



5-17 HAVERSTOCK HILL

Planning Statement

November 2020

CONTENTS

1.0 Executive Summary	2
2.0 Introduction	5
3.0 Site and Surroundings	7
4.0 Planning History	9
5.0 Proposals	12
6.0 Pre-Application Advice and Consultation	18
7.0 Planning Policy Overview	22
8.0 Planning Assessment	25
9.0 Planning Obligations and CIL	46
10.0 Summary and Conclusion	48

APPENDICES

Appendix A - Relevant Planning Policies	50
Appendix B – Affordable Housing Statement	65

1.0 Executive Summary

THE SITE

- 1.1 The Site currently comprises a purpose-built six storey car garage constructed in the 1930s, which is known as 'Eton Garage'. The site is bounded by Haverstock Hill to the north and Adelaide Road to the South and is immediately west of Camden Town Centre. Immediately adjacent to the Site is the Grade II Listed Chalk Farm London Underground Station. The building, which occupies the entirety of the site, was most recently used by the Metropolitan Police as a car storage facility. At ground floor level fronting onto Adelaide Road is a parade of retail units, a number of these are now also vacant.

PLANNING HISTORY

- 1.2 Planning permission was previously granted in 2018 for a residential-led mixed use development delivering 77 units of which 17 were affordable housing (8 social rented and 9 intermediate units). The planning history of the site is elaborated on in Section 4.0 of this planning statement.

PROPOSALS

- 1.3 The proposed development comprises a high-quality mixed-use development incorporating 35 residential units (use class C3) including 18 social-affordable units and 17 market units, the residential units are located in the eastern building fronting Adelaide Road. A key difference to the 2018 permission is that all of the affordable housing units would be for social-affordable rent. On the western side of the scheme fronting onto Haverstock Hill is a high quality, hotel offering 118 hotel bedrooms (use class C1). At the ground floor is a lobby area with a restaurant space, to be let separately to the hotel. Integrated within the development at ground floor on Adelaide Road are two further commercial units intended for retail/café use (Class E).

LAND USE

- 1.4 The Camden Local Plan expresses strong support for tourist development and visitor accommodation. It recognises that local tourist and cultural attractions will benefit from the support that hotel accommodation can provide. Unlike 'tourist development' there is no specific policy requirement that visitor accommodation must be of a certain size. However, it is clear that in policy terms, hotel proposals should be appropriate to its location.
- 1.5 The proposed hotel is a modest, and importantly, a viable size, delivering high-quality rooms which will provide much needed support to the tourist attractions and economy within Chalk Farm as well as local employment opportunities. It would not be a visitor attraction in its own right and therefore is not limited by the 1000sqm threshold noted in the Local Plan (para 5.58). The hotel is a critical element to the proposed land use mix and essentially allows for the residential, and in particular the social rented affordable homes, to be delivered.
- 1.6 The scheme is compliant with the London Borough of Camden's Mixed-Use Policy providing in excess of 50% housing on a floorspace basis, based upon the proposed uplift. The scheme provides 35 residential dwellings alongside the proposed hotel use. The scheme is delivering 54% social-affordable housing (on a floorspace basis) with a focus on family sized accommodation (2-Bed homes and above), with 13 out of 18 social-affordable units being family sized, which is again in excess of the requirements as dictated by both the Mixed-Use and Affordable Housing policies respectively.

1.0 Executive Summary

- 1.7 The co-location of these uses provides a vibrant development which will activate either side of the proposed scheme providing an attractive and welcome addition to this area of Camden.

RESIDENTIAL STANDARDS

- 1.8 The proposals improve upon the residential standards set by the extant consent which included more single aspect units. This was particularly notable in the affordable housing units that were both single aspect and north facing. This was regrettable and the new proposals have sought to improve the aspect and quality of these affordable homes.

ARCHITECTURE AND DESIGN

- 1.9 Sheppard Robson architects are a Camden based practice who have an excellent track record in delivering exceptional quality hotels across London. The proposed massing mimics the previously permitted scheme and sits comfortably on the site. It is split into two distinct buildings fronting two roads and will be read as mansion blocks, with clear visibility between the buildings allowing appreciation of the adjacent station building which retains its prominence in long views.
- 1.10 The local vernacular is mixed with a variety of architectural styles in the immediate surroundings of the site. The proposed development will be predominantly brick in a lighter salmon tone with further detailing that picks up upon the ox-blood red tiling on the adjacent station.
- 1.11 Sheppard Robson's expertise has resulted in the delivery of a high-quality scheme which is considered to be a positive addition to the local townscape, and which provides a complimentary back drop to the Grade II Listed Station.

LANDSCAPE AND PUBLIC REALM

- 1.12 The development will deliver two distinct areas of open space.
- 1.13 At fifth floor roof level, a large area of landscaped open and play space is located for the sole use of the residents. The space is considered to provide a higher quality and better located open space than the space which was proposed under the extant planning consent.
- 1.14 At ground floor level, accessed from Adelaide Road is an external courtyard designed to provide year-round greening through a mix of evergreen and architectural plants. The courtyard will be accessible to the public and will provide seating and an 'oasis' for local residents and hotel guests alike to enjoy.

TRANSPORT

- 1.15 The site is highly accessible being located adjacent to Chalk Farm Underground Station with Northern line services running frequently into Central London. A number of bus routes run directly adjacent to the site and further a wide range of activities and amenities are located within a short walking distance of the site. As such the scheme is proposed to be car-free for both the residential element and the hotel. Cycle parking will be provided in line with the relevant standards and incorporated into the development.
- 1.16 The proposed development delivers a highly sustainable development which provides access to sustainable modes of transport which will further encourage modal shift.

1.0 Executive Summary

IN SUMMARY

- 1.17 In summary, the proposals provide a high-quality mixed-use development located at a key transitional node within the London Borough of Camden. The scheme will deliver housing to compliment the predominant uses to the north and further to Belsize Park whilst also delivering a hotel which will enliven a currently inactive and tired frontage on Haverstock Hill. The scheme will deliver economic, social and townscape benefits to this area within Camden and is of an appropriate size and design to its context.
- 1.18 Specifically, the proposed development is considered to accord with a number of policies at a National, Regional and Local level and will provide the following key benefits:
- Delivery of 18 affordable homes all of which will be Social-Affordable Rented;
 - Delivery of 17 Market units which will contribute to creating a mixed and inclusive community;
 - Provision of a 118-bedroom hotel offer, that assist with the viability of the residential element of the proposals and supports Camden tourism attractions and provides local employment opportunities;
 - Enlivening of two currently inactive and tired frontages through the creation of three distinct town centre spaces, creating a vibrant use at ground floor.
 - Creation of a new public courtyard space, providing an 'oasis' away from the bustle of Camden Town.
 - Significant local job creation through construction and operational phases of development.

2.0 Introduction

- 2.1 This Planning Statement has been prepared by CBRE Ltd ('CBRE') on behalf of OD Camden Hotels Ltd (hereafter 'the applicant'). The purpose of this document is to explain the background to the proposals, describe the nature of the site, set out the planning policies and demonstrate how the application responds to these.
- 2.2 This Planning Statement should be read in conjunction with the following set of supporting documentation:
- Completed Planning Application Form and Certificate B (CBRE, November 2020)
 - Planning Statement (CBRE, November 2020) including:
 - Affordable Housing Statement (CBRE, November 2020)
 - Community Infrastructure Levy (CIL) Additional Information Form (CBRE, November 2020)
 - Design and Access Statement (Sheppard Robson, November 2020) with the following documents appended:
 - Landscape Strategy and Plans (Prepared by RBMP, November 2020).
 - Site Location Plan, Existing and Proposed Plans, Sections and Elevations (Sheppard Robson, November 2020)
 - Townscape, Heritage and Visual Impact Assessment (Peter Stewart Consultancy, November 2020).
 - Landscaping Strategy and Plans (RBMP, November 2020)
 - Noise and Vibration Impact Assessment (Adnitt Acoustics, November 2020)
 - Air Quality Assessment (Eight Associates, November 2020)
 - Preliminary Ecological Appraisal (DF Clark, November 2020)
 - Bat Emergence Survey (DF Clark, November 2020)
 - Draft Construction Management Plan (McAleer and Rushe, November 2020)
 - Energy Statement (Quinn Ross, November 2020)
 - Flood Risk Assessment and Sustainable Drainage Systems (SuDs) Strategy (ARUP, November 2020)
 - Daylight and Sunlight Assessment (Point 2, November 2020)
 - Sustainability Statement and BREEAM Pre-Assessment (Quinn Ross, November 2020)
 - Transport Assessment (WSP, November 2020)
 - Delivery and Servicing Management Plan (WSP, November 2020)
 - Draft Travel Plan (WSP, November 2020)
 - Waste Management Strategy (WSP, November 2020)
 - Arboricultural Assessment (Greengage, November 2020)
 - Health Impact Assessment (Greengage, November 2020)
 - Statement of Community Involvement (Kanda, November 2020)
 - Security Needs Assessment (QCIC, November 2020).
 - Access Statement (Buro Happold, November 2020).

2.0 Introduction

- Site Investigation and Basement Impact Assessment (ARUP, November 2020)
 - Land Contamination Preliminary Risk Assessment (ARUP, November 2020).
 - Lighting Assessment (Quinn Ross, November 2020).
 - Overheating Assessment (Quinn Ross, November 2020).
 - Haverstock Hill Hotel Economic Benefits Statement (Hatch Regeneris, November 2020)
- 2.3 Planning policy and guidance at all levels recommends early engagement and consultation with key stakeholders in the planning process as well as the local community. Together with a series of consultation meetings with key stakeholders, the applicant (OD Camden Hotel Ltd) has been in detailed discussion with the Local Planning Authority ('LPA') to enable collaborative engagement. The proposals have been positively shaped through this engagement and this Statement provides a summary of this engagement.
- 2.4 This statement is structured as follows:
- **Section 3.0** sets out a summary of the site and the surroundings;
 - **Section 4.0** provides a review of the site planning history and also provides details of recent surrounding applications which are considered to be of relevance to this application;
 - **Section 5.0** details the proposals for the site;
 - **Section 6.0** provides a summary of the engagement that has been held with LBC and other stakeholders and includes a summary of the key discussion points and how comments have been responded to;
 - **Section 7.0** summarises the planning policy context for the site;
 - **Section 8.0** sets out the key planning issues when assessed against the local development framework and relevant policies;
 - **Section 9.0** provides a summary of the likely Planning Obligations and CIL; and,
 - **Section 10** sets out the summary and conclusion.

3.0 Site and Surroundings

THE SITE

- 3.1 The application site occupies an area of 0.207ha, and is located at the northern end of Chalk Farm Road.
- 3.2 The site is bound to the north by Haverstock Hill; Chalk Farm Underground Station (Grade II Listed) is located immediately to the east. To the south of the site is Adelaide Road, with the western boundary abutting residential properties known as 'Eton Mansions'. The site is located at a key intersection at the junction of Chalk Farm Road, Haverstock Hill and Adelaide Road.
- 3.3 The site currently comprises a single building which is a six-storey purpose-built car garage (Sui Generis) constructed in the 1930s. The building was designed as the residential parking garage for the neighbouring Eton Mansions and as such the external envelope appears to be residential in nature mirroring the style of the residences to the west. The site also comprised a motor show room and petrol station (which is no longer on site).
- 3.4 Included within the footprint of the building is a small retail parade fronting onto Adelaide Road, this parade includes a number of small retail units which have been in a range of town centre uses but are now predominantly vacant.
- 3.5 The building has been in continual use since its construction and the car garage was most recently in use by the Police who utilised the property for the storage of vehicles involved in crime until 2014. Whilst the car garage has been vacant since that time the retail units on Adelaide Road have continued to be in use.
- 3.6 The site is located at a transitional point at the end of Chalk Farm Road, immediately east is Camden Town Centre which has a commercial and town centre emphasis and is a key attractor of domestic and international tourism for the Borough. To the west of the site there is a predominance of residential properties in a range of styles and typologies as the area transitions from Camden Town Centre, to Belsize Park and Primrose Hill.
- 3.7 The main access to the site is located on the western boundary with vehicular and pedestrian access off Adelaide Road, adjacent to the existing retail parade. Pedestrian access to the site is also gained from Haverstock Hill.
- 3.8 The site is not located within a Conservation Area; however, it is in close proximity to adjacent Conservation Areas (Eton, directly west and Primrose Hill, directly south). The site is immediately adjacent to and abuts Chalk Farm Underground Station which is a Grade II Listed Building.
- 3.9 The site is very well connected and has a PTAL level of 6a (excellent). It is located immediately adjacent to Chalk Farm Station which is serviced by the Northern Line (Edgware Branch). There are a number of bus stops on both Haverstock Hill and Adelaide Road, which are immediately adjacent to the site.
- 3.10 Due to its long term, mostly vacant, nature, the site has unfortunately become unkempt and detracts from the local street scene and adjacent Conservation Areas and the Grade II Listed Station, and the setting of the Grade II* Listed Roundhouse. This is particularly evident at ground floor where the poor-quality shopfronts facing onto Adelaide Road have a harmful effect upon the appearance of the adjacent listed station, likewise the void on Haverstock Hill detracts from the vitality of the area.
- 3.11 The building overall is considered to make a negative contribution to this part of Chalk Farm both in terms of design and architecture and in relation to land use. It has a negative impact on the setting of the adjacent conservation areas, Grade II Listed Underground

3.0 Site and Surroundings

Station and the Grade II* Listed Roundhouse. The site as currently developed does not contribute positively to the streetscape or make efficient use of the land.

- 3.12 The site is subject to the following planning designations:
- Adelaide Road Frontage – Neighbourhood Parade; and,
 - Adjacent to Grade II Listed Chalk Farm Station.

SURROUNDING AREA

- 3.13 The site is located within the Haverstock Ward at a transitional point between Camden Town and Belsize Park/Primrose Hill.
- 3.14 To the east of the site is Camden Town Centre, which is an international node providing transport connections, world famous markets (The Stables and Camden Lock Markets) along with town centre uses including restaurants, retail and bars which creates a vibrant and healthy town centre. To the west of the site is Belsize Park and Primrose Hill, providing a residential context. The site located at the intersection of these uses plays a key role in transitioning from the town centre to the residential neighbourhoods beyond.
- 3.15 There is no predominant land use in the surrounding area to the site. Alongside the town centre and residential uses, there are a range of cultural (The Roundhouse) and educational institutions in close proximity on Chalk Farm Road and Haverstock Hill respectively.
- 3.16 In general, with the exception of the Underground Station which was notably constructed with the intention for future storeys to be added above it, the architectural character of the surrounding area, like the site itself, is one of substantial mansion blocks. As one moves further towards Camden High Street the height of buildings remains varied but at a generally lower number of storeys with some notable exceptions. Similarly, there is a variance in terms of the design, style and uses of buildings.
- 3.17 To the east of the site within Camden Town there is limited open space, however the site is in close proximity to Primrose Hill which can be reached within a five minute walk and the Regent's Canal (part of the London Blue Ribbon Network) is also within a ten minute walking time.

