

Address:	Lion House 72 - 75 Red Lion Street London WC1R 4NA		1
Application Number(s):	2026/1030/P	Officer: Lauren Ford	
Ward:	Holborn and Covent Garden		
Date Received:	16/03/2026		
Proposal:	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.		

Background Papers, Supporting Documents and Drawing Numbers:

Existing Drawings:

LHS-ORM-ZZ-ZZ-DR-A-12001, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12002, Rev C01; LHS-ORM-ZZ-00-DR-A-12100, Rev C01; LHS-ORM-ZZ-01-DR-A-12101, Rev C01; LHS-ORM-ZZ-02-DR-A-12102, Rev C01; LHS-ORM-ZZ-03-DR-A-1203, Rev C01; LHS-ORM-ZZ-04-DR-A-12104, Rev C01; LHS-ORM-ZZ-05-DR-A-12105, Rev C01; LHS-ORM-ZZ-06-DR-A-12106, Rev C01; LHS-ORM-ZZ-07-DR-A-12107, Rev C01; LHS-ORM-ZZ-RF-DR-A-12108, Rev C01; LHS-ORM-ZZ-B1-DR-A-12109, Rev C01; LHS-ORM-ZZ-AA-DR-A-12300, Rev C01; LHS-ORM-ZZ-BB-DR-A-12301, Rev C01; LHS-ORM-ZZ-NO-DR-A-12500, Rev C01; LHS-ORM-XX-EA-DR-A-12501, Rev C01; LHS-ORM-ZZ-SO-DR-A-12502, Rev C01; LHS-ORM-ZZ-WE-DR-A-12503, Rev C01.

Demolition Drawings:

LHS-ORM-ZZ-00-DR-A-12150, Rev C01; LHS-ORM-ZZ-01-DR-A-12151, Rev C01; LHS-ORM-ZZ-02-DR-A-12152, Rev C01; LHS-ORM-ZZ-03-DR-A-12153, Rev C01; LHS-ORM-ZZ-04-DR-A-12154, Rev C01; LHS-ORM-ZZ-05-DR-A-12155, Rev C01; LHS-ORM-ZZ-06-DR-A-12156, Rev C01; LHS-ORM-ZZ-07-DR-A-12157, Rev C01; LHS-ORM-ZZ-RF-DR-A-12158, Rev C01; LHS-ORM-ZZ-B1-DR-A-12159, Rev C01; LHS-ORM-ZZ-AA-DR-A-12350, Rev C01; LHS-ORM-ZZ-BB-DR-A-12351, Rev C01; LHS-ORM-ZZ-NO-DR-A-12550, Rev C01; LHS-ORM-ZZ-SO-DR-A-12552, Rev C01; LHS-ORM-ZZ-EA-DR-A-12551, Rev C01; LHS-ORM-ZZ-WE-DR-A-12553, Rev C01.

Proposed Drawings:

LHS-ORM-ZZ-00-DR-A-12200, Rev C01; LHS-ORM-ZZ-01-DR-A-12201, Rev C01; LHS-ORM-ZZ-02-DR-A-12202, Rev C01; LHS-ORM-ZZ-03-DR-A-12203, Rev C01; LHS-ORM-ZZ-04-DR-A-12204, Rev C01; LHS-ORM-ZZ-05-DR-A-12205, Rev C01; LHS-ORM-ZZ-06-DR-A-12206, Rev C01; LHS-ORM-ZZ-07-DR-A-12207, Rev C01; LHS-ORM-ZZ-RF-DR-A-12208, Rev C01; LHS-ORM-ZZ-B1-DR-A-12299, Rev C01; LHS-ORM-ZZ-AA-DR-A-12400, Rev C01; LHS-ORM-ZZ-BB-DR-A-12401, Rev C01; LHS-ORM-ZZ-NO-DR-A-12600, Rev C01; LHS-ORM-ZZ-EA-DR-A-12601, Rev C01; LHS-ORM-ZZ-SO-DR-A-12602, Rev C01; LHS-ORM-ZZ-WE-DR-A-12603, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12701, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12702, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12703, Rev C01.

Documents:

Cover Letter prepared by Newmark, 13 March 2026; Planning Statement prepared by Newmark, March 2026; Design an Access Statement prepared by Orms, March 2026; Air; Quality Assessment prepared by Hoare Lea, Revision 03, March 2026; Daylight and Sunlight Report prepared by Point 2, Version V2; Preliminary Ecological Appraisal, Rev 04, March 2026; Energy and Sustainability Statement, Revision A, March 2026; London Plan Fire Statement prepared by OFR, Revision R02, March 2026; Market Report prepared by Farebrother, January 2026; Transport Assessment prepared by Momentum Transport Consultancy, April 2026; Noise Impact Assessment prepared by Hoare Lea, Revision 03, 11 March 2026; Operator's Hotel Management Plan prepared by Blossom Platform Opco, March 2026; Overheating Assessment prepared by OG Energy, Revision A, March 2026; Statement of; Community Involvement prepared by Lowick, March 2026; Sustainability Statement prepared by OG Energy, Revision B, March 2026; Framework Travel Plan prepared by Momentum Transport Consultancy, March 2026; Construction/Demolition Management Plan Pro-forma, 02/06/2026, Version 3.1; Flood Risk & Sustainable Drainage Assessment prepared by Parmar Brook, Match 2026; Flood Warning and Evacuation plan prepared by Unda, June 2026; Life Safety – Comparison, prepared by RYBKA, 23/06/2026; Air Conditioning, Product Information.

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
C/O Agent	Newmark One Fitzroy, 6 Mortimer Street, London W1T 3JJ Belinda.Neilson@nmrk.com

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E(g)(i)	Office	4565	0	- 4565
C1	Hotel	0	4512	+4512
Total	All uses	4565	4512	-53

Parking details			
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	6	+6
Cycle – short stay	0	3	+3

EXECUTIVE SUMMARY

- i) The application site at Lion House, 72 - 75 Red Lion Street is an eight storey (plus lower ground floor) building within the Bloomsbury Conservation Area, Central London Area and Central Activities Zone (CAZ). It is highly accessible, near Holborn and Chancery Lane stations.
- ii) The proposal is a change of use of the building from office (Class E) to hotel (Class C1) with roof extensions. The proposal also includes the creation of terraces, new and replacement windows, rooftop plant enclosure, green roofs, PV's, alterations to the façade and associated works.
- 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 circumstances of this case. This application is supported by 14 months of marketing evidence, which demonstrates a lack of demand for the Class E Office space. The trends in market and modern workplace practices and the condition of 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 legal agreement.
- v) The site does not lend itself well to conversion to residential use given the sub-standard accommodation that would be provided.
- vi) 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.
- vii) The proposed external works would not impact upon the significance of the conservation area or result in harm to the conservation area. The activation of the front façade would be beneficial to the streetscape character and thus in a small way to that of the conservation area.
- viii) Subject to the recommended conditions and Section 106 obligations, the development would not harm neighbouring amenities, the local transport network or infrastructure.

- ix) The scheme complies with the development plan as a whole and is recommended for approval.

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:

Designation	Details
Central London Area	
Conservation Area	Bloomsbury
Local Plan Growth Area	Holborn
PTAL (Public transport accessibility)	6b
Underground development constraints and considerations	- Subterranean (groundwater) flow - Slope stability
Contaminated Sites Potential	1871-1877: Tobacco & Snuff Works 1909-1922: Unknown Industrial

Table 1 - Site designations and constraints

Description

1.2 Lion House is located at 72-75 Red Lion Street and comprises a building of eight storeys (plus lower ground) located on the western side of Red Lion Street.

