

Address:	8-12 Camden High Street London NW1 0JH		2
Application Number(s):	2025/3852/P	Officer: Brendan Versluys	
Ward:	Regents Park		
Date Received:	03/09/2025		
Proposal:	Change of use of ground (part) and first to fifth floors from commercial use (Class E) to hotel use (Class C1), new roof terrace and erection of associated balustrade and pergola to first floor roof, alterations to and refurbishment of front and rear elevations, installation of PV panels to main roof.		
Background Papers, Supporting Documents and Drawing Numbers: Existing Drawings: P-001; P-002; P-003; P-005; P-007; P-009; P-011; P-013; P-015; P-017; P-019; P-021 Proposed Drawings: P-004; P-006; P-008; P-010; P-012; P-014; P-016, rev A; P-018, rev B; P-020; P-022; P-023; P-024, rev B Documents: Cover letter prepared by Montagu Evans, 29/08/2025, ref. JOB001691/GF/GB; Planning & Heritage Statement prepared by Montagu Evans, 29/08/2025; Design and Access Statement prepared by Douglas Wallace, 8/07/2025; Marketing Report prepared by Robert Irving Burns, July 2025 Construction Environmental Management Plan prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-990001, rev P02; BNG Statement prepared by Arbtech, 16/06/2025; Sustainability Statement prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-V-790001, rev P02; Noise Impact Assessment prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-O-500001, rev P02; Air Quality Assessment prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-940001, rev P02; Transport Assessment prepared by Hilson Moran, 13/01/2026, ref. 37207-HML-XX-XX-RP-H-780001, rev P04; Active Travel Zone Assessment prepared by SK Transport Planning, 13/05/2026, ref. SK22634-ATZ01, rev 02; Flood Risk Assessment and SuDS Strategy prepared by Hilson Moran, 30/01/2026, ref. 37207-HML-XX-XX-RP-U-870002, rev P03; Health Impact Assessment prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-900001, rev P02; Preliminary Ecological Appraisal & Preliminary Roost Assessment prepared by Arbtech Consulting Ltd, 21/05/2025; Flood Warning and Evacuation Plan prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-870001, rev P02; Indoor Air Quality Plan prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-940002, rev P02; Operational Waste Management Strategy prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-U-950001, rev P02; Thermal Comfort Analysis prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-V-800002, rev P02; BREEAM RFO 2014 Pre-Assessment Report prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-V-960001, rev P02; Fire Safety Planning Statement prepared by B-First Fire Safety, 29/08/2025, rev 02; Energy Strategy prepared by Hilson Moran, 7/08/2025, ref. 37207-HML-XX-XX-RP-V-800001, rev P02; Air Quality Note prepared by Hilson Moran, 6/02/2026, ref. 37207-HML-XX-XX-RP-U-940001; Illustrative Drainage Strategy prepared by Hilson Moran, 15/12/2025, ref. 37207-HML-XX-XX-RP-U-870002			

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

Applicant:	Agent:
c/o Agent	Montagu Evans 70 St Mary Axe London EC3A 8BE United Kingdom

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E(c)	Offices	1,462	-	- 1,462
C1	Hotel	-	1,462	+ 1,462
Total	All uses	1,462	1,462	-

Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Cycle parking (non-residential)	0	8	-	+ 8

EXECUTIVE SUMMARY

- i) The application relates to a six-storey office building on the eastern side of Camden High Street, in Camden Town town centre and in proximity to Mornington Crescent station. The building is occupied by two retail units at ground floor, with offices being located on the upper five floors. The building is located in the Camden Town Conservation Area, but dates from the 1980s.
- ii) The proposal is a change of use of the building from office and retail (Class E) to hotel (Class C1). The façade and rear elevation would be upgraded and refurbished as part of the works, including replacement windows and replacement metal panels. New PV panels would be installed on the main roof, and the flat first floor roof to the front would be converted to a roof terrace with a new balustrade and pergola installed.

- iii) While the proposal would result in the loss of an employment use, the proposed change of use to hotel (Class C1) is considered acceptable in this instance and in compliance with the development plan taking account of the specific circumstance of this case. This application is supported by two-plus years of marketing evidence, which demonstrates a lack of demand for the Class E office space. The fundamental changes within the occupier market, increasing vacancy rates of the office space within this area and the constraints posed by the existing building demonstrate why the site is not suitable for continued office use.
- iv) The building would be retained in an active employment generating use, with a loss of employment space contribution and training package to be secured by Section 106 agreement.
- v) The proposed 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 in a vibrant town centre.
- vi) The proposed hotel is in proximity to Koko music venue, however guests of the hotel would not be adversely affected by entertainment noise with the proposed installation of sound insulation measures.
- vii) External works would improve the condition and appearance of the building and would not harm the character or appearance of the Camden Town Conservation Area.
- viii) The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee: Non-residential development involving the change of use of more than 1000sqm of non-residential floorspace [Clause 3(ii)].

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Camden Town
Conservation Area	Camden Town Conservation Area
PTAL (Public transport accessibility)	6a
Underground development constraints and considerations	- Contaminated Sites Potential - Article 4 Basements - Article 4 Land Use - Slope stability - TfL zone of interest (tunnel asset)

Table 1 - Site designations and constraints

Description

- 1.2 The subject building is a six-storey office building located on the eastern side of Camden High Street.
- 1.3 The building provides two ground floor retail units, with five levels of refurbished office space above. The second floor was refurbished internally in 2023. The fifth, top floor is a later addition and is set back at the front and rear elevations. The offices have been vacant for at least three years.
- 1.4 The main access to the building is from Camden High Street, with the service entrance to the rear accessed from Bayham Place, which in turns connects to Bayham Street.
- 1.5 The building is adjoined by mid-rise buildings on either side, with the adjoining terrace to the north being historic buildings and to the south a more modern building.
- 1.6 There is a large yard to the rear of the site, partly occupied by servicing equipment with the remaining space being used for car parking.
- 1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 6a (Excellent), and is close to Mornington Crescent Station, as well as bus

services on Camden High Street and Eversholt Street, which connect to Camden Town and Euston Stations and on to Central London.

2. THE PROPOSAL

- 2.1 The proposal is for the conversion of the first to fifth floors of the building, currently in office use (Class E), to a 57 x room hotel (Class C1). The existing central ground floor corridor (with access to the upper floors of the building) would be the main access point for the hotel. Servicing of the hotel would take place from the rear of the building via Bayham Place. The existing ground floor retail units would be unaffected.
- 2.2 The hotel reception would be located at the first floor. 5 x accessible rooms would be provided.
- 2.3 The existing metal cladding to the front elevation would be removed and replaced with new 'Grey Brown' facade panels, as an open ventilated façade construction system. New ventilation grilles would be installed on the brickwork of both the front and rear elevations to service the hotel rooms.
- 2.4 All existing glazing to the front and rear elevations at the upper floors would be removed and replaced with new triple glazed aluminium framed curtain walling glazing, with grille header panels, and new double glazed low iron curtain walling glazing system to the fifth floor only.
- 2.5 Some of the existing glazing would be replaced with blank infill panels, to facilitate the new internal hotel room layout.
- 2.6 A new terrace would be formed over the existing front flat roof at first floor, and would include a pergola, planting and new railings.
- 2.7 At the fifth floor, the existing terrace to the front and rear would be refurbished and a replacement railing installed, along with new planting.
- 2.8 The existing rear external fire escape stairs would be retained and refurbished.
- 2.9 Solar PV panels would be installed on the roof.
- 2.10 New plant would be installed internally at the first floor.
- 2.11 New cycle parking would be provided in the rear service yard.
- 2.12 Servicing of the hotel would take place from the rear of the building, via Bayham Place, in line with the existing servicing arrangements for the offices.