4.0 Planning History

- 4.1 This section provides an overview of the site's planning history and any notable relevant developments within the immediate surrounding areas.
- 4.2 This information has been obtained from records available from the London Borough of Camden's online planning applications register.

THE SITE

- 4.3 The online search facility for the Camden Council archives provides a record of planning applications post 1947. As noted previously, the building occupying the site of 5-17 Haverstock Hill was constructed in the 1930s. It has therefore not been possible to identify the original planning application documents.
- 4.4 There is a limited planning history for the site prior to 2018, with very little development having taken place on the site since the original construction which is of relevance to this planning application.
- 4.5 In October 2018, the LB Camden granted planning permission (reference: 2016/3975/P) for the following development:

"Demolition of existing building and erection of a part-six, part-seven storey development comprising 77 residential units (8 x studio, 18 x 1-Bed, 32 x 2-Bed and 19 x 3-Bed units) (Use Class C3) and retail (Use Class A1-A5) use at ground floor with associated cycle parking, amenity space, refuse and recycling store and associated works."
- 4.6 The permission secured consent for the comprehensive redevelopment of the site delivering a residential-led mixed use scheme. The development comprised the demolition of all existing buildings on site and their replacement with a part-six, part-seven storey building which would deliver 77 residential units with 22% on-site affordable housing being delivered.



Figure 1: Approved Scheme (2016/3975/P)

- 4.7 The permitted development included 17 (22%) affordable homes. The affordable housing comprises a mix of affordable and intermediate rented products. These units were located

4.0 Planning History

to the rear of the site adjacent to the existing residential properties on the western boundary.

- 4.8 The scheme was also included 284sqm of ground floor retail floorspace fronting onto Adelaide Road across three small scale units (A1-A5 Use Class).

SURROUNDING SITES

- 4.9 Camden Town and the surrounding area is undergoing significant change and is a key location for growth within LB Camden and London. There have been a number of recent and notable applications (see Table 1 below) in the vicinity of the site and these have catalysed the change of character in the area and will continue to do so.

Application Site	Application Reference	Description	Status
115 Camden High Street	2019/3138/P	Demolition of existing two storey building and erection of a part-four, part-five storey building (plus enlargement of existing basement and plant room at roof level) comprising retail (Class A1) at ground floor level fronting Camden High Street, 80-bed hotel (Class C1) and 3 x 2-bed residential units (social rented) (Class C3) fronting Delancey Street.	Resolution to grant planning consent subject to conditions and s106 agreement (December 2019).
100 Chalk Farm Road	2019/5407/P	Temporary change of use from office (B1a) to a 25-bed cold weather shelter (Sui Generis) for EEA national rough sleepers until 31 March 2020.	Approved 25-11-2019 <i>(This context has now expired)</i>
Morrisons Superstore and Petrol Filling Station Camden Goods Yard Chalk Farm Road	2017/3847/P (subsequently amended 2020/0034/P)	Comprehensive redevelopment of the site. Redevelopment includes a new food store and petrol filling station along with commercial floorspace, residential units (up to 573 units), retail and a community centre (Use Class D2). <i>(Please note this is not the full description of development).</i>	Approved 18-07-2018

4.0 Planning History

4-8 Haverstock Hill (Marine ices)	2015/0487/P	Demolition of existing buildings with retention of façade at 45-47 Crogsland Road and construction of a part 4/part 5 storey building with basement comprising flexible use of cinema (class D2) at basement and ground level with ancillary restaurant and bar (class A3/A4) at ground level or retail class (class A1 at basement and ground floor level and 19 residential dwellings (8 x 1 bed, 9 x 2 bed and 2 x 3 bed units) on upper floors with associated cycle parking, amenity space and refuse and recycling storage.	Approved 22-12-2016. Development has commenced on site and the scheme is substantially completed.
Vacant site adjacent to no 11 Crogsland Road London NW1 8HF	2015/0921/P	Redevelopment of vacant site by the erection of a 6-storey building comprising a day centre (Class D1) on the ground floor and 38 extra-care residential flats (Class C3) on the upper floors, plus roof terraces, communal gardens and minibuses parking.	Approved. 07-07-2016. Development has commenced on site and the scheme is substantially completed.

Table 1: Surrounding Planning History

- 4.13 Of particular note, the redevelopment of The Morrison's supermarket site at Camden Goods Yard will be a significant development providing up to 573 new homes including on-site affordable homes. The development has not yet started on site, but the developer Berkeley Group has indicated its intention to progress construction.
- 4.14 Equally notable is the approval at 115-119 Camden High Street (2019/3138/P) for a Premier Inn Hotel. The site is also located outside of the Central Activities Zone, within Camden Town Centre. The development comprises a hotel which would provide 80 bedrooms, across 2,343sqm of floorspace, three residential units and a small retail offer (156sqm).

5.0 Proposals

OVERVIEW

- 5.1 This planning application proposes the comprehensive redevelopment of the site, including the demolition of the existing building and its redevelopment to provide a mixed-use building including hotel (Use Class C1), residential (Use Class C3) and a range of active ground floor uses including restaurant, café and retail (Use Class E).
- 5.2 The aim is to create a very high-quality architectural response to the context of the site that is respectful of the previously permitted massing and delivers a mix of uses that are needed, deliverable and reflect the character of this part of Camden Town Centre and Chalk Farm. A key aim of the proposals is to reactivate the frontages with fit for purpose commercial uses that will add positively to the street scene in a way that both the existing units and the permitted scheme failed to do.
- 5.3 The application seeks permission for:

“Demolition of existing building and erection of a mixed-use development comprising residential (Use Class C3), Hotel (Use Class C1) and associated commercial, business and service use (formally known as Class A1 and A3) (Class E), with associated works”.
- 5.4 The proposals comprise the following:
 - The redevelopment of a currently vacant car parking facility which is redundant and no longer creates and active use for the site;
 - Provision of a 118 key high-quality hotel conveniently located adjacent to Chalk Farm Underground and key tourist attractions such as The Roundhouse, Camden Lock Market and Primrose Hill;
 - The provision of 35 high quality residential units;
 - On-site provision of 18 social-affordable housing units with an emphasis on the delivery of family sized accommodation;
 - Creation of circa 92 full time equivalent jobs on-site with £3.5m GVA generated through on-site jobs at operational stage;
 - 155 construction jobs created on average per annum, based upon a 2.6 year build period;
 - Delivery of a roof level residential amenity space with a dedicated children’s play area;
 - The provision of a large proportion of active ground floor space in a range of town centre uses including restaurant, café and retail floorspace; and,
 - A high-quality development with architecture and design which compliments the surrounding area and restores prominence to the Grade II Listed Station adjacent.

5.0 Proposals

5.5 The development proposals comprise the following:

Use	Existing Floorspace	Proposed Floorspace	Difference (GIA)
	GIA	GIA	
Sui Generis	7,259.6sqm	0	-7,259.6sqm
Retail (Use Class A1-A3/Class E)*	406sqm	651sqm	+245sqm
Hotel (Use Class C1)	0sqm	4,033sqm	+4,033sqm
Residential (Use Class C3)	0sqm	3,705sqm	+3,705sqm
Plant/Ancillary		399sqm	+399sqm

Table 2: Floorspace Breakdown

**Please note that this figure is inclusive of the units on Adelaide Road along with the Food and Beverage and lobby space within the hotel building.*

5.6 The overall floorspace uplift on the site is 1,528.4sqm (GIA) inclusive of the land uses and floor areas set out within Table 2 above.

Hotel

- 5.7 The Hotel element of the scheme is located in the seven-storey element of the building fronting onto Haverstock Hill. The hotel will deliver 118 rooms including 12 accessible rooms. It can be accessed either from Adelaide Road via an external courtyard or Haverstock Hill. The two entrances connect into a spacious hotel lobby area on the ground floor. The lobby areas, in addition to providing hotel concierge and check in services will also include a food and beverage offer (see below for more detail).
- 5.8 The applicant (OD Camden Hotel Ltd) who will also operate the hotel is a Spanish company who is seeking to open its first UK site in London. It operates across Spain and has a comparable hotel to the application site in Barcelona. The Barcelona hotel is the model for the Chalk Farm project. It prides itself on the quality of its design and service and the strength of its relationship with its surrounding community. That relationship is notably different to those often found in the UK. For OD Camden Hotel Ltd, its neighbours are its customers who value the quality and amenity that their large lounges and café spaces bring as well as the events that the hotel curates throughout the year.
- 5.9 The applicant's attraction to Haverstock Hill was the ability of guests to arrive by the Underground, the enlivening that the surrounding population would bring to its public areas and also the connections that it could make to the Roundhouse in particular. Music in all forms, as well as design and sustainability, is a passion of the group and the hotel will be a valued supporter of the local cultural community.
- 5.10 The hotel will offer high-quality visitor accommodation that currently does not exist within the local area. The rooms will have a contemporary appearance and guests are the driving purpose of the hotel as opposed to some who overtly focus on their restaurant or bar

5.0 Proposals

functions. For this operator their purpose, in their words, is to ‘sell sleep’ which is a good indication of their desire to be a respectful and neighbourly addition to the local community.

- 5.11 With the above neighbourliness in mind, the back of house functions has been fully thought through and the servicing route and facilities to the rear of the building are both screened and enclosed. Servicing for the hotel will be via Adelaide Road and vehicles will exit onto Haverstock Hill.
- 5.12 In terms of refuse collection, a dedicated refuse storage area is provided within the building. This will include general waste and separate recycling bins. The hotel facilities management team will take the bins at the specific dedicated time to the collection point for pick up by Camden’s commercial waste team.
- 5.13 A transport assessment has been submitted in support of this application and provides the full details of the transport requirements and impacts of the scheme. The cycle parking is being delivered in line with the relevant standards at shower and locker facilities are provided for staff at the hotel.
- 5.14 Plant for both the residential and hotel uses are contained within screened plant areas at roof level which is pulled back from the parapet so as not to be visible.

Residential

- 5.15 The residential element of the scheme is located in the western building fronting onto Adelaide Road. Adelaide Road is considered to be the more residential road adjacent to the site and therefore the addition of residential accommodation in this location will be complementary to the surrounding area.
- 5.16 The residential component of the development delivers 35 residential units in total comprising 17 market units and 18 social-affordable units. The proposed residential includes a mix of dwelling sizes in order to meet the local needs and requirements with an emphasis on family sized units. The total quantum of floorspace to be provided as residential is 3,705sqm (GIA).

Unit Size	Tenure and Quantum		Percentage of Units
	Market	Social-Affordable	
1 Bedroom	6	5	31.4%
2 Bedroom	8	5	37.1%
3 Bedroom	3	8	31.4%
Total	17	18	100%

Table 3: Residential Size Mix

- 5.18 The residential development will be accessed solely from Adelaide Road via two tenure blind entrances.
- 5.19 There are proposed to be four (10%) wheelchair user dwellings within the development located across the tenures.
- 5.20 All units include access to a private amenity space in the form of a balcony which is compliant with the London Plan requirements in terms of size. In addition, a 37.5sqm communal roof

5.0 Proposals

terrace area has been provided on the rear building, which also provides children's play space.

- 5.21 Cycle parking spaces are provided in two dedicated stores, again to London Plan standards. The development will be car free and the applicant is happy to agree to a condition and S106 term to that effect.
- 5.22 Residential bin stores are provided internally for the development and accessed via the main stair to each core. Both tenures have appropriately sized, located and ventilated storage area with bins separated for waste types. From these stores the bins would be taken to a collection point (less than 10m away) on Adelaide Road for weekly collection by the Council's contractor.
- 5.23 Given the planning history of the site, it is important to explain that previous permission included 17 affordable housing units across social rented and intermediate tenure. The proposed units included 59.7% single aspect units and included units to the rear of the site, which the Planning Committee felt did not provide the high quality of residential amenity that should be delivered. In addition, the scheme, was providing only 22% affordable housing against a target of 40% which is a significant shortfall.

Town Centre Uses (Class E)

- 5.24 A fundamental component of the proposals is the inclusion of uses which will activate the frontages on both Adelaide Road and Haverstock Hill and which will be complementary to the proposed uses on site and neighbours.
- 5.25 The proposals include two units at ground floor fronting onto Adelaide Road, both of these units are appropriately sized and are accessed directly from Adelaide Road. It is indicatively identified that these will be in Café and Retail Use and the application seeks consent under Use Class E. Both units would be defined as Class E under the Use Classes Order as recently amended and the applicant would wish to maintain the flexibility of this use class. Given the size of the units, it is not anticipated that there would be any conflict with any amenity or land use policies, but the applicant is happy to accept a limitation on no primary cooking on the premises.
- 5.26 The Haverstock Hill frontage has been significantly activated by the proposals with the ground floor being predominantly hotel lobby space which incorporates a large area of restaurant/café use. It is the intention of the applicant that the restaurant space on Haverstock Hill is let separately and therefore will function independently of the hotel.

Design and Architecture

- 5.27 The development is proposed to be part-six, part-seven storeys and importantly the bulk and massing has remained within the envelope of the scheme previously consented in 2018. The height of the building is also in broad accordance with the previous scheme albeit minor changes have been incorporated in order to accommodate the proposed land uses. The edges of the site are defined by three distinct buildings that, whilst separate, share underlying attributes to create a cohesive form and massing.
- 5.28 The site is a unique island site with two major routes on the east and west boundary being anchored by the prominent Grade II Listed station on the corner. Sheppard Robson have designed a harmonious composition of three buildings which will define the edges of the site creating active street frontages whilst presenting a complementary back drop to the prominent station.

5.0 Proposals

- 5.29 The ground floor has been designed to be as open, transparent and permeable as possible to fully integrate the development into the local neighbourhood. The Courtyard is proposed as an extension of the lobby space providing an external welcoming environment for hotel guests and local residents.
- 5.30 The proposed palette of materials includes brick predominantly in a lighter salmon tone on the hotel and residential flanks on Adelaide Road and Haverstock Hill with a darker red tone on the linking building to the rear. Secondary materials include pre-cast concrete with highlights provided by glazed terracotta to tie back into the adjacent station.

Landscaping

- 5.31 In addition to the provision of private terraces and the roof top amenity space, the application will provide a courtyard area associated with the hotel that will be publicly accessible. This will be a carefully managed area with hard surfaces and planting.

Sustainability and Energy

- 5.32 The sustainability measures within the proposals are of particular importance to this applicant. The design of the scheme has holistically incorporated sustainability principles. The building has been designed to incorporate an optimised energy efficient design which will reduce the energy demand of the development. The proposed building fabric will include the use of local and sustainable materials which will be of the highest quality.
- 5.33 The proposals include the addition of Photovoltaics (PVs) and Air Source Heat Pumps (ASHP) which will seek to further reduce the CO2 emissions of the scheme. The proposals maximise the use of green roofs to assist with sustainable drainage, overheating and air quality as well as adding to local ecological biodiversity.
- 5.34 The BREEAM New Construction pre-assessment that accompanies the application shows a rating of 'Excellent' being targeted for the scheme.