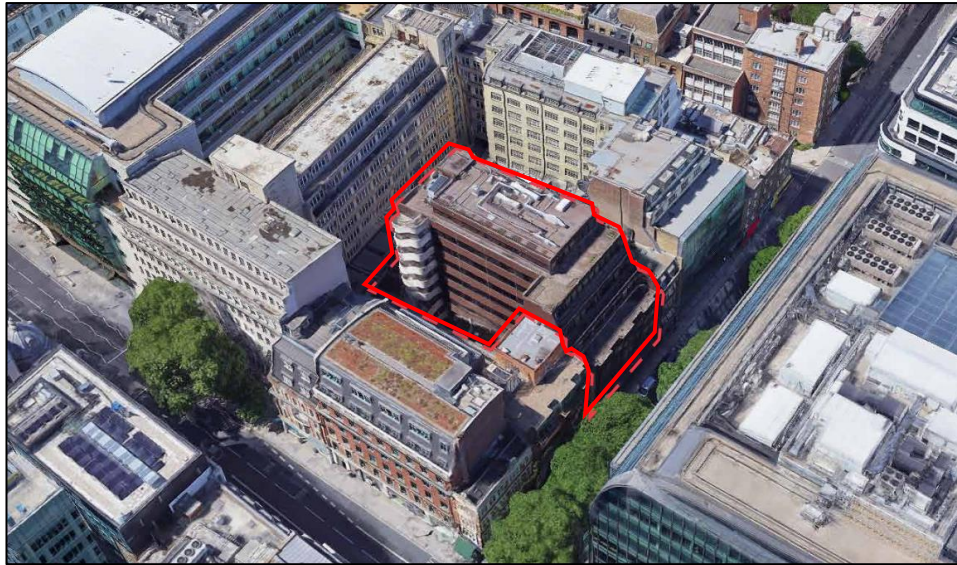


Figure 1: The existing site and building shown in red



Figure 2: Streetview of the application site

- 1.3 The building comprises 4,565 sqm of floorspace and has a lawful Class E use (Commercial, Business and Service).
- 1.4 The building has been predominantly vacant for the last 3 years, but with a charity tenant in situ for security purposes.

- 1.5 There are two points of pedestrian and vehicular access available from Red Lion Street.
- 1.6 The site is situated within the Bloomsbury Conservation area to which it makes a neutral contribution. The building is not listed, nor is it located in immediate proximity to any listed buildings. Figure 3 below shows the nearby heritage assets and the site.

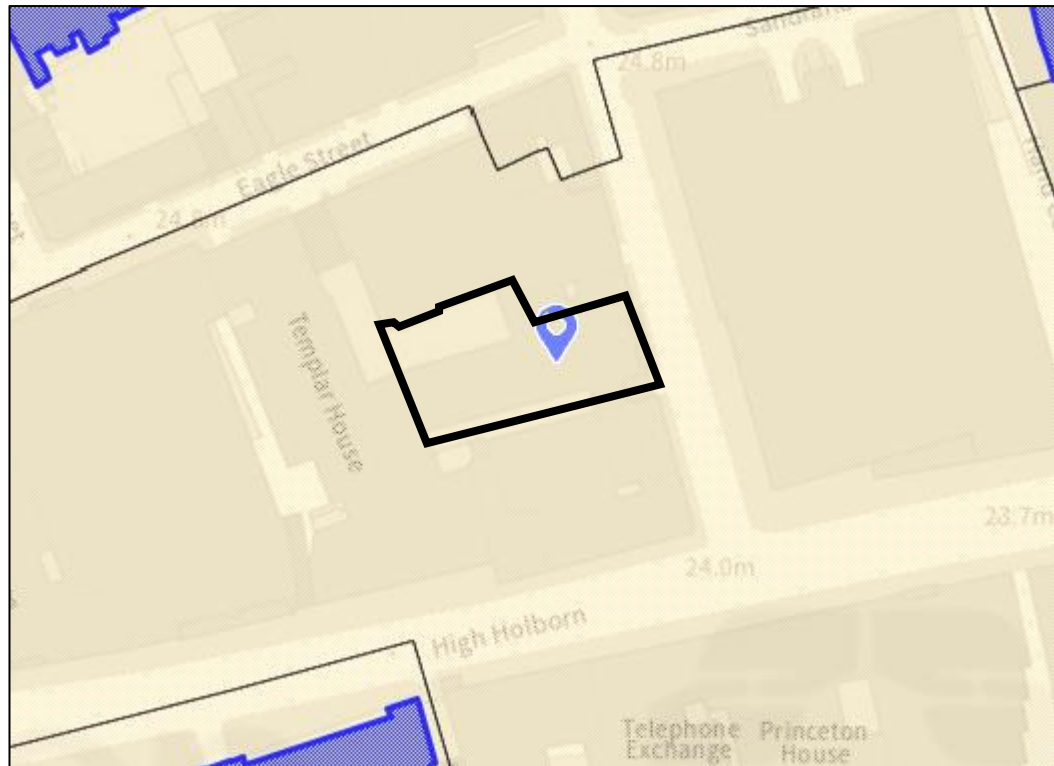


Figure 3: Map of the site and nearby heritage assets (conservation area shown in beige and Grade II listed buildings shown in blue)

- 1.7 The site is located within the Central London Area (CLA) and within the Holborn Local Plan Growth Area.
- 1.8 The surrounding area comprises a mix of uses including other commercial and office uses. Ground floor uses are predominantly retail (shops) and restaurants and cafes. There are also some residential units within the surrounding environment.
- 1.9 The site has a Public Transport Accessibility Level ("PTAL") 6b which is considered 'excellent' and is the best possible rating. Holborn and Chancery Lane London Underground stations are located approximately 350m west and 400m east of the site respectively. The closest bus stops are located on High Holborn, approximately 160m east of the site.

- 1.10 The site is not in a local flood risk zone or a previously flooded street, however there is a risk of surface water flooding identified in the vicinity of the building.

2. THE PROPOSAL

- 2.1 The proposal is for a change of use of the existing building from Office (Class E) to Hotel (Class C1). The hotel would comprise 107 rooms (including 49 private bedrooms and 58 capsule chambers). At ground floor level, a publicly accessible café and reception area would be provided. To the north at lower ground floor level, a courtyard would be provided that would function as an amenity space and publicly accessible ancillary co-working space/café.
- 2.2 Extensions are proposed at roof level, including a mansard roof extension to the eastern (Red Lion Street) elevation and an extension to the western elevation, resulting in an uplift of 92m² at 7th floor level. Other external changes proposed include the following:
- Creation of terraces along Red Lion Street elevation at levels 5, 6 and 7;
 - Rooftop plant enclosure;
 - Green roofs at levels, 2, 5, 6, 7 and main roof level;
 - New and replacement windows to all elevations;
 - PV panels at roof level;
 - Alterations to the façade; and
 - Cleaning of brickwork.
- 2.3 9 cycle parking spaces (6 long-stay and 3 visitor) would be provided at lower ground floor level. No vehicle access or car-parking spaces would be provided.
- 2.4 The main access to the building would be at ground floor level on Red Lion Street in the middle of the building with a fire exit door to either side of this.
- 2.5 There is a 53sqm decrease in floorspace due to the proposed thermal upgrade to the building envelope, whereby additional insulation is proposed.

3. RELEVANT HISTORY

The site

- 3.1 **PS9705032R1** – *Change of use and works of conversion from offices (Class B1) to an apart-hotel (Class C1) providing 80 apartments, plus 250 m² restaurant floorspace (Class A3) and associated car-parking for five cars at basement level. Granted 19/12/1997.*

The area (including adjacent parts outside of Borough)

- 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* by City of London 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 **Kingsway House, 103 Kingsway (2024/3493/P):** *Change of use of existing building from commercial use (Class E) to apart hotel use (Class C1), extension and remodelling of upper storeys to accommodate further Class C1 apart hotel floorspace, including new 8th floor, provision of ancillary facilities and retention of Class E commercial unit at ground floor level and associated works including refurbishment of façade. Granted* subject to a s106 legal agreement, 12/11/2025.
- 3.7 **Northumberland House, 303-306 High Holborn (2025/5750/P):** *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. Resolved to be granted at committee*, subject to Section 106 legal agreement, 13/04/2026.

