

Planning Statement

115-119 Camden High Street

On behalf of: Demar (BVI) Holdings Limited

June 2019

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1 Introduction

1.1 This Planning Statement ('the Statement') is submitted in support of a detailed planning application ('the Application') made on behalf of Demar (BVI) Holdings Limited ('the Applicant') for the demolition and redevelopment ('the Proposed Development') of 115-119 Camden High Street, London, NW1 7JS ('the Site').

1.2 This statement sets out the planning case in support of the application. It summarises the planning history of the site and assesses the proposed development in the context of relevant policies and guidance.

1.3 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for:

“Demolition of existing building and erection of a part 4 part 5 storey building comprising retail floorspace (Class A1), hotel (Class C1) and 3 affordable residential units (Class C3) and associated works”.

1.4 The statement is structured as follows:

- Section 2 – description of the site and surroundings;
- Section 3 – details of the site's background and planning history;
- Section 4 – details of the pre-application consultation;
- Section 5 – details of the development proposals;
- Section 6 – relevant planning policy framework;
- Section 7-12 – consideration of material planning considerations arising from the application proposals;
- Section 13 – a summary of the planning obligations arising from the proposals;
- Section 14 – summary and conclusions.

1.5 The proposed development has been designed by Morris + Company Architects ('Morris and Co') and is described in Section 6 of this statement as well as the Design and Access Statement prepared by Morris and Co. The interior of the proposed development has been designed by Axiom Architects ('Axiom') in partnership with Morris and Co. This statement should be read in conjunction with the plans and

drawings submitted, as well as the following documents which are submitted in support of this application (in addition to this statement):

- Design and Access Statement, prepared by Morris + Company Architects;
- Daylight and Sunlight Assessment, prepared by Point 2 Surveyors;
- Noise Impact Assessment, prepared by 24 Acoustics;
- Air Quality Assessment, prepared by Phlorum;
- Transport Assessment (including Travel Plan, Waste Strategy and Delivery and Servicing Management Plan), prepared by RGP;
- Energy Statement, prepared by PSH;
- Sustainability Strategy (including BREEAM Pre-Assessment), prepared by PSH;
- Draft Construction Management Plan, prepared by JLL;
- Statement of Community Involvement, prepared by Four Communications;
- Heritage, Townscape and Visual Impact Assessment (including Verified Views), prepared by KM Heritage;
- Sustainable Urban Drainage Strategy, prepared by Clancy;
- Structural Report, prepared by Clancy;
- Basement Impact Assessment, prepared by Clancy;
- Operational Statement, prepared by Whitbread.

- 1.6 This statement sets out the planning assessment of the proposed development and assesses it in the context of national, regional and local planning policy and guidance.

2 Site and Surrounding Area

- 2.1 The site comprises 115-119 Camden High Street located within the London Borough of Camden.
- 2.2 The building is located on the northern corner of Camden High Street and Delancey Street and comprises a two storey building (plus a small basement level) in retail (Class A1) use throughout. The building is currently occupied by Sports Direct.
- 2.3 The site is located within Camden Town Centre and forms part of a primary protected frontage on Camden High Street and a protected secondary frontage on Delancey Street. The site also sits within the Camden Town Conservation Area.
- 2.4 The site is not a listed building, however it is identified as a 'Positive Building' in the Camden Town Conservation Area Townscape Appraisal Map (2006). No. 104 Arlington Road (the former LCC Tramways Substation), to the rear of the site, is Grade II Listed. In addition, No. 111-113 Camden High Street (The Blues Kitchen) to the south of the site, on the opposite side of Delancey Street is also considered a 'Positive Building' and 'Focal Building' within the Camden Town Conservation Area Townscape Appraisal (2007).
- 2.5 The existing building is not the original one constructed on the site but was built in the inter-war period for Woolworths. Whilst it fits the character as part of the eclectic mix of architectural styles that makes up the High Street in reality from street level, due to its relatively low height, it is dominated by its entirely modern and poor quality shopfront.
- 2.6 The character of Camden High Street and the surrounding area comprises a mix of different building styles and heights (approx. two to five storeys), and much of the buildings along the high street are identified as 'Positive Buildings' within the Camden Town Conservation Area Appraisal.
- 2.7 The architectural treatment of No.115-119 Camden High Street 'turns the corner' for 3 bays at the upper floor on Delancey Street and provides blind windows at ground level. The remaining building along Delancey Street consists of a long blank and

utilitarian elevation which provides a blank and uninviting frontage to the street (especially in comparison to the pub, The Blues Kitchen, on the opposite side).

- 2.8 We believe that the contribution that the building makes to the overall character and appearance of the conservation area is as a building that typifies the eclectic mix of styles and ages, rather than specifically for any special architectural or historical merits.
- 2.9 To the rear of the site lies Signmaker's Yard, which benefits from gated access and is utilised by the office occupiers of Bedford House to the north of the site (at 125-133 Camden High Street) for their cycle parking.
- 2.10 The surrounding area comprises a range of different uses including retail, office and residential use. The site is located approximately 240 metres to the south of Camden Town Underground Station which is served by both branches of the Northern Line. Camden Road Rail Station is located approximately 517m to the north-east of the site, Euston Station is located approximately 1km to the south and King's Cross is located approximately 1.2km to the south-east. The site is also located in proximity to a number of leisure facilities including Regents Park, ZSL London Zoo and Camden Market.

3 Relevant Planning History

- 3.1 A thorough review of Camden's online planning history register has been undertaken and concludes that there is no planning history for the site of relevance to the scheme proposals, all being related to advertisement consent or works to the shopfront. A full planning history table is provided at Appendix A.

4 Consultation and Engagement

- 4.1 The National Planning Policy Framework ('NPPF') (2019) emphasises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties, and good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community (paragraph 39). Paragraph 41 reiterates that the more issues resolved at the pre-application stage, the greater the benefits.
- 4.2 The consultation and community engagement process is fully described in the separate Statement of Community Involvement (SCI), prepared by Four Communications, which forms part of this application and sets out in detail a record of the consultation and engagement that has been undertaken.
- 4.3 The pre-application consultation process has included a public exhibition to inform key stakeholders and members of the public of the project and gather feedback from them.
- 4.4 The public exhibition was held on Thursday 24 January and Saturday 26 January. It attracted 45 attendees, including representatives from Camden Town Unlimited, the Albert Street Residents Association, Delancey Street Residents Association, Pratt Street Residents Association and local residents, workers and business owners. Circa 1,889 newsletters were distributed by hand to addresses close to the site ahead of the public exhibition. Letters and emails were sent to 10 local politicians and community stakeholders ahead of the exhibition, introducing the proposals and inviting them to attend or to have a private briefing on the proposals. A press release was also issued to the Camden New Journal (Circulation = 47,000) with details of this exhibition.
- 4.5 A project website was created (www.demar-camden.co.uk), which was updated so that local people could view details of the proposals and provide feedback online. This website appeared on the exhibition newsletter and was shared with exhibition attendees and in Camden New Journal. The website was updated to reflect the changes in the proposals.

- 4.6 The project team undertook a comprehensive stakeholder audit of the community around Camden, who were offered meetings at the time of the public exhibition and follow up exhibitions to share the updated proposals. To date, the project team has met with Camden Town Unlimited and the Delancey Street Residents' Association.
- 4.7 Throughout the consultation process, a dedicated telephone number, e-mail and mailing address were supplied and managed by Four Communications, providing further information to residents, local groups and stakeholders upon request.
- 4.8 As set out within the SCI, several key themes emerged from the consultation responses received, including:
- The dated and dilapidated state of the existing building, which was not considered to be in keeping with the character of Camden;
 - Particular enthusiasm for the plans for a new building and the proposed design (suggesting it would make a positive contribution to the area), albeit with concerns about the proposed height of the building;
 - Potential for the site to reduce anti-social behaviour in the area, especially along Delancey Street, where the widened pedestrian footpath was welcomed;
 - Positive response to the provision of affordable housing on site.
- 4.9 In addition to liaising with the local community, politicians and other stakeholder groups, the applicant and their team has engaged extensively with officers at Camden Council throughout numerous pre-application meetings (circa 8 in total) and two independent design review panels over the last year.
- 4.10 In summary, the proposed development has been the subject of an extensive pre-application consultation process with a wide range of consultees. The proposed development has evolved significantly over this period in response to comments from the Council, the Design Review Panel, amenity societies, and local stakeholders and interest groups.

5 Description of Proposals

5.1 This section of the Statement sets out the key aspects of the Proposed Development. A full explanation of the Proposed Development is set out within the Design and Access Statement prepared by Morris and Co and an assessment of the key aspects of the design is covered later within this Statement.

5.2 This Application seeks planning permission for the following:

“Demolition of existing building and erection of a part 4 part 5 storey building comprising retail floorspace (Class A1), hotel (Class C1) and 3 affordable residential units (Class C3) and associated works”.

5.3 A summary of the existing and proposed land use areas at the site are as set out in the table below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net Change GIA (sqm)
Retail (Class A1)	1,266 <i>Split across two floors comprising:</i> <i>First Floor: 589sqm</i> <i>Ground Floor: 609sqm</i> <i>Basement: 68sqm</i>	156	-1,110
Hotel (Class C1) (inclusive of 20sqm substation)	0	2,343	+2,343
Residential (Class C3)	0	341	+341
Total	1,266	2,840	+1,574

Table 1: existing and proposed land use areas

5.4 The existing building is dominated by its entirely modern and poor quality shopfront, which detracts from the character of Camden High Street and the Camden Town

Conservation Area. The existing building is disproportionately low within its immediate context, particularly as it is a corner building at the junction of Camden High Street and Delancey Street. Consequently, the building does not contribute positively to the streetscape and fails to make efficient use of the land.

- 5.5 The existing blank frontage along Delancey Street offers little to the street scene and lends to an environment where antisocial behaviour could take place. Furthermore, the footway along this stretch of Delancey Street is narrow and does not provide the most pedestrian friendly environment. As set out in Section 7 below, the existing building does not meet the requirements of modern retail occupiers. Accordingly, there is opportunity for the redevelopment of the site and to provide improvements to the surroundings.
- 5.6 Part of the redevelopment of the site includes the setting back of the building line both along Delancey Street and Camden High Street. The proposed ground floor of the new building will provide new active frontage on Delancey Street, which is designated as a secondary frontage within the Camden Local Plan, through the return Camden High Street retail frontage, and the new hotel and residential entrances. These interventions will offer a significant improvement in public realm terms.
- 5.7 The proposed building will accommodate retail (Class A1), hotel (Class C1) and residential (Class C3).
- 5.8 The retail floorspace will be located at ground floor level fronting onto both Camden High Street and Delancey Street. The proposals comprise the removal of the existing, poor quality shopfront and its replacement with a new, much higher quality shopfront that will be attractive to new retail tenants and significantly improve the appearance of this part of the high street. The optimal size of the proposed retail unit is designed to create the most cost effective, usable store layout to meet the needs of modern retailers who no longer demand larger retail floor plates with first floor secondary retail space, whilst still protecting the primary frontage.
- 5.9 The hotel will be located at part basement, ground and first to fourth floor levels, with its entrance on the newly widened Delancey Street footway and the bedrooms fronting both Camden High Street and Delancey Street. The proposed hotel would contain 80 bedrooms and would be operated by Whitbread as a 'Hub by Premier Inn', which

would include a café/bar area also open to the public. The Hub by Premier Inn model is based on the concept of providing affordable and high-quality visitor accommodation within Central London through contemporary well-designed and space efficient bedrooms.

- 5.10 The residential units will be located at the western end of the site, furthest from Camden High Street, with its own dedicated entrance accessed directly off Delancey Street. This part of the development will be ground plus three storeys. The residential units comprise 3 x 2 bed 3 person units, all of which will be high quality, social affordable rented tenure.
- 5.11 The cycle parking spaces for the commercial aspect of the development will be located in a secure cycle store within Signmaker's Yard at the west end of the site. The existing cycle parking located within Signmaker's Yard, comprising 20 covered Sheffield style cycle stands that currently serves the neighbouring office accommodation immediately north of the site at Bedford House, will be suitably re-provided within Signmaker's Yard as part of the development proposals. The cycle parking for the residential units will be located in a secure cycle storage within the ground floor lobby of the residential building.
- 5.12 The required plant for the development will be located within a screened plant enclosure at roof level. A detailed views assessment of the proposals confirms that this plant enclosure is not visible from any view from street level.
- 5.13 It is proposed that the retail unit will continue to be serviced on-street via Camden High Street as per the existing servicing arrangements. The hotel will be serviced off-street from Signmaker's Yard.
- 5.14 Specifically, the proposals provide the following benefits:
 - Improvement and regeneration of the character and appearance of this part of Camden High Street;
 - Provision of 3 much needed affordable homes directly in line with Camden's housing need;
 - It will support the wider economic function of Camden and London as a whole, and its World City role, by providing additional visitor accommodation.

This will support London's wider economic function as a tourist and business destination;

- The scheme will assist in increasing the affordable hotel accommodation in the area by 80 hotel rooms;
- Provision of up to 35 new jobs directly associated with the hotel. These jobs are particularly beneficial to the local area since the hospitality sector provides job opportunities to a wide range of people with different levels of education, skill sets and work experience;
- The proposed development would support further employment through supply chain impacts and expenditure of both hotel guests and workers;
- Job opportunities will also be created by the contractor during the construction phase of the development;
- Economic benefits of guest expenditure will be generated within the local area and across London, external to the hotel;
- Provision of new and improved active uses at ground floor level to reactivate the Delancey Street 'secondary' frontage and significantly improve the appearance of the Camden High Street 'primary' frontage;
- High quality and attractive design, embracing the principles of sustainable design and construction;
- Better building energy use through installation of modern and efficient facilities and systems;
- The proposals make significantly more efficient use of a site in a highly sustainable location;
- Improvement to the surrounding public realm through the widening of the Delancey Street footway; and
- Creation of a safe and secure environment for existing and future residents, employees and visitors.