3. RELEVANT HISTORY

The site

- 3.1 **2024/5397/PRE** - Change of use of the first to fifth floors and part change of use of ground floor from office (Class E) to hotel (Class C3) with 57 x hotel rooms, alterations to the front elevation. **Pre-application advice issued 6/02/2024**
- 3.2 **2023/5097/PRE** - Proposed change of use of floors 3 and 4 from office use (Class E) to residential use (Class C3) to provide for 4 x one bedroom and 4 x two bedroom dwellings, associated external alterations to the front and rear elevations, enclosing the open rear escape stair and creating a new pedestrian entrance to Bayham Street at the rear elevation, relocating existing plant to roof level. **Pre-application advice issued 28/03/2024**

The area

- 3.3 2-6 Camden High Street:
- 3.4 **2025/3490/P** - Erection of a two storey roof extension and part two part five storey rear extension to provide additional office accommodation, installation of plant to the roof of the rear part two storey extension. **Pending application.**
- 3.5 **2024/2512/P** – Erection of rear extension from ground to third floor levels and erection of roof extension at fourth and fifth floor levels to provide additional office floor space (Class E) and five residential flats (Class C3). Associated works including the installation of air source heat pumps at roof level and creation of roof terraces and balconies at upper levels to front and rear. **Pending application, but officers minded to refuse due to concerns about residential accommodation immediately adjacent to Koko.**
- 3.6 **2021/6125/P** - 4th and 5th floor roof extension to replace existing 4th floor plant room; rear extension from ground to 5th floor to provide additional office accommodation; installation of 5x air conditioning units at third floor. **Granted Subject to a Section 106 Legal Agreement 06/10/2022.**
- 3.7 **2019/1098/P** – Erection of rear extension from ground to third floor levels, and erection of roof extension at fourth and fifth floor levels to create 777sqm (Use Class B1) office space; Reconfiguration of front office entrance; Installation of 5 x air conditioning units at third floor level. **Granted Subject to a Section 106 Legal Agreement 07/10/2019**
- 3.8 7A, B and C Bayham Street
- 3.9 **2023/3709/P** - Commencement of development in accordance with condition 1 of planning permission reference 2018/3647/P dated 28 August 2020, as

amended by 2020/5647/P dated 19 January 2022 for variation of conditions 2 (approved plans), 5 (waste storage), 9 (SUDs), 14 (green roofs and living walls), 24 (bird and bat boxes) and removal of conditions 11 (CHP), 12 (CHP stack) and 16 (greywater recycling) of planning permission 2018/3647/P dated 28/08/2020 (Demolition of existing office buildings (B1) and erection of 5 storey (plus two storey basement) building comprising mixed office (B1) and hotel (C1) use). **Granted 11/10/2023**

- 3.10 **2020/5647/P** - Variation of conditions 2 (approved plans), 5 (waste storage), 9 (SUDs), 14 (green roofs and living walls), 24 (bird and bat boxes) and removal of conditions 11 (CHP), 12 (CHP stack) and 16 (greywater recycling) of planning permission 2018/3647/P dated 28/08/2020 (Demolition of existing office buildings (B1) and erection of 5 storey (plus two storey basement) building comprising mixed office (B1) and hotel (C1) use). **Granted Subject to a Section 106 Legal Agreement 19/01/2022**
- 3.11 **2018/3647/P** - Demolition of existing office buildings (B1) and erection of 5 storey (plus two storey basement) building comprising mixed office (B1) and hotel (C1) use. **Granted Subject to a Section 106 Legal Agreement 28/08/2020**

CONSULTATION

Statutory consultees

Lead Local Flood Authority (LLFA - Camden)

- 3.12 No objection subject to conditions in relation to blue roof, Sustainable Urban Drainage Systems, and flood resilience measures.

Officer response: *The requested conditions are attached.*

TfL (Infrastructure)

- 3.13 No objection in principle, providing there is no detrimental effect on tunnels and structures, subject to conditions and informatives.

Officer response: *The requested conditions requiring TfL infrastructure protection and the informatives are attached.*

Thames Water

- 3.14 No objection subject to a series of informatives.

Officer response: *The requested informatives are attached.*

Local groups

Camden Town Conservation Area Advisory Committee

- 3.15 No comments.

Adjoining occupiers

- 3.16 Three sites notice were displayed, one on Camden High Street, one on Bayham Street and one on Bayham Place. The notices were displayed on 12/09/2025 until 06/10/2025 and the application was advertised in the local paper on 18/09/2025 (expiring 12/10/2025).
- 3.17 One objection was received from a local household and one objection was received from Bidwells (a real estate firm) on behalf of Koko, a nearby music and entertainment venue at 1A Camden High Street. The objections received by the Council are on the Council's website. The key issues raised are.

Noise impacts to nearby residents

- The proposed roof terrace would not be suitable in the context of surrounding residential uses. Koko's roof terrace already causes noise issues.

Officer response:

- *A condition (condition 24) will be attached limiting the use of the terrace areas to daytime and early evening hours so that it does not exacerbate or be adversely affected by Koko's peak night-time useage.*

Noise impacts to Koko / The Piano Factory

- The submitted planning application fails to assess the impact of Koko's activities on prospective hotel guests, which is contrary to the Agent of Change principle. If hotel guests later experience disturbance from Koko, this will likely result in noise complaints and pressure for licence restrictions, placing the continued operation of the venue at risk.
- The proposed roof terrace would be exposed to high ambient noise levels from nearby venues and may itself become a source of late-night disturbance. No clear management plan, operating hours, or acoustic design details have been submitted. Given its close proximity to Koko, the terrace should be omitted or subject to strict operational controls to prevent conflict between uses.

Officer response:

- *The applicant's Acoustic Report considered a worst-case scenario for noise from Koko and included indicative noise ingress calculations, which demonstrate that appropriate design measures, such as replacement glazing, can be implemented to ensure noise levels remain within acceptable limits. With the implementation of appropriate sound insulation, the proposed change of use is not considered to prejudice Koko's operations.*

- *It should also be noted that the building at 8-12 Camden High Street has no party wall with Koko and is separated by another building 2-6 Camden High Street. Condition 19 secures details of sound insulation.*
- *The proposed use is as a hotel (Use Class C1) and not as permanent residential (Use Class C3), it is therefore not considered to be as noise sensitive. Hotel users are likely to have a lower sensitivity than residential use due to the typical short length of stays.*
- *A condition will be attached limiting the use of the terrace areas to daytime and evening hours so that it does not exacerbate or be adversely affected by Koko's peak night-time useage.*

Heritage impacts to Koko

- The site sits within the Camden Town Conservation Area and immediately adjoins Koko's Grade II listed building. The NPPF (2024) emphasises that heritage settings and cultural landmarks should be protected and enhanced. Any change of use that risks undermining the operation of an established cultural institution such as Koko runs contrary to these principles and to the borough's broader cultural and economic objectives.

Officer response:

- *The proposed alterations are designed to be in character with the architecture of the existing building. The proposals also do not increase the bulk or mass of the existing building. These factors combined with the separation distance of the application site from listed buildings, means nearby heritage assets are not adversely impacted from the proposed works.*
- *Design and heritage impacts are assessed under section 7 of this report.*

4. POLICY

National and regional policy and guidance

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

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

[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](#)

[GG6 Increasing efficiency and resilience](#)

[SD6 Town centres and high streets](#)
[SD7 Town centres: development principles and Development Plan Documents](#)
[SD8 Town centre network](#)
[D1 London's form, character and capacity for growth](#)
[D3 Optimising site capacity through the design-led approach](#)
[D4 Delivering good design](#)
[D5 Inclusive design](#)
[D8 Public realm](#)
[D11 Safety, security and resilience to emergency](#)
[D12 Fire safety](#)
[D13 Agent of Change](#)
[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 5 Water infrastructure](#)
[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](#)
[Planning for Equality and Diversity in London SPG](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)S

[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 TC4 Town centre uses](#)

[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](#)

[Community uses, leisure and pubs - January 2021](#)

[Design - January 2021](#)

[Developer Contribution CPG - March 2019](#)

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

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

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

[Town centres and retail - January 2021](#)

[Transport - January 2021](#)

[Water and flooding CPG - March 2019](#)

Other guidance:

[Camden Town Conservation Area appraisal and management plan \(2007\)](#)

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.

5. ASSESSMENT

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

6	Land use
7	Design and Heritage
8	Impact on Neighbouring Amenity
9	Sustainability and Energy
10	Trees, Greening and Biodiversity
11	Water and Flooding
12	Air Quality
13	Safety and security
14	Accessibility
15	Fire safety
16	Transport
17	Refuse and Recycling
18	Employment and Training Opportunities
19	Community Infrastructure Levy (CIL)

6. LAND USE

Loss of office use

- 6.1 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.
- 6.2 The application is supported by a Marketing Report prepared by Robert Irving Burns. The report provides a summary of the marketing undertaken and demonstrates the unsuitability of the existing building as an office in its existing condition and in the context of the current central London office market.
- 6.3 The office accommodation has been marketed since mid-2021, on the basis of securing either a single tenant or multiple tenants. The submitted marketing evidence is generally acceptable and meets the marketing criteria of the CPG Employment sites and business premises (2021), including the minimum two-year marketing period.
- 6.4 The existing building's present specification and configuration sit significantly below what is now characterised as Grade A office space in the central London market. The existing floorspace does not provide the type of, or flexibility in, accommodation, facilities or the sustainability credentials occupiers now expect, and which are on offer elsewhere. Despite a part of the office accommodation having been refurbished in 2023, the refurbishment was not to Grade A specification and the applicant has cited the lack of arrival facilities as likely being a key factor in the difficulty of letting the premises, together with the quality of the office accommodation not being at the highest end of the market (where there is the highest demand for office accommodation) and the general surplus of office stock in Camden Town.
- 6.5 The Marketing Report cites the capital investment required to meet modern standards creates a substantial barrier for the continued use of the building as office use. Given the systematic misalignment with tenant demand and regulatory requirements, a light or incremental refurbishment is not considered to resolve the deficiencies with the building, which include the lack of arrival facilities and other amenities such as cycle racks and shower facilities, and cannot be feasibility accommodated in the building envelope

and are deficiencies inherent to the building design. The building lacks the core potential for cost-effective upgrade within the office sector. Continued office use of the existing building would require considerable expenditure in order to modernise the building and bring it in line with latest requirements, and this is not financially viable to achieve without a tenant(s) being secured to occupy the offices. The marketing exercise attracted interest in the form of 25 enquires, but none of these enquiries proceeded beyond viewings of the offices.