Transport

- 5.35 The proposed development will be car free, for both the residential and the hotel elements and will deliver cycle parking in accordance with the standards set out in the Intend to Publish London Plan (ItPLP).
- 5.36 The proposed long-stay cycle parking for the commercial uses is located at ground floor level and provides space sufficient for the required cycle parking which is a total of 10 spaces. Parking for accessible cycles will be delivered at 5% of the overall long-stay provision. Lockers and showers for staff will be included. Short-stay cycle parking associated with these uses, a total of 34 spaces will be provided around the site perimeter on the footway.
- 5.37 The residential cycle parking is located in a separate store at ground floor level and will provide the required long and short stay cycle parking spaces, which is a total of 65 spaces. As with the commercial uses, 5% provision will be made for accessible spaces.
- 5.38 Taxi trips associated with the proposed hotel use will be accommodated on the highway through the existing arrangement on street.
- 5.39 All servicing, deliveries and refuse collection will take place on-site, via the proposed access route to the rear. Vehicles will be guided to enter from Adelaide Road, travel northbound and egress onto Haverstock Hill.

5.0 Proposals

Construction Management Plan

- 5.40 A draft Construction Management Plan has been submitted in support of this application. The applicant is willing to accept an appropriately worded condition in relation to the Management Plan with respect of securing the delivery of the CMP.

6.0 Pre-Application Advice and Consultation

OVERVIEW OF PRE-APPLICATION ADVICE AND CONSULTATION

- 6.1 In bringing forward the Proposed Development, the applicants have consulted extensively with the LPA under a Planning Performance Agreement to ensure that the scheme represents collaborative engagement in the best interests of the local community, LB Camden and the applicants.
- 6.2 Further engagement has also taken place with the Camden Design Review Panel.

CONSULTATION WITH LONDON BOROUGH OF CAMDEN

- 6.3 As part of the evolution of the proposals, the applicants have engaged with LB Camden on a number of occasions, the engagement has focused on a range of matters relating to the development both in terms of the design and technical evolution. The feedback received has been considered and the scheme has sought to evolve and respond; the table below provides a commentary on this engagement.
- 6.4 Meetings were held with Officers as follows:
 - 11 November 2019
 - 12 December 2019
 - 16 April 2020
 - 28 May 2020
- 6.5 The table below provides a summary of the engagement on design and technical matters and represents the final position reached with the LB Camden. The table below is a summary of the most pertinent matters raised during pre-application and is not intended to be exhaustive.

THEME	LB CAMDEN COMMENT	SCHEME RESPONSE
Land Use	A 160-bed hotel of this scale is not considered acceptable outside of Central London.	Following the comments from Officers, the applicant has sought to significantly reduce the scale of the hotel provision which now comprises a 118-bed hotel at a much-reduced scale. It is considered that the hotel is of an appropriate scale and size commensurate to the location. The proposed hotel offer will deliver a significant level of economic benefit to the LB Camden and at the same time is able to deliver 18 social-affordable rented units.
Housing	Following the rationale in relation to Hotel principles, the mixed-use policy would apply.	The scheme has been developed further and as can be seen in Table 5 in Section 8.0 of this report the scheme significantly exceeds the requirements of this policy.
Housing	The proposed unit mix should be in accordance with the Camden Dwelling size priorities.	The priorities have been reviewed in detail and as is set out in Section 8.0 of this report, the proposed scheme is in accordance with the relevant priorities.

6.0 Pre-Application Advice and Consultation

Design	The proposed scheme is for a triangular footprint which takes inspiration from the Chalk Farm Underground Station Building. The new layout creates two blocks which gives rise to the perception of the hotel building (on Haverstock Hill) 'spreading' across the plot.	<p>Following the comments received from the Officers the applicant and design team reviewed the approach to the massing. As will be noted from a review of the Design and Access Statement (Sheppard Robson) the proposed development has reverted (as per the extant) to a rectangular form of accommodation which is considered to more appropriately address the plot and reduces the perception of a building of much greater scale.</p> <p>It should be noted that the proposed development follows the permitted envelope of the extant scheme which was considered acceptable when approved in October 2018.</p>
Design	There is no clear separation of the blocks.	The form of the buildings has been reviewed and there is now a clear separation between the residential and hotel buildings as will be seen in the Design and Access Statement and scheme visuals.
Design	The height of the platform building results in visual congestion reducing the prominence of the station building.	The building has been reduced in scale and in views of the Station the building is considered to retain its prominence with the roof level TfL roundel clearly visible.
Design	The proposed residential entrance is considered to be too 'low key' and has no presence.	Sheppard Robson have reviewed the architectural detailing of the entrances and the revised scheme, as submitted, presents a far more prominent entrance which is considered appropriate for the scale of residential development proposed.

LB CAMDEN DESIGN REVIEW PANEL

- 6.6 Given the nature of this site, the proposals have undergone review by the LB Camden Design Review Panel.
- 6.7 We engaged with the Design Review Panel on one occasion during a meeting that took place on Friday 11 September (via video conference) in relation to the proposals for the site. Generally, the panel felt that the proposals had the potential to enhance the area, but requested design amendments to avoid impacts on Chalk Farm Station. The applicant team have subsequently taken these comments on board and significant changes have been made to the scheme to address concerns raised.
- 6.8 The letter from the DRP also acknowledges that Camden Council supports the proposals to demolish the existing vacant six-storey car parking facility and redevelop with a mixed use scheme.
- 6.9 The following table provides a summary of the main points included within the feedback letter received from the Panel sessions, these comments have been considered and incorporated as far as possible into the proposals. Additional commentary on the Design Review Panel engagement is presented within the Design and Access Statement.

6.0 Pre-Application Advice and Consultation

THEME	DRP COMMENT	SCHEME RESPONSE
Design Narrative	The panel considers that the building requires a clear design narrative that treats the hotel and residential buildings and the station building (outside of red line) as three distinct elements.	As set out within the Design and Access Statement, whilst all three buildings share an articulation of flush and angled piers, the flank buildings are taller with an appropriately lighter shade of brick that compliments and off-sets the station frontage. The linking building to the rear is to be clad in a darker brick which will define the gap between the buildings.
Design	The proposed gable ends appear too dominant.	These have been refined further with additional glazing and articulation. The hotel gable has been slimmed through the reduction of a stair core.
Design	The design should be developed to create a slimmer impression in views.	These have been refined further with additional glazing and articulation. The hotel gable has been slimmed through the reduction of a stair core.
Materials	The proposed 'tecu' brass is not considered to be the most appropriate material for the site nor appropriate in response to the listed Chalk Farm Station.	The proposed brass has now been removed from the design and alternative materials have been suggested for the 'highlight material' which is now proposed to be glazed terracotta.
Materials	The panel liked the proposed soft red brick and stone banding. Additional analysis of the underground station palette and detail could provide further cues.	Sheppard Robson have returned to site to undertake a more detailed analysis of the colours and materiality of the station. The palette has been refined and the updated materials are presented within the Design and Access Statement.
Layout	The panel welcomed the relationship created between ground floor retail and café space and feel this will enhance the activation of the area.	This has remained in the proposals and the connections have been enhanced further through the development of a public realm scheme.
Landscaping and Public Realm	The panel cautioned against the inclusion of a green wall in the courtyard.	This has been removed.
Quality of Residential	The panel encouraged a review of the proposed residential floorspace to ensure that single aspect units were reduced, and that the quality of units is high.	The design of the residential layouts has been an iterative process and the final scheme is considered to provide the highest quality residential units. Assessments of amenity and other considerations are included within technical assessments submitted with this application.

PUBLIC CONSULTATION

- 6.10 In addition to the comprehensive engagement with the LB Camden, the applicants have also sought to engage with the local community.
- 6.11 Given the current circumstances surrounding Covid-19 and the social distancing restrictions that exist in London, the majority of engagement with residents and the community has taken place virtually.
- 6.12 The focus of the engagement has been a dedicated project website¹ to which members of the local community have been directed via hard copy mail outs and which has been

¹ The website will remain live and can be accessed here - <https://haverstockhillhotel.community/>

6.0 Pre-Application Advice and Consultation

updated frequently to incorporate any scheme amendments and updates. In addition, on 27 October 2020 a virtual consultation took place via MS Team and was attended by up to 15 members of the local community.

- 6.13 The Statement of Community Involvement prepared by Kanda provides more details on the 'at a distance engagement' methodology and the comments and suggestions that were received during the virtual event and through the website.

7.0 Planning Policy Overview

- 7.1 This section provides an overview of the key national, regional, and local planning policies relevant to the application.
- 7.2 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise.
- 7.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.4 The National Planning Policy Framework (NPPF) (February 2019) is a material consideration in the determination of planning applications. In assessing and determining development proposals, the NPPF (2019) sets out that local planning authorities should apply the presumption in favour sustainable development.

DEVELOPMENT PLAN

- 7.5 The Site is located in the London Borough of Camden and as such the statutory development plan comprises the following:
 - The London Plan 2016 (consolidated with alterations since 2011) (January 2017); and,
 - London Borough of Camden Local Plan (2017).
- 7.6 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the Camden Local Plan (2017) is the most recently adopted policy of the above-mentioned development plan, where there is a difference in policy this document takes precedence, although in all cases, where possible, the proposals should seek to achieve the highest defined standards.

EMERGING DEVELOPMENT PLAN

- 7.7 Emerging planning policy can act as a ‘material consideration’ in the determination of planning applications. The weight given to emerging planning policy is based on the stage of the adoption process the document has reached at the time of the application. The Intend to Publish (ItPLP) is the most advanced emerging policy document and decision makers are affording significant weight to the policies within the ItPLP.

National Planning Reforms

- 7.8 The Government announced in July (2020) significant changes to the Use Classes Order in England, which may have wide reaching impacts. The changes came into effect on 1st September 2020.
- 7.9 The changes include the creation of ‘Class E’. This new use class will cover ‘commercial, business and service uses’. Use Classes, shops (A1), financials/ professional services (A2), restaurant (A3), office (B1a-c) indoor sports/ fitness facilities (part of D2), medical or health facilities, creche, day nursery (part of D1) will all fall within the new Class E use.
- 7.10 In addition, the Government have recently consulted on their ‘Planning for the Future’ White Paper, this document which was consulted on until 29 October 2020 set out the Governments aspirations for the Planning System and proposed significant changes. The

7.0 Planning Policy Overview

changes proposed, if accepted, will come into force in 2024 at the earliest and it is considered that this application will have been through the Planning System prior to this.

Intend to Publish London Plan

- 7.11 The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London ("the Mayor") in accordance with the Greater London Authority Act 1999 (as amended) ("the GLA Act") and associated regulations.
- 7.12 The current 2016 Plan (The London Plan consolidated with alterations since 2011) is the adopted Plan, although the Intend to Publish London Plan (2019) (ItPLP) is being given material consideration in planning decisions as it has now gone through Examination in Public. Once adopted, this document will provide a new set of policies to steer development within the Greater London area for the next 20-25 years.
- 7.13 The policies contained within the ItPLP have been considered in detail given the status of the document and the timescales for adoption. The Mayor has considered the Inspectors' recommendations and has issued to the Secretary of State his intention to publish the London Plan. The Secretary of State published some proposed amendments to the Plan on 13 March 2020, which are currently being considered by the Mayor. Therefore, the proposals are also reviewed against these draft policies as well as the changes proposed by the Secretary of State.

Draft Site Allocations Local Plan

- 7.14 LB Camden is currently reviewing the 2013 Site Allocations Plan. The first formal consultation on the Site Allocations Plan was carried out between 13 February and 27 March 2020. Once adopted, this Plan will replace the policies in the 2013 Site Allocations Plan and will be used in conjunction with the other policies in Camden's Development plan to assess new development proposals on key sites and areas.
- 7.15 This document did not contain information relevant to this planning application.

Other Material Considerations

- 1.1 Other material considerations include (inter alia) at the national, London and local levels:

National:

- National Planning Policy Framework (NPPF) ('February 2019');
- National Planning Practice Guidance ('PPG')

London:

- Accessible London: Achieving an inclusive environment (October 2014)
- Character and context (June 2014)
- Planning for equality and diversity in London SPG (October 2007)
- Play and informal recreation SPG (September 2012)
- Sustainable design and construction (April 2014)

Camden:

- Access for All CPG (March 2019)
- Air Quality CPG (March 2019)

7.0 Planning Policy Overview

- Amenity CPG (March 2018)
 - Basements CPG (March 2018)
 - Biodiversity CPG (March 2018)
 - Design CPG (March 2019)
 - Developer Contribution CPG (March 2019)
 - Energy efficiency and adaptation CPG (March 2019)
 - CPG 2 Housing – As Amended March 2019
 - Interim Housing CPG (March 2019)
 - Public Open Space CPG (March 2018)
 - Town Centres and Retail CPG (March 2018)
 - Transport CPG (March 2019)
 - Trees CPG (March 2019)
 - Water and Flooding CPG (March 2019)
- 7.16 The LB Camden recently consulted on updates to their CPG documents. The updates to the CPG documents have not yet been adopted, however where considered appropriate the changes have been referenced in Section 8.0 of this report.
- 7.17 A comprehensive review of planning policies has been undertaken to inform the proposal. **Appendix A** sets out the adopted and emerging policies at national, strategic and local levels that are relevant to the proposals.
- 7.18 Following a review of the key policies as set out above and identified the key matters to be considered in the planning assessment have been identified. These issues are addressed within the next section.

8.0 Planning Assessment

- 8.1 This section provides an assessment of the proposed development in relation to the planning policies and material considerations set out in the previous section and the review contained within **Appendix A**.
- 8.2 The key planning matters for the proposal to be assessed against are:
- Principle of Development
 - Loss of Existing Use (Sui Generis);
 - Principle of a Mixed-Use Development, including review of Hotel, Residential and Town Centre Uses;
 - Residential
 - Housing Tenure and Mix
 - Accessible Homes;
 - Residential Quality.
 - Design (including Scale, Height and Massing)
 - Heritage and Conservation
 - Transport and Access
 - Sustainability and Energy
 - Flood Risk and Drainage
 - Amenity (including daylight/sunlight, noise, and air quality)
 - Landscaping
- 8.3 Each of these sections should be read in conjunction with the relevant report, prepared by specialist consultants, as set out in Section 2.0 above and in support of this application.

PRINCIPLE OF DEVELOPMENT

- 8.4 By virtue of its characteristics and location the site is considered to be entirely appropriate for redevelopment and in accordance with the NPPF Paragraph 118 it is noted that policies and decisions should give substantial weight to the value of using suitable brownfield land such as this.
- 8.5 The proposed development is on currently vacant, underutilised brownfield land in a highly accessible location within the Borough. The proposals will provide a mix of appropriate land uses including housing which is a priority land use for the LB Camden and will contribute to the vitality of the neighbouring Town Centre. It is therefore considered that the principle of redeveloping the site is wholly in accordance with Camden Local Plan Policy G1 (Delivery and Location of Growth).
- 8.6 The site, by nature of being brownfield, on the edge of a town centre and well connected by public transport is prioritised and encouraged for the purposes of redevelopment in order to create successful and sustainable mixed-use places (ItPLP Policy GG2 (Making the best Use of Land)).

