



**GL Hearn**

Part of Capita Real Estate

# Planning Statement

**Camden Lifestyle (UK) Ltd**

7ABC Bayham Street, London, NW1 0EY

July 2018

## **Prepared by**

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## Quality Standards Control

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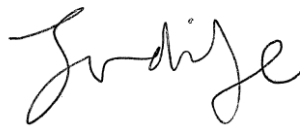
This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

**DATE**

31<sup>st</sup> July 2018

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**Limitations**

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

## 1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by GL Hearn on behalf of Camden Lifestyle (UK) Ltd ('the applicant') in support of an application for full planning permission ('the/this Application') for the demolition of existing buildings and erection of a new 5 storey building comprising office floorspace (B1a Use Class), hotel accommodation (C1 Use Class) and an ancillary café/bar at 7ABC Bayham Street, London, NW1 0EY ('the Site').

### The Proposed Development

- 1.2 The proposed description of development is as follows:

*"Full Planning Application for the demolition of existing buildings (B1a Use Class) and erection of a part 3, part 4, part 5 storey building (with two basement levels), comprising co-working office floorspace (B1a Use Class), hotel accommodation (C1 Use Class) and an ancillary café/bar and fitness facilities; works to the existing access and associated works."*

- 1.3 The full detail of the proposed development is set out within Section 3 of this Statement and within the Design & Access Statement, but in summary it comprises:

- Demolition of existing buildings on (530 sqm GIA of B1a office space);
- Erection of a new part 3, part 4 and part 5 storey building, and 2 basement levels;
- 691 sqm (GIA) of new co-working office floorspace (B1a Use Class);
- 61 No. of hotel bedrooms (including 8 accessible rooms – 13%);
- An ancillary café/bar at ground floor – open to both guests, office workers and the public;
- Servicing from Bayham Street;
- 16 No. cycle parking spaces for guests and staff at basement level 1; and
- Zero car and coach parking (to be controlled through a Section 106 Agreement).

### The Applicant

- 1.4 The applicant, Camden Lifestyle (UK) Ltd, is an SPV (special purpose vehicle) created by GMG Real Estate ('GMG RE') for this development and future operation of the proposed development.
- 1.5 Since 2005, GMG RE has sourced, structured, invested, developed and managed over USD \$2bn of real estate assets. Since 2013, GMG RE have focused their attention and efforts on the London market, where their key objective has been to identify and redevelop underutilised sites which are not fulfilling their potential, with the aim of improving and holding these assets for the long term.
- 1.6 In the past 5 years, GMG RE have been involved in a number of projects in the London Borough of Camden, including:
- Wells Court, Oriel Place, Hampstead;

- 10-12 Kentish Town Road, Camden;
- 8 Kentish Town Road, Camden;
- 48-56 Bayham Place, Camden; and
- 18 Vine Hill, Clerkenwell (The Ragged School)

- 1.7 For the development at 7ABC Bayham Street, the intention is to own, operate and manage both the hotel and the co-working space.

### Background to the Proposals

- 1.8 7ABC Bayham Street is a commercial site, and comprises 530 sqm of office floorspace (B1a use class) amongst three separate buildings.
- 1.9 The Site constitutes under-utilised previously developed land within a highly accessible and sustainable location. The Site has a Public Transport Accessibility Level (PTAL) of 6b which is considered 'excellent'; and is located approximately 100m north-east of Mornington Crescent underground station, 400m south of Camden underground station and 900m north of both Euston station and King's Cross/St Pancras station.
- 1.10 The Site is located adjacent to Camden High Street within an area that is commercial in character, which also comprises residential development.
- 1.11 The Site is located within Sub Area 1 ('Commercial') of the Camden Town Conservation Area.
- 1.12 The southern end of Bayham Street, and the immediate context of the site, has seen extensive regeneration in recent years which highlights the dynamism of the locality. This is discussed within the following section of this Statement in further detail and within the Design and Access Statement.
- 1.13 Having regard to the continual change in this part of Camden, the applicant's vision and brief for this development proposal was to deliver a high quality mixed use development comprising co-working office and hotel uses, with synergy between these uses, to be operated as a single entity. The intention has been to provide a facility that would support the local creative industries/'TMT' sector and SME's, whilst capitalising on the ever-strong tourist economy in Camden.
- 1.14 The development proposal has been fully informed by a comprehensive and constructive pre-application process, which has included 4 pre-application meetings with Camden's Planning and Economic Development Officers, 2 Design Review Panel meetings and is submitted with their support.

- 1.15 The proposed development has also been discussed with other stakeholders including neighbours, amenity groups and Councillors. The scheme has since evolved to take into account the comments made by these parties.

### Submission Documents

- 1.16 In accordance with the list of validation requirements agreed through the Planning Performance Agreement, this Planning Application comprises the following suite of documents, in addition to this Planning Statement:
- Application Form;
  - Location Plan;
  - Site Plan;
  - CIL Form;
  - Design and Access Statement;
  - Plans, Elevations and Sections;
  - Statement of Community Involvement;
  - Heritage Assessment;
  - Archaeology Note;
  - Ecology Report;
  - Energy and Sustainability Statement;
  - Transport Statement and Travel Plan;
  - Servicing Management Plan;
  - Site Waste Management Plan;
  - Hotel Demand Statement;
  - Basement Impact Assessment;
  - Air Quality Assessment;
  - Noise and Vibration Impact Assessment;
  - Daylight/Sunlight Assessment; and
  - Geo-Environmental Report.
- 1.17 A Schedule of Submission Documents is provided with the application for ease of reference.

### Purpose and Structure of the Statement

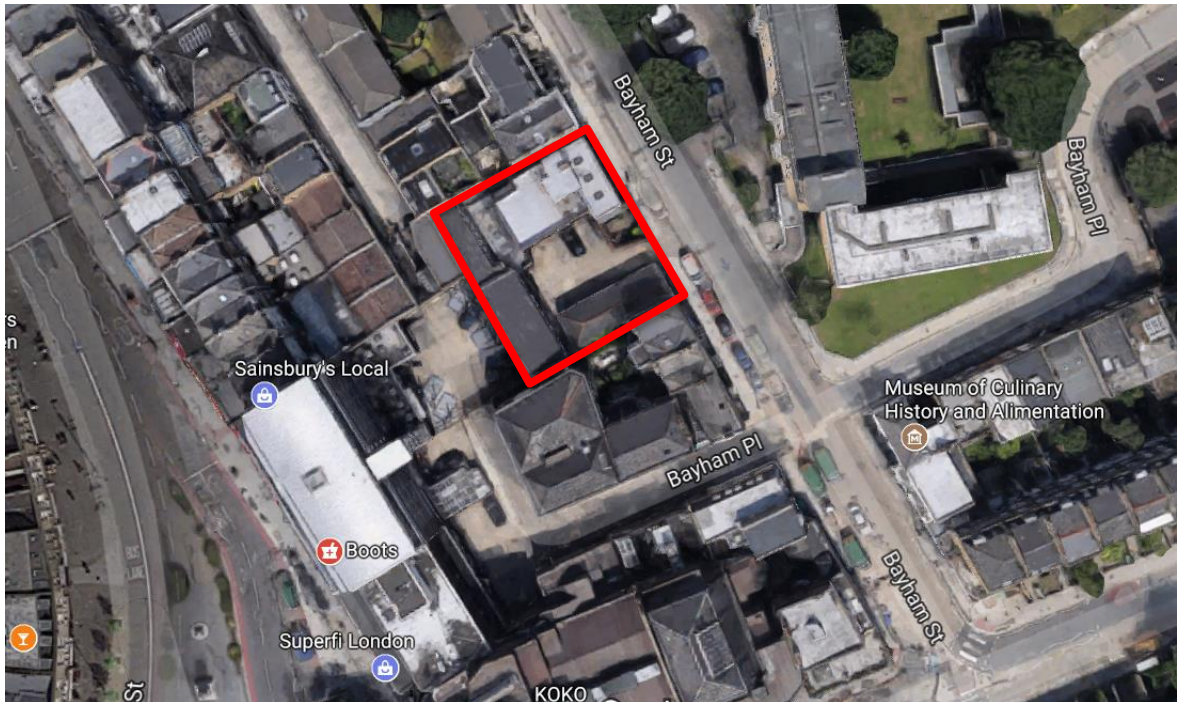
- 1.18 The purpose of this Statement is to provide a justification in 'town planning' terms for the proposed development; to assess the scheme against the development plan and draw on other material considerations to provide a robust justification for the development.
- 1.19 The Statement is structured as follows:
- **Section 2** sets out an overview of the Site including consideration of its wider context and relevant planning history;

- **Section 3** describes the detail of the proposed development and summarises the response to pre-application comments;
- **Section 4** sets out the planning policy framework against which the proposed development should be assessed;
- **Section 5** assesses the proposals against the Development Plan, focussing on land use matters, design and heritage, transport, daylight and sunlight, energy and sustainability, noise, air quality, waste storage and collection, ecology, flood risk, and contamination;
- **Section 6** sets out the planning benefits of the scheme including the economic and heritage benefits; and
- **Section 7** concludes the Planning Statement and makes clear the reasons why the scheme should be approved in line with National Planning Policy Framework and the Development Plan.

## 2 SITE, SURROUNDINGS AND PLANNING HISTORY

### The Site and Relevant Planning History

- 2.1 The Site lies on the western side of Bayham Street and backs on to the rear of the buildings that front Camden High Street. The Site is identified in **Figure 1** below.



**Figure 1 - The Site**

- 2.2 The Site comprises three existing buildings which are situated around a central area of hardstanding. 7A and 7C are two storeys in height, whilst 7B is single storey. These buildings are in use as offices (Class B1a).
- 2.3 Access to the Site is from Bayham Street, which is 'one way' in the direction of Crowndale Road. The Site is otherwise locked by adjoining buildings and third party land. Bayham Place which passes behind the Site and terminates in a private car park is not in the applicant's ownership, and there are no rights to access the Site through this route.
- 2.4 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is considered 'excellent'. The Site is located approximately 100m north-east of Mornington Crescent underground station, 400m south of Camden underground station and 900m north of both Euston station and King's Cross/St Pancras station. Additionally, the Site is within walking distance to a number of bus stops.



