



**EXTENSION TO EXISTING FIFTH FLOOR TO
PROVIDE 11 ADDITIONAL ROOMS**

**HOLIDAY INN LONDON CAMDEN LOCK
30 JAMESTOWN ROAD
LONDON NW1 7BY**

PLANNING STATEMENT

NOVEMBER 2022

1.0 INTRODUCTION

1.1 This statement has been prepared to accompany a full planning application to extend the existing fifth floor to provide 11 additional rooms at the Holiday Inn London Camden Lock, 30 Jamestown Road, London NW1 7BY. The application is submitted on behalf of 4C Group Ltd, the landowners.

1.2 The application comprises:

(1) Planning Application Form and Ownership Certificate

(2) Application Drawings prepared by Studio Moren Architects:

1808-A-000 001 P0 – Location Plan (1:1250@A3)

1808-A-025 001 P0 – Existing Ground Floor Plan (1:100@A1)

1808-A-025 002 P0 – Existing Mezzanine Floor Plan (1:100@A1)

1808-A-025 003 P0 – Existing Fifth Floor Plan (1:100@A1)

1808-A-025 004 P0 – Existing Roof Plan (1:100@A1)

1808-A-025 010 P0 – Existing East Elevation (1:100@A1)

1808-A-025 011 P0 – Existing Regents Canal Elevation (1:100@A1)

1808-A-025 012 P0 – Existing South Elevation (1:100@A1)

1808-A-025 013 P0 – Existing Section A-A (1:100@A1)

1808-A-025 014 P0 – Existing Section B-B (1:100@A1)

1808-A-100 001 P0 – Proposed Ground Floor Plan (1:100@A1)

1808-A-100 002 P0 – Proposed Mezzanine Floor Plan (1:100@A1)

1808-A-100 003 P0 – Proposed Fifth Floor Plan (1:100@A1)

1808-A-100 004 P0 – Proposed Roof Plan (1:100@A1)

1808-A-110 001 P0 – Proposed East Elevation (1:100@A1)

1808-A-110 002 P0 – Proposed Regent's Canal Elevation (1:100@A1)

1808-A-110 003 P0 – Proposed South Elevation (1:100@A1)

1808-A-120 001 P0 – Proposed Section A-A (1:100@A1)

1808-A-120 002 P0 – Proposed Section B-B (1:100@A1)

(3) Design and Access Statement prepared by Studio Moren Architects, November 2022

- (4) Planning Statement prepared by Paul Dickinson and Associates, Town Planning and Development Consultants, November 2022
- (5) Heritage and Townscape Statement prepared by Bidwells, November 2022
- (6) Sustainability and Energy Statement prepared by Sabinus Building Services Ltd, November 2022
- (7) Noise Impact Assessment rev. A prepared by Emtec, 9 November 2022
- (8) Servicing Management Plan, November 2022
- (9) Site Waste Management Plan, November 2022
- (10) Construction Management Plan prepared by Paul Dickinson and Associates, Town Planning and Development Consultants, November 2022
- (11) Fire Statement – Form 4 – Reasonable Exemption Statement dated 7 November 2022

1.3 The application follows a pre-application submission made by Studio Moren Architects in 2021. However this was for a very different scale and nature of proposed development comprising a part two, part three storey roof extension (1,476m² additional floorspace) providing an additional 53 extra bedrooms together with a rooftop bar and terrace. The Council's pre-application advice letter raises a number of issues including the principle of development, the housing requirements of Policy H2, heritage and design, impact on neighbouring land uses, transport, energy and biodiversity considerations. the applicants assessed that the scheme would be unviable with these requirements and has therefore dropped the proposals. the current proposals are much smaller and constitute 'minor development' involving only 199m² additional floor area and eleven additional rooms.

