

Address:	Kingsway House 103 Kingsway London WC2B 6QX		9
Application Number(s):	2024/3493/P	Officer: Josh Lawlor	
Ward:	Holborn and Covent Garden		
Date Received:	19/08/2024		
Proposal:	Change of use of existing building from commercial use (Class E) to apart hotel use (Class C1), extension and remodelling of upper storeys to accommodate further Class C1 apart hotel floorspace, including new 8th floor, provision of ancillary facilities and retention of Class E commercial unit at ground floor level and associated works including refurbishment of façade.		
Background Papers, Supporting Documents and Drawing Numbers:			
Supporting documents:			
<p>Covering Letter 14 August 2024, CIL Form 14 August 2024, Site Location Plan (Scale 1:1250) 6 February 2024, Design & Access Statement Studio Moren 13 August 2024, Planning & Heritage Statement Montagu Evans 14 August 2024, Marketing and Loss of Employment Report Bluebook 9 August 2024, Construction Management Plan Elliot Wood 12 August 2024, Daylight and Sunlight Assessment Consil 17 July 2024, Ecology & Biodiversity Statement Hilson Moran 22 July 2024, Energy & Sustainability Strategy (Incl. Overheating Assessment & BREEAM) Hilson Moran 26 July 2024, Acoustic Report Hilson Moran 26 July 2024, Air Quality Assessment Hilson Moran 17 July 2024, Transport Assessment (Incl. Delivery & Servicing) Elliot Wood 6 August 2024, Travel Plan Elliot Wood 5 August 2024, Sustainable Drainage Systems Strategy Elliot Wood 19 July 2024, Tree Survey/ Arboricultural Assessment GHA Trees 3 June 2024</p>			
Existing:			
<p>A 025 099 P1 Existing Basement Plan, A 025 100 P1 Existing Ground Floor Plan, A 025 101 P1 Existing First Floor Plan, A 025 102 P1 Existing Second Floor Plan, A 025 103 P1 Existing Third Floor Plan, A 025 104 P1 Existing Fourth Floor Plan, A 025 105 P1 Existing Fifth Floor Plan, A 025 106 P1 Existing Sixth Floor Plan, A 025 107 P1 Existing Seventh Floor Plan, A 025 108 P1 Existing Roof Plan, A 025 150 P1 Existing Elevations Sheet 1 of 2, A 025 151 P1 Existing Elevations Sheet 2 of 2</p>			
Demolition:			
<p>A 050 099 P1 Demolition Basement Plan, A 050 100 P1 Demolition Ground Floor Plan, A 050 101 P1 Demolition First Floor Plan, A 050 102 P1 Demolition Second Floor Plan, A 050 103 P1 Demolition Third Floor Plan, A 050 104 P1 Demolition Fourth Floor Plan, A 050 105 P1 Demolition Fifth Floor Plan, A 050 106 P1 Demolition Sixth Floor Plan, A 050 107 P1 Demolition Seventh Floor Plan, A 050 108 P1 Demolition Eighth Floor Plan</p>			

Proposed:

A 100 001 P1 Proposed Site Plan, A 100 099 P1 Proposed Basement Plan, A 100 100 P1 Proposed Ground Floor Plan, A 100 101 P1 Proposed First Floor Plan, A 100 102 P1 Proposed Second Floor Plan, A 100 103 P1 Proposed Third Floor Plan, A 100 104 P1 Proposed Fourth Floor Plan, A 100 105 P1 Proposed Fifth Floor Plan, A 100 106 P1 Proposed Sixth Floor Plan, A 100 107 P1 Proposed Seventh Floor Plan, A 100 108 P2 Proposed Eighth Floor Plan, A 100 109 P1 Proposed Roof Plan, A 100 150 P2 Proposed Elevations, A 025 151 P2 Proposed Elevations, A 025 152 P2, Proposed Sections AA and BB

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement.

Applicant:

GSM Estates Ltd

Agent:

Gabriella Bexson
Montagu Evans
70 St Mary Axe
London
EC3A 8BE

ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Commercial, business and service	3,272	109	-3163
C1	Apart-Hotel (including plant area)	0	+3,486 (including 208 through remodelling and extensions)	+3,486

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	0	0	0
Car - Disabled accessible	0	1 (secured through a financial contribution)	1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	+4	+ 4
Cycle – short stay	0	+8 (secured through an off-site contribution)	+8

EXECUTIVE SUMMARY

- i) The applications are for change of use of the existing office building at 99-103 Kingsway to a Class C1 apart-hotel, providing 58 bedrooms. The proposal includes a roof extension that provides 240 sqm of additional floor space.
- ii) There is retail (Class E) on the ground floor but one of the retailers left the building in 2021, and the building was vacated entirely in December 2022. This application is supported by marketing evidence from March 2023, and the applicant marketed the building throughout their ownership since the 2016 and 2021 applications for the office refurbishment and extension schemes. The marketing evidences periods of vacancy demonstrate a lack of market demand and questioning the suitability of this building for Class E office space of this size in this location. The site's deep cellular floorplates have contributed to the lack of market interest. It is also considered that the site is likely to require more investment than a rational owner would want to invest in the site with no guarantee of an end-user and taking account of the quality of the space which could be provided. The existing site is

not considered to be suitable for continued business use. It is therefore considered that the loss of employment use does not conflict with policy E2 of the Local Plan, subject to a contribution to creating or promoting opportunities for employment or training of local people in accordance with the CPG (Employment Sites and Business Premises).

- iii) The London Plan and Local Plan support the delivery of visitor infrastructure within the Central Activities Zone, which is near many tourist destinations and attractions. The proposed aparthotel will bring a building that has been vacant back into use. The proposal will enhance and optimise the buildings' environmental performance by retaining and upgrading the building fabric and services strategy.
- iv) The extensions and alterations respect the architectural character of the host building and are similar to those approved in 2017 and confirmed as an extant permission in 2021. The proposed bulk and massing of the top floor plant room and the architectural expression of the extensions have been revised following advice from the Council's Conservation Officer and Design Officer. The proposal is considered to be of improved design, which will not harm the character and appearance of the building or the Kingsway Conservation Area.
- v) Subject to the recommended conditions and S106 obligations, the development would not harm neighbouring amenities, the local transport network, or infrastructure.

OFFICER REPORT

Reason for Referral to Committee: Development involving the change of use of more than 1,000 sqm of non-residential floorspace (Clause 3(ii)); and subject to the completion of a S106 legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).

1. SITE AND BACKGROUND

Location

- 1.1 Kingsway House comprises a building of ground plus 6 storeys (plus basement level). The building has a lawful Class E use (Commercial, Business and Service) with the basement and ground floors most recently accommodating retail floorspace and the upper floors being utilised for office use. The building was completely vacated in December 2022.
- 1.2 Kingsway House fronts onto Kingsway, facing east. Great Queen Street flanks the building to the south and Parker Street to the north.
- 1.3 The site is within the Central London Area and London's Central Activity Zone (CAZ). The building's frontages on Great Queen Street, Kingsway and Parker Street are designated as Central London Frontage.

- 1.4 The site is within the Kingsway Conservation Area. The building, designed by A Sykes and built circa 1905, is not listed but is identified as a building that makes a positive contribution to the character and appearance of the Kingsway Conservation Area. Two listed buildings are located within the site's immediate vicinity: 60 Parker Street and 5 Great Queen Street.
- 1.5 The site has a Public Transport Accessibility Level ("PTAL") of 6b, the highest rating achievable. It is a short walk from Holborn Underground Station.
- 1.6 The surrounding area includes many uses, primarily offices, retail, hotel, and some residential.
- 1.7 The site has a low probability of flooding (Flood Zone 1).

