

Our ref: J034736
Your ref: 2017/6967/P

Jaspreet Chana
Planning Officer
London Borough of Camden
2nd Floor
5 Pancras Square
London
N1C 4AG

5th December 2018

Dear Jaspreet,

Holiday Inn Express, 152-156 Finchley Road (Ref: 2017/6967/P)

Further to recent correspondence, we hereby submit amendments to the above scheme which responds to the comments relating to the design that you raised.

Following the provision of two sets of design options to you, and your confirmation, from the options discussed, as to the preferred design, we hereby submit a formal amendment to the above planning application incorporating these changes.

Further discussion, explanation and justification of the amended design is set out within "*Design and Heritage*", below.

The amendments are incorporated within the below substituted drawings and documents:

Substituted Drawings and Documents

The schedule below details the revisions to the submitted drawings. A full pack of these drawings is supplied under this cover.

Schedule 1: Original and Revised Drawings

Title	Reference	Original	Revised
Location Plan	PL100	A	A
Existing Site Plan	PL101	A	A
Proposed Site Plan	PL102	A	A
Existing Ground Floor	PL200	A	A
Existing First Floor	PL201	A	A
Existing Fourth Floor	PL204	A	A

Existing Fifth Floor	PL205	A	A
Existing Sixth Floor	PL206	A	A
Existing Roof	PL207	A	A
Proposed Ground Floor	PL300	A	C
Proposed First Floor	PL301	B	D
Proposed Second Floor	PL302	A	C
Proposed Third Floor	PL303	A	C
Proposed Fourth Floor	PL304	A	C
Proposed Fifth Floor	PL305	A	C
Proposed Sixth Floor	PL306	A	C
Proposed Roof	PL307	A	C
Existing South West Elevation	PL400	A	A
Existing North East Elevation	PL401	A	A
Existing North West Elevation	PL402	A	A
Existing South East Elevation	PL403	A	A
Proposed South West Elevation	PL410	-	A
Proposed North East Elevation	PL411	-	A
Proposed North West Elevation	PL412	-	A
Proposed South East Elevation	PL413	-	A
Existing Cross Section	PL500	A	A
Proposed Cross Section	PL501	A	[Deleted]
Proposed Cross Section	PL502	[N/A]	A
Proposed Section Elevation	PL510	[N/A]	A

The following documents, supplied with the planning application, are hereby updated, and replaced, as follows:

- Design and Access Statement (October 2018) replaces: Design and Access Statement (November 2017);
- Daylight and Sunlight Report (November 2018) replaces: Daylight and Sunlight Report (September 2017);
- Transport Assessment (November 2018) replaces: Transport Assessment (November 2017);
- Travel Plan (November 2018) replaces: Travel Plan (November 2017); and
- CIL Additional Questions Form (Updated).

This Cover Letter updates and supplements the submitted Planning Statement (December 2017).

In addition, the following additional document is hereby submitted:

- Land Opportunity Assessment (December 2018).

Principle of Development

The amended design continues to consist of an alteration and extension to the existing hotel (C1 use) at this location which currently provides 79 bedrooms. The amendments mean the development will provide a net additional 51 hotel (C1 use) bedrooms. Following development, the hotel would consist of 130 bedrooms. This is a net reduction of 5 bedrooms when considered against the scheme as originally submitted.

The development in a town centre which enjoys fast tube and bus links into Central London. The Council's pre-application response confirmed that, "*the principle of a hotel extension in this location is generally supported.*"

As such, the principle of development continues to be in full accordance with **Policy E3** of the Camden Local Plan and **Policy 4.5** of the London Plan.

Mix of Uses

We welcome your confirmation that, pursuant to **Policy H2** of the Camden Local Plan, the site is not suitable for the provision of housing as part of a mixed-use development.

You requested that we demonstrate that there are suitable and available sites within the defined area that can accommodate the requisite residential (C3) accommodation off-site. Accordingly, we have commissioned a *Land Opportunity Assessment*. This confirms that there are no suitable and available off-site locations for this provision.

Accordingly, the applicant will consider a commuted sum in lieu of this provision in negotiation with the Council, informed by scheme viability.

Accordingly, the proposed development continues to accord with the requirements of **Policy H2** of the Camden Local Plan.

Design and Heritage

During determination of the application, there have been a number of elements of the design to which officers considered required refinement. Accordingly, the proposed development has been amended to reflect these as detailed below.

