

Our ref: J038348
Your ref: 2018/3647/P

Mr Patrick Marfleet
Senior Planner
Planning Services,
London Borough of Camden 2nd Floor,
5 Pancras Square c/o Town Hall,
Judd Street,
London
WC1H 9JE

13th December 2018

Dear Patrick,

Planning Application Reference: 2018/3647/P
7abc Bayham Street, Camden, London NW1 0EY

We write in response to the objection letter from the residents of 2 King's Terrace, 4 King's Terrace and 9 Bayham Street, dated 9th October, which objects to planning application 2018/3647/P for four principal reasons:

1. The principle of a hotel development at this site;
2. Alleged impact of overlooking, loss of privacy and outlook;
3. Alleged impacts of noise and disturbance; and
4. Impacts on daylight/sunlight enjoyed by neighbouring properties.

Further objections have been prepared by GIA (Daylight/Sunlight), Fuller Long (Heritage) and Vanguardia (Noise) on behalf of the residents of 2 King's Terrace, 4 King's Terrace and 9 Bayham Street.

As such, the project team have prepared and co-ordinated a full and considered response to the points made.

Enclosed with this letter is a response from:

- Ambigram Architects on amenity;
- Point 2 Surveyors (Daylight/Sunlight Consultants) on daylight/sunlight;
- Sandy Brown (Acoustic Consultants) on noise; and
- Heritage Collective on heritage.

This letter considers the points raised in respect of the principle of the proposed development only.

Principle of a hotel

The Site and its Context

The Site currently comprises existing office space and therefore is commercial in character.

The Site has historically been in commercial use and in our view it would be appropriate to deliver further commercial uses on-site.

The character of the area is mixed but considered commercial, as confirmed by the Conservation Area Appraisal "Sub Area 1 ('Commercial') and as agreed through pre-application discussions.

As such, it is considered appropriate to deliver a mix of commercial uses on-site, including the intensification of office floorspace (to accord with Policy E2).

Planning Policy Context

London Plan Policy 4.5 confirms the strategic need for more hotel bedrooms in London.

Local Plan Policy E3 seeks to direct new hotel development to Central London, town centre locations, and to areas with high accessibility.

In this context, and in light of the advice in the NPPF (Section 7) it has been suggested that a sequential assessment should be provided. The purpose of this test is to avoid developing town centre uses in out of centre locations as this can have the effect of harming its vitality, viability and competitiveness. In the pre-application process it was agreed with officers that the Site is in an edge of centre location that is suited to the proposed development and it was unlikely that other sites would be found that were sequentially preferable. As such, it was agreed that no sequential assessment would be required in this instance.

The proposed hotel accommodation would be located on the edge of Camden Town Centre in a highly accessible area with a PTAL rating of 6B. The Site is well connected and related to the town centre, its main tourist and leisure attractions, and to public transport. Evidently the hotel, which includes significant office floorspace aimed at the local SMEs would complement the town's current business, leisure and tourism offer, not harm it.

Nonetheless, we will discuss with officers the matter of the sequential assessment further and respond formally to the point raised on this matter.

The objection letter also suggests that the application departs from Policy E3 of the Local Plan as a result of the scale of the hotel.

Policy E3 "expects new, large-scale tourism development and visitor accommodation to be located in Central London..." and "allows smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage".

The sub-text to Policy E3 of the Camden Local Plan (2017) confirms that flexibility is to be applied when considering what constitutes 'large-scale developments':

"The Council will generally consider large-scale developments to be those that provide additional floorspace of 1,000sqm or more."

(our emphasis)

In this context the scale of hotel (61 bedrooms / 1,109 sqm GIA) is considered to be appropriate for its location where it will benefit from excellent accessibility (PTAL 6b) and a location on the edge of Camden town centre.

Furthermore, part c of Policy E3 considers hotel development outside existing centres appropriate "where it would have a local or specialist focus". The synergy between the hotel and co-working space is clear and directly speaks to the creative industries, entrepreneurs and numerous SMEs operating locally in Camden town centre.

The hotel would not be a “bolt-on” to the office space as the objection letter implies, but rather the scheme will be a single entity, accessed via a single entry point/reception, and comprising a mix of compatible commercial uses. The hotel is therefore not conventional and is considered to be ‘specialist’.

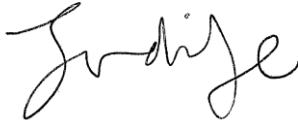
It is also worth noting that the scheme has reduced in scale throughout the pre-application discussions and it is our view (shared by officers) that the hotel is of an appropriate scale for its location, and is as small as possible whilst being a viable development, and delivering the enhanced office floorspace and wider public benefits, including:

- Direct employment of the hotel is 29 FTE jobs, 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;
- 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.

Given all of the above, it remains our position, as set out in full within the Planning Statement, that the hotel is acceptable in principle, and is in accordance with the relevant policies of the development plan.

We trust the information provided with this submission is sufficient to deal with the matters raised by neighbours of the site, and we will be in touch with officers shortly to discuss further. Please also note that contact has been made with neighbours in order to seek a resolution to these matters.

Yours sincerely



Jonathan Ordidge
Senior Planner

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