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 and surface water drainage.

Local groups

Bloomsbury Conservation Area Advisory Committee

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

Bloomsbury Association

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

Adjoining occupiers

- 4.4 3 x site notices were displayed for the planning application on 25/03/2026 (consultation end date 18/04/2026) as follows:

- 1 site notice displayed outside the application site on Red Lion Street;
- 1 site notice displayed outside 79-80 High Holborn; and
- 1 site notice displayed outside 34 Eagle Street.

- 4.5 A press notice was published on 26/03/2026 (consultation end date 19/04/2026).

- 4.6 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](#)

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

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

[D4 Delivering good design](#)
[D5 Inclusive design](#)
[D11 Safety, security and resilience to emergency](#)
[D12 Fire safety](#)
[D14 Noise](#)
[E1 Offices](#)
[E10 Visitor infrastructure](#)
[E11 Skills and opportunities for all](#)
[HC1 Heritage conservation and growth](#)
[HC6 Supporting the night-time economy](#)
[SI 1 Improving air quality](#)
[SI 2 Minimising greenhouse gas emissions](#)
[SI 3 Energy infrastructure](#)
[SI 4 Managing heat risk](#)
[SI 1 Improving air quality](#)
[SI 12 Flood risk management](#)
[SI 13 Sustainable drainage](#)
[T1 Strategic approach to transport](#)
[T2 Healthy Streets](#)
[T3 Transport capacity, connectivity and safeguarding](#)
[T4 Assessing and mitigating transport impacts](#)
[T5 Cycling](#)
[T6 Car parking](#)
[T6.4 Hotel and leisure uses parking](#)
[T6.5 Non-residential disabled persons parking](#)
[T7 Deliveries, servicing and construction](#)
[T9 Funding transport infrastructure through planning](#)
[DF1 Delivery of the Plan and Planning Obligations](#)
[M1 Monitoring](#)

London Plan Guidance (LPG)

[Accessible London SPG](#)
[Optimising Site Capacity: A Design-led Approach 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 C1 Health and wellbeing](#)
[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 CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[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 CPG - March 2019](#)
[Air Quality - January 2021](#)
[Amenity - January 2021](#)
[Biodiversity CPG - March 2018](#)
[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Employment sites and business premises - January 2021](#)
[Energy efficiency and adaptation - January 2021](#)
[Transport - January 2021](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

Bloomsbury Conservation Area appraisal and management strategy (2011).

Draft Camden Local Plan (DCLP)

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 examination of the draft Local Plan is currently ongoing and hearings were held from 19 May 2026 to 11 June 2026.

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.

The Proposed Submission Draft Camden 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:

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

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 A marketing report prepared by Farebrother has been submitted which has been reviewed by Council's Inclusive Economy Team.
- 7.3 The building has been marketed for office use via various platforms since March 2024, including a visible letting board displayed from April 2024. The building has been actively marketed for 14 months. It is noted that while the 14-months of marketing falls short of the 2-year requirement within Policy E3 of the Local Plan, the emerging Local Plan includes a reduced requirement for 12 months of marketing.
- 7.4 An interest schedule has been provided, with 46 enquiries, and 5 viewings dated from April 2024-January 2026. Enquiries have struggled to be converted into viewings, largely due to the condition and outdated specification of the building.
- 7.5 In its current condition, the following factors are identified as hindering the building's potential to attract tenants:
- Location: Access and visibility issues;
 - Building condition: the building presents an outdated and unappealing image. Key elements, such as lifts and mechanical and electrical (M&E) systems require substantial upgrades. The building lacks internal amenity spaces that are now a standard expectation among modern occupiers. The building lacks sustainability and energy credentials and is outdated both internally and externally; and
 - Demand: Most tenants seeking space of this size prefer to occupy 1-2 floors rather than an entire self-contained building. Those with self-contained requirements of above 2,000 sqm are often those in the serviced office market who are unwilling to take a lease on a conventional structure.
- 7.6 Prospective tenants have proposed leasing arrangements involving the payment of rates and service charge only, reflecting the markets perception of the property's poor condition (as outlined above). This is also not a sustainable long-term solution.
- 7.7 Those seeking a self-contained building have not been willing to consider it without significant upfront works being undertaken such as bike storage, shower facilities, outdoor terracing and modern M&E systems.
- 7.8 To attract the highest level of interest, the property was offered to let on an 'offers invited' basis.

- 7.9 Overall, the evolving trends in the market and modern workplace practices do not align well with the location of this building. Further, significant investment would be required to bring the building up to a standard suitable for modern occupiers, and even then, this does not guarantee leasing success. For these reasons it has been demonstrated why the site is not suitable for continued office use.

Preferred residential use

- 7.10 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

- 7.11 During pre-application discussions the applicant produced a residential study which explored the potential for providing residential on the site which is also outlined in the Design and Access Statement submitted for this application. This study demonstrates that in theory 38 residential units could be provided on-site, as shown through Figure 4 below.



Figure 4: Possible proposed residential floor plans (Source: Design and Access Statement, page 44)

7.12 However, in this instance, the building is considered unsuitable for conversion to residential due to a combination of design, compliance and delivery constraints including:

- Majority single aspect units with awkward layouts, restricted by existing structural grid and fenestration;
- Poor standard of accommodation for lower-ground floor units;
- Building is above 18m tall making it a high-risk building; and
- Additional core would result in further demolition of existing building.

Proposed hotel use

7.13 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.

7.14 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.

7.15 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.

- 7.16 With regard to (f), the site has a PTAL rating of 6b, which is the highest 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 agreement. In relation to (g), this is discussed within 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.
- 7.17 The proposed hotel would have a GIA of 4512 sqm and provide 107 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 19 below).
- 7.18 Condition 20 requires the provision of 6 (5%) 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.
- 7.19 The applicant has submitted an Operator's Hotel Management Plan which sets out protocols for the likes of transport, access and security, cleaning, maintenance and waste. A management plan would be secured by Section 106 legal agreement.
- 7.20 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.

Compensation for loss of employment space

- 7.21 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.
- 7.22 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.
- Floorspace lost: 3,717 sqm.
 - Employment density: 12 sqm per worker.
 - Jobs lost: $3717 / 12 = 309$ jobs lost.
 - Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use): $309 - (107 \times 0.2) = 256$.
 - Full time jobs lost $256 \times 21\% = 54$ [% of residents who work in Camden]
 $54 \times \text{£}3,995$ [cost to provide training per employee] = $\text{£}211,735$.
- 7.23 The contribution amount ($\text{£}211,735$) for the loss of employment space will be secured by Section 106 legal agreement.

8. DESIGN AND HERITAGE

Designated and non-designated heritage assets

- 8.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act 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.

Bloomsbury Conservation Area – No Harm

- 8.2 The Bloomsbury Conservation Area extends from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and Tottenham Court Road in the west to King's Cross Road in the east. It is widely considered to be an internationally significant example of town planning and is noted for its

formally planned arrangement of streets and the contrasting leafy squares which gives it its special significance.

- 8.3 The application site is identified as making a neutral contribution to the conservation area. The proposal would not detract from the special significance of the conservation area. Due to the linearity and width of Red Lion Street, views of Lion House are both oblique and partial; the building therefore only contributes in a limited way to the appearance and character of the streetscape. Although roof extensions are proposed, they are sufficiently limited in extent and are sensitively designed with appropriate materials. As such, the proposed works would not impact upon the significance of the conservation area or result in harm to the conservation area in this instance and location. The activation of the front façade would be beneficial to the streetscape character and thus in a small way to that of the conservation area.

