



Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell

GVA

Kensington Forum Hotel – London

PLANNING STATEMENT | JUNE 2018



Kensington Forum Hotel

Planning Statement

June 2018

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1. Introduction

- 1.1 This Planning Statement (the “Statement”) has been prepared by GVA and is submitted in support of an application made by Queensgate Bow UK Holdco Limited (the “Applicant”) in respect of an application (the “Application”) for full planning permission for the redevelopment of Kensington Forum Hotel, 97 Cromwell Road, SW7 4DN (the “Site”).
- 1.2 The Application is submitted to the Royal Borough of Kensington and Chelsea (“RBKC”) and sets out the planning case in support of the proposals in the context of relevant national, regional and local planning policy guidance.
- 1.3 The description of the proposed development (the “Proposed Development”) is set out below:

“Comprehensive redevelopment and erection of a part 30, part 22 and part 7 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities and back of house areas; residential accommodation (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, servicing areas; associated highway works and creation of new publicly accessible open space with associated hard and soft landscaping.”

Supporting Information

- 1.4 This Statement should be read in conjunction with the accompanying drawings and accommodation schedules, prepared by SimpsonHaugh and Exterior Architecture, submitted as part of the Application, as well as the following application documents:
- Cover Letter
 - Application Form and Certificates
 - Community Infrastructure Levy Form
 - Environmental Statement Non-Technical Summary
 - Environmental Statement Volume I (Environmental Statement)
 - Environmental Statement Volume II (Townscape, Visual and Heritage Impact Assessment)
 - Environmental Statement Volume III (Technical Appendices)
 - Design and Access Statement (including Landscape Strategy and Wider Public Realm Strategy)
 - Statement of Community Involvement
 - Transport Assessment (including an Outline Delivery and Servicing Management Plan, Coach and Taxi Management Plan, Car Parking Management Plan, Construction Traffic Management Plan; and Framework Travel Plan).
 - Energy Statement
 - Sustainability Statement

- Basement Impact Assessment
- Arboricultural Assessment
- Draft Open Space Management Plan
- Hotel Market Overview Report
- Viability Assessment
- S.106 Obligations Statement

Environmental Impact Assessment

1.5 An informal request for a Scoping Opinion was submitted to RBKC on 20 September 2017 in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.6 Following discussions with RBKC, it was agreed that the Environmental Statement will address the following topics:

- Demolition and Construction
- Socio-Economics
- Traffic and Transport
- Air Quality
- Noise and Vibration
- Daylight, Sunlight, Overshadowing and Solar Glare
- Wind Microclimate
- Cumulative Effects

1.7 It has been agreed that the following topics are scoped out of the Environmental Statement:

- Aviation
- Ecology
- Archaeology
- Ground Conditions and Contamination
- Water Resources and Flood Risk
- Health
- Telecommunication Interference

Pre-application Consultation

1.8 The final application proposals are the result of a comprehensive pre-application consultation exercise with the Royal Borough of Kensington and Chelsea. These discussions have involved RBKC Planning, Design, Highways and Environmental Officers over 20 month period. There have been 15 meetings in total.

- 1.9 The scheme has also been presented the Council's Architectural Appraisal Panel (AAP) on two occasions during the design evolution of the scheme. In addition, discussions have been had with the Greater London Authority (the "GLA"), Transport for London (the "TfL") and other key stakeholders.
- 1.10 The Applicant has also engaged with the local community in the design and evolution process. A Community Liaison Group (CLG) was set up in October 2016 and there have been 6 meetings over the last 18 months.
- 1.11 Public Exhibitions were held in October 2016, November 2017 and May 2018 at which local residents, business owners and Councillors were invited to comment on the emerging proposals.
- 1.12 The engagement with all parties have directly informed the scheme's evolution and greatly assisted in contributing to the final design of the development.
- 1.13 A Statement of Community Involvement, prepared by Cratus, provides further details of pre-application consultation process and the local community's role and is submitted in support of the Application.