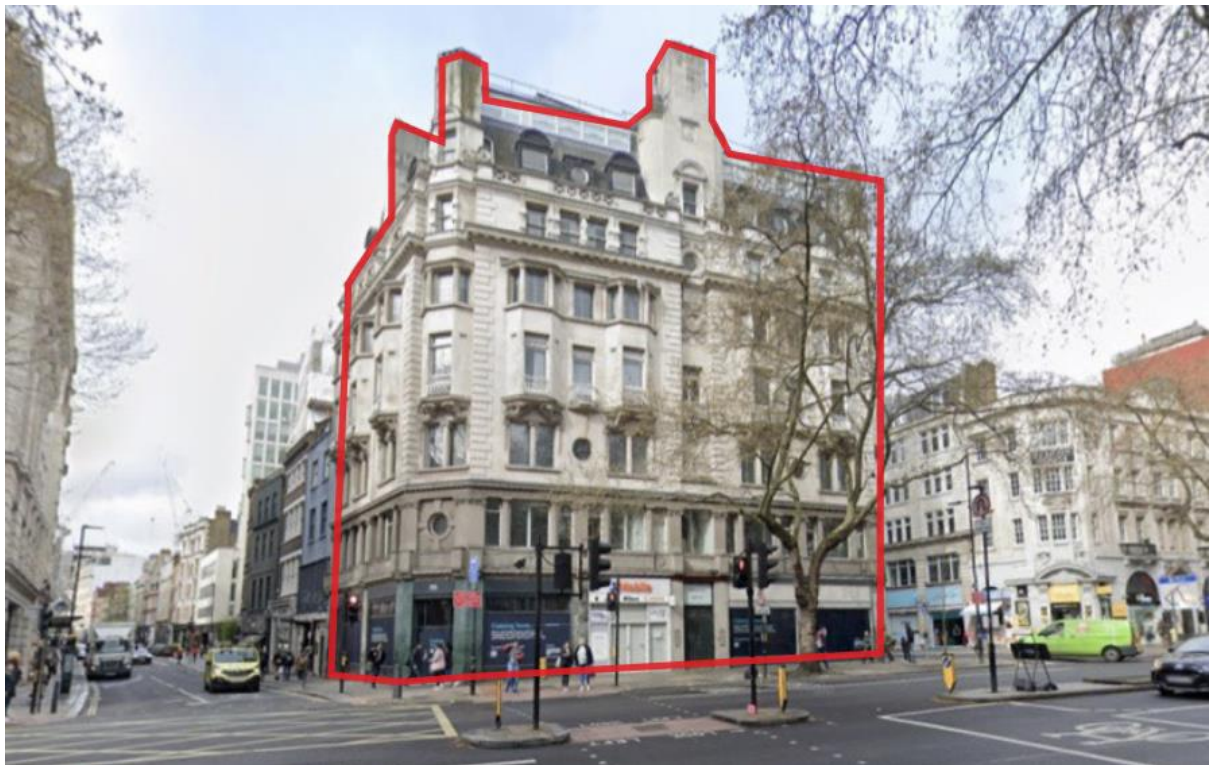


Figure 1 View of the site

2. THE PROPOSAL

- 2.1 The proposal is to convert the existing office (Class E) into an aparthotel (Class C1).
- 2.2 The existing site currently has a GIA of 3,272 sq. The proposals include a 58-room apart hotel on ten floors, including the ground and basement, plus 8 storeys. A lobby area is provided at the ground floor level, which will include ancillary café. A broad summary of works include:

- Remodelling and extension of upper storeys to provide an additional 240 sqm of GIA floorspace;
- Provision of 58 aparthotel rooms which are hotel bedrooms with kitchen facilities;
- Replacement plant services;
- Ancillary facilities, including publicly accessible bar/restaurant and meeting/co-working space;
- Retention of a Class E commercial/F&B unit at ground floor level on Kingsway / Great Queen Street; and
- Creation of new frontage and entrances.

2.3 The scheme activates the street frontage along Kingsway, Parker Street, and Great Queen Street. The proposed ground floor is shared between the aparthotel lobby area (which includes a publicly accessible café) and an independent retail unit.

2.4 Ref. 2016/3432/P, granted on 23/11/2017, was for the demolition of the 6th and 7th floors, lift overrun, replacement with a double mansard roof, and setback of the 8th floor, with internal reconfiguration to provide additional office (Class B1a) and retail floor space (Class A1/A3).

2.5 Revisions

2.6 The following revisions were sought and received from the applicant in relation to the roof extensions:

- The design and form of the 8th floor was changed from a box like structure to more of a mansard design using material that blend in more seamlessly with the rest of the building with less reflective qualities.
- The size of the top floor plant room was reduced and the materials amended to blend seamlessly with the rest of the building, rather than being a darker material.

3. RELEVANT HISTORY

99-103 Kingsway

3.1 2016/3432/P - Demolition of 6th and 7th floors and lift overrun and replacement with double mansard roof and set back 8th floor, with roof terrace above; internal reconfiguration to provide additional office (Class B1a) and retail floor space (Class A1/A3). Granted 23/11/2017 and implemented.



Figure 2. Consented scheme in 2017

- 3.2 2021/1368/P - Certificate of lawfulness for 'Commencement of works in accordance with condition 1 (within three years from date of permission) of planning permission 2016/3432/P granted on 23/11/2017 and extended until 01/05/2021 under Section 93B of the TCPA 1990 (as amended by Section 17 of the Business and Planning Act 2020) and amended under application ref 2020/4797/P dated 11/11/2020, for (for demolition of 6th and 7th floors and lift overrun and replacement with double mansard roof and set back 8th floor, with roof terrace above; internal reconfiguration to provide additional office (Class B1a) and retail floor space (Class A1/A3))'. Granted 16/04/2021.

4. CONSULTATION

Statutory consultees

- 4.1 Lead Local Flood Risk Authority consulted and no objection subject to conditions for further details the SUDS/blue roof.
- 4.2 TfL Infrastructure Protection Engineering responded with a request for a condition (No. 22) for further details of the development concerning London Underground Piccadilly line tunnel

Local groups

- 4.3 No comments were received.

Adjoining occupiers

4.4 3 sites notice were displayed as follows:

- 1 x SN outside 99 – 107 Kingsway
- 1 x SN outside 62 Parker Street
- 1 x SN outside 4 Great Queen Street

4.5 No comments were received

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2023 \(NPPF\)](#)

[The draft NPPF \(2024\)](#)

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

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy H1 Maximising the supply of self-contained housing](#)

[Policy H2 Mixed use policy](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[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 A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)

[Policy CC5 Waste](#)

[Policy TC2 Camden's centres and other shopping areas](#)

[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](#)

[Basements - 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](#)

[Public open space - January 2021](#)

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

[Transport - January 2021](#)

[Trees CPG - March 2019](#)

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

Other guidance:

[Kingsway conservation area statement](#) (PDF)

Draft Camden Local Plan

The Council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for which consultation has now ended (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6. ASSESSMENT

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

7	Land use
8	Design and Heritage
9	Impact on Neighbouring Amenity
10	Sustainability and Energy
11	Air Quality

12	Transport
13	Refuse and Recycling
14	Fire Safety
15	Employment and Training Opportunities
16	Biodiversity Net Gain
176	Community Infrastructure Levy (CIL)
18	Conclusion
19	Recommendation
20	Legal Comments
21	Conditions
22	Informatives

7. LAND USE

Loss of Office Use

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period.
- 7.2 The demand for Grade B office space has reduced due to the shift in occupier preferences towards best-in-class Grade A office space. Buildings with compromises such as poor building amenity, specifications, and configurations such as Kingsway House are struggling to find a market. As a result, the Grade B stock is experiencing void periods.
- 7.3 Whilst the Western side of Holborn (towards Covent Garden and Fitzrovia) has experienced some good leasing activity, historically, the small to medium-sized buildings along the Kingsway corridor have lacked best-in-class amenities and arrival experiences. Consequently, this has resulted in subdued leasing activity and low rental levels. Kingsway House was previously let at c.£41 per sq ft, and this area has traditionally been seen as a secondary location by the central London office market.
- 7.4 Midtown Submarket Analytics

7.5 There is demand for best-in-class. The applicant market analytics states that Q1 2024 was at its lowest level for 18 months and below the 10-year quarterly average in terms of take up of second hand Grade B Office space. Of the Q1 take-up, 65% was for new/refurbished office space, 26% was for second-hand Grade A stock, and 9% was for second-hand grade B stock. New leases only a small proportion are businesses taking second-hand Class B space.

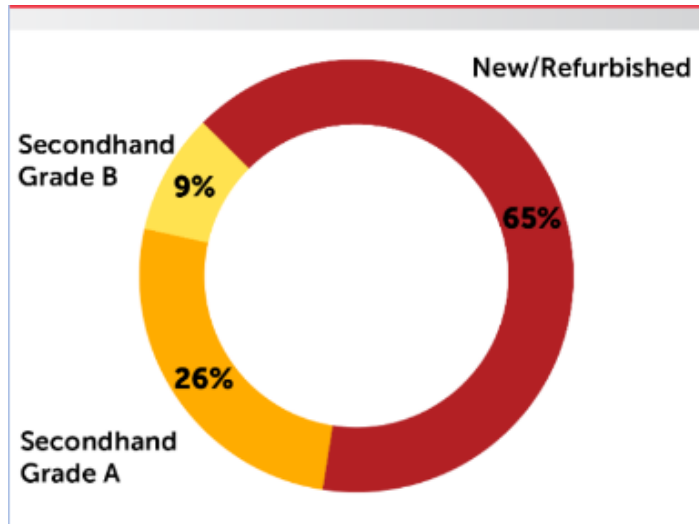


Figure 1 percentage of grade by stock

7.6 EPC—The building currently has varying EPC ratings of E to D based on the different floors and individual office addresses in the building. The applicant states that EPCs are now expected to be at A or B. The minimum legal requirement is expected to be a C by 2027. Below, is a summary of the building's current specifications

- Inefficient floorplate -The building floorplates are split into two equal-sized suites per storey, each approximately 1,000 sq ft.
- Small reception accessed directly from Kingsway.
- 2 x Passenger lifts (undersized and non-DDA compliant)
- There is minimal WC provision - male and female WCs are in the communal parts on only the 2nd and 5th floors.
- No end-of-trip facilities (cycle storage or showers).
- No outside amenity.
- Structural walls in part.
- Mineral tile suspended ceilings.