8.0 Planning Assessment

Loss of Existing Use

Car Park (Sui Generis)

- 8.7 The site is an existing vacant car garage (Sui Generis), which forms the main use on the site and has been vacant since the Police vacated the property in Summer 2014. The building is vacant and under the previous application on the site (see Section 4.0) it was identified as being in lawful Sui Generis Use. At ground level there are six existing retail units (two of which have been amalgamated), these units have continued to be in periodic use since the British Transport Police vacated the remainder of the building. The Adelaide Road frontage is a designated Neighbourhood Centre and comprises 406sqm of floorspace.
- 8.8 Under the previous application, the LB Camden raised no objection to the loss of the existing car garage use on the site. It was considered that the low employment density, limited office space and the purpose-built nature of the building does not lend itself to refurbishment for alternative uses and therefore the demolition would be acceptable.
- 8.9 Notwithstanding this accepted position on the site, the LB Camden supports the redevelopment of existing car parks for alternative uses (Policy T2, Parking and Car-Free Development) therefore the loss of the existing car park is in accordance with policy.
- 8.10 The proposed development includes Class E² floorspace on both the Haverstock Hill frontage and the Adelaide Road frontage. This floorspace has been designed to be flexible with the ability to accommodate a range of town centre uses.
- 8.11 Whilst the number of units will be reduced through the proposed redevelopment, the quantum of Class E floorspace will increase by 245sqm across the three proposed units. In line with Policy TC2 (Camden's centres and other shopping areas) this provision is considered to ensure that there is no harm to the function, character or success of the Neighbourhood Centre.

It is considered that the loss of the car parking facility and retail on this site remains acceptable to the LB Camden both in relation to the current LB Camden policies and the extant position.

Proposed Land Uses

- 8.12 The proposed development is a mixed-use development comprising a range of uses across three buildings including Hotel (Use Class C1), Residential (Use Class C3) and Town Centre (Use Class E, formally A1 and A3). Within this section each of the uses will be considered separately in relation to specific policies from the development plan. However, prior to addressing individual uses it is important to address the LB Camden policies on mixed-use developments.
- 8.13 The provision of a mixed-use development accords with the objectives of the NPPF, the London Plan and the Camden Local Plan. Within the NPPF (Paragraph 91) the development of mixed-use schemes are promoted as they encourage social interaction *"including opportunities for meetings between people who might not otherwise come into contact with each other."*
- 8.14 The provision of a mix of uses on the site is strongly supported by Policy H1 (Delivery and Location of Growth) of the Camden Local Plan where it is stated that the growth required within Camden will be delivered through expecting the provision of a mix of uses, in particular in the most accessible parts of the borough and containing self-contained housing where

² Class E as introduced in September 2020, formerly Class, A1, A2, A3 and A5.

8.0 Planning Assessment

possible. The site, by nature of its adjacency to Chalk Farm Station and key bus routes is considered to be one of the most accessible locations, and therefore a mixed-use scheme that is viable and makes the most efficient use of the land is wholly in accordance with policy.

8.15 The development comprises the following land uses (Table 4):

Use	Proposed Floorspace		Quantum
	GEA	GIA	
Retail (Use Class A1-A3/Class E)	720sqm	651sqm	3 Units
Hotel (Use Class C1)	4,555sqm	4,033sqm	118 Keys
Residential (Use Class C3)	4,127sqm	3,705sqm	35 Dwellings
Plant/Ancillary	447sqm	399sqm	-

Table 4: Land Uses

- 8.16 The site is not located within a Town Centre nor is it located within the Central London Area, however through pre-application discussions LB Camden Officers have consistently advised that they would seek to apply Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) of the Camden Local Plan given its fringe location on the edge of Camden Town and the scale of the non-residential use proposed. The requirement to apply the mixed-use policy was also confirmed within the LB Camden pre-application response in July 2020.
- 8.17 In order to help meet its housing targets, Policy H2 of the Camden Local Plan requires that where non-residential development is proposed, that self-contained homes form part of the mix of uses within applications. The requirement as set out in the policy is that for developments within Camden Town that involve additional floorspace of more than 200sqm (GIA), the LB Camden will require 50% of all additional floorspace to be self-contained housing, subject to a range of considerations.
- 8.18 The scheme as currently proposed results in an overall uplift of 1,515sqm (GIA). Therefore, in line with Policy H2, 50% of this is required to be self-contained housing. If, the additionality if over 1,000sqm the LB Camden expects the housing to be delivered on-site.
- 8.19 The applicant considered the specific requirements set out within Policy H2 and considered that it would be appropriate to deliver on-site self-contained housing as part of a comprehensive redevelopment as the surrounding character of the site and area is inclusive of residential, and the site form lends itself to the ability to deliver a mix of land uses. It is also considered that the co-location of a hotel and residential would be complimentary from an operational perspective.
- 8.20 When considering the requirement under Policy H2 in the context of the proposals the following is required:

8.0 Planning Assessment

	Requirements under Policy H2	Proposed	Difference
Proposed Floorspace	8,788sqm		
Existing Floorspace	7,273sqm		
Additional Floorspace	1,515sqm		
Quantum (GIA) of Self-Contained residential housing	757.5sqm	3,705sqm	+2,947.5sqm
Quantum (GIA) of Affordable Housing Required by Policy H2	378.75sqm	2,002sqm	+1,623.25qm

Table 5: Requirements under Policy H2

- 8.21 The proposed development, as can be seen from Table 5 above, is wholly in accordance with and is significantly exceeding the requirements of Policy H2 both in relation to the required self-contained residential accommodation and on affordable housing. It is considered that the provision alongside the hotel is therefore wholly appropriate.

A discussion on the individual land uses proposed and their compliance with the planning framework is set out below.

Hotel

- 8.22 The scheme will deliver a modestly sized hotel providing 118 bedrooms across 4,033sqm (GIA) of floorspace. The proposed hotel would be of high quality and will bring a standard of visitor accommodation that is not currently found within Chalk Farm or Camden Town.
- 8.23 The applicant, as previously referenced, is a Spanish hotelier and its intention is to model their first UK hotel on their Barcelona hotel. This provides accommodation for business and tourist visitors and is operated in a high service manner but at a modest price point. Its ground floors are deliberately designed to be welcoming to the passing public and its café spaces are well used by its surrounding community.
- 8.24 The application proposals will add to the character and amenity of Chalk Farm, Camden Town and London in a way that benefits the local economy and brings local employment.
- 8.25 At the local level, Camden Local Plan Policy E3 'Tourism' is clear that the Council will support tourism development and visitor accommodation.
- 8.26 The policy itself is separated into two distinct sections that reflect issues that the Council would like applicant's and developments to address where appropriate and practical (a-g), and separately identifies matters that must be complied with (f to i) with respect to tourism development and visitor accommodation .
- 8.27 The Council will:

8.0 Planning Assessment

- a. expect new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;
- b. allow smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage;
- c. consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough;
- d. encourage large-scale tourism development and visitor accommodation to provide training and employ Camden residents;
- e. protect existing visitor accommodation in appropriate locations.

8.28 It continues with a firmer requirement that,

"All tourism development and visitor accommodation must:"

- f. be easily reached by public transport;
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;
- h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
- i. not lead to the loss of permanent residential accommodation."

8.29 Consequently, it is clear that it is anticipated that there will be tourism development and visitor accommodation that may not meet all of the expectations of parts a-e but that parts f-i must be complied with. We have reviewed each section and provide commentary as to how the proposed development addresses the expectations or indeed where it cannot do, why it remains appropriate development.

a. expect new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;

8.30 It is illogical that a tourism development as opposed to a hotel development will have the same impact if they are of the same size. Tourism development, which is understood to relate to 'tourism attractions' such as museums, galleries and concert venues may lead to significant impacts depending on location, size, and the intensity and nature of use. It is the attractor from which visitor accommodation effectively feeds. It is therefore considered illogical to apply the same floorspace threshold when assessing the two types of development as their fundamental operations and purpose are distinctly different. The supporting text to policy E3 consequently makes an important distinction at para 5.58 (CBRE emphasis) and states.

"The Council will guide tourism development that is likely to attract large numbers of people to Camden's part of Central London, particularly the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road. The Council will generally consider large-scale developments to be those that provide additional floorspace of 1,000sqm or more. For tourism developments in Fitzrovia please refer to the Fitzrovia Area Action Plan. Tourist attractions may also be acceptable in other parts of the borough if they have a local focus and a limited number of expected visitors. Examples of this type of attraction are the Freud Museum, near Finchley Road, and Keats' House in Hampstead."

8.31 The Local Plan evidently defines large scale 'tourism development' (as distinct from visitor accommodation) as having a floorspace of at least 1000sqm. The definition of what is

8.0 Planning Assessment

considered to be large scale visitor accommodation is not indicated by the Local Plan due to the fact that it is common sense that in many instances this could be significantly beyond 1,000sqm and not raise any of the concerns or impacts that the Council has for ‘tourism development’ beyond this size.

- 8.32
- In addition to quanta, the policy and supporting text specifically and sensibly does not preclude visitor accommodation or tourism development as being inappropriate outside of the central area, rather as clearly stated this should be a guide with proposals assessed on a site by site basis.
- 8.33
- It is clear that this part of the policy is to be flexibly applied as is evidenced by other permissions granted outside of the central activity area ((2019/3138/P, 115-119 Camden High Street), which at 2,343sqm also exceeds the 1,00sqm threshold. At 118 bedrooms, the proposed hotel is modest in size but sufficiently large to be both viable in itself, meaningful in the support that it gives to local tourist attractions and able to deliver the significant public benefit of 18 social-affordable housing units.
- 8.34
- This is a location that requires hotel accommodation to support a number of major tourist attractions both of a London and local significance (see Table 6 below). The table shows the key attractions that are located within 1 mile of the site and are therefore easily accessible on sustainable modes of transport such as walking and/or cycling.

Tourist Attraction	Distance from Site	Walking Time
The Roundhouse	0.1mile	2 minutes
Zabludowicz Collection	0.2 miles	5 minutes
Camden Stables Market	0.3 miles	7 minutes
Primrose Hill	0.3 miles	7 minutes
Regents Canal	0.4 miles	9 minutes
Camden Lock Market	0.5miles	10 minutes
Regent’s Park	0.7 miles	14 minutes
London Zoo	0.7 miles	14 minutes
Hampstead Heath	0.9 miles	19 minutes

Table 6: Attractions within 1.0mile of Site

- 8.35
- At present those attractions are not supported to an adequate degree through convenient hotel accommodation of a high quality. In the immediate vicinity of the site is Camden Market and the Roundhouse as well as Primrose Hill or lesser known attractions such as the Zabludowicz Collection These attractions sit close to or within the diverse range of commercial, retail and leisure uses that form Camden High Street, an internationally known attraction in itself.
- 8.36
- A typical visitor to Camden Town Centre will arrive and depart within a matter of hours. Part of the reason for that is the entertainment focus for much of its trade but also the fact that there are curiously few suitable hotels in which tourists especially would choose to stay and in

8.0 Planning Assessment

doing so spend significantly longer in the town centre and venturing to more marginal tourist attractions. Creating this longer period allows visitors to contribute much greater amounts to local businesses and in doing so creating much greater local employment opportunities.

8.37 Having considered points a-i within policy E3, it is relevant to consider whether the application proposals represent 'large scale visitor accommodation'. It is obvious that there is a significant range in hotel sizes across Camden and London. The Draft London Plan evidence base identifies that the average size of a London hotel is 102 room (Projections of demand and supply for visitor accommodation in London to 2050 Adam van Lohuizen and Brian Smith April 2017). Based on the above, the proposed 118 rooms is not be considered to be of a larger scale.

8.38 Finally, regardless of the issues outlined above, the policy allows for the possibility that there will be circumstances where larger scale hotels will be appropriate outside of the central area. Given the extent and significance of the tourism attractions such as Camden Market and the Roundhouse, it would be entirely appropriate for a hotel of a larger size than that proposed to be permitted in order to meaningfully support these tourist attractions in a sustainable way provided that it responded appropriately to its context.

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

8.39 As noted above the classification of smaller scale visitor accommodation is not related to the 1000sqm definition of 'tourism development'. The proposed hotel is not a large-scale hotel with substantial rooms such as one might find in the central area of Camden (eg. The Rosewood – 308 rooms, NYX Hotel – 213 rooms, The Principal – 334 rooms, St Pancras Renaissance – 207 rooms).. It would be a hotel that is appropriate to its location's capacity in respect of the townscape, access and amenity impact.

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

8.40 The hotel does not lie within the Camden Town Centre but sits adjacent to it. The town centre boundary is located on the eastern side of Haverstock Hill, the below figure demonstrates the proximity of the site to the town centre boundary, the boundary is shown in royal blue.

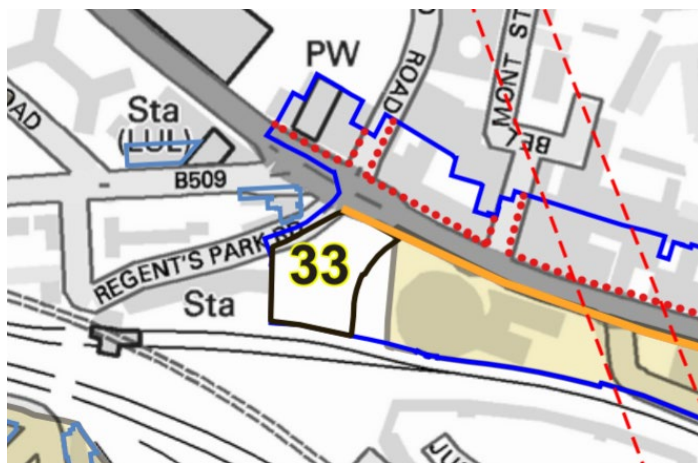


Figure 2: Extract from the Camden Policies Map (2017).

8.41 This part of the policy does not require hotels to be of a specific size. As above, the proposed hotel is appropriate to its particular context.