- 2.5 The Site does not contain any statutory or non-statutory Listed Buildings, with the closest Listed Building, Camden Palace Theatre (Grade II Listed), approximately 50m away on Crowndale Road (now occupied by Koko).
- 2.6 The Site is located within Camden Town Conservation Area. This designation is discussed in more detail below.
- 2.7 The Site is located within Flood Zone 1 which is categorised as having the lowest potential risk of flooding.
- 2.8 Figure 2 below identifies the number of each building on-site.



**Figure 2 - Plan to identify the separate buildings on-site**

7A Bayham Street

- 2.9 As shown in Figure 2, the property 7A fronts onto Bayham Street and forms the northern boundary of the Site.
- 2.10 The existing property at 7A Bayham Street is a two storey office building (Class B1a – its lawful use – see application TP/36692/NW/8158 below).

- 2.11 The two storey property at 7A Bayham Street has been in office use since its erection in approximately 1958.

#### 7B Bayham Street

- 2.12 The existing property at 7B Bayham Street is a single storey building which fronts onto Bayham Street and forms the southern boundary to the Site. Available records on the Council's website suggest that the building pre-dates 1894, as shown on the historic Camden Town Conservation Area Map (see Figure 4).
- 2.13 In 1971 a change of use application was approved, converting the building to an office use (Class B1a) (see application CTP/K12/3/B/11570).

#### 7C Bayham Street

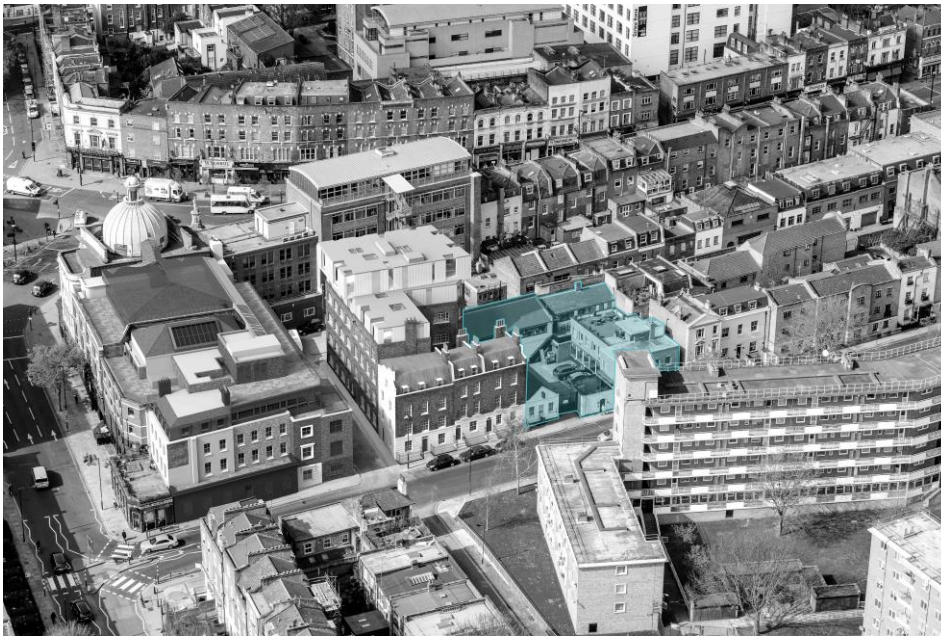
- 2.14 The existing property at 7C Bayham Street is a two storey building which forms the western boundary of the Site.
- 2.15 Whilst there are no relevant planning applications relating to 7C Bayham Street, it is understood that the building has been in office use (Use Class B1a) since its construction. Historic Conservation Area maps indicate that the building was constructed pre-1894.
- 2.16 During pre-application discussions it was confirmed that the buildings are of no architectural or historic value and are considered to be 'neutral' contributors to the character and appearance of the Camden Town Conservation Area.

### Surrounding Context

- 2.17 In the immediate surroundings of the Site, the prevailing height ranges from 3 to 6 storeys:
- To the north of the Site along Bayham Street, buildings are typically 3-4 storey. These buildings are typically residential in scale and character;
  - To the south at 3-7 Bayham Street, are three townhouses which are 4 storeys in height;
  - At 48-56 Bayham Place, immediately south-west of the Site is a 6 storey building comprising residential apartments;
  - Further south, the buildings that collectively comprise Koko (1A Camden High Street, Hope & Anchor PH 74 Crowndale Road, 1 Bayham Street and 65 Bayham Place) form a large mass that terminates Bayham Street and returns on to Crowndale Road. Koko is up to 4 storeys in height and has planning permission (2017/6058/P) to extend at roof level at the rear of the building, creating the equivalent of 5 storeys;
  - To the east is a series of post war residential blocks comprising 6 storeys;
  - To the west, buildings that front Camden High Street are typically 4-6 storeys, with the tallest building (6 storeys) immediately to the west of the Site, and comprising office floorspace; and

- To the west/north west of the Site are mews buildings (Kings Terrace) now in residential use. These buildings are typically of 2-3 storeys, some having been extended over time.

2.18 The extract below shows the Site in the context of the surrounding building heights and includes the recent addition to 48-56 Bayham Place.



**Figure 4 - Aerial View of the Site in the context of the local built form**

2.19 The extract above demonstrates the Site is of a lower density, of significantly less massing, and of notably less height than buildings fronting Bayham Street and Camden High Street.

### Other Relevant Planning History

#### **3-7 Bayham Street**

2.20 3-7 Bayham Street (immediately south of the Site) was the subject of a planning application (2016/6394/P) approved 16 March 2017 for the '*Erection of a mansard roof extension to Nos.3, 5 and 7 Bayham Street, two storey rear extension to No.3, the installation of windows to the flank wall facing Bayham Place and replacement windows to the front elevation.*'

2.21 This demonstrates that a building fronting the Street of four storeys in height was considered acceptable by Camden Council.

#### **48-56 Bayham Place**

2.22 A planning application (2017/2739/P) was approved on 25 October 2017 for the '*Erection of a part 2 part 3 storey roof extension to provide 9 self-contained units (4 x 1 bed, 4 x 2 bed and 1 x 3 bed) and rear extension at second floor level together with associated works*' at 48-56 Bayham Place.

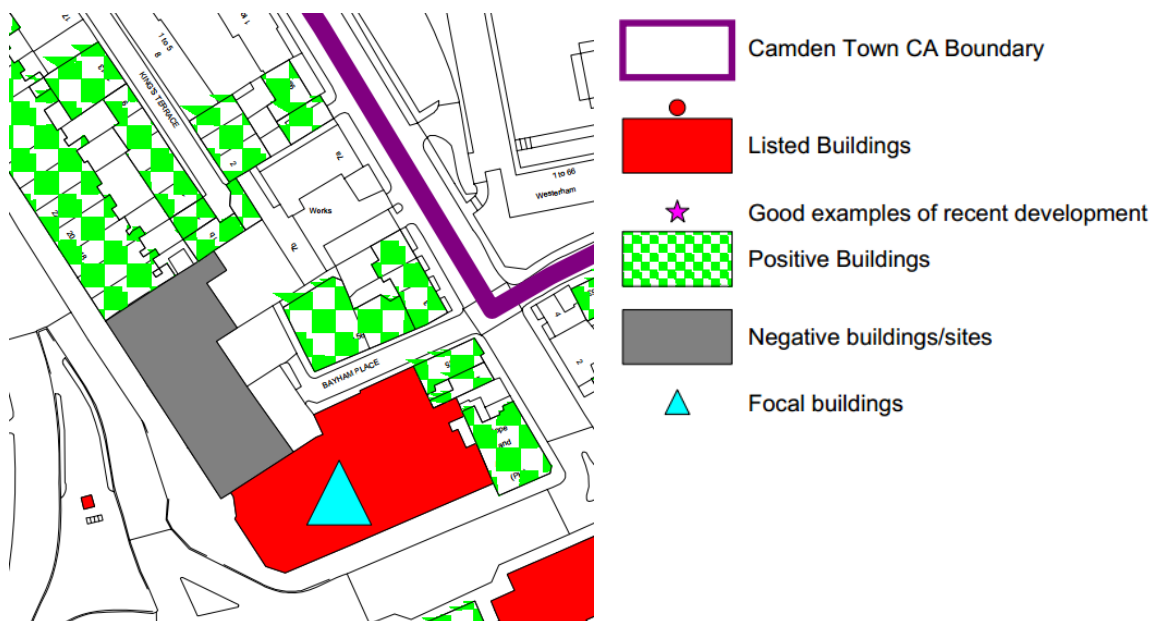
- 2.23 The approval of this application demonstrates that the Council have recognised that development height of up to 6 storeys is appropriate in this location.

**Koko 1A Camden High Street, Hope & Anchor PH 74 Crowndale Road, 1 Bayham Street and 65 Bayham Place**

- 2.24 The site to the south (Koko 1A Camden High Street, Hope & Anchor PH 74 Crowndale Road, 1 Bayham Street and 65 Bayham Place) was the subject of a planning application (2016/6959/P), approved on 15 November 2017, for: *'Redevelopment involving change of use from offices (Class B1) and erection of 5 storey building with basement to provide 32 bedroom hotel (Class C1) following demolition of 65 Bayham Place and 1 Bayham Street (retention of façade) including change of use at 1st and 2nd floor of 74 Crowndale Road from pub (Class A4) to hotel (Class C1), mansard roof extension to 74 Crowndale Road, retention of ground floor of Hope & Anchor PH (Class A4), conversion of flytower to ancillary recording studio and hotel (C1), creation of terraces at 3rd and 4th floor level and erection of 4th floor glazed extension above roof of Koko to provide restaurant and bar to hotel (C1).'*
- 2.25 This approval indicates that an increase in height can be justified in this location, and that this locality can support hotel accommodation.
- 2.26 On 2 May 2018, a revised application (2017/6058/P) was approved which sought the: *'Redevelopment involving change of use from offices (Class B1) and erection of 5 storey building at the corner of Bayham Street and Bayham Place to provide pub at ground floor and private members club (Class Sui Generis) on upper floors following demolition of 65 Bayham Place, 1 Bayham Street (façade retained) and 74 Crowndale Road (façades retained), including enlargement of basement and sub-basement, retention of ground floor and basement of Hope & Anchor PH (Class A4), change of use at 1st and 2nd floor from pub (Class A4) to private members club (Class Sui Generis), mansard roof extension to 74 Crowndale Road, creation of terraces at 3rd and 4th floor level, relocation of chillers and air handling unit to 3rd floor plant enclosure with additional plant (5x a/c condensers and 1 cooling unit) at roof level, erection of glazed canopy to Camden High Street and Crowndale Road elevation and erection of 4th floor glazed extension above roof of Koko to provide restaurant and bar to private members club (Sui Generis).'*
- 2.27 The main difference between the permission (2016/6959/P) and the revised (2017/6058/P) is that the revised scheme sought a private members club instead of a hotel. The massing and design remain largely the same as previously permitted.