7.7 The small, confined suites are no longer commensurate with today's market requirements. Occupiers generally seek more contemporary, collaborative office space; the period-style build does not offer the flexible workspace they seek.

- 7.8 The size of the suites limits the marketability of the building. The market for occupiers looking at c.1,000 sq ft spaces is competitive as there are many serviced and fully managed offices on the market. These competing products are often in refurbished buildings.
- 7.9 The London office market has continued to witness the divergence between best-in-class space and Grade B stock. According to Knight Frank's Central London office report, the total take-up for prime office space was 61% of last year's annual take-up, which sits above the long-term trend.
- 7.10 Marketing evidence
- 7.11 The applicant has marketed the building throughout its ownership and since the 2016 and 2021 applications for the office refurbishment and extension schemes were submitted. Regarding the building's occupancy, one of the ground-floor retailers left the building in 2021, and the building was vacated entirely in December 2022. The average void rate between 2019 and 2022 (when the building became entirely vacant) was 36.5%. The building has failed to attract significant demand to reduce the void period.
- 7.12 The building is currently let to a charity on a peppercorn rent basis. The applicant has agreed to work with the charitable organisation to relocate them to a different location but no further details are known about this.
- 7.13 The 2017 permission sought to refurbish and improve the office space. The applicant believes that even if this were fully implemented it would not have overcome all of the issues with the space like the configuration of small office suites. Their view is that realistically the development is unviable to pursue, as the net costs for refurbishment are more than £20 million, with the rental return unlikely to meet expectations for a return on investment. The 2017 permission does show a serious attempt to refurbish the premises and make it more attractive to tenants within its existing use.



Figure 3 – Google Street View imagery shows as recently as April 2023, the site was being marketed as improved Grade A office space

7.14 Since March 2023, Bluebook has been actively marketing the building to secure single or multiple tenants. Marketing of the property was ongoing at the time of submission. The applicant's marketing exercise conducted by Blue Book was following paragraph 44 of the CPG Employment Sites and Business Premises, as summarised below:

- In-house letting details included displaying the property on their website, noting the office use – <https://bluebooklondon.com/>
- The building was offered based on a new lease at a minimum of 12 months. The rent, including the service charge, was advertised at £65.00 per sq ft. Marketing information include details of a range of accommodation from parts of single floors to the entire building.
- A to-let board was erected at first floor level in 2023.
- The property is also published in Agent Society and Costar Loopnet. These circulate quarterly reminders about Kingsway House's availability around the market.
- Office use is noted on the marketing particulars, including the size of individual rooms and floors.
- Bluebook has been marketing the building since 2013.

7.15 Planning permission was granted to refurbish and extend the property in November 2017, and the building became vacant in December 2022.

However, this scheme did not progress, and Bluebook was instructed to increase marketing efforts in March 2023.

7.16 The level of interest in the building was minimal. Therefore, discussions around rental levels and other incentives were never instigated. The property received interest from 13 potential tenants, but none translated into a viewing or serious interest.

7.17 Common reasons for lack of interest were that floorplates were too small, lack of open-plan space, the entrance was not big enough, not sufficient quality, lack of presence and client-facing space and limited WC provision.

7.18 Compensation for loss of employment space

7.19 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. These monies will be held by the Council and used to support activities that create or promote opportunities for employment or training, which could include providing affordable employment space in the borough.

7.20 The calculation of the appropriate contribution will take account of the proposed alternative use of the floorspace and whether this use can be expected to create employment or training opportunities for Camden residents.

7.21 Employment floorspace lost (sq. m) 3163 / 12 space requirement per full time employee = 263 full time jobs lost.

7.22 Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use): 263 – 43 (from application form) = 220 FT jobs

7.23 Full time jobs lost 220 x 21% [% of Camden residents who work in Camden] 46 x £3,995 [cost to provide training per employee] = £184,569

Preferred Use for Residential

7.24 Policy H1 (a) and (d) regard housing as the priority land use of the Local Plan and make housing the top priority when considering the future of unused and underused land and buildings. While Policy H1 makes housing the priority for land use when considering the future of unused and underused land and buildings, it is recognised that other development plan policies support a hotel use in this location. This includes London Plan policies, E10, SD4 and SD5,

which support 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.

Proposed Hotel Use

- 7.25 London Plan policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.
- 7.26 Serviced apartments are a use that are found within the CAZ. The London Plan Policy E10 endorses the provision of "smaller-scale" serviced accommodation in "other parts of the CAZ" (except in wholly residential streets or predominantly residential neighbourhoods) and "subject to the impact on office space and other strategic functions."
- 7.27 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 are expected in Central London. This can include serviced apartments with hotel-like amenities and services but with more space and privacy like a traditional apartment.
- 7.28 The proposed hotel will provide 58 bedrooms. A hotel of this size would be acceptable in this location within the Central London Area. It would bring benefits to the area in terms of attracting footfall, supporting local businesses in the service sector, and maintaining a level of vibrancy in an otherwise quiet and underused part of the Borough, particularly outside of office hours. The proposed use would also bring new jobs to the area. An employment and training benefits package has also been secured (see section 15 below). Overall, the principle of the hotel's use at the site is acceptable.

Mixed Use Development

- 7.29 Policy H2 (Maximising the Supply of Housing from Mixed-Use Schemes) states that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. Within the Central London Area, where more than 200 sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace should be housing, subject to certain considerations.
- 7.30 The proposal provides an uplift of 240 sqm of commercial floorspace (GIA), 208 sqm of this through the new 8th-floor accommodation. Accordingly, Policy H2 would require approximately 120 sqm of residential floorspace.

7.31 Policy H2 states that on-site housing is expected where 1000 sqm of additional floorspace is proposed as this is sufficient to support the stairs, lifts and circulation space needed to serve them.

7.32 In considering whether housing should be provided on-site and the most appropriate mix of housing and other uses, the Council will take into account the impact of a mix of uses on the efficiency and overall quantum of development and whether an alternative approach could better meet the objectives of this policy and the Local Plan. The applicant in their residential study document and justification state that incorporating residential would result in losing 12 hotel rooms – six due to the required lift access and six due to the residential accommodation.

7.1 Introducing residential would require additional separation and impact the useable area. The additional floorspace on the upper levels (7th and 8th floors) is only 240 sqm. The applicant believes that only the 8th floors would be suitable for residential use to avoid sandwiching the residential use within a commercial building.

7.2 Incorporating residential at the 8th floor would require a designated lift that cannot be accommodated within the floorplate. To meet best design practice, any onsite residential would also be expected to feature a dedicated ground floor entrance and core and ancillary ground floor storage areas. The spatial requirements of such provision would significantly impact the usable floor area and lead to a reduced urban design and active frontage. There would also be issues around a second means of escape associated with building control requirements.

7.3 Inclusion of residential would affect the management of the building as visitor accommodation. Self-contained housing would not be compatible with the operational requirements of the proposed non-residential use.

7.4 The applicant has confirmed that they do not own any sites suitable for conversion to residential use. As such, a payment in lieu towards housing elsewhere in the Borough is considered acceptable, considering the cascade in policy H2. The calculation is as follows as per CPG Housing 2021:

$208 \text{ sqm} \times 50\% = 105 \text{ sqm}$ (floorspace target)

$104 \times 1,500 \text{ psm} = \text{£}156,000$

A Section 106 Agreement would secure the payment in lieu.

8. DESIGN AND HERITAGE

Designated and non-designated heritage assets

- 8.1 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision-making. The design and heritage policies set out in the Camden Local Plan (CLP) (Policy D1 and D2) and London Plan (LP) policy on heritage (Policy HC1) all note the importance of character and appearance. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets.

Impact of proposals

- 8.2 The proposal involves demolishing the existing 7th floor, the lift overrun, and the plant room and replacing them with a double mansard roof, a set-back 8th-floor mansard, and a plant room.
- 8.3 The application site is within the Kingsway Conservation Area, and the building is identified as making a positive contribution to the area's character and appearance. The proposal would have a more traditional mansard design, which is seen as a positive compared to the extant scheme. Replicating the existing mansard design on the 7th floor is acceptable.
- 8.4 The 8th floor is similar in scale to the 2016 scheme in massing. The 9th-floor plant room is visible in longer views, as shown below. These views have been reviewed by the Council's Conservation Officer, who does not object to the scheme or identify harm to the conservation area.