8.0 Planning Assessment

- 8.42 Within the supporting text of Policy E3 it notes that amongst other places, shopping destinations like Camden Town's markets, venues such as the Roundhouse and Koko, Regent's Canal and open spaces like Hampstead Heath and Primrose Hill all 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.
- d. encourage large-scale tourism development and visitor accommodation to provide training and employ Camden residents;*
- 8.43 The applicant is willing to agree to appropriate obligations to provide training and employ Camden residents.
- e. protect existing visitor accommodation in appropriate locations.*
- 8.44 This part of the policy is not relevant to this application.
- As outlined above, parts f-i of policy E3 require compliance as opposed to parts a-e that are led by the context and circumstances of a site. Again, we comment below how the proposed development responds to the requirement that "All tourism development and visitor accommodation must:"
- f. be easily reached by public transport;*
- 8.45 The site has a PTAL of 6a (excellent) and is highly sustainable due to the fact that it is situated next to Chalk Farm Underground station, adjacent to numerous bus routes and within 1km of a mainline train station.
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;*
- 8.46 Taxi trips associated with the proposed hotel use will be accommodated on the highway through the existing arrangement on street. The transport assessment has identified that there is sufficient capacity for this to occur with no interference to local traffic. No coach parking is needed to be provided on the site. The WSP Transport Assessment provides additional detail on this aspect, however it is considered that due to the highly accessible nature of the site the significant majority of trips will be made via public transport and other sustainable modes of transport.
- 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*
- 8.47 A hotel will add to the strongly mixed use and vibrant character of the surrounding area. To the east of the site is Camden Town Centre, with its offices, tourist and cultural attractions, restaurants, shops and bars. To the west of the site is Belsize Park and Primrose Hill, providing a residential context. The site being located at the intersection of these uses plays a key role in transitioning from the town centre to the residential neighbourhoods beyond.
- 8.48 The proposals would generate significant economic benefits for the London Borough of Camden including in relation to operational benefits, indirect and induced benefits. This would be inclusive of circa 92 FTE jobs created on-site and circa 45 jobs created off-site in the supply chain. The proposals would create an outlet for visitor and household spending totalling £7.3m per annum.
- 8.49 The proposals would not result in any harm to local services and indeed would rejuvenate a long term largely vacant site and bring much needed local employment opportunities. The ground floor uses of restaurant, café and shops would add more amenity for the local

8.0 Planning Assessment

community than the permitted development which included residential at the ground floor across most of the site.

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

- 8.50 Finally, with respect to land use considerations, it is important to note that the site does have an extant planning permission, and this would result in the delivery of 77 residential units, if it were to be delivered. As this consent has not been delivered, and indeed there are a number of challenges and issues associated with doing so, it is not considered that the proposal would result in the ‘loss of permanent’ residential accommodation.
- 8.51 The application proposes a straightforward proposition. It presents the opportunity, to deliver a significantly greater level of social-affordable rented housing that under the extant consent. This scheme would deliver 18 social-affordable rented units, which is ten units greater than permitted under the extant consent.
- 8.52 In this instance, the extant planning consent has numerous challenges around viable delivery that prevents it from coming forward in the near future. As such it is considered that there is no reasonable prospect that the residential permission will come forward in its current form.
- 8.53 At the London Level, the Intend to Publish London Plan (ItPLP) Policy E10 (Visitor Infrastructure) highlights the importance of visitor infrastructure across London stating that the visitor economy and associated employment should be strengthened through the enhancement and extension of attractions. This includes a requirement to ensure that there is a sufficient supply and range of serviced accommodation across the Capital. With serviced accommodation being promoted in town centres, they should be well connected by public transport.
- 8.54 It is important to note that the ItPLP further increases this target, identifying that London will require an additional 58,000 bedrooms by 2041 with a delivery rate of 2,230 bedrooms per annum. The supporting evidence for the ItPLP³ suggests that Camden will have a net room demand of 1,595 hotel bedrooms between 2015-2041 which is 2.7% of the total net demand for London.
- 8.55 Paragraph 6.10.3 of the ItPLP encourages Boroughs in inner London beyond the Central Activities Zone to plan proactively for new accommodation in town centre to help spread the benefits of tourism to the whole of the capital.
- 8.56 In summary, it is considered that the proposed hotel would deliver a significant economic and social benefit to this area of Camden, it would attract a range of visitors many of whom would likely visit for the local and specialist attractions that Camden has to offer. The hotel would provide amenities which would enliven this area of Camden and which would employ and train local Camden residents. Through a thorough assessment of Policy E3 it is considered that the proposed scheme is compliant with Policy E3.

Residential

- 8.57 The principle of utilising the site for residential has been established through the extant planning consent.
- 8.58 The redevelopment of the site will result in the delivery of 35 residential units (Use Class C3). The redevelopment will provide 17 market units and 18 social-affordable properties. This would result in the delivery of 54% affordable housing (based on a GEA floorspace basis)

³ Projections of demand and supply for visitor accommodation in London to 2050 (April 2017).

8.0 Planning Assessment

across a range of unit sizes which have been informed by the LB Camden's dwelling size priorities.

- 8.59 This application should be assessed on its own merits, however when considering the extant planning consent it is important to note that the extant scheme is neither currently viably deliverable in the current market nor would it, on completion, sufficiently deliver homes in the right tenure and size for the Camden market.. However, the permission exists and has some relevance as a planning consideration.
- 8.60 Policy H1 (Maximising Housing Supply) states that where there is an existing consent for residential the LB Camden will resist alternative development proposals unless it is shown that the site is no longer developable for housing. The previous consent on the site is currently not deliverable, and as such it would not contribute to meeting specific needs within the Borough. Therefore, whilst there is a perceived loss of 42 residential units on the site, these will not come forward. The proposed alternative scheme still with significant housing provision alongside an active and vibrant hotel use, is considered to be an appropriate mixed use of the site that facilitates a meaningful housing element.
- 8.61 The site is currently vacant, underutilised and is considered to be a significant detractor in the local townscape. The proposed development of the site would deliver the maximum reasonable provision of housing compatible with the proposed hotel use on the site and is therefore considered to be in accordance with Policy H1.
- 8.62 It is also important to reflect again on the proposals and their compliance with Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes). Whilst the site is not located within the Central London Area and is outside the Town Centre of Camden Town, the applicant has sought to meet and exceed the requirements of this policy, delivering on-site 3,705sqm of self-contained housing of which 2,002sqm is proposed to be affordable. This exceeds the requirement by 2,947sqm in relation to self-contained housing and a significant 1,623.25sqm greater provision of affordable than would be required by Policy H2. This is a significant contribution to the housing need and requirements within the Borough.

Housing Tenure and Mix

- 8.63 The proposed will deliver 35 residential units. 18 of the proposed units will be Social-Affordable with the remaining 17 units proposed as market. The units will be delivered tenure-blind on a highly accessible and sustainable location within the Borough.
- 8.64 The proposed development will deliver 51% affordable housing (on a unit basis) and 54% affordable housing (on a floorspace basis) with a focus on delivering family sized accommodation (2Bed and above) within the affordable tenure.
- 8.65 The table(s) below set out the proposed residential tenure and mix to be delivered on the site.

	Social-Affordable Rented		Market	
	No.	%	No.	%
1 Bed 2 Person	5	27.8%	7	41.2%
2 Bed 3 Person	5	27.8%	0	0%
2 Bed 4 Person	0	0%	7	41.2%

8.0 Planning Assessment

3 Bed 5 Person	8	44.4%	3	17.6%
Total	18	100%	17	100%

Table 7: Proposed Housing Tenure and Mix

- 8.66 The development is providing a mix of affordable and market units. The inclusion of two tenure types is in line with policies that seek to ensure that housing developments deliver a range of products suitable for the context, size, type and tenure of housing needed for the whole community (NPPF, Paragraph 61).
- 8.67 The inclusion of a mix of tenure types within the development also ensures that the redevelopment of the site provides a genuinely affordable, inclusive and mixed community (ItPLP, Policy GG4, Delivering the Homes Londoners Need).
- 8.68 At the local level, the LB Camden Policy H4 (Maximising the supply of affordable housing) identifies that there is a need for 5,300 affordable homes to be delivered in the Borough until 2031. The guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. The proposals do not include any intermediate housing, 100% of the proposed affordable will be social-affordable. This is considered to meet a specific need and demand in Camden.
- 8.69 As is set out in the Local Plan, the affordability of intermediate products in Camden is challenging given the higher land values in the Borough and it is confirmed that the guidelines on tenure mix will be applied flexible, and that the LB Camden may, in certain circumstances support proposal which only provide a single affordable tenure.
- 8.70 The most recent Annual Monitoring Report for Camden (published in March 2018) identifies that Camden have not met their target for affordable housing completions and therefore it is considered that this viable scheme, which will contribute 18 high quality social-affordable rented units is wholly appropriate.
- 8.71 Table 7 provides a breakdown of the proposed tenure and unit mix within the development. The proposed development provides a range of unit sizes, and in line with the ItPLP Policy H10 (Housing Size Mix) consideration has been given to the following key elements:
- Local evidence;
 - The need to deliver mixed and inclusive communities;
 - The need to deliver a range of options; and.
 - The location of the site.
- 8.72 In line with Policy H7 (Large and Small Homes) of the Local Plan, the scheme will deliver a range of homes of different sizes which contribute to meeting the priorities set out within the Local Plan for Dwelling Size Mix. Table 1 of the Camden Local Plan identifies high priority for 2 Bedroom and 3 Bedroom Social-Affordable rented properties, 13 out of the 18 properties within this tenure are proposed to be either two or three bedroom which meets the priorities of the LB Camden. This is significant improvement on the previous scheme where eight units were proposed to be studio accommodation with no private external space.
- 8.73 With regard to the market housing the priority is as per social-affordable, the scheme does deliver both two- and three-bedroom units but is also supplemented with a significant number of one-bedroom units. These are considered to be more appropriate given the location and the land values in this part of Camden.

8.0 Planning Assessment

Accessible Homes

- 8.74 The development includes 10% of dwellings meeting Building Regulation requirement M4(3) 'wheelchair user dwellings', the remaining 90% will be delivered in line with Building Regulation requirement M4(2) 'accessible and adaptable dwellings, this is in accordance with the ItPLP Policy D7 (Accessible Housing) and Camden Local Plan Policy H6 (Housing Choice and Mix).
- 8.75 The wheelchair user dwellings have been split across the proposed tenures, with one 3B5P market unit being provided and three 3B5P social-affordable units being provided as M4(3).

Residential Quality

- 8.76 All of the proposed residential has been designed to an equal standard and is tenure blind. All of the proposed units meet or exceed the minimum space standards as defined in the ItPLP Policy D6 (Housing Quality and Standards).
- 8.77 The design and layout of the scheme has been developed to ensure the optimisation of the units and to maximise the provision of dual aspect units. In total 19 of the proposed units will be single aspect, however none of these units are north facing single aspect. This includes nine social-affordable rented units, and 9 market units. Whilst single aspect units are provided through technical analysis it has been confirmed that they have adequate ventilation and privacy and will not suffer from overheating. Therefore, the units are considered to accord with ItPLP Policy D6(Housing Quality and Standards).
- 8.78 Each residential unit has private outside space in the form of a balcony, all residents also have access to the fifth-floor roof garden which provides an additional external amenity space for all residents as well as the ability to utilise the public courtyard at ground. This is considered to be a significant improvement on the previous permission as private amenity space was omitted from the eight studio units, these residents did not have access to any external amenity space as again the roof terraces were private for specific units and the provision of external space at ground only stretched to 70sqm.

Summary

- 8.79 Overall, it is considered that the provision of high quality, tenure-blind residential on this accessible, sustainable and brownfield site is wholly appropriate when considered alongside the proposed complimentary hotel use which secures its delivery. The development will deliver a high-quality residential development that meets and exceeds a range of regional and local priorities and policies.

Town Centre Uses

- 8.80 The scheme will deliver 651sqm of Class E (formerly A1, A3, A5) floorspace across three units. The largest unit, delivering 517sqm will be located at ground level within the hotel lobby and will provide a lettable space for a food and beverage occupier. On Adelaide Road there are two further units which will provide 134sqm of retail/café floorspace to activate the frontage and to provide further complimentary uses to the hotel and residential proposed.
- 8.81 The existing retail parade on Adelaide Road is a designated Neighbourhood Parade, under Policy TC2 (Camden's centres and other shopping areas) the Council will seek to retain shopping for resident's in these locations ensuring that development does not harm the function or character of the centre. The existing centre provides 406sqm on Adelaide Road, therefore these proposals do result in a reduction of 272sqm however the proposals retain the active frontage on Adelaide Road and will provide two units which will be delivered as fit

8.0 Planning Assessment

for purpose modern units as opposed to the current poor quality units that existing on the site. In addition, whilst not on the Adelaide Road frontage, the hotel lobby will be inclusive of an area of over 500sqm of further activated town centre space including a restaurant area and given the greater permeability at ground floor this is considered to be a supporting function which will significantly improve the vibrancy and vitality of the area.

- 8.82 Whilst there is a loss, it is considered that the re-provision in two high quality and appropriate units will continue to ensure the vibrancy of this area of Camden.

DESIGN

- 8.83 The Design and Access Statement (prepared by Sheppard Robson) sets out the key design principles that have informed the design development for this scheme. The proposed design responds to the character, context, opportunities and constraints of the Site and surroundings and is considered to deliver a complimentary addition to the local townscape and vernacular.
- 8.84 This is visually significant site within Camden. The plot is constrained, and the design has been developed to respond to these issues.
- 8.85 Importantly the massing of the proposed development is in accordance with the massing previously approved in 2018 with only minor derogations from the envelope. The extant consent provides a clear precedent for this scale of development on the site. The design quality has been similarly enhanced to ensure the highest standard of architecture and design.
- 8.86 The design team have responded positively to feedback from, and engagement with, stakeholders, LB Camden, and the Design Review Panel in order to maximise the positive design contribution of the scheme. We would encourage that this section is read in conjunction with the Design and Access Statement. The approach taken has been design-led and tenure blind and is consistent with planning policies at all levels.
- 8.87 The key principles and objectives of the proposals are as follows:
- To provide a high-quality, tenure blind design for the residential with well-integrated amenity spaces;
 - To deliver a high-quality modest hotel development which provides generous room sizes and meets the aspirations of the hotelier and the local market;
 - To produce a scheme of high-quality architecture which provides a complimentary and subtle backdrop to the adjacent Grade II Listed Station;
 - To design a building which positively responds to the context of the local area;
 - To deliver a build quality that delivers a positive contribution to this area of Camden.
 - To design a sustainable building that maximises utility, efficiency and minimise future maintenance.
- 8.88 The proposals have been designed to respond to the unique triangular shape of the site, with three distinct yet unified blocks being proposed. The two larger buildings provide an activated street frontage to both Adelaide Road and Haverstock Hill, whilst the third building provides an attractive link building which is subservient to the main buildings and the adjacent Chalk Farm Station. Another key driver of the design has been to ensure that the bulk and mass minimises any impacts on neighbouring residential properties, hence the reduced height of the linking block to the rear.

