

<b>Address:</b>	303-306 Northumberland House High Holborn London WC1V 7JZ		<b>2</b>
<b>Application Number(s):</b>	2025/5750/P	<b>Officer:</b> Lauren Ford	
<b>Ward:</b>	Holborn and Covent Garden		
<b>Date Received:</b>	18/12/2025		
<b>Proposal:</b>	Change of use from office and retail (Class E) to hotel (Class C1), replacement of windows, alterations to shopfronts, removal of external escape stair, blue / green roofs, generator to the rear at lower ground floor level, and changes at roof level including PV's, lift overrun, and associated works.		

**Background Papers, Supporting Documents and Drawing Numbers:**

**Drawing numbers:**

1543\_001 Location Plan

Existing Drawings:

1543\_009 Existing Level -1 (Lower Ground); 1543\_010 Existing Level 0 (Ground);  
1543\_011 Existing Level 1; 1543\_012 Existing Level 2; 1543\_013 Existing Level 3;  
1543\_014 Existing Level 4; 1543\_015 Existing Level 5; 1543\_016 Existing Level 6;  
1543\_017 Existing Level 7; 1543\_018 Existing Level 8; 1543\_019 Existing Level 9 (Plant);  
1543\_020 Existing Level 10 (Roof); 1543\_025 Existing Elevations 1; 1543\_026 Existing  
Elevations 2; 1543\_027 Existing Sections.

Proposed Drawings:

1543\_109, Revision A, Proposed Level -1 (Lower Ground); 1543\_110, Revision A,  
Proposed Level 0 (Ground); 1543\_111, Revision A, Proposed Level 1; 1543\_112, Revision  
A, Proposed Level 2; 1543\_113, Revision A, Proposed Level 3; 1543\_114, Revision A,  
Proposed Level 4; 1543\_115, Revision A, Proposed Level 5; 1543\_116, Revision A,  
Proposed Level 6; 1543\_117, Revision A, Proposed Level 7; 1543\_118, Revision A,  
Proposed Level 8; 1543\_119, Revision A, Proposed Level 9 (Plant); 1543\_120, Revision  
C, Proposed Level 10 (Roof); 1543\_125, Revision B, Proposed Elevations 1; 1543\_126,  
Revision A, Proposed Elevations 2 ; 1543\_127, Revision A, Proposed Sections.

Supporting documents:

Cover Letter prepared by Savills, 18 December 2025; Design and Access Statement prepared by the Manser Practice, December 2025; Planning Statement Prepared by Savills, December 2025; Hotel Management Plan, December 2025 ; Preliminary Plant Noise Assessment prepared by Ramboll, 2025/12/165; Marketing Report prepared by HK London, 15<sup>th</sup> December 2025; Transport Assessment prepared by Curtins, 17 December

2025; Outline Travel Plan prepared by Curtins, 17 December 2025; Outline Delivery & Servicing Management Plan prepared by Curtins, 17 December 2025; Statement of Community Involvement prepared by Concilio, December 2025; Air Quality Assessment prepared by Socotec; Construction/ Demolition Management Plan Pro-Forma; Energy Assessment Prepared by Eight Versa, 17/12/2025; London Plan Fire Statement prepared by Jensen Hughes; Overheating Analysis prepared by Eight Versa, 16/02/2026; Preliminary BREEAM Assessment prepared by Eight Versa, 30/01/2025; BREEAM 2014 Refurbishment and Fit Out Score; Contractor's Requirements prepared by Eight Versa, 30/01/2025; Flood Risk Assessment and Drainage Strategy prepared by Curtins, 28 January 2026.

**RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement.**

<b>Applicant:</b>	<b>Agent:</b>
Queensway c/o Savills	c/o Savills celia.smithking@savills.com 33 Margret Street London W1G 0JD

**ANALYSIS INFORMATION**

<b>Land use floorspaces</b>				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E(g)(i)	Office	2,812.8	0	- 2,812.8
E(a)	Display/sale of goods other than hot food	451.4	0	- 451.4
C1	Hotel	0	3,133.9	3,133.9
<b>Total</b>	<b>All uses</b>	<b>3,264.2</b>	<b>3,133.9</b>	<b>- 130.3</b>

<b>Parking details</b>			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	0	0	0
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	10	+10
Cycle – short stay	5	2	-3

## EXECUTIVE SUMMARY

- i) The application site at 303-306 High Holborn (Northumberland House) is a nine storey (plus basement) building within the Bloomsbury Conservation Area, Central London Area, High Holborn Centre and Central Activities Zone (CAZ). It is highly accessible, near Chancery Lane and Holborn stations.
- ii) The proposal is a change of use of the building from office and retail (Class E) to hotel (Class C1). External alterations are limited to replacement windows, alterations to the shopfront, removal of the rear external escape stairs, blue / green roofs, an emergency generator within an acoustic enclosure to the rear at lower ground floor level and changes at roof level including lift overrun and PV's.
- iii) While the proposal would result in the loss of an employment use, the proposed change of use to hotel (Class C1) is considered acceptable in this instance and in compliance with the development plan taking account of the specific circumstance of this case. This application is supported by two-plus years of marketing evidence, which demonstrates a lack of demand for the Class E office space. The fundamental changes within the occupier market, increasing vacancy rates of the office space within this area and the constraints posed by the existing building demonstrate why the site is not suitable for continued office use.
- iv) The building would be retained in an active employment generating use, with a loss of employment space contribution and training package to be secured by Section 106 agreement.
- v) The loss of two ground floor retail units is not considered to unacceptably harm the character, function, vitality or viability of the area. The units are currently vacant and there is a lack of demand for their continued use. The proposal would provide active frontage through a publicly accessible restaurant/bar at ground floor level, which would increase footfall and economic activity. A public access plan would be secured through a Section 106 agreement.
- vi) The site does not lend itself well to conversion to residential use given its location on High Holborn which poses noise and air quality concerns and given the sub-standard accommodation that would be provided.
- vii) The hotel use aligns with London Plan Policy E10 and Camden Local Plan Policy E3, supporting tourism and economic growth in a highly accessible location and within the CAZ.
- viii) External works are limited and would not harm the character or appearance of the Bloomsbury Conservation Area.
- ix) Subject to the recommended conditions and Section 106 obligations, the development would not harm neighbouring amenities, the local transport network or infrastructure.

## OFFICER REPORT

**Reason for Referral to Committee:** Development involving the change of use of more than 1,000 sqm of non-residential floorspace (Clause 3(ii)); and subject to the completion of a Section 106 legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).

### 1. SITE AND BACKGROUND

#### *Designations*

1.1 The following are the most relevant designations or constraints:

<b>Designation</b>	<b>Details</b>
Local Plan Centre	High Holborn
Conservation Area	Bloomsbury
PTAL (Public transport accessibility)	6b (excellent)
Underground development constraints and considerations	Subterranean (groundwater) flow
Central London Frontage	Primary frontage
Central London Area	

*Table 1 - Site designations and constraints*

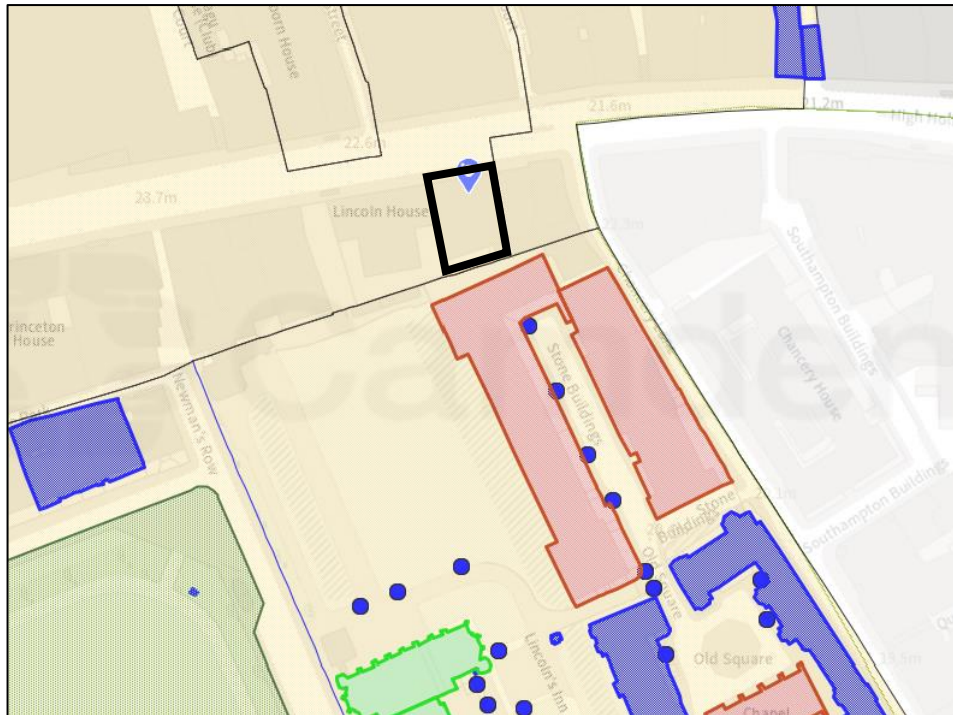
#### *Description*

1.2 Northumberland House is located at 303-306 High Holborn and comprises a building of nine storeys (plus basement level) located on the southern side of High Holborn.



*Figure 1- Streetview of 303-306 High Holborn (Northumberland House)*

- 1.3 The building comprises 3,206 sqm of floorspace and has a lawful Class E use (Commercial, Business and Service) comprising two retail units at ground floor level (451.4 sqm) and office space within the remainder of the building (2,812.8 sqm).
- 1.4 Currently, 51% of the building is vacant. Some office units have been vacant since as early as 2018. One retail unit has been vacant since 2021, and the other since September 2025.
- 1.5 Primary access to the building is via the main entrance off High Holborn. Two additional accesses are present to either side of the main entrance, providing access to each of the ground floor retail units.
- 1.6 The site is situated within the Bloomsbury Conservation Area. The building is not identified in the conservation area statement as being either a positive or negative contributor to the conservation area. There are a number of listed buildings within the surrounding environment. This includes Grade I listed buildings at 1-11 Lincoln's Inn and 15 Grade II listed lampposts on Lincoln's Inn, all located directly to the south of the application site. Figure 2 below shows the nearby heritage assets and the site.



*Figure 2 - Map of site and nearby heritage assets (conservation area shown in beige, Grade I listed buildings shown in red, Grade II listed buildings shown in blue and Grade II\* listed buildings shown in green).*

- 1.7 The surrounding area comprises a mix of uses, including other office buildings. Ground floor uses are predominantly retail (shops) and restaurants and cafes.
- 1.8 The site has a Public Transport Accessibility Level (“PTAL”) 6b which is considered ‘excellent’ and is the best possible rating. Chancery Lane and Holborn London Underground stations are located approximately 200m east and 400m west of the site and there is a bus stop located almost outside the premises.
- 1.9 The site is not in a local flood risk zone or a previously flooded street, however there a risk of surface water flooding identified in the vicinity of the building.

## **2. THE PROPOSAL**

- 2.1 The proposal seeks a change of use of the existing building from office and retail (Class E) to hotel (Class C1).
- 2.2 A broad summary of works include:
- 105 hotel rooms;
  - Reception, bar and café and refuse space at ground floor level;
  - 10 long-stay cycle spaces at ground floor level, and two visitor spaces to be secured on the public highway; and

- Plant equipment to be located within an existing enclosure at roof level.

2.3 No extensions are proposed. The external alterations include the following:

- Replacement windows;
- Changes to shopfronts/ground floor frontage;
- Green / blue roofs at 4<sup>th</sup> floor and roof level;
- Photovoltaic panels (PV's) at roof level;
- Removal of curved section of roof to allow for blue/ green roof and PV's;
- Lift overrun at roof level; and
- Emergency backup generator to the rear at lower ground floor level within an acoustic enclosure.

2.4 There is a slight decrease in floorspace (- 130.3sqm) due to new insulation on the inside face of external walls to improve energy performance. This does not relate to any external changes to the building.

2.5 The main access to the building would be in the middle of the frontage, as per the current situation. Two additional accesses are proposed to either side of the building which are to be used by staff and in emergencies.

### ***Revisions***

2.6 The Council requested revisions including changes to the roof slope (removal of the curved section of roof) to allow for the incorporation of additional sustainability measures (PV's and blue / green roofs), changes to the design of the front elevation windows to retain glazing bars and for windows to be made openable (apart from on the High Holborn elevation).

## **3. RELEVANT HISTORY**

### ***The site***

3.1 There is no relevant planning history at the site.

### ***The area***

3.2 This part of Holborn/High Holborn is undergoing significant change with major redevelopment schemes either under construction, recently granted or awaiting determination, including at the following sites.

3.3 **2024/1810/P (14 Bedford Row, 12-13 & 14 Jockey's Fields):** *Change of use from Office (Use Class E) to Apart-Hotel (Use Class C1), partial demolition of link structure, introduction of terrace, rooftop plant and other associated physical works. Granted* subject to a Section 106 Legal Agreement, 18/12/2024.

- 3.4 **319-332 High Holborn and 26 Southampton Buildings (Ref 24/01262/FULMAJ):** *Increasing 35000sqm to 58000sqm commercial floorspace (class E uses).* **Granted** 23/12/2025.
- 3.5 **Chancery Station House, 31-33 High Holborn (2023/5103/P):** **Change** of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works. **Resolved to be granted at committee**, subject to Section 106 legal agreement, 11/07/2024.
- 3.6 **Lion House, 72 - 75 Red Lion Street (2026/1030/P):** *Change of use from Office (Class E) to Hotel (Class C1), extensions at 7th floor level, creation of terraces, new and replacement windows, rooftop plant enclosure, green roofs, PV's, alterations to façade and associated works.* **Awaiting determination.**

#### 4. CONSULTATION

##### ***Statutory consultees***

##### Thames Water

- 4.1 No objection subject to the inclusion of informatives on the planning permission relating to groundwater risk management permits, the use of water mains and capacity to the site.

##### Transport for London (London Underground)

- 4.2 Transport for London were consulted on the application. No response was received.