Figure 4. Consented scheme granted in 2017



Figure 5. Originally proposed scheme which was revised to the below



Figure 6. 3D View of the extension from Kingsway



Figure 7. 3D View of the extension from Kingsway

- 8.5 The changes to the shopfronts are also considered acceptable. The approval would be subject to a planning condition that will require the submission and approval of materials and detailed drawings prior to the commencement of works to ensure they are of a suitable high standard.
- 8.6 It is noted that when built the ground floor was split into banking and retail and therefore the two sides of the building were not symmetrical at ground floor. On the presumption that a banking use is unlikely to return to the site the creation of an entirely retail, i.e. “shopfront” character is supported subject to design and materials.
- 8.7 The proposal reinstates the original oeil du boeuf at entresol level, and the lantern to the main door bay, and the console-pedimented doorcase to the south entrance, which are welcomed as a considerable enhancement and result in this part of the scheme being considered favourably in heritage terms.
- 8.8 The principle of thermally upgrading the windows to double glazing is supported. The windows should replicate or retain the historic detailing of the glazing bars and frames. Double glazing may be challenging on the leaded windows, and a secondary glazed option is likely to be needed. Further details of the windows are required by condition.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant 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. Construction work impacts are also relevant but dealt with in the ‘Transport’ section. The thrust of the policies is that the quality of life of current

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

9.2 The applicant has prepared a Daylight and Sunlight Report. The following properties were tested:

- Hexagon Apartments, Parker Tower.
- Apartments 1-7, Parker Tower.
- 58 Parker Street.
- St. Anselm and St Cecelia Church.
- 6 and 7 Great Queen Street.
- Middle Eight Hotel, 66 Great Queen Street.

9.3 The results of which show that all of the residential windows and rooms assessed would comply with the BRE guidelines for daylight using the Vertical Sky Component and No Sky Line tests. Accordingly, the development will not cause any noticeable reductions to the daylight received to the neighbouring properties.

9.4 Where neighbouring rooms are served by at least one window orientated within 90-degrees of due south, all would comply with the BRE guidelines for both annual and winter sunlight.

Noise impacts

9.5 The proposal includes installing Air Source Heat Pumps (ASHPs) and air conditioning units.

9.6 A Plant Noise Assessment, in accordance with BS 4142, has identified the lowest background noise level as being 65 Db(A) and the maximum acceptable noise levels that the proposed plant equipment may emit during both the daytime and nighttime periods. The report concludes that with the proposed mitigation measures, which includes an acoustic enclosure, the noise levels identified should ensure a low likelihood of an adverse impact on amenity.

9.7 The Council's Environmental Health Noise Pollution Officer has reviewed the submitted Plant Noise Assessment and has confirmed that the proposals are considered acceptable. The plant can comply with the development plan policies with regards to noise and vibration subject to conditions. Condition 5 will require installation of anti-vibration measures and condition 4 will ensure the cumulative sound level from building services and fixed plant is lower than existing background noise levels by 10dB(A), and by 15dB(A) where the source is tonal, at the nearest residential receptor.

9.8 It is considered that these conditions would ensure that the amenity of neighbouring residents is protected in terms of noise and vibration from the proposed rooftop plant.

10. SUSTAINABILITY AND ENERGY

- 10.1 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.
- 10.2 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Energy (CO2 reduction beyond Part L 2013)

- 10.3 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), and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 10.4 As shown in Table 1 (below), the proposed refurbishment for the new use will reduce emissions by 73% compared to the Part L 2021 baseline, and the proposed energy efficiency measures will reduce emissions by 12% and 61%, as described in the 'Be Lean' and 'Be Green' results section.
- 10.5 Therefore, the scheme significantly exceeds the 35% carbon reduction target over Part L building Regulations as set out in the London Plan Policy SI2. The scheme also meets and exceeds Policy CC3 requirements from the Camden Local Plan 2017.

Energy and carbon summary

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

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	39.3%
Be lean stage (low demand): LP policy SI2	15%	18.9%
Heat Network/Active Savings (Be Clean)	0%	0%
Be green stage (renewables): CLP policy CC1	20%	25.2%

Table 1 - Carbon saving targets and the scheme results

Total carbon reductions

- 10.7 Reductions are measured against a baseline, the requirement set out in the Building Regulations. Major development should achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).
- 10.8 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 39.3% below Part L requirements, as shown in Table 1 above. A refurbishment scheme does not require a carbon offset payment to bring it to zero carbon.

Be lean stage (reduce energy demand) -

- 10.9 London Plan policy SI 2 sets a policy target of at least 15% reduction of carbon emissions beyond the Building Regulations baseline through reduced energy demand at the first stage of the energy hierarchy.
- 10.10 The development meets the policy target of 15%, reducing emissions by 18.9% at this stage. If the domestic hot water consumption is excluded from the calculation, the emissions savings obtained in the rest of the energy use from the efficiency measures, including measures such as energy-efficient lighting and ventilation at the Be lean stage, would be higher.
- 10.11 The applicant has submitted dynamic thermal modelling as part of the justification for proposing active cooling. The MVHR with air tempering principle is proposed to mitigate the risks of overheating. Considering the modelling results, it is accepted that active cooling is necessary on this site to meet the TM52 Thermal Comfort criteria.

Be clean stage (decentralised energy supply)

- 10.12 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 establishing a new network where this is not possible.
- 10.13 In this case, the existing London heat map has been assessed and demonstrated that no existing local networks are present within the scheme's connectable range.

Be green stage (renewables)

- 10.14 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.

10.15 In this case, the development exceeds the policy target of 20%, reducing emissions by 25.2% at this stage through renewables in compliance with the development plan. The proposal also includes low-carbon heating like air-source heat pumps (ASHPs) and details are secured by condition.

Be seen (energy monitoring)

10.16 The London Plan policy SI 2 requires monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting, which would be secured as part of the S106 agreement.

Sustainability (BREEAM)

10.17 A BREEAM Pre-Assessment has been carried out, showing that all main targets are met and exceeded per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an 'Excellent' rating).

10.18 The proposal currently achieves a score of 72.44%, which equates to an 'Excellent' rating. The Pre-Assessment report shows that:

- Energy - 15 out of 25 credits are achieved, which equates to 60% with a target of 60%;
- Water - 6 out of 8 credits are achieved, which equates to 75%, with the target being 60%;
- Materials - 11 out of 13 credits are achieved, which equates to 84.6%, with the target being 40%

10.19 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.

Climate change adaption and sustainable design

10.20 The proposal incorporates water-efficient design measures to minimise on-site water consumption. A condition would secure the water usage target of 105 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.

10.21 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible.

10.22 The development proposals do not incorporate any increase in hardstanding areas. Runoff rate restriction has been restricted as close as reasonably

practicable to greenfield rates. A drawing and explanation are provided for how exceedance flows will be managed.

- 10.23 The applicant has provided calculations showing that there is no flooding on site in the 1 in 100 year +40% climate change event, indicating that the site can also manage the 1 in 30 and 1 in 100-year events appropriately.
- 10.24 The applicant still needs to provide details of the owner of the maintenance of the drainage features. Full details of the owner of the maintenance of the sustainable drainage system, including the blue and green roofs, would be secured by condition.

Summary

- 10.25 The proposal satisfies policy objectives by optimising sustainability by incorporating best practice design, construction, and operation measures. Based on the above, it is considered the proposals accord policy and guidance regarding sustainability matters and is therefore acceptable in terms of sustainability.

11. AIR QUALITY

- 11.1 The applicant has prepared an assessment of the air quality impacts associated with the proposed development's construction and operational phases.
- 11.1 The building currently passes the AQ Neutral Transport and Building emissions assessment. No new parking is proposed, and the impact on traffic activity is expected to be small; therefore, the transport emissions are considered air quality neutral. The proposals air quality neutral assessment shows that the proposed development will fully meet transport and building emissions requirements.
- 11.2 The air quality assessment shows that the proposed development will not introduce new sensitive receptors into an area where the UK air quality objectives are exceeded by the proposed opening year.
- 11.3 The results of the dust risk assessment indicate that construction activities, at worst, have a 'Medium' risk for demolition, and "Low" risk of dust soiling, and a 'Negligible' risk of health effects from PM10 at nearby receptors without mitigation. These impacts can be minimised through the implementation of appropriate mitigation measures. With mitigation in place, residual dust effects from construction will be minimal and are considered to be not significant.
- 11.4 Air quality impacts from construction and operational traffic are considered to be negligible due to the expected low number of vehicle movements during these phases of the proposed development.

11.5 A condition is recommended to ensure that the ventilation strategy protects the amenity of the residents. The condition requires the submission of details of the mechanical inlet locations.