Urban Design

- 8.4 The existing building is a 1970's Seifert building that provides office space over nine floors and is constructed in brown brick.
- 8.5 The existing street is a local neighbourhood street with shops and restaurants. To the north, the street has more active and lively frontages, and to the south, there are some larger institutional buildings with some blank frontages. There is an opportunity to improve the contribution the site makes to the townscape through activating the ground floor along Red Lion Street and introducing landscaping across the building and site.

Design Response

- 8.6 The proposal seeks refurbishment and extension of the existing building.
- 8.7 The proposal comprises a range of interventions that would extend the life of the building, with an architectural approach that reflects the character of the existing building and surrounding area and adds to it in a contemporary manner. This refurbishment-led scheme demonstrates the progressive way in which Camden's existing building stock can support growth and environmental considerations front and centre.
- 8.8 Views of the building as proposed are included in Figures 5 & 6 below.



Figure 5: Proposed street level visualisation from Red Lion Street looking north of the building



Figure 6: Proposed render of the upper levels of the building from Red Lion Street

Scale and Massing

- 8.9 The proposal seeks to extend the building upwards at roof level, including a mansard roof extension on the east façade and extension on the western elevation.

- 8.10 The proposed extensions would be single storey and read as subordinate additions, integrating appropriately with the existing buildings proportions. Both extensions would have limited visibility from the streetscape.
- 8.11 The dormer positions are offset from the pattern of the fenestration on the existing floors and are centred to the structured grid, creating balance in the composition.
- 8.12 At roof level a plant enclosure and other additions such as PV's are proposed. The plant enclosure would be setback from the edges of the building and given its positioning would have limited visibility from the public realm.

Public Realm

- 8.13 The proposed design would integrate the goods entrance into the façade and as such it reads as one united frontage rather than two separate entrances and entities. On either side of the main entrance doors glazed bays with bi-folding windows are proposed that open the internal spaces and activate the frontage. Each side bay features a raised ledge that functions as a bar leaner, to encourage street level activity. An operational management plan is to be secured by Section 106 legal agreement which would address the use of this area.
- 8.14 The new entrance and frontage on the ground floor fronting Red Lion Street makes a positive contribution to Red Lion Street by creating an active and publicly accessible entrance. The design contrasts in colour to the existing building, using bolder colours; a theme that is present in the shop front and pub designs along Red Lion Street.
- 8.15 The ground floor proposal responds positively to the existing architecture of the building by carrying the rhythm of the elevation through with the creation of five bays. The composition of the elevation and materials used at ground floor speak to more typical shop compositions whilst utilising modern materials to differentiate from the existing brickwork of the building. This way, the new intervention is clearly iterated and recognisable on the street.
- 8.16 The ground floor level proposals are key to contributing to the local high street function of Red Lion Street.

Detailed Design and Materiality

- 8.17 It is proposed to clean and repair the existing bricks which would breathe new life into the existing materiality.
- 8.18 The colours proposed for the ground floor frontage (green and white) would contrast positively with the greys, blacks and browns found on the street and the proposed materials, which include glassfibre reinforced concrete and

aluminium are considered appropriate for the context. Condition 4 would secure details of these materials.

- 8.19 The mansard extension is a zinc clad addition, a typical roof material. Condition 4 would secure details of the materials.
- 8.20 The western extension would have a brick finish to match that of the existing building, with the opportunity to reuse existing bricks from demolition.
- 8.21 The introduction of greenery onto the terraces is a positive addition and Conditions 6 & 7 would secure the details and implementation of this planting.
- 8.22 The northern courtyard at lower ground floor level is a key space for this project, creating valuable amenity space for guests, as well as those visiting and using the co-working space/café.
- 8.23 Overall, the proposed development respects and responds to the local context and streetscape, providing a well-designed building in accordance with policy D1 of the Local Plan and would not result in harm to heritage assets, in accordance with Policy 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 portion of the rooms (at lower ground floor level) are windowless. 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 not to 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 acceptable for occupation as visitor accommodation.

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 future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

Daylight and sunlight

- 10.2 A Daylight and Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties.
- 10.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 10.4 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

- 10.5 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
 - **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level ("a working plane") inside a room that will have a direct view of the sky.
 - *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
 - **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches

unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.

- *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*

10.6 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

10.7 The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

10.8 While the proposal is not a housing scheme, in this case it is still considered that similar principles apply to optimising the use of sites in the Central London Area while maintaining reasonable levels of daylight and sunlight for existing residents.

10.9 For urban development densities found more typically in Camden, in areas such as Bloomsbury, officers note that retained VSC values of 15% to 20% can be tolerated as an acceptable norm. Often, windows at lower floors of residential buildings have VSC values of less than 10%.

10.10 The nearest residential buildings in the vicinity of the site are outlined through Figures 7 & 8 below.



Figure 7: The proposed development site identified through blue and surrounding residential properties identified through purple

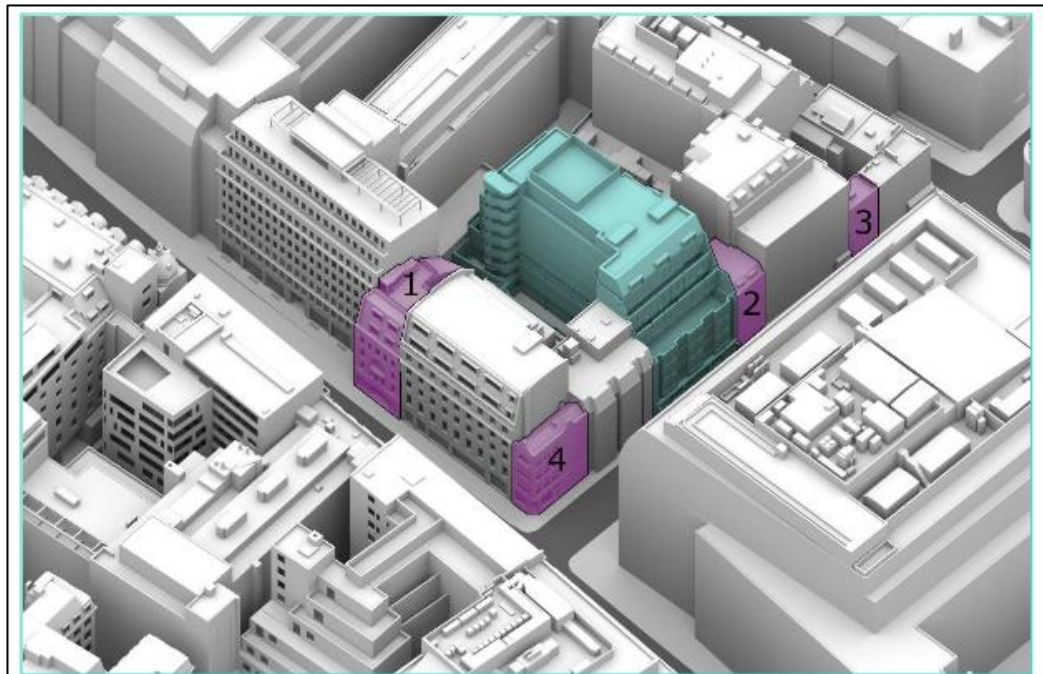


Figure 8: The proposed development site identified through blue and surrounding residential properties identified through purple.

Assessment

- 10.11 Due to their location in relation to the proposed development, the properties at 67 Red Lion Street and 80 High Holborn (labelled as 3 and 4 in Figures 7 & 8 above) would not be impacted by the proposed development, therefore an assessment on these properties has not been undertaken. Similarly, an assessment of the nearby properties in commercial use has not been undertaken.
- 10.12 Overshadowing assessments have not been undertaken as there are no amenity spaces near the proposed development likely to be impacted.