5.15 The proposed redevelopment allows the site to substantially enhance the character and local economy of Camden. The intention is that the proposal will act as a catalyst for further improvements to Camden High Street.

6 Planning Policy Framework

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 6.2 Planning policy operates at national, regional and local levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) in February 2019. The statutory development plan for the site comprises, at a regional level, the London Plan (Consolidated with Alterations since 2011) (March 2016), and at the local level, the Camden Local Plan (July 2017).

National Guidance – The National Planning Policy Framework (NPPF), February 2019

- 6.3 The NPPF sets out the Government's economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice (contained within PPG and PPS). Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.4 The document also sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Planning Practice Guidance (PPG) (March 2014)

- 6.5 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner. With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

Regional Planning Policy – The London Plan (consolidated with alterations since 2011) (2016)

- 6.6 The London Plan is the overall strategic plan for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas and forms part of the Statutory Development Plan.
- 6.7 In March 2016 the Mayor published Minor Alterations to the London Plan (MALPs) to align the London Plan with the national housing standards as set out in the Housing Standards Policy Transitional Statement and national car parking.
- 6.8 The following GLA Supplementary Planning Guidance documents are also material considerations:
- Affordable Housing and Viability (August 2017);
 - Housing (March 2016);
 - Town Centres (July 2014);
 - Accessible London: Achieving an Inclusive Environment (October 2014);
 - Shaping Neighbourhoods: Character and Context (June 2014);
 - Sustainable Design and Construction (April 2014); and
 - The Control of Dust and Emissions during Construction and Demolition (July 2014).

Local Planning Policy – Camden Local Plan (2017)

- 6.9 Camden Local Plan was adopted by London Borough of Camden on 3 July 2017. This replaced the Council's Core Strategy and Development Policies Document.
- 6.10 The following Camden Planning Guidance documents are considered to be of relevance in terms of this application:
- CPG Housing (Interim);
 - CPG 2 Housing May 2016 (updated March 2019);
 - CPG Amenity

- CPG Design;
- CPG Basements;
- CPG Air Quality
- CPG Developer Contributions
- CPG Employment Sites and Business Premises; and
- CPG Town Centres.

Emerging Policy

6.11 The draft new London Plan (2018) was published in November 2017. The Examination in Public has been taking place between January and May 2019. As outlined within the Clarion Housing Group v Royal Borough of Kensington Chelsea Appeal Decision dated 18 December 2018, for the proposed redevelopment of the land at William Sutton Estate, Cale Street, London, SW3 3QR (Appeal Reference: APP/K5600/W/17/3177810), the Secretary of State has confirmed that “the London Plan has some way to go before it can be considered close to adoption and as such agrees with the inspector and the parties that it can be afforded only very limited weight.”

7 Land Use

- 7.1 Sections 7 to 13 of this statement examine the planning considerations of relevance to this scheme. Each section sets out the relevant adopted planning policies and other material considerations before assessing each of the key planning considerations in turn. This first section looks at land use.

Retail – Policy

- 7.2 Town centres provide a competitive choice of goods and services accessible to all Londoners. Together with Neighbourhood Centres, Town Centres provide a sense of place and identity within the capital. The government recognises the importance of ensuring the vitality of town centres is protected and enhanced. Paragraph 85 of the NPPF states that “planning decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaption”.
- 7.3 In pursuance of this policy aspiration planning policies should allow Town Centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries.
- 7.4 London Plan Policy 2.15 advises that outside of the Central Activities Zone (CAZ) Town Centres should be the main focus of commercial development and intensification.
- 7.5 Policy 2.15 advises that development proposals within Town Centres should aim to:
- sustain and enhance the vitality and viability of the centre;
 - accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations;
 - support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services;
 - be in scale with the centre;
 - promote access by public transport, walking and cycling;
 - promote safety, security and ‘lifetime neighbourhoods’;

- contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure; and
 - Reduce delivery, servicing and road users' conflict.
- 7.6 London Plan Policy 4.7 seeks to support a strong approach to assessing need and bringing forward capacity for retail development in Town Centres. The scale of retail should be related to the size, role and function of a Town Centre and its catchment.
- 7.7 In addition, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.
- 7.8 Camden Local Plan Policy TC1 advises that the Council will focus new shopping and related uses in Camden's designated areas and existing centres, having regard to the level of capacity available in these locations.
- 7.9 Camden Local Plan Policy TC2 states that the Council will "promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors".
- 7.10 In pursuance of this, Camden Local Plan Policy TC2 states that the Council will protect and enhance the role and unique character of Camden's centres by inter alia providing and maintaining a range of shops, including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice.
- 7.11 TC2 (f) states that the Council will protect primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre.
- 7.12 Appendix 4 of the Camden Local Plan sets out the Council's aspirations for the mix of Town Centre uses within the borough. In order to ensure the vitality and viability of the Town Centre a minimum of 75% Class A1 retail use frontage should be provided along primary frontages within Camden Town Centre (south) and 50% along secondary frontages.
- 7.13 The objective of Camden Local Plan Policy TC4 is to ensure that the development of Town Centre uses (inclusive of both retail (A1) and hotel (C1) uses) does not cause harm to the character, function, vitality and viability of the centre or the amenity of

neighbours. In assessing development proposals for new Town Centre uses, the Council will consider, inter alia, the effect of development on shopping provision and the character of the centre in which it is located; the Council's expectations for the mix and balance of uses within frontages; impacts on small and independent shops and markets; the impact of the development on nearby residential uses and amenity; parking, stopping and servicing and the effect of the development on ease of movement on the footpath; noise and vibration generated either inside or outside of the site; fumes likely to be generated and the potential for effective and unobtrusive ventilation; and the potential for antisocial behaviour.

- 7.14 Camden Local Plan policies should be read in conjunction with the Camden Planning Guidance (CPG) 'Town Centres and Retail (2018)' which provides detailed centre specific guidance on how the Council will implement policies for Town Centres. It advises that the secondary frontages within Camden Town Centre have a varied character and range of uses. With regard to Town Centres outside of central London, the key message set out within the CPG is that the Council "will protect the shopping function of [its] Town Centres by ensuring there [are] a high proportion of premises in retail use".
- 7.15 Camden Local Plan Policy TC5 advises that the Council will promote the provision of small shop premises suitable for small and independent businesses. In pursuance of this Camden will encourage the occupation of shops by independent businesses and the provision of affordable premises.

Retail – Assessment

- 7.16 The site currently comprises two levels (plus a small basement level) of Class A1 retail floorspace, totalling approx. 1,266sqm (GIA), 609sqm of which is provided at ground floor level. The proposed development comprises a retail unit at ground floor level only, comprising approx. 156sqm (GIA).
- 7.17 Although there is a loss in the amount of retail floorspace proposed on site, crucially, the primary retail frontage is retained and protected. As such, the scheme proposals are considered to be in line with Policy TC2, which seeks to protect the primary retail frontage.

- 7.18 Retaining the primary frontage and the provision of a retail unit on this site will ensure that the retail function and character of this part of the high street and Camden's Town Centre is maintained, in line with Policy TC2. Indeed, the removal of the current low quality shopfront and its replacement with a much higher quality shopfront will be more attractive to retail tenants and will improve the retail character of this area. Furthermore, the proposed ground floor of the new building will provide new active frontage on Delancey Street, which is designated as a secondary frontage but currently comprises a long, blank façade. These interventions will offer a significant improvement in public realm terms.
- 7.19 The provision of a shop premises suitable for a small and/or independent retailers is also directly in line with Policy TC5.
- 7.20 Notwithstanding that the proposals are considered to comply with planning policy, we felt it would be prudent to assess the current retail demand in the area. As such, a Retail Market Report, prepared by Lewis Craig, accompanies this application submission and is set out at Appendix B of this Statement. The Report assesses: the current retail demand in the area for first floor retail units; units of the existing size over two floors; ground floor units of the existing size; and ground floor units of the proposed size.
- 7.21 In summary, the Report concludes that the demand for secondary retail space at first floor level is on the decline, with demand for these types of spaces (and basement space) coming from alternative uses such as health, leisure, beauty and flexible-style offices. Similarly, retailer's space needs are continuing to reduce to provide the most cost-effective usable stores in Central London, where occupancy costs tend to be higher. An option where the current ground floor unit is divided from the first floor and the ground floor is split into two units is not considered to be a viable option as units of this nature (being long and narrow) would be undesirable to retailers. Overall, the strongest retail demand is considered to be for a unit offering circa 139sqm to 185sqm. It is also noted that the current proposed unit would benefit from the frontage on Camden High Street and the return frontage on Delancey Street. Full details of the marketing assessment are set out in the accompanying Report.
- 7.22 Given the above, the proposed retail floorspace at the site is considered to provide the optimum purpose built unit to meet the demand of modern retailers in this location.

and to be directly in line with Local Plan Policies TC2, TC4 and TC5. The proposed unit is considered to be the most desirable and viable for potential retailer's in today's retail environment.

Hotel – Policy

- 7.23 Camden Local Plan Policy E3 advises that the Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. The Council will expect new, large-scale tourism development and visitor accommodation (generally considered to be developments that provide additional floorspace of 1,000sqm or more) to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn, while allowing smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage.
- 7.24 Policy E3 further advises that all tourism development and visitor accommodation must, of relevance:
- 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.
- 7.25 Supporting paragraph 5.55 of Policy E3 advises that Camden has a wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town's markets and Covent Garden; venues such as the Roundhouse, Koko and the Forum; Regent's Canal; and historic places, such as Hampstead and Bloomsbury. These attract high numbers of visitors throughout the

year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole.

- 7.26 Furthermore, paragraph 5.56 states that visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London. The London Plan Policy 4.5 sets a target of achieving 40,000 net additional hotel rooms by 2036 across London. 37% of the expected increase in the number of rooms across Greater London is expected to be met in Westminster, City of London and Camden. Policy E3 therefore aims to maintain and encourage a range of attractions and accommodation in the borough for Camden's visitors.

Hotel – Assessment

- 7.27 The proposed development would provide hotel accommodation of 80 rooms (Use Class C1). The hotel use is distributed at basement, part ground and first to fourth floor levels.
- 7.28 The site is considered to be an entirely appropriate location under the London Plan. The London Plan seeks to support London's visitor economy and stimulate its growth, directing smaller scale hotels to areas with good public transport access. The site has a PTAL rating of 6b and is located approximately 240 metres to the south of Camden Town Underground Station which is served by both branches of the Northern Line. Camden Road Rail Station is located approximately 517m to the north-east of the site, Euston Station is located approximately 1km to the south and King's Cross is located approximately 1.2km to the south-east. There are also a number of bus routes surrounding the site connecting it to the rest of Camden and wider London.
- 7.29 While it is acknowledged that the proposed hotel would fall within 'large-scale' development as set out within the Local Plan, Policy E3 does not specifically preclude larger hotels from being located within Camden Town Centre. Indeed, the location of the proposed hotel is considered to be appropriate, in line with the criteria set out within Policy E3.

- 7.30 Paragraph 7.28 above sets out the excellent public transport links to the hotel, in line with part (f) of Policy E3.
- 7.31 In line with part (g) of Policy E3, a comprehensive assessment of the transport impacts of the proposed development has been undertaken, which concludes that coach and taxi activity would be insignificant and no dedicated facilities for these vehicles would be necessary. Full details of the transport impacts of the proposed development are set out in Section 7 of this Statement.
- 7.32 The proposed development will contribute to the range of hotels available within Central London, by establishing an additional hotel within the Hub by Premier Inn range, which offers a unique, high quality design and level of affordability to visitors.
- 7.33 There are a range of facilities, amenities, business destinations and leisure attractions within the immediate vicinity of the site, including Regents Park, ZSL London Zoo and Camden Market. In addition, the character of the surrounding area comprises a range of commercial, retail, leisure and residential uses, which the proposed hotel will complement. It is therefore considered that the proposed hotel will not harm the balance and mix of uses in the local area, or the local character, but rather will contribute to and complement the balance of uses and character, in line with part (h) of Policy E3.
- 7.34 The proposed hotel is not considered to have any detrimental impacts on the amenity of nearby residential properties, as set out in Sections 9 and 12 of this Statement. Furthermore, the proposals are not considered to harm services for the local community, or the environment (as set out in Section 10 of this Statement). The proposed hotel is therefore considered to comply with part (h) of Policy E3.
- 7.35 The proposals will not result in the loss of permanent residential accommodation, in line with part (i) of Policy E3. Indeed, the proposed hotel will result in the provision of three permanent social affordable residential units in this part of Camden.
- 7.36 With regard to the economic benefits, the proposed hotel will support the wider economic function of Camden and London by providing additional, affordable visitor

accommodation. This will support London's wider economic function as a tourist and business destination.

- 7.37 The scheme will result in the provision of 35 new jobs directly associated with the hotel. These jobs are particularly beneficial to the local area since the hospitality sector provides job opportunities to a wide range of people with different levels of education, skill sets and work experience.
- 7.38 The proposed development would support further employment through supply chain impacts and expenditure of both hotel guests and workers. It is considered that additional indirect jobs will also be created as a result of the development, alongside considerable economic spin off benefits to the local area and across London through guest expenditure. Job opportunities will also be created by the contractor during the construction phase of the development;
- 7.39 Overall, the provision of a hotel in this location is considered to be entirely acceptable in principle. The proposed development would add to the high quality visitor accommodation on offer within Camden, providing hotel accommodation for both business and tourist visitors whilst adding to the character of central London, benefiting the local economy and creating local employment.

Residential – Policy

- 7.40 Paragraph 59 of the NPPF (2018) states “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.
- 7.41 Paragraph 60 states “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure,

any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

- 7.42 In addition to this, paragraph 61 notes that “within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”.

