

<b>Address:</b>	293-299, 301-305 Kentish Town Road and 8 Holmes Road London NW5 2TJ		<b>1</b>
<b>Application Number(s):</b>	2024/4116/P	Officer: Daren Zuk	
<b>Ward:</b>	Kentish Town South		
<b>Date Received:</b>	24/09/2024		
<b>Proposal:</b>	Change of use of part ground and first floors and full second and third floor levels from offices (Class E) to hotel accommodation (Class C1). Installation of rooflights and PV solar panels at rear roof level.		

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

Existing Drawings:

2305-LAT-XX-00-M2-A-P10002, 2305-LAT-XX-00-DR-A-10100,  
2305-LAT-XX-00-DR-A-10101, 2305-LAT-XX-00-DR-A-10102, 2305-LAT-XX-00-DR-A-10103, 2305-LAT-XX-00-DR-A-10104, 2305-LAT-XX-00-M2-A-10201, 2305-LAT-XX-00-M2-A-10202, 2305-LAT-XX-00-M2-A-10203, 2305-LAT-XX-00-M2-A-10204, 2305-LAT-XX-00-M2-A-10205, 2305-LAT-XX-00-M2-A-10206, 2305-LAT-XX-00-M2-A-10301, 2305-LAT-XX-00-M2-A-10302, 2305-LAT-XX-00-M2-A-10303

Proposed Drawings:

2305-LAT-XX-00-DR-A-15100-S4-P2, 2305-LAT-XX-00-DR-A-15101-S4-P2,  
2305-LAT-XX-00-DR-A-15102-S4-P2, 2305-LAT-XX-00-DR-A-15103-S4-P2,  
2305-LAT-XX-00-DR-A-15104-S4-P2, 2305-LAT-XX-00-DR-A-15105-S4-P2  
2305-LAT-XX-00-M2-A-15201-S4-P2, 2305-LAT-XX-00-M2-A-15202-S4-P2,  
2305-LAT-XX-00-M2-A-15203-S4-P2, 2305-LAT-XX-00-M2-A-15204-S4-P2,  
2305-LAT-XX-00-M2-A-15205-S4-P2, 2305-LAT-XX-00-M2-A-15206-S4-P2,  
2305-LAT-XX-00-M2-A-15301-S4-P2, 2305-LAT-XX-00-M2-A-15302-S4-P2,  
2305-LAT-XX-00-M2-A-15303-S4-P2, 2305-LAT-XX-00-M2-A-15304-S4-P2

Supporting Documents:

Design and Access Statement (prepared by Latitude, undated); Planning Statement (prepared by Newsteer, dated September 2024); Marketing Evidence (prepared by BBG, dated 20 September 2024); Hotel Market Assessment (prepared by Savills, dated 17 December 2024); Energy and Sustainability Statement (prepared by Consult JA Ltd., dated August 2024); Transport Assessment (prepared by Caneparo Associates, dated July 2024); Draft Delivery Servicing and Waste Management Plan (prepared by Caneparo Associates, dated July 2024); Draft Construction Management Plan (prepared by Caneparo Associates, dated July 2024); Hotel Operational Management Plan (prepared by CA, undated); Fire Statement (prepared by Vemco, dated July 2024)

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

<b>Applicant:</b>	<b>Agent:</b>
Create Reit Commercial Ltd.	Newsteer 20 Farringdon Street London EC4A 4AB

**ANALYSIS INFORMATION**

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Commercial, business and service	1763.7	0	-1763.7
C1	Hotel	0	1763.7	+1763.7

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

**EXECUTIVE SUMMARY**

- i) The application seeks a change of use of the existing office (Class E) building at 293-299, 301-305 Kentish Town Road & 8 Holmes Road to a hotel (Class C1), providing 74 bedrooms. The proposal also include installation of rooflights and PV panels to the main roof.
- ii) The application meets the policy tests of Local Plan Policy E2, which seeks to protect existing employment space within the borough. The over two 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 during the marketing period.

- iii) The London Plan and Local Plan support the delivery of visitor infrastructure within town centre locations such as this, and nearby destinations, attractions, and transport links.
- iv) The proposed hotel will bring a vacant building back into use, re-providing employment opportunities in a key area of the Borough. Additional employment benefits have been negotiated including apprenticeships during the construction phase, construction work experience placements, and local recruitment and procurement.
- v) 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.
- vi) The development would not result in undue harm to neighbouring amenity, the local transport network, or infrastructure subject to the recommended conditions and S.106 obligations.

## 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 The subject site comprises of three interconnecting buildings located at 293-299 and 301-305 Kentish Town Road and 8 Holmes Road. The building has a lawful Class E use (Commercial, business, and service) with the ground floor and a portion of the first-floor accommodating retail and restaurant floorspace, and the upper floors being utilised for office use. The upper floors of the building (part first, full second, and full third floor levels) are currently vacant.
- 1.2 The site is located on the east side of Kentish Town Road, at the junction with Holmes Road. Although the majority of the building fronts Kentish Town Road, the upper levels of the building which form part of this application, take access from Holmes Road.
- 1.3 The site has a Public Transport Accessibility Level (“PTAL”) of 6b, the highest rating achievable. It is a short walk from Kentish Town Underground and National Rail Station.
- 1.4 The surrounding site includes many uses, including high street commercial and retail offerings, offices, light industrial, and residential.
- 1.5 The site is included within the boundary of the recently adopted (10 March 2025) Regis Road Area Guidance Supplementary Planning Document. The document outlines emerging context changes and is a material consideration in the determination of planning applications in the area.