79-80 High Holborn (labelled as 1)

- 10.13 All windows would comply with BRE guidelines with respect to VSC and APSH. One room (R1/114) does not meet the NSL test, with a 21.4% reduction. This reduction is only slightly above the BRE guidelines by 1.4%. Further this room is understood to be a bedroom which the BRE guidelines advise as being less important. Given the minor nature of the non-compliance and the fact that this window complies with the VSC and APSH tests, the overall impact is considered to be acceptable.

71 Red Lion Street (labelled as 2)

- 10.14 All windows would comply with the BRE guidelines with respect to VSC, NSL and APSH.

Privacy and Overlooking

- 10.15 Local Plan Policy A1 and CPG Amenity seeks to ensure that developments should be designed to protect the privacy of both existing and proposed dwellings and mitigation measures should be installed where necessary.
- 10.16 The proposal would introduce new terraces at levels 5, 6 and 7 along the Red Lion Street elevation. The proposed terraces are both setback from and located at a higher level than the adjoining residential property at 71 Red Lion Street. There would be no direct line of sight from the terraces to windows of adjoining properties. On this basis the proposed terrace would not result in any unacceptable privacy or overlooking impacts on neighbouring occupiers.
- 10.17 The proposal would also introduce new windows associated with the dormer extension. These would face out towards Red Lion Street and would not result in any unacceptable privacy or overlooking impacts on neighbouring occupiers.

Noise and vibration

- 10.18 Policy A4 of the Local Plan seeks to ensure that noise and vibration are controlled and managed.
- 10.19 The proposal includes a number of plant items within an acoustic enclosure on the eastern edge of the roof. This includes condenser units, air-source heat pumps and air handling units. As such, a noise impact assessment has been submitted by the applicant as part of the application submission. This has been reviewed by Council's Environmental Health (Pollution) Officer.
- 10.20 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, Camden Council's Local Plan, version June 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound".

- 10.21 The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 10.22 The assessment indicates that the proposed installation should be capable of achieving the Camden's environmental noise and odour criteria at the nearest and potentially most affected noise sensitive receptors.
- 10.23 A Noise Officer has been consulted and is satisfied that the submitted noise impact assessment and associated technical details meets the Council's Local Plan guidelines and is therefore acceptable in environmental health terms, subject to conditions.
- 10.24 Conditions 13 & 14 have been included which relate to external noise levels, anti-vibration isolators and sound insulation and noise reduction.
- 10.25 It is considered that these conditions would ensure the amenity of nearby residential is protected in terms of noise and vibration.

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 approximately 50m north of 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 PTAL rating of 6b (excellent).
- 11.7 The closest London Underground stations to the site are Holborn and Chancery Lane, located approximately 350m west and 400m east of the site, respectively. The closest bus stops are located on High Holborn, approximately 160m east of the site.
- 11.8 The site is easily accessible from the Strategic Cycle Network, with Cycleway C41 on Red Lion Street providing access to King's Cross and St Pancras stations.
- 11.9 The nearest Santander cycle hire docking station is located opposite the site.

- 11.10 The nearest dedicated parking bay for dockless rental e-bikes and rental e-scooters is also located opposite the site. However, this bay is already showing signs of overcapacity and increasing demand.
- 11.11 Camden's Transport Strategy department 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 a grade of 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is our 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 TRICS database was used to derive the anticipated total person trip rates for the proposed development. The net change in multi-modal trips is shown through Figure 9 below.

Mode	Daily	AM Peak (08:00 – 09:00)	PM Peak (17:00 – 18:00)
Underground, metro, light rail, tram	+1067	+60	+52
Train	+763	+43	+38
Bus, minibus or coach	+391	+22	+19
Taxi	+27	+1	+2
Motorcycle, scooter or moped	+41	+2	+2
Driving a car or van	-105	-15	-14
Passenger in a car or van	-8	-2	-2
Bicycle	+286	+16	+14
On foot	+269	+15	+13
Total	+2,731	+142	+124

Figure 9: Net change in multi-modal trips (Source: Transporty Assessment, Table 6.9)

- 11.13 The proposed development will result in a significant increase in person trips (2,731 trips/day). Based on other developments in the area, it is anticipated that a high volume of the walking and cycling trips generated by the proposed hotel after a significant period of the site's vacancy is 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.

- 11.14 An Active Travel Zone (ATZ) assessment included in the TA focuses on five routes to key destinations. The analysis demonstrates there are opportunities for public realm improvements, enhanced lighting, greenery, seating, and upgraded cycling and walking environments. This is pertinent, considering the Council's HLN project. 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. This is further discussed in paragraph 11.36 below.

Travel Planning

- 11.15 A Framework 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 should be set for both walking and cycling in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.
- 11.16 A Travel Plan and an associated monitoring and measures contribution of £11,348 will be secured by Section 106 legal agreement.

Cycle Parking

- 11.17 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:
- 11.18 C1 use, Hotels
- 1 space per 20 bedrooms long-stay; and
 - 1 space per 50 bedrooms short-stay.
- 11.19 Six long stay and three visitor cycle parking spaces will be provided at basement level, accessed via the stairs with a cycle gully and also a lift. This is in accordance with the London Plan standards and CPG Transport.
- 11.20 Full cycle parking details will be secured by Condition 15.

Car Parking and Vehicle Access

- 11.21 The site is located in controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday.
- 11.22 The entire development would be secured as car-free by Section 106 legal agreement.

Coach Parking and Taxis

11.23 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).

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

Construction Management

11.25 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). An outline Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.

11.26 The site is located near High Holborn (A40), which forms part of the 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. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

11.27 More detailed Construction Management Plan (CMP) will be secured by legal agreement in accordance with Local Plan Policy A1.

11.28 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.

11.29 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction.

- 11.30 Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development would be secured by Section 106 legal agreement in accordance with Policy A1 of the Camden Local Plan.
- 11.31 A requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction works would be secured by Section 106 legal agreement.

Deliveries and Servicing

- 11.32 Delivery and servicing will take place on street in line with the existing arrangements. The proposed development is expected to generate six delivery and servicing vehicle trips per day. A Delivery and Servicing Plan (DSP) will be secured by legal agreement. This will help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated.

Highways works

- 11.33 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 by S106 legal agreement. The works will also include repaving the footway and the removal of the vehicular crossover directly adjacent to the site on Red Lion Street.

Pedestrian, Cycling and Environmental Improvements

- 11.34 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 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 our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.
- 11.35 In line with the increase in walking and cycle trips generated by the proposed development, being an increase in 2,731 trips/day, as shown through Figure 9 above and further prompted by the requested Travel Plan, we will secure a financial contribution of £70,000 by Section 106 legal agreement towards the HLN scheme, specifically for traffic management measures, improving

bus journeys on High Holborn and relocation and upgrade of the pedestrian crossing on High Holborn to align more closely with the Red Lion Street junction.

Micro and Shared Mobility Improvements

- 11.36 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.
- 11.37 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.
- 11.38 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

- 11.39 The proposal is acceptable in terms of its transport impacts and in compliance with relevant development plan policies subject to the following conditions and planning obligations being secured by Section 106 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 hotel;
 - Highways contribution of £20,000;
 - Cycle/e-scooter hire improvements contribution of £10,000;
 - CMP;
 - CMP implementation support contribution of £30,513 and CMP impact bond of £32,000;
 - Delivery and Servicing Plan;
 - Pedestrian, Cycling and Environmental Improvements contribution of £70,000; and
 - Requirement to form a construction working group.

12. SUSTAINABILITY AND ENERGY

12.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

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.

Energy and carbon reductions

12.3 The proposal qualifies as non-domestic major refurbishment (over 1,000sqm) which has less stringent energy reduction targets compared to a non-domestic new build major development proposal (over 1,000sqm), as outlined under the CPG (Energy Efficiency and Adaptation). However, as discussed below, the proposals both meet and exceed the energy reduction targets for both non-domestic major refurbishment major schemes, as well as the more stringent non-domestic new build major development schemes and energy reduction targets.