11.6 Overall, it is judged that the proposed development is consistent with Paragraph 180 of the NPPF, being appropriate for its location regarding its effects on the local air quality environment. The proposed development is compliant with Camden Council Local Plan as well as with Policy SI1 of the London Plan.

12. TRANSPORT

12.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.

12.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

12.3 It is the Council's intention to transform Holborn into a place for people with attractive, healthy, accessible, and safe streets for everyone, and ensure getting around by sustainable and healthy types of transport is easier and faster. This is being progressed through the Holborn Liveable Neighbourhoods project creating ideas such as widening pavements, making some areas car free, improving cycle routes, adding public spaces and plants and trees.

12.4 In terms of the wider context, [Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.

12.5 CTS priorities include:

- increasing walking and cycling;
- improving public transport in the Borough;
- reducing car ownership and use;
- improving the quality of our air; and
- making our streets and transport networks safe, accessible, and inclusive for all.

Parking including car-free

12.6 Policy T2 seeks to limit parking availability and require all new developments in the borough to be car-free.

12.7 The new hotel would be secured as car-free through a section 106 legal agreement, restricting the hotel from obtaining any on-street parking permits in connection with the development.

Disabled car parking

12.8 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential developments should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

12.9 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'.

12.10 Therefore, an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site is required.

12.11 Officers expect the vast majority of staff and visitors to travel to the site by sustainable modes of transport. However, there is the 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. This would put pressure on infrastructure, which has been provided primarily for local stakeholders. Officers, therefore, suggest that an additional EVCP (fast charger on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policies A1 and T1 if planning permission is granted.

CPZ Review

12.12 In 2023, a review of the CTS was undertaken and a delivery plan set out for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). This committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:

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

12.13 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This can potentially increase on-street parking pressure, which may drive demand for CPZ reviews. Considering the proposed development's scale and location, it is appropriate to request a contribution of £15,000 towards the CA-D CPZ review, which will likely take place in 2025/26.

Coach parking and taxis

12.14 We would be concerned over 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 Kingsway and other streets near the site. The applicant has agreed to a planning obligation to be secured by legal agreement stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, following Camden Local Plan Policy E3 (paragraph 5.60).

12.15 A taxi bay with space for three vehicles is located on Great Queen Street, approximately 80m from the hotel entrance. Taxis could also lawfully stop adjacent to the site on Great Queen Street to pick up or drop off passengers.

Cycle parking

12.16 The Council requires high-quality cycle parking to be provided in accordance with Local Plan Policy T1, London Plan Policy T5 (1 space per 20 bedrooms long-stay and 1 space per 50 bedrooms short-stay), CPG Transport, and the London Cycling Design Standards (LCDS).

12.17 The current site does not include any dedicated cycle parking spaces. A dedicated long-stay cycle store is proposed at basement level with access proposed from Parker Street. A dedicated cycle store able to accommodate 5 long-stay and 8 visitor cycle parking spaces using a two-tier cycle parking stands is proposed to be provided at the basement level. Given the constraints of the existing building, cycle parking would only be accessible via the stairs from the ground floor level, with a cycle ramp provided. Whilst this is not strictly in line with the policy, it is a considerable improvement in relation to the existing situation and is therefore considered acceptable and is secured by condition.

12.18 The cycle parking proposals comply with Local Plan Policy T1 and London Plan Policy T5.

Trip generation

12.19 Table 6.7 presented in the TA and reproduced here, shows the anticipated total person trip rates for the proposed development.

Mode of Travel	AM Peak Hour (08:00-09:00)	PM Peak Hour (17:00-18:00)	Daily (07:00-19:00)
Underground / DLR	5	7	92
Overground	1	1	6
National Rail	2	3	46
Bus, minibus or coach	1	2	23
Motorcycle, scooter or moped	0	0	2
Driving a car or van	1	0	6
Car / Taxi Passenger	1	1	32
Bicycle	0	1	3
On foot	8	14	144
Total Person Trips	18	29	353

12.20 Table 6.6 of the TA shows the anticipated total trip generation of the office use based on square metres.

Mode of Travel	AM Peak Hour (08:00-09:00)	PM Peak Hour (17:00-18:00)	Daily (07:00-19:00)
Underground / DLR	20	16	129
Overground	1	2	22
National Rail	0	1	14
Bus, minibus or coach	21	18	192
Motorcycle, scooter or moped	0	0	1
Driving a car or van	0	0	4
Car / Taxi Passenger	1	0	9
Bicycle	0	1	10
On foot	17	21	271
Total Person Trips	62	61	649

12.21 The tables show a reduction in two-way personal movements, with between 32 and 43 fewer movements during each peak hour and 296 fewer two-way person movements daily. Whilst the trip generation between the two uses shows a decline in the number of trips, it is noted that the building has been completely vacant since December 2022 and has not been fully occupied since at some point before 2019. Therefore, the transport impacts in real terms are not represented in the trip generation analysis. The marketing evidence shows that the site has not been fully occupied as an office for a long period and has little prospect of being occupied. Therefore, this is given weight in the consideration of the transport impacts and associated contributions.

12.22 Most trips are projected to be taken by public transport and active travel. The anticipated high volume of the walking trips is likely to be made from London Underground station at Holborn, the bus stop on Kingsway, and commercial, entertainment, shopping, and restaurant venues in Holborn. Considering the increase in active travel to and from the site, the applicant will be requested

to provide a financial contribution towards the Holborn Liveable Neighbourhood (HLN) project and cycle and pedestrian safety improvements on High Holborn. The pedestrian, cycling and environmental improvements contribution is discussed under 12.38 below.

Highways works

- 12.23 It is felt that significant damage to the public highway is unlikely during demolition and construction. A legal agreement secures a highway contribution of £20,000.

Travel planning

- 12.24 A Framework Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel are set at 4.2%. The applicant is requested to achieve at least a 5% increase in modal shift for walking and cycling.
- 12.25 A legal agreement will secure a Travel Plan covering an associated monitoring and measures contribution of £11,348.

Managing and mitigating the impacts of construction

- 12.26 Construction management plans demonstrate how developments will minimise impacts from moving goods and materials during the construction process (including any demolition works). A Construction Management Plan was submitted; however, the document does not adhere to the Council's guidance.
- 12.27 The site is located on Kingsway, which forms part of the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.
- 12.28 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the construction's impacts on the transport network. The site is within the Cumulative Impact Area (CIA), where Saturday work is not permitted unless agreed with Camden Council.

- 12.29 A more detailed CMP document will also be secured by legal agreement in accordance with Local Plan Policy A1. This should be prepared using the Council's CMP proforma.
- 12.30 Implementation support contributions of £10,116 and construction impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1.
- 12.31 The contractor must register the works with the Considerate Constructors Scheme and adhere to the CLOCS standard for Construction Logistics and Community Safety.

Servicing

- 12.32 Local Plan Policy A1 seeks to manage the impact of development by transport impacts such as servicing. Policy A4 states that conditions will usually be applied to require servicing to take place between the hours of 08:00 to 20:00. Developments requiring deliveries outside of these times will need to demonstrate there will be no adverse impact in an acoustic report. Policy T4 requires developments of over 2,500 sqm that are likely to generate significant movement by road to provide a Delivery and Servicing Plan. While the development is under this threshold and not expected to generate significant movements, a draft Delivery and Servicing Plan accompanies this application, which would be secured by legal agreement.
- 12.33 Servicing will remain in line with the existing arrangements. There are two formal inset loading bays of approximately 14 metres in length located close to the site on Parker Street, including one bay adjacent to the site on the northern side of Parker Street. Deliveries for the retail unit would take place from the main entrance at Kingsway/Great Queen Street.
- 12.34 The number of service vehicle trips is anticipated to reduce compared to the existing office use. Site management will liaise with occupiers to manage the arrival of deliveries, aiming to avoid deliveries during peak hours on the highway network and peaks in delivery activity on site.

Pedestrian, cycling and environmental improvements

- 12.35 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which planning conditions cannot mitigate. New developments place pressure on the existing infrastructure and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough.
- 12.36 The Council is developing proposals which will transform the public realm in the area and enhance the attractiveness of many streets for pedestrians and

cyclists. Considering the anticipated high increase in cycle and walking trips generated by the proposed development, and further promoted by the Travel Plan, we will seek a financial contribution of £28,000 towards:

- HLN project, specifically
- improving the look and feel of the Great Queen Street area,
- upgrading the road and pavement materials and evaluating parking and loading, wider pavements, and Cycleway 52 upgrades on Newton Street,
- relocating the kiosks outside Holborn Station, adding plants and trees, and getting rid of un-needed street clutter,
- cycle and pedestrian safety improvements on High Holborn.