Figure 1. Subject site, as seen from Kentish Town Road.

## 2. THE PROPOSAL

- 2.1 The proposal includes the change of use of a small portion of the ground floor (Holmes Road entrance), a portion of the first floor, full second, and full third floor levels from office (Class E) into a hotel (Class C1).
- 2.2 The existing floors subject to the change of use have a GIA of 1763.7sqm. The proposals include a 74-room hotel on three floors. Access to the hotel will be taken from Holmes Road, where the existing office entrance is located. The hotel will be a micro-room style hotel, with minimal guest amenities. The existing retail and commercial businesses at ground floor level (and part first floor) are not included in the application.
- 2.3 Minor external alterations include changes to the rear elevation fenestration, as well as installation of rooflights and PV panels on the main roof.

## 3. RELEVANT HISTORY

### ***293-299 Kentish Town Road***

- 3.1 **8500404** – The change of use of the first floor from offices to restaurant and take-away with ancillary staff storage and office facilities. As shown in drawing 9172. **Granted 30/04/1985**
- 3.2 **9401904** – Change of use from office (Class B1) on part of 2<sup>nd</sup> floor to a residential flat (Class C3) within the meaning of the Town and Country Planning (Use Classes) Order 1987 as shown on drawing nos. A1 A2 A3 amended and as revised by letter dated 14th March 1995. **Granted 21/09/1995**

### ***301-305 Kentish Town Road***

- 3.3 **8500249** – Use of the 1st and 2nd floors from retail to a snooker club as shown on drawing nos. K TR 1P 2E P. **Granted 14/05/1985**
- 3.4 **2008/2151/P** – Change of use of ground floor unit facing Holmes Road from ancillary reception/storage use (Class B1) to a retail shop (Class A1). **Granted 30/09/2008**

## 4. CONSULTATION

### ***Local groups***

#### Kentish Town Neighbourhood Forum

- 4.1 An objection was received from the Kentish Town Neighbourhood Forum, covering the following issues(s):

## Transport

- Increased traffic impacts from pick up/drop off will cause increased traffic and congestion on Holmes Road, particularly when combined with food delivery drivers gathering outside McDonald's and the pub across the street which is yet to reopen (The Old Farmhouse).

*Officer response: An assessment of the transport impacts resulting from the proposal, including mitigation measures and planning obligations are outlined in Section 11 (Transport) of the report. Given the relatively small scale of the hotel and the anticipation that the vast majority of guests will not arrive by vehicle, the impacts to vehicular traffic on Holmes Road will be minimal.*

## Hotel Layout and Operations

- Concerns raised regarding the lack of internal circulation space in the entrance lobby which will lead to spilling out of guests during check in and check out impacting nearby residents.
- Due to the small room sizes, the hotel will attract single night stay guests, increasing the amount footfall.
- Noise of late arriving guests will negatively impact nearby residents, adding to the existing impact of two student residences on Holmes Road (Student Unite and Stay Club).
- Small reception lobby would be uncomfortable to hotel workers and lacks suitable facilities such as luggage storage.
- Design approach has been focused on maximising the number of rooms to the detriment of hotel workers and guests.
- Hotel room layout is convoluted and awkward and does not reflect a well-designed space.
- Ratio of windowless rooms to those with windows is unacceptable and will not provide high quality accommodation.
- Concerns regarding providing good room environments for guests.

*Officer response: An assessment of the internal layout of the proposed hotel mainly relates to the provision of suitable fire emergency egress and not directly related to the level of amenity or standard of accommodation that would be completed with a self-contained residential proposal. Whilst the proposed hotel rooms would be compact and some without windows, they are considered suitable for short terms use by visitors. Visitors to London have a wide choice of hotel accommodation, with some choosing not to sleep in a room without windows, while others may decide that it is suitable for their needs. There is no land use planning reason why that choice should be precluded.*

## Employment Impacts

- Concern over the loss of potential jobs due to the change of use.
- Reduction in the number of employees on site would result in negative impacts on the local economy.

*Officer response: An assessment of the impacts from the change of use are outlined in Section 7 (Land Use) of the report, specifically paragraphs 7.19 and 7.20 which outline the reasons why a hotel is suitable in this location including location on a commercial high street and access to transport links. Additional information, including applicable planning obligations and contributions, are outlined in Section 14 (Employment and Training Opportunities).*

### **Adjoining occupiers**

- 4.2 Two site notices were displayed, one the front of 8 Holmes Road and one along the east side of Kentish Town Road. The notices were displayed on 02/10/2024 until 26/10/2024.
- 4.3 Objections were received from at least 7 individuals. The objections received by the Council are on the Council's website. The key issues raised are:

## Land Use

- There is no demand for a hotel in this location.
- Proposed hotel would be a budget or hostel style accommodation which is not appropriate for the area.
- Already three hostels on Holmes Road, no need for more.
- The windowless rooms will have limited ventilation.
- Impact to existing commercial business operations.
- No feasibility on the market for a hotel in this location.

*Officer response: Please see Section 7 (Land Use) for an assessment on the suitability of a hotel in this location, specifically paragraphs 7.19 and 7.20 which outline the reasons why a hotel is suitable in this location including location on a commercial high street and access to transport links*

## Amenity

- Clients of the hotel will cause noise and disturbance to area residents.