12.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). 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).

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

Energy and carbon summary

12.6 The following summary table shows how the proposal performs against the policy targets for operational carbon reductions in non-domestic major refurbishment schemes, set out in the CPG (Energy Efficiency and Adaptation).

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): CPG	Part L2B for retained thermal elements	29.4%
Be green stage (renewables): CLP policy CC1	20%	32.8%

Total carbon reduction: CPG and LP CC1	Greatest possible on-site reduction of carbon emissions, meeting Part L2B for retained thermal elements	52.5 %
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Table 1 - Carbon saving targets (for non-domestic major refurbishments) and the scheme results

- 12.7 As demonstrated through Table 1 above, the operational carbon savings significantly exceed the non-domestic major refurbishment target values and measures to secure these level 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

- 12.8 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. The CPG (Energy Efficiency and Adaptation) specifies non-domestic refurbishments over 1,000sqm, should aim to achieve the greatest possible on-site reduction of carbon emissions, meeting Part L2B for retained thermal elements.
- 12.9 In this case, the development achieves an overall on-site reduction of 52% below Part L requirements as shown in Table 1 above, and also achieves carbon reduction at 'Be green' stage of 32.5% which significantly exceeds the major development target of 20% on-site reduction of carbon emissions.

Be lean stage (reduce energy demand)

- 12.10 The CPG (Energy Efficiency and Adaptation) sets a target Part L2B for retained thermal elements, but does not set a minimum 15% reduction through reduced energy demand at the first stage of the energy hierarchy which applies to major developments only.
- 12.11 In this case, the development meets the Part L2B for retained thermal elements target for non-domestic major refurbishments, but also meet the major development policy target of 15% in carbon reductions, reducing emissions by 29% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, efficient glazing and lighting.
- 12.12 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.
- 12.13 Active cooling is proposed and an overheating assessment has been submitted by the applicant as part of the justification for active cooling. While the development is shown to be resilient to hot weather, with only a small

number of rooms overheating, the justification for active cooling is accepted in this instance for the following reasons. The proposal relates to an existing building where it is harder to mitigate overheating, there is existing active cooling at the site, no cross ventilation would be available in rooms and the proposal is a change of use from office to hotel. Condition 16 requires measures to adapt to climate change to be implemented and overheating risk to be managed.

Be clean stage (decentralised energy supply)

- 12.14 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.
- 12.15 In this case an assessment of the existing London heat map has been made and a future connection to the district heat network (DHN) is confirmed and feasible for this development.

Be green stage (renewables)

- 12.16 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.
- 12.17 In this case, the development exceeds the policy target of 20%, reducing emissions by 32 % at this stage through renewables, in compliance with the development plan. The proposal includes PV panels, low carbon heating like ASHP and green roofs. Full details of these will be secured via conditions 5 and 25.

Climate change adaption and sustainable design

- 12.18 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.
- 12.19 Local Plan Policy CC2 point (h) expects all non-domestic developments, including refurbishments of 500sqm of floorspace or above to achieve “excellent” in BREEAM assessments. A preliminary BREEAM assessment is incorporated within the submitted Sustainability Statement, showing that all the main targets are met and exceeded 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 BREEAM 'Excellent' rating. The pre-assessment report shows that:

- Energy – 72% with the target being 60%
- Water – 66% with the target being 60%
- Materials – 71% with the target being 40%.

- 12.20 The BREEAM pre-assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.
- 12.21 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.
- 12.22 Condition 21 would secure the water usage target of 110 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.
- 12.23 Overheating is to be mitigated through the inclusion of Condition 16, as detailed within paragraph 12.13 above.
- 12.24 In this case, the development incorporates SUDS and green roofs which would enhance biodiversity of the site and reduce water runoff. Condition 8 requires further details of these to be submitted for approval.
- 12.25 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 has been submitted as part of this application which was assessed by an Air Quality Officer.
- 13.3 The site is considered air quality neutral. The air pollution at the application site is considered acceptable for the proposed hotel use, and meets the air quality objectives, London Plan and World Health Organisation standards.
- 13.4 Air quality during construction would be managed in the CMP, which is secured by Section 106 legal agreement. Condition 24 requires air quality monitoring to be undertaken and condition 17 restricts the use of non-road mobile machinery.
- 13.5 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 limited 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 landscaped terraces and green roofs have been incorporated. Conditions 5 & 6 would secure details of landscaping and green roofs.

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. LAND CONTAMINATION

- 15.1 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. As part of this, we will consider factors including contaminated land.
- 15.2 The site as historically mapped as a tobacco and snuff works and unknown industrial land use. The terraces and green roofing proposed are not considered to pose a plausible pathway for contaminants as they are at raised level and not in-situ with the underlying soils. The courtyard areas

proposed at the lower ground floor level are to be hardstanding cover with raised planters for shrubs/trees. The proposal is therefore not considered to pose unacceptable risk in terms of land contamination. Condition 18 states that works are to be ceased and a remediation plan developed if during construction/demolition works evidence of potential contamination is encountered.

16. WATER AND FLOODING

- 16.1 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 SuDs and water efficiency measures.
- 16.2 A Flood Risk & Sustainable Drainage Assessment has been submitted as part of this application.
- 16.3 The proposal includes two bedrooms at basement level, along with other uses considered to be 'sensitive' to flooding such as kitchen, laundry, plant rooms, bathrooms etc. While Policy A5 of the Local Plan does not permit habitable uses such as bedrooms and sensitive uses at basement level, in this instance the applicant has provided sufficient evidence to demonstrate that the high risk of surface water flooding identified in the Environment Agencies (EA's) risk of flooding from surface water (RoFSW) does not reflect the real risk of surface water on site. Council's Sustainability Officer agrees with the argument put forward by the applicant's flood/engineer consultant, that the high risk of flooding shown is a result of the LiDAR data, where elevation levels are dipped on site and the courtyard area. Figure 8 from the Flood Warning and Evacuation Plan (FWEP) (included as Figure 10 below) and EA's RoFSW both demonstrates that the surface water flooding risk is localised and not connected to a wider surface water flow path, and is not likely to increase adjacent surface water flood risk along the neighbouring areas as a result of the proposed development.