##### ***Local groups***

##### Bloomsbury Conservation Area Advisory Committee

- 4.3 The Bloomsbury Conservation Area Advisory Committee were consulted on the application. No response was received.

##### Bloomsbury Association

- 4.4 Bloomsbury Association were consulted on the application. No response was received.

## Covent Garden Community Association

4.5 A response was received from the Covent Garden Community Association which states that the windows should have openable sections to allow air to flow in from outside.

4.6 *Officer response - Openable windows are proposed on all elevations apart from the north elevation fronting High Holborn. Openable windows are not proposed on this elevation due to noise and air quality concerns.*

### ***Adjoining occupiers***

4.7 2 sites notices were displayed for the planning application on 29/12/2025 as follows:

- 1 site notice displayed outside application site on High Holborn; and
- 1 site notice displayed outside 76 Chancery Lane.

4.8 A press notice was displayed on 01/01/2026.

4.9 No comments were received.

## **5. POLICY**

### ***National and regional policy and guidance***

[National Planning Policy Framework 2024 \(NPPF\)](#)

[Draft National Planning Policy Framework 2025 \(Draft NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

### London Plan 2021 (LP)

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG3 Creating a healthy city](#)

[GG5 Growing a good economy](#)

[Policy SD4 The Central Activities Zone \(CAZ\)](#)

[Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

[Policy D4 Delivering good design](#)

[Policy D12 Fire safety](#)

[Policy D14 Noise](#)

[Policy E10 Visitor infrastructure](#)

[Policy E11 Skills and opportunities for all](#)

[Policy G1 Green infrastructure](#)

[Policy G5 Urban greening](#)

[Policy G6 Biodiversity and access to nature](#)

[Policy SI 2 Minimising greenhouse gas emissions](#)

[Policy SI 3 Energy infrastructure](#)

[Policy SI 4 Managing heat risk](#)

[Policy SI 12 Flood risk management](#)

[Policy SI 13 Sustainable drainage](#)

[Policy T1 Strategic approach to transport](#)  
[Policy T2 Healthy Streets](#)  
[Policy T3 Transport capacity, connectivity and safeguarding](#)  
[Policy T4 Assessing and mitigating transport impacts](#)  
[Policy T5 Cycling](#)  
[Policy T6 Car parking](#)  
[Policy T7 Deliveries, servicing and construction](#)  
[Policy T9 Funding transport infrastructure through planning](#)  
[Policy DF1 Delivery of the Plan and Planning Obligations](#)  
[Policy M1 Monitoring](#)

#### London Plan Guidance (LPG)

[Accessible London SPG](#)  
[Optimising Site Capacity: A Design-led Approach LPG](#)  
[Be Seen energy monitoring LPG](#)  
[Energy Planning Guidance](#)  
[The control of dust and emissions in construction SPG](#)  
[Whole life carbon LPG](#)  
[Sustainable Transport, Walking and Cycling](#)

#### ***Local policy and guidance***

#### Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)  
[Policy C5 Safety and security](#)  
[Policy C6 Access for all](#)  
[Policy E1 Economic development](#)  
[Policy E2 Employment premises and sites](#)  
[Policy E3 Tourism](#)  
[Policy A1 Managing the impact of development](#)  
[Policy A3 Biodiversity](#)  
[Policy A4 Noise and vibration](#)  
[Policy D1 Design](#)  
[Policy D2 Heritage](#)  
[Policy D3 Shopfronts](#)  
[Policy CC1 Climate change mitigation](#)  
[Policy CC2 Adapting to climate change](#)  
[Policy CC3 Water and flooding](#)  
[Policy CC4 Air quality](#)  
[Policy CC5 Waste](#)  
[Policy TC1 Quantity and location of retail development](#)  
[Policy TC2 Camden's centres and other shopping areas](#)  
[Policy T1 Prioritising walking, cycling and public transport](#)  
[Policy T2 Parking and car-free development](#)  
[Policy T3 Transport infrastructure](#)  
[Policy T4 Sustainable movement of goods and materials](#)  
[Policy DM1 Delivery and monitoring](#)

## Supplementary Planning Documents and Guidance

*Most relevant Camden Planning Guidance (CPGs):*

[Access for All - March 2019](#)

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Biodiversity - March 2018](#)

[Design - January 2021](#)

[Developer Contribution - March 2019](#)

[Employment sites and business premises - January 2021](#)

[Energy efficiency and adaptation - January 2021](#)

[Planning for health and wellbeing - January 2021](#)

[Transport - January 2021](#)

[Water and flooding - March 2019](#)

*Other guidance:*

Bloomsbury Conservation Area appraisal and management strategy (2011).

### Proposed Submission Draft Camden Local Plan (DCLP)

- 5.1 The [Proposed Submission Draft Camden Local Plan](#) was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.
- 5.2 Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.
- 5.3 The Proposed Submission Draft Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

## **6. ASSESSMENT**

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

<b>7</b>	<b>Land use</b>
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8	<b>Design and Heritage</b>
9	<b>Standard of Accommodation</b>
10	<b>Impact on Neighbouring Amenity</b>
11	<b>Transport</b>
12	<b>Sustainability and Energy</b>
13	<b>Air Quality</b>
14	<b>Trees, Greening and Biodiversity</b>
15	<b>Water and Flooding</b>
16	<b>Accessibility</b>
17	<b>Fire Safety</b>
18	<b>Employment and Training Opportunities</b>
19	<b>Refuse and Recycling</b>
20	<b>Community Infrastructure Levy</b>

## 7. LAND USE

### ***Loss of office use***

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period.
- 7.2 HK London have marketed four of the vacant units at the site for office use via various platforms, including a visible letting board since June 2023. Prior to 2023, marketing of the building was undertaken by Gryphon Partners.
- 7.3 Changes to the demand for office space has resulted in a 'flight to quality' in the occupier market, with occupiers gravitating to better quality floorspace in an effort to attract staff to the workplace. Whilst a range of quality office space is needed in the borough to cater for different-sized businesses, and the lack of high-quality specifications does not make the premises inherently unsuitable for business use, the quality of the space does result in less ability to attract tenants, as demonstrated through the marketing exercise undertaken.

7.4 There is an oversupply of vacant office space within the area. The submitted marketing assessment states that within a ½ mile radius of the site, there are currently 141 vacant floors of office space across 80 properties. Many of these provide higher quality spaces than at the application site.

7.5 51% of the building is currently vacant, and some of the units have been vacant since as early as 2018 (pre-covid). This percentage is expected to increase in the coming years (as demonstrated through Figure 3 below), as no existing tenants have sought to extend their leases.

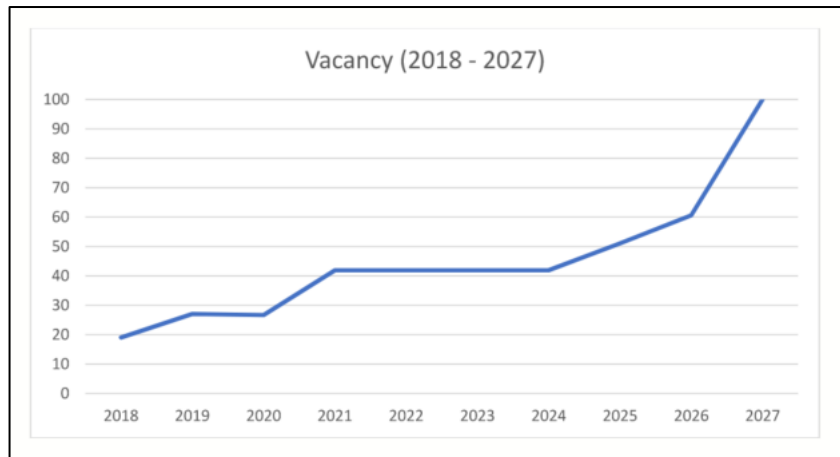


Figure 3: Vacancy rates at the application site (Source: Marketing Report, page 29)

7.6 An interest schedule has been submitted, containing viewings and enquiries. 115 occupier enquiries were discounted for reasons including location and specification/fit out, as shown through Figure 4 below.

REASON	NO. ENQUIRIES	PERCENTAGE
Location	33 x	29%
Specification / Fit Out	23 x	20%
Size (Too Small)	19 x	17%
No Response	18 x	15%
Signed Elsewhere	15 x	13%
Budget	4 x	3%
Size (Too Big)	2 x	2%
Requirement Not Active (Market Research)	1 x	1%
<b>TOTAL</b>	<b>115</b>	<b>100</b>

Figure 4: Enquiries, and reasons for discounting (Source: Marketing Report, page 33)

7.7 Location is shown in Figure 4 above as being the main reason for discounting, noting that the site is in a highly accessible location. The

applicant has provided reasoning as to why the site's location has been discounted by prospective occupiers:

- Occupiers are prioritising location more and more, with a specific push to be located in close proximity to crossrail stations. Since, covid, the smaller office markets such as midtown have seen a decline, with occupiers looking at either the city, Kings Cross or west end where there is a significant cluster of knowledge.
- There is a lack of amenity in proximity, which has also become increasingly important.
- While the site is well connected in PTAL terms, it sits in the middle of two tube stations rather than right next to one. As such, if given the choice, an occupier would chose an office closer to a tube, unless the building was Prime or Grade A (which the application building is not).

7.8 Guiding rents range from £45.00 psf to £55.00 psf depending on the quality of the space. The advertised rent rates are considered average for the area and type of office space

7.9 Constraints of the existing building include low floor-to-ceiling heights, inefficient floorplates, lack of natural light and an inflexible, inaccessible core. The premises also has poor sustainability credentials, with a current EPC rating of D. The building is not considered to currently be in a reasonable condition to allow the use to continue without redevelopment, which would come at a substantial cost financially.

7.10 Some lettings of office space within the application building have been carried out since HK London began marketing the building, to maintain occupancy and revenue. As detailed within the submitted marketing report, this is not a sustainable long-term arrangement as the occupancy of the building is decreasing at a faster rate than can be replaced with new transactions (as demonstrated through Figure 3 above).

7.11 The fundamental changes within the occupier market, increasing vacancy rates of the office space within this area and the constraints posed by the existing building demonstrate why the site is not suitable for continued office use.

#### ***Loss of retail space***

7.12 London Plan Policy E9 allows for the redevelopment of surplus retail space where it supports other planning objectives.

7.13 Policy TC2 (Camden's centres and other shopping areas) seeks to protect primary frontages as locations with a high proportion of shops to maintain the retail function of the area.

- 7.14 The site is within a primary frontage area and contains two vacant retail units at ground floor level. One has been vacant since 2021, and the other since September 2025. The aforementioned unit has been marketed since 2023. There is no current interest in the retail units.
- 7.15 While policy seeks to protect primary frontages as locations with a high proportion of shops, the proposal includes a restaurant/bar at ground floor level which would bring vacant retail units back into an active use, thereby assisting with retaining interest and interaction for passing pedestrians at the ground floor level helping support the remaining retail uses within this primary frontage area. This area would be accessible to members of the public and visible to passing foot traffic. A public access plan would be secured through a Section 106 agreement to ensure that the ground floor does not become an inaccessible space by enabling members of the public to continue to enter and use this space.
- 7.16 While both the restaurant/bar and hotel would be accessed via the main front entrance, the additional access in the northeastern corner of the building ensures that the potential for a future retail unit in this location is retained.
- 7.17 There is a clear lack of demand for the continued retail use of the units. The proposal would provide active frontage through a publicly accessible restaurant/bar which would increase footfall and economic activity. In this instance, the loss of retail space would not unacceptably harm the character, function, vitality or viability of the area.

***Compensation for loss of employment space***

- 7.18 As per paragraph 54 of the Employment Sites and Business Premises CPG, in these circumstances, where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution from developers towards measures which create or promote opportunities for employment or training of local people. A contribution will only be sought in cases where the net loss of employment space is 500 sqm (GIA) or more. The contribution will be held by the Council and used to support activities that create or promote opportunities for employment or training, which could include providing affordable employment space in the borough.
- 7.19 The calculation below is set out in paragraph 60 of the Employment Sites and Business Premises CPG which calculates the amount of jobs based on floor area however as the submission has already calculated the existing full time jobs on site, these figures are accepted.
- 7.20 FT jobs expected in employment use:  $2812.8 / 12 = 234$  FT jobs.
- 7.21 Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use):  $234 - 50 = 184$  FT jobs.

7.22 Full time jobs lots  $184 \times 21\% = 38$  [% of residents who work in Camden]  $38 \times \pounds 3,995$  [cost to provide training per employee] =  $\pounds 151,810.00$ .

7.23 The contribution amount ( $\pounds 147,815.00$ ) for the loss of employment space will be secured by Section 106 legal agreement.

### ***Preferred residential use***

7.24 Policy H1 (a) and (d) regard housing as the priority land use of the Local Plan and make housing the top priority when considering the future of unused and underused land and buildings. While Policy H1 makes housing the priority for land use when considering the future of unused and underused land and buildings, it is recognised that there are other development plan policies that support hotel use in this location. This includes London Plan policies E10, SD4 and SD5, as well as Local Plan Policy E3 which supports hotels within the CAZ. It is recognised that Policy H1 is worded in such a way as to require consideration of housing for the future of unused buildings but does not prevent applications being submitted for other uses, and the Council would not have a strong policy basis for refusing an application at this site for an alternative use to housing.

### **Residential study**

7.25 During pre-application discussions the applicant produced a residential study which explored the potential for providing residential on the site. The study was undertaken to see how the building could be converted to residential. As shown through Figure 5 below, 31 residential units could be accommodated, 65% of which would be single aspect and 25% would be single aspect north facing.



**Figure 5: Possible proposed residential floor plans (Source: Design and Access Statement, Section 4.3)**

7.26 Issues with providing residential on-site are shown and detailed through Figure 6 below and as follows:

- Single aspect rooms with no amenity space;
- Compromised layouts and room sizes due to replacement of existing core which is required to be twice as large as the existing core, resulting in a loss of 25sqm internal area at each level;
- Undersized units;
- Lack of natural light to some areas;
- Shallow floorplates; and
- Noise and air quality implications for flats facing High Holborn.

