

Sequential Assessment

7abc Bayham Street, London, NW1 0EY

INTRODUCTION

We are instructed by our client, Camden Lifestyle (UK) Ltd., to conduct a Sequential Assessment in relation to planning application ref: 2018/3647/P for the construction of a 2,279 sqm 61-bed hotel (Use Class C1) with 691 sqm co-working office floorspace (Use Class B1(a)). The total GIA of the proposed development is 2,970 sqm.

The site is located in an edge of centre location and therefore as the application proposes “*main town centre uses*” it needs to be accompanied by a Sequential Assessment (in accordance with Paragraph 86 of the NPPF).

A Sequential Assessment Scoping Note was submitted to the Council to confirm the parameters of the Assessment and provide initial commentary on potential sites to be considered. The scope was subsequently agreed with the Council in January 2019. This document therefore comprises the Sequential Assessment as agreed with the Council prior to its submission.

POLICY AND GUIDANCE ON SEQUENTIAL ASSESSMENTS

A Sequential Assessment is used to identify whether there are any sequentially preferable sites (*i.e. suitable or available*) in relation to a specified town centre for accommodating main town centre uses (*i.e. the proposed development*). A Sequential Assessment is more commonly associated with retail schemes, however, they relate to many main town centre uses including offices and hotels.

Sequential Assessments should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.

The NPPF (2018) states:

86. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

87. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise

Planning Guidance contained in the PPG (Ensuring the vitality of town centres – paragraph 10) provides further clarification on the role of the sequential test in decision taking. In summary this paragraph confirms:

“It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible the local planning authority should support the applicant in undertaking the sequential test, including

sharing any relevant information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.”

PPG paragraph: 11 adds:

“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification. Importantly, in addition to national policy and guidance, there are two key decisions, which are material to the application of the sequential test”.

Policy TC1 of the Local Plan (2017) states:

“The Council will apply a sequential approach to retail and other town centre uses outside of the areas listed above to support Camden’s network of centres. Retail and other town centre uses should be located in designated centres. Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations”.

THE DEVELOPMENT PROPOSAL

The 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 coworking 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.”

The proposed development comprises:

- Demolition of existing buildings on (530 sqm GIA of B1a office space);
- Redevelopment and intensification of an existing employment site (B1 Use Class) of 0.06 ha;
- 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);
- 2,279 sqm (GIA) hotel (61 bedrooms- including 8 accessible rooms);
- An ancillary café/bar at ground floor – open to both guests, office workers and the public;
- On-street servicing from Bayham Street;
- Zero car and coach parking; and
- 16 No. cycle parking spaces for guests and staff at basement level 1; and

The scheme includes two ‘main town centre’ uses: office (B1) and hotel (C1) use with an ancillary café, although all function within a single building and each use being mutual beneficial to the others.

The applicant seeks to deliver a high quality mixed use development comprising co-working office and hotel uses, with commercial and operational synergy between these uses. There will be one single entrance point, and the building is to be operated as a single entity.

The intention is to provide a facility that would support (and be supported by) the local creative industries sector and SME’s, whilst capitalising on the ever-strong tourist and leisure economy in Camden Town Centre. Both uses are considered integral to each other, as is the café, which will be used by both visitors of

the hotel and office space, as well as members of the public. The necessity for the various elements to be co-located is therefore established.

It is considered that the proposed development will enhance Camden Town Centre in terms of vitality, viability and competitiveness. The hotel/office will function as part of the Town Centre and will attract and support local tourism. An example of this is KoKo, which is located approximately 50m to the west of the site and where the owners have provided a letter of support on this basis.

There will be no parking or servicing on site, with the later taking place from an on street position making the best possible use of the site and responding to its highly accessible location.

THE APPLICATION SITE

The application site immediately adjoins the boundary of Camden Town Centre, with the western boundary of the application site forming part of the Town Centre boundary (Figure 1). The Town Centre is also easily accessible from the site. on this basis, the site considered *'edge of centre'*.