- 7.43 Housing provision is a key priority of the London Plan (2016), and Policy 3.3 sets an annual housing target for the city of 42,000 net additional homes. Furthermore, this policy seeks to increase housing supply and states that “the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford”.

- 7.44 Table 3.1 of the London Plan subsequently sets out housing targets for each borough for the period 2015-2025. The annual average housing supply monitoring target for Camden is 889 units. Part E of Policy 3.3 outlines that this development capacity should be realised through the “intensification of brownfield land; town centre renewal; opportunity and intensification areas and growth corridors; and mixed use redevelopment, especially of surplus commercial capacity”.

- 7.45 London Plan Policy 3.8 relates to housing choice. It states that “Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.” The policy states that “taking account of the housing requirements at all levels, Boroughs should ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these”.

- 7.46 Camden Local Plan Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has been increased to

16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.

7.47 Camden Local Plan Policy TC2 supports the development of housing within centres and Central London including above and below shops where this does not prejudice town centre function.

7.48 As set out above, Policy H2 of Camden's Local Plan seeks to maximise the supply of self-contained homes as part of a mix of uses and will seek residential accommodation in development proposals where the total gross floorspace increases by more than 200sqm (GIA) and will require 50% of all additional floorspace to be self-contained housing.

7.49 Where housing is required as part of a mix of uses, Camden will seek the housing to be provided on-site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would be more appropriately be provided off-site, Camden will seek provision of housing on an alternative site nearby, or exceptionally a Payment-In-Lieu (PIL).

7.50 In considering whether affordable housing provision should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate, Policy H4 advises that the Council will also take into account:

j. the character of the development, the site and the area;

k. site size and any constraints on developing the site for a mix of housing including market and affordable housing, and the particular types of affordable provision sought;n. the impact of the mix of housing types sought on the efficiency and overall quantum of development.

Residential – Assessment

7.51 Having undertaken a detailed design exercise with regard to the provision of housing on-site, it was concluded that the policy compliant amount of housing cannot be practically delivered following the criteria in Policy H2.

- 7.52 Providing the total 9 residential units required under Policy H2 would result in a scale and massing on site that would be harmful to the character and appearance of the Camden Town Conservation area and the surrounding area.
- 7.53 The optimal solution, as agreed with Camden Council at pre-application stage, is for all of the residential floorspace to be delivered as social rented accommodation, affordable housing being the priority within the Borough. Accordingly, a total of 3 social rented housing units are provided, which exceeds the policy compliant level of affordable housing and is supported by planning policy at all levels.

Affordable Housing – Policy

- 7.54 Paragraph 20 of the NPPF sets out the strategic policies and identifies that sufficient provision should be made for housing, including affordable housing. In this context, Paragraph 61 states that housing should be provided for different groups in the community including those who require affordable housing. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless specific criteria can be met.
- 7.55 London Plan Policy 3.11 states that across London the target is to provide on average 17,000 more affordable homes per year over the plan period. 60% should be for social rent/affordable rent and 40% for intermediate rent or sale.
- 7.56 London Plan Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.
- 7.57 When deciding the maximum reasonable amount of affordable housing, the following should be taken into account:
- Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11;
 - Affordable housing targets adopted in line with Policy 3.11;
 - The need to encourage rather than restrain residential development;
 - The need to promote mixed and balanced communities (Policy 3.9);
 - The size and type of affordable housing needed in particular locations; and

- The specific circumstances of individual sites.

- 7.58 Policy 3.13 of the London Plan states that affordable housing will be required on sites which have the opportunity to provide 10 or more homes on-site, applying density guidance set out in Policy 3.4 of the London Plan.
- 7.59 Camden Local Plan Policy H4 states that the Council will aim to maximise the supply of affordable housing and exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31 and will aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 7.60 Policy H4 identifies that the Council expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 7.61 Policy H4 goes on to state that for developments with a capacity for fewer than 25 additional homes, a sliding scale target applies starting at 2% for one home and increasing by 2% for each home added to capacity. Part (g) of the policy states that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.
- 7.62 Policy H4 sets out that the guideline mix of affordable housing types is 60% social rented housing and 40% intermediate housing.

Affordable Housing – Assessment

- 7.63 The calculation for affordable housing is based upon the self-contained housing requirement of Policy H2 of Camden's Local Plan. In line with Policy H2, the self-contained housing requirement would be 787sqm (GIA). Under Policy H4, and the sliding scale (as the capacity is for less than 25 homes) this would generate an affordable housing contribution of 126sqm (GIA) or 16%.
- 7.64 In line with Policy H4 of Camden's Local Plan, all of the housing forming part of the Proposed Development is affordable housing. The scheme provides 341sqm (GIA) of affordable housing (Class C3), within a dedicated building at the western end of the

site. The policy compliant affordable housing floorspace requirement is 126sqm. Accordingly, the proposed development provides over 2.5 times the policy required level of affordable housing floorspace on-site. This equates to 3 affordable housing units.

- 7.65 Whilst Policy H4 of Camden's Local Plan requires the affordable housing tenure split to be 60% social rented and 40% intermediate, the proposed development will provide 100% social rented. This has been agreed with the Council at pre-application stage and is in line with the Council's current housing priority for the provision of social affordable units.
- 7.66 The proposed quantum of affordable housing is in accordance with National, Regional and Local Planning Policy as it provides more than 100% of the required level of affordable housing on site and contributes towards the National, Regional and Local shortage in affordable housing generally.

Mixed Use – Policy

- 7.67 The NPPF encourages mixed use developments in order to promote social interaction and to encourage multiple benefits from land.
- 7.68 Policy 4.3 of the London Plan states that for areas outside of the Central Activities Zone (CAZ) and the Isle of Dogs Opportunity Area, mixed use redevelopment should support consolidation and enhancements to the quality of the remaining office stock in the types of strategically specified locations identified in paragraph 4.12. Paragraph 4.12 identifies viable locations as, amongst other things, being town centre based office quarters and locally oriented town centre based office provision, which can be consolidated effectively to meet local needs, or where necessary, changed to other uses.
- 7.69 A key aim of Camden's Local Plan, particularly Policy H1, is to maximise housing supply within the Borough. In order to achieve this, Policy H2 of the Local Plan requires that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses, across the Borough.

7.70 Within Camden Town Centre, where development involves additional floorspace of more than 200sqm (GIA), Policy H2 requires 50% of all additional floorspace to be provided as self-contained housing, taking into account a number of considerations as follows:

- a) the character of the development, the site and the area;
- b) site size, and any constraints on developing the site for a mix of uses;
- c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- 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
- e) whether the development is publicly funded or serves a public purpose.

7.71 Where housing is required as part of a mix of uses, Camden will seek the housing to be provided on-site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would be more appropriately be provided off-site, Camden will seek provision of housing on an alternative site nearby, or exceptionally a Payment-In-Lieu (PIL).

7.72 Policy H2 of the Local Plan sets out that in considering whether housing should be provided on site, the most appropriate mix of housing and other uses, the Council will, of relevance, take into account:

- f) the need to add to community safety by providing an active street frontage and natural surveillance;
- g) the extent of any additional floorspace needed for an existing user;
- h) the impact of a mix of uses on the efficiency and overall quantum of development;
- 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
- j) whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Mixed Use – Assessment

- 7.73 It is proposed to create a genuine mixed use development, comprising of hotel, retail and residential uses. The proposed development increases the gross internal floorspace on site by 1,574sqm through the demolition and redevelopment of the existing building. The scheme therefore triggers a requirement to provide housing under Policy H2 of Camden's Local Plan.
- 7.74 Policy H2 requires the provision of up to 50% of the total additional floorspace to be provided as housing. If housing cannot be achieved on site, a contribution to off-site housing may be considered. In exceptional circumstances the Council may accept a PIL. In line with Policy H2, the self-contained housing requirement would be 787sqm (GIA), under Policy H4, this would generate an affordable housing contribution of 126sqm (GIA) or 16%. The proposed development is for 341sqm (GIA) of housing (all of which is proposed as affordable) to be provided on site.
- 7.75 From the outset, the project team examined the potential for maximising the quantum of housing that could be provided on-site in accordance with Policy H2. However, following this exercise, it was considered that the policy compliant amount of self-contained housing could not practically be delivered on-site having regard to Policy H2 criteria parts (h), (i) and (j), set out below. Please note that (f) and (g) have not been considered further as they are not relevant to this scheme.

Criterion H (i.e. the impact of a mix of uses on the efficiency and overall quantum of development)

- 7.76 Townscape and heritage considerations have directly informed the height and massing of the proposed building. It is considered that the proposed building height and massing is entirely appropriate in the context of these constraints, while also representing what is considered to be the maximum building envelope.
- 7.77 If the proposals were to provide the policy compliant level of self-contained housing on-site within the currently proposed envelope, the number of hotel rooms achievable on site would fall below the critical number required to ensure that the hotel has the

ability to make a sufficient level of return and contribution to central overheads, and the scheme could not be delivered.

- 7.78 The proposed quantum and mix of uses is considered to be the maximum the site can deliver whilst also being the most appropriate in terms of making the most efficient use of the site and in achieving the competing policy objectives.

Criterion 1 (i.e. 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)

- 7.79 It is important to note that, as set out above, the amount of residential floorspace being delivered on site has been primarily design led. However, although the quantum of proposed residential floorspace is not, in itself, viability led, the scheme is considered to be unviable if less than 80 hotel rooms can be provided on site. This is because a minimum number of rooms are required to generate sufficient revenue to achieve the minimum viable return and the fixed overhead costs associated with a hotel of fewer than 80 rooms would become disproportionate to the achievable room rate in this location. As such, there would be insufficient room revenue required to break even in a hotel smaller than this.
- 7.80 The fixed costs involved relate to fixtures, fittings and equipment, marketing and promotional support, central head office costs contribution and pre-opening set up costs together with working capital to establish and run the hotel prior to revenue streams commencing. Once established, there are base labour costs required to run the hotel irrespective of the room count.
- 7.81 As such, should the number of proposed hotel rooms need to be reduced in order to provide additional residential floorspace on site, the scheme would not be delivered. Further details relating to the requirements for a hotel of the proposed size are set out in the accompanying letter prepared by Whitbread attached to this Statement at Appendix C.

Criterion J (i.e. whether an alternative approach could better meet the objectives of this policy and the Local Plan)

- 7.82 In terms of other planning objectives, there is a need for new employment floorspace within Camden. The proposed scheme would generate up to 35 jobs directly associated with the hotel, as well as additional indirect jobs and considerable economic spin off benefits to the local area.
- 7.83 In addition, 341sqm (GIA) of on-site affordable housing, delivering 3 social affordable housing units, is proposed, which equates to over 2.5 times the affordable housing contribution required.
- 7.84 The scheme proposals are also considered to be in line with design policies and considerations, as set out in Section 8 of this Statement.
- 7.85 The proposed mixed-use development is considered to accord with the objectives of the NPPF, the London Plan and more specifically Camden's Local Plan mixed use policy requirements.

8 Design, Heritage and Visual Impact

- 8.1 This section considers the design, heritage and visual impact matters at the site. It should be read alongside the DAS prepared by Morris and Co and the Heritage, Townscape and Visual Impact Assessment (HTVIA) prepared by KM Heritage.

Design – Policy

- 8.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 8.3 Paragraph 124 of the NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 8.4 Paragraph 127 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness. While achieving this development should optimise the potential use of the site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 8.5 Paragraph 130 requires development design to take into account the opportunities for improving the character and quality of an area and the way it functions. Paragraph 131 confirms that weight should be given to outstanding or innovative designs which promote sustainability or help to raise the design generally in an area, as long as the fit with the overall form and layout of their surroundings.
- 8.6 Paragraph 4 of the PPG on Design, states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that “planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about

incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits".

8.7 Paragraph 15 of the PPG on Design states that that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:

- be functional;
- support mixed uses and tenures;
- include successful public spaces;
- be adaptable and resilient;
- have a distinctive character;
- be attractive; and
- encourage ease of movement.

8.8 London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport. It states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.

8.9 London Plan Policy 7.4 states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing a character for the future function of the area.

8.10 In addition, buildings should provide a high quality design response that inter alia, has regard to the pattern and grain of the existing spaces and streets in terms of orientation, scale, proportion and mass. Buildings should contribute to a positive relationship between the urban structure and local natural landscape features, including the underlying landform and topography of an area. Buildings should be human in scale and be informed by the surrounding historic environment.

- 8.11 Policy 7.5 of the London Plan seeks to ensure amongst other objectives, that London's public spaces should be secure, accessible, easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces.
- 8.12 London Plan Policy 7.6 sets out a series of overarching design principles for development in London, seeking to incorporate the highest quality materials and design appropriate to its context. The policy seeks building and structures to be inter alia:
- of the highest architectural quality;
 - of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
 - comprise details and materials that complement;
 - incorporate best practice in resource management and climate change mitigation; and
 - meet the principles of inclusive design.
- 8.13 At the local level Camden Local Plan Policy D1 reflects these objectives and requires development to respect the local context and character and incorporate high quality design, materials and construction. Development should integrate well with the surrounding streets and open space, improve movement through the site and wider area and where possible offer direct, accessible and easily recognisable routes. Further to this development should minimise opportunities for crime and antisocial behaviour.
- 8.14 Camden Local Plan Policy D1 (k) advises that development should incorporate high quality landscape design (including public art, where appropriate) and maximise opportunities for greening.
- 8.15 Paragraph 7.22 within the Camden Local Plan advises that Camden will expect development schemes to provide a high standard of landscape design and encourages the development of green and brown roofs and walls. The design of new hard and soft landscaping should be contextual and consider access requirements.

- 8.16 Camden Local Plan Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high quality safe road crossings where needed and seating.