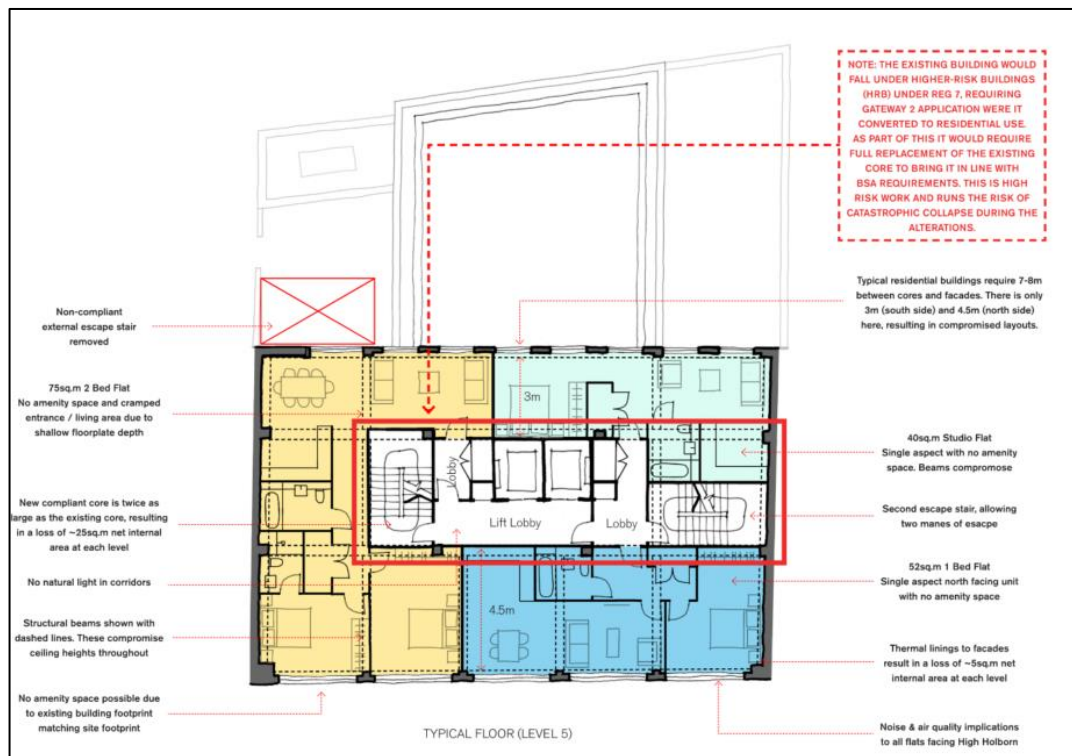


Figure 6 – Issues associated with providing residential on-site (Source: Design and Access Statement, Section 4.3)

7.27 In this instance, given the building's location within a predominantly commercial setting, potential issues of noise and air quality due to the location of units on High Holborn and the poor standard of housing that would be delivered as a result of constraints of the existing building, the building is considered to be unsuitable for conversion to residential use.

### **Preferred hotel use**

7.28 London Plan Policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.

- 7.29 In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the important of the visitor economy in Camden. It states that the Council will support tourism development and visitor accommodation. New, large-scale tourism development and visitor accommodation are expected in Central London.
- 7.30 Policy E3 states that all tourism 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.
- 7.31 With regard to (f), the site has a PTAL rating of 6b, which is the highest PTAL rating possible reflecting how easily it is reached by public transport. Nevertheless, a travel plan and associated monitoring and measures contribution would be secured through Section 106 legal agreement. In relation to (g), this is discussed within the Section 11 (Transport) below. Regarding (h), the character of the area is a mix of uses. The proposal includes sufficient mitigation measures in terms of amenity of those living nearby and this is discussed fully within Section 10 of the report. In relation to (i), there would be no loss of permanent residential accommodation as none is currently present on-site. It is therefore considered the proposal would accord with the wider aims and objectives of Policy E3 and would be a suitable location for a hotel use.
- 7.32 The proposed hotel will have a GIA of 3,133.9 sqm and provide 105 rooms. A hotel of this size would be acceptable in this location within the Central London Area. It would bring benefits to the area in terms of attracting footfall, supporting local businesses in the service sector, and maintaining a level of vibrancy. The proposed use would also bring new jobs to the area. An employment and training benefits package has also been secured (see Section 18 below). Condition 21 restricts the use of the site to a hotel to ensure that the rooms are not used as permanent self-contained housing and to protect the amenity of the area from other potential unsuitable uses.
- 7.33 Condition 19 requires the provision of 11 (10%) fully wheelchair-accessible rooms. This ensures that the internal layout of the building ensures sufficient provision for the needs of people with disabilities in accordance with the requirements of Policy D5 of the London Plan 2021 and Policy C6 of the

London Borough of Camden Local Plan 2017 and taking account of the Public Sector Equality Duty.

7.34 The applicant has submitted a hotel management plan which sets out protocols for transport, guest management, servicing and security.

7.35 Overall, the provision of hotel use at the site is acceptable and an assessment of the more specific aspects of the hotel's operation are outlined further in the report.

## **8. DESIGN AND HERITAGE**

### ***Legislative background and statutory framework***

8.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that where the development is in a conservation area, special regard must be given to preserving or enhancing the character and appearance of that conservation area.

8.2 The legislative framework creates a strong presumption in favour of preserving the character and appearance of conservation areas. Where proposals result in harm, such harm must be justified by public benefits that are sufficiently compelling to outweigh this presumption. The National Planning Policy Framework (NPPF), in particular Chapter 16, provides guidance on assessing harm to heritage assets and the weight to be afforded to such impacts.

8.3 The NPPF is a key material consideration. Chapter 16 ("Conserving and enhancing the historic environment") sets out the Government's approach to heritage protection. It requires local planning authorities to identify and assess the particular significance of any heritage asset affected by a proposal. It further directs how harm to designated heritage assets should be evaluated and weighed against any public benefits of the proposal (see NPPF Paragraphs 212–216). Paragraph 215 notes:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

8.4 Paragraph 216 notes:

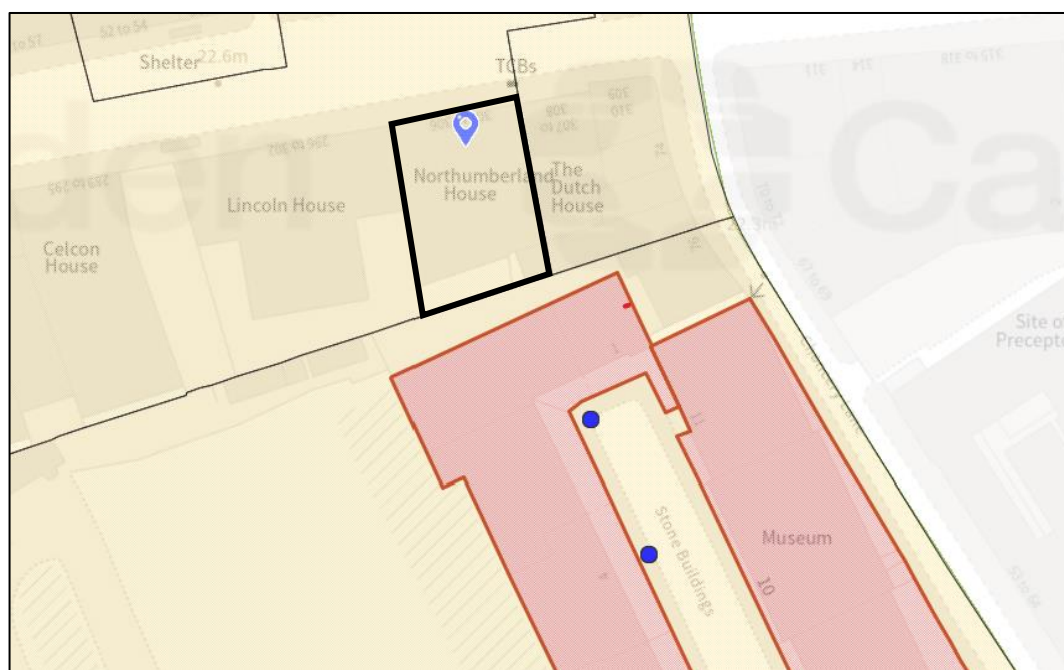
*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

### ***Policy review***

- 8.5 The London Plan (2021) includes policy D1, which emphasises the importance of understanding London’s form, character and capacity for growth. It advocated for area assessments to define the characteristics and qualities of different places, ensuring that development responds appropriately to local context. Policy D4 focuses on delivering good design, requiring developments to be of the highest quality, respect local context, and be inclusive and accessible.
- 8.6 The Camden Local Plan (2017) includes policy D1 (Design), which seeks high-quality design that responds to context and local character and policy D2 (Heritage) which aims to preserve and enhance heritage assets and their setting.

### ***Designations***

- 8.7 The site itself is neither locally nor statutorily listed, however it is located within the Bloomsbury Conservation Area. There are also a Grade I listed buildings directly to the rear of the site at 1-11Lincoln’s Inn. Figure 7 below shows the boundary of the conservation area (in beige) and the Grade I listed buildings (in red).



*Figure 7: Map showing the site in relation to the nearby heritage assets*

### ***Assessment of proposals***

- 8.8 There is no heritage reason to resist the change of use of this building from office and retail to hotel.
- 8.9 The proposal does not result in any changes to the overall form and massing of the building with the exception of the lift overrun. PV’s and a blue / green

roof are also proposed at roof level, as shown through Figures 10 and 11 below. Given the height of the building and location of these additions at roof level, they would have limited visibility from the public realm and do not raise any design or heritage related concerns.

8.10 As demonstrated through Figures 8 & 9 below, minor changes are proposed to the existing ground floor frontage which has limited architectural or heritage value. These changes have sought to activate the High Holborn street frontage through glazed areas for improved visibility and step-free access to improve inclusivity. This is welcomed given planning policies seek to improve accessibility and taking account of the Public Sector Equality Duty. The approval would be subject to Condition 4 b) which requires the submission and approval of materials and detailed drawings in relation to the ground floor frontage prior to the commencement of works to ensure they are of a suitable high standard. The proposed changes to the ground floor frontage are considered an improvement to the existing situation.

8.11 The replacement windows would retain the size and design of the existing windows, including the incorporation of glazing bars. As per above, Condition 4 a) and c) also requires the submission and approval of materials and detailed drawings for the windows and doors prior to the commencement of works to ensure they are of a suitable high standard.



Figure 8: Existing front elevation

Figure 9: Proposed front elevation

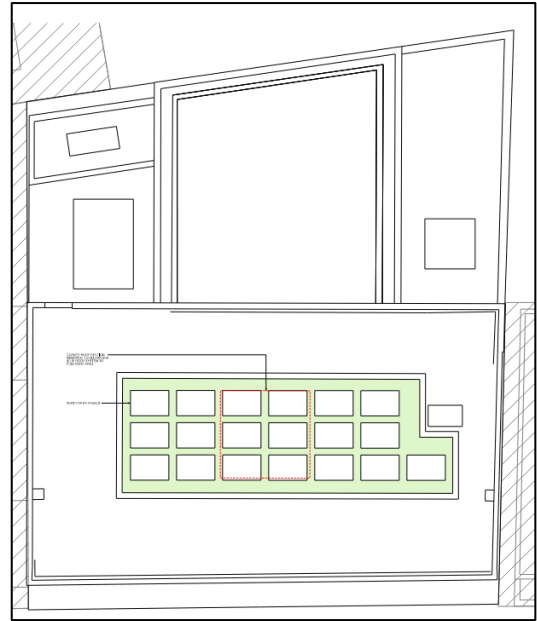
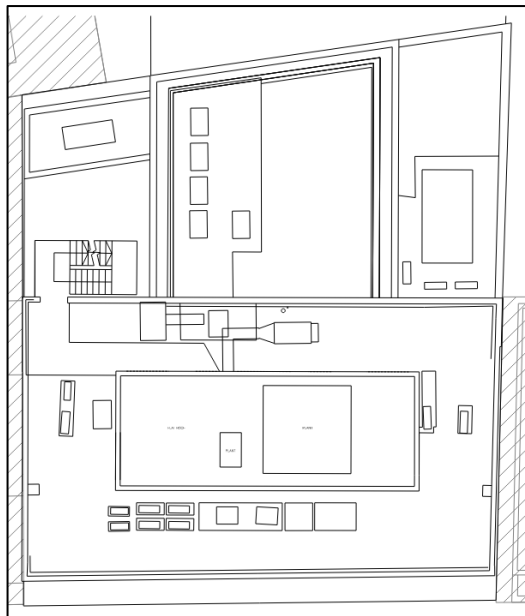


Figure 10: Existing level 10 (roof)

Figure 11: Proposed level 10 (roof)

- 8.12 An acoustic enclosure (and associated flue) for the emergency generator is proposed to the rear at lower ground floor level. Conditions 12 a) & c) require detailed drawings showing the size, exact location and enclosure design prior to the commencement of works to ensure that it is of a suitable high standard.
- 8.13 Overall, the scope of external changes is considered relatively minor and are required in association with the change of use of the building from Class E to Class C1. Overall, the proposal would preserve the character and appearance of the Bloomsbury Conservation Area. In summary, the proposals are considered acceptable, and in compliance with policies D1 and D2 of the Local Plan.

## 9. STANDARD OF ACCOMMODATION

- 9.1 An important objective of the NPPF (Paragraph 130), the London Plan and the Local Plan (Policy A1) is to seek to secure a good standard of amenity for all future occupants of buildings.
- 9.2 There is no specific planning policy or guidance that sets out standard of amenity for hotel accommodation. Local Plan policy A1 only refers to development being to the comfort of the short stay occupants.
- 9.3 Room layouts have been provided, and they are considered suitable for short term use by visitors.
- 9.4 A proportion of the hotel rooms are windowless as the building is constrained by existing floorplates. This provides a range of hotel rooms to users. Visitors to London have a wide choice of hotel accommodation of varying prices.

Some people would choose to not sleep in a room without a window, however others actively choose windowless rooms for reasons including affordability and improved darkness for sleeping.

- 9.5 The standard of accommodation in terms of guest comfort and facilities is therefore considered to be addressed.