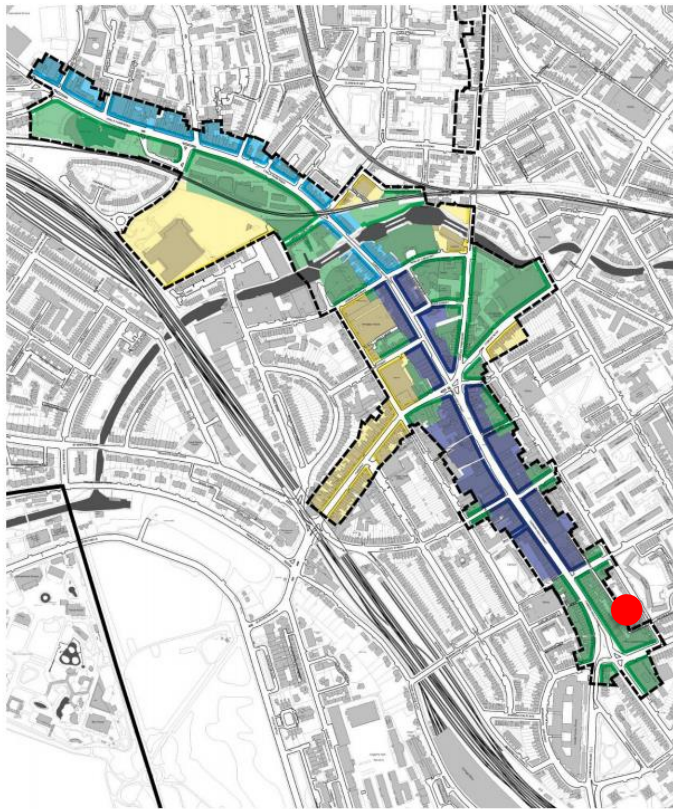


Figure 1 - Extract from Town Centres, Retail and Employment CPD – Camden Town Centre.

Green: Secondary Shopping Area

Blue: Primary Shopping Area

The site is not allocated for a particular use but its intensification for employment purposes and mixed use development is supported by the development plan.

The site is almost square in plan (making an efficient development achievable) and is adjoined to the north and south by built form, and to the west by private access route and boundary wall. It comprises 530 sqm

(GIA) office floorspace (Use Class B1a) across 3 units and arranged around a central external space. The site is in a single ownership (that of the applicant).

The Site is considered to be underutilised given its low density and highly accessible location in close proximity to Camden Town Centre.

The site has a PTAL of 6b (i.e. the very best) and is located approximately a 2 minute walk from Mornington Crescent Underground Station (less than 100m) via a well-lit pavement and pedestrian crossings. The site is also approximately an 8 minute walk (550m) from Camden Town Underground Station, a 14 minute walk (900m) to St Pancras International Station and a 15 minute walk (1km) to Kings Cross Train Station and Underground Station. In this context, the site is very well located for the proposed uses.

Camden High Street (Secondary Shopping Area) which contains a range of shops, café's, restaurants, bars and leisure uses is located a 1 minute walk from the site (approximately 50m) via well-lit pavements. The site is located 120m south east of the Camden Town Core (south) Shopping Area and again, this area is very easily reached on foot by well-lit pavements. Once more, the site is very well located for the proposed uses with visitors being able to take full advantage of all of the local amenities, contributing to their viability and vitality.

The site fronts Bayham Street; a well-lit, well-paved highway. Given this, the site is easily found when travelling from the High Street or local transport connections, and the visitor experience will be a pleasant one given the quality of the local environment. These are key commercial requirements when considering other sequential sites.

In summary, the application site has been selected on the basis of its:

- Size and layout – suitable for the proposed development, enabling an efficient layout and appropriate scale and format of development;
- Non-allocation – previously developed land in a highly accessible location. The development plan supports the site's intensification of use and redevelopment for mixed use purposes;
- Location adjoining the Town Centre Boundary – the western site boundary forms part of the Town Centre boundary;
- Close proximity to defined Secondary Shopping Area and Camden Town Core (south) Shopping Area, and all of the amenities these areas offer. The development will support the vibrancy and vitality of Camden Town Centre, and will in turn be supported by visitors to the area;
- Pedestrian accessibility to Mornington Crescent Station (less than 2 minute walk));
- Pedestrian and transport accessibility to Camden Town Underground Station (less than 8 minutes) St Pancras International Station (14 minute walk) and Kings Cross Train Station and Underground (15 minute walk); Ability to have on-street servicing – maximising the efficient use of the site; and
- Good street environment – enabling a street presence for the development and creating a positive visitor experience.

SEQUENTIAL ASSESSMENT

Within this Sequential Assessment, we have only considered sites within Camden Town Centre or in a comparable 'edge of centre' location as these are the only sites which could be considered sequentially preferable to the application site.

Given the hotel and office space is of a scale and format that is intended to serve Camden Town Centre (i.e. serve a local market) and the site adjoins the edge of the Town Centre, there is no requirement to consider other Town Centres, including those of a lesser designation.

The proposed scope of the assessment is considered to be reasonable and proportionate to the development and local circumstances.

When assessing potential sites, there are two key questions in order to determine if a site is indeed sequentially preferable. These elements are suitability and availability.

Suitability

When assessing the suitability of the site, it is important to confirm whether or not the site is sequentially preferable to the application site, i.e. is it closer to the town centre and that the sequential alternatives could accommodate a development that is 'broadly similar' to the proposal.