2.0 DESCRIPTION OF DEVELOPMENT

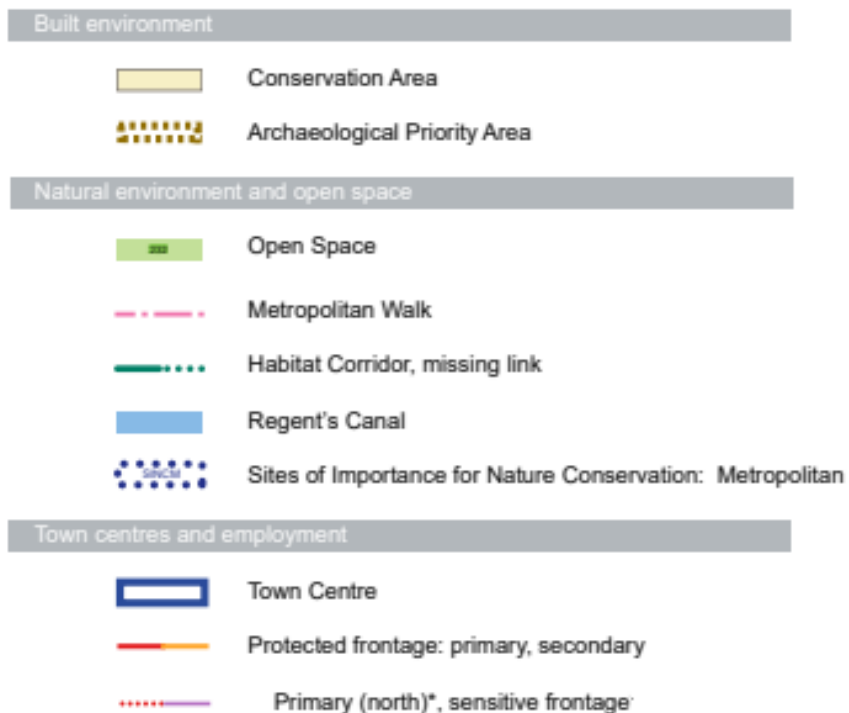
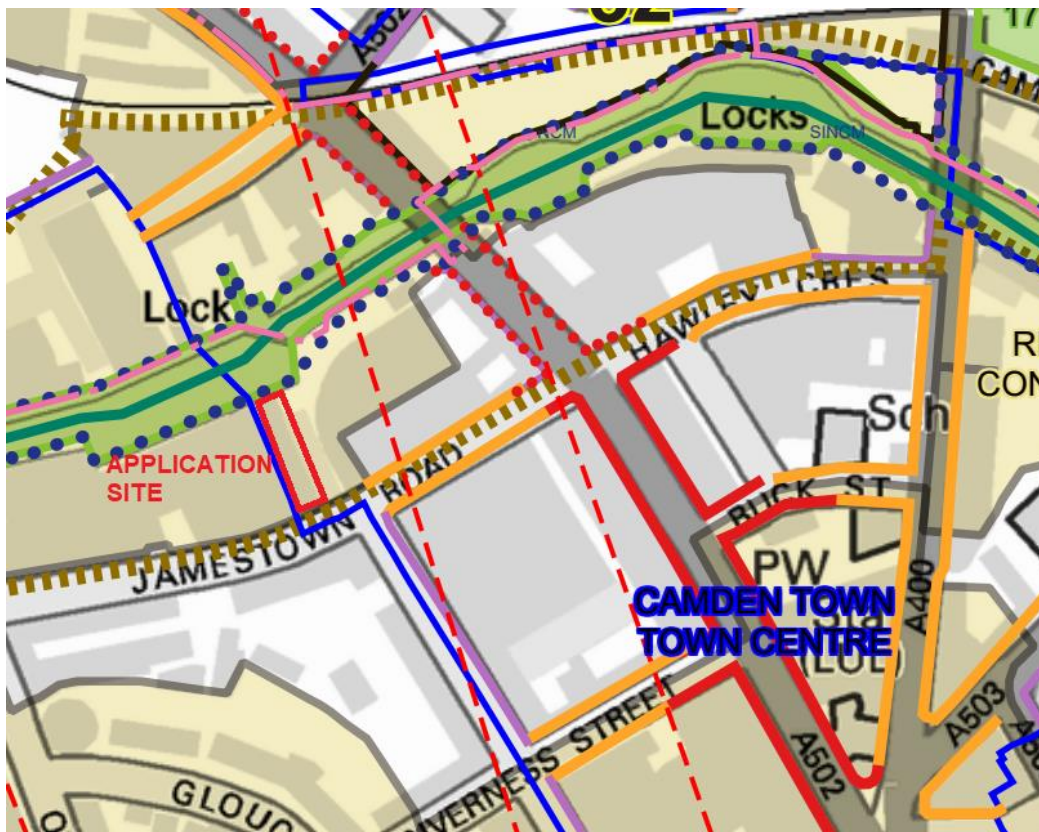
2.1 The property comprises the Holiday Inn London Camden Lock which provides hotel accommodation comprising 130 bedrooms together with a restaurant and bar, fitness centre, meeting and conference rooms and business/IT hub. The