## **10. IMPACT ON NEIGHBOURING AMENITY**

- 10.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

- 10.2 Given the nature of proposed works, which do not involve any extensions (with the exception of the lift overrun) and the fact no additional window openings are proposed, the proposal would not reduce the level of daylight, sunlight or outlook to surrounding properties nor would it increase the degree of overlooking. It is noted that there is no residential accommodation within the adjoining buildings.

- 10.3 An acoustic enclosure is proposed to the rear. Given its location at lower ground floor level and distance from surrounding buildings and windows it would also not reduce the level of daylight, sunlight, outlook or privacy to surrounding properties.

- 10.4 A hotel management plan has been submitted with the application which details how the site will be managed and operated so as to ensure there are no harmful impacts on neighbouring residents or their amenity.

### ***Noise and vibration***

- 10.5 A "Preliminary Plant Noise Assessment" has been submitted by the applicant as part of the application submission. The proposed development includes the installation of air source heat pumps, a standby generator, air handling units, hot water cylinders and variable refrigerant flow condensers.

- 10.6 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 "Methods for rating and assessing industrial and commercial sound".

- 10.7 The plant noise criteria have been adequately predicted, taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 10.8 The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria when assessed to human response to change in noise level at the nearest and potentially most affected noise sensitive receptors.
- 10.9 A Noise Officer has been consulted and is satisfied that the submitted acoustic submission meets the Council's local plan guidelines and therefore acceptable in environmental health terms, subject to conditions.
- 10.10 Conditions 7-11 have been included which relate to external noise levels, anti-vibration isolators and fan motors, noise level of emergency plant and generators, operation of emergency plant and generators and testing of emergency plant and generators.
- 10.11 It is considered that these conditions would ensure the amenity of neighbouring residential is protected in terms of noise and vibration from the proposed rooftop plant and emergency generator at rear lower ground floor level.

## **11. TRANSPORT**

### ***Policy review***

- 11.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 11.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movements of goods and materials by road.
- 11.3 Strategic priorities include:
- Increasing walking and cycling;
  - Improving public transport in the Borough;
  - Reducing car ownership and use;
  - Improving the quality of our air; and
  - Making our streets and transport networks safe, accessible and inclusive for all.
- 11.4 In November 2024, Camden Council's Cabinet agreed to implement the next phase of Camden's Transport Strategy (CTS) for 2025 to 2028, investing in

more environmentally friendly, healthier forms of travel and creating more welcoming streets and neighbourhoods. The strategy includes commitments which are also pertinent to this application, as follows:

- implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists by significant road safety improvements via the Holborn Liveable Neighbourhoods scheme, including improvements to cycling environment on High Holborn, Kingsway, and in Lincoln Inn Fields;
- deliver Better Bus Partnership which focuses on improving bus journey times and bus passenger experience by implementing upgrades to bus stop/shelter, including Countdown provision, better bus passenger information, and enhanced interchange via Healthy Streets measures to connect bus passengers to/from other public and shared transport services in local areas;
- provide Green Micromobility hubs across the Borough;
- develop a comprehensive network of electric vehicle charging points (EVCPs) that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future, in line with the [Electric Vehicle Charging Point Action Plan](#).
- continue to expand the dockless bike and e-scooter hire network; and
- contribute towards the implementation of the CTS Cycling Action Plan and Walking and Accessibility Action Plan.

***Site location and access to public transport***

- 11.5 The site is located on High Holborn which forms part of the Strategic Road Network (SRN). Camden Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- 11.6 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).
- 11.7 The closest London Underground stations to the site are Chancery Lane and Holborn, located approximately 200m east and 400m west of the site, respectively. The closest bus stop is located outside the premises.
- 11.8 The site is easily accessible from the Strategic Cycle Network with Cycleway C41 to the east on Red Lion Street, approximately 150m west from the site, providing access to King's Cross and St Pancras stations.
- 11.9 The nearest Santander cycle hire docking station is located on Red Lion Street with a further docking station located at Holborn Circus to the east of the site.

- 11.10 The nearest dedicated parking bay for dockless rental e-bikes and rental e-scooters is located on Red Lion Street and High Holborn, approximately 190m and 200m north-west and east of the site. However, these bays are already showing signs of overcapacity and increasing demand.
- 11.11 Camden's Transport Strategy team has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades between 2 and 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is the council's aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

### ***Trip generation***

- 11.12 The anticipated multi-modal person trips generated by the proposed hotel was calculated using trip rates obtained from TRICS. The analysis shows a trip rate of 4.577 per bedroom.
- 11.13 Figures 12-15 below provide a comparison between existing trip generation of the site in office use and trip generation associated with the proposed hotel. As shown, the proposal would result in an approximately 210 additional trips per day when compared to office use.
- 11.14 The proposed hotel would also generate a significantly different pattern of pedestrian activity throughout the day and evening, compared to office use. Hotel guests, employees, and visitors will create pressure on pavements, crossings, and cycle facilities at times when office trips are normally low, particularly in the evenings and on weekends along busy streets in the Holborn area.
- 11.15 Based on other developments in the area, it is anticipated that a high volume of the walking trips are likely to be made from Chancery Lane and Holborn London Underground Stations, bus stops on High Holborn (A4), and commercial, entertainment, shopping and restaurant venues in Holborn.
- 11.16 Given the likely increase in active travel to and from the site, the applicant will be requested to provide a financial contribution towards the HLN project.

Period	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Trip Rate (per 100sqm)	1.908	0.022	1.93	0.022	2.018	2.04	5.966	5.855	11.821
Total Person Trips	44	1	44	1	46	47	137	134	271

Figure 12: Existing office trip generation (Source: Submitted Transport Assessment, Table 6.1)

Mode	AM Peak (08:00 - 09:00)			PM Peak (17:00 - 18:00)			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground	18	0	18	0	18	19	55	54	108
Rail	16	0	16	0	17	17	50	49	99
Bus	5	0	5	0	6	6	17	17	33
Car / motorbike	0	0	0	0	0	0	0	0	0
Bicycle	3	0	3	0	3	3	8	8	16
Walk	2	0	2	0	2	2	7	7	14
<b>Total</b>	<b>44</b>	<b>1</b>	<b>44</b>	<b>1</b>	<b>46</b>	<b>47</b>	<b>137</b>	<b>134</b>	<b>271</b>

Figure 13: Existing multi-modal trip generation (Source: Submitted Transport Assessment, Table 6.3)

Period	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Trip Rate (per bedroom)	0.123	0.32	0.443	0.185	0.107	0.292	2.221	2.356	4.577
Total Person Trips	13	34	47	19	11	31	233	247	481

Figure 14: Proposed total trip generation (Source: Transport Assessment, Table 6.2)

Mode	AM Peak (08:00 - 09:00)			PM Peak (17:00 - 18:00)			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground	5	14	19	8	4	12	93	99	192
Rail	5	12	17	7	4	11	85	91	176
Bus	2	4	6	2	1	4	29	31	59
Car / motorbike	0	0	0	0	0	0	0	0	0
Bicycle	1	2	3	1	1	2	14	15	28
Walk	1	2	2	1	1	2	12	13	25
<b>Total</b>	<b>13</b>	<b>34</b>	<b>47</b>	<b>19</b>	<b>11</b>	<b>31</b>	<b>233</b>	<b>247</b>	<b>481</b>

Figure 15: Proposed multi-modal trip generation (Source: Transport Assessment, Table 6.5)

### Travel planning

11.17 An Outline Travel Plan was submitted in support of the planning application this is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections

for walking and cycling will need to be set in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

- 11.18 A Travel Plan covering an associated monitoring and measures contribution of £11,348 will be secured by Section 106 legal agreement.

***Access and permeability***

- 11.19 Pedestrian access is provided in the location of the existing main entrance on High Holborn, with two secondary entrances proposed either side for staff and emergencies. All fire escapes/ doors that open out onto High Holborn are recessed into the building to avoid doors opening directly onto the public footway. Cyclists will use the eastern pedestrian entrance, which offers a route to the cycle store and avoids the main entrance. There is no motor vehicle access to the site.

***Cycle parking***

- 11.20 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS) and London Plan Policy T5 for:

- 11.21 C1 use, Hotels

- 1 space per 20 bedrooms long-stay; and
- 1 space per 50 bedrooms short-stay.

- 11.22 10 long-stay spaces would be provided in the form of five two-tier cycle racks, accessed via a dedicated ground-floor store. This is in line with the London Plan standards and CPG Transport.

- 11.23 Two visitor spaces are also required. While the proposal results in the loss of the three existing short stay cycle spaces, two visitor spaces are to be provided on the public highway in a suitable location close to the site. A financial contribution of £300 would be secured by Section 106 legal agreement for the provision of one Sheffield stand.

- 11.24 Full cycle parking details will be secured by Condition 17.

***Car parking and vehicle access***

- 11.25 The site is in controlled parking zone CA-C (Single Yellow lines), which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday, with 24hrs Residents Bays.

- 11.26 The entire development would be secured as car-free by Section 106 legal agreement.

- 11.27 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '*...all non-residential elements*

*should provide access to at least one on or off-street disabled persons parking bay.’ Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: ‘All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.’*

- 11.28 Paragraph 5.19 of the Camden Planning Guidance on Transport states: ‘For all major developments the Council will expect that disabled car parking is accommodated on-site.’ Paragraph 5.20 further informs: ‘...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site’.
- 11.29 ‘National disability, accessibility and blue badge statistics: 2021 to 2022’ published on 18 January 2023, report that on 31 March 2022, 4.3% of the population held a Blue Badge, an increase of 3.6% since March 2021.
- 11.30 Based on the above, it is considered appropriate to secure an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m of the site.
- 11.31 While it is expected that most guests and staff would travel to the site by sustainable modes of transport, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an ‘Electric Vehicles Only’ parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Therefore, an additional electric vehicle charging point (fast charger) is to be provided on the public highway in the general vicinity of the site in the form of a £20,000 financial contribution to be secured through Section 106 legal agreement, in accordance with Policy A1 of the Camden Local Plan.

### **CPZ Review**

- 11.32 Objective 2 of the CTS sets out to reduce car ownership and use, and motor traffic levels in Camden, and features several measures in support of achieving this objective. One of the measures is 2d, which states that the Council will *‘undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use, and use that study to help guide future reviews and decisions.’*
- 11.33 In alignment with that action, Camden’s CPZ Review final report, which was published in February 2023, independently appraised all of Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment Results show that CA-C CPZ performed

poorly in terms of the impact of its current hours of control in helping manage demand, and was attributed a “Red” RAG status, which present the greatest need and/or justification for increasing the regulation parking. The review recommends, amongst others, that the CA-C hours of operation of single yellow lines and sessional P&D parking are extended subject to consultation and decision-making processes.

11.34 In 2024 progress on the CTS was reviewed and a delivery plan for the period covering 2025 - 2028 was agreed by Camden Council’s Cabinet. It committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels, and vehicle emissions in the Borough:

- Controlled Parking Zone (CPZ) hours extensions
- Workplace Parking Levy
- EVCP roll out.

11.35 At present, the CA-C CPZ control hours do not extend into the evening, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and location of the proposed development, it is appropriate for a contribution of £30,000 towards the CA-C CPZ review to be secured by Section 106 legal agreement. The next phase of which will include new signage, communications materials, traffic orders, and further consultation and decision in future financial years.

#### ***Coach parking and taxis***

11.36 There is concern over the possibility of the hotel attracting the arrival of coach parties (which may be outside the applicant’s control) causing delays and safety issue in close proximity to the hotel. We therefore require a planning obligation to be secured by legal agreement stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Camden Local Plan Policy E3 (paragraph 5.60).

11.37 Taxi pick-ups/drop-offs will continue on-street in line with the existing arrangements.

#### ***Construction management***

11.38 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process. A draft Construction Management Plan (CMP) using the Council’s CMP pro-forma was provided with the

application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.

- 11.39 The site is located on High Holborn (A40), which forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area.
- 11.40 A more detailed CMP document will be secured through Section 106 legal agreement, in accordance with Local Plan Policy A1.
- 11.41 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council.
- 11.42 The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 11.43 The development will require input from officers at construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during construction.
- 11.44 Implementation support contributions of £12,000 and impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1.

#### ***Deliveries and servicing***

- 11.45 A Delivery and Servicing Plan (DSP) was provided with the application. The proposed development is expected to generate demand for three delivery vehicles per day. Servicing and waste collection will take place on-street in front of the site, 19:00-07:00, outside loading and stopping restrictions. A more detailed DSP will be secured by legal agreement if planning permission is granted.

#### ***Highway works***

- 11.46 The financial contribution towards highways works is a standard request applicable to all major developments where construction works might result in damage to public highway. We will therefore be requesting a highways contribution of £20,000 to be secured through Section 106 legal agreement.

### ***Pedestrian, cycling, environmental improvements***

- 11.47 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments and changes of use place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on the Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.
- 11.48 In line with the increase in walking and cycle trips generated by the proposed development, being an increase in 210 trips/day, as outlined within Paragraph 11.13 above, and further promoted by the requested Travel Plan, we will secure a financial contribution of £52,000 by Section 106 legal agreement towards the HLN scheme, specifically for improvements to cycling, including cycling lanes, two-way cycling on one-way streets, and cycle parking in Lincoln Inn Fields, and Better Bus Partnership, especially the upgrade of the bus stops/shelters in the vicinity of the site.

### ***Micro and shared mobility improvements***

- 11.49 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.
- 11.50 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 11.51 A cycle/e-scooter hire improvements contribution of £10,000 is therefore to be secured by Section 106 legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

### ***Conclusion***

- 11.52 The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348;
- Car-free development;
- No coach party bookings, and a ban on customers being picked up or dropped off by coach at any time outside the hostel
- Off-site cycle parking contribution of £300;
- Off-site contribution of £4,000 for a disabled parking space;
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000;
- CA-C CPZ review contribution of £30,000;
- CMP implementation support contribution of £12,000 and CMP Impact Bond of £16,000;
- Delivery and Servicing Plan;
- Highway works contribution of £20,000;
- Pedestrian, Cycling and Environmental Improvements contribution of £52,000; and
- Micromobility improvements contribution of £10,000.