6.6 The fundamental changes within the occupier market, increasing vacancy rates of the office space within Camden Town and the constraints posed by the existing building as described above demonstrate why the site is not suitable for continued office use.

6.7 While the site is in a suitable location for business use, being located in Camden Town town centre, with excellent public transport and convenient access to a range of amenities, the marketing exercise undertaken, and lack of any uptake of the property from a prospective tenant, it has been demonstrated that the existing premises are not realistically suitable for continued office use, in all likelihood they would remain vacant. The proposed change of use to a hotel would retain an employment element at the site given the various jobs involved with the operation of a hotel, albeit this would be at a lower job density to the existing office use, which is welcomed.

Compensation for loss of employment space

6.8 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. This 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.

6.9 The calculation below is set out in paragraph 60 of the Employment Sites and Business Premises CPG which calculates the amount of jobs based on floor area however as the submission has already calculated the existing full time jobs on site, these figures are accepted.

- FT jobs expected in employment use: $1,462 / 12 = 122$ FT jobs.
- Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use): $122 - 50 = 71$ FT jobs.

- Full time jobs lost $71 \times 21\% = 14$ [% of residents who work in Camden]
 $14 \times \text{£}3,995$ [cost to provide training per employee] = $\text{£}55,930.00$
- 6.10 The contribution amount ($\text{£}55,930.00$) for the loss of employment space will be secured by Section 106 legal agreement.

Preferred residential use

- 6.11 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.
- 6.12 The existing office floor plates are likely suitable to be converted to residential use, as has been demonstrated under a pre-application scheme (ref. 2023/5097/PRE) to convert the first to fifth floors to residential use. However the site's location fronting a busy road and in an area with a number of music venues and pubs generating noise, presents challenges in providing adequate acoustic insulation within the building fabric to ensure future occupiers would be provided with adequate on-site amenity. Notwithstanding any constraints in converting the existing offices to residential use, the submitted proposal must be considered on its own merits and the site is well suited to accommodating a hotel, as discussed under the 'Proposed hotel use' section below, and there are Employment and Training benefits associated with the proposals to change the offices to a hotel (see section 18 Employment and Training Opportunities).

Proposed hotel use

- 6.13 The proposed hotel will provide 57 rooms from first to fifth floors, representing a small-medium scale hotel. The hotel would include a lobby at first floor but no other ancillary facilities.
- 6.14 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.

- 6.15 In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the importance 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 exceeding 1,000sqm are expected to be located in Central London. This can include serviced apartments that offer hotel-like amenities and services, but with more space and privacy like a traditional apartment. Smaller visitor accommodation should be directed to Town Centres.
- 6.16 Policy TC3 sets out the Council's position on the mix and balance of uses within Camden's centres and refers to hotels as being an example of an appropriate town centre use. 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.
- 6.17 With regards to f), the site has a PTAL rating of 6a, which is the highest PTAL rating possible reflecting how easily it is reached by public transport. As well as this, a Hotel Operational Management Plan, would be secured via section 106 agreement to ensure residential amenity in the area is protected. The character of the area is that of a mix of uses, with residential, retail, public houses, offices and cafés/restaurants all within close proximity to the site. The proposal includes sufficient mitigation measures in terms of amenity of those living nearby and this is discussed fully in the amenity section (section 9) of the report. In relation to point i) there would be no loss of permanent residential accommodation as none is contained on the site presently. In terms of the set down and drop off (g) this will be discussed in the transport section below. It is therefore considered the proposals would accord with the wider aims and objectives of Policy E3 and would be a suitable location for a hotel use.
- 6.18 In terms of the proposed hotel it will have a GIA of 1,462sqm and provide 57 bedrooms. While the hotel's GIA area would have a floor area about a third larger than the 1,000sqm maximum expected by policy E3 outside of central London, the hotel provides a relatively small offering with only 57 rooms, and would be situated in a major and very well connected Town Centre. It is also noted Draft Plan policy IE5 (B) is proposing to change the threshold for new, large-scale hotels and visitor accommodation to 2500sqm to be located in

Central London (current Local Plan is hotels exceeding 1,000sqm), with smaller and medium sized hotels, such as the proposed hotel, directed to Town Centres like this one.

- 6.19 Additionally, the proposed hotel would be comparable in scale to other hotels along the wider stretch of Camden High Street and within the town centre (including the hub by Premier Inn at 115-119 Camden High Street)
- 6.20 As such, while the proposed hotel would be slightly larger than a new hotel envisaged in this Town Centre under the current Local Plan, given the characteristics of the hotel proposed, its well-connected location and the direction of relevant policy under the Draft Local Plan, the size/offering of the proposed hotel is considered acceptable.
- 6.21 A new hotel at this location would bring significant benefits in terms of attracting footfall, supporting local businesses in the service sector, and maintaining a level of vibrancy, particularly outside of daytime hours.
- 6.22 The proposed use would also bring new jobs to the area with an employment and training benefits package secured as explained in section 18. Overall, the provision of hotel use at the site is acceptable.

7. DESIGN AND HERITAGE

- 7.1 The NPPF and development plan seeks to achieve the highest standard of design in all developments. CLP policy D1 requires development to be of the highest architectural and urban design quality. CLP policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and locally listed buildings.

Layout

- 7.2 The hotel is laid out for guests to utilise the building's existing publicly accessible ground floor access from Camden High Street, with the reception/lobby being located at first floor and hotel bedrooms being located at first floor to fourth floors. The existing service yard to the rear of the building would be retained and servicing would take place from the existing ground floor rear entrance.
- 7.3 The existing ground floor entrance is centrally located to the ground floor frontage and includes a double set of glazed doors, as such the hotel entrance would be clearly legible to hotel guests.
- 7.4 The hotel, including the lift/stair core and ground floor access to Camden High Street, are accessible for a range of occupiers, including those with wheelchairs or pushchairs.

- 7.5 Both the hotel and separate restaurant entrances are accessible for a range of occupiers, including those with wheelchairs or pushchairs, ensuring an inclusive and active town centre environment.
- 7.6 As discussed, refuse storage and cycle parking is located to the rear of the building, accessed at the end of Bayham Street (a cul-de-sac) and is not visible from Camden High Street or any main roads.
- 7.7 Overall, the layout of the various uses on the site is effective and rational in accordance with policy D1.

Detailed design

- 7.8 The Council requires that development comprises details and materials that are of high quality and complement the local character in accordance with Policy D1.
- 7.9 The application site is located at the southern end of Camden High Street. The buildings in the immediate area reflect the diverse and changing architectural styles over the last two hundred years. Terraces of flat fronted early to mid 19th century houses now fronted by shops, mid Victorian stucco terraces, Victorian Gothic buildings, late Victorian and Edwardian red brick parades four and five storeys high with decorative gables, imposing banks, places of entertainment and public houses occupying key focal sites, and 20th century buildings all contribute to the wide ranging variety of architectural styles.
- 7.10 The front and rear elevations of the building would be upgraded and refurbished. Specifically, the existing metal cladding to the front elevation would be removed and replaced with new 'Grey Brown' facade panels, as an open ventilated façade construction system. New ventilation grilles would be installed on the brickwork of both the front and rear elevations to service the hotel rooms.
- 7.11 All existing glazing to the front and rear elevations at the upper floors would be removed and replaced with new triple glazed aluminium framed curtain walling glazing, with grille header panels, and new double glazed low iron curtain walling glazing system to the fifth floor only.
- 7.12 Some of the existing glazing would be replaced with blank infill panels, to facilitate the new internal hotel room layout. Existing brickwork to front and rear elevations would be retained, repaired and cleaned.
- 7.13 A new terrace would be formed over the existing front flat roof at first floor, and would include a pergola, planting and new metal railing.
- 7.14 At the fifth floor, the existing terrace to the front and rear would be refurbished and a replacement railing installed, along with new planting.

- 7.15 The existing rear external fire escape stairs would be retained and refurbished.



Figure 1: Before and after perspective images of the application site as viewed from Camden High Street.