proposal seeks to enlarge the existing fifth floor and reconfigure the floor layout to provide additional 11 rooms. The existing building has a large rectangular lightwell on the western side adjacent to No. 32 Jamestown Road. The lightwell extends from the fifth floor down to the second floor. The proposal includes the demolition of part of the first floor to extend the lightwell down to the roof of the ground floor and insert a rooflight to provide additional natural light to that floor. The proposal also includes the reprovision of the existing internal and external plant from the existing fifth floor to the roof.

3.0 PLANNING ASSESSMENT

Principle of development

- 3.1 The site lies within the Camden Town Centre boundary (edged blue on the Local Plan policies map below). Policy TC2 states that the Council will promote successful and vibrant centres throughout the Borough to serve the needs of residents, workers and visitors. The site lies within a predominantly commercial area which includes retail, pubs, restaurants and other visitor attractions.
- 3.2 Local Plan Policy E3 (Tourism) recognises the importance of the visitor economy in Camden and seeks to support tourism development and visitor accommodation. Specifically it supports smaller scale accommodation visitor in town centres including Camden Town. The sub-text to the policy notes that the Council will generally consider large scale developments to be those that provide additional floorspace of 1000 m² or more. The proposals are well below this threshold.
- 3.3 The policy also requires new tourism development to be easily reached by public transport, provide necessary pick up and set down points, not harm the balance and mix of uses in the area and not lead to the loss of permanent residential accommodation. I address each of these points later in this statement.



Extract of Local Plan Policies Map

- 3.4 National policy at paragraph 86 of the Framework states that planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation. Main town centre uses including tourism development such as hotels should be directed to town centres which are the most sustainable locations that limit the need to travel and offer a genuine choice of transport modes.

Employment policies

- 3.5 The Local Plan para. 5.1 notes that Camden has a large number of jobs in the hotel sector. The Council is keen to maintain and build on successful sectors such as hotels by encouraging investment that supports business growth creating further job opportunities for Camden residents and developing the infrastructure that will help existing businesses to thrive.
- 3.6 The hotel has identified a consistent demand for additional rooms. The hotel is regularly full and benefits from above average occupancy rates which is all indicative of a strong unmet demand. Guests who cannot be accommodated are having to travel into and out of the area because they cannot find suitable local accommodation. The additional 11 rooms will contribute to the local visitor economy and added visitor expenditure in the local area.
- 3.7 The proposal would comply with the main policy objectives of Local Plan Policy E1 (Economic development) to secure a successful and inclusive economy in the Borough by creating conditions for economic growth and harnessing the benefits for local residents and businesses. The proposal would continue to support and maintain the existing 45 FTE staff working in the hotel. The applicants have identified a need for two additional FTE workers (housekeeping staff) to serve the additional 11 rooms. No other additional staff would be required. The contribution to the local economy would be consistent with national policy which requires significant weight to be given to the need to support economic growth and productivity (para. 81 to the Framework).
- 3.8 The hotel caters for both leisure and business visitors. The hotel includes a business centre and meeting and conference rooms. It therefore supports local

businesses and provides a suitable venue for business related events, conferences etc. as well as meeting the needs of business visitors.