## **12. SUSTAINABILITY AND ENERGY**

12.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The current Camden Climate Action Plan 2026-2030 seeks to respond to the urgency of the climate crisis, enabling zero carbon and a climate resilient borough.

12.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

12.3 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM excellent.

### ***Energy and carbon reductions***

12.4 Whilst this proposal is not a major development, does not involve any uplift in floorspace nor any significant demolition or reconstruction of the building fabric it does propose a major upgrading of the building's thermal envelope including renewal of all windows and new insulation to the inside faces of the building's external walls. This has the effect of improving the building's energy performance in a comparable way to an equivalent sized major scheme without involving the same scale of rebuilding. The resulting improvements to energy performance are compared with the policy expectations that would be applied to a major scheme in the paragraphs below.

- 12.5 To minimise operational carbon, the London Plan (2021) seeks that developments follow the energy set out in Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 12.6 Local Plan Policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Energy and carbon summary

- 12.7 The following summary table shows how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	15%	38 %
Be green stage (renewables): CLP policy CC1	20%	10 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	44 %

*Table 1 - Carbon saving targets (for majors) and the scheme results*

- 12.8 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 12.9 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).

- 12.10 In this case, the development exceeds the policy target that would apply to a major development of 35% reductions, achieving an overall on-site reduction of 44% below Part L requirements as shown in Table 1 above.

Be lean stage (reduce energy demand)

- 12.11 London Plan policy SI 2 sets a policy target of at least a 15% reduction through reduced energy demand at the first stage of the energy hierarchy

- 12.12 In this case, the development exceeds the policy target of 15%, reducing emissions by 38% at this stage through energy efficient design, in

compliance with the development plan. The proposals involve high performance insulation, efficient glazing and lighting, MVHR and wastewater heat recovery.

- 12.13 Policy CC2 of the Local Plan discourages active cooling (air conditioning) and states that air conditioning will only be permitted where thermal modelling demonstrates a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy,
- 12.14 Active cooling is proposed and an overheating assessment has been submitted by the applicant as part of the justification for active cooling. The applicant states that the effect of internal blinds was tested during the dynamic thermal simulations and that this did not result in any rooms passing. However, there is no reference to internal blinds within the submitted overheating assessment, and we have been unable to locate this scenario. Internal blinds can reduce solar heat gains and lower operative temperatures within TM59 modelling. Even if internal blinds alone do not resolve overheating, the cooling hierarchy requires the use of a combination of feasible measures, and to maximise passive strategies. The applicant has not demonstrated that internal blinds are unfeasible, and therefore we would expect them to be incorporated within the design and included as a scenario within the dynamic thermal modelling (DTM).
- 12.15 As the overheating assessment has not sufficiently addressed the cooling hierarchy, Condition 15 requires an overheating assessment incorporating dynamic thermal modelling to be submitted and states that no mechanical cooling equipment shall be installed unless the DTM identifies a residual risk of overheating after all feasible measures from the cooling hierarchy have been applied.

Be clean stage (decentralised energy supply)

- 12.16 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires 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.
- 12.17 At present, there is no local District Heating Network (DHN) for the site. The nearest DHN connection is approximately 650m away. A connection to this DHN would not be viable as it would require Citigen to confirm they would extend their network, installing pipework would have high costs and it would take some time. In addition, the proposed VRF for heating and cooling of the hotel is incompatible with a DHN connection and would require a major refurbishment to integrate, including extensive structural works and would compromise floor-to-ceiling heights. The plant room that would be required

to future proof would remove 3 hotel rooms, impacting the viability of the scheme

- 12.18 In this case, the justification of not future proofing the development for future district heat network systems is considered acceptable. Mainly, due to the development having a retrofit approach, structural and floor to ceiling constraints.

Be green stage (renewables)

- 12.19 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

- 12.20 In this case, the development fails to meet the policy target of 20%, reducing emissions by 10% at this stage through renewables. However, the proposal includes PV panels on the roof, low carbon heating like ASHP, blue / green roofs and permeable paving which is welcomed. Full details of these will be secured through Conditions 5, 6, 14 and 22.

Be seen (energy monitoring)

- 12.21 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting to the GLA in line with their published guidance, which is welcomed, and which is to be secured by the Section 106 legal agreement.

***Climate change adaption and sustainable design***

- 12.22 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

- 12.23 Local Plan Policy CC2 point (h) expects all non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments. A Preliminary BREEAM Assessment has been carried out, showing that all the main targets are met and exceed per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an ‘Excellent’ rating). The proposal reviewed currently achieves a score of 75%, which equates to an ‘Excellent’ rating. The Pre-Assessment reports shows that:

- Energy – 70% with the target being 60%
- Water – 78%, with the target being 60%

- Materials - 84%, with the target being 40%.

- 12.24 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.
- 12.25 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 12.26 The proposal incorporates water-efficient design measures to minimise on-site water consumption. Condition 20 would secure the water usage target of 105 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.
- 12.27 The proposal provides green roofs and details of the substrate depth, species and maintenance are secured by Condition 5 to ensure their sustainability and biodiversity contribution.
- 12.28 Overheating is to be mitigated through the inclusion of Condition 15, as detailed within paragraph 12.15 above.
- 12.29 In this case, the development incorporates SUDS and the provision of a green / blue roof integrated with solar panels and permeable paving in the rear courtyard which would enhance biodiversity of the site and reduce water runoff. Condition 14 requires further details of these to be submitted for approval.
- 12.30 Flood risk is covered in the 'Flood risk and drainage' section of this report.

### **13. AIR QUALITY**

- 13.1 The Camden Local Plan policy CC4 is relevant with regards to air quality.
- 13.2 An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by an Air Quality Officer.
- 13.3 The AQA stated:
- The development was considered to be low risk for dust soiling and human health impacts;
  - The development will be car free, therefore the impact of the development is negligible and not significant;
  - The development was considered to be air quality neutral in relation to both building and transport emissions;
  - Pollutant concentrations at the site will be below the relevant air quality objectives and the site is suitable for its proposed end use; and

- The impact of the proposed development during both the construction and operational phases is not significant.

13.4 Air quality during construction would be managed in the CMP, which is secured by section 106.

13.5 A generator and associated flue, for life safety operation is proposed in the rear lower ground floor courtyard. Full details of these have not been provided but have been secured through condition 12.

13.6 In consultation with the Council's Air Quality Officer, the proposals are considered acceptable in terms of air quality subject to conditions.

#### **14. TREES, GREENING, AND BIODIVERSITY**

##### ***Impact on trees, greening and biodiversity***

14.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.4 for mainly residential schemes, and 0.3 for mainly commercial schemes.

14.2 The proposal is for a change of use with a retrofit approach and no extensions. It does not result in the removal of any trees or vegetation. Given the constraints posed by the site, opportunities for greening are limited, however a blue / green roof has been incorporated. The inclusion of trees or planting is not feasible in this instance.

##### ***Statutory Biodiversity Net Gain***

14.3 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

14.4 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.

14.5 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an onsite priority habitat and impacts less than 25 square metres of

onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat.

## **15. WATER AND FLOODING**

- 15.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SuDs) and water efficiency measures.
- 15.2 A Flood Risk Assessment and Drainage Strategy have been submitted as part of this application. SuDs biodiverse roofs and permeable paving are proposed in order to manage the water environmental on and around the site.
- 15.3 The site is not in a local flood risk zone, or on a previously flooded street, however there is risk of surface water flooding in the vicinity of the building, which increases with climate change and hotel rooms are proposed at ground and basement levels.
- 15.4 It is not anticipated that there will be any increase in surface water flooding from the site as the building's exterior is to remain as it. The proposed runoff rate has a betterment of 16.7%.
- 15.5 Condition 14 requires the applicant to submit further SUDS details in relation to the proposed permeable paving and blue/green roof. This condition will ensure that surface-water flood risk and drainage impacts are successfully managed/mitigated. Notwithstanding this, as detailed above, it is noted that the proposed development is for a change of use.
- 15.6 In consultation with the Lead Local Flood Authority, the development will have an acceptable impact on flooding in the area.
- 15.7 The Lead Local Flood Authority is happy with the proposals subject to condition 14 on SuDs. Given the above, the proposed measures are considered acceptable in terms of flood risk.

## **16. ACCESSIBILITY**

- 16.1 Policy C6 of the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities by expecting 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.
- 16.2 The existing building will ensure users benefit from step-free access at all building entrances. The scheme also includes an accessible lift and an accessible WC within the restaurant area. The proposed development would

meet the standards of accessible and inclusive design as required by Policy C6 of the Local Plan and therefore would accord with the development plan in this regard.

- 16.3 Condition 19 requires the provision of 10% (11) fully wheelchair-accessible rooms. This ensures that the internal layout of the building ensures sufficient provision for the needs of people with disabilities in accordance with the requirements of Policy D5 of the London Plan 2021 and Policy C6 of the Local Plan and is welcomed when taking account of the Public Sector Equality Duty.

## **17. FIRE SAFETY**

- 17.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 17.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The Fire Safety London Plan Guidance accompanies the London Plan policy. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 through its use of fire safety professionals and that the planning officer must ensure the information has been provided. The review of the fire safety measures and their compliance with building regulations and standards will still take place at the Building Control stage. It shall not be undertaken by planning officers.
- 17.3 The application is accompanied by a "London Plan Fire Statement" document which has been prepared by Jensen Hughes, a firm of qualified fire engineers. It provides information on; evacuation strategy, fire safety systems, means of escape, internal and external fire spread and firefighting provisions.
- 17.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5.

## **18. EMPLOYMENT AND TRAINING OPPORTUNITIES**

- 18.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is for more than 1,000sqm and £3million construction costs. To ensure local people benefit from these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.
- 18.2 Sections 54-60 of the CPG (Employment Sites and Business Premises) expect a financial contribution where there is a loss of employment space/office over 500 sqm. The number of full-time (FT) jobs created through the hotel use would be less than the existing use, therefore this should be compensated for. The contribution is based on the difference between the number of jobs expected to be supported if a building remained as its existing employment-generating use and the number of jobs expected to be generated by the hotel use.
- 18.3 As per Paragraph 7.22 above, the contribution amount would be £151,810.00 for the loss of employment space which will be secured by Section 106 legal agreement.
- 18.4 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term, outlined as follows.

### ***During construction***

- Apprenticeships - The applicant should recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs and pay the Council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. The applicant has stated that the build costs are estimated to be around £14 million, which equates to 5 construction apprenticeships and a contribution of £8,500. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre. If these apprenticeships are not delivered, a default payment will be required (as per section 65 of the CPG).
- Construction Work Experience Placements - The applicant should provide 2 construction work placement opportunities of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the council's Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG and shall be paid London living wage. If these placements are not delivered, a default payment will be required (as per section 69 of the CPG).
- Local Recruitment - The applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than 14 days before the roles are advertised more widely.

- Local Procurement - The applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

### ***Post construction***

- 18.5 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments which will result in a net increase of 1,000sq m (GIA) or more of employment space including office, hotel and leisure developments.
- 18.6 The applicant has agreed to the following end use/occupation phase opportunities:
- Apprenticeships – 1 end use apprenticeship. The employment Apprenticeships will be recruited via Camden's Inclusive Economy Service (Future Talent Team).
  - Work experience opportunities – The applicant should provide 2 work experience opportunities of not less than 2 weeks for the occupation phase of the development, paid London living wage. The applicant should liaise with Camden's Inclusive Economy Service (Future Talent Team) on this.
- 18.7 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining Camden's Inclusive Business Network
  - Working with Good Work Camden//the Council's Inclusive Economy Service to recruit to vacancies locally.
  - Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.
- 18.8 The above measures would be included in a package of Employment and Training measures secured by Section 106 legal agreement in accordance with CLP policy E1 and the CPG.
- 19. REFUSE AND RECYCLING**
- 19.1 Policy CC3 (Waste) states that the Council will seek to make Camden a low-waste borough. Part (d) of the policy states that we will ensure that developments include facilities for storing and collecting waste and recycling.

- 19.2 A refuse storage area is proposed at ground floor level. The fire-fighting lift is double sided so that bins can be taken through it and out the side entrance as opposed to through the lounge or main entrance door.
- 19.3 There will be an estimated 5-7 refuse collections a week and step-free access is provided to the refuse area.
- 19.4 Condition 23 requires the refuse storage area to be provided before the commencement of the use hereby permitted and retained for the duration of the development and a detailed delivery and servicing plan would be secured by Section 106 legal agreement.

## **20. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 20.1 The CIL applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 20.2 No new floorspace is proposed, therefore the scheme will not be CIL liable.

## **21. CONCLUSION**

- 21.1 The proposed hotel with ancillary facilities, is considered acceptable and aligns with both the London Plan and Camden Local Plan policies supporting visitor infrastructure and development supporting the local economy.
- 21.2 This application meets the policy tests of Policy E2 of the Local Plan, which seeks to protect existing employment space within the borough. The two-plus years of marketing evidence has demonstrated a lack of demand, and the constraints posed by the existing building and quality of the existing office space contribute to this lack of interest.
- 21.3 Retail (Class E) space is lost at ground floor level, however these units are currently vacant and there is a lack of demand for their continued use. The proposal would provide continued activation at ground level through the publicly accessible restaurant/bar at ground floor level which would increase footfall and economic activity.
- 21.4 The provision of residential on-site is not appropriate in this instance given the site's location and concerns surrounding standard of accommodation.
- 21.5 The London Plan and Local Plan support the delivery of visitor infrastructure within the CAZ, which is near many destinations and attractions.
- 21.6 The proposed high-quality and sustainable hotel will bring a partially vacant building back into use and will optimise the building's environmental

performance, with a BREEAM 'excellent' building, energy efficient, air quality neutral and resilient to climate change.

- 21.7 The development would not result in undue harm to neighbouring amenity, the local transport network, or infrastructure subject to the recommended conditions and Section 106 obligations.
- 21.8 Accessibility and inclusive design standard have been met, with 10% of hotel rooms designed to be wheelchair accessible.
- 21.9 The scheme includes significant contributions including for transport and highways, loss of employment space and an employment and training package.
- 21.10 In conclusion, the proposed development is considered to comply with the development plan as a whole, delivers substantial public benefits, and represents a sustainable and appropriate use of a highly accessible site. It is therefore recommended that planning permission be granted.