## Heritage Context

- 2.28 The Site is in the Camden Town Conservation Area.
- 2.29 Camden Town Conservation Area was designated by the London Borough of Camden on 11th November 1986. Bayham Street was included within this designation when the boundary was extended in 1997.
- 2.30 The Site is located within Sub Area 1 ('Commercial') of the Camden Town Conservation Area.
- 2.31 The Camden Town Conservation Area Appraisal (2006) identifies buildings of note which are either positive or negative in their impacts on the character and appearance of the Conservation Area.
- 2.32 An extract of the Camden Town Conservation Area Appraisal (2006) is provided below, and shows that the Site is considered to be neither 'positive' nor 'negative'. It was concluded during pre-application consultations by Planning and Conservation Officers that the existing buildings make a neutral contribution towards the Conservation Area.



**Figure 3 - Extract of the Camden Town Conservation Area Appraisal (2006)**

## Land Use Designations

- 2.33 For the purposes of applying planning policy the following land use designations apply. The Site is:
- Within Camden Town Conservation Area;
  - On the 'edge' of Camden Town Centre;



- Outside of the Central London Area (and Central Activities Zone); and
- Outside of Camden's Growth Areas.

**Camden Policies Map extract**



**Figure 4 - Local Plan Policies Map Extract**

### 3 THE PROPOSED DEVELOPMENT

- 3.1 The proposed development seeks the demolition of the existing three buildings at 7ABC Bayham Street, and erection of a 5 storey building (+2 basement levels) comprising hotel and office uses with an ancillary café/bar and fitness suite.
- 3.2 Specifically, the proposed development comprises:
- Demolition of existing buildings on-site (530 sqm GIA of B1a office space);
  - Erection of a new building of 5 storeys, and 2 basement levels;
  - 691 sqm (GIA) of new co-working office floorspace (B1a Use Class);
  - 61 No. of hotel bedrooms (including 8 accessible rooms – 13%);
  - An ancillary café/bar at ground floor – open to both guests, office workers and the public;
  - Servicing from Bayham Street;
  - 16 No. cycle parking spaces for guests and staff at basement level 1; and
  - Zero car and coach parking (to be controlled through a Section 106 Agreement).

#### The Vision

- 3.3 The vision for the Site was to provide a high quality mixed-use redevelopment scheme comprising new flexible co-working office floorspace, hotel accommodation and an ancillary café/bar, within a new building which preserves and enhances the character and appearance of the Camden Town Conservation Area.
- 3.4 The intention (and commercial requirement) is for the office and hotel uses to have synergy, and for these to be operated as a single entity.
- 3.5 The vision included the occupiers of the co-working office space using the hotel accommodation, and likewise the guests of the hotel utilising the office space.
- 3.6 The café/bar would be ancillary to the office and hotel uses, and would be open to the public. The café/bar would also be used as the reception desk for both office and hotel uses as the focal point on the ground floor.
- 3.7 The design of the ground floor has been carefully considered to facilitate the office/hotel uses, with one entrance into the building, and a single reception desk that will co-ordinate both the office and hotel operations.
- 3.8 The applicant's vision seeks to create a high quality, mixed use development that would provide a flexible and multi-purpose facility to support the local creative industries/'TMT' sector and SME's within Camden, increasing employment density on the currently underutilised site.

## Co-working Office Floorspace

- 3.9 The proposed co-working office floorspace would result in a greater quantity and quality of B1a use floorspace than as currently provided on-site.

### **Quantity of existing and proposed office floorspace**

- 3.10 The existing quantum of office space on site is 530sqm (GIA); whilst the proposed quantum of office space is 691 sqm (GIA) (23.3% increase in space).
- 3.11 It has been calculated (using the HCA 2015 Employment Density Guide) that the proposed B1a floorspace could support approximately 53 FTE jobs. This represents an increase of 12 FTE jobs.
- 3.12 The office floorspace would comprise an element of affordable workspace in the form of discounted co-working desks. There will be a 50% discount on 20% of the co-working desks, secured through a Section 106 Agreement.

### **Quality of proposed floorspace**

- 3.13 The development proposal has been carefully designed to ensure the replacement and intensified office floorspace is of a high quality.
- 3.14 The proposed building would comprise a glazed courtyard on the ground floor level, along the northern side of the site. This glazed courtyard extends into the basement and would allow natural light to enter into both the ground floor and basement levels.
- 3.15 Additionally, lightwells have been included to the front and rear of the building to allow natural light to enter the basement levels.
- 3.16 The intake of natural light via the glazed courtyard, and lightwells would assure the proposed workspace would be a pleasant and naturally lit working environment.
- 3.17 The proposed office space would comprise a mix of works spaces, including a combination of flexible co-working areas, dedicated private working areas, informal work spaces and meeting rooms.
- 3.18 The proposed new co-working office space would be flexible space ideally suited for SMEs, TMTs, and the creative industries within Camden; and the mix of working spaces would cater for a mix of business types and sizes.



- 3.19 The proposed office space would be supplemented by an ancillary café/bar on the ground floor, and a fitness studio on the lower basement level, for its occupants to use. To note, the fitness suite will not be open to members of the public.

### Hotel

- 3.20 The proposed hotel would comprise 61 'design-led' hotel bedrooms.
- 3.21 9 of the hotel bedrooms (14%) would be accessible, which accords with London Plan policy requirements. These are to be located across the first, second, third and fourth floors of the building, in close proximity to the lift. As such, the accessible rooms are easily accessed.
- 3.22 The hotel accommodation would be supplemented by the ancillary café/bar, which would provide guests with a breakfast option and snacks/ 'light' options throughout the day.
- 3.23 Additionally, the fitness studio in the lower basement would also be for guests to use.
- 3.24 As set out within the accompanying Hotel Demand Study, prepared by Whitebridge Hospitality Ltd, the hotel (alongside ancillary café/bar) would generate 29 no. FTE jobs.

### Ancillary Café/bar

- 3.25 The ancillary café/bar would be located in the centre of the ground floor and would act as a focal point to the scheme; as it would be additionally used as the reception desk to both the office and hotel uses.
- 3.26 The café/bar would be open to the public.
- 3.27 As above, this would provide guests with a breakfast option and snacks/ 'light' options throughout the day.

### Ancillary fitness studio

- 3.28 The ancillary fitness studio would be located in the lower basement and would be accessible to all occupants of the office floorspace and all hotel guests.

### Height, scale and massing

- 3.29 The proposed building extends up to 5 storeys on Bayham Street, which reflects the immediate context of the Site. To take account of neighbouring amenity the building is terraced to the rear, graduating to 5no. floors above ground.

- 3.30 The proposed height, scale and mass has been fully informed by extensive consultation with Camden's Planning Officers and the Design Review Panel and is submitted with their support.

### Design and Materials

- 3.31 The final design achieves a 'warehouse' style design as is prevalent in the local context, but also seeks to reflect the verticality in the street scene and residential uses locally.
- 3.32 The primary material within the elevations is brick, which positively responds to the character and appearance of this part of Camden Town Conservation Area.

### Stakeholder Engagement

- 3.33 The development proposal described above has been fully informed and shaped by a comprehensive and constructive pre-application process, which has included 5 pre-application meetings with Camden's Planning Officers. The series of pre-application meetings were as follows:
- 13<sup>th</sup> December 2017: First Pre-application meeting with the Council;
  - 6<sup>th</sup> February 2018: Second pre-application meeting with the Council;
  - 24<sup>th</sup> April 2018: Third pre-application meeting with the Council;
  - 26<sup>th</sup> June 2018: Fourth pre-application meeting with the Council; and
  - 11<sup>th</sup> July 2018: Fifth pre-application meeting with the Council.
- 3.34 The proposed development has also been subject to the Council's external Design Review Panel on 16<sup>th</sup> March 2018 and 11<sup>th</sup> May 2018.
- 3.35 On 6<sup>th</sup> of June 2018 a public consultation event was held to engage with the local community and seek their feedback on the development proposals. Please refer to the submitted Statement of Community Involvement for full details on this consultation exercise.
- 3.36 The key matters raised during pre-application discussions are summarised in Table 1 below. A brief response is also set out in the Table below and the Design and Access Statement.