- 3.9 The proposal accords with London Plan Policy SD6 (Town centres and high streets) sub policy G which states that tourism infrastructure such as hotels in town centre locations should be enhanced and promoted. It also accords with London Plan Policy E10 (Visitor infrastructure) which states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, visitor experience and supporting infrastructure in locations well connected by public transport, taking into account the needs of business as well as leisure visitors.

Character of the area

- 3.10 Policy TC2 states that within the Camden Town Centre the Council will promote successful and vibrant centres throughout the Borough to serve the needs of residents, workers and visitors. As described above, the site lies within a predominantly commercial area which includes retail, pubs, restaurants and other visitor attractions. To the east there are office uses on upper floors and the adjacent building to the west (No. 32) is also offices. There are some residential uses on upper floors of commercial buildings on the opposite (south) side of Jamestown Road.
- 3.11 The proposal would create additional hotel floorspace on the fifth floor which would support the vitality and viability of the town centre without harm to its overall character, quality and attractiveness. The proposal will not affect the character and appearance at street level (the site is not within a protected frontage). The proposals are small scale. They represent only a 3% increase in overall floor area and an 8% increase in the number of bedrooms. The small-scale nature of the proposals therefore would not have any material impact on the overall character of the area and would comply with policies TC2 and TC4.

Heritage and design

- 3.12 The site is located within the Regent's Canal Conservation Area wherein the council has a statutory duty under S72 to the LBCAA 1990 to pay special

attention to the desirability of preserving or enhancing the character or appearance of the area. There are also nearby listed buildings or structures including the canal towpath bridge and roving bridge and other canalside buildings. Local Plan Policy D1 seeks to secure high quality design which respects local context and character and which preserves or enhances the historic environment and heritage assets in accordance with Policy D2. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings including conservation areas and listed buildings. The Council will not permit development that results in harm to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh the harm.

- 3.13 A Heritage and Townscape Statement prepared by Bidwells is submitted with the application. This assesses the proposed development within the historic context including the setting of the Regent's Canal Conservation Area and nearby listed buildings nearby and also provides a townscape assessment. The report concludes that while the proposals will alter views of the site, the continued use of the existing design rationale while retaining existing proportions and material contrast of the roofscape and replicating the curve and set back of the existing upper floors will ensure the overall character of the site will stay the same. The site will remain consistent with the prevailing roof heights of neighbouring buildings.
- 3.14 The assessment has also carefully considered longer views along the canal reflecting the setting of a number of heritage assets associated with the historic industrial infrastructure along the canal. the assessment concludes that the proposals will be slightly more visible in these views, by virtue of the increase in height, but this does not alter the way in which the site currently contributes to the setting of these assets the proposal is therefore considered to have an overall neutral impact on the significance of the conservation area and nearby listed buildings.
- 3.15 Based on this evidence, I consider that the proposed development does not result in either substantial or less than substantial harm to the significance of designated heritage assets and therefore does not engage either paragraphs 201 or 202 of the Framework. In any event I consider there are public benefits

to the proposal including supporting the vitality and viability of the town centre, contributing to the needs of both leisure and business visitors, and maintaining and enhancing job opportunities at the hotel. I concur with the conclusion of the report that the proposals would preserve the character and appearance of the Conservation Area and would therefore accord with the statutory duty at S72 of the 1990 Act and relevant heritage policies of the Local Plan and the Framework.

Quality of new accommodation

- 3.16 Policy D1 of the Local Plan requires development to be inclusive and accessible. The proposed additional rooms are designed to be disabled and wheelchair compliant. The fifth floor is served by existing lifts which are DDA compliant and corridors and rooms also provide for disabled access. The proposed new rooms with all have access to natural daylight albeit in some cases this would be limited to views into the internal courtyard. However as hotel rooms it is considered that the quality of accommodation would be acceptable.