Design – Assessment

- 8.17 This section provides an assessment of design matters in the context of relevant policies. A comprehensive commentary regarding the design approach in respect of the proposed development is provided within the Design and Access Statement prepared by Morris and Co.
- 8.18 The design of the proposals has been carefully considered throughout the pre-application stage and is the result of an iterative process with input from Camden design officers, and Camden's Design Review Panel (both a full review and a subsequent Chair's Review), consultation with local stakeholders and residents, as well as a full analysis of the variety of architectural styles and massing of buildings along Camden High Street and the surrounding area.
- 8.19 The site offers a significant development opportunity. Whilst the existing building fits within the architectural styles that make up the High Street, due to its relatively low height, it is dominated by its entirely modern and poor quality shop front facing Camden High Street, that extrudes from the existing building line and sits as an anomaly within the street context, and a long blank façade on Delancey Street. Furthermore, as discussed in Section 7 above, the existing building is considered to be unsuitable and undesirable for modern retail occupiers.
- 8.20 The existing building on site provides an opportunity to optimise the use of this corner site through additional height, particularly towards Camden High Street where the taller (5 storey) mass would be located, with the mass stepping down along Delancey Street (to 4 storeys) and with the top floor also being set back.
- 8.21 The proposed scale and massing has been articulated in response to the two different street expressions that converge at the site. Delancey Street, whilst still considered 'urban' on the stretch up to Arlington Road, transforms into more of a residential area. The corner junction fronting Camden High Street, in contrast, is a far more urban

context, where several larger landmark buildings, including Bowman Brothers Department Store and the Lloyds Bank are located. The mass steps down and relates to the more intimate environment and the finer, more domestic grain of Arlington Road. The mass has been further articulated through chamfering; a response to the eclectic identity of Camden composed of a rich variety of roofscapes. The proposed chamfering of the fourth and fifth storey reflects architectural styles within the area, while also reducing the mass along Delancey Street, appealing to the more sensitive residential area in that direction and responding to the lower height of the neighbouring Santander building on the high street elevation (121- 123 Camden High Street).

- 8.22 The massing evolved with these site-wide considerations in mind and with the intention that the High street area of mass plays a role in improving the legibility and reading of the high street. The corner location of the site offers a particular opportunity to enhance the public realm and maximise the retail frontage, activating the streetscene on both Camden High Street and Delancey Street. This would complement the existing context on the opposite site of the street, where The Blues Kitchen building has a frontage onto Camden High Street that continues to wrap around onto Delancey Street, enhancing the character and appearance of the area.
- 8.23 The proposal intends to recess the building to realign with the neighbouring properties. Furthermore, the scheme proposals comprise a chamfered corner at ground floor level (with a squared corner on the upper levels). The facade is cantilevered over the retail entrance to create an indentation at the south-east corner of the building. The chamfered corner references the historical treatment of corner buildings along the High street. The intention of this chamfered corner is to improve the public realm and act as a mechanism to facilitate movement across the busy junction on which the site is located, and to begin to encourage people down Delancey Street.
- 8.24 The resultant space also allows for a point of visual interest at the most public and critical interface with the surrounding streetscape, as well as resulting in a dynamic internal entrance. The profile of the chamfered facade is mirrored in the entrance to the hotel on Delancey Street, where the same design is used to not only provide a visually interesting entrance to the hotel, but also to aid pedestrians using the

pavement, with the set-back facilitating a space for hotel residents to dwell and wait, whilst improving pedestrian flow along Delancey Street.

- 8.25 The proposals also seek to replace the existing trees along Delancey Street with better quality and larger crowned trees.

- 8.26 The proposed massing and architectural approach has been developed following a full analysis of the variety of architectural styles and massing of buildings along Camden High Street, alongside, extensive pre-application discussions with the Council and consultation with local stakeholders and residents.

- 8.27 The choice of materials and detailing have been similarly chosen through a careful understanding of the different material palettes that make up the buildings of the area. The proposed materials have been used in a way that complements the neighbouring properties.

- 8.28 The proposed building façade reflects the key characteristics of buildings along Camden High Street and Delancey Street, including: an increased ceiling height and the use of different materiality on the base of buildings to reflect a different use; a strong grid informed by window reveals; a building crown that is distinguished through a subtle different expression of the top floor; brick details capturing the variety of the high street typologies; and the transition and gradual reduction of detailing along Delancey Street.

- 8.29 Three key materials have been identified throughout the local area, which have informed the façade development including: brick; stucco, render and concrete; and metalwork.

- 8.30 Brick is the predominant building material in the Camden Conservation Area and a natural choice for the proposed development. It is the intention that the proposal will complement the impressive Victorian and Edwardian red brick parades which stand as prominent and iconic buildings along Camden High Street. The impressive use of brick detailing acts as the main precedent for the proposal's façade articulation.

- 8.31 The metal 'zig-zag' window spandrels provide both an ornamental interpretation of the detailing used on the Victorian and Edwardian red brick parades and a practical

means for ventilating the hotel rooms. A sage green hue is adopted to provide a vibrant contrast to the red brick, taking reference from the tiles used above the windows of nearby Bowman Brothers Department Store, built in 1893.

- 8.32 Pre-cast concrete used on the ground floor and parapets draws reference from the heavy use of Stucco on the ground floors of the nearby Georgian parades and helps to define and celebrate the High street.
- 8.33 The proposals have been designed to reflect each of the different uses, while still ensuring that each element complements each other and the overall design approach for the building. This is evidenced through the use of red brick throughout, however, with the residential element excluding the use of chamfering. Furthermore, while the commercial elements comprise concrete detailing at ground floor level, the residential element also contains concrete at ground floor level, but in a sage green colour to reflect the use of this colour throughout the building in window details and balcony railings. Full details of the design of each different use is set out within the accompanying Design and Access Statement.
- 8.34 Overall the proposed scale and massing of the scheme relates well to the immediate and wider townscape. The materiality is considered to enhance this part of the Camden Town Conservation Area, while the setting back of the building line is considered a significant improvement and benefit to the public realm. The proposed development is sited and designed to respect its townscape and visual context.

Heritage – Policy

- 8.35 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 8.36 Under paragraph 189 of the NPPF in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In undertaking this requirement the level of detail should be proportionate to the assets' importance and

no more than is sufficient to understand the potential impact of the proposal on their significance.

- 8.37 Further to this, paragraph 190 states that “local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this in to account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”.
- 8.38 Paragraph 196 of the NPPF states that where a proposed development will lead to less than substantial harm to a designated heritage asset, this this harm shall be weighed against the public benefits of the proposals.
- 8.39 Paragraph 197 of the NPPF states that when determining applications a balanced judgment should be made weighing the scale of any harm or loss against the significance of a non-designated heritage asset.
- 8.40 Paragraph 198 introduces the requirement that ‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 8.41 Paragraph 199 confirms that where a heritage asset is to be lost, the developer will be required to ‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.
- 8.42 Further to this paragraph 200 of states that local planning authorities should look for opportunities within the setting of heritage assets to enhance or better reveal their significance. In pursuance of this paragraph 202 advises that in determining proposals for enabling development local planning authorities should consider its potential to secure the future conservation of a heritage asset.

8.43 Policy 7.8 of the London Plan states that “development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology...Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail”.

8.44 At the local level, Camden Local Plan Policy D2 states that “the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas”.

8.45 In relation to designated heritage assets generally the policy says:

‘The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.’

8.46 Further to this, the text at paragraph 7.46, supporting Policy D2, states that in order to preserve or enhance important elements of local character, the factors that create that character must be considered. In determining applications for development in conservation areas the London Borough of Camden will seek to manage change in a way that retains the distinctive character of the area and expect new development to contribute positively to this process. To support this process the London Borough of Camden has prepared conservation area appraisals for each conservation area.

8.47 Camden Local Plan Policy D2 states that designated heritage assets include conservation areas and listed buildings and the Council will not permit the loss of or

substantial harm to a designated heritage asset, including conservation areas and Listed Buildings unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

- 8.48 Policy D2 of the Local Plan goes on to state that conservation areas are designated heritage assets and that in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals, and management strategies when assessing applications within conservation areas. The Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. Similarly, the Council will resist development that would cause harm to significance of a listed building through an effect on its setting.
- 8.49 In relation to other heritage assets and non-designated heritage assets including those on and off the local list, the policy states that the 'effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.'

Assessment

- 8.50 A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by KM Heritage and submitted as part of the Application. Please refer to this for further information regarding heritage matters.
- 8.51 The site sits within the Camden Town Conservation Area, which was first designated by Camden Council in November 1986 and extended in 1997. The Camden Town Conservation Area Appraisal and Management Strategy was adopted on 4 October 2007. The site is categorised as being a 'positive building' on the Conservation Area map. The Grade II listed former Electricity Substation sits to the rear of the site on Arlington Road.
- 8.52 The existing building is not the original one constructed on the site but was built in the inter-war period for Woolworths. Whilst it fits the character as part of the eclectic mix of architectural styles that makes up the High Street, in reality, from street level, due to its relatively low height, it is dominated by its entirely modern and poor quality

shopfront. Any detailing of the building, where it still exists, is typical rather than special for its time and significantly does not continue for the length of its return along Delancey Street, creating the long blank and utilitarian return along that street. This can certainly not be regarded as positively contributing the conservation area.

- 8.53 KM Heritage conclude that the contribution that the existing building makes to the overall character and appearance of the conservation area is as a building that typifies the eclectic mix of styles and ages, rather than specifically for any special architectural or historical merits. Any architectural qualities that the upper floor might have is largely undermined by the poor quality of the ground floor shop unit, which now dominates and overwhelms the rest of the building.

- 8.54 In assessing the development proposals, the Heritage Assessment concludes that the proposed development will make a positive contribution to the character and appearance of the conservation area.

- 8.55 The existing building on the site appears disproportionately low in comparison to the surrounding buildings and this has the consequence of exposing the large unattractive flank elevation of Bedford House. The proposal will solve this negative consequence with a building that still sits comfortably within the scale and proportions of the surrounding townscape and will provide a ground floor that is a positive enhancement to both Camden High Street and the vibrancy of Delancey Street.

- 8.56 The architecture is designed to enhance all elevations, and the active ground floor and chamfered upper floors along Delancey Street will provide a building that genuinely contributes and enhances the character and appearance of the conservation area. The proposal will have no detrimental impact on the nearby listed building. The proposed development therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and planning policy at all levels.

- 8.57 With regards to Paragraph 196 of the NPPF, whilst the existing building has been identified as making a positive contribution to the character and appearance of the conservation area, KM Heritage conclude that that contribution is limited to being an example (amongst many) of the eclectic styles and buildings along the High Street and that any contribution is much reduced by the poor quality of the shop front and

the utilitarian and blank side elevation to Delancey Street, both of which are considered to make a negative contribution to the conservation area.

- 8.58 As such, the replacement of the existing building will not cause harm to the character and appearance of the conservation area, particularly if replaced with a building of considerably higher quality, which the current proposal offers. The proposed scheme enhances the character and appearance of the conservation area through its approach to addressing the streets at ground floor as well as the better articulation of all of the elevations at the upper floors. These should be regarded as considerable benefits to both the public and the conservation area.
- 8.59 The proposal provides the added public benefits of affordable residential accommodation and the sustainable optimum viable use of the site as well as improvements to the public realm on Delancey Street. The proposals therefore comply with Paragraph 196 of the NPPF.
- 8.60 The proposals clearly provide a high quality design that respects local context and character and preserves and enhances the historic environment and heritage assets. It will also be sustainable in design and construction, in line with Camden Local Plan Policy D1.
- 8.61 Should it be considered during the assessment of the planning application that the loss of the existing building will cause 'less than substantial harm' to the conservation area, this is more than outweighed by the quality of the proposed replacement building, the improvements to the shopfront on Camden High Street and the activation of Delancey Street (including public realm improvements) as well as the provision of affordable residential units and hotel accommodation in Camden.
- 8.62 In conclusion, the proposals will positively preserve and enhance the character and appearance of the conservation area and the setting of nearby listed buildings and thus comply with national legislation and national and local planning policy with regards the historic built environment.

Views – Policy

- 8.63 London Plan Policy 7.11 designates a number of strategic views which are described in more detail in the London View Management Framework (LVMF) SPG. The LVMF SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London, and explains how 26 views designated by the Mayor and listed in the London Plan are to be managed.
- 8.64 Policy D1 of Camden’s Local Plan states that the Council will seek to secure high quality design in development and that they will require that development preserve strategic and local views.

Views – Assessment

- 8.65 The site does not fall within any views within the LVMF. However, as referenced above, a Heritage, Townscape, and Visual Impact Assessment (HTVIA) has been prepared by KM Heritage and submitted as part of this Application.
- 8.66 A full analysis of the proposed development within local views has been undertaken as part of the pre-application process and the key views have been tested and reported within the accompanying HTVIA.
- 8.67 Due to the prominent location on the junction of Camden High Street and Delancey Street, views to the site are plentiful. Key views are concentrated from Camden Town Underground and through to Mornington Crescent Underground. The site can also be viewed from Pratt Street, Arlington Road and along Delancey Street.
- 8.68 The 7 views assessed, as agreed with officers, as part of the HTVIA demonstrate that, where visible, the proposed development would sit entirely comfortably within the wider context and townscape. Its proportions and scale would not be out of step with the rest of Camden High Street or Delancey Street and the step backs will provide some variety that further typifies each street and creates comfortable connections with neighbouring and surrounding buildings.

- 8.69 The HTVIA concludes that the proposal will not have a detrimental impact on the character of the conservation area but will preserve and enhance it in a positive way.

9 Residential Design

- 9.1 This section considers the technical design of the proposed residential units, including unit mix, unit sizes, private amenity space, accessibility, and aspect and privacy. This section does not consider the external design of the building which is considered within Section 8.