8.0 Planning Assessment

- 8.89 The Design Review Panel were particularly welcoming of the activation of the frontages, consideration that this would be very beneficial to the area and welcomed the relationship created between the ground floor spaces.
- 8.90 The layout of the development has been designed to complement the existing context with the proposed hotel being located on the more civic Haverstock Hill where there are existing education and commercial buildings and through the activation of the frontage will re-invigorate this location. The residential is delivered on the more 'residential' Adelaide Road.
- 8.91 All three buildings share an articulation of flush and angled piers with the flank buildings taller but clad in a lighter shade of salmon coloured brick which will compliment and set-off the darker station building to the front. The link building to the rear will be clad in a darker brick so as to define the two larger buildings as clear and distinct buildings but to also express clearly the gap between the buildings creating a positive backdrop to the Station.
- 8.92 The proposed materials will be sympathetic to the adjacent station proposing a mix of lighter salmon toned and darker red toned bricks. The brick will be accented through pre-cast concrete and glazed terracotta which is wholly in accordance with the local materials palette.
- 8.93 The design team have developed the proposals for 5-17 Haverstock Hill to be in accordance with Policy D1 (Design) of the Camden Local Plan in that the scheme will be wholly respectful of the local context and character and will enhance the historic environment by providing a sympathetic and complimentary back drop to the adjacent Grade II Listed station. As has been discussed with the LB Camden and the Design Review panel the scheme will integrate well with the surrounding streets and the fully permeable ground floor will provide a great opportunity for the hotel and residential development to seamlessly integrate into the local fabric. The development will be constructed sustainably and will incorporate the highest quality materials.

HERITAGE AND TOWNSCAPE

- 8.94 The site of 5-17 Haverstock Hill is not located within a Conservation Area nor is the Building listed. The adjacent property (Chalk Farm Station) is Grade II Listed, and therefore consideration has been given to this property throughout the design development. We would encourage the reader to review this section alongside the Townscape, Visual Impact and Heritage Assessment (prepared by Peter Stewart Consultancy).
- 8.95 The site is located within an area which is considered to be fragmented, with varying ages, styles and heights of development appearing side by side, leaving the area with an unbalanced architectural rhythm and lack of continuity throughout. The area is also currently going through a period of significant change with several large-scale planning permissions in place to redevelop existing heights. The pattern of development coming forward is higher than the existing context but remains considerate to the surrounding heritage assets and buildings.
- 8.96 It is considered that the proposed development will be of noticeably greater quality of design than the existing building on site.
- 8.97 The existing building does not make a positive contribution to the local townscape. The frontages provide no animation and it fails to contribute to the townscape and the public realm, as per the Peter Stewart assessment it is concluded that the existing building could in fact be detrimental to the local townscape. The redevelopment of the site provides an opportunity to redress this and the proposed development forms a fitting neighbour to the adjacent listed station, building on the wider positive change within the area.

8.0 Planning Assessment

- 8.98 The proposed strategy of focussing the massing on the two frontages appropriately reflects the status of the main roads and the clear sense of separation between the buildings creates a distinct relationship with the adjacent station. The proposed orthogonal forms of the proposed buildings are considered to provide a welcome contrast with the distinctive bullnose shape of the station building.
- 8.99 The development includes a restrained palette of high-quality materials that provide a cohesive appearance to the proposed development taking inspiration directly from the surrounding context. The proposed development has the potential to be a much-appreciated addition to the street and will enhance the townscape of the local area.
- 8.100 Chalk Farm Underground (Grade II) is immediately adjacent to the proposed development, the TVIHA (prepared by Peter Stewart) sets out that the proposed development would be a high-quality addition to the station's local setting. The proposal would be consistent with the varied character of the immediate and wider context and concludes that there would be no effect on any element of setting that contributes to the significance.
- 8.101 Likewise when considering the impact on the Grade II* Listed Roundhouse, the TVIHA concludes that the proposed development would appear in the background of some views of the building and the presence of the building would be consistent with the existing background, therefore not impacting upon any element of significance.
- 8.102 The development will have a very limited impact on the neighbouring Eton and Primrose Hill Conservation Areas, where the development is seen from within the Conservation Areas the view will be fleeting and it is considered that there will be no effect on any element of setting that contributes to the significance of these Conservation Areas. .
- 8.103 The proposed development has taken a positive approach to preserving and enhancing neighbouring heritage assets. The proposals have been design-led and have taken inspiration and guidance with regard to architectural expression, materiality and scale from the immediate context in order to deliver a comprehensively designed scheme that contributes positively to the townscape. The development proposals are in accordance with Local Plan Policy D2 (Heritage) in that it will preserve and likely enhance the diversity of the neighbouring heritage assets and their settings, this includes Conservation Areas and Listed Buildings.
- 8.104 The proposed development is not considered to cause harm to the neighbouring Conservation Areas or the adjacent Listed Buildings (Roundhouse and the Underground Station) as such Paras 195 and 196 of the NPPF are not considered to apply. However, when considering the proposals it is considered that there are significant public benefits associated with the scheme which would, in our view, outweigh any less than substantial harm caused to the assets.

TRANSPORT, SERVICING AND WASTE

Car Parking

- 8.105 The proposed development will be car free for both the residential and hotel elements of the scheme with no car parking proposed on-site. This approach is considered to be in line with Policy T1 (Strategic approach to transport) of the ItPLP and Local Plan Policy T1 (Prioritising walking, cycling and public transport). Through the lack of car parking provision, the scheme will actively encourage modal shift encouraging the use of the dedicated cycle storage on site and the use of the adjacent Chalk Farm Station and prioritising sustainable modes of travel.

8.0 Planning Assessment

- 8.106 The development is also located on a number of bus routes, and will soon be connected to an additional cycle route on Haverstock Hill. The site is highly accessible, having a PTAL of 6A and therefore in line with policies at the regional and local level the proposed car free nature of the scheme is wholly supported especially given the high level of connectivity (Policy T6, Car Parking, ItPLP and Policy T2, Parking and Car-Free Development, Camden Local Plan).
- 8.107 The applicant is comfortable with the necessary legal obligations being secured which would restrict the issuing of on-street parking permits to new residents to ensure that there are no adverse impacts on the local network as a result of the scheme (Camden Local Plan Policy T2, Parking and Car-Free Development).
- 8.108 With regard to wheelchair accessible parking, the scheme is not currently inclusive of a blue badge space. In line with the ItPLP the scheme is required to deliver one space (3%), and up to a maximum of four spaces (10%) if the demand arises. It is considered, due to the nature of the site that should a wheelchair accessible space be required that this could be accommodated on-street on Adelaide Road and would be subject to discussion with the Highways Authority.

Cycle Parking

- 8.109 Cycle parking within the development will be provided in line with the relevant standards as set out within Policy T5 (Cycling) of the ItPLP, this requires the following cycle parking to be provided on-site.

Land Use	Long-Stay Provision	Short-Stay Provision	Total
Class E (Formerly A1, Retail)	1	3	2
Class E (Formerly A2-A5 Use Class)	3	28	31
Hotel (C1)	6	3	9
Residential (C3)	64	1	65
Total	74	35	107

Table 8: Cycle Parking Provision

- 8.110 The proposed cycle parking has been designed to accord with the relevant London Cycle Design Standards and the LB Camden Planning Guidance on transport. It is proposed that the long-stay residential and commercial cycle parking is provided in separate secure and covered cycle stores which will have step-free access. Within the cycle stores, provision will be made for 5% of cycle stands to be for accessible bikes in line with the ItPLP requirements.
- 8.111 Within the hotel element of the scheme there will be provision made for lockers and showers for the staff.
- 8.112 In addition to the long-stay cycle parking, within the residential stores provision has also been made for visitor cycle parking and each resident will have control over access

8.0 Planning Assessment

provision for visitors. The commercial short stay cycle parking is proposed to be provided on the footway on Adelaide Road, this offers sufficient capacity.

- 8.113 The quantum of cycle parking spaces and their provision on site is in full accordance with the current cycle parking standards.

Coach Parking

- 8.114 There is no coach parking provided on the site for the hotel use. The WSP Transport Assessment provides additional detail on this element, however it is considered that due to the highly accessible nature of the site the majority of trips will be made via public transport and other sustainable modes of transport. This is in line with the overall aspiration of the Mayor and the LB Camden Policies on sustainable travel.

Deliveries and Servicing

- 8.115 The proposed development will be serviced on-site via a private access route situated at the rear of the site. The access route has been appropriately sized to accommodate a range of vehicles with the maximum vehicle size anticipated being the LB Camden refuse lorry. Once on the site deliveries will be unloaded directly in the service route and moved to the relevant location within the development.
- 8.116 The proposed internal servicing route is also proposed to be utilised by larger delivery vehicles for both the commercial land uses and the residential. It is considered smaller deliveries will be taken to the relevant building entrance for collection by residents. It is anticipated that there will be only a small number of trips per day for the residential and commercial uses (see WSP Delivery and Servicing Plan for full details).
- 8.117 The provision of the Delivery and Servicing Management Plan and the appropriate incorporation of on-site servicing is in accordance with Local Plan Policy T4 (Sustainable movement of goods and materials).

Waste

- 8.118 The waste strategy for the site has been developed in collaboration with the Principal Environmental Services Officer at the LB Camden, within the WSP Waste Management Strategy further information on engagement has been provided.
- 8.119 Each residential dwelling will have access to segregated waste disposal within their dwelling and will have access to a communal waste storage area provided at ground floor and appropriately sized for the development. It is intended that residential waste will be collected weekly and the LB Camden waste collection vehicle will utilise the on-site service road to the road to collect the residential waste.
- 8.120 Further to this, a bulky waste storage area has also been provided. Collection will be by arrangement only.
- 8.121 A further waste storage area is provided for the hotel and food and beverage facility on Haverstock Hill, this will be collected on a daily basis from the communal store. As with residential waste, the collection will be made from the internal service road.
- 8.122 The retail units will be managed separately, and tenants will be responsible for arranging their waste collection and frequency, it is anticipated that these units will also be serviced from the on-site service route.

8.0 Planning Assessment

- 8.123 The provision of waste storage facilities, access to segregated waste disposal and appropriate collection arrangements is in full accordance with Policy CC5 (Waste) of the local plan.

SUSTAINABILITY AND ENERGY

- 8.124 A substantive benefit of the scheme includes the opportunity to deliver a sustainable new development in line with requirements of the ItPLP and the Camden Local Plan. Quinn Ross have developed an Energy Strategy which has been submitted in support of this application along with a Sustainability Report which sets out the key measures to be incorporated into the development to achieve the required sustainability targets. The use of the Energy Hierarchy to develop a strategy is in accordance with Policy CC1 (Climate change mitigation) of the Camden Local Plan.
- 8.125 The proposed development will utilise a combination of Air Source Heat Pumps (ASHP) and Photovoltaics (PVs) to address the relevant targets. The assessment undertaken by Quinn Ross demonstrates that when utilising all elements of the Energy Hierarchy the building will achieve a 40% improvement over current Building Regulations in accordance with Policy CC2 (Climate change mitigation) of the Camden Local Plan. The 40% improvement is in excess of the requirement set out in the ItPLP (Policy SI 2, Minimising greenhouse gas emissions) which requires a minimum of 35% to be achieved on site.
- 8.126 In line with Policy CC1 (Climate change mitigation) the feasibility of connecting into a district heating network was explored. However, it was identified that there were no existing networks within 2km of the site and any networks beyond this would be unfeasible to connect into. Notwithstanding this, the basement plant room includes appropriate infrastructure to facilitate a future connection.
- 8.127 Quinn Ross have also undertaken a BREEAM Pre-Assessment relating to the non-residential elements within the scheme, this identifies that the building is on track to meet BREEAM 'Excellent'. The meeting of BREEAM 'Excellent' is in accordance with Policy CC2 (Climate change mitigation) of the Camden Local Plan.

FLOOD RISK AND DRAINAGE

- 8.128 The site is located in Flood Zone 1, and therefore has a low (less than 0.1%) annual probability of flooding. Paragraph 163 of the NPPF states that an appropriate Flood Risk Assessment is required for all development proposals of 1ha or greater, in Flood Zone 1. Whilst the development does not meet this criterion, a Flood Risk Assessment has been prepared by ARUP and is included in their Drainage Report which accompanies this application.
- 8.129 The site is considered to be at 'Very Low Risk' of flooding from surface water and is not located within an area considered to be vulnerable to groundwater flooding.
- 8.130 A surface water drainage strategy has been developed to accommodate the runoff during storm events up to 100 year plus 40% climate change allowance. It is proposed to discharge the surface water runoff at a controlled rate of 5l/s. Attenuation is provided in the form of blue/green roofs in combination with below ground attenuation. Provision has been made for grey water storage with internal reuse. The overall drainage strategy will result in a 90% reduction in surface water runoff.
- 8.131 The proposed drainage strategy for the development is in accordance with the relevant local plan policy, CC3 (Water and flooding).

8.0 Planning Assessment

AMENITY

Daylight and Sunlight

Impact on Neighbouring Properties

8.132 A Daylight and Sunlight Report has been carried out to assess the impacts of the proposed development on existing residential properties. This assessment provides a review of the proposed scheme against the current position and against the extant planning consent, given that this provides a precedent for impacts on the site. The high-level conclusions demonstrate the following:

- A total of six properties comprising 300 windows were assessed.
- When considered against the current position the proposal has very few noticeable impacts on surrounding properties. Out of the six properties assessed, only Eton Place (directly north) experiences reductions (both VSC and NSL) greater than the BRE guideline amount of 20%.
- In total, 34 windows within Eton Place experience derogation beyond 20%, 30 of these are reductions of between 20%-30% with the remaining windows being considered as moderate. Whilst there are moderate reductions to four windows, two of these are in small kitchens and bedrooms (which are considered of less importance) and two are in Living rooms.
- Compared to the permitted scheme, a proportion of windows experience increases in daylight levels, and where there are additional reductions, these represent a change of circa 1% or less which would be imperceptible.

8.133 The conclusions of the report set out that the daylight and sunlight levels remain adequate and where there are derogations these link to the urban and constrained nature of the sites and the 'Y' shaped configuration of the neighbouring buildings. In addition, the moderate reductions are experienced in bedrooms and kitchens not the main habitable areas.

8.134 As such it is considered that the development is wholly in accordance with Policy A1 (Managing the impact of development) of the Camden Local Plan.

Internal Daylight and Sunlight

8.135 An Internal Daylight and Sunlight Report has been carried out to assess the proposed residential development. The conclusions of this report demonstrate the following:

- The scheme demonstrates good compliance with the relevant guidelines on internal Daylight amenity.
- There are some derogations from the guidance but generally these are only minor.
- Derogations that do exist are a result of the presence of balconies which are required to provide adequate external amenity space for residents.

8.136 On balance, whilst there are some minor derogations these are generally as a result of a key design feature which provides external amenity space. As such it is considered that the development is wholly in accordance with Policy H6 (Housing Choice and Mix) of the Camden Local Plan.

Noise

8.0 Planning Assessment

- 8.137 Adnitt Acoustics have undertaken a Noise and Vibration impact assessment for the proposed hotel and residential development. The assessment has identified key areas where mitigation is required to be integrated in order to ensure that there are no adverse noise or vibration impacts. The assessment concludes that subject to the installation of the mitigation measures the development will be acceptable.
- 8.138 The development will incorporate vibration isolation within the base of the building, and this will be designed in the next stages to ensure that reradiated noise is not a concern within the development.
- 8.139 The assessment and report has been carried out with consideration to Camden Local Plan Policy A4 (Noise and vibration) and the proposed mitigation measures and strategy will ensure that noise and vibration is controlled and managed.