Matter	Feedback	Brief Response
<b>Office Use</b>	<p>The Council's Economic Development Officer (EDO) welcomed a re-provision and increase in employment floorspace on the site, through the delivery of co-working office floorspace (B1a use class).</p> <p>The EDO sought the proposed co-working space to be suitable for SMEs, and to include affordable workspace.</p> <p>The EDO requested information about the relocation of the existing tenants.</p>	<p>As the Site is currently in employment use, the starting point of the proposal in policy terms, is the re-provision and ideally the improvement of B1a floorspace. The proposed development achieves this, in accordance with Policy E2, by replacing the existing 530 sqm GIA with 691 sqm GIA of high quality, flexible proposed B1a floorspace.</p> <p>The flexible co-working space has been carefully designed to suit SMEs, TMTs, and the creative industries within Camden.</p> <p>The tenant relocation strategy is discussed in Section 5 below.</p>
<b>Hotel Use</b>	<p>Having regard to Policy H2, the Council sought justification to demonstrate how/why residential use within this scheme and on this site would not be appropriate.</p>	<p>Please refer to Section 5 of this Statement and Appendix 1 of the DAS which addresses this.</p>
<b>Height</b>	<p>The height of the building should be reduced.</p>	<p>The height of the scheme was reduced from 6 storeys down to 5 in accordance with the feedback received.</p> <p>The DRP members confirmed that a height of 5 storeys on this site was acceptable.</p>
<b>Scale and</b>	<p>Overall scale and mass of the building should be reduced to</p>	<p>The scale and massing of the building was reduced from the first to the second DRP</p>

<b>massing</b>	improve the relationship with the neighbouring buildings,	<p>meeting accordingly.</p> <p>The second DRP response confirmed that the panel considered the revised proposals to address issues raised and that the revised building was now of an acceptable volume of development for the site.</p> <p>Building has since been reduced further at the rear by stepping down from 5 to 3 Storeys.</p>
<b>Façade design</b>	<p>The façade should reflect a typical warehouse design.</p> <p>Detailing and materials should be used to ensure the elevation is not over-complicated, and works within the Conservation Area.</p>	<p>The façade was carefully designed to achieve a warehouse style.</p> <p>Detailing and materials were simplified and carefully selected to reflect the character and appearance of the conservation area.</p> <p>Officers are now supportive of the detailed design of the building.</p>
<b>Servicing</b>	<p>The Site should be serviced from Bayham Street.</p> <p>Sufficient storage for cycle should also be provided on site.</p>	<p>On-site servicing is not possible due to the physical constraints of the Site, and on street servicing on Bayham Street is therefore proposed.</p> <p>Cycle parking is provided on site at Basement level 1, accessed by a lift.</p> <p>The transport strategy for the development has been agreed with Camden Council's Principal Transport Planner.</p> <p>A Section 106 Agreement is proposed to include the restriction of coach parking/prevent coach party bookings at the hotel.</p>

## 4 PLANNING POLICY FRAMEWORK

4.1 This Section sets out the planning policy framework against which the proposed development should be assessed. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2 For the purpose of assessing the proposed development, the current Development Plan comprises:

- The London Plan (2016); and
- Camden Local Plan (2017).

### The London Plan (2016)

4.3 The key policies of the London Plan include:

- Policy 2.15 (Town Centres);
- Policy 4.2 (Offices);
- Policy 4.3 (Mixed Use Development and Offices);
- Policy 4.5 (London's Visitor Infrastructure);
- Policy 4.7 (Retail and town centre development);
- Policy 5.1 (Climate change mitigation);
- Policy 5.2 (Minimising carbon dioxide emissions);
- Policy 5.3 (Sustainable design and construction);
- Policy 5.6 (Decentralised energy in development proposals);
- Policy 5.7 (Renewable energy);
- Policy 5.9 (Overheating and cooling);
- Policy 5.10 (Urban greening);
- Policy 5.11 (Green roofs and development site environs);
- Policy 5.12 (Flood Risk Management);
- Policy 5.13 (Sustainable Drainage);
- Policy 5.14 (Water Quality and Wastewater Infrastructure);
- Policy 5.15 (Water Use and Supplies);
- Policy 5.16 (Waste Net Self-Sufficiency);
- Policy 5.21 (Contaminated Land);
- Policy 6.1 (Strategic Approach);
- Policy 6.9 (Cycling);
- Policy 6.13 (Parking);
- Policy 7.2 (An Inclusive Environment);
- Policy 7.4 (Local Character);
- Policy 7.6 (Architecture);
- Policy 7.8 (Heritage Assets and Archaeology);

- Policy 7.14 (Improving air quality); and
- Policy 7.15 (Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes).

### Camden Local Plan (2017)

4.4 The following Local Plan policies are relevant to consider in the determination of the development proposal:

- Policy E1 (Economic development);
- Policy E2 (Employment Premises and Sites);
- Policy E3 (Tourism);
- Policy H1 (Maximising housing supply);
- Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes);
- Policy H4 (Maximising the supply of affordable housing);
- Policy A1 (Managing the impact of development);
- Policy A2 (Open space);
- Policy A3 (Biodiversity);
- Policy A4 (Noise and vibration);
- Policy A5 (Basements);
- Policy CC1 (Climate change mitigation);
- Policy CC2 (Adapting to climate change);
- Policy CC3 (Water and flooding);
- Policy CC4 (Air quality);
- Policy CC5 (Waste);
- Policy C3 (Cultural and leisure facilities);
- Policy C5 (Safety and security);
- Policy C6 (Access for all);
- Policy D1 (Design);
- Policy D2 (Heritage);
- Policy TC1 (Quantity and location of retail development);
- Policy TC2 (Camden's centres and other shopping areas);
- Policy TC4 (Town centre uses);
- Policy T1 (Prioritising walking, cycling and public transport);
- Policy T2 (Parking and car-free development); and
- Policy T4 (Sustainable movement of goods and materials).

### Material Considerations

#### **The National Planning Policy Framework (2018)**

- 4.5 The National Planning Policy Framework (NPPF 2) (2018) provides the overarching planning guidance to which all Development Plan Documents must conform and as such, it is a material consideration of considerable weight.
- 4.6 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). For making planning decisions that means approving development proposals that accord with the Development Plan without delay.
- 4.7 The NPPF provides guidance on all of the other key planning considerations for the purposes of this application as set out in the following Section, including heritage, design, transportation, town centre uses etc.
- 4.8 Other material considerations include the following Camden Planning Guidance:
- CPG 1 Design (2015);
  - CPG 2 Housing (updated 2018);
  - CPG 5 Town Centres, Retail & Employment;
  - CPG 7 Transport (2011);
  - CPG 8 Planning Obligations (2015 updated March 2018); and
  - CPG Employment sites and business premises (2018).
- 4.9 The key guidance within these documents will be discussed in more detail in Section 5 of this Planning Statement in the context of the proposed development.

### Emerging Planning Policy & Guidance

- 4.10 The New Draft London Plan has not yet been through examination, and is likely to undergo examination in early 2019. Therefore, whilst the document forms a material consideration, it is of limited weight in decision making.

## 5 PLANNING ASSESSMENT

5.1 This Section assesses the proposed scheme against the development plan and identifies other material considerations of weight where appropriate. Through pre-application discussions and as made clear by planning policy and guidance, the key matters to consider are as follows:

- Principle of redevelopment;
- Principle of the proposed development;
- Design and Heritage;
- Highways and Transport;
- Amenity;
- Sustainability and Energy;
- Air Quality;
- Waste Storage and Collection;
- Ecology;
- Flood risk; and
- Contamination.

### Principle of Redevelopment

5.2 The proposal seeks to make a more efficient and effective use of an under-utilised, previously developed site, in a highly sustainable and accessible location, on the edge of Camden Town Centre.

5.2 This principle of development is therefore wholly in accordance with the planning objectives of Paragraphs 11, and 117 of the NPPF, Policy G1 of the Camden Local Plan (2017) and Policy 7.6 of the London Plan.

### Principle of the Proposed Development

#### Office Use

5.3 Paragraph 80 of the NPPF affords significant weight to the need to support economic growth and productivity.

5.4 London Plan Policy 4.2 (Offices) supports “*the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises*”.

5.5 This policy also supports: “*focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment*.”



- 5.6 London Plan Policy 4.3 (Mixed Use Development and Offices) confirms that outside of the Central Activities Zone: *“mixed use development and redevelopment should support consolidation and enhancements to the quality of the remaining office stock.”*
- 5.7 The proposed development is compliant with these London Plan policies as it provides a mix of commercial and employment generating uses, is in a viable location with good public transport access, and would achieve an enhancement to the quality of existing office stock with a facility ideally suited for small and medium sized enterprises.
- 5.8 Policy E1 (Economic development) of the Local Plan confirms that the Council will:
- a. *support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
  - b. *maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
  - c. *support local enterprise development, employment and training schemes for Camden residents;*
  - d. *encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
  - f. *direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
  - g. *support Camden’s industries by:*
    - ii. *supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;*
  - i. *recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.”*
- 5.9 The development proposal fully accords with Policy E1 as the proposed co-working space would be an intensification and improvement of the existing office space, would suit SME’s and businesses of different sizes (including creative and cultural businesses), is in an accessible edge of Town Centre location, and includes another employment generating use in the form of a hotel (‘tourism’).
- 5.10 Policy E2 (Employment premises and sites) states:
- “The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy...*
- We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:*
- c. *the level of employment floorspace is increased or at least maintained;*
  - f. *the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;*

- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;*
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and*
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.”*

- 5.11 The proposed development is compliant with Policy E2 as it seeks to replace 530 sqm (GIA) of low grade and low density B1a office space with 691 sqm (GIA) of high quality flexible co-working space, which would be suitable for start-ups, and SME's; whilst also including an element of affordable workspace. The proposed co-working space would create employment opportunities for local residents in its own right, as would the hotel use, and further through the construction phase.
- 5.12 As outlined in Section 6, the applicant agrees to a Section 106 Agreement which secures opportunities for apprenticeships and training for local residents, in accordance with CPG 8 “Planning Obligations”.
- 5.13 In terms of providing other priority uses such as housing, we deal with this in detail below; however, it is concluded that in this instance, such provision is not required and therefore Policy E2 is complied with in full.
- 5.14 It was confirmed by Camden Council during pre-application discussions that the principle of office use within this scheme is acceptable and that it is not appropriate for the development to also comprise housing.

#### Tenant Relocation Statement

- 5.15 The site currently accommodates 3 tenants: Fulwell 73 Limited, Casna Limited and JFH Law LLP.
- 5.16 Fulwell 73 Limited (a film and TV production company set up in 2005) has been looking to relocate for some time, due to the expansion of their business. Indeed, they have outgrown their premises and the space they require is considerably more than what is being proposed under this application.
- 5.17 To assist in their relocation, the applicant has offered to directly assist Fulwell 73 with their search for a new premises.
- 5.18 The applicant has identified a range of available premises within the Borough which may meet Fulwell's needs. This is provided at Appendix A.
- 5.19 Casna Limited is a high-end cleaning company, set up in 1989. Whilst there is sufficient space to accommodate Casna within the new scheme, it is understood that they seek a self-contained building, and as such, they will be seeking alternative accommodation off-site.