*Officer response: Please see Section 9 (Impact on Neighbouring Amenity) for an assessment on the impact of the proposal on the amenity of neighbouring residents. Paragraph 9.5 specifically outlines that impacts of the hotel use would be mitigated through the submission of a Hotel Operational Management Plan to be secured by means of the S.106 agreement.*

## Transport

- Negative impacts from pick up/drop off (idling) on Holmes Road.
- Increased traffic and congestion on Holmes Road, impacting the nearby school and safety of residents.
- Increased traffic would lead to more vehicular accidents.
- Increased pollution from vehicles servicing the hotel.
- No mention of Holmes Road being turned into a one-way road in the proposal documents.

*Officer response: Please see Section 11 (Transport) for an assessment and summary of transport impacts resulting from the proposal and mitigation measures, including planning obligations and contributions such as coach free requirement, contribution to pedestrian, cycling, and environmental improvements on Holmes Road, and submission of Hotel Operational Management Plan.*

## 5. POLICY

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

National Planning Policy Framework 2024 (NPPF)

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 C6 Access for all

Policy A1 Managing the impact of development

Policy A4 Noise and vibration

Policy D1 Design

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy E3 Tourism

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

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



Kentish Town Neighbourhood Plan (2016)

Policy D3: Design Principles

Policy CC1: Pre-Application Consultation

Policy CC2: Statements of Community Consultation and Statements of Neighbour Involvement

Supplementary Planning Documents and Guidance

Kentish Town Planning Framework (July 2020)

Regis Road Area Guidance SPG (March 2025)

*Most relevant Camden Planning Guidance (CPGs):*

Amenity – January 2021

Design – January 2021

Developer contributions - 2019

Energy efficiency and adaptation – January 2021

Transport – January 2021

Sustainability – January 2021

Employment sites and business premises – January 2021

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
9	IMPACT ON NEIGHBOURING AMENITY
10	SUSTAINABILITY AND ENERGY
11	TRANSPORT
12	REFUSE AND RECYCLING
13	FIRE SAFETY
14	EMPLOYMENT AND TRAINING OPPORTUNITIES
15	BIODIVERSITY NET GAIN
16	COMMUNITY INFRASTRUCTURE LEVY (CIL)

17	<b>CONCLUSION</b>
18	<b>RECOMMENDATION</b>
19	<b>LEGAL COMMENTS</b>
20	<b>CONDITIONS</b>
21	<b>INFORMATIVES</b>

## 7. LAND USE

### ***Loss of Office Use***

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period.
- 7.2 Where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of space by specialist third party providers. CPG Employment Sites provides further guidance on the minimum expectations of the nature and contents of marketing information.
- 7.3 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 the subject site are struggling to find a market, even with recent refurbishments. As a result, the Grade B stock is experiencing void periods.
- 7.4 Additionally, there has been a permanent change to working practices post-Covid, with employers adopting a flexible approach to working from home. Firms are now desiring to be in more central smaller office space, with areas such as Kentish Town seeing less demand for office space as firms move more central.
- 7.5 Within a 0.25-mile radius of the subject site, there has been only a single office transaction in the past six months. This limited leasing activity suggests low demand and few transactions in the vicinity. The downturn in leasing

might be linked to the year-long closure of the Kentish Town underground station, which has influenced businesses to reconsider their presence in the area.

### ***Marketing Evidence***

- 7.6 The submitted marketing report (prepared by BBG Real Estate, dated 20 September 2024) covers the time period from August 2021 to mid-2024, thus meeting the minimum two-year marketing period noted above. The report outlines that the premises were comprehensively refurbished in 2018 to make it attractive to new tenants, including the addition of air conditioning, lifts, new fitouts (bathrooms and kitchens), and amended floorplans.
- 7.7 The premises was marketed in a range of different sizes from 1000sqft to a total of 14,877sqft, offering on a wholly or floor by floor basis, to try and attract different prospective tenants. It notes that Kentish Town has declined as an office location over recent years, with the temporary closure of Kentish Town underground station exacerbating this issue (it is noted that Kentish Town underground station has since reopened).
- 7.8 The rent was advertised at £39.50 per sqft, which is above the average of £34.37 per sqft within Kentish Town; this is accepted at the higher rate due to the recent refurbishment of the office. It is also noted that discounted rates were offered. The two-year marketing exercise included distributing to over 500 commercial agents and advertisement on major commercial property platforms.
- 7.9 Common reasons for lack of interest were DDA access, closure of Kentish Town underground station, internal configuration, and size of floorplates.
- 7.10 Overall, based on the marketing evidence and supporting information provided, the loss of employment space is accepted in this case, given the alternative use being acceptable and the application being subject to compensation for the loss of employment (to be secured through the S.106 agreement).

### ***Compensation for loss of Employment Space***

- 7.11 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.

- 7.12 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.
- 7.13 Employment floorspace lost (sq. m) 1763.7 / 12 space requirement per full time employee = 146 full time jobs lost.
- 7.14 Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use): 146 – 50 (from application form) = 96 FT jobs.
- 7.15 Full time jobs lost 96 x 21% = 20 [% of Camden residents who work in Camden] 20 x £3,995 [cost to provide training per employee] = £79,900
- 7.16 The contribution amount (£79,900) for the loss of employment space will be secured by means of the S.106 agreement if planning permission is granted.

#### ***Preferred Use for Residential***

- 7.17 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. 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***

- 7.18 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.
- 7.19 Policy E3 (Tourism) recognises the important of the visitor economy in Camden and expects new, smaller-scale visitor accommodation in town centres such as Kentish Town. All tourism development and visitor accommodation must be easily reached by public transport; provide any necessary pickup and set down points for private hire cars and coaches; not result in harm to the balance and mix of uses in the area, residential amenity, local character, services for the local community, the environment or transport systems; and not lead to a loss of permanent residential accommodation.