- 7.16 The proposed upgrade and refurbishment works to the front and rear elevations would retain the existing fenestration. In particular, the existing central glazed element to the front elevation, which assists in breaking down the mass of the building as viewed from Camden High Street, would be unaltered. Similarly, the existing brick, which is a key element in ensuring the building goes some way in integrating in other existing buildings on this stretch of Camden High Street, would remain in-situ with some minor alterations through the addition of small ventilation grilles.
- 7.17 The proposed replacement 'Grey Brown' metal panels would remain distinct to but be a similar visual match to the existing brick, reducing the amount of contrasting elements on the front elevation.
- 7.18 The addition of the glass balustrades at first and fifth floors are minor elements and would complement the post-war architecture of the building.
- 7.19 The pergola would occupy a small part of the first floor roof terrace and be setback from the edge to Camden High Street, and as such would not be a dominant feature to the façade or the streetscape.
- 7.20 All the proposed materials are high quality and provide a considered response to those found locally. A condition is recommended requiring detailed drawings or samples where required of all windows, doors, facing materials, railings, balustrades and decorative features to be submitted, ensuring quality of the final build (condition 9).

- 7.21 Overall, the proposed development respects and responds to the local context and streetscape, providing a well-designed building in accordance with CLP policy D1 and D2.

Impact on heritage assets in the area

- 7.22 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.
- 7.23 The site is located in the Camden Town Conservation Area, which is a designated heritage asset and is shown in light cream in the image below. The Camden Town Conservation Area Appraisal and Management Strategy (2007) describes the building as a negative building which detracts from the character or appearance of the Conservation Area and could suitably be redeveloped.
- 7.24 The site is not in the setting of any listed buildings but is near to a Grade II listed building (Camden Palace Theatre, 1A Camden High Street) and statue (Statue of Richard Cobden), outlined in dark blue, which are designated heritage assets.

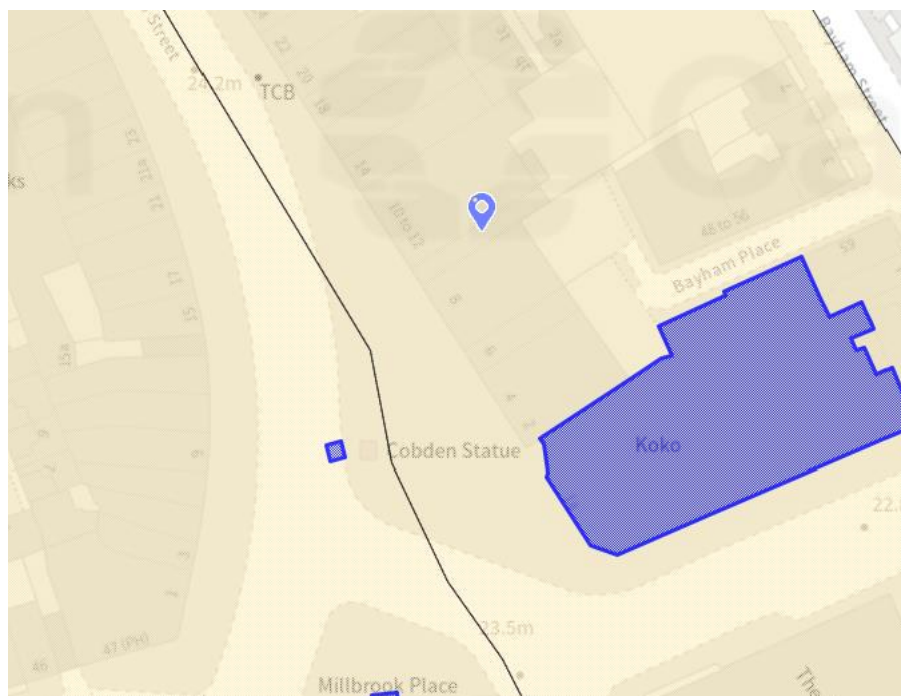


Figure 4 - Heritage assets in the area

- 7.25 There are some other listed buildings slightly further away, but their settings, insofar as they contribute to any significance, are not impacted by the proposal on the site.

- 7.26 As discussed above, the existing façade is the key visible element of the building, which contributes negatively to the character and appearance of the conservation area, and this would be upgraded and refurbished. Generally, the building has little to no merit in terms of townscape or heritage. Therefore the principle of altering the front and rear elevations as part of a refurbishment and upgrade package of works is acceptable, and the following assesses the impact of this redevelopment on nearby heritage assets.

Camden Town Conservation Area (CA) – no harm

- 7.27 Camden High Street, running roughly north-south down the centre of the Conservation Area, is architecturally diverse, with a lively mix of 19th and 20th century buildings. The skyline boasts a greater variety of roof forms and chimneystacks. There is a broad range of building materials, with a prevalence of brick, but including natural stone, stucco, polychromatic brickwork, concrete and instances of glazed tiles and faience.
- 7.28 The businesses at the southern end of the High Street have seen some economic decline over the last thirty years or so. As a result, in the southern part a small number of properties are empty, and several (including the application site) are not occupied on their upper floors.
- 7.29 The significance of the conservation area stems from the busy and wide high street leading to side streets of a tighter urban grain. The diverse and changing architectural styles, and variation in building heights, scale and massing, all contribute to the significance.
- 7.30 The proposals do not involve any change or amendment to the massing of the building. No additional floorspace is proposed. The existing building fabric and structure is being retained and upgraded to provide for a modern hotel use, whilst minimising impact on the conservation area. As discussed under ‘Detailed design’ the proposed alterations are sympathetic to and integrate appropriately with the existing building and reduce the number of contrasting elements to the front elevation at the upper floors. Key character contributing elements of the existing building, including the brick and the central curtain wall glazing, would be retained.
- 7.31 As such, the scale and design of the proposals mean the works result in no impact on the Conservation Area, preserving its significance.

Grade II listed buildings (Camden Palace Theatre, and Statue of Richard Cobden) – no harm

- 7.32 The listed building to the southeast (Camden Palace Theatre) forms part of the parade of buildings on this part of the eastern side of Camden High Street, and the listed statue (Statue of Richard Cobden) already sits in the

foreground of the application site. The significance of Camden Palace Theatre lies in its grand Victorian design and cultural influence as a key entertainment and music venue since the early 20th century. The significance of the listed statue is primarily its architectural craftsmanship and historic association. The proposal would not impact the settings of these listed buildings given they do not alter the mass of the building and instead generally upgrade and refurbish the building's front elevation, with the addition of minor elements such as balustrades and a pergola, which as discussed above integrate appropriately with the architecture of the existing building.

- 7.33 Overall, the proposal preserves the significance of designated and non-designated heritage assets in the area, in accordance with the NPPF and CLP policy D2.

8. IMPACT ON NEIGHBOURING AMENITY

- 8.1 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.

- 8.2 The Amenity CPG, and the BRE Guidelines focus on impacts to residential properties with protection of their amenity being given greater weight. Paragraph 3.7 of the CPG states:

"Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report."

- 8.3 In this case, there are two buildings containing residential accommodation in proximity to the site, including:

- 14-16 Camden High Street; and
- 48-56 Bayham Place.

- 8.4 An assessment of these properties was therefore undertaken.

Daylight and sunlight, outlook and sense of enclosure

- 8.5 Given the nature of proposed works, which do not involve any extensions (with the exception of the lift overrun) the proposal would not reduce the level of daylight or sunlight to surrounding properties or result in an increased sense of enclosure.

Overlooking and visual privacy

- 8.6 Camden Planning Guidance (Amenity, January 2021) provides detailed advice on the protection of privacy and outlook, supporting Camden Local Plan Policy A1 – Managing the Impact of Development. The guidance emphasises that developments should be designed to protect the privacy of both existing and proposed dwellings, and that mitigation measures should be incorporated where necessary to reduce overlooking. Paragraph 2.4 recommends a minimum separation distance of 18 metres between directly facing habitable room windows, unless the historic character of the area dictates otherwise.
- 8.7 While compliance with the CPG Amenity recommended minimum separation distance of 18 metres between the proposed building and directly facing habitable room windows, the south-eastern half of the hotel (comprising 11 hotel guest rooms) would be accommodated in an existing building which is separated approximately 14 metres from the south-west facing windows of the flats at 48-56 Bayham Place. The relationship between the existing windows and neighbouring amenity space is already established. The proposals do not include any new openings. As such, given the existing context and nature of the proposals, which would only provide for a minor increase in the intensity of the use of the existing building (namely, the hotel rooms would be used on weekends and in the later evening) and the overlooking relating to only a modest proportion of the hotel guest rooms proposed (11 out of 57 of the hotel guest rooms) the change of use of the upper floors of the building from offices to visitor accommodation, would not materially increase the intensity of overlooking to adjacent residential properties compared to the existing situation. The proposed hotel rooms would not overlook any other adjacent residential properties. The roof terraces are to the front of the site with views over Camden High Street and are not oriented to allow for direct views into any other adjoining or adjacent residential property.