## **22. RECOMMENDATION**

- 22.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

### Energy and sustainability

- Energy plan securing: 44% CO2 reduction, 38 be lean stage of 38% and be green stage of 10%
- Sustainability plan (BREEAM compliance) – Secure BREEAM excellent rating (70% for energy, 84% for materials and 78% for water)

### Transport

- Car-free development
- Travel plan covering an associated monitoring and measures contribution of £11,348
- Contribution of £300 towards the provision of one Sheffield stand on the public highway in a suitable location close to the site for visitor cycle parking
- Off-site contribution of £4,000 towards a disabled parking space to be provided on the public highway in a suitable location 50m from the site
- Electric vehicle charging point contribution of £20,000
- CA-C CPA review contribution of £30,000
- CMP and associated implementation support contribution of £12,000 and impact bond of £16,000
- Highways contribution of £20,000
- Cycle/e-scooter hire improvements contribution of £10,000

- Pedestrian cycling and environmental improvements contribution of £52,000 towards the Holborn Liveable Neighbourhood scheme
- No coach party bookings and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel
- Delivery and servicing management plan

#### Employment and training

- Loss of employment space contribution of £151,810.00.
- 5 construction apprenticeships and a support contribution of £8,500.
- 2 construction work placements of not less than 2 weeks
- Local recruitment (20% target)
- Local procurement
- 1 end use apprenticeship on a rolling term for 5 years.
- 2 work experience opportunities of not less than 2 weeks for the occupation phase of the development
- Joining Camden's Inclusive Business Network
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.

#### Other

- Public access plan

### **23. LEGAL COMMENTS**

- 23.1 Members are referred to the note from the Legal Division at the start of the Agenda.

**24. CONDITIONS**

1	<p><b>Three years from the date of this permission</b></p> <p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p><b>Approved drawings</b></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>1543_001 Location Plan</p> <p>Existing Drawings:</p> <p>1543_009 Existing Level -1 (Lower Ground); 1543_010 Existing Level 0 (Ground); 1543_011 Existing Level 1; 1543_012 Existing Level 2; 1543_013 Existing Level 3; 1543_014 Existing Level 4; 1543_015 Existing Level 5; 1543_016 Existing Level 6; 1543_017 Existing Level 7; 1543_018 Existing Level 8; 1543_019 Existing Level 9 (Plant); 1543_020 Existing Level 10 (Roof); 1543_025 Existing Elevations 1; 1543_026 Existing Elevations 2; 1543_027 Existing Sections.</p> <p>Proposed Drawings:</p> <p>1543_109, Revision A, Proposed Level -1 (Lower Ground); 1543_110, Revision A, Proposed Level 0 (Ground); 1543_111, Revision A, Proposed Level 1; 1543_112, Revision A, Proposed Level 2; 1543_113, Revision A, Proposed Level 3; 1543_114, Revision A, Proposed Level 4; 1543_115, Revision A, Proposed Level 5; 1543_116, Revision A, Proposed Level 6; 1543_117, Revision A, Proposed Level 7; 1543_118, Revision A, Proposed Level 8; 1543_119, Revision A, Proposed Level 9 (Plant); 1543_120, Revision C, Proposed Level 10 (Roof); 1543_125, Revision B, Proposed Elevations 1; 1543_126, Revision A, Proposed Elevations 2 ; 1543_127, Revision A, Proposed Sections.</p> <p>Supporting documents:</p> <p>Cover Letter prepared by Savills, 18 December 2025; Design and Access Statement prepared by the Manser Practice, December 2025; Planning Statement Prepared by Savills, December 2025; Hotel Management Plan, December 2025 ; Preliminary Plant Noise Assessment prepared by Ramboll, 2025/12/165; Marketing Report prepared by HK London, 15th December 2025; Transport Assessment prepared by Curtins, 17 December 2025; Outline Travel Plan prepared by Curtins, 17 December 2025; Outline Delivery &amp; Servicing Management Plan prepared by Curtins, 17 December 2025;</p>

	<p>Statement of Community Involvement prepared by Concilio, December 2025; Air Quality Assessment prepared by Socotec; Construction/ Demolition Management Plan Pro-Forma; Energy Assessment Prepared by Eight Versa, 17/12/2025; London Plan Fire Statement prepared by Jensen Hughes; Overheating Analysis prepared by Eight Versa, 16/02/2026; Preliminary BREEAM Assessment prepared by Eight Versa, 30/01/2025; BREEAM 2014 Refurbishment and Fit Out Score; Contractor's Requirements prepared by Eight Versa, 30/01/2025; Flood Risk Assessment and Drainage Strategy prepared by Curtins, 28 January 2026.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p><b>Materials to match existing</b></p> <p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p><b>Design details</b></p> <p>Before the relevant part of the works is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Detailed drawings of all windows and doors including sections at 1:10</li> <li>b) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the ground floor frontage at a scale of 1:10</li> </ul> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the buildings and the character and appearance of the area in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
5	<p><b>Green roof details</b></p> <p>Prior to commencement of development, full details in respect of the living roof in the areas indicated on the approved plans shall be submitted to and approved in writing by the local planning authority. The details shall include:</p> <ul style="list-style-type: none"> <li>i. a detailed scheme of maintenance</li> <li>ii. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials use</li> <li>iii. full details of planting species and density</li> </ul>

	<p>The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2, and A3 of the London Borough of Camden Local Plan 2017.</p>
6	<p><b>Air Source Heat Pump and/or Air Condensers (Non-residential)</b></p> <p>Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more), SEER of at least 5.1, adoption of the lowest feasible global warming potential refrigerant for the development and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies. Also to ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.</p>
7	<p><b>External Noise Levels</b></p> <p>The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>

8	<p><b>Anti-Vibration Isolators and Fan Motors</b></p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
9	<p><b>Noise Levels of Emergency Plant and Generators</b></p> <p>Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10 dB one metre outside any premises.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
10	<p><b>Operation of Emergency Plant and Generators</b></p> <p>The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.</p> <p>Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
11	<p><b>Testing of Emergency Plant and Generators</b></p> <p>Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
12	<p><b>Diesel or oil back up generators</b></p>

	<p>Prior to the commencement of development, full details of the proposed Emergency Diesel/Oil Generator Plant and any associated abatement technologies including make, model, emission details shall have been submitted to and approved by the Local Planning Authority in writing. The submitted details shall include:</p> <ul style="list-style-type: none"> <li>a) Detailed drawings showing the size, exact location and enclosure design of the generator.</li> <li>b) Confirmation that generators are appropriately sized for life-saving and essential safety functions only, and that alternatives to diesel have been fully considered.</li> <li>c) Details of the generator flue/exhaust, including its height, and plan and elevation drawings showing its location in relation to all nearby air inlets, openable windows and any areas where occupants, neighbours or members of the public could be exposed to emissions. These details must demonstrate that the flue is positioned and designed at high level, and located away from such openings, so that emissions do not enter buildings or ventilation systems and recirculation is avoided.</li> </ul> <p>The development shall thereafter be carried out and maintained strictly in accordance with the approved details.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1, D1, D2 and CC4 of the London Borough of Camden Local Plan 2017.</p>
13	<p><b>Maintenance of backup generators</b></p> <p>The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017</p>
14	<p><b>SUDS</b></p> <p>Prior to first occupation of the hotel rooms hereby approved, the following shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Evidence that the sustainable drainage system, including blue roof and permeable paving has been implemented in accordance with the approved details. <i>This should</i> include permeable paving with 7m<sup>3</sup> water storage and blue/green roof with a minimum 4.6m<sup>3</sup> water storage</li> <li>b) A lifetime maintenance plan in relation to the sustainable drainage system.</li> </ul> <p>The systems shall thereafter be retained and maintained in accordance with the approved details and maintenance plan.</p>

	<p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
15	<p><b>Active Cooling (such as air conditioning):</b></p> <p>Prior to the commencement of development, excluding site clearance and preparation works, an Overheating Assessment incorporating Dynamic Thermal Modelling (DTM) shall be submitted to and approved in writing by the Local Planning Authority. No mechanical cooling equipment shall be installed unless the DTM identifies a residual risk of overheating after all feasible measures from the cooling hierarchy have been applied.</p> <p>Reason: To ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.</p>
16	<p><b>Mechanical Ventilation</b></p> <p>Prior to commencement of development, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with Policy CC4 of the London Borough of Camden Local Plan 2017 and London Plan policy SI 1.</p>
17	<p><b>Cycle parking details</b></p> <p>Prior to occupation of the hotel rooms hereby approved, details of cycle storage area for at least 10 long-stay cycle spaces at ground floor level shall be submitted to and approved in writing by the local planning authority.</p> <p>The approved facility shall thereafter be provided in its entirety prior to the first occupation of any of the new hotel bedrooms, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>

18	<p><b>Fire safety</b></p> <p>The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by Jensen Hughes dated 17/12/2025.</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.</p>
19	<p><b>Wheelchair accessible rooms</b></p> <p>Prior to the commencement of first use of the hotel, there shall be the provision of 11 (10%) fully wheelchair accessible rooms.</p> <p>Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.</p>
20	<p><b>Water efficiency</b></p> <p>The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
21	<p><b>Premises to only be used as a hotel</b></p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall not be used other than as a hotel within a single planning unit.</p> <p>Reason: In order to ensure that the site is not used as permanent residential accommodation and to protect the amenities of the surrounding area in accordance with policies A1, A4, H6, and D1 of the London Borough of Camden Local Plan 2017.</p>
22	<p><b>Solar PV – Evidence of Installation</b></p> <p>Prior to first occupation of any of the hotel rooms hereby approved, evidence showing the location, extent (40 panels /at least 101.2m<sup>2</sup>) and predicted energy generation of photovoltaic cells (at least 19,764kwh/annum) / energy generation capacity (at least 600W per panel) and associated equipment installed on the building in accordance with the approved details as part of the development as well as details of the maintenance programme shall be submitted to the Local Planning Authority and approved in writing.</p>

	<p>The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
23	<p><b>Waste and recycling storage to be implemented</b></p> <p>The refuse storage area shown on approved plan 1543_110, Revision A shall be provided prior to the commencement of the use hereby permitted, and shall thereafter be retained for the duration of the development.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the site and building in accordance with policies CC5, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>

## 25. INFORMATIVES

1	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p>

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements. Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).

4

Biodiversity Net Gain (BNG) Informative (2/3):

+ Summary of transitional arrangements and exemptions for biodiversity gain condition

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.
2. The planning permission is retrospective.
3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
4. The permission is exempt because of one or more of the reasons below:
  - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
  - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
  - The application is a Householder Application.
  - It is for development of a "Biodiversity Gain Site".

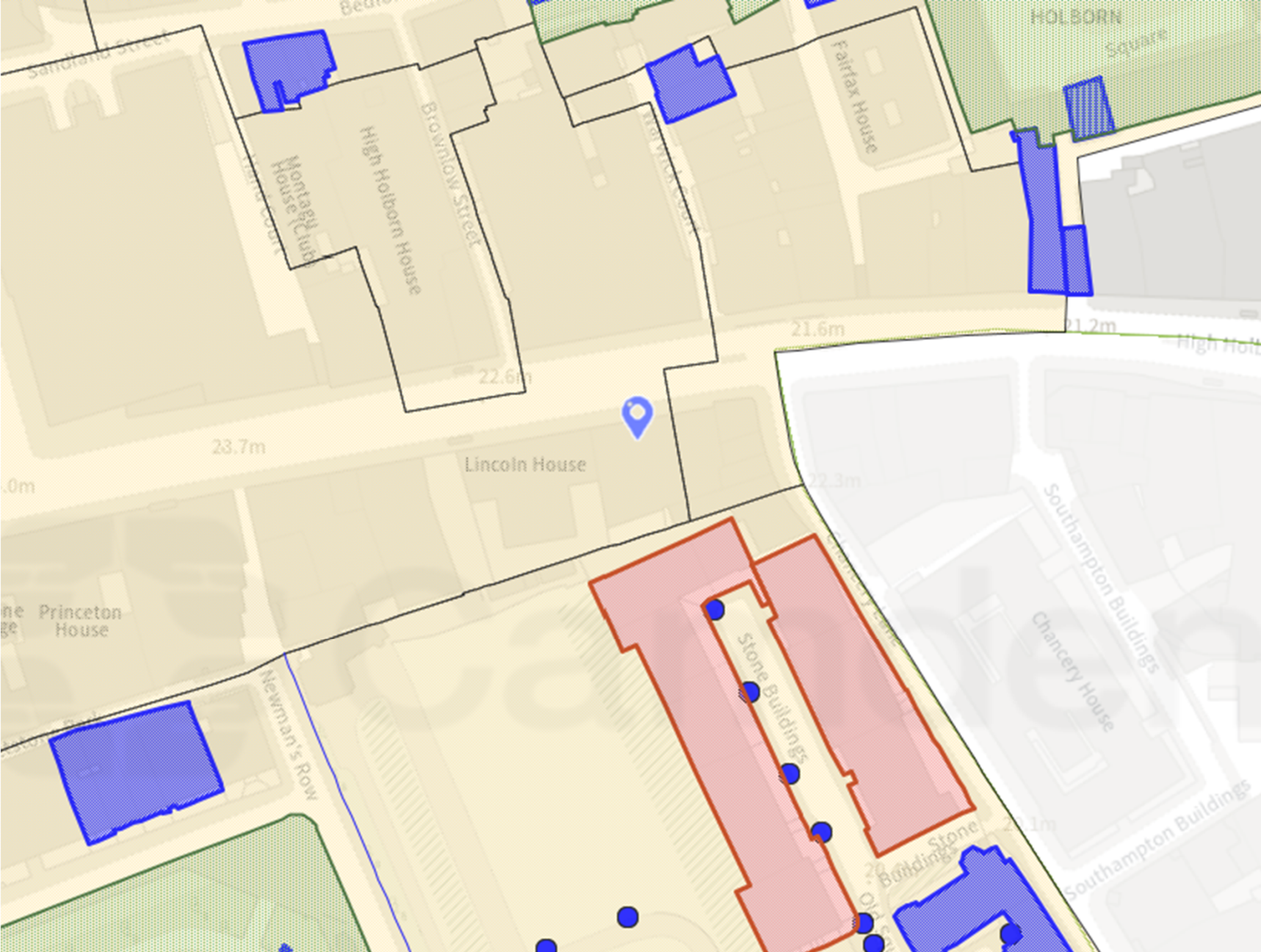
	<ul style="list-style-type: none"> <li>- It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).</li> <li>- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).</li> </ul>
5	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town &amp; Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>

6	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
7	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
8	<p>The Council supports schemes for the recycling of bottles and cans and encourages all hotels, restaurants, wine bars and public houses to do so as well. Further information can be obtained by telephoning the Council's Environment Services (Recycling) on 0207 974 6914/5 or on the website <a href="http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en">http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en</a>.</p>
9	<p>You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <a href="https://beta.camden.gov.uk/web/guest/construction-management-plans">https://beta.camden.gov.uk/web/guest/construction-management-plans</a> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.</p>

10	Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
11	This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, <a href="http://www.camden.gov.uk/planning">www.camden.gov.uk/planning</a> or the Camden Contact Centre on Tel: 020 7974 4444 or email <a href="mailto:env.devcon@camden.gov.uk">env.devcon@camden.gov.uk</a> .
12	A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a> . Please refer to the Wholesale; Business customers; Groundwater discharges section.
13	If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="http://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a> .
14	Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.