Unit Mix – Policy

- 9.2 NPPF paragraph 61 notes that “within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”.
- 9.3 The objective of London Plan Policy 3.8 is inter alia to ensure that development delivers an appropriate mix of house sizes and tenures to meet identified needs within London. In pursuance of this policy objective new development should “offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these”.
- 9.4 Further to this London Plan Policy 3.9 advises that “a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation”.
- 9.5 The Mayor’s Housing SPG sets out the need for different unit sizes in private, affordable or mixed residential schemes. The SPG only sets out strategic London wide requirements and does not set targets for individual sites. The SPG recognises that housing should be appropriate to context and constraints within a particular site and that the requirement for units of different sizes varies widely between local areas.
- 9.6 In considering the mix of uses and the appropriate contribution to the housing supply in Camden, the strategic aim of the Council is to ensure that a variety and mix of

housing is provided in the Borough to suit the widely differing social and economic needs of residents.

9.7 Policy H7 of Camden's Local Plan states that the Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. In order to do this the Council will ensure that all housing developments contribute to meeting the priorities set out in the Dwelling Sizes Priorities Table and include a mix of large and small homes. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.

9.8 At supporting paragraph 3.189 Camden's Dwelling Size Priorities for social-affordable rented housing are as follows:

1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Lower	High	High	Medium

Table 2: Camden's Dwelling Size Priorities Table (Table 1 of Camden's Local Plan)

Unit Mix – Assessment

9.9 The proposed residential building will provide 3 x 2 bed 3 person units, all of a social-affordable rented housing tenure.

9.10 The proposed unit mix is a result of extensive pre-application discussions with Camden Council, who advised that the Council's current priority for social affordable units is 2 bed 3 person units.

9.11 The proposed unit mix will therefore provide, for and contribute to, the priority household type within Camden, in line with housing need.

Unit Size – Policy

9.12 Previous London Housing Design Guide and Lifetime Homes guidance documents have been replaced by the London Plan Housing Supplementary Planning Guidance

(March 2016) and the Housing Standards Minor Alterations to the London Plan (March 2016).

- 9.13 At the local level Camden Local Plan Policy H6 requires all homes to meet the nationally described space standards.

Unit Size – Assessment

- 9.14 The proposed residential units have been designed and planned to comply with the requirements set out within the London Housing Supplementary Planning Guidance and Building Regulations.
- 9.15 The minimum space standards set out at London Plan Policy 3.5 are comfortably met.
- 9.16 Each of the three residential units will be designed to meet the guidance of M4(2) of the Building Regulations.

Amenity Space – Policy

- 9.17 The Camden Housing CPG (2018) Chapter 4 refers to the Mayor's Housing SPG (2016) Standard 26 and 27 which requires a minimum of 5sqm of private outdoor space per one-two person unit with an extra 1sqm per additional occupant. Minimum depth and width for private amenity space is 1500mm.

Amenity Space – Assessment

- 9.18 Each of the residential units proposed will have its own external private amenity space in the form of a balcony facing onto Delancey Street. The proposed balconies meet the requirements of the Mayor's Housing SPG in terms of size, including depth and width. Therefore, the proposed private amenity space will be provided in accordance with regional and local planning policy. Accordingly, the amenity space for the residential units is acceptable.

Privacy – Policy

- 9.19 Policy 7.6 (d) of the London Plan seeks to ensure that developments do not cause unacceptable harm to the amenity of residential buildings in relation to privacy and overshadowing.
- 9.20 In relation to new housing development, Standard 28 of the Mayor’s Housing SPG requires habitable rooms within each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.21 Supporting paragraph 2.3.36 of the Mayor’s Housing SPG states that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. The SPG states that in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). The SPG states that these can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the City, and can sometimes unnecessarily restrict density.
- 9.22 At the local level, Camden Local Plan Policy A1 advises that the Council seek to protect the quality of life of occupiers and neighbours. In doing so, they will grant permission for development unless this causes unacceptable harm to amenity. In achieving this, the Council will consider the impact development proposals would have on visual privacy and outlook.
- 9.23 The Camden Amenity CPG paragraph 7.4 advises that “development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking”.

Privacy – Assessment

- 9.24 The proposed residential units will face onto Delancey Street, with a mixed use building directly opposite comprising commercial use at ground and first floor level, with residential use at second floor level. There are also windows proposed along the Signmaker's Yard elevation, which will face onto a blank elevation wall of the neighbouring building. There are no windows proposed to the rear of the residential units.
- 9.25 The Mayor's Housing SPG focuses on overlooking into and from new residential properties and does not set out requirements for overlooking between commercial spaces and residential units. Based on the proposed layout of the units and the nature of the surrounding uses, there are considered to be limited opportunities for overlooking of the residential units, save for the less sensitive commercial premises opposite the units on Delancey Street, and the residential units at second floor level opposite the site. In any event, it is certainly not unusual to have habitable windows facing habitable windows with the width of a road in between.

Aspect – Policy

- 9.26 Standard 28 in the Mayor's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.27 Standard 29 of the Mayor's Housing SPG requires dual aspect units wherever possible. In particular, the Housing SPG states that north facing single aspect units which are exposed to significant noise levels or which contain three plus bedrooms should be avoided.
- 9.28 Camden Local Plan, at paragraph 7.32, states that all residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use, is dual aspect except in exceptional circumstances.

Aspect – Assessment

- 9.29 All of the proposed residential units are dual aspect. Accordingly, the proposals are considered to accord with policy at all levels.

10 Energy and Sustainability

- 10.1 A Sustainability Statement (including BREEM Pre-Assessment) and an Energy Statement have been produced by PSH and submitted as part of the Application. These documents set out the environmental performance and the sustainability credentials of the Proposed Development. These reports should be read alongside this section of the Statement.
- 10.2 Within the NPPF, the Government requires that planning supports the transition to a low carbon future. In achieving this planning should shape development so that it contributes to significant reductions in greenhouse gas emissions and improve its resilience to climate change.
- 10.3 Paragraph 150 of the NPPF states that new development should avoid increased vulnerability to the range of impacts arising from climate change, help reduce greenhouse gas emissions. The NPPF states that in achieving this, the location, orientation and design of development should be considered.
- 10.4 The London Plan Policy 5.2 encourages development proposals to “make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
 - Be lean: use less energy;
 - Be clean: supply energy efficiently;
 - Be green: use renewable energy”.
- 10.5 London Plan Policy 5.2 also requires, for both residential and non-residential development, a reduction in carbon emissions of 40% beyond 2010 Part L. The GLA has subsequently published guidance confirming that this is broadly equivalent to a 35% reduction beyond 2013 Part L.
- 10.6 Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. 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.

- 10.7 Policy 5.6 of the London Plan requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 10.8 London Plan Policy 5.7 outlines that the Mayor seeks to increase the proportion of energy generated from renewable sources, and all major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 10.9 The Mayor's Sustainable Design and Construction SPG (2014) advises that Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. It also sets out the following design measures for improving the sustainability of developments:
- optimise natural daylight;
 - optimise solar gain;
 - optimise insulation;
 - optimise air tightness;
 - optimise thermal mass;
 - Incorporate green infrastructure;
 - Maximise potential for natural ventilation.
- 10.10 At the local level, Camden Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all development to meet the highest feasible and viable environmental standards. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.
- 10.11 In support of these objectives Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.

- 10.12 Camden Local Plan Policy CC2 advises that development should adopt appropriate climate change adaption measures. CC2 requires any development involving 5 or more residential units or an increase of floor space of 500sqm to, where appropriate; protect existing and promote new green infrastructure; maintain and where possible reduce surface water run-off and incorporate bio-diverse roofs and green walls. Measures should also be included to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 10.13 In assessing the sustainable design and construction of development the Council will promote and consider the following;
- how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
 - encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
 - encouraging conversions and extensions of 500sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and
 - expecting non-domestic developments of 500sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

Assessment

- 10.14 The Applicant is committed to delivering a scheme with good environmental performance. Morris and Co and the project team have worked to ensure that sustainability measures have been considered in detail. The proposed development will be highly sustainable and energy efficient.
- 10.15 An Energy Statement and Sustainability Statement (including BREEAM pre-assessment report) have been prepared by PSH and submitted in support of this Application.
- 10.16 The report contains the predicted energy and carbon emission of the proposed development and sets out the proposed low and zero carbon technologies to be

incorporated into the scheme. It assesses how the proposals seek to accord with the policies and principles of sustainable development.

- 10.17 The strategic approach to the design of the development has been to follow the Mayor's London Plan Energy Hierarchy. The strategy aims to reduce energy demand in the first instance prior to the consideration of integrating low and zero carbon energy sources. This has been reported through the 'be lean, clean and green' stages of design, as set out in detail within the accompanying Energy Statement.
- 10.18 In summary, after applying the principles of the Energy Hierarchy, the entire site can demonstrate potential cumulative CO₂ emission reduction of 47% or 60 tonnes per annum, from the Part L 2013 baseline scenario.
- 10.19 The results demonstrate that the current site-wide design exceeds the London Plan 35% reduction target. This result incorporates an appropriate buffer to ensure the London Plan CO₂ target can be achieved following the design development of the proposals moving forward.
- 10.20 Whilst the CO₂ percentage reduction target has been met for the site-wide calculations, the domestic areas achieve a CO₂ reduction of 21%. Therefore, to meet the zero carbon target for the domestic areas, the remaining 79% must be offset by a cash in-lieu contribution of £2,397.
- 10.21 As per the Camden Local Plan, the strategy has followed the approach of London Plan, and with the domestic off-set payment, is determined to be in compliance.
- 10.22 The 'be green' scenario shows that the CPG Energy Efficiency and Adaptation (2019) requirement to achieve a 20% reduction via on-site renewables has also been surpassed.
- 10.23 The scheme has demonstrated its adaptability to climate change by minimising active cooling by 33%.
- 10.24 The mandatory credits for an 'Excellent' rating (with regards to energy related criteria) under BREEAM UK NC 2018 Ene 01 have been met.

- 10.25 The proposed energy strategy for the site is considered to be compliant with adopted national, regional and local policies.

Flooding and Drainage – Policy

- 10.26 Paragraph 163 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Paragraph 165 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 10.27 London Plan Policy 5.12 deals with flood risk management and advises that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development. Policy 5.13 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 in line with the drainage hierarchy set out within the policy.
- 10.28 At the local level Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.

Flooding and Drainage – Assessment

- 10.29 The site is located within Flood Zone 1, which is defined as land having a 1 in 100 or greater annual probability of river flooding; or a 1 in 200 or greater annual probability of sea flooding. Flood Zone 1 is the lowest risk of flooding. Furthermore, the assessment undertaken within the accompanying Report indicates that the risk of flooding from both surface water and reservoirs is very low, and existing borehole records from the area indicate a low risk of ground water flooding. Therefore, the site is considered to be at low risk from all forms of flooding.

- 10.30 In accordance with the NPPF, London Plan, and Camden Local Policies, the new development will incorporate a Sustainable Drainage System (SuDS) to manage rainfall on site and ensure that runoff is not increased elsewhere.
- 10.31 The proposed SuDS strategy for the site includes utilising blue roofs to attenuate surface water at source, store below the roof top and discharge this at a 48% reduced flow rate. This will provide the lowest practical control rate without significantly increasing the risk of flooding and having blockages in the system. Full details of the proposed SUDS are set out in the accompanying Flood Risk Assessment and Surface Water Drainage Strategy, prepared by Clancy.

11 Transport

- 11.1 Within the NPPF, the Government places great weight on the importance of delivering sustainable transport solutions to support new development so that the potential impacts of development on transport networks can be addressed, opportunities to promote walking, cycling and public transport use are identified and pursued, and the environmental impacts of traffic and transport can be minimised. In pursuance of these objectives paragraph 102 of the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals.
- 11.2 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore paragraph 104 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
- 11.3 Paragraph 110 of the NPPF states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, facilitate access to high quality public transport, address the needs of people with disabilities and reduced mobility in relation to all modes of transport; create places that are safe, secure and attractive, while responding to local character and design standards, allow for the efficient delivery of goods, and access by service and emergency vehicles, and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 11.4 One of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor's Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.
- 11.5 Policy 6.1 of the London Plan seeks to ensure the integration of transport and development by a number of strategic measures including:
- Encouraging patterns and forms of development that reduce the need to travel, especially by car;

- Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration; and
 - Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development.
- 11.6 Paragraph 111 in the NPPF and London Plan Policy 6.3 require applications for development proposals which could cause significant increases in movement to be accompanied by an assessment of the impact of the scheme on existing transport networks, as well as an assessment of how the scheme optimises sustainable methods of travel.
- 11.7 Policies 6.9 and 6.10 in the London Plan sets out the Mayor’s steps for bringing forward a significant increase in cycling and walking in London. With respect to cycling, development should provide secure, integrated and accessible cycling facilities in line with the minimum standards set out in London Plan, as well as providing on-site changing facilities and showers for cyclists.
- 11.8 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”.
- 11.9 The Mayor’s Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the London Plan providing a vision of London as an exemplary sustainable world city.
- 11.10 Table 4 sets out the minimum cycle parking standards relevant to the application. In order to encourage walking, development proposals should ensure high quality pedestrian environments:

Land Use	Long-stay	Short-stay
Food retail (Class A1)	1 space per 175 sq. m	1 space per 40 sq. m for the first 750 sq. m, 1 space per 300 sq. m thereafter
Non-food retail (Class A1)	1 space per 250 sq. m	1 space per 125 sq. m
Hotels (Class C1)	1 space per 20 bedrooms	1 space per 50 bedrooms
Dwellings (Class C3)	2 spaces for 2bed+ units	1 space per 40 units

Table 4: Relevant London Plan Cycle Parking Minimum Standards (Table 6.3, London Plan)

- 11.11 At the local level Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 11.12 Policy T1 (g) states that Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden's Transport CPG.
- 11.13 Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high quality safe road crossings where needed and seating.
- 11.14 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 11.15 Policy T4 of LBC's Local Plan states that "Developments of over 2,500sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to... accommodate goods vehicles on site."

