features for gradual release
- attenuate rainwater by storing in tanks or sealed water features for gradual release

- discharge rainwater direct to a watercourse
- discharge rainwater to a surface water sewer/drain
- discharge rainwater to the combined sewer

We would be keen to see SuDS which provide biodiversity/amenity benefits proposed.

This information above should be provided in the form of a Surface Water Drainage Statement. The applicant should submit full details, including drainage plans (showing location and extent of SuDS, invert levels, site levels and exceedance flow routes), Microdrainage modelling results (modelling the whole drainage system) evidencing that no flooding occurs in the proposed system up to and including the 1:100 year + climate change 6 hour storm event, and maintenance plans (including maintenance activity, frequency, responsibility and access requirements). The applicant should also complete and submit the Drainage Pro-forma found on this page.

The applicant should also refer to the SFRA when completing Surface Water Drainage Statements and undertaking Flood Risk Assessments.

Air Quality

Due to the scale of the development, the applicant will be required to submit an Air Quality Assessment (AQA). This page contains further details for when we require an AQA. We recommend that developers follow the EPUK Land-Use Planning & Development Control: Planning For Air Quality Guidance when doing an AQA. The AQA will need to clearly outline the methodology and include an assessment of the impact of the development on local air quality during operation (Air Quality Neutral Assessment) and construction, as well and impacts of local air quality on occupants. Details of any mitigation measures should be clearly outlined in the assessment.

All developments are expected to meet the Mayor's Air Quality Neutral requirements. If CHP is proposed then the CHP standards set out in the Mayor's Sustainable Design and Construction SPG must be met. We will also look to see stack heights and locations are carefully designed to limit sensitive receptor exposure and that any other relevant mitigation measures are put in place.

We expect developers to follow The Mayors SPG on Control of Dust and Emissions, in their AQAs and Construction Management Plans (CMP). Mitigation measures appropriate to the identified level of risk should be included and stated within the AQA. These will then be secured through the CMP.

We also have an air quality checklist which we expect to be completed and included within all AQAs.

The LAQM website includes our AQ progress reports from monitoring as well as the AQ action plan – these should be used to inform all AQAs.

Nature Conservancy and Biodiversity

All developments in the Borough should be compliant with the ecology, nature conservation and biodiversity requirements of the London Plan, as well as Camden's Core Strategy and Development policies, and comply with the mitigation hierarchy (information, avoidance, mitigation, compensation, additional benefits) set out within these policies. CPG3 provides further guidance on how these policies should be met. The text below summarises the key policy requirements but the policy documents should be referred to for full detailed requirements.

- All Major developments are required to submit an Ecology Scoping Study ("Ecological Appraisal") unless previously agreed with Nature Conservation officer.
- Any development on or adjacent to designated sites (SINCS, SSSI, Local Nature Reserves (LNR), Habitat corridors and Habitat Corridor – missing links) should receive special attention proportionate to the weight afforded by these designations.
- CPG3 trigger list on p101 outlines which developments will require a protected species survey.
- Proposals should demonstrate:
  - how biodiversity considerations have been incorporated into the development;
  - if any mitigation measures will be included; and
  - what positive measures for enhancing biodiversity are planned.

  Further advice on landscaping for biodiversity can be found in CPG 3 and Camden's Biodiversity Action Plan - Appendix 5.

Lighting can have particular negative impacts on biodiversity. Unnecessary lighting should be avoided. Where lighting may harm biodiversity, timers or specific coloured lighting will be required to minimise any disturbance.

The Council will expect all developments to incorporate brown roofs, green roofs and green walls unless it is demonstrated this is not possible or appropriate. This includes new and existing buildings. Special consideration will be given to historic buildings to ensure historic and architectural features are preserved. See CPG3 and Camden's Biodiversity Action Plan - Appendix 4 for further advice on green roof and living wall design. The Council would like to see biodiverse living roofs incorporated as opposed to seedum roofs. I've also attached two advice notes on living walls and roofs as well as landscaping.

Economic Development

According to the documents provided, the scheme would involve an uplift of 1154 sq. m of commercial floorspace. Camden would therefore require the developer to assist with training and employment initiatives via the S106 Agreement.

Should the scheme go ahead, Economic Development would seek to secure the following in order to maximise the opportunities to local residents and businesses afforded by the proposed development:

- The applicant should work to **CITB benchmarks for local employment** when recruiting for construction-related jobs as per clause 8.28 of CPG8.

- The applicant should advertise all construction vacancies and work placement opportunities **exclusively with the King's Cross Construction Skills Centre** for a period of 1 week before marketing more widely.

- The applicant should provide a specified number (to be agreed) of **construction or non-construction work placement opportunities** of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.