Air Quality

- 8.140 The Air Quality report prepared by Eight Associates assesses the impacts of the proposed development on air quality and the air quality constraints on the development proposals. The scheme has been assessed for both the impacts of transport and building operation against the relevant Air Quality Neutral guidance and it has been found to meet the requirements for Air Quality Neutral.
- 8.141 As such, the proposals are considered to be compliant with the relevant planning policy requirements (Policy CC4 Air Quality).

LANDSCAPING, PUBLIC REALM AND OPEN SPACE

- 8.142 The proposals include a carefully curated open space and public realm design, developed by RBMP. The predominant open space is provided at fifth floor roof level and will deliver a successful amenity space for residents and will deliver high quality natural play provision. This is supplemented by a ground floor courtyard which is fully accessible to the wider public and is proposed to be an extension of the hotel provision. The proposed landscaping strategy consists of the following key elements:
- 340sqm of open space at fifth floor roof level, including play space and external open space for adults and older people living within the development;
 - The roof garden provides low maintenance landscaping that will provide year-round interest;
 - An accessible courtyard space at ground floor level with seating and planting encouraging interaction;
 - Architectural planting is proposed within the Courtyard space, which will provide visual interest and opportunity for climbers and greening vertically.
- 8.143 The proposed development will provide 340sqm of open space at fifth floor roof level. This space is inclusive of an area of specific natural play provision and will also include more private secluded seating area for adults. The roof garden will provide unsegregated play space for the residential element of the scheme.
- 8.144 Within LB Camden Policy A2 (Open Space) a standard of 9sqm open space per occupant for residential schemes is required, based on the current residential mix this would equate to the delivery of 1,098sqm of open space. Given the constrained nature of the site the applicant has sought to maximise the opportunity for providing open space by delivering an accessible roof terrace which provides a total of 340sqm of open space including 100sqm

8.0 Planning Assessment

of natural play space. In addition, each residential unit has access to private amenity space in accordance with the relevant standards.

- 8.145 The LB Camden SPG on Public Open Space identifies that the GLA has a higher standard of 10sqm per child for the delivery of play space, it is recognised that this is challenging to achieve and will only be requested on large scale developments, of over 100 dwellings. Notwithstanding that, based on the child yield calculator and the current proposals the development would need to deliver 260.8sqm of playspace (to meet GLA standards) to meet LB Camden requirements this would need to be 169.65sqm (based on 6.5sqm per child).
- 8.146 The proposed development is located on a tight urban site and therefore the delivery of the full quantum of both play and open space is challenging. However, the space available has been optimised to deliver a high-quality space which contributes to the requirements whilst not fully meeting the policy levels. The applicant has included a ground floor courtyard space which contributes to the availability of open space, providing 309sqm of open space. However given the shared nature this has not been included in calculations. The application is welcoming of further discussions with the LB Camden on off-site contributions in relation to these matters.

Biodiversity and Ecology

- 8.147 A Preliminary Ecological Appraisal (PEA) has been carried out by DF Clark along with a Bat Emergence Survey.
- 8.148 The results of the PEA identify that there are no habitats of principal importance on the site and that no further surveys were required for a range of species. The main building on the site was considered to have low bat roosting potential and as such a bat emergence survey was conducted in September.
- 8.149 The emergence survey did not find any bats emerging from the building and as such the building is assessed to be likely absent of a bat roost and therefore no further surveys are required. It has been suggested that bat tubes and boxes are installed on the building.
- 8.150 The recommendations within the reports will be taken forward into the next stage of works including into the construction phase. The proposed development is not considered to directly or indirectly affect any designated sites or adversely impact upon biodiversity. In addition, the provision of biodiverse roofs and an area of open space at roof level does provide opportunity for biodiversity improvements. This is considered to be in line with Policy A3 (Biodiversity).

Trees

- 8.151 An Arboricultural Impact Assessment has been undertaken and a report submitted in support of this application. The survey undertaken identifies 15 trees which are a mix of category B and C.
- 8.152 Whilst there may need to be some facilitation pruning of some trees, no trees are proposed to be removed as a result of the development proposals.
- 8.153 The retention of all trees is in accordance with Policy A3 (Biodiversity) of the Camden Local Plan. In addition, further planting will be included within the roof garden and the courtyard to provide additional landscaping and vegetation.

9.0 Planning Obligations and CIL

SECTION 106 PLANNING OBLIGATIONS

- 9.1 Section 106 of the Town and Country Planning Act 1990 allows the entering into of an obligation, by agreement or otherwise, between the local planning authority and any person interested in the land for the purposes of:
- Restricting the development or use of the land in any specified way;
 - Requiring specified operations or activities to be carried out in, on, under or over land;
 - Requiring the land to be used in any specified way; or,
 - Requiring a sum or sums to be paid to the local planning authority (or, in a case where section 2E of the 1990 Act applies, to the greater London Authority) on a specified date or dates periodically.
- 9.2 Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 9.3 Paragraph 54 of the NPPF states that 'Local planning authorities should consider whether otherwise acceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 reinforces the requirement that planning obligations meet the tests set out in regulation 122 of the CIL Regulations.
- 9.4 Discussions are ongoing with the LB Camden regarding the proposed s106 obligations associated with the development. At the time of writing this planning statement the Heads of Terms are still being discussed and the below is not an exhaustive or final agreed upon list of contributions associated with the scheme. All of the below are subject to final discussion and agreement with the LB Camden.
- Car Free;
 - Sustainability and Energy Plans;
 - Construction Management Plan, Monitoring Fee and Bond;
 - Highways Contribution (Subject to discussion with LBH Highways);
 - Pedestrian, Cycling and Environmental Contribution;
 - Public Open Space;
 - Affordable Housing
 - Employment and Training;
 - Agent of Change.

COMMUNITY INFRASTRUCTURE LEVY

- 9.5 Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Regulations 2010 (as amended), the Mayor of London's Community Infrastructure Levy (MCIL2) and Camden Community Infrastructure Levy (CCIL) will be chargeable on this

9.0 Planning Obligations and CIL

application commencement. This will be calculated in accordance with the Mayor's and Camden's adopted Community Infrastructure Levy Charging Schedules at the point of determination of that application.

London Borough of Camden CIL

- 9.6 The LBC CIL Charging Schedule adopted a new CIL Schedule on 30th October, any permission granted following this date will be subject to the new rates within the schedule and not those within the 2015 schedule.
- 9.7 The site is located within Zone C, and as such the proposed CIL rates are as follows:
- Residential (of 10 or more dwellings) - £644per sqm
 - Retail - £32per sqm
 - Hotel - £38per sqm

Mayoral CIL

- 9.8 The Mayoral CIL2 Charging Schedule was adopted in January 2019, coming into effect on 01 April 2019. The proposed development is liable for MCIL2 at the rate of £80 per sqm of GIA.
- 9.9 The required CIL Form (Additional Information Requirement Form) has been submitted with this application.

10.0 Summary and Conclusion

- 10.1 This Planning Statement sets out the case for the redevelopment proposals at 5-17 Haverstock Hill, Chalk Farm. It has assessed the proposals against the relevant planning framework, and it is considered to accord with the aspirations of the development plan and will deliver a high-quality scheme which will provide a significant contribution to the local area.
- 10.2 The team have engaged with the LB Camden throughout the development of the proposals, and have, where appropriate to do so taken on board comments and amendments in order to deliver the high-quality scheme that has been submitted for planning.
- 10.3 The applicant and their design team have developed a high quality scheme, that respects and responds to the surrounding local context, in particular the Grade II listed Chalk Farm station, and delivers a high quality 118 bedroom hotel and 35 high quality residential units including 18 social-affordable units and 17 market units. All residential units are meeting the relevant size standard and provide a private amenity space in the form of a balcony.
- 10.4 This Statement and accompanying planning application documents clearly demonstrate that the proposals accord with relevant policies and will, in particular bring the following benefits:
 - The redevelopment of a vacant, underused brownfield site within Central London. The redevelopment will reactivate both the Adelaide Road and Haverstock Hill frontages and will create a vibrant hub.
 - The development proposals present an optimisation of the site, delivering a high-quality mixed-use scheme with a range of complimentary uses.
 - The delivery of 35 residential units all of which have been designed to be tenure-blind, high quality units with access to both private and communal external space.
 - Delivery of 18 social-affordable units with a focus on delivering family sized accommodation which will meet a specific need within the Borough.
 - The proposed will provide a sympathetic backdrop to the Grade II Listed station which will preserve and enhance the prominence of this key heritage asset.
 - Creation of an accessible courtyard space to be used by the local community to invigorate and provide a breathing space.
 - Delivery of a 118-bedroom hotel which will deliver an economic benefit to Chalk Farm and Camden, providing local job opportunities throughout construction and operation.
 - Provision of a hotel which will support the key Camden tourist attractions providing a base for tourists visiting the Roundhouse and Camden Markets.
 - Incorporate principles of sustainable design and construction, energy, water and waste reduction measures.
- 10.5 In conclusion, the proposed development accords with the aims and objectives of the relevant development plan and is considered to be of the highest quality creating a positive contribution to the local townscape and economy.

APPENDICES

Appendix A - Relevant Planning Policies

The below provides a summary of the key relevant planning policies:

PRINCIPLE OF DEVELOPMENT

- Local Plan Policy G1 (Delivery and Location of Growth) - The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by: a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site; b. resisting development that makes inefficient use of Camden's limited land; c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Residential

- Local Plan Policy H1 (Maximising Housing Supply) - The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. Housing is considered to be the priority land use within the Borough.
- Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) – To support the delivery of housing within the Borough the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing.
- Policy H4 (Maximising the supply of affordable housing) - The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. The Council will 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. The guideline mix for affordable housing types is 60% social-affordable and 40% intermediate.
- Policy H6 (Housing Choice and Mix) - The Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs. This policy includes a requirement to deliver 10% of all new build homes as M4(3).

- Policy H7 (Large and Small Homes) - 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.

Hotel

- Local Plan Policy E3 Tourism - The Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. They will:
 - a. expect new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;
 - b. allow smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage;
 - c. consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough;
 - d. encourage large-scale tourism development and visitor accommodation to provide training and employ Camden residents;
 - e. protect existing visitor accommodation in appropriate locations.

All tourism development and visitor accommodation must:

- f. be easily reached by public transport;
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;
- h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
- i. not lead to the loss of permanent residential accommodation.

Loss of Car Parking

- Local Plan Policy T2 (Parking and Car-Free Development) – The Council will limit the availability of parking and require all new developments in the borough to be car-free. The LB Camden will: (a) not issue on-street on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits; (b) limit on-site parking to: i. spaces designated for disabled people where necessary, and/or ii. essential operational or servicing needs; **(c) support the redevelopment of existing car parks for alternative uses; and (d) resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.**

Retail

- Local Plan Policy TC2 (Camden's Centres and Other Shopping Areas) (community facilities) states that the LBC will promote successful and vibrant centres throughout the

borough to serve the needs of residents, workers and visitors. They will: a. seek to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located; b. provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice; c. make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres; d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops; and e. pursue the individual planning objectives for each centre, as set out in supplementary planning document Camden Planning Guidance on town centres and retail, and through the delivery of environmental, design, transport and public safety measures. The Council has designated primary and secondary frontages in its centres, which are shown on the Local Plan Policies Map. They will: f. protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre; and g. protect the secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.

- Local Plan Policy TC2 (Camden's Centres and Other Shopping Areas) (community facilities) Neighbourhood Centres The Council will seek to retain convenience shopping for local residents in Camden's Neighbourhood Centres and will ensure that development in them does not harm the function, character or success of that centre.

AMENITY

- Local Plan Policy A1 (Managing the Impact of Development) - The Council will seek to protect the quality of life of occupiers and neighbours. They will grant permission for development unless this causes unacceptable harm to amenity. They will:
 - a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
 - b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
 - c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
 - d. require mitigation measures where necessary.

The factors we will consider include:

- e. visual privacy, outlook;
- f. sunlight, daylight and overshadowing;
- g. artificial lighting levels;
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;

- i. impacts of the construction phase, including the use of Construction Management Plans;
 - j. noise and vibration levels;
 - k. odour, fumes and dust;
 - l. microclimate; m. contaminated land; and
 - n. impact upon water and wastewater infrastructure.
- Local Plan Policy A4 (Noise and Vibration) - The Council will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. They will not grant planning permission for:
 - a. development likely to generate unacceptable noise and vibration impacts; or
 - b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

They will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

BASEMENT

- Local Plan Policy A5 (Basements)- The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
 - a. neighbouring properties;
 - b. the structural, ground, or water conditions of the area;
 - c. the character and amenity of the area;
 - d. the architectural character of the building; and
 - e. the significance of heritage assets.

In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

DESIGN

- Policy D1 (design) of the local plan states that the LBC will seek to secure high quality design in development. Specifically, the Council will require that development:
 - a. Respect local context and character;
 - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
 - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

- d. is of sustainable and durable construction and adaptable to different activities and land uses;
 - e. comprises details and materials that are of high quality and complement the local character;
 - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
 - g. is inclusive and accessible for all;
 - h. promotes health;
 - i. is secure and designed to minimise crime and antisocial behaviour;
 - j. responds to natural features and preserves gardens and other open space;
 - k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
 - l. incorporates outdoor amenity space;
 - m. preserves strategic and local views;
 - n. for housing, provides a high standard of accommodation; and
 - o. carefully integrates building services equipment.
- Camden Local Plan Policy D2 (Heritage) - The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
 - These provisions are echoed in the Draft London Plan (Policy D1 B), which sets out a design-led approach that:
 - a. enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;
 - b. encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area;
 - c. be street-based with clearly defined public and private environment;
 - d. facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users;
 - e. achieve safe, secure and inclusive environments;
 - f. provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest;

- g. deliver appropriate outlook, privacy and amenity;
- h. provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity;
- i. help prevent or mitigate the impacts of noise and poor air quality 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use Quality and character;
- j. respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character;
- k. be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well;
- l. aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy;
- m. provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

SUSTAINABILITY AND ENERGY

Climate Change Mitigation

- Policy CC1 (climate change mitigation) of LBC's Local Plan states that the council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Specifically, they will:
 - a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
 - b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
 - c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
 - d. support and encourage sensitive energy efficiency improvements to existing buildings;
 - e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
 - f. expect all developments to optimise resource efficiency. For decentralised energy networks, we will promote decentralised energy by:
 - g. working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;

h. protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and

i. requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment. Development is also required to be resilient to climate change, using Sustainable Urban Drainage Systems, integrating bio-diversity through green and blue roofs and green walls where possible, and reducing the impact of urban and dwelling overheating.