12.37 This contribution would be secured by S106 legal agreement.

Micromobility improvements

12.38 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 STAL analysis shows grades between 2 and 5 throughout the area, which indicates improvement opportunities, considering our aspiration (and target) for the STAL score to be 6b. Officers anticipate significant demand for more shared mobility parking bay capacity to be provided in the area should planning permission be granted. A contribution of £2,00 for micromobility improvements would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for parking dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

Summary

12.39 Overall, the proposal is acceptable in terms of transport implications. It is car-free and is located in a highly sustainable and accessible location that is in line with planning policy. The proposal will not generate a significant level of vehicular traffic and, as such, will not significantly impact the capacity of the surrounding highway network. Conveniently accessible long-stay and short-stay cycle parking would be provided. The impacts of the scheme will be mitigated by contributions which support the use of sustainable modes of transport.

13. REFUSE AND RECYCLING

- 13.1 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.
- 13.2 Bins for the Aparthotel will be stored in a dedicated waste store in the basement. Bins will be moved from the basement waste store to ground floor level by the onsite management team by way of a hoist.
- 13.3 A waste presentation area will be provided at ground floor level, adjacent to Parker Street, to provide for the temporary storage of waste prior to collection. Smaller deliveries to the aparthotel would be undertaken via the main entrance at Kingsway/Parker Street.
- 13.4 Waste for the retail unit will be stored within the unit and moved on-street for daily collection.
- 13.5 Refuse collection for the aparthotel will be undertaken from Parker Street, while refuse collection for the retail outlet is expected to be from Great Queen Street.

14. FIRE SAFETY

- 14.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 14.2 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.

- 14.3 The application is accompanied by a “Fire Safety Statement” document outlining the critical fire safety features incorporated within the development. The submitted document has been prepared by Fire Safety Statement and prepared by Semper, a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures.
- 14.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5 and a condition ensures that the fire strategy is implemented in accordance with the approved report.

15. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 15.1 Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to secure a successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents and recognise the importance of other employment-generating uses, including retail, education, health, markets, leisure and tourism. The Council’s Inclusive Economy Team have been consulted on the application, and their comments are incorporated below.
- 15.2 The Council will expect developers to assist with training and employment initiatives via section 106 agreements where the development impacts the availability of jobs for Camden residents. The Council will expect schemes of 1,000 (GIA) or larger to provide employment or training initiatives secured through a section 106 agreement with the Council unless evidence demonstrates that the scheme is below the £3m build cost trigger.
- 15.3 In this case, the build costs are estimated at £21.576 million. The applicant must recruit 7 construction apprentices paid at least a London Living Wage and pay the council a support fee of £12,226.4 (£1,700 per apprentice as per section 63 of the Employment sites and business premises CPG). The construction apprenticeships and contributions would be secured through a s106 legal agreement.
- 15.4 The council may seek a financial contribution to assist residents in receiving training in the skills that would enable them to access the jobs created by the new development. This contribution will be held by the Council and used to support activities that create or promote opportunities for employment or training.
- 15.5 Approximately 29 full-time jobs would be created during the operational phase. This is calculated as the number of bedrooms (58) x 0.5 [number of employees per bedroom] = 29 full-time jobs created.

- 15.6 The training and skills payment of £8,515.34 is calculated as follows. $29 \times 21\%$ [% of Camden residents who work in Camden] $\times 35\%$ [% of employees requiring training] $\times \pounds 3,995$ [£ per employee requiring training] = £8,515.34
- 15.7 Regarding Construction Work Experience Placements, there is an expectation for the applicant to provide a set number of work experience placements (being one placement per 500m² of employment floorspace) of not less than 2 weeks each, to be undertaken throughout the development, and to be recruited through the Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG. The hotel provides 3,486 sqm C1 floorspace, equating to 7 construction work experience placements. The applicant has agreed to 7 construction work experience placements, which will be secured through a section 106 legal agreement.
- 15.8 Regarding Local Recruitment, Camden's standard local recruitment target is 20%. The applicant should work with the Euston Skills Centre to recruit for vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 15.9 Regarding Local Procurement, the applicant would also sign up for the Camden Local Procurement Code (to be secured as part of the section 106 legal agreement), as per section 61 of the Employment Sites and Business Premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction contract. Spending a significant proportion of the total construction build cost on supplies/suppliers and sub-contractors within the Camden borough area will support local businesses and the overall functioning of the local economy.
- 15.10 The proposal also presents opportunities to secure end-use / occupation phase benefits. In this regard, a Section 106 legal agreement would secure 3 x end-use apprenticeships (rolling term) for the hotel operation.
- 15.11 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
 - 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

16. BIODIVERSITY NET GAIN AND BIODIVERSITY

- 16.1 Based on the information available, this permission will not require the approval of a Biodiversity Gain Plan before development is begun because

it is below the de minimis threshold, meaning it does not impact an onsite priority habitat and impacts less than 25sqm of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of linear habitat.

- 16.2 The Urban Greening Factor score is 0.04 which is below the target of 0.4, with limited areas available for enhancement.

17. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 17.1 The proposed development is liable for both Mayoral and Camden CIL. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule:

Mayor CIL2

Hotel - £140 sqm (Central London and Isle of Dogs)

Camden

Hotel - £110 sqm (Zone A – Central)

- 17.2 The CIL figures would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

18. CONCLUSION

- 18.1 The application is for change of use and extension of the existing office building at Kingsway House, 99-103 Kingsway, WC2B 6QX, to a Class C1 apart-hotel use with the ground floor retained as flexible Class E commercial space.
- 18.2 This application meets the policy tests of LBC LP Policy E2, which seeks to protect existing employment space within the borough. The near year-long marketing evidence prior to the submission of the application, the void period at the site, market trends in the area, and the attempt to refurbish the site for continued business use demonstrate a lack of market demand. The site has been unable to attract prospective office tenants or a single serious inquiry in its most recent marketing period.
- 18.3 The London Plan and Local Plan support the delivery of visitor infrastructure within the Central Activities Zone, which is near many destinations and attractions.
- 18.4 The proposed extensions are similar to those approved at the site in 2017. The extensions respect the form and character of the host building and preserve the character and appearance of the Kingsway Conservation Area.
- 18.5 Including on-site housing would not represent efficient development due to the limited residential area. Once the provision of ancillary facilities and circulation space has been factored in, the remaining floorspace would

equate to only one unit. The provision of one unit would be impractical with the apart hotel use and harm the function and quantum of the hotel. It would make the floorplate configuration less efficient, resulting in a less-than-optimum use of the site in land use terms.

- 18.6 The proposed high-quality and sustainable aparthotel will bring a vacant building into use. The proposal will enhance and optimise the buildings' environmental performance by retaining and upgrading the building fabric and services strategy within the building envelope as part of a retro-first approach to minimising embodied and operational carbon.
- 18.7 Also, the development would not result in undue harm to neighbouring amenity, the local transport network, or infrastructure subject to the recommended conditions and S106 obligations.
- 18.8 Paragraph 10 of the NPPF states that there is a presumption in favour of sustainable development. The dimensions of sustainable development are economic, social, and environmental, and they should be sought jointly. The proposed development would result in benefits through all three strands of sustainable development without any adverse impacts significantly or demonstrably outweighing them. The proposal is considered to be a favourable sustainable development in accordance with relevant national and regional policy, the Camden Local Plan, Camden Planning Guidance, and other supporting policy guidance.

19. RECOMMENDATION

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

Payment in lieu of housing

- Payment of £156,000

Energy and sustainability

- Energy Plan
- Sustainability plan (BREEAM compliance) – secure BREEAM Excellent rating (Overall score of 72.64%, 83% for Energy, 100% for Water, 53.8% for Materials)

Transport

- Car-free development
- Travel Plan and associated monitoring and measures contribution of £11,348.
- Off-site contribution of £4,000 for a disabled parking space.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.