Noise and vibration

- 8.8 A noise assessment has been submitted by the applicant as part of the application submission. Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 “Methods for rating and assessing industrial and commercial sound”.
- 8.9 There is an existing level of noise and disturbance in this busy Town Centre and on a busy road, and the introduction of the new hotel use is not expected to contribute significantly towards this.

- 8.10 A Hotel Operational Management Plan would be secured by s106 agreement, which would include a code of conduct to be made available to neighbouring residents, setting out the standards by which the hotel guests and staff are expected to conduct themselves both within the hotel and the local area with a view to promote awareness of the need to ensure that both customer and staff behaviour both in and around the hotel causes minimum impact on or disruption to local residents (including signage/information to promote customer and staff awareness).
- 8.11 The proposals include the installation of plant within the first floor of the building. This means the plant can be enclosed inside the building, albeit with high level louvres on the rear elevation, mitigating any noise and vibration from the plant.
- 8.12 The plant noise criteria have been adequately predicted, taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 8.13 The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest and potentially most affected noise sensitive receptors, subject to compliance with the requirements of conditions 20 and 21.
- 8.14 Local residents have expressed concern about the possible late night use of the terraces adding to the exceptional night time activity levels already existing in this area due to Koko. At the same time Koko has expressed concern at the external noise levels from its own roof terrace having a disruptive impact on any quiet use of the proposed hotel's terraces if occupied after a certain time of the night. It is possible that the night time atmosphere due to Koko might encourage less orderly behaviour on the hotel's terraces than may otherwise exist in a quieter more residential location. Therefore the applicant has agreed to a condition (condition 24) limit the use of its terraces between the hours of 8am to 9pm.
- 8.15 With regard to noise transfer from Koko entertainment venue (1A Camden High Street), Council's Environmental Health Officer has reviewed the submitted Acoustic report and considers noise from Koko has been assessed to ensure noise from the venue does not impact on the proposed hotel which may give rise to complaints about noise. In line with recommendations from the Environmental Health Officer, condition 19 is attached with respect to sound insulation to protect noise break-in to the proposed hotel rooms from the existing entertainment venue. The condition requires that prior to first occupation of the hotel, an assessment of the specified sound insulation shall ensure that the design of the hotel rooms does not exceed specified noise levels. Given the application site is separated from Koko by another existing office building (2 – 6 Camden High Street) and the proposed use is a hotel rather than residential it is

considered the use can be adequately insulated from entertainment noise from Koko, and other external noise sources including road noise.

- 8.16 A Noise Officer has been consulted and is satisfied that the submitted acoustic submission meets the Council's local plan guidelines and therefore acceptable in environmental health terms, subject to conditions 18, 20 and 21.

9. SUSTAINABILITY AND ENERGY

- 9.1 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.

- 9.2 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.

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

Energy and carbon reductions

- 9.4 The proposal qualifies as a 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 (2021). 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 energy reduction targets. 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). The final step is to monitor, verify and report on energy performance (be seen).

- 9.5 Local Plan Policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Energy and carbon summary

- 9.6 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.

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): CPG	Part L2B for retained thermal elements	48.3%
Be green stage (renewables): CLP policy CC1	20%	32.5%
Total carbon reduction: CPG and LP CC1	Greatest possible on-site reduction of carbon emissions, meeting Part L2B for retained thermal elements	65%

Table 3 - Carbon saving targets (for non-domestic major refurbishments) and the scheme results

- 9.7 From the above, the operational carbon savings significantly exceed the non-domestic major refurbishment target values and measures to secure these levels 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

- 9.8 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. The CPG Energy Efficiency and adaptation (2021) 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.
- 9.9 In this case, the development achieves an overall on-site reduction of 65% 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) -

- 9.10 The CPG 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.
- 9.11 In this case, the development significantly meets the Part L2B for retained thermal elements target for non-domestic major refurbishments, but also meets the major development the policy target of 15% in carbon reductions, reducing emissions by 48.3 % at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can avoid

the use of active cooling in the development. Notwithstanding the cooling hierarchy being interrogated as part of the proposals, the hotel rooms were still found to overheat even with feasible passive cooling measures in place, and active cooling is proposed. The proposal includes energy efficient measures like MVHR and low energy light fittings.

Be clean stage (decentralised energy supply)

- 9.12 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.
- 9.13 In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme.

Be green stage (renewables)

- 9.14 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.
- 9.15 In this case, the development meets the policy target of 20%, reducing emissions by 32.5% at this stage through renewables. The proposal includes PV panels on the roof, low carbon heating like ASHP, and a blue roof at the first-floor level which is welcomed. Full details of these will be secured through Conditions 4, 7, and 14.

Be seen (energy monitoring)

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

Climate change adaption and sustainable design

- 9.17 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.
- 9.18 Local Plan Policy CC2 point (h) expects all non-domestic developments, including refurbishments, of 500 sqm of floorspace or above to achieve

“excellent” in BREEAM assessments. A Preliminary BREEAM Assessment has been carried out, showing that all the main targets are met and exceed per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an ‘Excellent’ rating). The proposal reviewed currently achieves a score of 74.7%, which equates to an ‘Excellent’ rating. The Pre-Assessment reports shows that:

- Energy – 22 out of 28 credits are achieved, which equates to 78.5% with a target of 60%;
- Water – 7 out of 10 credits are achieved, which equates to 70%, with the target being 60%,
- Materials – 11 out of 15 credits are achieved, which equates to 73.3%, with the target being 40%

- 9.19 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.
- 9.20 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.
- 9.21 The proposal incorporates water-efficient design measures to minimise onsite water consumption which will be secured within the energy and sustainability plan via s106. Greywater/rainwater recycling is not proposed, however condition 6 would require a feasibility assessment for rainwater/greywater recycling to be undertaken prior to the commencement of works.
- 9.22 A green roof is not feasible given the sloping nature of the existing roof.
- 9.23 Local Plan Policy CC2 discourages active cooling (air conditioning). 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. As such, compliance with the Cooling Hierarchy and a Thermal Modelling Assessment will have to be demonstrated.
- 9.24 The applicant has demonstrated that due the location of the development and the placement of hotel rooms fronting a busy road, relying on the use of openable windows for night-time ventilation is not considered feasible. Windows have not been modelled as they are manually operated and they depend on occupants behaviour. In addition, there are restrictions due to hotel facing main road and noise coming from the nearby Koko entertainment

venue, door which might deter occupants using the openable windows and therefore the unpredictability of occupant behaviour.

- 9.25 In terms of overheating, thermal comfort is only met through active cooling. There is an existing Brise Soliel at the fifth floor and new thermally efficient windows would be installed. The applicant has provided adequate justification for not utilising external shading, or internal blinds, to mitigate overheating to the hotel. However, although internal blinds are not included in the dynamic thermal modelling to avoid relying on user-oriented shading, internal blinds should still be included as part of the development as an option and additional bonus regarding the reduction of solar gain. Notwithstanding, Condition 15 is therefore recommended, to require the applicant to submit evidence to Council, demonstrating that measures to adapt to climate change have been implemented and that overheating risk has been managed. While the proposed hotel would incorporate active cooling, the condition requires the applicant to demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed and any feasible measures implemented.
- 9.26 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.
- 9.27 In this case, the development incorporates SUDS and blue roofs. Details of this system will be secured by condition 20. Flood risk is covered in the 'Flood risk and drainage' section of this report.

10. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 10.1 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.
- 10.2 The proposal is for a change of use with a retrofit approach and no extensions. It does not result in the removal of any trees or vegetation. Given the constraints posed by the site, opportunities for greening are limited, however a blue roof has been incorporated along with some limited ornamental planting on the first floor roof terrace. The inclusion of any substantive trees or planting scheme is not feasible in this instance.

Statutory Biodiversity Net Gain

- 10.3 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 10.4 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.
- 10.5 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.

11. WATER AND FLOODING

- 11.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SuDs) and water efficiency measures.
- 11.2 A Flood Risk Assessment and Drainage Strategy have been submitted as part of this application. SuDs, including a blue roof and rainwater tank are proposed in order to manage the water environmental on and around the site.
- 11.3 The site is not in a local flood risk zone, or on a previously flooded street, however there is risk of surface water flooding in the vicinity of the building, which increases with climate change.
- 11.4 It is not anticipated that there will be any increase in surface water flooding from the development as the building's exterior is to remain as it.
- 11.5 Condition 5 requires the applicant to submit further SUDS details in relation to the proposed rainwater tank and blue/green roof. This condition will ensure that surface-water flood risk and drainage impacts are successfully managed/mitigated. Notwithstanding this, as detailed above, it is noted that the proposed development is for a change of use.
- 11.6 In consultation with the Lead Local Flood Authority, the development will have an acceptable impact on flooding in the area.