Assessment

- 11.16 A Transport Assessment (including a Travel Plan and Delivery and Servicing Management Plan), prepared by RGP has been submitted in support of this Application. The Transport Assessment assesses the likely transport implications arising from the proposed development and sets out the proposed parking, access and servicing arrangements.
- 11.17 The Site benefits from a PTAL rating of 6b, which demonstrates ‘the best’ access to public transport. The site is therefore well served by public transport services.
- 11.18 The site is located approximately 250 metres to the south of Camden Town Underground Station which is served by both branches of the Northern Line. Camden Road Rail Station is located approximately 500m to the north-east of the site, Euston Station is located approximately 1km to the south and King’s Cross is located approximately 1.2km to the south-east. There are also a number of bus routes surrounding the site connecting it to the rest of Camden and wider London.
- 11.19 In terms of car parking provision, the development proposals accord with the objectives of Camden Local Plan Policy T2 and London Plan Policy 6.2. The scheme will be a car-free development.
- 11.20 There is no identified need for dedicated disabled parking within the site; therefore, in the infrequent event of disabled parking being needed, this would be accommodated within existing on-street public provision. It is noted that blue badge holders are permitted to park free of charge and with no time limit in resident permit holder and pay & display parking bays within Camden. There is significant on-street parking on Arlington Road, within approximately 50-75m of the site, which could therefore be utilised by disabled guests in the infrequent event that they require a car to access the site.
- 11.21 The development proposals include 5 long-stay cycle parking spaces for the commercial uses, located within secure cycle storage in Signmaker’s Yard. 6 cycle parking spaces are provided for the residential units, located at ground floor level of the residential building within a sheltered and secure bike store.

- 11.22 The existing cycle parking located within Signmaker's Yard, comprising 20 covered Sheffield style cycle stands that currently serves the neighbouring office accommodation immediately north of the site at Bedford House, will be suitably re-provided within Signmaker's Yard as part of the development proposals.
- 11.23 The proposed cycle parking provision exceeds the minimum cycle parking standards set out within the London Plan Table 6.3 and Policy T1 within the Camden Local Plan.
- 11.24 Pre-application discussions with Camden's highways and planning officers confirmed that Officers are supportive of the building line being pulled back, as shown on the proposed site plans, which would provide an increased footway width to the benefit of pedestrians. Officers confirmed the Council / TfL would be pleased to formally adopt these strips of footway as public highway, providing an improved pedestrian environment around the site.

Trip Generation

- 11.25 In order to determine the net effect of the development proposals the number of trips forecast to be generated as a result of the proposed development has been compared with the operation of the existing site.
- 11.26 Available comparable data indicates that circa 2,500 primary two-way movements could currently be generated at the existing site.
- 11.27 Considering the location of the site, it is likely that public transport and active modes of travel such as walking and cycling would be the primary choice for all users to access the proposed development, as well as for use by guests during their stay.
- 11.28 The proposed development would generate a total of 646 two-way movements (by all modes) over the course of a typical day, comprising a maximum of 41 two-way movements during the PM peak hour, which is not considered significant.
- 11.29 A total of 27 two-way taxi movements would be generated over the course of a typical day, comprising a maximum 2 two-way taxi movements during the PM peak hour, which is not considered significant.

Coach and Taxi Activity

- 11.30 Owing to the proposed hotel concept, coach parties are not anticipated and therefore no dedicated coach parking is proposed.
- 11.31 Whitbread hotels discourage and rarely accept coach party bookings and there is no incentive offered to coach operators, hence this decreases the attractiveness. For example, of the 20 Premier Inn hotels within Central London, only three hotels have accommodated coach party bookings over the last 2 years. The business model of Central London Premier Inn hotels is principally to cater for transient business trade (business and leisure related) whereby there is no requirement for coach access.
- 11.32 When considering hotels generally and not the specific operator, it is evident that developments in central London typically attract a negligible level of coach-borne trade. This has been confirmed through a review of available hotel use data (since 1 January 2007) within the TRICS database.
- 11.33 Notwithstanding this, in the unlikely event of a coach party booking, it is anticipated that drop-off activity could be safely accommodated within the loading bay on Camden High Street or from Signmaker's Yard, as per the loading arrangements discussed in the following section of this report. A coach could then continue to the coach park at Regents Park, approximately 800m to the west of the site.
- 11.34 The proposed hotel would not be anticipated to generate a significant level of taxi pick-up / drop-off activity. This is evidenced by the comparable 'Hub by Premier Inn' survey data which identifies there would be a total of 13 taxi visits at the site on a typical weekday. It is therefore anticipated that local taxi ranks on Camden High Street and appropriate kerb-side locations could be safely and conveniently utilised for the limited pick-up /drop-off purposes of the hotel. The closest taxi rank to the site is located on Greenland Street, approximately 120m to the north, although the loading bay at the site frontage is likely to be used for drop-off purposes and could be safely utilised.

- 11.35 Camden highways officers acknowledged during pre-application discussions that coach and taxi activity would be insignificant and no dedicated facilities for these vehicles would be necessary.

Delivery, Servicing and Waste Management

- 11.36 Currently, deliveries to the site are received either from the loading bay on Camden High Street or from the edge of carriageway on Delancey Street (as permitted outside of the peak highway hours).
- 11.37 Regarding Camden Local Plan Policy T4, notwithstanding the fact the development is over 2,500sqm, the proposed hotel would generate an average of 2 delivery / service vehicle visits per day (down from the 4 visits that could be generated by the current retail use), which is not considered to represent a 'significant' level of activity. Notwithstanding this, the proposals would provide an on-site servicing arrangement.
- 11.38 Under the proposals, deliveries to the retail unit would continue to be accommodated from the loading bay on Camden High Street. The proposed retail unit would generate a reduced level of servicing activity compared to the existing retail unit given the net reduction in floorspace. Deliveries to the hotel would be accommodated from the service yard at Signmaker's Yard, whereby the delivery vehicle would reverse into the yard and depart onto Delancey Street in a forward gear. No delivery activity would take place directly on Delancey Street.
- 11.39 Pre-application discussions with Camden's highways and planning officers confirmed that the Council are supportive of delivery and servicing activity being undertaken off-street within Signmaker's Yard, which would require vehicles to reverse into the yard in order to depart in a forward gear.
- 11.40 Delivery drivers would have a good level of visibility towards cyclists when reversing into the service yard, since any cyclists would approach from the north-west. This arrangement would act to minimise the potential impact on vehicular and cyclist through-flow on Delancey Street, whilst also minimising the potential impact on servicing of other commercial units nearby.

- 11.41 A delivery schedule will be prepared in order to ensure deliveries do not overlap and hence ensure only one delivery vehicle is present on-site at any given time. Delivery vehicle arrivals are carefully planned, with the arrival time fixed to within an hour taking allowance for traffic disruptions, for example.
- 11.42 Refuse collections for retail and hotel would be privately contracted and undertaken as per their respective delivery / servicing arrangements. Waste and recycling collections for the residential units would be serviced by a kerbside collection (as per Camden's guidance for developments of 6 units or fewer). Residents would be responsible for transferring waste and recycling to street level in advance of the scheduled collection time.
- 11.43 Further detail on the proposed servicing arrangements, including relevant management measures and waste / recycling capacities, is provided within the accompanying Delivery & Servicing Management Plan which has been prepared as part of the application.
- 11.44 The Transport Assessment concludes that the proposed development would not have a demonstrable impact on the local highway network and there are no transport and highway impediments that should prevent the granting of planning permission. The Travel Plan which accompanies the Transport Assessment outlines measures which would be implemented to promote sustainable travel modes for journeys to and from the site by all site users.
- 11.45 The proposed development is considered to meet the objectives of current national, regional and local policy for a number of reasons, including:
- The proposed development supports NPPF's objectives, to promote more sustainable transport choices and to promote accessibility to jobs and services; thereby reducing the need to travel;
 - The site has excellent accessibility to public transport, with many local bus, main line rail and Underground services available within a short walking distance from the site. This fulfils a number of policy objectives;
 - Secure cycle parking will be provided thus achieving a number of cycling standard at regional and local level;
 - The proposed development is car-free;

- The provision of a Travel Plan that manages and monitors the trips associated with the proposed development will ensure that building users make trips in the most sustainable way possible;
- Taxi activity could be accommodated on-street, characteristic of the local area, whilst coaches would be very infrequent and could be appropriately managed if they were to arrive at the site; and
- Delivery and servicing activity would be minimal and would be undertaken on-site from Signmaker's Yard without impacting on traffic through-flows.

11.46 The Transport and Servicing arrangements are covered in further detail within the Transport Assessment and associated appendices, prepared by RGP, which accompany this Application.

12 Technical Considerations

- 12.1 This section addresses other technical amenity considerations including air quality, noise and daylight and sunlight.

Air Quality – Policy

- 12.2 NPPF paragraph 180 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity.
- 12.3 The London Plan Policy 7.14 seeks to reduce pollutant emissions and minimise public exposure to pollution. The Mayor will work with strategic partners to ensure that the policies of the London Plan support the implementation of Air Quality and Transport Strategies.
- 12.4 The GLA Housing SPG Standard 33 requires development to “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs))”.
- 12.5 The GLA Sustainable Design and Construction SPG (paragraph 4.3.2) states that “the two pollutants of specific concern in London are particulate matter (PM10 and PM25) and nitrogen dioxide (NO2)”. Transport is the prime contributor of these emissions in Greater London.
- 12.6 At the local level Camden Local Plan Policy CC4 states that London Borough of Camden will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. When assessing development proposals consideration will be taken to the actions identified in the Council’s Clean Air Action Plan.

- 12.7 Camden Amenity Planning Guidance states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 12.8 The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.
- 12.9 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to “minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance”.

Air Quality – Assessment

- 12.10 An Air Quality Assessment (AQA) has been undertaken by Phlorum and is submitted in support of the Application.
- 12.11 UK-AIR background concentrations and local air quality monitoring results from the wider area suggest that whilst air quality adjacent to busy roads is often poor, background pollution concentrations across the site are likely to be below the relevant UK Air Quality Strategy Standard concentrations.
- 12.12 Concentrations across the site in 2021, the year of anticipated opening, are predicted to be below the relevant Air Quality Standards for PM₁₀ and PM_{2.5}. However, in the context of long term Air Quality Objectives, there was one marginal exceedance of the 38µg.m⁻³ World Health Organisation (WHO) limit value at the location of the proposed first floor residential dwelling. As such, mitigation has been proposed to mitigate the impact of exposure.

12.13 The AQA advises that the following mitigation is proposed to protect the health and amenity of future occupiers of the residential dwellings:

- First floor (where a marginal exceedance of the WHO limit value was predicted) – MVHR providing daily mechanical supply and extract ventilation, complete with carbon filter on the fresh air intake. Purge ventilation via openable windows;
- Second floor – mechanical extract ventilation with fresh air make-up via trickle vents in the windows. Purge ventilation via openable windows; and
- Third Floor – mechanical extract ventilation with fresh air make-up via trickle vents in the windows. Purge ventilation via openable windows.

12.14 To note, the operational phase of the development is not expected to cause an increase in pollutant concentrations but is expected to introduce new sensitive receptors into an area of existing poor air quality. As such, mitigation, as set out above, will be required to protect amenity and health.

12.15 It is anticipated that the proposed development will achieve air quality neutral standards, in line with the requirements of the London Plan.

12.16 The demolition and construction phase of the proposed development will involve a number of activities that could produce polluting emissions to air. Predominantly, these will be emissions of dust. Overall, the dust emission magnitude is considered to be 'medium'. During construction, adopting appropriate mitigation measures, as set out in the accompanying AQA should prevent any significant air quality effects on the surrounding area and reduce the significance of the impact of each phase of the construction programme to 'negligible'. There should therefore be no significant residual effects, in line with the requirements of the NPPF and PPG.

12.17 The AQA concludes that with mitigation in place to protect the amenity and health of future users / occupiers, the proposed development is expected to comply with all relevant air quality policy. As such, air quality should not pose any significant obstacles to the planning process.

Noise – Policy

- 12.18 The NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
- 12.19 Policy 7.15 of the London Plan confirms that development proposals should seek to reduce noise by: minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals; separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation and; promoting new technologies and improved practices to reduce noise at source.
- 12.20 Camden Local Plan Policy A4 advises that the Council will seek to manage noise and vibration within the Borough. As such development will only be permitted where it can operate without causing harm to amenity. In pursuance of this development should have regard to Camden's noise and vibration thresholds set out at appendix 3 of the Camden Local Plan.

Noise – Assessment

- 12.21 A Noise Impact Assessment has been prepared by 24 Acoustics and accompanies the Application. The Noise Impact Assessment presents the results of the surveys that were carried out in January 2019 and assesses the implications against appropriate design standards and current planning guidance.
- 12.22 The primary source of noise in the area is road traffic and the site is also affected by noise from nearby licensed premises and vibration from the underground northern line. The scheme will also include new building services plant and a retail unit.
- 12.23 Environmental noise and vibration measurements have been undertaken at the site to determine existing noise and vibration levels during daytime and night-time periods. Preliminary recommendations have been provided for acoustically rated glazing and alternative means of ventilation to the proposed hotel bedrooms and apartments.

Maximum external noise levels for building services plant serving the development have been established, applicable at the nearest noise sensitive properties. A target performance specification has been provided for party floors between residential and other uses. Measured vibration levels were found to be acceptable in the context of relevant guidance. The risk of re-radiated noise, from underground trains, occurring within the proposed habitable rooms is considered low.

- 12.24 Based on the above, suitable noise and vibration criteria have been established in line with local authority requirements, the hotel specification and relevant standards and guidance. It is concluded that noise and vibration levels at the development will be acceptable for future occupiers of the scheme and for neighbouring occupiers. As such the scheme is considered to be in accordance with London Plan Policy 7.15 and Camden Local Plan Policy A4.