- CA-D CPZ review contribution of £15,000.
- No coach party bookings and a ban on customers being picked up or dropped off by the coach at any time outside the hotel.
- Construction management plan (CMP) CMP implementation support contribution of £10,116 and CMP Impact Bond of £16,000.
- Highway works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £28,000.
- Micromobility improvements contribution of £2,000.
- Delivery and Servicing Management Plan

Employment and training

- Payment for loss of employment generating use £184,569
- Payment for local skills and training of £8,515
- 3 x end-use apprenticeships (rolling term) for the hotel operation.
- 7 construction apprentices paid at least a London Living Wage plus a support fee of £12,226.4
- 7 construction work experience placements recruited through the Euston Skills Centre
 - Joining the Council’s Inclusive Business Network and promoting this and good employment practice to occupiers
 - 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

20. LEGAL COMMENTS

20.1 Members are referred to the Legal Division's note at the Agenda's start.

21. CONDITIONS PLANNING PERMISSION

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p>

Supporting documents:

Covering Letter 14 August 2024, CIL Form 14 August 2024, Site Location Plan (Scale 1:1250) 6 February 2024, Design & Access Statement Studio Moren 13 August 2024, Planning & Heritage Statement Montagu Evans 14 August 2024, Marketing and Loss of Employment Report Bluebook 9 August 2024, Construction Management Plan Elliot Wood 12 August 2024, Daylight and Sunlight Assessment Consil 17 July 2024, Ecology & Biodiversity Statement Hilson Moran 22 July 2024, Energy & Sustainability Strategy (Incl. Overheating Assessment & BREEAM) Hilson Moran 26 July 2024, Acoustic Report Hilson Moran 26 July 2024, Air Quality Assessment Hilson Moran 17 July 2024, Transport Assessment (Incl. Delivery & Servicing) Elliot Wood 6 August 2024, Travel Plan Elliot Wood 5 August 2024, Sustainable Drainage Systems Strategy Elliot Wood 19 July 2024, Tree Survey/ Arboricultural Assessment GHA Trees 3 June 2024

Existing:

A 025 099 P1 Existing Basement Plan, A 025 100 P1 Existing Ground Floor Plan, A 025 101 P1 Existing First Floor Plan, A 025 102 P1 Existing Second Floor Plan, A 025 103 P1 Existing Third Floor Plan, A 025 104 P1 Existing Fourth Floor Plan, A 025 105 P1 Existing Fifth Floor Plan, A 025 106 P1 Existing Sixth Floor Plan, A 025 107 P1 Existing Seventh Floor Plan, A 025 108 P1 Existing Roof Plan, A 025 150 P1 Existing Elevations Sheet 1 of 2, A 025 151 P1 Existing Elevations Sheet 2 of 2

Demolition:

A 050 099 P1 Demolition Basement Plan, A 050 100 P1 Demolition Ground Floor Plan, A 050 101 P1 Demolition First Floor Plan, A 050 102 P1 Demolition Second Floor Plan, A 050 103 P1 Demolition Third Floor Plan, A 050 104 P1 Demolition Fourth Floor Plan, A 050 105 P1 Demolition Fifth Floor Plan, A 050 106 P1 Demolition Sixth Floor Plan, A 050 107 P1 Demolition Seventh Floor Plan, A 050 108 P1 Demolition Eighth Floor Plan

Proposed:

A 100 001 P1 Proposed Site Plan, A 100 099 P1 Proposed Basement Plan, A 100 100 P1 Proposed Ground Floor Plan, A 100 101 P1 Proposed First Floor Plan, A 100 102 P1 Proposed Second Floor Plan, A 100 103 P1 Proposed Third Floor Plan, A 100 104 P1 Proposed Fourth Floor Plan, A 100 105 P1 Proposed Fifth Floor Plan, A 100 106 P1 Proposed Sixth Floor Plan, A 100 107 P1 Proposed Seventh Floor Plan, A 100 108 P2 Proposed Eighth Floor Plan, A 100 109 P1 Proposed Roof Plan, A 100 150 P2 Proposed Elevations, A 025 151 P2 Proposed Elevations, A 025 152 P2, Proposed Sections AA and BB

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

3	<p>Materials to Match Existing</p> <p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>External Noise levels</p> <p>The external noise level emitted from plant, machinery or equipment at the development 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 and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
5	<p>Anti-vibration isolators and fan motors</p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration-isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
6	<p>SuDS: Construction in accordance with details</p> <p>The sustainable drainage system as approved Sustainable Drainage Strategy 19/7/24 by Elliot Wood shall be installed as part of the development 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 to achieve a runoff rate of no more than 10.4l/s. The system shall include blue roof of 6.1m³, as stated in the approved drawings. Full details of the owner of the maintenance of the sustainable drainage system, including the blue and green roofs, shall be submitted to, and approved in writing by the local planning authority and shall thereafter retained and maintained in accordance with the approved maintenance plan.</p>

	<p>To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
7	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
8	<p>Mechanical ventilation</p> <p>Prior to commencement of above ground development, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1</p>
9	<p>Cycle parking</p> <p>The cycle facility at basement level to accommodate 5 long-stay and 8 visitor cycle parking spaces using a two-tier cycle parking shall be provided in its entirety prior to the first occupation of any of the new hotel rooms, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
15	<p>No active cooling</p> <p>Details of air source heat pumps and ventilation</p>

	<p>Prior to commencement of development, full details of Air Source Heat Pumps (ASHPs) and any mechanical ventilation shall be submitted to and approved by the local planning authority. The measures shall be fully provided in accordance with the approved details and thereafter retained and maintained in accordance with the approved scheme, and no other system of active cooling shall be implemented.</p> <p>Reason: In order to minimise energy consumption and following the energy and cooling hierarchies, in accordance with policies CC1, CC2, D1 of the Camden Local Plan 2017</p>
	<p>Design details</p> <p>Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <p>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills, external doors and gates;</p> <p>b) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the new shopfronts at a scale of 1:10;</p> <p>c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) (can be high resolution photographs) and samples of those materials (to be provided on site).</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
16	<p>Premises to only be used as hotel</p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall not be used other than as a hotel within a single planning unit.</p> <p>Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan (2017).</p>

17	<p>Number of hotel bedrooms</p> <p>The development hereby permitted shall not comprise more than 58 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.</p> <p>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).</p>
18	<p>Waste and recycling storage to be implemented</p> <p>The waste and recycling storage shown on the approved plans and shall be provided prior to the commencement of the use hereby permitted, and shall thereafter be retained in perpetuity.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the in accordance with policies CC5, D1 and D2 of the Camden Local Plan 2017.</p>
19	<p>Fire safety</p> <p>The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by Fire Safety Statement, prepared by B-First Fire Safety dated 13.08.2024</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.</p>
20	<p>The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:</p>

	<p>Provide details of change in building loads and assessment of associated ground movement impact on LU structures and tunnels due to demolition, construction, temporary works, cranes and other heavy vehicles and plant. The ground movement assessment report should describe predicted impacts and proposed measures to protect LU assets from direct or indirect damage;</p> <p>a) Provide detailed design and RAMS on the use of tall plant/scaffolding/lifting equipment;</p> <p>b) Details of changes to lift shaft</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>
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22. INFORMATIVES PLANNING PERMISSION

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
2	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at 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)</p>

	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
5	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
6	<p>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.</p>
7	<p>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.</p>
8	<p>Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "http://nrmm.london/".</p>

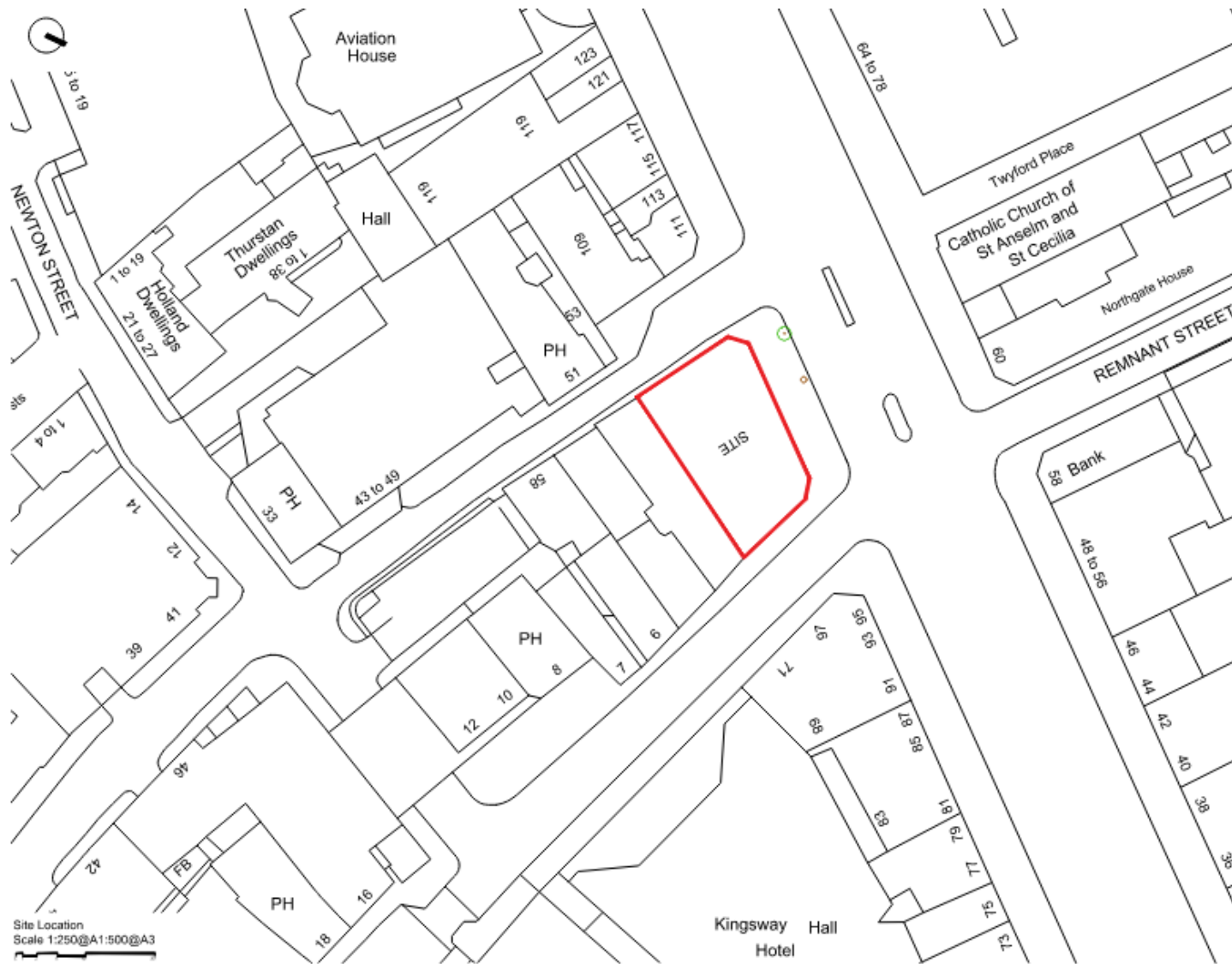
9	<p>We recommend that hotel bedrooms shall be designed and located such that the unoccupied noise levels do not exceed the criteria specified in Table H.1 Airborne Sound Insulation and Table H.3 Indoor ambient noise level ranges for hotel bedrooms of BS8233:2014.</p>
10	<p>Biodiversity Net Gain (BNG) Informative:</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 (“1990 Act”) is that planning permission granted in England is subject to the condition (“the biodiversity gain condition”) that development may not begin unless:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and</p> <p>(b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>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.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat)</p>