- 5.20 The business fully intends to remain in the area. The applicant has offered to assist Casna with their search for new premises. See Appendix A.
- 5.21 JFH Law LLP is a small firm formed of 2 partners and 3 solicitors. The company is yet to decide whether they would like to remain on-site; however, from initial feedback, we understand that the flexible work space may not be best suited for JFH.
- 5.22 If JFH are to relocate, we understand that their preference is to remain in Camden as their client base is predominately local. The applicant has offered directly assist JFH with their search for a new premises. See Appendix A.

### Affordable Workspace

- 5.23 In accordance with Policy E2, affordable workspace will be provided on-site. The intention is to provide 20% of desks at a 50% discount rate.
- 5.24 We welcome further discussions with the Council to confirm the precise detail of this, and can confirm that affordable workspace provision will be secured through the Section 106 Agreement.

### Hotel Use

- 5.25 London Plan Policy 4.5 (London's Visitor Infrastructure) states that *"the Mayor will, and boroughs and relevant stakeholders should seek to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent should be wheelchair accessible"*.
- 5.26 This policy seeks to direct new visitor accommodation (hotels) to the Central Activities Zone (CAZ) in the first instance, and thereafter, to Town Centres and opportunity/intensification areas and those areas with good public transport access:
- 5.27 Notably more recent evidence base studies (supporting the New London Plan 2017) have indicated that the projected demand of net additional bedrooms is now increased to 58,140 serviced accommodation rooms by 2041 from the 2015 stock levels. This updated figure leads to an additional 400 rooms per year required across London, and specifically in the Borough of Camden, an increase of 1,760 (2.7% of London supply).
- 5.28 The proposed hotel accommodation would be located at the edge of Camden Town Centre in a highly accessible area with a PTAL rating of 6B. Pre-application discussions confirm this as a suitable location for a hotel of the scale provided (61 rooms).
- 5.29 To note, more than 13% of hotel accommodation will be wheelchair accessible rooms (8 of 61 bedrooms).

5.30 Having regard to the above, it considered that the proposed development accords with the objectives of London Plan Policy 4.5.

5.31 Local Plan Policy E3 (Tourism) confirms the LPA will:

*“...b. allow smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage;*

*c. consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough;*

*d. encourage large-scale tourism development and visitor accommodation to provide training and employ Camden residents;*

*e. protect existing visitor accommodation in appropriate locations.*

*All tourism development and visitor accommodation must:*

*f. be easily reached by public transport;*

*g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;*

*h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and*

*i. not lead to the loss of permanent residential accommodation.”*

5.32 Camden Local Plan Policy E3 seeks to direct smaller scale hotels to the town centres, in this instance Camden. It also permits hotels of a specialist focus to be permitted beyond the town centres.

5.33 The proposed development only provides 61 rooms, and the floorspace associated only with the hotel is just 1,109 sqm GIA. In this respect, the proposed hotel is considered to be small scale. Furthermore, the concept of the hotel is that it is run in synergy with the co-working space and intended to serve the local Camden business and tourist market. It is to run as an independent hotel and is to be unique and ‘design-led’; in this respect the hotel is considered to be ‘specialist’.

5.34 Given this, and as the Site is located at the edge of Camden Town Centre and within a highly accessible area (with a PTAL rating of 6b), it is considered that the location is entirely appropriate for hotel accommodation, and thus the scheme complies with the objectives of Local Plan Policy E3.

5.35 The hotel use has been confirmed as acceptable in principle with the Council through pre-application discussions.

### **Ancillary Uses**

- 5.36 The proposed development includes an ancillary café/bar and fitness suite.
- 5.37 The proposed café/bar is integral to the operation of the building as a whole, and is a use commonly associated with co-working, hotel and office spaces. The café/bar will be used by both users of hotel and office space, as well as members of the public.
- 5.38 The proposed fitness suite will operate ancillary to the hotel and office space, and will be used by hotel and office users only (not members of the public). Fitness suites are commonly associated with both office and hotel developments, and therefore its inclusion within this scheme should be considered acceptable in principle.

### Application of Policy H2

- 5.39 Local Plan Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) encourages the inclusion of self-contained homes in non-residential development in all parts of the borough. In the Central London Area and town Centres of Camden Town, Finchley Road/Swiss Cottage and Kilburn High Road (i.e. 'the specified areas'), this policy is more prescriptive and states that where development involves additional floorspace of more than 200 sqm (GIA), the Council will require 50% of all additional floorspace to be self-contained housing.
- 5.40 The Site is not located in the Town Centre of Camden (or in any of the other 'specified areas') and as such, it is our view that there is no specific requirement for residential floorspace to be provided as part of the development proposal.
- 5.41 Paragraph 2.7 of the Local Plan makes clear that it is not only homes that are important but other uses, particularly those which generate employment and training opportunities for residents, and where this can support important tourist/employment hubs such as Camden.
- 5.42 Nonetheless, we have reviewed the various criteria within Policy H2 and below provide an assessment demonstrating why the introduction of a residential use to the proposed development is not appropriate, practical or commercially viable:

#### ***a. the character of the development, the site and the area;***

- 5.43 The character of the development is commercial. The proposed development includes the re-provision and enhancement of office space, and a hotel that will operate in close managerial alignment with the office space. The office and hotel uses would be operated as one entity and should not be considered separately. Both uses are commercial and are inherently compatible and complementary to one another. Additionally an ancillary ground floor café/bar is to be provided to support the office and hotel function. Indeed it is integral to the success of both uses. The

introduction of residential use would be incompatible with commercial uses in terms of amenity impacts, but also having regard to the physical constraints of the Site limiting the ability to successfully provide 3 main uses.

- 5.44 The current character of the Site is commercial. The proposed development replaces/improves the existing commercial use in accordance with Policies E1 and E2. The Site has historically been in commercial use and in our view it would not be appropriate to deliver a residential use on-site.
- 5.45 The character of the area is mixed but considered predominantly commercial, as confirmed by the Conservation Area Appraisal "Sub Area 1 ('Commercial')".
- 5.46 The proposed development, with its mix of commercial uses, would complement and be compatible with the other local commercial facilities.

***b. site size, and any constraints on developing the site for a mix of uses;***

- 5.47 The Site is contained on three sides, with access only being achievable from Bayham Street. The Site is therefore constrained.
- 5.48 With due consideration to the surrounding built context, the height of the development is contained to a maximum of 5 storeys, with a number of terraces to the rear to account for neighbouring amenity.
- 5.49 Policy requires the re-provision of at least 530 sqm (GIA) of B1a floor space in the first instance. The business model then requires an office building of sufficient scale to be commercially viable. Further, the business model is to co-locate and jointly operate the co-working space with a design-led hotel serving a specialist local function, including an integral café/bar.
- 5.50 The hotel use requires sufficient space for back of house uses such as kitchens, storage, staff welfare facilities, office and servicing etc. It also needs a critical mass of rooms to be commercially viable.
- 5.51 Given the height and footprint of the development have been established through pre-application discussions (indeed trimmed to the minimum possible), ensuring the delivery of the proposed development without residential is already extremely challenging.
- 5.52 To deliver housing as part of the development would require the installation of at least one separate access and core, separate cycle storage, separate refuse and recycling storage, and separate means of power.

5.53 The submitted Design and Access Statement includes diagrams which show in detail that it is not feasible to introduce the residential use and meet the relevant Design Standards. Furthermore, the diagrams demonstrate that the space requirements for residential use would also make the office/hotel elements of the development commercially unviable.

5.54 In essence, the introduction of a residential use to the proposed development would deliver three compromised uses, none of which would meet planning policy or commercial requirements. Therefore, it is considered that it is not be appropriate to provide a residential use within the mix of uses within the development proposal.

***c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;***

5.55 This is not relevant.

***d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and***

5.56 As outlined above, the physical constraints of the Site means that there would be a conflict between the hotel, office and residential accommodation. Combining both residential and hotel/office uses in a single building on a relatively small plot will inevitably lead to operational difficulties and impacts upon amenity.

5.57 The impacts would be mutual with, for example, guest/residents making noise within the building. If a guest makes noise, it is within the operator's control to manage the guest. If the noise issue arises from a residential unit and disturbs a guest, there is limited action the operator can take. A large part of a hotel's success is how comfortable their guests' stay is, and thus noise disturbance is a key issue in this regard.

5.58 The hotel must manage security, fire, health and safety risks, and sharing the building with a residential use that is not in the hotel's control would not be acceptable to operators, in this instance.

5.59 It is acknowledged that on larger sites hotels/and residential uses share buildings, but this only occurs where the scale of the building enables a sufficient degree of separation between the uses and their independent control and management. This does not apply to the proposed development.

***e. whether the development is publicly funded or serves a public purpose.***

5.60 The development is not publicly funded.

***f. the need to add to community safety by providing an active street frontage and natural surveillance;***

- 5.61 The southern, western and northern boundaries of the Site are bounded by existing development or third party land, which dictates that all activity and will naturally be directed to Bayham Street.
- 5.62 As already described, there is not sufficient space to add an additional access at the front of the building, and no opportunity to provide an access elsewhere.

***g. the extent of any additional floorspace needed for an existing user;***

- 5.63 The proposal seeks to provide a net gain of approximately 161sqm GIA of office floorspace in accordance with Policy E2. The introduction of this space allows the creation of a critical mass of co-working space. As described, the applicant's business model is to operate the office and hotel function in close managerial alignment, with both elements working together. Through pre-application discussions, the scale of the development has reduced to its minimum viable amount. It is not practical or feasible to allow any of the space to be set aside for housing.

***h. the impact of a mix of uses on the efficiency and overall quantum of development;***

- 5.64 If the proposal was to include an additional residential use, this would require a separate entrance, and separate cores within the scheme, along with separate space for items such as cycle parking and waste stores. The resultant impact on the internal configuration of the scheme would be wholly inefficient and would harm the development's commercial viability and deliverability.
- 5.65 Please refer to the text provided against criterion 'd', which is also relevant to this criterion.

***i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and***

- 5.66 The scheme includes an intensification of office floorspace as a first principle. The development proposal would also deliver a design-led hotel and ancillary uses. To achieve this on a constrained site, 2no. basement levels are required.
- 5.67 A Viability Assessment is provided with the application to provide further detail on this point.