Daylight and Sunlight – Policy

- 12.25 Access to daylight and sunlight is important for general amenity, health and well-being, as well as bringing warmth into homes thereby reducing the energy consumption. As such it is crucial the development proposals include good levels of daylight and sunlight accessibility.
- 12.26 London Housing SPG Standard 32 advises that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.
- 12.27 Camden Local Plan Policy A1 seeks inter alia to protect daylight/sunlight values within existing and proposed development. The text at paragraph 6.5 supporting Policy A1 states that in assessing daylight/sunlight values Camden will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).
- 12.28 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them.

12.29 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.

12.30 In regard to daylight and sunlight Camden's Amenity CPG states that they will:

- Expect all buildings to receive adequate daylight and sunlight.
- Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.
- Base their considerations on the Average Daylight Factor and Vertical Sky Component.

Daylight and Sunlight Assessment

12.31 A Daylight and Sunlight Assessment has been prepared by Point 2 Surveyors, which assess the potential daylight and sunlight effects as a result of the proposed development on the existing surrounding residential properties. The Report also assesses the daylight levels within the proposed development for the three proposed affordable residential units. The proposed development has been the subject of iterative testing throughout the pre-application consultation phase and has been modified with a view to limiting the effects of the development upon the existing neighbours' amenity wherever possible.

12.32 The following properties have been identified as residential and therefore are considered sensitive receptors for the purposes of our daylight and sunlight analysis and have been quantitatively assessed:

- 100 Camden High Street
- 102 Camden High Street
- 104 Camden High Street
- 106 Camden High Street
- 111-113 Camden High Street
- 3-7 Delancey Street
- 9 Delancey Passage
- 100-102 Arlington Road

- 12.33 The results of the technical analysis confirm that in overall terms, 83% of windows tested will meet the typical BRE guidance in relation to the Vertical Sky Component (VSC) assessment; 89% of rooms will meet the No-Sky Line (NSL) recommendations and 100% of windows will meet the Annual Probable Sunlight Hours (APSH recommendations).
- 12.34 The technical analysis shows that the properties located on the opposite side of Camden High Street to the east of the site and 100-102 Arlington Road to the west of the site are fully BRE compliant. 3-7 Delancey Street and 9 Delancey Passage each have one window serving them that are fractionally short of meeting the guidelines for the VSC assessment, however in all instances each room will comfortably meet the NSL and APSH (where applicable) criteria. It is therefore considered that the overall effect of the proposed development on these properties will not be noticeable.
- 12.35 There are some more noticeable relative changes in daylight to 111-113 Camden High Street. However, the retained levels of daylight are shown to remain good for a town centre/urban location (circa 19% or more absolute VSC). Whilst this may be a change from the very high levels of daylight currently received, it is typical of urban areas where lower levels of daylight amenity are often offset with access to a number of other amenity benefits.
- 12.36 Overall, whilst there are some neighbouring properties that will experience relative reductions in daylight amenity when compared to the existing site conditions, the levels of retained daylight are commensurate with a town centre location and the majority of surrounding habitable rooms will experience little or no loss in daylight or sunlight. In our opinion, the effects of the proposed development should be considered holistically alongside the wider planning context and a flexible application of the BRE Guideline recommendations.
- 12.37 Point 2 conclude that in any instances where BRE guidelines are not fully adhered to, the site is located in an area where a degree of flexibility of the guidance should be exercised when determining the acceptability of those effects upon neighbouring amenity.
- 12.38 In relation to the daylight amenity within the affordable residential units of the proposed development, the vast majority will meet the minimum Average Daylight

Factor (ADF) criteria. The two rooms that do not meet the ADF recommendations are located within the first-floor apartment where access to daylight is generally more limited in town centre locations. One of the rooms will be in use as an living/dining room, which achieves 1.2% ADF. This is only slightly below the 1.5% minimum ADF recommendations for living rooms and it is also noted that the primary window serving the space is located within an inset balcony. It is widely accepted that balconies restrict the ability for daylight to reach rooms located directly below and it is often the case in modern town centre schemes that there must be a trade-off between providing valuable private amenity space, in accordance with planning policy, and the provision of adequate daylight amenity within the rooms.

- 12.39 The remaining room is a small galley-style kitchen which achieves 1.4% ADF. Whilst this is below the recommended 2% ADF target, it is not uncommon for a kitchen to achieve this level of daylight within urban areas.
- 12.40 It is therefore considered that the design and layout of the proposed development has been developed to maximise the daylight potential to the proposed new dwellings wherever possible, whilst also providing private amenity balconies. There is generally a very good rate of compliance with the internal daylight recommendations, and in the isolated instances where they are not achieved, the rooms will still receive reasonable levels of daylight when considering the site's urban location.

13 Planning Obligations

- 13.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 13.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 56 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- Necessary to make the Proposed Development acceptable in planning terms;
 - Directly related to the proposed development; and
 - Fairly and reasonably related in scale and kind to the proposed development.
- 13.3 Paragraph 56 of the NPPF indicates that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 13.4 On 6th April 2010, the Community Infrastructure Levy Regulations 2010 (as amended) came in to force to fund the provision, improvement, replacement or maintenance of infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).
- 13.5 In accordance with Regulation 19 of the CIL Regulations 2010 (as amended), the London Borough of Camden submitted a Draft Charging Schedule for independent examination together with supporting evidence on 28 August 2014. The document provides guidance regarding the circumstances on which proposed developments will give rise to the need for the Council to seek contributions to infrastructure and how the various mechanisms, such as CIL, Crossrail SPG, separate Section 106 contributions and Section 278 agreements, will interplay in practice. The Charging Schedule was approved by Camden Council on 2 March 2015 and CIL Charging commenced on 1 April 2015.

- 13.6 The Applicant will enter into a legal agreement with the Council to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations, Camden's Local Plan Policies C2 and DM1 and Camden's Planning Obligations SPG.
- 13.7 The final content and scope of planning obligations will be negotiated through the planning application process. However, it is anticipated that the S106 will provide for the following:
- Affordable housing;
 - Car free;
 - Construction Management Plan and implementation support contribution;
 - Energy Efficiency and Renewable Energy Plan;
 - Carbon offset contribution;
 - Employment and training contribution; and
 - Local procurement and associated fee.

Community Infrastructure Levy

- 13.8 As noted above the London Borough of Camden's CIL Charging Schedule came into effect on 1 April 2015. It requires:
- £500 per square metre for residential floorspace below 10 dwellings (or 1000sqm);
 - £25 per square metre for retail floorspace; and
 - £40 per square metre for hotel floorspace.
- 13.9 Mayoral CIL2 is charged at £80 per square metre for residential, retail and hotel floorspace within this part of Camden.

14 Summary and Conclusions

- 14.1 In summary, Demar (BVI) Holdings Limited ('the Applicant'), is seeking planning permission for the demolition and redevelopment of 115-119 Camden High Street as a new mixed-use development comprising retail, residential and hotel floorspace, with 2.5 times the amount of the affordable housing floorspace requirement, within a Central London and Town Centre location, and with regard to national, regional and local planning policy.. The proposed development sought is as follows:

“Demolition of existing building and erection of a part 4 part 5 storey building comprising retail floorspace (Class A1), hotel (Class C1) and 3 affordable residential units (Class C3) and associated works”.

- 14.2 The existing building is dominated by its entirely modern and poor quality shopfront, which detracts from the character of Camden High Street and the Camden Town Conservation Area. The existing building is disproportionately low within its immediate context, particularly as it is a corner building at the junction of Camden High Street and Delancey Street. Consequently, the building does not contribute positively to the streetscape and fails to make efficient use of the land. Accordingly, there is opportunity for the redevelopment of the site and improvements to the surroundings.
- 14.3 The existing unattractive, poor quality and inefficient building will be redeveloped and the proposals present an opportunity to reinvigorate this important part of Camden Town. At a regional level, the London Plan prioritises development in locations which are well served by public transport. The proposed development has excellent public transport links being in the proximity of Camden Town Underground Station, Camden Road Rail Station, Euston Station and King's Cross Station.
- 14.4 The development of a new hotel in this location will also be adding to the much-needed visitor accommodation as confirmed within the adopted London Plan (2016) which sets a target of providing 40,000 net additional hotel rooms by 2036. Hotel guests will also greatly benefit the local economy by supporting other local businesses and activities, including shops, restaurants and other cultural and entertainment activities. This will support London's wider economic function as a tourist and business destination.

- 14.5 The proposed hotel will result in the provision of up to 35 new jobs directly associated with the hotel. These jobs are particularly beneficial to the local area since the hospitality sector provides job opportunities to a wide range of people with different levels of education, skill sets and work experience. The proposed development would support further employment through supply chain impacts and expenditure of both hotel guests and workers. Job opportunities will also be created by the contractor during the construction phase of the development. Economic benefits of guest expenditure will be generated within the local area and across London, external to the hotel.
- 14.6 The proposals will result in the provision of three much needed high quality affordable homes of a social rented tenure, directly in line with Camden's housing need.
- 14.7 Although there is a loss in the amount of retail floorspace proposed on site, crucially, the primary retail frontage is retained and protected and the proposal provides a more optimal sized prime ground floor retail unit in accordance with the demands of modern retailers. As such, the scheme proposals are considered to be in line with Policy TC2, which seeks to protect the primary retail frontage. The provision of a small shop premises suitable for a small and/or independent business is also directly in line with Policy TC5. The proposed unit is also considered to be the most desirable and viable for potential retailer's in today's retail environment.
- 14.8 The proposed design will be sympathetic and complement the architectural character of the surrounding area. The proposal will lead to the enhancement of a building and site within the Camden Town Conservation Area and provide a high-quality development that has been designed in terms of scale, massing and detailed design with regard to the surrounding context and the nearby listed buildings, whilst still being of modern design. The proposed scheme will therefore enhance the overall townscape of this part of Camden.
- 14.9 The effect of the proposed development on the nearby listed building and the conservation area has been assessed. It is concluded that the proposals preserve and enhance the character and appearance of the conservation area and preserves the setting of the nearby listed building, and thus satisfies the statutory test at Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposals do not lead to 'substantial' harm or any meaningful level of 'less than

substantial' harm to the conservation area, or any other heritage assets. Furthermore, the proposed scheme complies with both national and local planning policy.

14.10 The proposed development helps to achieve the objectives of the Local Plan through:

- Creating a sustainable development that provides retail accommodation ideally suited for a small, independent retailer;
- Providing 3 much needed affordable homes with good residential amenity;
- Providing additional visitor accommodation to support Camden and London's economic function as a tourist and business destination;
- Providing new active town centre uses within a secondary retail frontage and improving the quality of the primary retail frontage thereby enhancing the vitality and competitiveness of Camden Town Centre;
- Creating new employment opportunities both directly and indirectly associated with the proposed development;
- Creating a high quality and attractive design that preserves and enhances the character and appearance of the conservation area and nearby designated heritage assets, while embracing the principles of sustainable design and construction;
- Providing a car free development which encourages use of public transport, in this accessible location, but also walking and cycling, enabling people to lead active and health lives;
- Creating a safe and secure environment for existing and future residents and workers;
- Creating improvements to the public realm through the setting back of the existing building line to widen the footpaths along Delancey Street and Camden High Street and the provision of new, larger crowned trees along Delancey Street.

14.11 The Proposed Development will create a distinctive place, appropriate for its location at the heart of Camden Town with public realm improvements and enhancements seeking to reduce the anti-social behaviour within the area. The provision of active uses at ground floor level will improve the street environment both for those living in the area, but also for those that work there, offering more attractive places to spend time, as well as making the place more legible, safer and visually attractive.

- 14.12 The proposed redevelopment allows the site to substantially enhance the character and local economy of Camden. The intention is that the proposal will act as a catalyst for further improvements to Camden High Street.
- 14.13 As required by Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning Statement has assessed the proposals against the relevant development plan, comprising the NPPF, London Plan with Alterations, and Camden's Local Plan. It is considered that the proposed mixed, balanced and sustainable proposed development will satisfy planning policies at all levels.
- 14.14 Accordingly, we consider that this scheme should be granted planning permission.

Appendix A – Planning History Schedule

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision
18/04/12	2012/2192/A	Advertisement Consent	The display of a vertical internally illuminated box sign, to the ground floor return elevation level in connection with existing retail unit (Class A1).	Refused and Dismissed at Appeal	23/08/12 and 18/03/13
05/07/10	2010/3498/A	Advertisement Consent	Display of twelve projecting signs at first floor level and 3 wall mounted board signs at ground floor level at existing shop (Class A1)	Refused and Dismissed at Appeal	26/08/10 and 12/01/11
05/06/09	2009/2763/P	Full Planning Permission	Installation of eight air conditioning units to flat roof of retail unit (Class A1)	Approved	06/08/10
26/08/09	2009/4200/A	Advertisement Consent	Continued display of 6 non-illuminated tray signs at first floor level of existing retail unit (Class A1)	Refused and Dismissed at Appeal	22/10/09 and 25/03/10
15/04/09	2009/1854/A	Advertisement Consent	Display of two internally illuminated fascia signs (one on Camden High Street main elevation and one on the north side return elevation).	Approved	03/04/09
15/04/09	2009/1848/P	Full Planning Permission	Alterations to shopfront of existing retail unit (Class A1).	Approved	03/07/09
22/09/90	9003448	Full Planning Permission	Alterations of shopfront by erecting a stall-raiser and installation of new windows as shown on drawing no. PSD/329/90/A3-1	Approved	23/10/90
16/02/87	8780041	Advertisement Consent	Installation of fascia lettering illuminated externally as shown in drawing numbers SD/86/8 and 329/87/SF/1. Period of consent 1st July 1987 - 30th June 1992.	Approved	17/06/87
01/05/86	8680103	Advertisement Consent	i) Display of externally-illuminated lettering at fascia level measuring 4450mm in length and 500mm in height. ii) Display of externally-illuminated lettering above the centre doorway measuring 2372mm in length and 130mm in	Approved	04/06/86
01/05/86	8600754	Full Planning Permission	Installation of a new shopfront as shown on drawing no.329/86/1	Approved	04/06/86
14/03/83	AD2251	Advertisement Consent	The display of an internally illuminated fascia panel measuring approximately 18ft 11in wide by 3ft 6in high at the southern most end of the fascia and an internally illuminated double sided projecting box sign measuring 3ft 1in wide by 2ft 1/4in high by 9in deep at fascia level at the northern-most end of the shop front.	Approved	03/05/83
16/11/67	CA/750/A	Advertisement Consent	Set of 24" high internally illuminated yellow letters to read "WOOLWORTH" Length of display 29'5" and sited on fascia with an overall height of 16'.	Approved	11/12/67
14/03/67	J11/19/D/3412	Full Planning Permission	Installation of new shop front at 115-119, Camden High Street, Camden.	Approved	12/04/67

Appendix B – Retail Market Report

Retail Market Report

Subject Premises: 115-119 Camden High street, London NW1 7JS

Client: Demar (BVI) Holding Limited, c/o JLL, 40 Bank Street, London E14

Compiled by Lewis Craig



Report Objective

To assess current retail demand in this area, for:

- a) 1st Floor retail in general.
- b) Units typical to that of the Subject Premises (as detailed below) in terms of overall size across two floors, of circa 11,831 sq ft.
- c) Ground Floor units typical to that of the Subject Premises (as detailed below) of circa 6,113 sq ft.
- d) Smaller units of circa 1,500 sq ft.