- 7.20 The proposed hotel will provide 74 bedrooms. A hotel of this size would be acceptable in this location given its position on a town centre high street and in close proximity to transport links. 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 on a town centre high street, particularly outside of office hours. Concerns have been raised by local residents and by the Kentish Town Neighbourhood Forum with regards to increased guest footfall, particularly in the evening. Further details on the impact of the proposals on neighbouring amenity are outlined in Section 9 (Impact on Neighbouring Amenity). Section 11 (Transport) also outlines mitigation measures to manage the impact of the hotel, including a S.106 agreement requirement for a Hotel Management Plan.
- 7.21 The proposed use would also bring new jobs (albeit, with a reduction to those in the vacant lawful use as offices) to the area. To take account of the reduction in jobs directly on site, an employment and training benefits package has also been secured (see Section 14 below). Overall, the principle of the hotel's use at the site is acceptable.

## **8. DESIGN**

- 8.1 The proposals include minimal alterations to the exterior of the buildings and comprise installation of rooflights to the main roofs of both buildings to allow for natural illumination to hotel rooms located in the interior of the building. Given their lack of visibility from the public realm, they are not considered to unduly harm the character of the host building or wider area.
- 8.2 Similarly, the provision of PV panels on the rear flat roof and flat roof of no.301-305 will be limited in public views and are therefore acceptable on design grounds. Details of the PV panels will be secured by condition (Condition 5) to ensure their acceptability.

## **9. IMPACT ON NEIGHBOURING AMENITY**

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. 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 occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 9.2 The limited external alterations which are concentrated at roof level (rooflights and PV panels) will not unduly harm the amenity of neighbouring occupiers with regards to loss of daylight/sunlight, outlook, and privacy.

- 9.3 A condition (Condition 9) has been added to prohibit the flat roofs located at the rear of the site at second-floor level being used as a roof terrace, sitting area, or amenity space for hotel guests. This will ensure there are no amenity impacts to neighbouring residential occupiers with regards to overlooking, privacy, or noise resulting from the development.

***Impact of Hotel Use***

- 9.4 The proposed hotel is small in scale, with just 74 rooms. Whilst guest access would be from Holmes Road, which is a slightly quieter street, the site is located on a busy high street and in the town centre. The hotel would create some additional activity, but it is not considered that it would create significant noise or disturbance if properly managed and mitigated through submission of a Hotel Operational Management Plan, and Servicing & Waste Management Plan.
- 9.5 The draft Hotel Operational Management Plan, the final details of which will be secured by means of the S.106 agreement, outlines details on staff management, travel arrangements (including transport implications and restrictions), security arrangements, waste and servicing, guest behaviour. Submission of the final Management Plan will ensure that the hotel is properly managed, minimising impacts to neighbouring occupiers from employees and guests of the hotel. Further details are outlined in the following Transport section.
- 9.6 The submitted Delivery, Servicing & Waste Management Plan, the final details of which will be secured by means of the S.106 agreement, sets out how deliveries, servicing, and waste collection associated with the proposed hotel will be managed and controlled. This will ensure that servicing activity is undertaken successfully, efficiently, sustainably, and without conflict between vehicles, pedestrians, and vulnerable road users. Further details are outlined in the following Transport section.
- 9.7 In terms of the quality of hotel accommodation, typical room layouts have been provided. Whilst the rooms would be compact and some without windows, there are considered suitable for short term use by visitors. Some of those who made written representations were of the opinion that hotel rooms without windows are in principle an unsuitable way of accommodating visitors. Whilst this is a legitimate point of view, it does not find support in Planning policy or guidance. Visitors in London have a wide choice of hotel accommodation, with some deciding a room without a window is not suitable, and others would find it suitable for their needs weighing in the accessible location and proximity to a town centre.

## 10. SUSTAINABILITY AND ENERGY

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

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

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

10.3 To minimise operational carbon, development should follow the energy hierarchy in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

10.4 As shown in Table 1 (below), the proposed refurbishment for the new hotel use will reduce emissions by 35% compared to the Part L 2021 baseline, and the proposed energy efficiency measures will reduce emissions by 22% and 13% as described in the 'Be Lean' and 'Be Green' results section.

10.5 Therefore, the scheme meets 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 CLP Policy CC3.

10.6 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major scheme set out in the London plan and Camden Local Plan 2017.

<b>Policy requirement (on site)</b>	<b>Min policy target (tonnes CO2 per annum)</b>	<b>Proposal reductions (%)</b>
Be Lean (energy demand reduction)	14.8	22%
Be Clean (heat network / CHP)	0.0	N/A
Be green stage (renewables): CLP policy CC1	8.3	13%
Total carbon reduction: LP policy SI2 and LP CC1	23.1	35%

*Table 1 - Operational carbon summary*

### ***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 meets the policy target of 35% reductions, achieving an overall on-site reduction of 35% 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 SI2 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 22% at this stage. The emissions savings obtained from the efficiency upgrades include measures such as energy-efficient lighting and ventilation.

### ***Be Clean Stage (decentralised energy supply)***

- 10.11 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.
- 10.12 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)***

- 10.13 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.
- 10.14 In this case, the development does not meet the policy target of 20%, reducing emissions by 13% at this stage through renewables in compliance with the development plan. Given the scope of the development, and the utilisation of existing air source heat pumps, it is difficult to meet the policy target. However, as the proposals include significant array of PV panels and is for refurbishment only, it is considered acceptable in this instance. Details of the proposed PV panels will be secured by condition (Condition 5) to



ensure the development provides adequate on-site renewable energy facilities in accordance with Local Plan policies.