- Conservation Area
- Local List
- Listed Building
- I
- II
- II\*







3.1 EXISTING PHOTOS



Typical office space (dark, low ceiling heights)



Typical office space



Typical office space



Small cycle store with no dedicated cycle entrance



Small entrance lobby



Existing retail unit (upper ground)



Level 1 fire escape

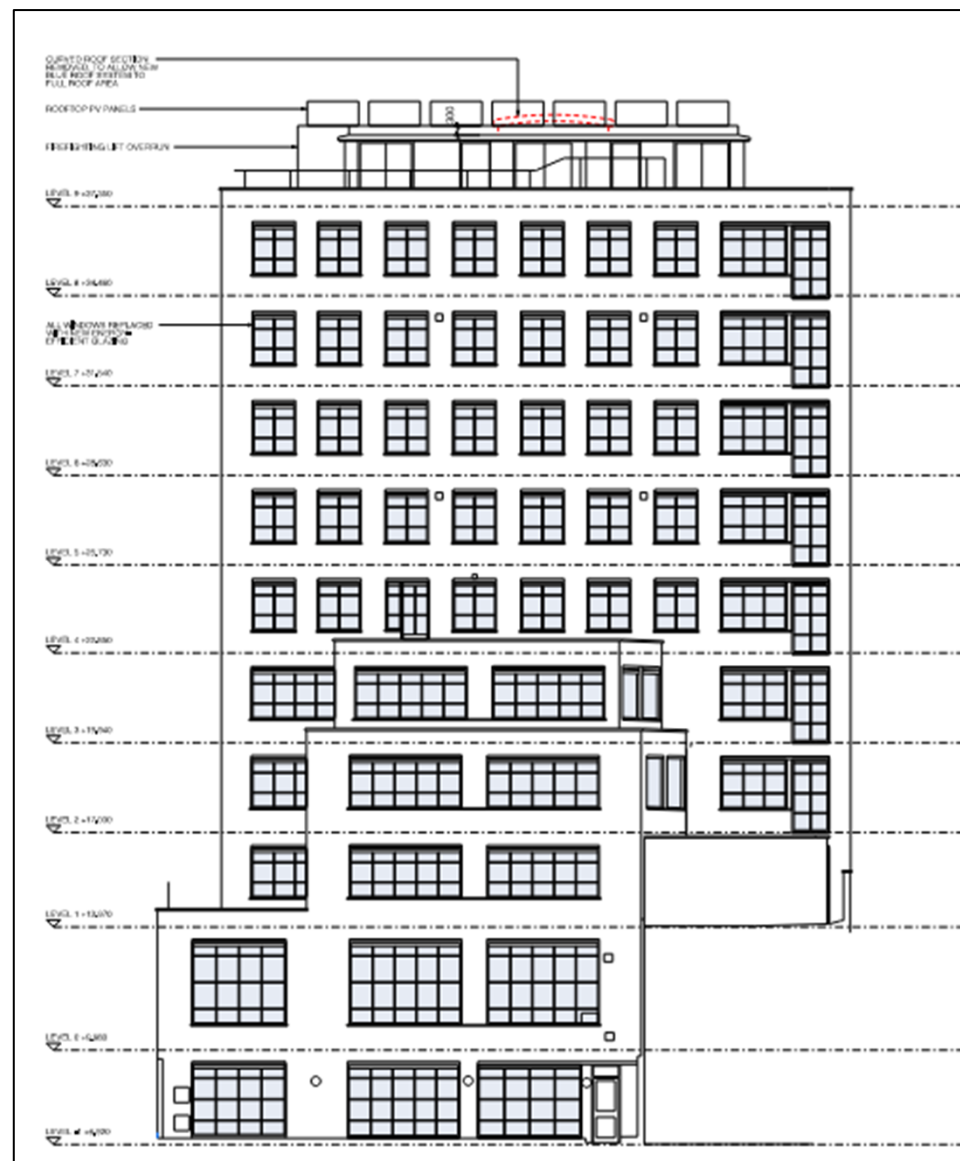
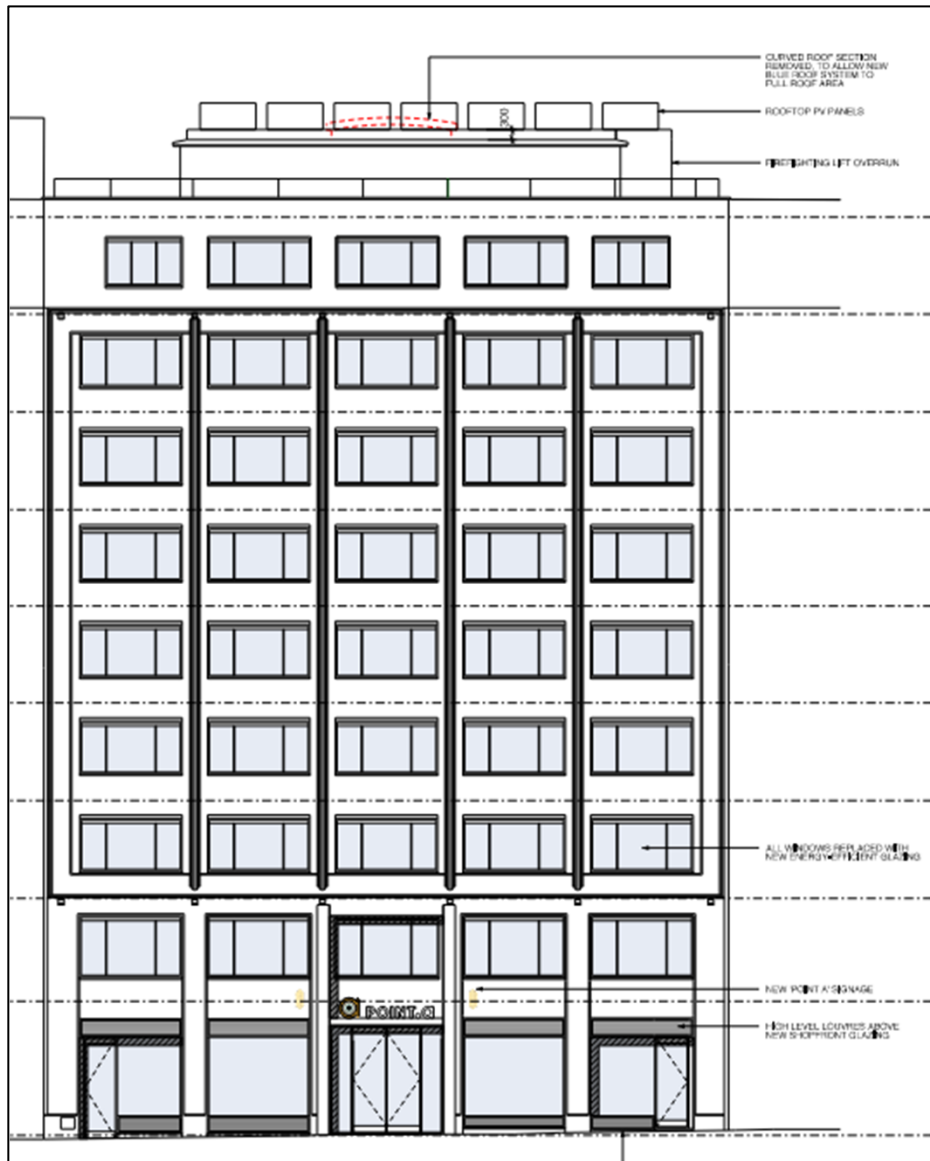


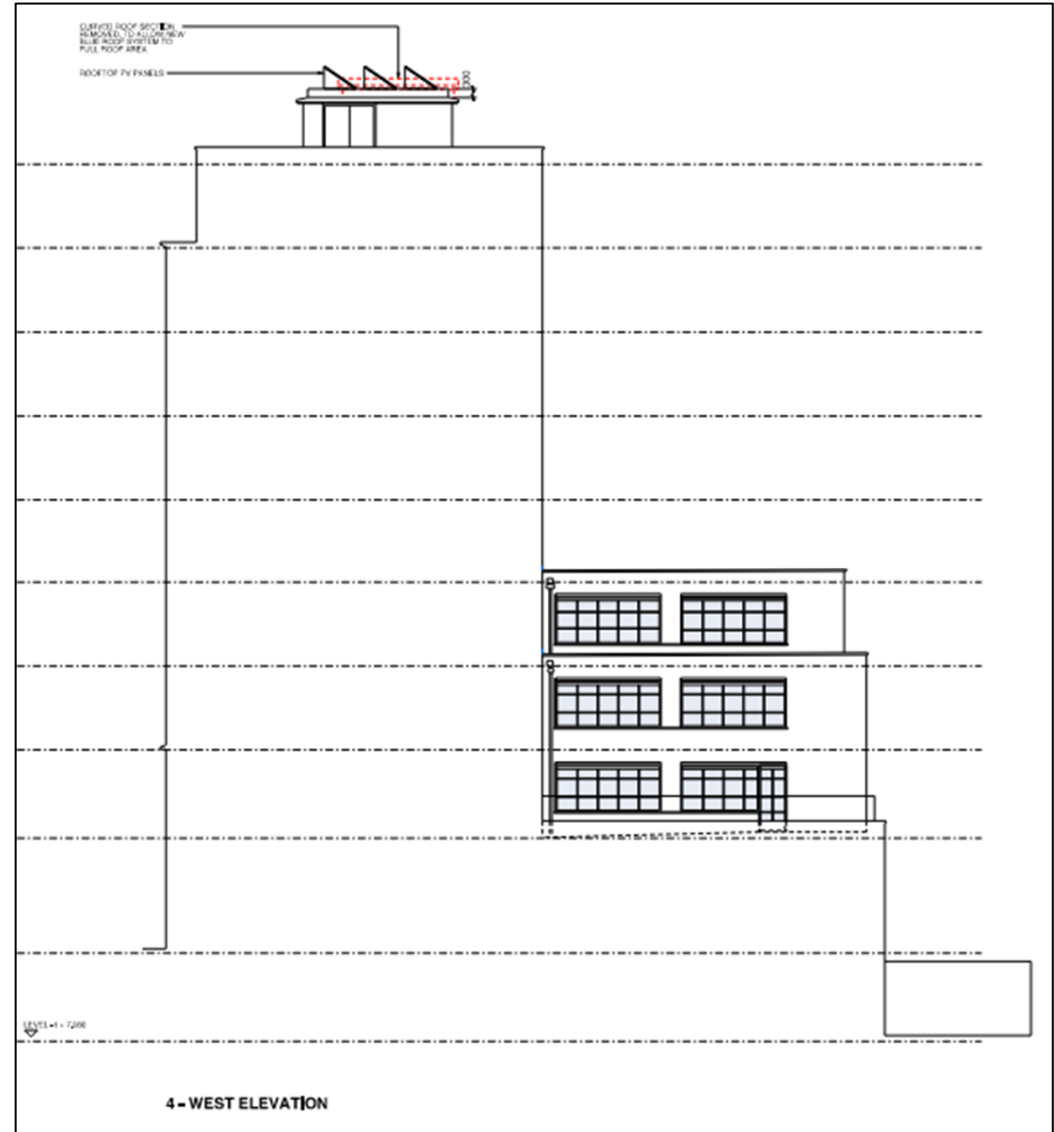
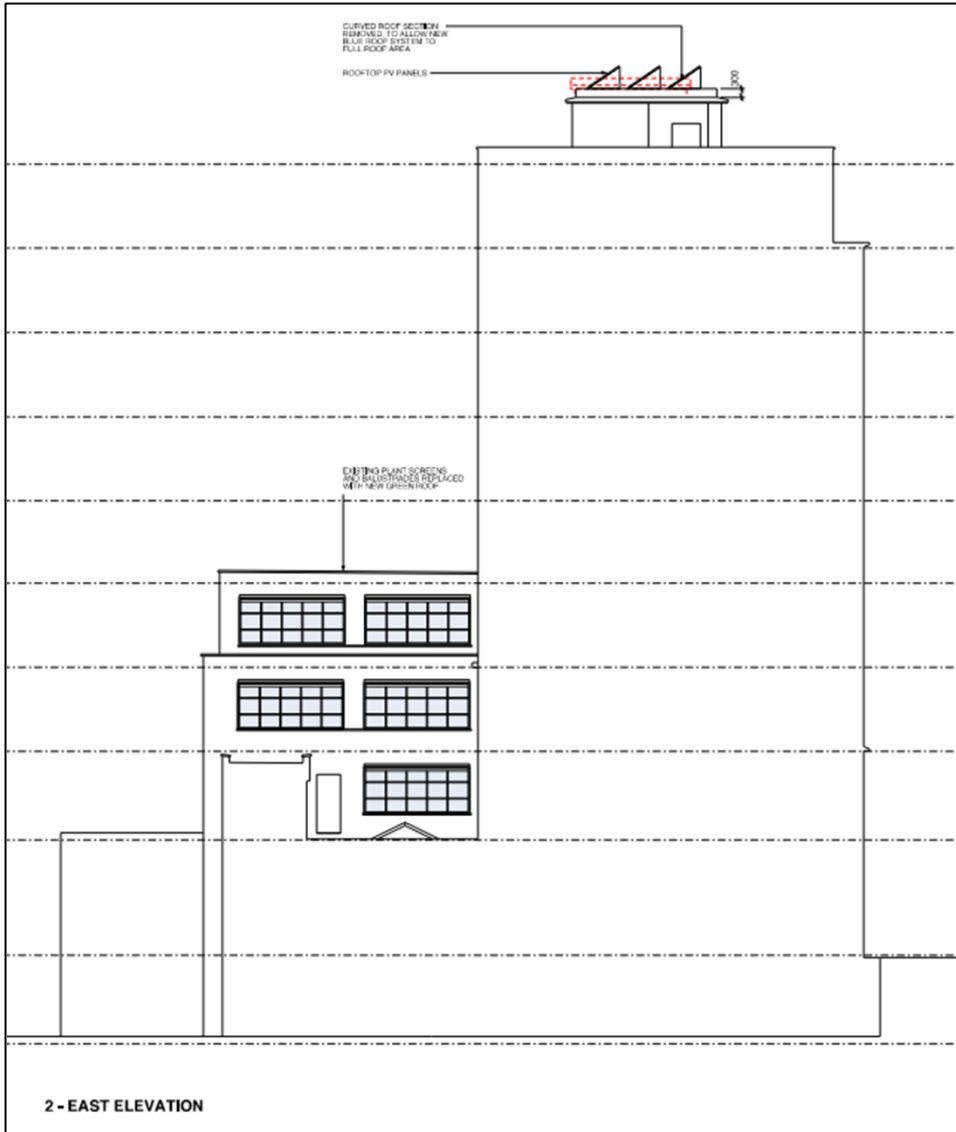
Existing single-glazed windows