- The Draft London Plan echoes these sentiments and seeks for London to become a zero-carbon city by 2050, through initiatives such as a low carbon circular economy, smart and adaptive design to mitigate against climate change as well as the use of green infrastructure and open space.
- NPPF Paragraph 50 requires that new development be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Air Quality

- Policy CC4 (air quality) LBC's Local Plan states that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. They will take into account the impact of air quality when assess development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Air Quality Assessments (AQA) are required where development is likely to expose residents to high levels of air pollution. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan
- Draft London Plan Policy SI1 (Improving Air Quality) sets out that development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. It states that development proposals should not;
 - Lead to the further deterioration of existing poor air quality
 - Create any new areas that exceed air quality limits
 - Create unacceptable risk of high levels of exposure to poor air quality

In order to meet these requirements, as a minimum:

- Be air quality neutral
 - Use solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems
 - Major development proposals must be submitted with an AQA
 - Development proposals that are likely to be used by large numbers of people vulnerable to poor air quality (children or older people) which do not demonstrate that design measure have been used to minimise exposure should be refused.
- The NPPF sets out in paragraph 181 that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.
 - NPPF paragraph 103 requires that development should be focused in sustainable locations, limiting the need to travel. Opportunities to improve air quality or mitigate impacts should be identified. The proposed development will be car free and the site has a PTAL rating of 6A (where the most accessible level is 6B) which is considered to be highly accessible. The site is therefore considered to be a sustainable location in line with the NPPF.
 - GLA Sustainable Design and Construction SPG (Mayor of London, 2014) requires that an air quality neutral assessment be undertaken using the latest information about the proposed development.

Waste

- Policy CC5 (Waste) of LBC's Local Plan is seeking to make Camden a low waste borough. To achieve this, they will make sure that developments include facilities for the storage and collection of waste and recycling.
- The Draft London Plan states referable applications should promote circular economy outcomes and aim to be net zero waste. A Circular Economy Statement should be submitted to demonstrate:
 - How all materials arising from demolition and remediation works will be re-used and/or recycled;
 - How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life;
 - Opportunities for managing as much waste as possible on site;
 - Adequate and easily accessible storage space and collection systems to support recycling and re-use;
 - How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy; and
 - How performance will be monitored and reported.

Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported in the Draft London Plan.

Water Infrastructure

- Policy CC3 (water and flooding) of LBC's Local Plan states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. They will require development to:
 - a. incorporate water efficiency measures;
 - b. avoid harm to the water environment and improve water quality;
 - c. consider the impact of development in areas at risk of flooding (including drainage);
 - d. incorporate flood resilient measures in areas prone to flooding;
 - e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
 - f. not locate vulnerable development in flood-prone areas.

Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

- Policy SI5 (water infrastructure) of the Draft London Plan states that Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account. Development proposals should:
 - through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
 - achieve at least the BREEAM excellent standard for the 'Wat 01' water category^{124A} or equivalent (commercial development)
 - incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

In terms of water quality, Development Plans should:

- promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
- support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

Development proposals should:

- seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- take action to minimise the potential for misconnections between foul and surface water networks.

EA Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

Net Zero Carbon

- Policy SI12 (minimising greenhouse gas emissions) of the Draft London Plan states that developments should be net zero-carbon. A Major development should be net zero-carbon^{116C}. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- be lean: use less energy and manage demand during operation.
- be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- be seen: monitor, verify and report on energy performance.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy

A minimum on-site reduction of at least 35 per cent beyond Building Regulations¹¹⁷ is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site provided that an alternative proposal is identified, and delivery is certain.

Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.

Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

TRANSPORT AND ACCESS

Car Parking

- Policy T2 (parking and car-free development) of the Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. However, Blue Badge holders may need access to a disabled parking space. The council will consider parking provision for disabled people and essential uses where necessary.
- Policy T6 (car parking) of the Draft London Plan reiterates that car parking should be restricted in line with levels of existing and future accessibility and connectivity. A car-free development should be the starting point for all development proposals in place that are (or are planned to be) well-connected by public transport, such as this site. The development should still provide disabled persons parking for Blue Badge Holders in line with Part D of the policy. T6.5 (non-residential disabled persons parking) provides further clarity stating that it is necessary to provide the following for medical and health facilities:
 - Designated bays account for 6% of total parking provision;
 - Enlarged bays account for 4% of total parking provision;
 - Emergency services parking must also be facilitated.

Cycle Parking

- Part H of Policy T1 (prioritising walking, cycling and public transport) seeks to promote cycling in the borough by ensuring that developments provide accessible, secure cycle parking facilities which exceed the minimum standards outlined within the London Plan and design requirements outlined within the LBC Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development.
- The Draft London Plan provides the following requirement for the provision of cycle parking:

Use Class	Long stay (for employees)	Short stay (for visitors/customers)
A1 (Retail)	1 space per 175sqm	1 space per 150sqm
A2-A5	1 space per 175sqm	1 space per 20sqm
C1	1 space per 20 bedrooms	1 space per 50 bedrooms
C3	1 space per 1-person dwelling 1.2 spaces per 3-person dwelling 2 spaces for all others	5 to 40 dwellings – 2 spaces

- In addition, the Camden Planning Guidance: Transport (March 2019) and the London Cycling Design Standards (LCDS) provide detailed guidance on the design of cycle parking.

Access and Security

- Policy C5 Safety and Security of the Local Plan states the Council will aim to make Camden a safer place, through requiring developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury.

- LBC Policy C6 Access for all

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities and will:

- a. expects all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- b. expects facilities to be located in the most accessible parts of the borough;
- c. expects spaces, routes and facilities between buildings to be designed to be fully accessible;
- d. encourages accessible public transport; and
- e. secure car parking for disabled people.

The Council will seek to ensure that development meets the principles of lifetime neighbourhood.

- Part F of Policy D1 (design) of LBC's Local Plan states that developments should integrate well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes. It also requires that developments are inclusive and accessible for all to meet the needs of the community.
- Part A of Policy C1 (health and wellbeing) of LBC's Local Plan requires that developments contribute positively to creating high quality, active, safe and accessible places.
- Part C of Policy C2 (community facilities) of LBC's Local Plan states that the Council will ensure that facilities provide access to a service on foot and by sustainable modes of travel. Part D of this policy states that they will facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community, except for facilities occupied by the emergency services due to their distinct operating needs. Part F seeks the inclusion of measures which address the needs of community groups and foster community integration;
- Policy D3 (inclusive design) of the Draft London Plan states that development proposals should achieve the highest standards of accessible and inclusive design, taking into account London's diverse population with high quality people focused spaces that are designed to facilitate social interaction and inclusion. In addition, development proposals should be convenient and welcoming with no disabling barriers. Developments should be able to be entered, use and exited safely in everyday circumstances and during emergency evacuation with ease and dignity for all. In all developments where lifts are

installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. A Design and Access Statement should be submitted to detail this.

LANDSCAPING AND PUBLIC REALM

Open Space

- Policy A2 (open space) of the Local Plan states that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. In order to protect their open spaces, the Council will:
 - a. protect all designated public and private open spaces as shown on the Policies Map and in the accompanying schedule unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area;
 - b. safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals, we will take the following into account: i. the effect of the proposed scheme on the size, siting and form of existing open space and the functions it performs; ii. whether the open space is replaced by equivalent or better provision in terms of quantity and quality; and iii. whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the open space.
 - c. resist development which would be detrimental to the setting of designated open spaces;
 - d. exceptionally, and where it meets a demonstrable need, support small-scale development which is associated with the use of the land as open space and contributes to its use and enjoyment by the public;
 - e. protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;
 - f. conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets;
 - g. give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
 - h. promote and encourage greater community participation in the management of open space and support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;
 - i. consider development for alternative sports and recreation provision, where the needs outweigh the loss and where this is supported by an up-to-date need's assessment;
 - j. preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath; and

- k. work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath.

In order to secure new and enhanced open space, they Council will:

- l. seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy (CIL). The Council will secure planning obligations to address the additional impact of proposed schemes on public open space taking into account the scale of the proposal, the number of future occupants and the land uses involved;
 - m. apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial and higher education developments while taking into account any funding for open spaces through the Community Infrastructure Levy;
 - n. give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision;
 - o. ensure developments seek opportunities for providing private amenity space;
 - p. give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space;
 - q. seek opportunities to enhance links between open spaces recognising the multiple benefits this may bring;
 - r. tackle deficiencies to open space through enhancement measures; and
 - s. seek temporary provision of open space where opportunities arise.
- Policy G4 (open space) of the Draft London Plan reiterates the position of LBC, stating that development proposals should not result in the loss of protected open space and where possible create areas of publicly accessible open space, with an emphasis on provision in areas of deficiency.

Trees

- Policy A3 (biodiversity) of the Local Plan seeks to protect and enhance sites of nature conservation and biodiversity. The Council will:
 - a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;
 - b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;
 - c. seek the protection of other features with nature conservation value, including gardens, wherever possible;
 - d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;

- e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
 - f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;
 - g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;
 - h. secure management plans, where appropriate, to ensure that nature conservation objectives are met; and
 - i. work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.
- LBC will protect and seek to secure additional trees and vegetation. They will:
- j. resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;
 - k. require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;
 - l. expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;
 - m. expect developments to incorporate additional trees and vegetation wherever possible.
- The Draft London Plan supports LBC's position and states in Policy G1 (green infrastructure) that London's network of green and open spaces, and green features should be protected and enhanced. This is supported by the Mayor's manifesto commitment to make more than half of London green by 2050. Policy G7 (trees and woodlands) states that if planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, this may be determined by i-tree or CAVAT. In addition, planting of additional trees should generally be included in new developments. In particular, large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Appendix B – Affordable Housing Statement

AFFORDABLE HOUSING STATEMENT

5-17 Haverstock Hill

November 2020

AFFORDABLE HOUSING STATEMENT

- 1.1 This statement has been prepared by CBRE on behalf of the applicant, OD Camden Hotel Ltd, in support of an application for a mixed-use development incorporating a hotel (use class C1), residential (use class C3) and active ground floor uses (use class E, formerly A1, A3, A5).
- 1.2 This statement has been prepared in accordance with the requirements set out in the London Borough of Camden Local Area Requirements. This statement comprises provides the information relating to the proposed residential element of the scheme, with a specific focus on the social-affordable provision.
- 1.3 The scheme overall will deliver **35 residential units** of the 35, **18 are proposed as social-affordable rent**, with the remaining **17 being market**. On a unit basis this represents delivery of 51.4% affordable housing on site. The layout of the development has been carefully considered to optimise the affordable housing on site creating high quality tenure blind accommodation.
- 1.4 The details of the proposed affordable housing set out within this report should be read in conjunction with the following documents:
- Design and Access Statement (Sheppard Robson);
 - Residential Layout Plans (Sheppard Robson):
 - 6432-SRA-XX-XX-DR-A-02-400 P01 – Social Rent Flat Types
 - 6432-SRA-XX-XX-DR-A-02-401 P01 – Social Rent Flat Types
 - 6432-SRA-XX-XX-DR-A-02-402 P01 – Social Rent Flat Types
 - 6432-SRA-XX-XX-DR-A-02-403 P01 – Social Rent Flat Types
 - 6432-SRA-XX-XX-DR-A-02-410 P01 – Private Flat Types
 - 6432-SRA-XX-XX-DR-A-02-411 P01 – Private Flat Types
- 1.5 Overall, the development proposals comprise the following:

Use	Existing Floorspace	Proposed Floorspace	Difference (GIA)
	GIA	GIA	
Sui Generis	7,259.6sqm	0	-7,259.6sqm
Retail (Use Class A1-A3/Class E)*	406sqm	651sqm	+245sqm
Hotel (Use Class C1)	0sqm 0sqm	4,033sqm	+4,033sqm
Residential (Use Class C3)	0sqm	3,705sqm	+3,705sqm
Plant/Ancillary		399sqm	+399sqm

Table 1: Floorspace Breakdown

**Please note that this figure is inclusive of the units on Adelaide Road along with the Food and Beverage and lobby space within the hotel building.*

Proposed Housing

- 1.6 The following table provides a breakdown of the proposed residential offer on the site split by unit size:

	Social-Affordable Rented		Market	
	No.	%	No.	%
1 Bed 2 Person	5	27.8%	7	41.2%
2 Bed 3 Person	5	27.8%	0	0%
2 Bed 4 Person	0	0%	7	41.2%
3 Bed 5 Person	8	44.4%	3	17.6%
Total	18	100%	17	100%

Table 2: Residential Offer by Tenure and Size

- 1.7 The following two tables provide a breakdown of the residential offer in relation to the unit numbers provided floorspace and habitable rooms (both in GIA and GEA).
- 1.8 The quantum of affordable floorspace provided has been broadly guided by Policy H2 of the Camden Local Plan, however the floorspace provision is far in excess of requirements.

Gross Internal Area								
	Social-Affordable Rent (Sqm)	Units	Habitable Rooms	Private (Sqm)	Units	Habitable Rooms	Total (sqm)	Units
Seventh Floor	0	0		0	0		0	0
Sixth Floor	0	0		0	0		0	0
Fifth Floor	41	0		367	4		409	4
Fourth Floor	297	3		350	4		647	7
Third Floor	389	4		257	3		646	7
Second Floor	389	4		257	3		646	7
First Floor	389	4		238	3		627	7
Mezzanine	381	3		103*	0		484	3
Ground Floor	116	0		132	0		248	0
Lower Ground	0	0		0	0		0	0
Total	2,002	18	57	1,703	17	45	3,705	35

Table 3: GIA and Habitable Rooms Breakdown

Gross External Area						
	Social-Affordable Rent (Sqm)	Units	Private (Sqm)	Units	Total (sqm)	Units
Seventh Floor	0	0	0	0	0	0
Sixth Floor	0	0	0	0	0	0
Fifth Floor	45	0	429	4	475	4
Fourth Floor	323	3	403	4	726	7
Third Floor	422	4	296	3	718	7
Second Floor	422	4	296	3	718	7
First Floor	4322	4	272	3	694	7
Mezzanine	422	3	114	0	536	3

Ground Floor	122	0	139	0	261	0
Lower Ground	0	0	0	0	0	0
Total	2,177	18	1,950	17	4,127	35

Table 4: GEA Breakdown

- 1.9 The development is providing a mix of affordable and market units. The inclusion of two tenure types is in line with policies that seek to ensure that housing developments deliver a range of products suitable for the context, size, type and tenure of housing needed for the whole community (NPPF, Paragraph 61).
- 1.10 As is set out in the Local Plan, the affordability of intermediate products in Camden is challenging given the higher land values in the Borough and it is confirmed that the guidelines on tenure mix will be applied flexible, and that the LB Camden may, in certain circumstances support proposal which only provide a single affordable tenure.
- 1.11 In line with Policy H7 (Large and Small Homes) of the Local Plan, the scheme will deliver a range of homes of different sizes which contribute to meeting the priorities set out within the Local Plan for Dwelling Size Mix. Table 1 of the Camden Local Plan identifies high priority for 2 Bedroom and 3 Bedroom Social-Affordable rented properties, 13 out of the 18 properties within this tenure are proposed to be either two or three bedroom which meets the priorities of the LB Camden.