### ***Climate Change Adaption and Sustainable Design***

- 10.15 The proposal incorporates water-efficient design measures to minimise on-site water consumption. A condition (Condition 4) would secure the water usage target of 105 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.

### ***Summary***

- 10.16 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. TRANSPORT**

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

- 11.1 The site is located on the corner of Kentish Town Road and Holmes Road, with commercial and residential properties in the immediate vicinity. Kentish Town Road forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- 11.2 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6a (excellent). Kentish Town Railway & Underground Station is located approximately 120m north of the site. The nearest bus stops are located approximately 50m and 100m south of the site, providing services to Archway and Highgate, and Chalk Farm and Camden Town, respectively.
- 11.3 There is a commitment to introduce segregated cycle route improvements on Kentish Town Road between Royal College Street and Fortess Road, as well as additional improvements to part of the Holmes Road Area Safe and Healthy Streets Scheme.
- 11.4 The development is not well served by the Santander cycle hire scheme, with the nearest docking station located on Bonny Street outside Camden Road Railway Station, approximately 1km south of the site. However, there are plans to expand the network into the area; therefore, a contribution of £20,000 is sought toward the new docking stations which will be provided on Holmes Road, to be secured through the S.106 agreement.

- 11.5 There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Islip Street and Gaisford Street. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

***Policy Review***

- 11.6 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. 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.
- 11.7 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 out Council objectives, policies, and measures for achieving this goal. Such priorities including 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.

***Trip Generation***

- 11.8 The TRICS database was used to derive the anticipated total person trip rates for the proposed hotel, with the net in trip generation derived by subtracting the existing office trip forecasts from the proposed hotel trip forecasts. If the building was fully occupied as offices, it would generate 158 trips, compared to the proposed hotel use which will generate 307 trips – an uplift of 149 trips.
- 11.9 However, as the existing office floorspace has been vacant since 2021 that does need to be taken into account and is a material consideration. The actual impact of the proposed change of use on the transport network would inevitably feel far more significant because of the fact that the existing building has been vacant for a number of years.
- 11.10 Although the lawful use of the building could hypothetically generate 158 trips, as it has been vacant for a number of years the existing offices generate zero trips. This means the proposed hotel will generate 307 trips compared to the vacant site.
- 11.11 Table 6.6 presented in the TS and reproduced here, shows the anticipated total multi-modal person trip rates for the proposed hotel.

Table 6.6: Proposed Hotel Multi-modal Trip Generation (74 rooms)										
Travel Mode	Mode %	AM Peak Hour			PM Peak Hour			Daily		
		In	Out	Total	In	Out	Total	In	Out	Total
Underground	31%	1	6	6	4	4	8	44	51	95
Rail	25%	1	5	5	3	3	6	36	42	78
Bus	7%	0	1	1	1	1	2	10	12	22
Taxi	5%	0	1	1	1	1	1	7	8	15
Motorcycle	1%	0	0	0	0	0	0	1	1	2
Car Driver	0%	0	0	0	0	0	0	0	0	0
Car Passenger	0%	0	0	0	0	0	0	0	0	0
Cycle	8%	0	1	2	1	1	2	11	13	24
Walk	23%	1	4	4	3	3	6	33	38	70
<b>Total</b>	<b>100%</b>	<b>4</b>	<b>15</b>	<b>19</b>	<b>13</b>	<b>11</b>	<b>25</b>	<b>143</b>	<b>164</b>	<b>307</b>

*Note: minor numerical discrepancies are due to rounding*

11.12 The proposal will result in a significant increase in person trips, especially during peak hours. The anticipated high volume of the walking trips is likely to be made from Kentish Town Railway & Underground Station, bus stops along Kentish Town Road, and commercial, entertainment, shopping, and restaurant venues in Kentish Town, Camden Town, Tufnell Park, Chalk Farm, and further afield.

11.13 An Active Travel Zone (ATZ) assessment included in the TA focuses on five routes to key destinations. The analysis recommends various improvements to the local transport network, specifically Kentish Town Road and Highgate Road, with a view to enhancing the walking and cycling environment.

### ***Trip Generation***

11.14 In line with CPG Transport, a Strategic Level Travel Plan should be provided. A detailed Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by S.106 agreement if planning permission is granted.

### ***Access and Permeability***

11.15 Holmes Road to the south of the site will provide the main hotel entrance for pedestrians only. An additional access to the cycle store and servicing yard, with access only permitted for staff/operatives, will be provided adjacent to the main entrance.

11.16 A secondary pedestrian access is proposed onto Kentish Town Road; however, this will be for hotel staff only, whilst also being used for servicing activity. Delivery and servicing arrangements, further described later in this section, should not conflict with staff arriving to and leaving the premises.

11.17 There is no vehicular access proposed to the premises.

### **Cycle Parking**

- 11.18 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for C1 use, hotels: 1 space per 20 bedrooms long-stay, and 1 space per 50 bedrooms short-stay.
- 11.19 4 long-stay spaces are proposed to be provided within the service yard in a sheltered and secure area. Details of the spaces will be secured by condition (Condition 6) to ensure that the type of cycle storage, its dimensions, are acceptable and offer well-lit access and environment for storing bikes.