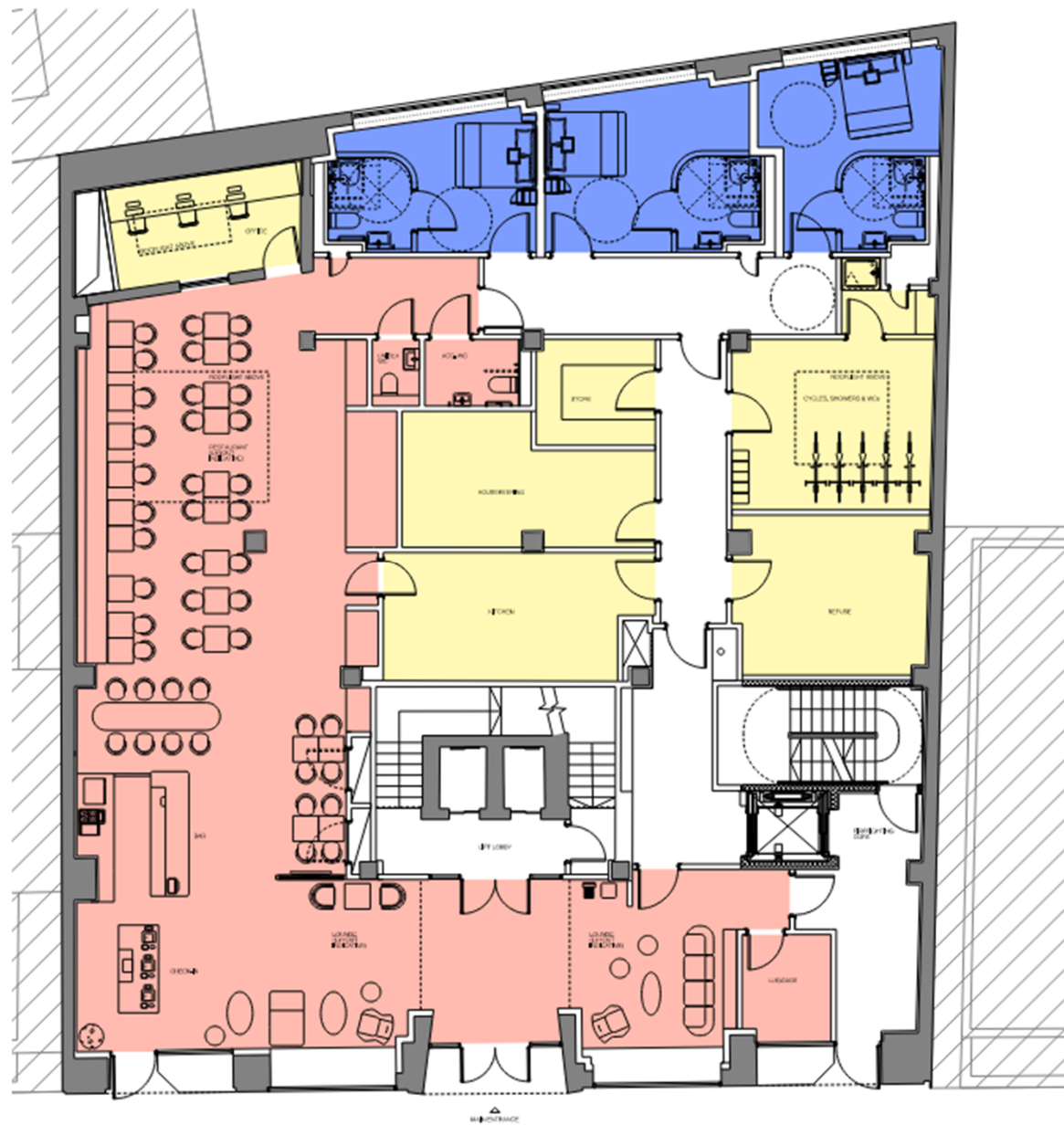


Narrow lift lobbies (not Part M compliant)



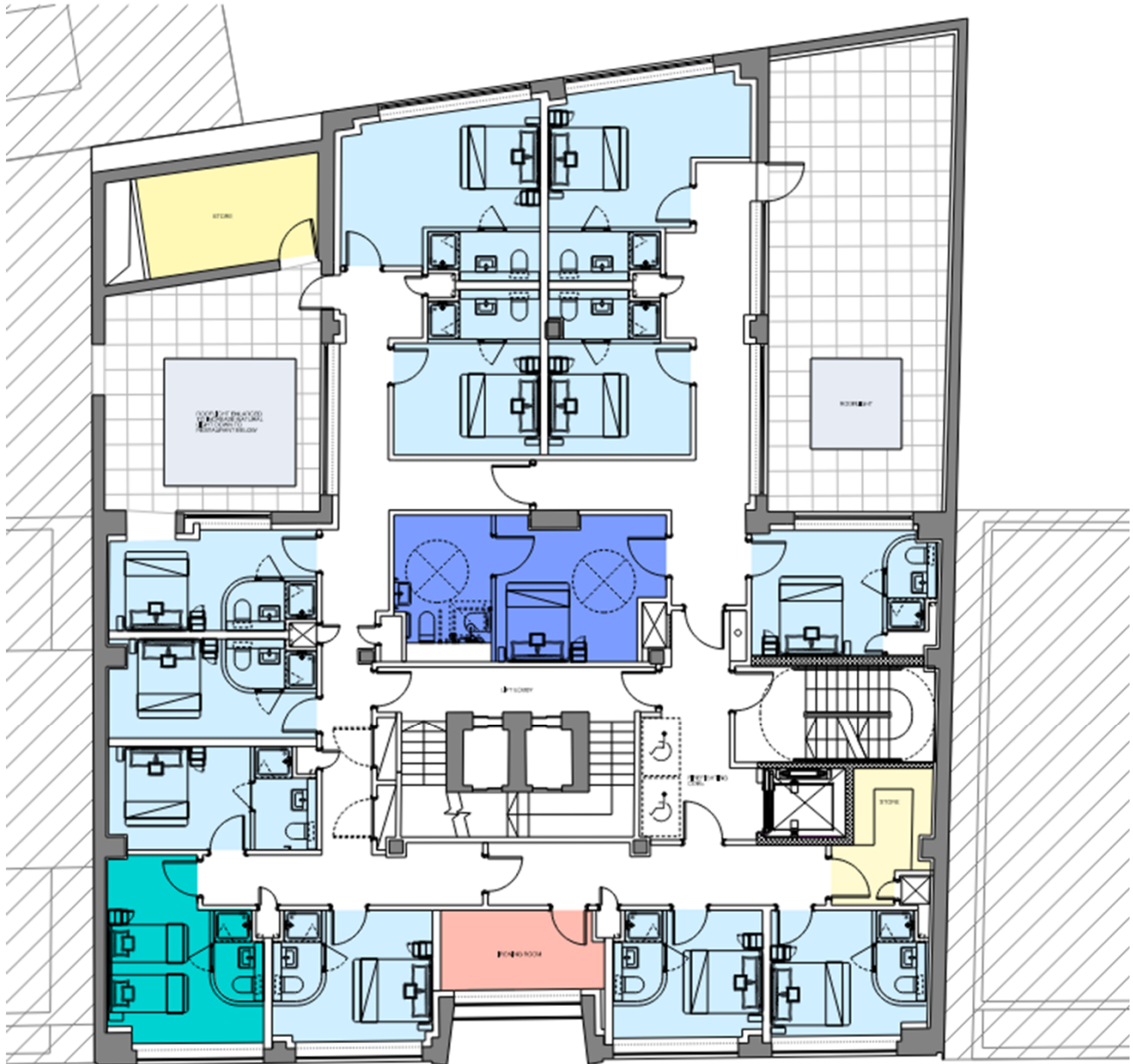




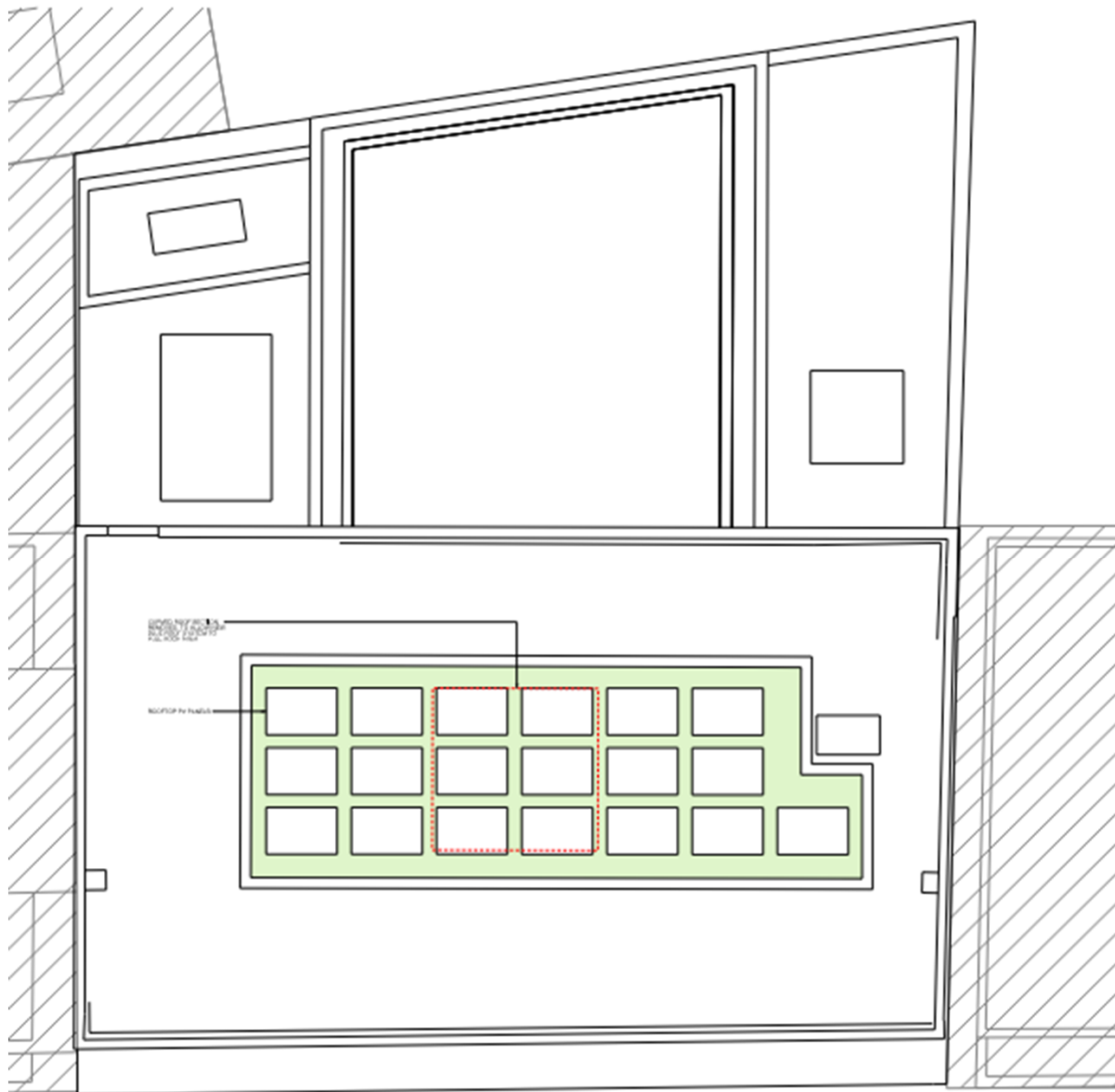


**KEY**

- HOTEL BEDROOM (DOUBLE)
- HOTEL BEDROOM (TWIN ZIP & LINK)
- HOTEL BEDROOM (ACCESSIBLE)
- HOTEL GUEST AMENITIES
- HOTEL STAFF AREAS
- PLANT AREAS
- GREEN ROOF



- KEY**
- HOTEL BEDROOM (DOUBLE)
  - HOTEL BEDROOM (TWIN ZIP & LINK)
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