Impact on neighbouring land uses

- 3.17 Local Plan policy E3 supports tourism development in the Borough provided it does not harm residential amenity. Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours in terms of visual privacy and outlook, sunlight and daylight, transport impacts, noise and vibration etc. Policy A4 also deals with noise and vibration.
- 3.18 The proposed extension at fifth floor follows the footprint and floor plan of lower floors although it retains a recess along the eastern edge of the building. Windows to the new rooms will therefore be in the same position as existing windows on lower floors (or set back along the eastern facade). The nearest buildings to the east and west are both offices on upper floors. To the South there is some limited residential use on upper floors of buildings on the opposite side of Jamestown Road. However because of the angled views and generous separation distances there would be no material overlooking or loss of privacy. Similarly because the proposal only involves limited infilling and enlargement of the existing 5th floor there would be no material loss of natural

light or overbearing effects to neighbouring properties. I deal with transport effects in the following section.

- 3.19 A Noise Impact Assessment prepared by Emtec Products Ltd is submitted with the application. The assessment considers potential noise levels resulting from the reprovision of plant onto the roof and identifies the nearest residential and or commercial properties that might be affected by noise from the new plant in accordance with the requirements of Policy A4 and Appendix 3 to the Local Plan. The report recommends the need for a screen around the plant compound to provide suitable noise reduction measures. It also recommends that the fans and air handling units should be fitted with atmospheric silencers to reduce noise to acceptable levels. The plant compound screen at the rear and side should be a solid acoustic panel with an inner acoustically absorbent surface to provide the required attenuation. These measures will ensure no unacceptable noise levels to nearby properties and that the noise level in the proposed additional bedrooms is below the acceptable noise level for uninterrupted sleep recommended by the WHO and included in BS8233:2014.

Transport considerations

- 3.20 Appendix A to the Council's Transport CPG sets out relevant thresholds for the preparation of transport information in support of different types and sizes of proposals. The proposed development is well below the threshold of 50 or more additional beds or 1000m² which requires a full transport assessment. It is also below the floorspace threshold of 200m² requiring a transport statement but is marginally above the threshold of 10 bedrooms. This section therefore provides an assessment on transport impacts of the additional 11 rooms. This assessment is also provided in a separate Transport Statement submitted with the application. The level of detail provided is considered appropriate given the small scale and additional nature of the development.
- 3.21 Local Plan Policy T1 promotes sustainable transport by prioritising walking, cycling and public transport in the Borough. As noted above, Policy E3 supports tourism development, provided that visitor accommodation is easily reached by public transport.

- 3.22 The site is in a highly sustainable urban centre location. The site lies within an area with excellent public transport accessibility (PTAL rating of 6a) which means it is easily accessible by public transport and therefore accords with policies T1 and E3. Camden Town Underground Station is less than 5 minutes' walk (380 metres) and Camden Road railway station is 8 minutes' walk (650 metres). Mornington Crescent Underground Station is 12 minutes' walk (960 metres). There are bus stops at Camden Town Station/High Street (Routes 24, 27, 31 and 168) (370 metres) (5 mins), Camden Town/Parkway (Routes C2 and 274) (5 mins), Camden Street/Camden Gardens (Route 46) (6 mins) and Camden Town/Bayham Street (Routes 29 and 253) (500 metres) (6 mins). Thus there are 12 different bus services all within 6 minutes' walk of the site.
- 3.23 The hotel has undertaken surveys to assess the most popular modes of travel for both hotel guests and staff. See the attached table. This indicates that nearly half (46%) of all hotel guests arrive by tube. The next most popular modes are train/overground (30%) and taxi (16%). Less than 3% of hotel guests arrive by their own or shared car. The vast majority of staff live within Camden Borough. This is borne out by the results of the staff survey. 46% of staff travel to work by tube (a similar figure to hotel guests), 29% by bus and 16% by train/DLR/overground. The results confirm that the hotel is well located to make use of non-car modes of travel.
- 3.24 London Plan Policy T5 (Cycling) and Table 10.2 (Minimum cycle parking standards) indicate that cycle parking for hotels should be provided at a minimum standard of 1 long-stay space per 20 bedrooms and 1 short-stay space per 50 bedrooms. Guests and staff are currently able to store cycles in the luggage/cycle store in the ground floor. The proposal includes provision of a double cycle rack which will provide 2 no. cycle spaces and therefore would comply with the London Plan standard in respect of the 2 additional rooms. As an employee benefits, the Company operates a 'Cycle to Work' scheme available to all staff members which provides financial assistance for the purchase of a bicycle. Staff have access to showers. There is a Santander public hire cycle docking station immediately opposite the hotel which is used regularly by visiting guests and therefore encourages non car modes of travel.