### **Car Parking and Vehicle Access**

- 11.20 The site is located in controlled parking zones CA-M East Kentish Town and in CA-L Outer, which operate 08:30-18:30 Monday to Friday. The development is proposed as car-free, which would be secured by S.106 agreement if planning consent were granted.
- 11.21 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: *'...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.'* Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: *'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'*
- 11.22 Paragraph 5.19 of the Camden Planning Guidance on Transport states: *'For all major developments the Council will expect that disabled car parking is accommodated on-site.'* Paragraph 5.20 further informs: *'...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site.'*
- 11.23 The applicant is willing to provide a disabled parking space in the vicinity of the site, for which a contribution of £4,000 will be secured by S.106 agreement in accordance with Local Plan Policy A1 if planning permission were granted. A suitable location on Holmes Road will be considered.
- 11.24 It is expected the large majority of guests and staff to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the

site. A financial contribution of £20,000 will be secured by S.106 agreement in accordance with Local Plan Policy A1 if planning permission were granted.

### ***Coach Parking and Taxis***

- 11.25 The submitted Transport Statement states: *'With respect to coach parking, this is not expected due to the scale and nature of the hotel and the fact it will not provide any ancillary features that could otherwise generate a need for larger group and coach bookings (e.g. there are no conference facilities or similar).'*
- 11.26 However, Officers are 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 in the local area. Therefore, a Coach Free planning obligation will be secured by S.106 agreement stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Camden Local Plan Policy E3 (Tourism - paragraph 5.60).
- 11.27 Taxis pick-up and drop-off can be achieved from Holmes Road.

### ***Construction Management***

- 11.28 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.
- 11.29 The site is located on Kentish Town Road, 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. Considering the proximity of St Patrick's Catholic Primary School to the site, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays.
- 11.30 A more detailed Construction Management Plan (CMP) document will be secured by S.106 agreement in accordance with Local Plan Policy A1 if planning permission is granted.

- 11.31 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 11.32 Implementation support contributions of £10,116 and impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by S.106 agreement in accordance with Local Plan Policy A1 if planning permission were granted.
- 11.33 A further requirement to form a construction working group (CWG) consisting of representatives from the local community including local schools prior to commencement of works will also be secured by S.106 agreement if planning permission is granted.

#### ***Deliveries and Servicing***

- 11.34 A draft Delivery and Servicing Plan was submitted with the application. The hotel is anticipated to generate a daily servicing demand of 1-2 vehicles.
- 11.35 Holmes Road is proposed to be the primary visitor entrance, utilising single yellow lines outside the restrictions. Kentish Town Road is proposed to be the primary servicing entrance; however, considering the planned segregated cycle lanes on Kentish Town Road, the applicant should note that servicing from this location may not be possible. Further details on deliveries and servicing will be provided with the submission of a Delivery, Servicing, and Waste Management Plan, secured by S.106 agreement.

#### ***Highway Works***

- 11.36 It is felt that significant damage to the public highway is unlikely to be caused during demolition and construction. Therefore, it is suggested that a highways contribution of £20,000 be secured by S.106 agreement if planning permission is granted.

#### ***Pedestrian, Cycling, and Environmental Improvements***

- 11.37 Securing financial planning obligations towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the transport network. New developments place pressure on the existing infrastructure and benefit directly from new and improved safe and healthy street schemes to be delivered across the borough. The Council has an extremely ambitious Camden Transport Strategy Delivery Plan for 2024/25, and the period 2025/26 to 2027/28, which is to be implemented through various financial sources, including developer contributions, not only CIL.
- 11.38 It is therefore appropriate that all developments, even those with limited transport impact, should contribute towards future safe and healthy streets

infrastructure schemes including segregated cycle route improvements on Kentish Town Road and Healthy School Street scheme on Holmes Road, outlined below.

11.39 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 £135,000 towards:

- The segregated cycle route improvements on Kentish Town Road between Royal College Street and Fortress Road.
- The upgrade of the in-flight Healthy School Street scheme on Holmes Road to wider Safe & Healthy Streets interventions with potential further traffic restriction measures and Healthy Streets initiatives (junction improvements, pedestrian crossings, traffic calming, EVCPs etc), in the Holmes Road Area/Kentish Town West area.

11.40 The £135,000 contribution would be secured by S.106 agreement if planning permission were granted.

#### ***Micromobility Improvements***

11.41 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.

11.42 The STAL analysis shows very low grades between 1a and 3 throughout the area which indicates significant opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 5. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted.

11.43 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured through a S.106 agreement if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

#### ***Conclusion***

11.44 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. Objections have raised concerns with the impacts of the scheme on traffic and the amenity of local residents, which will be mitigated by S.106 contributions which support the use of sustainable modes of transport.

## **12. REFUSE & RECYCLING**

12.1 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.

12.2 Refuse and recycling will be stored in dedicated waste storage area located within the existing secure service yard accessed from Holmes Road. Details of waste management will be secured by condition (Condition 7) through the submission of a final Delivery, Servicing, and Waste Management Plan.

## **13. FIRE SAFETY**

13.1 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.

13.2 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 Vemco Consulting, 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, firefighting staircase core provision, alarm systems and fire suppression measures.

13.3 Given the above, the proposals are considered to comply with London Plan policies D12 and D5 and a condition (Condition 8) ensures that the fire strategy is implemented in accordance with the approved report.