The site size should not be demonstrably smaller or larger than the application site but having regard to the requirement for flexibility, we consider an allowance of -15% could be appropriate. This approach is considered to be reasonable and suitably robust.

The key physical and locational characteristics of the site should also be considered in terms of its suitability for the proposed development. Above we have set out the key aspects of the application site that make it suitable for the proposed development. For an alternative site to be suitable (and sequentially preferable) these will need to apply.

Though not strictly a 'test' viability is a matter for consideration in the context of a site's suitability. There is no definition of 'viability' in the PPG (in respect of the sequential assessment) or the NPPF. However, superseded guidance (PPS4 Practice Guidance) defined 'viability' as whether or not there is a reasonable prospect that development will occur on a site. This includes market factors (land values, attractiveness of the locality and level of potential market demand), cost factors (site preparation costs, planning obligations, prospects of funding) and delivery factors (phasing requirements and completion dates).

Availability

The new NPPF (Para. 86) requires a consideration of sites that are available for the proposed development now or that is likely to become available for development within a reasonable period of time.

There is much case law that discusses the test of 'availability' (and suitability) but this invariably refers to retail schemes, and far more complex sites rather than the relatively small scale mixed office and hotel proposals being considered here. Nonetheless, it has been held that factors such as the urgency of the need for the development, or importance of delivering a development plan requirement should be considered. What is a reasonable period of time for a site to become available is ultimately a matter of judgement for the decision maker.

The availability of a site also requires consideration as to whether or not there are any insurmountable legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners.

Flexibility

The NPPF (Para.87) requires that flexibility be shown in matters such as the format and scale of a development so as to maximise opportunities for using alternative sequentially preferable sites.

In this instance, the ability to be flexible is limited because:

- The format of the development is a mixed use office/hotel building that operates under a single management and where the uses benefit from commercial synergies;
- Servicing is to take place from the street, meaning there is no servicing space to cut from the proposals;
- There is no car parking provided, meaning there is no parking spaces to be cut from the scheme;
- The hotel and office component need to be served by an ancillary café to address the needs of guests and workers. It is not commercially appropriate to remove the café from the scheme;
- The development plan requires an intensification of the existing employment space as part of a mixed use development, so the reduction of the employment space is restricted. Further, a critical mass of employment space is required to make it viable and attractive to occupiers; and
- Scheme viability is already under pressure and further reduction in floorspace is not viable.

Notwithstanding the above, we can consider sites which are up to 15% smaller to demonstrate appropriate flexibility. To achieve this reduction in scale, the scheme would need to exclude the fitness suite and/or could marginally reduce the amount of workspace or bedrooms. Such reductions to the scheme could only be minimal so as not to undermine the viability and deliverability of the proposed development.

Sites for Assessment

When identifying *suitable* sites to be assessed, we have considered the following criteria to establish (derived from the application site's locational and physical characteristics outlined above):

- Size – the site should be of comparable size. To show flexibility we have looked at smaller sites up to 15% smaller;
- Land use/allocation – the site should be in B1 Use Class or use that isn't protected by policy and is compatible with the proposed development. The site should not be allocated for other uses not included in the proposed development;
- The site should be either in centre, or as close to the town centre boundary as the proposed development;
- The site should be equally close to the defined Shopping Areas and access to them should be equally as suitable;
- The site should be equally as accessible to an underground station serving Camden Town Centre (i.e. Camden Town or Mornington Crescent);
- The site should have the ability to have on-street servicing; and
- The site should benefit from an equally good street environment and have the opportunity for a comparable street presence.

CONCLUSION

To assist with the identification of sites we have reviewed the Site Allocations DPD (2017), the Proposals Map (2017) and online mapping tools. We have also used our knowledge of the area.

As a result of our review we have been unable to identify any sites that would meet the above criteria and be considered suitable for the proposed development.

The sites allocated for development in/around Camden Town Centre are considerably larger than the proposed development site and are required to deliver other uses such as residential, retail and leisure in any case. Even showing flexibility in the scale and format of the proposed development these sites would not be suitable. It is also understood that the owners of these sites are actively pursuing planning permission for development (responding to their respective allocations) and in this context are also not considered to be available.

We have not identified any non-allocated sites in a sequentially preferable location or that would meet the above criteria.

Our conclusion is therefore that there are no sequentially preferable sites and the proposed development at 7ABC Bayham Street occupies the primary sequential site in relation to Camden Town Centre.

In responding to the Sequential Assessment Scoping Note the Council has also confirmed that there are no other suitable or available sites that could accommodate the proposed development.

As a result of this conclusion, it stands that the application site is the most sequentially preferable site for the proposed development.