- 11.7 Considering the potential for surface water flooding affecting the site, and the nature of the site with transient occupants, the applicant has submitted a Flood Risk Emergency Plan (FREP). The FREP sets out the procedures for managing residual flood risk and ensuring the safety of occupants in the event of a flood. This plan addresses the site-specific risks identified in this assessment, outlines warning and evacuation arrangements, and details roles, responsibilities, and post-flood recovery actions.
- 11.8 The FREP demonstrates that the development and its escape route to be safe. A finalised FREP would be secured by condition, to be submitted to and approved by the Council prior to occupation of the hotel (condition 16).
- 11.9 The Lead Local Flood Authority considers the proposals acceptable subject to condition 5 on SuDs. Given the above, the proposed measures are considered acceptable in terms of flood risk.

12. AIR QUALITY

- 12.1 The site is in an area with historically poor air quality and the scheme with new visitor accommodation would introduce new receptors.
- 12.2 Policy CC4 of the Camden Local Plan means the scheme required a detailed Air Quality Assessment (AQA) including dispersion modelling predicting Air Quality (AQ) impacts. All developments are expected to meet the Mayor's Air Quality Neutral requirements. The applicant has submitted an AQA which reviews the existing air quality conditions in the vicinity of the proposed development site, and the likely air quality impacts resulting from the proposed development. The applicant has worked with council officers to provide updated and detailed information to assess the air quality impact.
- 12.3 The site will be car-free (see the TRANSPORT section) which will meet AQ neutral for transport emissions, as well as for building emission heat and hot water generated using ASHPs. As such, with regard to the operational impact of the development on the local area, the development is considered air quality neutral.
- 12.4 The annual mean concentration of NO₂ at two of the three closest air quality monitoring stations (using 2023 data) on roads in proximity to the site (Camden High Street and Crowndale Road) exceeded the Air quality objectives for NO₂ of 40 µg/m³ for annual mean concentrations, as set out in the Air Quality CPG,.
- 12.5 LAEI 2022 background emissions concentrations - NO₂: Concentrations at the front of the site facing Camden High Street exceed 40–45 µg/m³, above the UK legal AQO limit. Most of the site records levels around 35–40 µg/m³.

- 12.6 In the case of the proposed development being a hotel, the key consideration is the potential for short-term exposure of NO₂. LAQM.TG(22) (Section 7.97) advises that where annual mean NO₂ concentrations are below 60 µg/m³, exceedances of the 1-hour limit are highly unlikely. Therefore the short term NO₂ concentrations are within acceptable limits in accordance with LAQM.TG(22), and no air quality mitigation is considered necessary given the hotel rooms would be used for short-term accommodation.
- 12.7 on the LAEI 2022 background emissions concentrations data, Particulate matters PM₁₀ measure mostly at 15 - 20µg/m³ with a small portion facing Camden High Street at 20–25 µg/m³. This meets the UK legal limit 40µg/m³, but the WHO target that Camden has adopted is at 20µg/m³, and so only a portion of the site is considered to exceed the more stringent target. For PM_{2.5} measure 10–12.5 µg/m³ at the site which meets the UK legal limit at 20µg/m³, however, it is unlikely to comply with the more stringent WHO targets at 10µg/m³.
- 12.8 Although the proposed development is located in an area with existing poor air quality, the use is of a hotel which is considered a temporary accommodation and occupants would not be subject to long-term exposure like a residential development would. Furthermore, the design of the development incorporates a setback of the first-floor hotel rooms from Camden High Street, reducing their exposure to roadside air pollution. In addition, the provision of suitably located MVHR air intakes can further mitigate pollutant ingress and help maintain acceptable indoor air quality. Therefore, Condition 3 is recommended to ensure air inlets are located as close to the roof or away from busy road.
- 12.9 To meet the requirements of policy SI 1 of the London Plan, to not create an unacceptable risk of high levels of exposure to poor air quality, the development would incorporate design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution and provide appropriate mitigation.
- 12.10 The development would be incorporate mechanical ventilation. Condition 3 secures details of the location of air inlets to the buildings to protect internal air quality.
- 12.11 The proposed development is Low Risk for demolition and construction dust because of the nature of the works. Suitable mitigation has been recommended at this stage. However, the full details of mitigation measures to control construction-related air quality impacts would be secured within the Construction Management Plan as per the standard Construction Management Plan (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.

- 12.12 A condition is recommended to ensure that Non-Road Mobile Machinery (NRMM) used on the site complies with the relevant air quality criteria (condition 19). In summary, the proposal complies with the requirements of the development plan in relation to air quality, subject to the recommended conditions and the Construction Management Plan secured by s106 agreement.

13. SAFETY AND SECURITY

- 13.1 CLP policy C5 requires that development incorporate design principles which contribute to community safety and security. LP policy D8 requires public realm to be well-designed, safe, accessible and inclusive. LP policy D11 requires schemes to design and maintain a safe and secure environment that reduces fear of crime. Fearing crime or the chances of being a victim of crime vary notably across age, gender, and race and these discrepancies mean that if the environment is not perceived as a safe public space for all users, certain groups are likely to be excluded or suffer greater impact, contrary therefore not only to CLP policy C5 but also CLP policy C6 which aims to secure access for all.
- 13.2 The current site has an active frontage with retail units at the ground floor either side to the centrally located access to the floors above. These retail units would not be affected by the scheme which relates to the change of use of the upper floors of the building only.
- 13.3 The central access to the frontage features a double set of glazed doors which allow for a clear line of sight to the ground floor corridor and stair/lift core servicing the hotel at the upper floors.
- 13.4 CCTV will cover all building entry points including the reception, and bike / bin stores and to the rear. This means access to the building can be carefully controlled and monitored which is important in minimising risk of crime with hotels.
- 13.5 The nature of the hotel use would provide natural surveillance day and night over Camden High Street. Condition 10 would require the developer to provide confirmation the plans are in line with the standards required for Secured by Design accreditation.
- 13.6 Given the above, the proposals will provide a safe and secure environment in accordance with the policies of the development plan.

14. ACCESSIBILITY

- 14.1 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.

14.2 The building is designed to ensure users benefit from step-free access at the main entrance off Camden High Street, to the lift providing access to the first floor reception. The proposed hotel would be laid out with accessible circulation to ensure all spaces are accessible. 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.

14.3 A condition (13) requiring the provision of 5 (8.7%) fully wheelchair-accessible rooms will be placed on the application. 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 2017.

15. FIRE SAFETY

15.1 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 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.

15.2 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.

15.3 The application is accompanied by a "Fire Safety Planning Statement" document which has been prepared by B-First Fire Safety, a firm of qualified fire engineers. It provides information on; evacuation strategy, fire safety systems, means of escape, internal and external fire spread and firefighting provisions. The document and its recommended measures are secured by condition 26. Given the above, the proposals are considered to comply with London Plan policies D12 and D5.

16. TRANSPORT

- 16.1 Policies T1 and T2 of the CLP promote a move away from dependency on private motor vehicles, and a move to more sustainable modes of transport, supported by the right infrastructure and healthier environments. CLP policy T3 protects transport infrastructure which is also a critical objective of the London Plan.
- 16.2 With a PTAL of 6a and located in a major Town Centre, the site has excellent access to public transport and wider transport infrastructure. The closest tube stations are Mornington Crescent at 75m away and Camden Town at 550m away, with several bus stops close by. It is a sustainable location for additional visitor accommodation and growth.
- 16.3 Camden High Street is a Red Route with double red line road markings on the eastern side of the highway outside the application site, which prohibit stopping at any time. The Red Route parking regulations generally extend out laterally from the main route along the side roads to around 20m. Along the Red Route, there are occasional loading bays where typically loading can take place between 10 am and 4 pm, Monday to Saturday, the nearest being just north of the site on the eastern side of Camden High Street.

Trip generation

- 16.4 Over a typical 12-hour weekday, the hotel is expected to generate around 348 trips (158 in, 190 out) with an AM peak of 18 (4 in, 14 out) and a PM peak of 28 (13 in, 15 out). Given the location, most of the trips would be made by tube, and walking.
- 16.5 Based on other developments in the area, the anticipated high volume of walking trips is likely to be made from the London Underground stations at Mornington Crescent and Camden Town, the nearby bus stops, and from the many restaurants, shops, leisure, and entertainment venues on Camden High Street.
- 16.6 The proposal is expected to generate an increase in approximately 60 trips , or an approximate 21% proportional increase, compared to the existing office use trip generation of 288 trips. This increase is considered acceptable due to the site's highly accessible location. The majority of trips are expected to be made by pedestrians and public transport users, reflecting the site's proximity to Camden Town and Mornington Crescent Underground stations, multiple bus routes, and the Overground network at Euston Station, as well as King's Cross / St Pancras stations. This modal composition indicates that most additional trips will not rely on private vehicles, minimising pressure on the local highway network and supporting sustainable travel patterns.
- 16.7 Considering the increase in active travel to and from the site, a financial contribution of £25,200 towards pedestrian and cycle improvements is

sought and would be secured by S106 agreement. This could be used towards delivery of:

- Making permanent (subject to consultation) of the current trial traffic-free scheme on Camden High Street (north);
- Safe & Healthy Streets upgrades on Eversholt Street;
- Development of bus lanes on Bayham Street (south) as part of our Better Buses programme and;
- East-west cycle corridors linking multiple trip attractors through Camden Town.