- If the build costs of the scheme exceed £3 million the applicant must recruit 1 **construction or non-construction apprentice** per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.

- If the value of the scheme exceeds £1 million, the applicant must also sign up to the **Camden Local Procurement Code**, as per section 8.30 of CPG8.

- The applicant provide a **local employment, skills and local supply plan** setting out their plan for delivering the above requirements in advance of commencing on site.

We would request that a proportion of the overall apprenticeships and work placements provided were delivered upon completion of the development in accordance with CPG 8.33.

A financial contribution to assist local residents to receive training in the skills that would enable them to access the jobs created by the new development would also be sought. On the basis of the current proposals, a contribution of £ 27,965 would be sought and calculated as follows.

No of bedrooms x 0.5 [number of employees per bedroom] = 87
Full time jobs created x 23% [% of Camden residents in the workforce] x 35% [% of employees requiring training] x £3,995 [£ per employee requiring training] = £27,965.

Consultation

Given the location and sensitivities of the site, together with the scale of the scheme, it is recommended that the applicant conducts its own consultation with surrounding neighbours, relevant councillors and local groups. Whilst there is no statutory obligation to do this, it would allow for local residents and stakeholders to view your proposals, provide comments and hopefully allow the applicant to address any points raised prior to the application being submitted.

Once an application is submitted the Council will carry out statutory consultation in accordance with our Statement of Community Involvement.

Conclusion

The principle of an infill extension in this location is likely to be acceptable dependent on detailed design and impact on neighbouring amenity.
The principle of a roof extension on the existing rear wing is less likely to be acceptable; however it would be for the applicant to clearly demonstrate that there would be no visual or amenity impacts should they wish to pursue this approach.

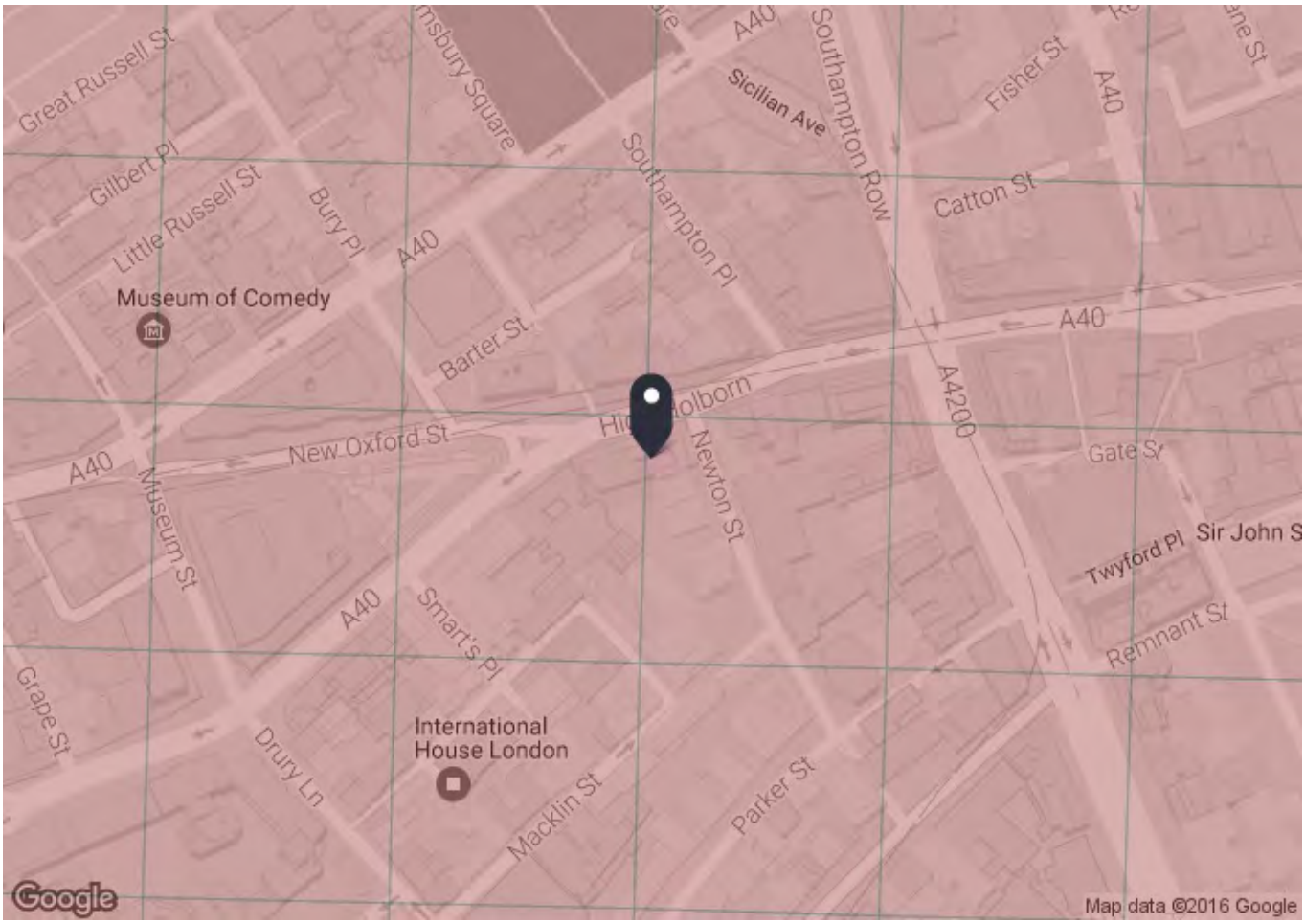
The Council will aim to negotiate on-site housing in the absence of robust justification to demonstrate that this is not possible. Any viability assessments submitted will need to be independently assessed at the applicant's expense.