## **14. EMPLOYMENT AND TRAINING OPPORTUNITIES**

- 14.1 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.
- 14.2 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 1,000sqm (GIA) or larger to provide employment or training initiatives secured through a S.106 agreement with the Council unless evidence demonstrates that the scheme is below the £3m build cost trigger.
- 14.3 In this case, the build costs are estimated at £3 million. The applicant must recruit 1 construction apprentices paid at least a London Living Wage and pay the council a support fee of £1,700 (£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 S.106 agreement.
- 14.4 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 500m<sup>2</sup> of employment floorspace, which includes hotels) 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 1,763.7sqm of hotel (Class C1) floorspace, equating to 3 construction work experience placements. The applicant has agreed to 3 construction work experience placements, which will be secured through a S.106 agreement.
- 14.5 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.
- 14.6 Regarding Local Procurement, the applicant would also sign up for the Camden Local Procurement Code (to be secured as part of the S.106 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.

14.7 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

## **15. BIODIVERSITY NET GAIN**

15.1 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. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

16.1 CIL applies to all proposals that add 100m<sup>2</sup> of hotel new floor space. The amount to pay is the increase in floor space (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. Based on the uplift of 1763.7sqm, the total charge for Camden CIL would be £67,020.60.

## **17. CONCLUSION**

17.1 The application is for change of use of the existing office (Class E) building at the upper levels of 293-299, 301-305 Kentish Town Road and 8 Holmes Road to provide a 74-bedroom Class C1 hotel.

17.2 The applicant has suitably demonstrated the lack of market demand for offices in this location, with the alternative proposed hotel use considered acceptable given its location on a high street, within a town centre, and proximity to transport links. The proposed hotel will bring a vacant building back into use, re-providing employment in a key area of the Borough. Additional employment benefits have been negotiated including apprenticeships during the construction phase, construction work experience placements, and local recruitment and procurement.

17.3 Responses from the public consultation process cited concerns with the impacts of the proposals, specifically with traffic along Holmes Road, noise from visitors, and additional footfall. Given the small scale of the hotel, and with the provision of mitigation measures such as a Hotel Operational

Management Plan and a sizable contribution to pedestrian, cycling, and environmental improvements in the immediate area, the development would not result in undue harm to neighbouring amenity.

- 17.4 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.

## **18. RECOMMENDATION**

- 18.1 Grant conditional Planning Permission subject to a S.106 Legal Agreement with the following heads of terms:

- Car-free development
- Travel Plan and associated monitoring and measures contribution of £11,348
- Santander cycle hire scheme contribution of £20,000
- Off-site contribution of £4,000 for a disabled parking space
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000
- No coach party bookings and a ban on customers being picked up or dropped off by coach at any time outside the hotel
- Construction Management Plan (CMP), CMP implementation support contribution of £10,116 and CMP impact bond of £16,000
- Requirement to form a construction working group consisting of representatives from the local community (to be tied to the CMP)
- Highways works contribution of £20,000
- Micromobility improvements contribution of £10,000
- Pedestrian, Cycling, and Environmental Improvements contribution of £135,000
- Hotel Operational Management Plan
- Delivery, Servicing, and Waste Management Plan
- Loss of office/employment space contribution of £79,900
- 1 construction apprentices paid at least a London Living Wage plus a support fee of £1,700
- 3 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

**19. LEGAL COMMENTS**

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

**20. CONDITIONS**

1	<p><b>Three years from the date of this permission</b></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 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p><b>Approved Drawings</b></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>Existing Drawings:  2305-LAT-XX-00-M2-A-P10002, 2305-LAT-XX-00-DR-A-10100,  2305-LAT-XX-00-DR-A-10101, 2305-LAT-XX-00-DR-A-10102,  2305-LAT-XX-00-DR-A-10103, 2305-LAT-XX-00-DR-A-10104,  2305-LAT-XX-00-M2-A-10201, 2305-LAT-XX-00-M2-A-10202,  2305-LAT-XX-00-M2-A-10203, 2305-LAT-XX-00-M2-A-10204,  2305-LAT-XX-00-M2-A-10205, 2305-LAT-XX-00-M2-A-10206,  2305-LAT-XX-00-M2-A-10301, 2305-LAT-XX-00-M2-A-10302,  2305-LAT-XX-00-M2-A-10303</p> <p>Proposed Drawings:  2305-LAT-XX-00-DR-A-15100-S4-P2, 2305-LAT-XX-00-DR-A-15101-S4-P2,  2305-LAT-XX-00-DR-A-15102-S4-P2, 2305-LAT-XX-00-DR-A-15103-S4-P2,  2305-LAT-XX-00-DR-A-15104-S4-P2, 2305-LAT-XX-00-DR-A-15105-S4-P2,  2305-LAT-XX-00-M2-A-15201-S4-P2, 2305-LAT-XX-00-M2-A-15202-S4-P2,  2305-LAT-XX-00-M2-A-15203-S4-P2, 2305-LAT-XX-00-M2-A-15204-S4-P2,  2305-LAT-XX-00-M2-A-15205-S4-P2, 2305-LAT-XX-00-M2-A-15206-S4-P2,  2305-LAT-XX-00-M2-A-15301-S4-P2, 2305-LAT-XX-00-M2-A-15302-S4-P2,  2305-LAT-XX-00-M2-A-15303-S4-P2, 2305-LAT-XX-00-M2-A-15304-S4-P2</p>

	<p>Supporting Documents:  Design and Access Statement (prepared by Latitude, undated), Planning Statement (prepared by Newsteer, dated September 2024), Marketing Evidence (prepared by BBG, dated 20 September 2024), Hotel Market Assessment (prepared by Savills, dated 17 December 2024), Energy and Sustainability Statement (prepared by Consult JA Ltd., dated August 2024), Transport Assessment (prepared by Caneparo Associates, dated July 2024), Draft Delivery Servicing and Waste Management Plan (prepared by Caneparo Associates, dated July 2024), Draft Construction Management Plan (prepared by Caneparo Associates, dated July 2024), Hotel Operational Management Plan (prepared by CA, undated), Fire Statement (prepared by Vemco, dated July 2024)</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p><b>Materials to Match Existing</b></p> <p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the London Borough of Camden Local Plan 2017.</p>
4	<p><b>Water Efficiency</b></p> <p>The development hereby approved shall achieve a maximum internal water use of 105 litres per person per day for internal use and 5 litres for external use. The dwelling 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>