***j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.***



- 5.68 This is a commercial site in a mixed commercial area. There is a strategic need for more hotel accommodation within London and Camden, and better quality hotel accommodation in general. The mix of office and hotel uses would complement Camden Town Centre greatly, and would enhance the commercial offering of the immediate area. The proposed development complies with the Development Plan and generates a number of benefits such as jobs growth and opportunities for training that the Local Plan seeks to achieve.

## Design and Heritage

### Height, scale and mass

- 5.69 London Plan Policy 7.4 (Local Character) requires new buildings to have regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass.
- 5.70 Policy 7.6 (Architecture) requires new buildings and structures to be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.
- 5.71 Policy D1 (Design) of the Local Plan seeks new development to respect local character and context.
- 5.72 The proposed height and massing has been carefully considered to ensure the new building respects the local built context. The proposed building comprises 5 storeys, and to the rear the building is stepped down to align with the scale and height of development and Kings Terrace. The building respects the building line to the front and rear of the Site.
- 5.73 To the south, west, and east are buildings of 6 storeys, whilst to the north the buildings are typically 3-4 storeys. In this context, it is considered that the proposed height fully respects the local character in terms of height and scale.
- 5.74 In terms of massing, the building is sited close to its boundaries but does not fill the entirety of the plot. Lightwells are provided to the north and west of the building, setting it in from the boundary. As above, at upper levels, the massing is carefully modelled to step down to the lower scale Kings Terrace.
- 5.75 Both DRP and the Planning and Design Officers have confirmed the height, scale and massing to be acceptable. For these reasons, it is considered the proposed height, scale and massing comply with London Plan Policies 7.4 and 7.6 and Policy D1 of the Local Plan.

## Design and appearance

- 5.76 London Plan Policy 7.4 (Local Character) confirms development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
- 5.77 Policy 7.6 (Architecture) requires buildings to be of the highest architectural quality; to comprise details and materials that complement, not necessarily replicate, the local architectural character.
- 5.78 Policy D1 (Design) of the Local Plan seeks to secure high quality design in development, which comprises details and materials that are of high quality and complement the local character; and are sustainable in design and construction.
- 5.79 Section 12 of the NPPF stresses the important role of high quality design in the pursuit of delivering sustainable development.
- 5.80 The proposals for 7abc Bayham Street have not been designed in isolation, but rather a considered response to the local character of the Camden Town Conservation Area. As part of an iterative process, working closely with various specialist consultants as well as the local authority, the design team have developed a highly contextual design response which will serve to complement the immediate streetscape whilst enhancing the provision of public amenity along Bayham Street.
- 5.81 The vision for 7abc Bayham Street is to rise to the challenge of transforming a currently under-utilised urban site to deliver contemporary architecture which has a strong identity and creates a unique sense of place in the form of a new hotel and office concept which will serve as a catalyst towards the ongoing regeneration of the local area.
- 5.82 The proposed architectural response for this exciting new concept will bring cohesion in the existing urban form by establishing order the dissolved terrace block whilst bringing diversity of colour and materiality which will serve to compliment the eclectic typology of Bayham Street. The proposals have been developed to recognise the existing constraints of the local area and have been designed with long term sustainability as a core principle, ensuring the building is adaptable to a changing social and economic environment and will be appropriate for the future within a constantly evolving townscape.
- 5.83 The design aims to respect existing architectural relationships and draw on them to inspire and guide the development as a new urban form. By consolidating the existing urban block the architecture aims to achieve continuity and integration with a priority given to the design of public space. The internal public spaces provided at ground level centre around the building's entrance,

forming a relationship with the public realm encouraging a sense of safety along Bayham Street and an enhanced community atmosphere.

- 5.84 The buildings, street interface, landscape and internal public spaces are designed to be built to high standards, aesthetically and structurally, with durable materials, appropriate technology and orientation that minimises energy use and encourages sustainability.
- 5.85 Drawing on the historical light industrial usage of the site, brick has been selected as the primary façade material due to its historic use within the area, its durability and reinforcing quality that supports the character of the conservation area. A variety of texture and pattern is expressed in careful use of detail to provide a highly contemporary response with a traditional palate of materials. Though the building form will follow the orderly Georgian typology and line of the neighbouring buildings, this will be set against a strong vertical element over a double height entrance, defining the aspirations of the scheme to become a landmark hotel and office concept.
- 5.86 This will be defined with the use of bronze metal type cladding material used to define this element whilst a slim-line structure and natural colour tones will ensure the contemporary response remains contextual and lightweight in appearance as appropriate response to the street scene. The light industrial quality will be further referenced through the use of crittall type windows, with slim frames referencing the materiality of the entrance projection.
- 5.87 Following the guidance outlined in the Camden Town Conservation Area Appraisal and Management Strategy, the proposal aims to balance the harmony of the proposed architectural character with notable, existing architecture while providing appropriate levels of variety and interest to denote a contemporary, urban insertion.
- 5.88 The proposed development therefore accords with the relevant design policies of outlined above, as the well-informed design would enhance the character of the local area with its carefully considered appearance and material palette.

### Basement Design

- 5.89 The proposed development includes the provision of a two storey basement to include workspace, the fitness suite and other back of house functions.
- 5.90 Policy A5 (Basements) of the Local Plan requires basement development to not cause unacceptable harm to neighbouring properties; the structural, ground, or water conditions of the area; or the character and amenity of the area.

- 5.91 This application has been supported by a Basement Impact Assessment and Construction and Environmental Management Plan which demonstrates that the proposed development is compliant with the guidance of Policy A5.

## Heritage

### **Above Ground Built Heritage**

- 5.92 The aim of Section 16 of the revised NPPF is to conserve and enhance the historic environment i.e. not cause harm to it.
- 5.93 Paragraph 196 confirms LPA's should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 5.94 London Plan Policy 7.8 (Heritage Assets and Archaeology) sets out that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.95 Policy D2 (Heritage) of the Local Plan states that the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. As such, any development will need to respect local character and context, preserve or enhance the historic environment, be sustainable, utilise high quality detail and materials, integrate with the surrounding streets and spaces, be inclusive, promote health, be secure, respond to natural features, incorporate landscaping and amenity space, preserve local and strategic views and carefully integrate building services equipment.
- 5.96 Existing buildings on-site have been recognised as having a neutral contribution to the character of the Conservation Area, and respectively the existing buildings are of negligible heritage value. Their redevelopment is therefore justified.
- 5.97 In terms of the proposed development, this is supported by a Heritage Statement, prepared by Heritage Collective, which concludes that the proposed works would preserve, if not enhance, the character and appearance of Camden Town Conservation Area. The Statement explains that the proposed development, which has been carefully considered following advice from LBC, is of a high quality design that responds to the streetscene along Bayham Street and is a suitable addition to the Conservation Area.

- 5.98 In consideration of the above, the development proposal is considered to comply with Policies 7.8 and D2 with regards to above ground heritage assets.
- 5.99 In accordance with Paragraph 196 of the NPPF, it is considered that the proposed works would preserve the character and appearance of Camden Town Conservation Area.
- 5.100 In light of the balancing exercise discussed in Paragraph 196 of the NPPF, the proposed development will not substantially harm the Conservation Area, and that the proposed works will optimise the use of the site.
- 5.101 It is important to note that the design of the building has been carefully considered following advice from LB Camden, and the Design Team has responded to these comments by reducing the bulk, scale, mass and height of the proposed new building. The new building will preserve the character and appearance of the conservation area using high quality design and materials which responds to both the emerging and existing street scene along Bayham Street.
- 5.102 Please refer to the Heritage Statement for further information.

#### **Below Ground Heritage**

- 5.103 London Plan Policy 7.8 (Heritage Assets and Archaeology) explains that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site.
- 5.104 Policy D2 (Heritage) of the Local Plan explains that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 5.105 The development proposal is supported by an Archaeological Desk-Based Assessment, prepared by Archaeology Collective. This report explains that the Site is not located within an Archaeological Priority Area, and as such, concludes that there is a low to negligible potential for archaeological remains on site. The Assessment demonstrates that the proposed development complies with Policies 7.8 and D2 with regards to below-ground heritage assets. Please refer to the Archaeology Desk-Based Assessment for further information.

#### **Highways and transport**

- 5.106 The Site has a PTAL rating of 6b. This represents the highest level of accessibility.

- 5.107 The scheme is to be 'car-free' and thus promotes the objectives of the NPPF and Development Plan in encouraging sustainable modes of transport and discouraging reliance on the motor car.
- 5.108 As described below, servicing is to be from a dedicated on-street location.
- 5.109 Paragraph 109 of the NPPF confirms that development proposals should only be refused on transport grounds if the cumulative impact of the proposal is 'severe'. Pre-application discussions have confirmed our approach to parking and servicing to be acceptable, and therefore in accordance with the NPPF and the Development Plan. We expand further below.

### Servicing

- 5.110 Policy T4 (Sustainable movement of goods and materials) confirms that developments of over 2,500 sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.
- 5.111 Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours. The factors the Council will consider include the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.
- 5.112 In accordance with both Policy T4 and A1, the application is submitted with a Transport Assessment, a draft Travel Plan, draft Servicing and Deliveries Plan and Construction Management Plan. Collectively these documents demonstrate that both during construction and in operation, the development will operate successfully and without harm to the highways network.
- 5.113 London Plan Policy 6.13 (Parking) requires all developments in London to provide for the needs of businesses for delivery and servicing.
- 5.114 Policy TC4 (Town centre uses) confirms the Council will consider parking, stopping and servicing and the effect of the development on ease of movement on the footpath.
- 5.115 It has been agreed with the Council that an on-street loading bay will be placed on Bayham Street for servicing and deliveries, and waste collection. As such, the development proposal would be adequately serviced from Bayham Street, in accordance with the relevant policies of the Development Plan.
- 5.116 The Council's Highway Officer has confirmed acceptance to the proposed servicing strategy.