Travel planning

- 16.8 A draft Travel Plan was submitted with the planning application. The draft Travel Plan demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections for walking and cycling are acceptable.
- 16.9 A Travel Plan covering an associated monitoring and measures contribution of £11,348 would be secured by legal agreement if planning permission is granted.

Cycle parking

- 16.10 The development will provide a total of 8 cycle parking spaces for the hotel, within the rear service yard. This exceeds the London Plan requirement for 3 spaces for the hotel. The cycle facilities comprise covered cycle standards within the rear yard, which can be accessed from the hotel's rear access or the access off Bayham Place. The cycle parking would be positioned at the north-east corner of the rear yard, adequately offset from the bin storage. Condition 12 would secure details of cycle parking, ensuring the cycle storage would be fully covered and secure.

Car parking

- 16.11 No parking is proposed on site and the whole development would need to be car-free in accordance with Policy T2 of the Local Plan. The hotel would be car-free secured by s106 agreement.
- 16.12 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, the London Plan recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'
- 16.13 Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the

maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site’.

- 16.14 Therefore, an off-site contribution of £4,000 for one disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site, would be secured by s106 agreement. In line with standard practice, Transport officers will determine the most suitable location for the disabled parking bay.
- 16.15 Officers expect the vast majority of guests and staff to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an ‘Electric Vehicles Only’ parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 would therefore be secured by s106 agreement.

Coach parking

- 16.16 There is the possibility of the hotel attracting the arrival of coach parties (which may be outside the applicant’s control) causing delays and safety issues on the streets in the vicinity of the site. A s106 planning obligation would therefore be attached, 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.
- 16.17 Taxis are permitted to drop-off/pick-up from single and double yellow and red lines, which includes parking spaces located on Camden High Street.

Servicing and Refuse/Recycling Collections

- 16.18 A Draft Delivery and Servicing Management Plan was submitted with the application. The proposal hotel use would only generate approximately 1 – 2 servicing trips per day. The servicing will continue in line with the existing arrangements, with refuse collection vehicles parking temporarily on Bayham Place, opposite the rear of 2 – 6 Camden High Street, and bins being wheeled to and from the vehicle and the loading bay located to the rear of the office building (accessed off Bayham Place). A more detailed Delivery and Servicing Management Plan will be secured by s106 agreement.
- 16.19 Bayham Place is a narrow, two-way street subject to double yellow lines, CPZ restrictions and loading controls. The road surface is in generally good condition, although the constrained width, building line proximity and tight

turning radii necessitate managed access. To improve access arrangements for servicing, Transport officers have recommended double yellow lines are introduced on Bayham Place. A financial contribution of £5,000 be secured by s106 agreement, for the implementation of double yellow lines on Bayham Place, is therefore recommended, and will also cover amendments to the traffic management orders.

Construction Management

- 16.20 The proposal will generate a notable volume of construction traffic on a day to-day basis. Although the site is highly accessible, the council needs to ensure that the development can be implemented without unacceptable harm to amenity or the safe and efficient operation of the highway network in the local area. The site is located on Camden High Street, which forms part of TfL's TLRN. 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.
- 16.21 A Construction Management Plan (CMP), a CMP implementation support contribution of £5,000, and a Construction Impact Bond of £8,000 for the construction phases of the development, would be secured to ensure the impacts of construction works on the transport network can be mitigated and managed. These CMP measures would be secured by s106 agreement.

Highway Works

- 16.22 The surrounding road network may sustain damage because of the proposed construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.
- 16.23 A highways contribution would need to allow the Council to repave the footway adjacent to the site on Bayham Place and remediate any other damage to the public highway following completion of works on-site. The highway works would be implemented by the Council's highways contractor on completion of the development. This would require a Highways payment of £20,000 secured by s106 agreement.

Pedestrian, Cycling and Environmental Improvements (PCE)

- 16.24 The proposals at the site will introduce some new pedestrian and cycling trips. The applicant is required to help mitigate and manage the safe travel of the future occupiers to the site. As mentioned above, in line with the increase in walking and cycle trips which would be generated by the proposed development and further promoted by the requested Travel Plan, and the need for pedestrian, road safety and public realm enhancements, a contribution of £25,200 towards implementation of various pedestrian, cycle and bus improvement schemes in Camden Town and nearby Eversholt Street, as cited in section 16.7 above.

Micro and shared mobility improvements

- 16.25 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. 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. A cycle/e-scooter hire improvements contribution of £5,000 would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental ebikes 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

- 16.26 Overall, the proposal is acceptable in terms of transport implications, being car-free and located in a highly sustainable and accessible location in line with planning policy. The existing public highway network has sufficient provision for ancillary transport requirements including taxi pick-up and drop-off. The proposal will not generate a significant level of vehicular traffic and as such, would not have a significant impact on the capacity of the surrounding highway network. Secure and undercover long-stay and short stay cycle parking would be provided.

17. REFUSE AND RECYCLING

- 17.1 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.
- 17.2 The existing refuse storage area at the rear of the building within the service yard would be retained and would be suitably sized for the hotel use.
- 17.3 There will be an estimated 2 refuse collections a week and step-free access is provided to the refuse area. Condition 11 requires the refuse storage area to be provided before the commencement of the use hereby permitted and retained for the duration of the development and a detailed delivery and servicing plan would be secured by Section 106 legal agreement.

18. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 18.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is 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.

- 18.2 Sections 54-60 of the CPG (Employment Sites and Business Premises) expect a financial contribution where there is a loss of employment space/office over 500 sqm. The number of full-time (FT) jobs created through the hotel use would be less than the existing use, therefore this should be compensated for. The contribution is based on the difference between the number of jobs expected to be supported if a building remained as its existing employment-generating use and the number of jobs expected to be generated by the hotel use.
- 18.3 As per Paragraphs 6.10-6.15 above, the contribution amount would be £55,930.00 for the loss of employment space which will be secured by Section 106 legal agreement.
- 18.4 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term, outlined as follows.

During construction

- **Apprenticeships** - the applicant 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 £6 million, this would mean 2 construction apprentices and a £3,400 support fee.
- **Construction Work Experience Placements** - the applicant should provide 2 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 Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG and shall be paid London living wage. If these placements are not delivered, a default payment will be required (as per section 69 of the CPG).
- **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than 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

- 18.5 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments which will result in a net increase of 1,000sq m (GIA) or more of employment space including office, hotel and leisure developments.
- 18.6 The applicant has agreed to the following end use/occupation phase opportunities:
- Apprenticeships – 1 end use apprenticeship. The employment Apprenticeships will be recruited via Camden's Inclusive Economy Service (Future Talent Team).
 - Work experience opportunities – The applicant should provide 2 work experience opportunities of not less than 2 weeks for the occupation phase of the development, paid London living wage. The applicant should liaise with Camden's Inclusive Economy Service (Future Talent Team) on this.
- 18.7 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining Camden's Inclusive Business Network
 - Working with Good Work Camden//the Council's Inclusive Economy Service to recruit to vacancies locally.
 - Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.
- 18.8 The above measures would be included in a package of **Employment and Training measures secured by s106 agreement** in accordance with CLP policy E1 and the CPG.

19. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 19.1 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.
- 19.2 No new floorspace is proposed at this stage so it will not be CIL liable.

20. CONCLUSION

- 20.1 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.
- 20.2 This application meets the policy tests of Policy E2 of the Local Plan, which seeks to protect existing employment space within the borough. The two plus years of marketing evidence has demonstrated a lack of demand, and the constraints posed by the existing building and quality of the existing office space contribute to this lack of interest. The existing retail units at ground floor would be retained.
- 20.3 The London Plan and Local Plan support the delivery of small-medium scale hotels within Camden Town Centre, which is near many destinations and attractions. The proposed high-quality and sustainable hotel will bring a partially vacant building back into use and will optimise the building's environmental performance, with a BREEAM 'excellent' building, energy efficient, air quality neutral and resilient to climate change.
- 20.4 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.
- 20.5 Accessibility and inclusive design standard have been met, with over 5% of hotel rooms designed to be wheelchair accessible. The scheme includes significant contributions including for transport and highways, loss of employment space and an employment and training package.
- 20.6 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.