- 3.25 The London Plan encourages car free developments in sustainable urban centre locations. London Plan Policy T6.4 (Hotel and Leisure Use Parking) states that within the Central Activities Zone and locations of PTAL 4-6 (as here) any on-site provision should be limited to operational needs, disabled parking and parking required for taxis, coaches and deliveries/servicing. The PTAL6a rating confirms that the hotel is well located to a range of public transport services and provision is made for additional covered and secure cycle parking spaces so that non-car modes of travel are an attractive and realistic choice for employees.
- 3.26 In conclusion, it is considered that the hotel is in an excellent accessible location within easy walking distance of shops, services, facilities and attractions within Camden Town centre, and with easy access to a range of public transport services including bus, rail and underground stations, and with a public cycle hire docking station immediately opposite the hotel. The additional demands generated by 11 more rooms would be minimal within the overall context of the hotel and its town centre location such That it would not have any severe impacts on the local network. It would be well located to encourage and maximise travel by walking and cycling and other public and non-car modes of travel and therefore accords with national policy and London Plan and Camden Plan policies in relation to sustainable development.

Waste collection and servicing arrangements

- 3.27 Local Plan Policy CC5 (Waste) aims to reduce the amount of waste produced in the Borough and increase recycling and the reuse of materials to ensure that developments include suitable facilities for the storage and collection of waste and recycling. The Council's Design CPG provides further guidance.
- 3.28 The hotel has a commercial waste collection contract with a private operator involving regular collection of waste (minimum 3 times a week) from the loading bay area on the eastern side of the building. This will continue unchanged. The hotel has an existing dedicated and covered refuse storage area immediately adjacent to the ground floor loading bay on the eastern side of the building. Currently the hotel has 3 x 1100 litre mixed recycling and 2 x 1100 litre general waste Eurobins and separate food waste containers. The current waste capacity has proved to be more than adequate to meet the existing

needs of the hotel. The additional 11 rooms are not expected to significantly increase the overall waste capacity needs of the hotel beyond the current capacity available in the storage area. Additionally the Hotel Charter and the Company's strong net zero commitment includes measures to reduce, re-use and recycle wherever possible. The Company has introduced a procurement strategy in terms of waste management to ensure that waste is reduced and eliminated as much as possible (it is noticeable that food suppliers etc. are also increasingly reducing packaging leading to less waste). Given this strategy and the minimal additional waste generated by 11 more rooms, it is not envisaged that any additional bins will be required. The proposal therefore accords with Policy CC5.

- 3.29 Local Plan Policy T4 promotes the sustainable movement of goods and materials and seeks to minimise the movement all goods and materials by road. A draft Construction Management Plan is submitted with the application. This seeks to provide some information at this early stage in relation to how demolition and delivery of construction equipment and materials will be addressed. Further details can be secured by a planning condition.

Energy and sustainability

- 3.30 Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The London Plan energy policy SI2 only applies to major developments (defined as more than 1000m² or 1ha site area). The Camden policy repeats this but also requires all developments to reduce CO₂ emissions. The supporting text to the policy explains that all developments of 500m² or more will be required to submit an energy statement demonstrating how a 20% reduction in CO₂ emissions from on-site renewables has been achieved. The proposed development is well below this threshold.
- 3.31 Local Plan para 8.49 states that the Council will expect the application of a BREEAM assessment to non-residential developments (including conversions, extensions and changes of use) of 500m² or more. Again the proposed development is below this threshold. The Council's Energy CPG acknowledges that it may not be realistic or practical to expect smaller developments under

500m2 to comply with BREEAM requirements, but it still expects any sustainability statement to demonstrate how sustainable design and construction principles and climate change adaptation measures have been incorporated into the design as far as practically possible.