Description of the Subject Premises

The location of the Subject Premises is particularly secondary, being in the stretch of Camden High street midway between Camden Town and Mornington Crescent Underground stations.

The measurements and areas used in this report are taken from "Lane & Frankham's Area Referencing Report LF1759", which has been provided by the client.

Ground Floor:	6,113 sq ft NIA
First Floor:	5,718 sq ft NIA
Gross Frontage:	52' 2"
Net Frontage:	49' 2"
Shop Depth:	128' 8"
Shop Width:	48' 4"

The premises are currently occupied by Sports Direct, who we understand are due to vacate at lease expiry date during in June 2019. Further commentary is provided within the section below, "Existing Occupier Strategy".

Subject Location

The larger space retail occupiers represented in Camden High Street are generally in better locations than the specific secondary location of the Subject Premises.

The convenience store food sector is well represented with major brands including Sainsbury's Local, Lidl, Aldi, M&S Foodhall, Tesco Express and Aldi.

Other non-convenience larger space occupiers located in the Subject Premises' locality include Poundland, Waterstones, Argos, Post Office and Boots.

Existing Occupier Strategy

The Current Occupier (t/a Sports Direct) is not renewing their lease at the Subject Premises as it does not fit within their trading format, in terms of size and location.

Interestingly, extracts from their Chief Executive's Report & Business Review from 2017 state:

"The strategy is for Sports Direct to continue investing in rolling out more new generation retail destination stores, which include one or more of the Group's Sports Retail, Premium, Lifestyle and Fitness fascias together on one site. These stores will be fewer in number, but fit for purpose in every respect, major city centre flagship stores in key locations."

"In the UK we have been actively focusing on elevating our store portfolio, typically through relocating smaller format stores to a new generation of stores, with priority on securing flagship stores in strategic retail locations".

"The strategy will involve the rationalisation of stores of this size throughout the UK and relocating into one flagship store".

"Sports Direct is embracing the full multi-channel approach enabling Group wide centralised commercial and support functions, giving the benefit of scale and operating efficiencies to each brand. The focus being on delivering greater benefits for the customer through an enhancing of all retail channels."

"The successful management of a property portfolio is one of the most important foundations of this process. Stores that do not fit the required model become surplus to requirements and are closed". It is apparent that their Camden store (the Subject Premises) does not fit this model.

Site constraints affecting marketability once the current Tenant has vacated

Although the existing retail unit is currently let to Sports Direct, the area of 11,831 sq ft as currently arranged is too large and of the wrong configuration to suit typical current retail occupier interest.

Our experience as a specialist retail property consultancy is that demand is extremely limited for retail units offering in excess of 2,500 sq ft in Camden and indeed in similar urban London High streets.

An example close to the Subject Premises is 159-161 Camden High Street, offering 4,741 sq ft all at ground level, located in a more central pitch closer to Camden Town Underground. We are advised by the letting agent that this was marketed for 18 months prior to a letting transaction being entered into with Tesco in February 2018 for 2,400 sq ft. We understand that the balance of the space remains unoccupied and available.

We at Lewis Craig have been marketing the former Poundland premises at 41-43 Lewis Grove Lewisham since January 2018, this being 4,157 sq ft, of similar size and location to the example above. Our experience has been that there has been no serious interest from any party interested in securing the entire space, being too large for where the retail market demand is. As a consequence our client has now split the space and is applying for A3 use on some 3,000 sq ft, where we are now under offer to an operator, with the balance due to be marketed as retail.

Demand for retail space at first floor is on the decline, as retail shoppers are typically seeking ease, and visual sightlines to merchandise when entering a shop, rather than having to venture up or down stairs to access additional sales areas.

From the retailer's perspective, in an increasingly challenging retail environment, their space needs continue to reduce to provide the most cost effective useable stores, particularly in London's central urban locations such as Camden, where occupancy costs tend to be higher.

The demand for first floor or basement space is coming from alternative uses such as health, fitness, leisure, beauty and flexible-style offices. We are currently advising on a scheme in Kilburn with a significant full cover first floor, with the main interest being from such alternative uses and not retailers.

We consider that dividing the ground floor from the first floor and then splitting the entire ground into two units each offering circa 3,000 sq ft is not a viable option. The resultant units would be too long and narrow, each with frontages of circa 24 ft and depths of 128' 8", being clearly undesirable options for a retailer.

With regard the Subject Premises, we would suggest that the strongest retail demand in the open market would be for a unit offering circa 1500 to 2000 sq ft, at the same time benefitting from the existing unit's entire frontage, and ideally making good use of the substantial return frontage on Delancey Street (currently bricked up). This would not damage the character and function of the Subject Premises' Central London Frontage, being in line with Camden's Local Plan policy TC2.

Local Retail Market Conditions

It is apparent that most retail units currently, or recently, on the market on Camden High Street are considerably smaller than the Subject Premises, typically ranging from 700 sq ft to c.3,000 sq ft, being made up of a mix of ground floor lock-up shops, and ground floor with basement shops.

When considering current retailer's property requirements for Camden, the vast majority are seeking the more standard size of between circa 700 sq ft and 2,000 sq ft of ground floor retail accommodation, with minimal ancillary space.

For example, when liaising with the two agents currently marketing 155 and 165 Camden High street (both are c.2,000 sq ft), both agents are advising interest/offers have been received. This is clearly a reflection of where market demand currently is, i.e. where the optimum retail floor space (between circa 700 sq ft and 2,000 sq ft) is available, there is some interest from retailers.

As retailers continue to review their store portfolio management strategies, not only will the store's physical characteristics be taken into account, but with the continuing fragmentation of the high street, specific factors such as location and footfall become even more essential. Therefore given the location and size issues of the Subject Premises it is difficult to see where the interest would come from.

Retailing Trends & Retailer's Needs

Traditional stores are becoming increasingly redundant, hence waves of store closures, rising vacancy rates and a raft of retailer administrations and failures.

The high street across the UK is currently undergoing significant structural change. The past 24 months have seen many retailers adopting a Company Voluntary Arrangement (CVA), in order to try and restructure their businesses.

A sustainable or resilient high street is one that adapts to the changing needs and expectations of customers.

The way in which consumers now shop means the retail model is continuing to adapt and evolve to meet new consumer needs and behaviours.

Multi-Channel shopping has become the new normal model for retail, with bricks and mortar stores essentially no longer needing to stock everything, with customers frequently using online routes to order their goods, rather than visiting physical stores as much as they used to.

The High Street will continue to play an important role in the sales process, however with smaller format stores, enabled by frequent direct to store floor deliveries from central warehouses, retailers back of house storage needs have been significantly reduced.

These smaller stores are less expensive to open and run, in terms of rent, business rates, staffing and other general occupancy costs. In addition, they fit into a greater number of urban locations and importantly meet the consumer's multi-channel expectations in the area of click and collect.

In order to survive, it is evident that retailers must adapt to the changing demand on the high street, including successfully realigning their store portfolios, retaining only the most physically efficient stores.

Adapting to change, retailers have included smaller store formats capable of being accommodated within urban centres, examples being (Tesco Express/Metro, Sainsbury's Local, Little Waitrose and Marks & Spencer's Simply Foods formats). In addition, smaller shops from 750 sq ft to 1,500 sq ft remain attractive to smaller brands and independent traders.

Conclusions

This report has demonstrated that there is little demand in the Subject Premises' locality for 1st floor retail in general, units typical to that of the Subject Premises in terms of overall size across two floors (circa 11,831 sq ft), and ground floor units typical to that of the Subject Premises (circa 6,113 sq ft).

This report has further demonstrated that demand in the Subject Premises' locality is typically for smaller units of circa 1,500 sq ft.

Appendix C – Statement of Need

Spyros Petoussis
Demar (BVI) Holdings Limited
27 Mortimer Street
London
W1T 3BL

10 June 2019

Hub by Premier Inn, High Street, Camden.

Introduction

We write to provide some supporting information in respect of the preparation of a planning application at 115-119 Camden High Street for a mixed-use development, to include a Hub by Premier Inn Hotel.

Whitbread are now under contract with Demar (BVI) Holdings for the delivery of an 80 bed Hub hotel at 115-119 Camden High Street.

Whitbread and Premier Inn

Whitbread are a FTSE 100 company that has been trading for over 275 years. We operate the UK's leading hotel brand, Premier Inn. We employ circa 50,000 people and serve around 27 million customers per year, we currently operate 785 hotels with circa 72,000 rooms.

Hub by Premier Inn

Hub by Premier Inn is the latest concept in city centre hotels from Whitbread, introduced as part of the Premier Inn portfolio in 2014. Hub hotels are compact, contemporary and connected; and an innovation in high quality, great value hotel design and are all about taking the comfort, convenience and consistency of Premier Inn and putting it into a smaller, wholly functional package.

Features of hub by Primer Inn hotels include:

- Provides rooms at an affordable price in connected, central locations with high footfall;
- Offers contemporary style combined with excellent connectivity;
- Space-efficient design with compact bedrooms meticulously designed around guests needs;
- Modern food and beverage lounge area;
- Successful format which appeals to business and leisure travellers;
- Very positive guest feedback and Trip Advisor scores.

There are currently seven hub hotels open and operational in London, with a further three hotels open and operational in Edinburgh. The operational hub hotels in London are as follows:

- Covent Garden – 163 rooms;
- Tower Bridge – 112 rooms
- Goodge Street – 168 rooms;
- Kings Cross – 389 rooms;
- Spitalfields, Brick Lane – 189 rooms;
- Westminster, St James Park –137 rooms;

- Westminster, Westminster Abbey – 320 rooms.

As evidenced above, hub hotels open in London range in size from the smallest hotel, in Tower Bridge, with 112 rooms, to the largest hotel providing 389 rooms in Kings Cross. The average operational London hub hotel size is 211 rooms.

While each individual hub hotel is appraised financially on its specific operational and locational circumstances, in order to achieve a workable scheme, the financial model for each hotel must assess: the achievable room rate for each location; the fixed associated overhead costs; and establish the required profit margin in order to ensure that each hotel is viable.

Hub at 115-119 Camden High Street

The site at 115-119 Camden High Street is a desirable location for hub by Primer Inn which meets the central London (Zone 1 and 2) and high footfall locational requirements. It is a target location for Whitbread and we are excited by the opportunity to establish a new, high quality contemporary hub hotel in this location.

In this regard we are committed to investing in a high quality design suitable for the surrounding context, which we consider will benefit this site and Camden High Street. Nonetheless, as with all our hub hotels, we must achieve a certain critical mass of rooms on site to ensure that the hotel has the ability to make a certain level of return and make a contribution to Central Overheads. In respect of 115-119 Camden High Street and the hub hotel model, the minimum number of rooms required to generate sufficient revenue to achieve the minimum viable hurdle rate is 80 rooms, and the fixed overhead costs associated with a hotel of fewer than 80 rooms would become disproportionate to the achievable room rate in this location. As such, there would be insufficient room revenue required to break even in a hotel smaller than this required room count. The fixed costs involved relate to Fixtures, Fittings and Equipment, marketing and promotional support, central head office costs contribution and pre-opening set up costs, together with working capital to establish and run the hotel prior to revenue streams commencing.

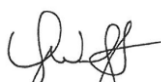
Once established, there are base labour costs required to run the hotel irrespective of the room count.

Hub hotels have experience of assessing many opportunities across London and their view on viability is borne out of this experience. A hotel model of 80 rooms, as proposed at the site, would be our smallest model in London.

While this 80-bedroom model still remains a challenge to obtain attractive returns, in special circumstances, such as in Camden High Street where centres are attractive and fit well with the brand profile, then Hub hotels are prepared to invest and make the commitment.

We look forward to working with Demar (BVI) Holdings on this exciting project which will regenerate and provide vibrancy to this site, creating 35 direct new hotel associated jobs, as well as additional indirect jobs and considerable economic spin off benefits to the local area.

Regards



Louise Woodruff

Acquisitions Manager – London

Whitbread Group PLC

Whitbread Court, Houghton Hall Business Park
Porz Avenue, Dunstable, Bedfordshire, LU5 5XE
T +44 (0) 1582 424200 www.whitbread.co.uk

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Registered Office: Whitbread Court Houghton Hall Business Park Porz Avenue Dunstable Bedfordshire LU5 5XE