21. RECOMMENDATION

- 21.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:
- Travel Plan and associated monitoring and measures contribution of £11,348.
 - Car-free development.
 - Off-site accessible car parking contribution of £4,000.
 - Construction management plan (CMP), CMP implementation support contribution of £5,000, and CMP Impact Bond of £8,000.
 - Delivery and Servicing Management Plan.
 - Highway works contribution of £20,000.

- Implementation of double yellow 'No Waiting' markings contribution on Bayham Place of £5,000
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000
- Pedestrian, Cycling and Environmental Improvements contribution of £25,200.
- Micro and shared mobility improvements contribution of £5,000.
- No coach party bookings and a ban on customers being picked up or dropped off by coach at any time outside the hotel.
- Construction Apprenticeships – 2 x Apprentice paid London Living Wage + £1,700 in support fees
- Construction Work Experience Placement – 2 x work experience placement
- End Use Apprenticeships – 1 x end use apprenticeship
- End Use Work Experience Placement - 2 x work experience placement
- Employment and training contribution of £55,930.00
- Local Construction Recruitment (20%)
- Local Construction Procurement (10%)
- Local Employment Commitments (Network, Recruitment, and Work Experience)
- Sustainability plan (BREEAM compliance) – secure BREEAM Excellent rating.
- Energy Efficiency and Renewable Energy Plan
- 'Be Seen' Energy monitoring
- Hotel Operational Management Plan

22. LEGAL COMMENTS

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

23. CONDITIONS

Standard conditions

1 Time limit

The development hereby permitted must be begun not later than 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 and documents:

P-001; P-002; P-003; P-004; P-005; P-006; P-007; P-008; P-009; P-010; P-011; P-012; P-013; P-014; P-015; P-016, rev A; P-017; P-018, rev B; P-019; P-020; P-021; P-022; P-023; P-024, rev B

Reason: For the avoidance of doubt and in the interest of proper planning.

Pre-start conditions (any works)

3 Mechanical ventilation

Prior to commencement of development, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved in writing by the local planning authority. Air inlet locations should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of the hotel occupants in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

4 Blue roof

Prior to commencement of development, full details in respect of the blue roof in the area indicated on the Proposed First Floor Plan appended to the approved Flood Risk Assessment and SuDS Strategy prepared by Hilson Moran, 30/01/2026, ref. 37207-HML-XX-XX-RP-U-870002, rev P03, shall be submitted to and approved in writing by the local planning authority. Details of the blue roof provided shall include: catchment area, storage volume (minimum of 4.89m³), drainage rate, is available in terms of the construction and long-term viability of the blue roof, as well as details of the maintenance programme for blue roof. The use shall not commence 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 G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

5 SuDS: Further details

Prior to commencement of development, full details of the sustainable drainage system including a minimum of 4.89m³ blue roofs and 52.25m³ attenuation tank, 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, and shall demonstrate the run off rates approved by the local planning authority. A revised drainage statement, SuDS pro-forma and supporting evidence should be included:

- Detailing the Health and Safety risks related to the SuDS design;
- Detailing the maximum substrate depth available in the blue roof, which should be 150mm unless justified; and
- Details shall include a lifetime maintenance plan for all proposed SuDS components and its responsible party, and systems shall thereafter be installed and thereafter 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 2017.

6 Greywater/ rainwater harvesting:

Prior to the commencement of development, a feasibility assessment for rainwater/greywater recycling shall be submitted to and approved in writing by the local planning authority. If the approved assessment demonstrates that such recycling would be feasible, details shall be submitted to and approved in writing by the local planning authority. The development shall thereafter be constructed in accordance with the approved details and maintained and retained as such thereafter.

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.

7 Solar PV – Evidence of Installation

Prior to commencement of works, drawings and data sheets showing the location, extent (at least 78m²) and predicted energy generation of photovoltaic cells (at least 14,421kwh/annum) 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 of the London Borough of Camden Local Plan 2017.

8 London Underground

Prior to the commencement of works on site, in consultation with TfL Infrastructure Protection, the following information shall be submitted and to and approved in writing by the local planning authority:

- a) Identify existing London Underground structures which are located in the vicinity of existing building and/or have interface with existing building foundation.
- b) Provide anticipated building load changes on London Underground structures and tunnels for construction stage and permanent stages. Dependent on the load changes, assessment of ground movement arising from the development stages may be required.
- c) Provide lift plan and assessment of ground and tunnel capacity for the use of tall plant.
- d) An assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

9 Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of works, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

- a) Detailed drawings including plans, coloured elevations and sections of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
- b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
- c) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.
- d) Details of integrated bird and bat boxes, and insect habitats.

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 premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

10 Secured by Design standards

Prior to commencement of works, proof that the plans are in line with Secured by Design standards and accreditation must be submitted to and approved in writing by the local planning authority.

Reason: To ensure that the development mitigates the risk of crime and antisocial behaviour in accordance with policy C5 of the London Borough of Camden Local Plan 2017.

11 Waste and recycling

Prior to commencement of works, details of the storage and collection of refuse and recycling for the hotel us shall be submitted to and approved in writing by the local planning authority. The development shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of the hotel and shall be retained thereafter.

Reason: To ensure the hotel includes adequate facilities for the storage and collection of waste and recycling, and to avoid obstruction of the surrounding streets and ensure the safety of pedestrians, cyclist and other road users, in accordance with policies CC5, T1 and T3 of the London Borough of Camden Local Plan 2017.

Prior to occupation or use

12 Cycle parking (long-stay)

Prior to first occupation of the development, details of secure and covered cycle storage areas for 8 x cycles 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 hotel and permanently retained and maintained 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.

13 Wheelchair accessible rooms

Prior to first occupation of the development, there shall be the provision of 5 fully wheelchair accessible rooms, as demonstrated on the approved proposed first, second, third, fourth and fifth floor plans.

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

14 Air Source Heat Pump with Active Cooling (Non-residential)

Prior to occupation of the development, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more), the refrigerants used in the system is of global warming

potential at or lower than 675, SEER of at least 5.1, 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 input from the approved renewable energy systems. A site specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the local planning authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities, and to ensure that all development reduces the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with the requirements of policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.

15 Overheating

Prior to occupation and notwithstanding active cooling for the proposed hotel being permitted, evidence shall be submitted and approved in writing by the Local Planning Authority, demonstrating that measures to adapt to climate change have been implemented and that overheating risk has been minimised. It needs to demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed and any feasible measures implemented. The measures to be implemented should at the minimum include internal blinds, retention of brise soleil on level 5, internal blinds, and MVHR with air tempering.

Reason: To ensure the development reduces the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with the requirements of policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.

16 Flood Risk Emergency Plan

Prior to first occupation of the development, a final Flood Risk Emergency Plan shall be submitted to and approved in writing by the Council. The 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 reflect suitable routes for emergency vehicle access with suitable mapping and figures;
- provide details that the emergency services have been consulted on the plan, with details on infrastructure that may be required for them;
- provide details of alarm system if proposed; and
- provide details of signage required along the main emergency egress route, which is not predicted to be dry in extreme rainfall events.

The development shall thereafter be carried out in accordance with the approved Flood Risk Emergency Plan.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

17 Sustainable Urban Drainage Systems (Evidence of installation)

Prior to first occupation of the development, evidence that the SuDS system has been implemented in accordance with the approved details as part of the development shall be submitted to the local planning authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

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 2017.

18 Noise levels in hotel rooms

Prior to first occupation of the development, details shall be submitted to and approved in writing by the local planning authority that the noise levels in hotel rooms do not exceed 47dB and 41dB (Leq, 5mins), respectively in the 63Hz and 125Hz octave centre frequency bands.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise from external noise sources in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

Compliance conditions

19 Non-road mobile machinery (NRMM)

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 safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

20 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest 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 site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

21 Anti-vibration isolators for plant

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.

22 No additional external fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

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.

23 Number of hotel bedrooms

The development hereby permitted shall not comprise more than 57 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.

Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan 2017.

24 Roof terrace

The roof terraces hereby approved shall be used by the occupiers of the building only and shall not be used outside the hours of 08:00 and 21:00. Live music shall not be allowed at any time on either of the terraces.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by noise or disturbance, in accordance with the requirements of Policies A1 and A4 of the London Borough of Camden Local Plan 2017.

25 Fire safety

The development shall at all times be occupied and managed in strict compliance with the Fire Safety Planning Statement prepared by B-First Fire Safety, 29/08/2025, rev 02.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.

Building regulations (imposed optional requirements)

26 Water use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

24. INFORMATIVES

1	Conditions marked with ** The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information. If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.
2	Building Control 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 on 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 SelfBuild 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	Community Infrastructure Levy This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.
7	Construction Management Plans 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.
8	Highways 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.
9	Party Wall 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.
10	Environmental Health 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.
11	Adverts 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	Thames Water 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. 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 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.
13	Legal Agreement Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