A number of sustainability documents will be required to be submitted, please note the requirements as set out above. Green walls, facades and roofs are strongly encouraged and required where possible. Furthermore the use of bird/bat boxes should also be incorporated into the design.

This represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

APPENDIX C

TRANSPORT FOR LONDON



PTAL output for 2011 (Base year)
6b

199-206 High Holborn, London WC1V 7BD, UK

Easting: 530399, Northing: 181477

Grid Cell: 85342

Report generated: 06/12/2016

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)

Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	COVENT GARDEN RUSSELL STREET	RV1	627.41	6	7.84	7	14.84	2.02	0.5	1.01
Bus	HOLBORN STATION KINGSWAY	59	229.15	10	2.86	5	7.86	3.81	0.5	1.91
Bus	HOLBORN STATION KINGSWAY	243	229.15	11	2.86	4.73	7.59	3.95	0.5	1.98
Bus	HOLBORN STATION KINGSWAY	521	229.15	27	2.86	3.11	5.98	5.02	1	5.02
Bus	HOLBORN STATION KINGSWAY	91	229.15	9	2.86	5.33	8.2	3.66	0.5	1.83
Bus	HOLBORN STATION KINGSWAY	68	229.15	9	2.86	5.33	8.2	3.66	0.5	1.83
Bus	HOLBORN STATION KINGSWAY	X68	229.15	4	2.86	9.5	12.36	2.43	0.5	1.21
Bus	HOLBORN STATION KINGSWAY	188	229.15	8	2.86	5.75	8.61	3.48	0.5	1.74
Bus	HOLBORN STATION KINGSWAY	171	229.15	7.75	2.86	5.87	8.74	3.43	0.5	1.72
Bus	HOLBORN STATION KINGSWAY	168	229.15	9	2.86	5.33	8.2	3.66	0.5	1.83
Bus	BLOOMSBURY SQUARE	38	265.85	10	3.32	5	8.32	3.6	0.5	1.8
Bus	BLOOMSBURY SQUARE	19	265.85	8	3.32	5.75	9.07	3.31	0.5	1.65
Bus	BLOOMSBURY SQUARE	55	265.85	10	3.32	5	8.32	3.6	0.5	1.8
Bus	HIGH HOLBORN NEWTON ST	8	117.65	10	1.47	5	6.47	4.64	0.5	2.32
Bus	HIGH HOLBORN NEWTON ST	242	117.65	6.5	1.47	6.62	8.09	3.71	0.5	1.86
Bus	HIGH HOLBORN NEWTON ST	25	117.65	8	1.47	5.75	7.22	4.15	0.5	2.08
Bus	HIGH HOLBORN NEWTON ST	1	117.65	8	1.47	5.75	7.22	4.15	0.5	2.08
Bus	BLOOMSBURY ST SHAFTESBURY AVE	24	452.38	10	5.65	5	10.65	2.82	0.5	1.41
Bus	BLOOMSBURY ST SHAFTESBURY AVE	134	452.38	12	5.65	4.5	10.15	2.95	0.5	1.48
Bus	BLOOMSBURY ST SHAFTESBURY AVE	29	452.38	15	5.65	4	9.65	3.11	0.5	1.55
Bus	BLOOMSBURY ST SHAFTESBURY AVE	176	452.38	8.5	5.65	5.53	11.18	2.68	0.5	1.34
Bus	BLOOMSBURY ST SHAFTESBURY AVE	14	452.38	13	5.65	4.31	9.96	3.01	0.5	1.51
Bus	BLOOMSBURY STREET	10	598.68	4.5	7.48	8.67	16.15	1.86	0.5	0.93
Bus	BLOOMSBURY STREET	390	598.68	8	7.48	5.75	13.23	2.27	0.5	1.13
Bus	BLOOMSBURY STREET	73	598.68	18	7.48	3.67	11.15	2.69	0.5	1.35
Bus	BRITISH MUSEUM	98	397.9	9	4.97	5.33	10.31	2.91	0.5	1.46
LUL	Tottenham Court Road	'Ealing-Loughton'	692.53	1	8.66	30.75	39.41	0.76	0.5	0.38
LUL	Tottenham Court Road	'Morden-Edgware'	692.53	4.67	8.66	7.17	15.83	1.9	0.5	0.95
LUL	Tottenham Court Road	'HighBarnet-Morden'	692.53	0.33	8.66	91.66	100.32	0.3	0.5	0.15
LUL	Tottenham Court Road	'Kennington-Edgware'	692.53	14.67	8.66	2.79	11.45	2.62	0.5	1.31
LUL	Tottenham Court Road	'HighBarnet-Kenningt'	692.53	5.33	8.66	6.38	15.04	2	0.5	1
LUL	Tottenham Court Road	'MillHill-Morden'	692.53	1.67	8.66	18.71	27.37	1.1	0.5	0.55
LUL	Tottenham Court Road	'MillHillE-Kenningt'	692.53	1.67	8.66	18.71	27.37	1.1	0.5	0.55