## Cycle Parking

- 5.117 London Plan Policy 6.1 (Strategic Approach) seeks to improve the capacity and accessibility of public transport, walking and cycling.
- 5.118 Policy 6.9 (Cycling) seeks to achieve a significant increase in cycling in London. Developments are expected to provide secure, integrated, convenient and accessible cycle parking facilities in line with minimum standards.
- 5.119 Policy 6.13 (Parking) requires development in all parts of London to meet the minimum cycle parking standards.
- 5.120 Policy T1 (Prioritising walking, cycling and public transport) of the Local Plan seeks development to provide for and make contributions towards connected, convenient and safe cycle routes; and provide for accessible secure cycle parking facilities exceeding minimum cycle parking standards.
- 5.121 The minimum standards for cycle parking are outlined in Table 6.3 of the London Plan:

Land Use	Long-stay	Short-stay
<b>Office (B1a Use Class)</b>	inner/ central London: 1 space per 90 sqm	first 5,000 sqm: 1 space per 500 sqm
<b>Hotel (C1 Use Class)</b>	1 space per 20 bedrooms	1 space per 50 bedrooms

**Table 2 - Minimum Cycle Parking Standards (Table 6.3 of the London Plan)**

- 5.122 The proposed scheme includes the provision of 16 cycle spaces (which exceeds the policy requirement), within a secure, integrated, convenient and accessible parking facility, and thus complies with this policy guidance.
- 5.123 On this basis, the proposed cycle parking facility complies with the relevant policies of the Development Plan.

## Car Parking

- 5.124 London Plan Policy 6.1 (Strategic approach) confirms the Mayor will encourage patterns and nodes of development that reduce the need to travel by car.
- 5.125 Policy 6.13 (Parking) confirms that in areas of high accessibility, developments should be car-free.

- 5.126 Policy T2 (Parking and car-free development) of the Local Plan requires all new developments in the borough to be car-free.
- 5.127 The proposed development is to be car-free, and therefore wholly complies with Policies 6.1, 6.13 and T2 of the Development Plan.

### Amenity

#### Daylight and sunlight

- 5.128 London Plan Policy 7.6 (Architecture) explains that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy and overshadowing.
- 5.129 Policy A1 (Managing the impact of development) states that the Council will seek to protect the quality of life of occupiers and neighbours. As such, the Council will not grant planning permission where a proposal would lead to an unacceptable harm to amenity, and will resist development that has a negative impact upon sunlight, daylight and overshadowing.
- 5.130 CPG Amenity (2018) expects developments to be designed to protect the privacy of occupiers of both existing and proposed dwellings. In addition, applicants will be expected to introduce mitigation measures to reduce overlooking.
- 5.131 To deal with the matter of daylight and sunlight impacts, Point 2 Surveyors have prepared the relevant Assessment.
- 5.132 Within the Daylight and Sunlight Assessment Point 2 Surveyors make clear that the BRE handbook 'Site layout planning for daylight and sunlight: a guide to good practice (BR209)' acknowledges that for an urban context, its *"numerical guidelines should be interpreted flexibly since natural light is only one of many factors in site layout design and amenity provision"*.
- 5.133 As such, an appropriate level of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets.
- 5.134 The siting, scale, height and massing of proposed scheme has been carefully designed to seek to minimise impact on sunlight, daylight and overshadowing of neighbouring properties, whilst seeking to make an efficient use of the site, and achieving a viable quantum of development.
- 5.135 The Assessment should be read in full but briefly, it concludes:



*“The results of the detailed technical assessments highlight that the majority of the neighbouring buildings will be BRE compliant in respect to daylight and sunlight amenity. Where there are changes which fall short of the BRE criteria, these are a product of the proximity and location of sensitive windows that overlook the development site.*

*The overshadowing results show that the proposed development will have a negligible effect on neighbouring amenity areas. Whilst there will be a minor reduction to one amenity area on 21st March, an additional assessment on 21st June has been undertaken which demonstrates that there will be an improvement in sunlight availability at certain times of the year.”*

- 5.136 Therefore, it is considered the proposed development does not cause an unacceptable impact by way of daylight and sunlight or overshadowing, and thus accords with London Plan Policy 7.6, and Policy A1 of the Local Plan.

#### Privacy and Overlooking

- 5.137 Local Plan Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours. As such, the Council will grant planning permission for development unless it causes unacceptable harm to amenity, visual privacy and outlook.
- 5.138 The proposed development has been designed in order to avoid overlooking surrounding residential properties. Specifically, there are a number of windowless rooms on the eastern and western elevation. It is important to note that there are no planning policies to restrict against the provision of windowless hotel rooms, and that the type of accommodation is considered acceptable in line with relevant amenity policies.
- 5.139 Massing has also been reduced to the rear to maximise the distance from proposed bedrooms (with windows) and neighbouring properties.
- 5.140 It should be considered that hotel rooms are designed and used as bedrooms. They are typically occupied at night (for the purpose of sleeping) and guests of course require privacy themselves. Bedrooms are fitted with curtains/blinds and given the direct facing separation distances (minimum 9m/ maximum 21m) and the requirement for mutual privacy, overlooking and loss of privacy is not considered to be an issue.

#### Noise

- 5.141 London Plan Policy 7.15 (Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes) confirms that development proposals should seek to manage noise by avoiding significant adverse noise impacts and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity

of new development. In accordance with Policy 7.15 development proposals should improve and enhance the acoustic environment and seek to separate noise sensitive development from major noise sources.

- 5.142 Local Plan Policy A4 (Noise and vibration) explains that the Council will seek to ensure that noise and vibration is controlled and managed. Planning permission will not be granted for development that is likely to generate unacceptable noise and vibration impacts or development sensitive to noise in locations which experience high levels of noise (unless appropriate attenuation measures can be provided which will not harm the continued operation of existing uses).
- 5.143 The Council will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. Furthermore, the Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 5.144 The submitted Acoustic Report, prepared by Sandy Brown, provides further detail as to noise and vibration levels. The Report assesses the acoustic performance of the façade and provides guidance on the future ventilation strategy.
- 5.145 The Report concludes that tactile vibration, structure borne noise and ground-borne noise will not adversely impact the site or its surroundings. The Report also reiterates that all plant items, to be placed on the roof, will be designed to adhere to policy compliant noise limits, and to minimise nuisance to neighbouring properties. As such, and in consideration of the above, the proposed development accords with relevant noise and vibration policies included within the Development Plan.

### Sustainability and Energy

- 5.146 London Plan Policy 5.1 (Climate Change Mitigation) states that the Mayor seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. In support of this, Policy 5.2 (Minimising Carbon Dioxide Emissions) explains that development proposals should make the fullest contribution to minimising carbon dioxide emissions.
- 5.147 Policy 5.2 (Minimising carbon dioxide emissions) further states that major development proposals should include a detailed Energy Assessment to demonstrate how the targets for carbon dioxide emissions reduction.
- 5.148 Policy 5.3 (Sustainable Design and Construction) sets out that development proposals should demonstrate that sustainable design standards are integral to the proposal, including its

construction and operation, and ensure that they are considered at the beginning of the design process.

- 5.149 Policy 5.6 (Decentralised Energy in Development Proposals) explains that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems.
- 5.150 Policy 5.7 (Renewable Energy) highlights that development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 5.151 Policy 5.9 (Overheating and Cooling) states that major development proposals should reduce potential overheating and reliance on air conditioning systems.
- 5.152 Policies 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) seek development proposals to contribute to urban greening, including tree planting, green roofs and walls, and soft landscaping.
- 5.153 Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards.
- 5.154 Policy CC2 (Adapting to climate change) states that the Council requires development to be resilient to climate change. As such, development should adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 5.155 Policy CC2 expects non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 5.156 The proposed development complies with the aforementioned guidance in the development plan, as the scheme includes a range of sustainable design and construction features are proposed including:
- Incorporation of Combined Heat and Power (CHP) and Air Source Heat Pumps (ASHPs) (to reduce carbon emissions by 35% relative to Part L 2013 – i.e. the development will be low carbon);
  - Water saving sanitary fittings and appliances to deliver a water efficient development;
  - The use of materials with a low lifecycle environmental impact and embodied energy; and
  - Efficient construction and operational waste management.

- 5.157 It is proposed to assess the scheme against BREEAM with a target rating of “Excellent” for both the hotel and offices.
- 5.158 The approach follows the Energy Hierarchy, with priority given to efficient design on the basis that it is preferable to reduce carbon emissions by reducing energy demand than through the use of low and/or zero carbon technologies.
- 5.159 The building’s fabric shall be constructed to a high performance standard, achieving high levels of thermal insulation and low air permeability. Energy efficient lighting and appropriate controls shall be employed throughout the development.
- 5.160 In accordance with Policies 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs), the proposed development comprises planted areas on the fourth and fifth floor totalling 235 sqm and a green roof of 240 sqm. Combined, these areas will result in a net gain in habitat of an ecological value of 475 sqm. Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.
- 5.161 Please refer to the submitted Sustainability Statement and Energy Statement for further information.

#### Air Quality

- 5.162 London Plan Policy 7.14 (Improving air quality) requires development proposals to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans. Development should also promote sustainable design and construction to reduce emissions from the demolition and construction of buildings.
- 5.163 Policy 7.14 further states that developments should be *at least* ‘air quality neutral’ and not lead to further deterioration of existing poor air quality.
- 5.164 Local Plan Policy CC4 (Air quality) explains that the Council will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough.
- 5.165 Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

- 5.166 This application is supported by an Air Quality Assessment prepared by Royal Haskoning DHV. This report concludes that the proposed development is unlikely to have an impact upon air quality in the local area, and as such, can be considered “air quality neutral”. Therefore, the proposed development is in accordance with London Plan Policy 7.14
- 5.167 In compliance with London Plan Policy 7.14 and Local Plan Policy CC4, a series of mitigation measures are included within the Air Quality Assessment, to ensure that construction dust impacts are insignificant.
- 5.168 For more information, please refer to the accompanying Air Quality Assessment.