- 3.32 The Energy and Sustainability Statement prepared by Sabinus Building Services Ltd demonstrates how the proposal will meet the generic policy objective that all developments should reduce CO2 emissions (although there is no target specified in the policy for developments of less than 500m2). The Statement explains how the enlargement of the fifth floor to provide 11 additional rooms will use less energy and provide renewable energy through passive design measures, improved fabric performance and renewables.

Flood risk

- 3.33 The site is in flood zone 1 (lowest risk of flooding). There would be no material change in building footprint or impermeable area that would affect flood risk or surface water drainage.

Fire safety

- 3.34 A Fire Statement (Reasonable Exemption Statement) is submitted with the application. This is a minor development in floorspace terms. It is a non-major development that does not create any additional self-contained units, alter the materials on the external walls or the internal or external communal areas that support the evacuation strategy for the property. The proposed development would not affect access for equipment for fire-fighting or assembly points. It would not affect the ability of fire appliances to continue to serve the existing building from either Jamestown Road or the road adjacent to the east side of the building.

4.0 CONCLUSION

- 4.1 The application seeks to extend the existing fifth floor to provide 11 additional rooms. It involves net additional floor area of 199m2. The hotel has identified a consistent demand for additional rooms. It is regularly full and has an above average occupancy rate which is indicative of a strong unmet demand.

- 4.2 The additional 11 rooms would contribute to the local visitor economy and added visitor expenditure in the local area. The proposal would support and maintain the existing 45 FTE staff and there would be a need for 2 additional FTE workers (housekeeping staff) in relation to the additional rooms. It would comply with Local Plan policies which seek to direct additional hotel accommodation to the most accessible and sustainable locations within town centres. The proposal also accords with London Plan Policies SD6 (Town centres and high streets) and E10 (Visitor infrastructure).
- 4.3 Paragraph 81 to the Framework requires significant weight to be given to proposals which support economic growth and productivity. The hotel caters for both leisure and business visitors and has a business centre and meeting and conference rooms. It supports local businesses and provides a suitable venue for business related events, conferences etc. as well as meeting the needs of visitor business visitors.
- 4.4 The proposals comply with Local Plan Policy E3 (Tourism) which seeks to ensure that tourism development including hotels can be easily reached by public transport, provide necessary pick up and set down points, would not harm the balance and mix of uses in the area and would not lead to the loss of permanent residential accommodation. The hotel is in a highly sustainable urban location within the Camden Town Centre boundary and with excellent public transport accessibility (PTAL rating of 6a). It is within 8 minutes' walk of underground and railway stations and there are 12 different bus services within 6 minutes' walk of the site. The high PTAL rating and proximity/range of public transport services, together with the results of the hotel's own guest and staff survey, confirms that it is easily reached by public transport and offers realistic opportunities for sustainable modes of travel. The hotel already provides a necessary pick up and set down point. The hotel lies within a predominantly commercial area which includes retail, pubs, restaurants and other visitor attractions. The additional rooms would support the vitality and viability of the town centre without harm to its overall character, quality and attractiveness.
- 4.5 The proposal constitutes sustainable development which supports the three overarching objectives at paragraph 8 to the Framework:

- (a) economic objective – The proposal contributes to the supply of hotel rooms in the Borough and supports the local visitor economy through direct and indirect expenditure. It maintains and protects existing employment (45 FTE staff) within the existing hotel and creates 2 additional FTE staff.
- (b) social objective – The proposal would make an additional contribution to supporting the social infrastructure in the town centre and by protecting and increasing local jobs to support the community.
- (c) environmental objective – The proposal provides additional hotel accommodation without any harm to the natural, built and historic environment and by encouraging non-car modes of travel.

4.6 The proposal therefore comprises sustainable development which would support the Council's tourism and employment policies in a highly accessible urban location without any identified harm. As such it would comply with Local Plan policies G1, E1, E3, A1, A4, D1, D2, TC2, TC4, CC1, T1 and T2 and relevant policies in the Framework.

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11 November 2022