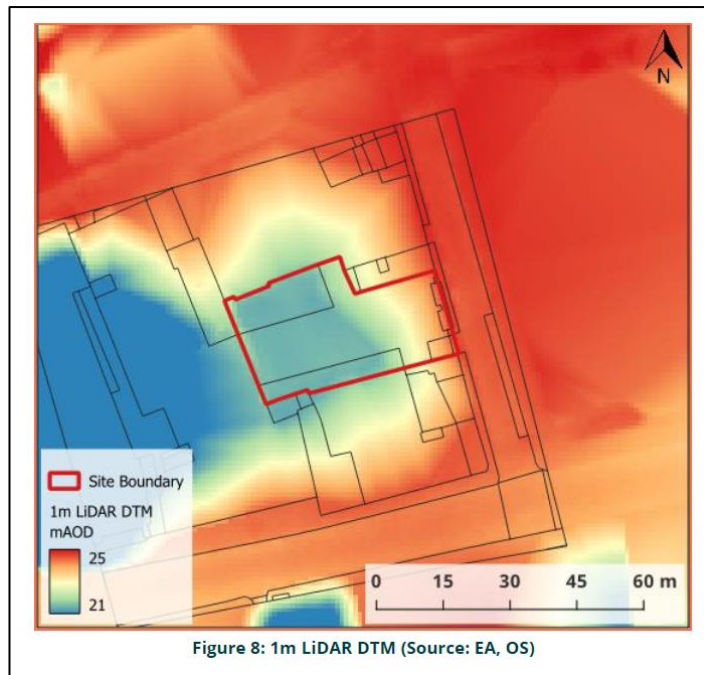


Figure 10: LIDAR DTM

- 16.4 In this instance, the proposed bedrooms and sensitive uses in the basement are considered acceptable subject to flood mitigation and protection measures, detailed as follows.
- 16.5 Proposed SuDS measures include a combined rainwater harvesting attenuation tank (33m³) and green roofs, bringing an improvement to surface water runoff, with a 50% reduction from the existing peak discharge rate. The proposed discharge rate in a 1 in 100year +40% climate change factor is 21l/s, whilst not meeting the greenfield runoff rate of 1.2l/s (1 in 100 yr) due to it qualifying as a brownfield site. The proposed rate is considered an improvement to the existing. Thames Water has confirmed that the public combined drainage system has sufficient capacity to accommodate the proposed surface water flows from the site. Condition 8 requires the applicant to submit further SuDS details.
- 16.6 The applicant has submitted a Flood Risk Emergency Plan (FREP) in line with Adept guidance. Flood protection measures include the installation of flood proof doors and windows at basement level and a non-return valve to protect the below ground drainage system from potential low risk of public sewer drainage. These details would be secured via Condition 11.
- 16.7 The FWEP also presents a list of further flood resistant design measures, some of which are considered feasible, and are recommended for the development. See condition 11.
- 16.8 The FWEP is considered adequate at this stage in terms of providing flood protection for occupants at the basement level, however Condition 11

secures a detailed Flood Risk/ Warning and Evacuation Plan (FWEP/FREP) in line with ADEPT guidance.

- 16.9 The site is located in an area with Secondary A aquifer. Therefore, if piled foundation works are required, a Foundation Works Risk Assessment will be carried out, secured via Condition 10.

17. ACCESSIBILITY

- 17.1 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.
- 17.2 Step-free access would be available via the main entrance on Red Lion Street into the building. 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.
- 17.3 Condition 20 requires the provision of 5% (6) 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.

18. FIRE SAFETY

- 18.1 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. Policy D5 of the Local Plan is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 18.2 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.

- 18.3 The application is accompanied by a "London Plan Fire Statement" document which has been prepared by OFR. It provides information on means of warning and escape, fire safety measures and access for fire service personnel and equipment. The document and its recommended measures are secured by condition 19.
- 18.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5.

19. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 19.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3m 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.
- 19.2 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.
- 19.3 As per paragraph 7.17 above, the contribution amount would be £211,735 for the loss of employment space which will be secured by Section 106 legal agreement.
- 19.4 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 will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £23.5 million, this would mean 7 construction apprentices and a £11,900 support fee.
- Construction Work Experience Placements - the applicant should provide 7 construction work placement opportunity of not less than 2 weeks, to be undertaken over the course of the development construction. This would

be recruited through the council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises 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 a week 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

- 19.5 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.
- 19.6 The applicant has agreed to the following end use/occupation phase opportunities:
- Apprenticeships: 1 end use apprenticeship on a rolling 5-year period, paid London living wage to 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.
- 19.7 The applicant has 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; and
 - 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.
- 19.8 The above measures would be included in a package of Employment and Training measures secured by s106 agreement in accordance with CLP policy E1 and the CPG.

20. REFUSE AND RECYCLING

- 20.1 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.
- 20.2 A waste storage area is proposed at lower ground floor level, with an internal route to the service lift to the collection point on Red Lion Street, via the existing kerbside loading space. Collections will occur weekly.
- 20.3 Condition 22 requires the refuse waste 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.

21. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 21.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 21.2 No new floorspace is proposed at this stage so it will not be CIL liable.

22. CONCLUSION

- 22.1 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.
- 22.2 This application meets the policy tests of Policy E2 of the Local Plan, which seeks to protect existing employment space within the borough. The 14 months of marketing evidence has demonstrated a lack of demand, and constraints posed by the existing building and quality of the existing office space contribute to this lack of interest. While the Local Plan currently requires 2 years of marketing to be undertaken the emerging Local Plan reduces the requirement to 12 months.
- 22.3 The provision of residential on-site is not appropriate in this instance given concerns surrounding standard of accommodation.
- 22.4 External works including extensions are proposed which would not impact on the significance of the conservation area or result in harm to the conservation area. The activation of the front façade would be beneficial to the streetscape character.
- 22.5 The London Plan and Local Plan support the delivery of visitor infrastructure within the CAZ, which is near many destinations and attractions.

- 22.6 The proposal will bring a vacant building back into productive use and will optimise the building's environmental performance, with a BREEAM excellent building, energy efficient, air quality neutral and resilient to climate change.
- 22.7 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.
- 22.8 Accessibility and inclusive design standards have been met, with 5% of hotel rooms designed to be wheelchair accessible.
- 22.9 The scheme involves significant contributions for transport and highways, loss of employment space and an employment and training package.
- 22.10 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.

Public benefits

- 22.11 No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weight against that harm.
- Improvements to the public realm and streetscene though active frontage on Red Lion Street;
 - Provision of jobs in the hospitality sector and construction related supplemented by an employment and training package to be secured via Section 106 legal agreement;
 - Retention and reuse of an existing building thereby reducing carbon emissions;
 - Loss of employment space contribution; and
 - Encouraging biodiversity with greening incorporated into the design.

23. RECOMMENDATION

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

Energy and sustainability

- Energy plan securing: 52% CO2 reduction, be lean stage of 29% and be green stage of 32%
- Sustainability plan (BREEAM compliance) – Secure BREEAM excellent rating (72% for energy, 71% for materials and 66% for water)
- Future proof connections to a district heat network.

Transport

- 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 hotel;
- Highways contribution of £20,000;
- Cycle/e-scooter hire improvements contribution of £10,000;
- CMP;
- CMP implementation support contribution of £30,513 and CMP impact bond of £32,000;
- Delivery and Servicing Plan;
- Pedestrian, Cycling and Environmental Improvements contribution of £70,000; and
- Construction working group.

Employment and training

- Loss of employment space contribution of £211,735
- 7 construction apprenticeships and a support contribution of £11,900
- 7 construction work placements of not less than 2 weeks
- Local recruitment (20% target)
- Local procurement
- 1 end of 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

- Hotel operational management plan

24. LEGAL COMMENTS

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

25. CONDITIONS

1	Three years from the date of this permission The development hereby permitted must be begun not later than the end of three years from the date of this permission. Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).
2	Approved drawings The development hereby permitted shall be carried out in accordance with the following approved plans: LHS-ORM-ZZ-00-DR-A-12200, Rev C01; LHS-ORM-ZZ-01-DR-A-12201, Rev C01; LHS-ORM-ZZ-02-DR-A-12202, Rev C01; LHS-ORM-ZZ03-DR-A-12203, Rev C01; LHS-ORM-ZZ-04-DR-A-12204, Rev C01; LHS-ORM-ZZ-05-DR-A-12205, Rev C01; LHS-ORM-ZZ-06-DR-A-12206, Rev C01; LHS-ORM-ZZ-07-DR-A-12207, Rev C01; LHS-ORM-ZZ-RF-DR-A-12208, Rev C01; LHS-ORM-ZZ-B1-DR-A-12299, Rev C01; LHS-ORM-ZZ-AA-DR-A-12400, Rev C01; LHS-ORM-ZZ-BB-DR-A-12401, Rev C01; LHS-ORM-ZZ-NO-DR-A-12600, Rev C01; LHS-ORM-ZZ-EA-DR-A-12601, Rev C01; LHS-ORM-ZZ-SO-DR-A-12602, Rev C01; LHS-ORM-ZZ-WE-DR-A-12603, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12701, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12702, Rev C01; LHS-ORM-ZZ-ZZ-DR-A-12703, Rev C01. Reason: For the avoidance of doubt and in the interest of proper planning.
3	Materials to match existing 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. 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.
4	Design details Prior to commencement of relevant works, detailed drawings and samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority: a) Details including plans, coloured elevations and sections at 1:20 of all new windows/ doors (including jambs, head and cill), external doors and ventilation grills,