The elevational appearance of the extension has been redesigned to add additional interest to the building, as well as to more closely reflect the design of both the host building and Frogmal Court adjacent. While the height continues to match that of Frogmal Court (as extended) the uppermost floor has been set back in a mansard style and given a segregated pitch. This not only gives the impression of a reduced height, it also reflects the set-back arrangement on the uppermost floors of both the existing hotel and the extension to Frogmal Court.

The design now incorporates full-length windows. As requested by officers, the drawings now include a detailed section showing the design of the proposed windows.

While the overall height of the building remains unchanged, the amendments to the elevational treatment add interest to the building and create the impression of a decrease in height, as well as a reduction in mass.

The depth of the extension has been reduced by integrating the staircase into the building and removing the rear projection to accommodate this.

These amendments represent a betterment of the existing design, which was already considered in accordance with relevant policy. Accordingly, the amended design is considered to continue to be in accordance with the principle design policies contained at **Policy D1** of the Camden Local Plan and Policies 7.3, 7.4 and 7.6 of the London Plan.

Furthermore, given the fact the proposal continues to be concealed from those elements of the Conservation Area that contribute to its setting and accords to heritage policies at **Policy D2** of the Camden Local Plan and **Policy 7.2** of the London Plan.

Amenity

The impact of the revisions to the proposed development in terms of the levels of sunlight and daylight that is experienced by adjacent residential occupiers has been assessed within the revised *Daylight and Sunlight Report* (19 November 2018).

As with the original design, this has assessed windows and gardens at a number of surrounding buildings, including 14-21 Frogmal Court and 150 Finchley Road that may be affected by the proposals in terms of daylight, sunlight and overshadowing. This found that, in terms of daylight, most windows would either continue to meet BRE guidelines post-development, or, where there are shortfalls, these would not be significant, given the context of the rooms served.

In terms of sunlight, the report considers that the only window adversely affected does not serve a living room, and thus all relevant windows meet BRE guidelines. No gardens were found that would be overshadowed by the proposals.

Sustainable Transport

The amendments continue to 10 spaces (7 short stay and 3 long stay). This continues to be in accordance with London Plan standards.

Given the location of the proposal in an area of high public transport accessibility, its utilisation of walking and cycling routes and the provision of cycle parking, the proposed development, as amended, continues to perform strongly in terms of sustainable transport. Accordingly, the proposal complies fully with **Policy T1** of the Camden Local Plan and **Policies 6.9 and 6.10** of the London Plan.

Car Parking

The amended development will continue to provide 3 accessible parking spaces to the rear, as opposed to the existing 2 at present. Accordingly, the proposal remains in full accordance with the local and London

requirements for car free development, with provision only for people with disabilities. Coach drop-off facilities will be retained as existing.

Therefore the proposal remains in full accordance with the requirements of Camden Local Plan **Policy T2** and **Policy 6.13** of the London Plan.

Transport Impacts

The Transport Assessment, submitted in support of the proposed development, has been updated to reflect the revised proposal.

This has found that there would continue to note that the proposal, as amended would not have any impact on the local highway impact of transport network.

Notwithstanding this, the draft Travel Plan supplied with the original proposal has been updated.

Accordingly, the development confirms to the requirements of Camden Local Plan **Policies A1 and T4** and London Plan **Policy 6.3** in terms of managing and mitigating against transport impacts of the development.

Other Considerations

It is considered that the other relevant planning matters associated with the proposal, namely sustainability, Flooding and Drainage, Contamination, Trees and Ecology will be unaffected by the design revisions. As such, the reports and justification submitted pursuant to those matters, stand.

Conclusion

The design amendments to the proposed hotel, which result in a small net reduction in the number of bedrooms proposed, have been made to address the comments raised by officers during determination. While the applicant considered that the proposal was already in accordance with relevant policy, the amended design will improve that performance further in design terms.

The impact of the design amendments have not breached amenity and transport requirements, where relevant daylight and sunlight tests, parking standards and transport impacts continue to be acceptable, and this application should therefore be supported.

I look forward to confirmation of receipt of these drawings and look forward to discussing this amended design with you.

Many thanks.

Yours sincerely,

A large black rectangular redaction box covering the signature area of the letter.

Richard Robeson
Senior Planner
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