<p>5</p>	<p><b>Solar PV Panels</b></p> <p>Prior to commencement of development, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells (generation capacity at least 4.74kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
<p>6</p>	<p><b>Cycle Parking</b></p> <p>The cycle facilities to accommodate 4 long-stay 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 and maintained 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>
<p>7</p>	<p><b>Waste and Recycling Storage</b></p> <p>The waste and recycling storage shown on the approved plans shall be provided prior to first occupation of any of the new hotel rooms hereby permitted and shall thereafter be permanently retained and maintained 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>

8	<p><b>Fire safety</b></p> <p>The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by Vemco Consulting dated July 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>
9	<p><b>No use of roof as terrace</b></p> <p>The flat roofs located at second-floor level as shown on drawing number '2305-LAT-XX-00-DR-A-15102-S4-P2' shall not be used as a roof terrace, sitting out area or other amenity space.</p> <p>Reason: To protect the amenity of adjoining occupiers and the area in accordance with policies A1 and D1 of the Camden Local Plan 2017.</p>

## 21. INFORMATIVES

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>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>
3	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>

4	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<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>
6	<p>You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.</p>
7	<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 <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.</p>



8

**Biodiversity Net Gain (BNG) Informative:**

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 (“1990 Act”) is that planning permission granted in England is subject to the condition (“the biodiversity gain condition”) that development may not begin unless:

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

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

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.

Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat)

# Planning Committee

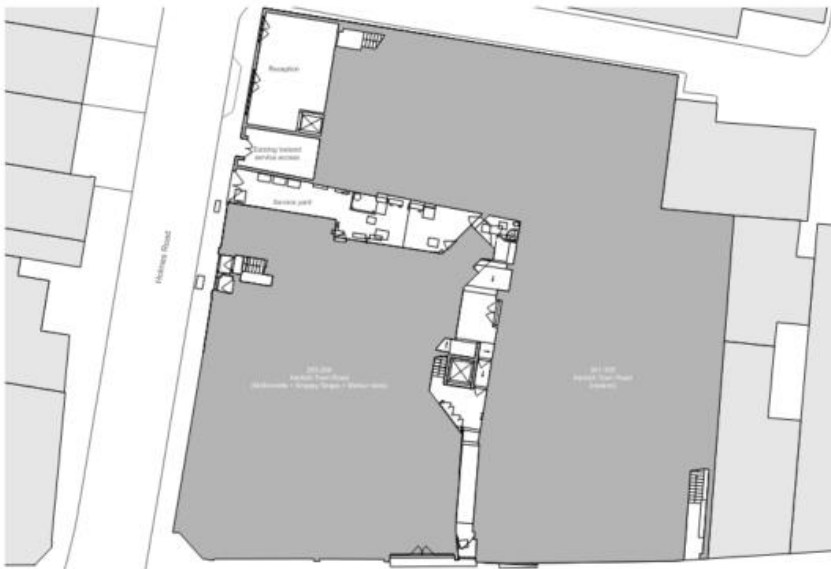
03 April 2025

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2024/4116/P

293-299, 301-305  
Kentish Town Road & 8  
Holmes Road  
NW5 2TJ





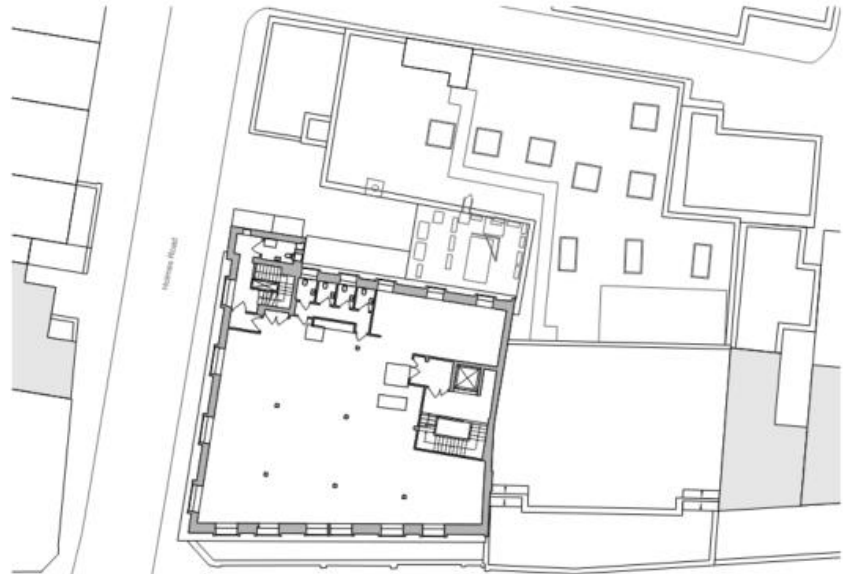
Ground floor plan



First floor plan



Second floor plan



Third floor plan

















View of corner of Kentish Town Road and Holmes Road



View of existing office entrance on Holmes Road



View east along Holmes Road



View north along Kentish Town Road



View of 301-305 Kentish Town Road



View south along Kentish Town Road