	b) Details including plans, coloured elevations and sections at 1:20 of all screening, upstands, parapets, gates, planters and associated elements and lighting fixtures c) Manufacturer's specification details, including high resolution photographs where appropriate , of parts (a) and (b) of the-facing materials (to be submitted to the Local Planning Authority) and samples at a minimum of 0.5m x 0.5m of those materials (to be provided on site). d) Once a) and b) and c) are agreed, sample panel(s) of a typical section of the ground floor façade at 1:1 scale (including a glazed opening, showing reveal, cill and header details, the extents of the panel are to be agreed with the local planning authority ahead of construction. e) Detailed drawings, including plans, coloured elevations and sections at 1:20 of all new landscaping elements. 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. 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.
5	Green Roof details Prior to commencement of relevant works, full details in respect of the green roof in the area indicated on the approved roof plan, and a feasibility assessment illustrating the roof loading capacity (or equivalent) with the aim of incorporating a green roof system shall be submitted to and approved in writing by the local planning authority. Details of the green roof provided shall include: catchment area, storage volume, drainage rate, species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof: The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

	Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan 2017.
6	Landscape: Details to be submitted No development (excluding enabling works and demolition) shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved. Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.
7	Landscaping: To be in accordance with approved details All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or prior to the occupation for the permitted use of the development, whichever is the sooner. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation. Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3 D1 and D2 of the London Borough of Camden Local Plan 2017.
8	SuDS: Further details Prior to commencement of development, full details of the sustainable drainage system [including 33m³ rainwater-attenuation tank and 196m² green roofs] shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the greenfield run-off rate or other rate [of 21l/s] approved by the

	Local Planning Authority. An up-to-date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including: - Evidence that the hydraulic modelling has used the most up-to-date rainfall data, including FEH22 (or any subsequent updates), unless otherwise agreed in writing by the local planning authority - The proposed SuDS or drainage measures including storage capacities - The proposed surface water discharge rates or volumes - The responsible party for maintaining the SuDS systems - Details of the management of Health and Safety risks related to the SuDS design Systems shall thereafter be retained and maintained in accordance with the approved details. 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.
9	Greywater harvesting Prior to commencement of development, a feasibility assessment for greywater recycling should be submitted to the local planning authority and approved in writing. If considered feasible, details should be submitted to the local authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details. Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress 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.
10	Secondary Aquifer Foundation Works Risk Assessment a) Prior to the commencement of development (excluding demolition, preparation and site clearance), a scheme for intrusive ground investigation shall be submitted to and approved in writing by the local planning authority. The investigation shall determine the need for piling or other penetrative foundation techniques. b) Where piling or penetrative ground improvement is proposed, no such works shall take place until a Foundation Works Risk Assessment (FWRA) has been submitted to and approved in writing by the local planning authority. The FWRA shall demonstrate that risks to groundwater and archaeology are minimised shall be submitted to and approved in writing by the local planning authority.

	The Foundation Works Risk Assessment (FWRA) must have regard to current available guidance including the Environment Agency's guidance 'Piling in layered ground: risks to groundwater and archaeology', and 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' (National Groundwater and Contaminated Land Centre report NC/99/73) or any updates to guidance. Reason: To ensure that the development avoids harm to the water environment in accordance with Policy CC3 of the London Borough of Camden Local Plan 2017.
11	Flood Risk Prior to commencement of development, a detailed Flood Risk Emergency Plan should be prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance. The Flood Emergency Plan should also: • clearly define the primary evacuation route which should be safe from flooding • provide details of signage required along the main emergency egress route, if route cannot be designed to be dried • provide details of any flood warning systems or alarms to alert occupants in a timely manner • provide details of proposed flood protection measures including at the minimum flood proof doors and windows in the basement, and non-return valve. The detailed Flood Risk Emergency Plan should be submitted to the Local Planning Authority and approved in writing. Approved measures shall be provided in their entirety prior to the first occupation and permanently retained thereafter. Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan.
12	External Noise Level 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. 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
13	Anti-Vibration Isolators 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. 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.
14	Noise level in rooms The noise level in rooms at the development hereby approved shall meet the noise standard specified in BS 8233 Guidance on sound insulation and noise reduction for buildings. The approved measures shall be retained thereafter in perpetuity. Reason: To ensure that the amenities of future occupiers are protected in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.
15	Cycle parking details Prior to first occupation of the hotel rooms hereby approved, details of six long-stay and three visitor cycle parking spaces at basement level shall be submitted to and approved in writing by the local planning authority. 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. 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.
16	Overheating Prior to first occupation, details of the active cooling and overheating mitigation measures to be implemented within the development shall be submitted to and approved by the Local Planning Authority. The submitted details shall demonstrate that:

	a) cooling demand has been reduced as far as reasonably practicable through the application of the cooling hierarchy and that all feasible passive design measures have been incorporated; b) any refrigerants used in the system is of global warming potential at or lower than 675. The approved measures shall include, as a minimum, passive ventilation via opening of windows with restrictors, windows with g-value of 0.38, LED/energy efficient lighting, MVHR, and high reflectance/low transmittance internal blinds. The development shall be carried out in accordance with the approved details and the measures shall be retained thereafter. Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.
17	Non-road mobile machinery No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register). Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the London Borough of Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.
18	Contamination If during demolition or other ground disturbing works, evidence of potential contamination is encountered, works shall cease and the site fully assessed to enable an appropriate remediation plan to be developed. Works shall not recommence until an appropriate remediation scheme has been submitted to, and approved in writing by, the local planning authority and the remediation has been completed. Upon completion of the building works, this condition shall not be discharged until a closure report has been submitted to, and improved in writing by, the local planning authority. Reason: To protect occupiers of the development from the possible contamination in accordance with policies A1, C1 and CC5 of the London Borough of Camden Local Plan 2017.
19	Fire safety The development shall at all times be occupied and managed in strict

	compliance with the Fire Statement prepared by OFR Consultants, dated March 2026. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.
20	Wheelchair accessible rooms Prior to the commencement of first use of the hotel, there shall be the provision of 6 (5%) fully wheelchair accessible rooms. 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.
21	Water efficiency The development hereby approved shall achieve a maximum internal water use of 110 litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with. 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.
22	Waste and recycling storage to be implemented The refuse storage area shown on approved plan 12299, Revision C01 shall be provided prior to the commencement of the use hereby permitted, and shall thereafter be retained for the duration of the development. 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.
23	Solar PV Prior to first occupation of the hotel, drawings and data sheets showing the location, extent (no.20 panels) and predicted energy generation capacity (at least 8kWp) 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 roof access

	arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter. 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.
24	Air Quality Monitoring No demolition or development shall commence until all the following have been complied with: a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number (at least 2) and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance; b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing. The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing. Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the London Borough of Camden Local Plan 2017 and policy SI1 of the London Plan.

26. INFORMATIVES

1	Your attention is drawn to the fact that there is a separate legal agreement with
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	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.
2	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).
3	Biodiversity Net Gain (BNG) Informative (1/3): 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: (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". - 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). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
5	Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat: 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. + The effect of section 73(2D) of the Town & Country Planning Act 1990 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. + Phased development 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.
6	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 & 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.
7	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 www.camden.gov.uk) 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) 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.
8	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 http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en .
9	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 https://beta.camden.gov.uk/web/guest/construction-management-plans 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.
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, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk .
12	Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
13	Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.
14	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 trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.
15	Management of surface water from new developments should follow guidance under sections 167, 168 & 169 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design
16	There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes
17	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 thameswater.co.uk/buildingwater.
18	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.
19	Thames Water should be consulted with in relation to the existing 150mm diameter combined connection to the public sewer network that is proposed to be descaled, lined and reused.