LUL	Holborn	'Epping-Ealing'	227.95	3	2.85	10.75	13.6	2.21	0.5	1.1
LUL	Holborn	'Epping-Wruislip'	227.95	3	2.85	10.75	13.6	2.21	0.5	1.1
LUL	Holborn	'RuislipGar-Epping'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'WhiteCity-Epping'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Epping-NActon'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'Epping-Northolt'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Debden-WRuislip'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'WhiteCity-Debden'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Debden-Northolt'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'RuislipGdns-Debden'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Loughton-WRuislip'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'NActon-Loughton'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'RuislipGdns-Loughton'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'Loughton-WhiteCity'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'Loughton-Northolt'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Ealing-NewburyPark'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'WRuislip-NewburyPark'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'NActon-NewburyPark'	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Hainault-Ealing'	227.95	5.33	2.85	6.38	9.23	3.25	0.5	1.63
LUL	Holborn	'Hainault-Nacton'	227.95	1.33	2.85	23.31	26.16	1.15	0.5	0.57
LUL	Holborn	'Hainault-WRuislip'	227.95	3.33	2.85	9.76	12.61	2.38	0.5	1.19
LUL	Holborn	'RuislipGdns-NP-Hain'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'Hainault-WhiteCity'	227.95	1.67	2.85	18.71	21.56	1.39	0.5	0.7
LUL	Holborn	'Hainault-NP-Northolt'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'GrangeHill-WD-Eal'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
LUL	Holborn	'GrangeHill-Wdfd-Whit'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'GrangeHill-Wdfd-WRsp'	227.95	0.67	2.85	45.53	48.38	0.62	0.5	0.31
LUL	Holborn	'Cockfosters-LHRT4LT '	227.95	4.67	2.85	7.17	10.02	2.99	0.5	1.5
LUL	Holborn	'RayLane-Cockfosters '	227.95	3.67	2.85	8.92	11.77	2.55	0.5	1.27
LUL	Holborn	'LHRT4LT-ArnosGrove '	227.95	4.67	2.85	7.17	10.02	2.99	0.5	1.5
LUL	Holborn	'ArnosGrove-RayLane '	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'ArnosGrove-Nthfields'	227.95	3	2.85	10.75	13.6	2.21	0.5	1.1
LUL	Holborn	'Oakwood-RayLane '	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Nthfields-Cockfoster'	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'LHRT5-Cockfosters '	227.95	6	2.85	5.75	8.6	3.49	1	3.49
LUL	Holborn	'Uxbridge-Cockfosters'	227.95	3.67	2.85	8.92	11.77	2.55	0.5	1.27
LUL	Holborn	'Ruislip-Cockfosters '	227.95	2.33	2.85	13.63	16.47	1.82	0.5	0.91
LUL	Holborn	'ArnosGrove-Uxbridge '	227.95	1	2.85	30.75	33.6	0.89	0.5	0.45
LUL	Holborn	'Oakwood-Uxbridge '	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
LUL	Holborn	'Oakwood-Ruislip '	227.95	0.33	2.85	91.66	94.51	0.32	0.5	0.16
									Total Grid Cell AI:	**75.72**