### Waste Storage and Collection

- 5.169 London Plan Policy 5.16 (Waste Net Self-Sufficiency) sets out the Mayor’s commitment to:
- minimising waste;
  - encouraging the reuse of an reduction in the use of materials;
  - exceeding recycling/composting levels in local authority collected waste (LACW) of 45 per cent by 2015, 50 per cent by 2020 and aspiring to achieve 60 per cent by 2031;
  - exceeding recycling/composting levels in commercial and industrial waste of 70 per cent by 2020;
  - exceeding recycling and reuse levels in construction, excavation and demolition (CE&D) waste of 95 per cent by 2020;
  - improving London’s net self-sufficiency through reducing the proportion of waste exported from the capital over time; and
  - working with neighbouring regional and district authorities to coordinate strategic waste management across the greater south east of England.
- 5.170 Local Plan Policy CC5 (Waste) states that the Council will seek to make Camden a low waste borough, by:
- Aiming to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets; and
  - Making sure that developments include facilities for the storage and collection of waste and recycling.
- 5.171 This application is supported by a Site Waste Management Plan (SWMP). The Plan details that, in accordance with London Plan Policy 5.16 and Local Plan Policy CC5, over 94% of the total mass of waste arising from development is predicted to be diverted from landfill and either recycled or recovered over the construction phase.
- 5.172 This application is also supported by a Waste Assessment Report, which details how any waste produced during operation will be managed effectively and responsibly. In compliance with the above policies, receptacles will be provided for dry recyclables, such as paper & cardboard, plastic,

glass, wood and metal to facilitate the most appropriate reuse, recycling or recovery option in accordance with the waste hierarchy.

- 5.173 For more information regarding how waste will be managed during construction and operation phases, please refer to the accompanying SWMP and Waste Assessment Report.

### Ecology

- 5.174 London Plan Policy 5.3 (Sustainable Design and Construction) states that development proposals should promote biodiversity and green infrastructure.
- 5.175 Policy 5.11 (Green Roofs and Development Site Environs) states that major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible. As previously discussed, the proposed development comprises planted areas on the fourth and fifth floor totalling 235 sqm and a green roof of 240 sqm. Combined, these areas will result in a net gain in habitat of an ecological value of 475 sqm. Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.
- 5.176 Local Plan Policy A3 (Biodiversity) explains that the Council will protect and enhance sites of nature conservation and biodiversity by:
- grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species; and
  - assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 5.177 Policy A3 further expects development to incorporate additional trees and vegetation where possible.
- 5.178 The existing site at 7ABC Bayham Street is previously developed land, occupied by commercial uses and has no ecological value. However the proposed scheme includes soft landscaping and planting on the roof. Therefore the proposed development would achieve an enhancement in ecology and biodiversity on-site, and complies with the relevant development plan guidance.
- 5.179 This application is supported by an Ecology Report which has been prepared by Royal Haskoning DHV. This report concludes that the proposed development will have no impact on any statutory designated sites, non-statutory designated sites, habitats or species – both during construction and operation. In fact, during operation, a minor beneficial impact is anticipated due to a net gain in habitat of ecological value, associated with the green roof. In consideration of the above, the

proposed development is in compliance with London Plan Policies 5.3 and 5.11, and Local Plan Policy A3.

### Flood Risk

- 5.180 London Plan Policy 5.12 (Flood Risk Management) explains that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and technical guidance.
- 5.181 Policy 5.13 (Sustainable Drainage) states that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 5.182 Policy 5.14 (Water Quality and Wastewater Infrastructure) expects development proposals to ensure that adequate wastewater infrastructure capacity is available in tandem with development.
- 5.183 Policy 5.15 (Water Use and Supplies) states that development should minimise the use of mains water by:
- incorporating water saving measures and equipment; and
  - designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.
- 5.184 Local Plan Policy CC3 (Water and flooding) explains that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 5.185 The application site is located within Flood Zone 1 which is recognised as having the lowest risk of flooding; and according to the Environment Agency (EA) data, the site is not located within a Groundwater Source Protection Zone.
- 5.186 The existing site is fully developed and comprises buildings (without green or blue roofs) and hardstanding only. The proposed development includes soft landscaping on the roof, which would help to reduce surface run-off. This represents an enhancement in terms of preventing flood risk.
- 5.187 In accordance with the relevant development plan policy guidance, water saving fittings and appliances shall be installed in the building. The following form a basis of the proposals:
- Dual flush toilets of 6/3 litres;
  - Water consumption levels not higher than 4.5 litres/minute in wash hand basins and 5 litres/minute in kitchenette taps;
  - Showers (where present) with a maximum flow rate of 8 litres/minute at 3 bar pressure.

- 5.188 In consideration of the above, the proposed development proposal fully accords with the development plan, and as the accompanying Hydrological Assessment Report concludes, there are no matters of potential concern.

### Contamination

- 5.189 London Plan Policy 5.21 (Contaminated Land) explains that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 5.190 Local Plan Policy A1 (Managing the impact of development) expects proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required.
- 5.191 This application is supported by a Site Investigation Report, prepared by Risk Management Ltd, which concludes that no remedial measures are required in relation to the proposed development.
- 5.192 Therefore, the proposed development accords with the Development Plan.



## 6 PLANNING BENEFITS

- 6.1 This Section sets out the planning benefits of the proposed development which are material consideration in support of the proposed development and should therefore form part of the planning assessment. The following benefits of the development should be weighed against any perceived harm.

### Economic Benefits

- 6.2 There are a number of economic benefits resulting from the scheme as detailed below:
- Direct employment of the hotel is 29, being 15 at the hotel room servicing, 11 in the café/bar and 3 in management and maintenance;
  - Direct employment GVA is estimated as £622,949 pa;
  - The office space could support 53 full time equivalent jobs; and
  - Guests at 61 beds at 80% occupancy would spend around £980,000 locally on their trips, being £494,000 on eating out, £148,000 on entertainment and the remainder on shopping £339,000. This could support up to 15 jobs locally.
- 6.3 Co-working space is increasingly popular and it is to be ideally located to support small local businesses in important sectors such as TMT and creative industries. These industries are integral to Camden's economy, and the development will therefore support Camden's continued success as a creative hub.
- 6.4 The hotel space is also important as this helps to support Camden's tourist industry which supports a high number of jobs both directly and indirectly.

### Heritage and Townscape Benefits

- 6.5 A heritage benefit as a result of the development, has been identified as follows:
- Redeveloping a 'neutral' site in the Conservation Area to deliver a high quality building which preserves and enhances the character and appearance of the Conservation Area.
  - Infilling a gap in the townscape, replacing with a high quality building which adds vibrancy and activity to the street and mix of uses locally.

### Planning Obligations

- 6.6 Camden's CPG 8- Planning Obligations sets out the Council's position on all matters relating to planning obligations and CIL.
- 6.7 Following the pre-application discussions with the LPA, the proposed draft heads of terms are set out below:

- A commitment to provide affordable workspace on site – assumed to be 20% of desks at a 50% discount. For more information regarding this, please refer to the accompanying Affordable Workspace Proposal;);
- A contribution towards off site housing, including affordable housing – in accordance with policy H4;
- A contribution towards local employment & training initiatives;
- A commitment to seek to provide apprenticeships during the construction phase of the development;
- A commitment to seek to provide employment opportunities once the hotel is operational; and
- A contribution towards the provision and maintenance of public open space.

## CIL

- 6.8 The Mayoral CIL rate for Camden is £50 per sqm. In terms of Camden's CIL, the site is within 'Zone B', drawing a rate of £25 per sqm for office developments, and £30 per sqm for hotel developments.
- 6.9 The appropriate CIL form has been completed by GL Hearn on behalf of the applicant and is submitted with this planning application.

## 7 CONCLUSIONS

- 7.1 This Planning Statement has been prepared in support of a full planning application for the proposed demolition of existing buildings and erection of a new 5 storey building comprising office floorspace (B1a Use Class), hotel accommodation (C1 Use Class) and an ancillary café/bar at 7ABC Bayham Street.
- 7.2 Specifically, the proposed development includes:
- Demolition of existing buildings on-site (530 sqm GIA of B1a office space);
  - Erection of a new building of 5 storeys and 2 basement levels;
  - 691 sqm GIA of new co-working office floorspace (B1a Use Class);
  - 61 No. of hotel bedrooms (including 9 accessible bedrooms – 14%);
  - An ancillary café/bar at ground floor – open to both guests, office workers and the public;
  - Servicing from Bayham Street;
  - 16 No. cycle parking spaces for guests and staff at basement level 1; and
  - Zero car and coach parking (to be controlled through a Section 106 Agreement).
- 7.3 The proposal makes a more efficient and effective use of an under-utilised, previously developed site, in a highly sustainable and accessible location, on the edge of Camden Town Centre. The principle of development is therefore wholly in accordance with the planning objectives of Paragraphs 11, and 111 of the Revised NPPF, and Policy G1 of the Camden Local Plan (2017).
- 7.4 The development proposal has been fully informed by a comprehensive and constructive pre-application process, which has included 4 pre-application meetings with Camden's Planning Officers, 2 Design Review Panel meetings and a public consultation event. The pre-application process concluded with support for the scheme being gained from Officers and DRP members.
- 7.5 The proposed height, scale and massing of the scheme has been carefully considered to respect the surrounding built context. DRP members confirmed that the height and massing of the scheme was acceptable. It has since reduced further.
- 7.6 The proposed design has also been carefully considered, to ensure the character and appearance of the Camden Town Conservation Area has been preserved and enhanced. It is considered the warehouse style is appropriate for this site and uses, and the material palette positively responds to the street scene.
- 7.7 The principle of the proposed office use is acceptable in principle, as the scheme involves intensifying the existing B1a use with a higher quality and larger facility. The office use is wholly

compliant with London Plan Policy 4.2 and Policies E1 and E2 of the Local Plan. The Council's EDO has confirmed that the proposed office floorspace is acceptable.

- 7.8 The principle of hotel accommodation within the scheme is considered acceptable as the Site is located on the edge of Camden Town Centre and within a highly accessible area. The case for why hotel use is more appropriate than residential in this instance is outlined in Section 5 of this Statement. The proposed development complies with London Plan Policy 4.5, and Policies E3 and H2 of the Local Plan. Pre-application discussions have confirmed this to be the case.
- 7.9 The holistic commercial offering of the scheme would be a great asset to the locality and would complement the existing services and facilities available within Camden. The proposed development would deliver a significant amount of economic and public benefits (which are outlined in the previous section of this Statement). The proposed development would lead to an increase in jobs on site from 41 (as existing) to 82; and provide local start-ups and SMEs with a new flexible co-working facility, new hotel accommodation, a new café/bar for the use of the public.
- 7.10 It is concluded that the proposals comply with the Development Plan and other material considerations also weight in favour of the application. For these reasons planning permission should be granted.