Planning Committee

12th December 2024

2024/3493/P
Kingsway House
103 Kingsway
London
WC2B 6QX

Change of use of existing building from commercial use (Class E) to apart hotel use (Class C1), extension and remodelling of upper storeys to accommodate further Class C1 apart hotel floorspace, including new 8th floor, provision of ancillary facilities and retention of Class E commercial unit at ground floor level and associated works including refurbishment of façade.



Aerial views of the site





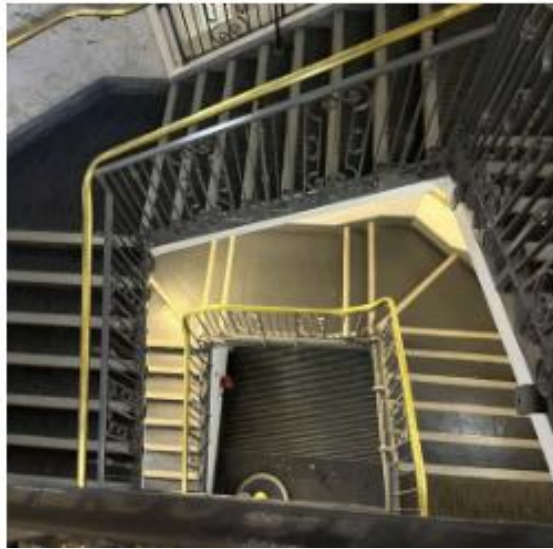
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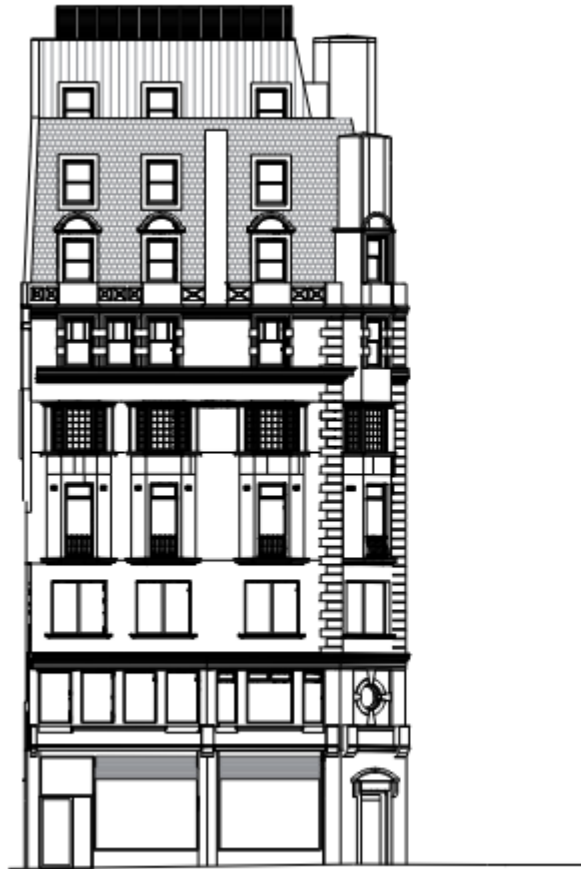


04



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01 Elevation 01



02 Elevation 02

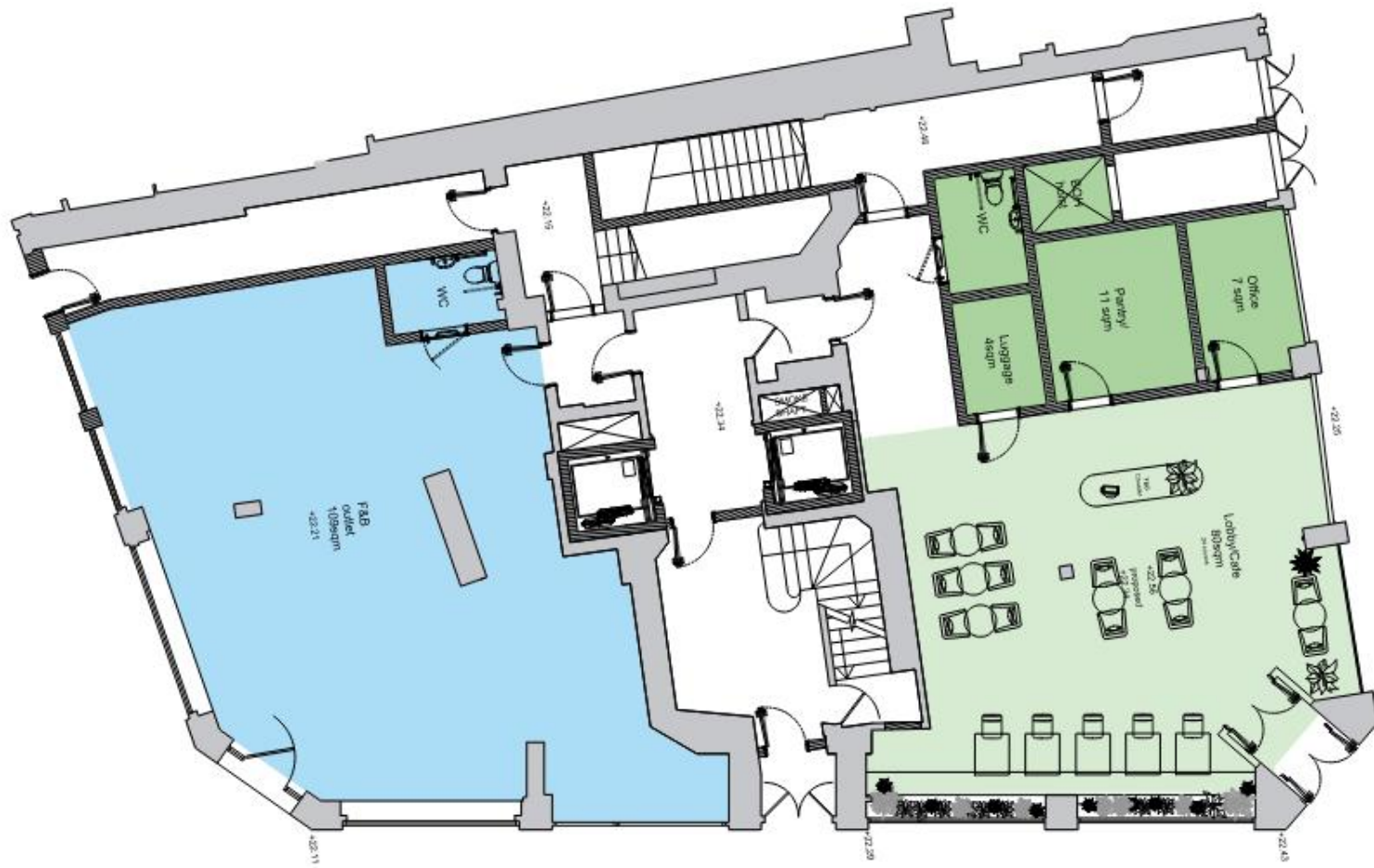


8th Floor Plan



lan





ground Floor Plan