Planning Performance Agreement

- 1.14 This Application is support by a Planning Performance Agreement (PPA) agreed with RBKC. Under the PPA, the planning application is targeted to be presented to the Planning Committee in September 2018 based on current timescales.

2. Scheme Benefits

- 2.1 The Proposed Development provides a significant opportunity to positively transform the Site and create a new place that will provide long-term social and economic benefits to the Royal Borough and the local community.
- 2.2 It will deliver a new luxury hotel with a dual serviced apartment offering, new homes (with nearly half of these being made affordable), bars/restaurants, health spa and gym, associated conferencing and function facilities as well as new garden square that will be accessible for all.
- 2.3 The proposals will deliver the following key planning and regeneration benefits:

Design and Public Realm

- Create a building of exceptional architectural quality designed by award winning architects with a lasting legacy to this area of London. It will replace the current 'eyesore' with an elegant and contemporary building of similar scale that responds to its local context in its language and use of traditional, high quality materials that will endure and develop with age.
- Re-creating a traditional garden square measuring 2,702 sqm as a publicly accessible amenity space for reflection, relaxation and play that is more attractive, usable, safe and desirable for local residents and visitors. This represents a rare and exciting opportunity which will be one of the first of its kind in London during recent times.
- The garden will be funded and maintained by the Applicant and a Management Committee will be set up so that the local community can influence how it is used, managed and maintained.
- Retention of all London Plane trees, alongside the addition of 29 new trees and the introduction of 140 new plant species.
- Significantly improve the public realm and the overall quality of the external environment both for the neighbourhood and the setting of the hotel by re-engaging with the streets that surround the Site and funding wider public realm improvements, including to the area around Gloucester Road tube station.
- A sensitively designed building that would have no major adverse environmental affects upon the neighbouring residential occupiers.

Economy

- Enhance the quantum, quality and customer choice of visitor accommodation with an upgrade in ancillary services and facilities to match.
- Delivering up to 817 new full-time jobs, a net increase of between 243 and 617 full time jobs, thereby doubling and potentially tripling the number of hotel related jobs.
- Delivering up to 600 construction jobs.

- Investment of circa £400m in build costs alone, representing a contribution of some circa £850m to the wider economy.
- The provision of CIL receipts and S.106 contributions, which will address the impacts that arise directly as a result of the development, will enhance the provision of social, physical or community infrastructure, benefiting RBKC.

Homes

- Re-balance the mix of land uses on the Site by re-introducing residential use on Courtfield Road to reflect the existing residential character, also replacing the current coach and taxi parking and drop off area.
- Provision of a total of 46 residential apartments in range of sizes that will make an important contribution to the Council's housing targets and meet identified local need.
- 45% of the homes will be affordable, with 60% in the Social Rented tenure and 40% in the Intermediate tenure at London Living Rents to help promote a mixed and balanced community in the local area.

Sustainability

- Utilisation of sustainable and energy-efficient building techniques to ensure potential carbon dioxide emissions are reduced, targeting BREEAM Excellent for the hotel element and achieving Air Quality Neutral for the development as a whole.

3. The Site and Surrounding Context

- 3.1 The Site is located within the Royal Borough of Kensington and Chelsea (RBKC) in the Courtfield ward of the borough. The Site comprises a single urban block measuring 0.76 hectares and is bounded by Cromwell Road to the north, Ashburn Place to the east, Courtfield Road to the south and Ashburn Gardens to the west.
- 3.2 The Site is occupied by a large post war building, the Kensington Forum, purpose built as a hotel. The Kensington Forum Hotel, currently managed by Holiday Inn, provides 906 bed spaces supported by on-site conference facilities, hotel restaurants and bars, a public house and approximately 100 car parking spaces at basement levels.
- 3.3 The existing building was constructed in 1972 by Penta, a group formed by five major airlines to primarily provide accommodation for their air crews using Heathrow Airport. To this day, the hotel has continued to have a strong affiliation with the airport, with a significant proportion of the hotel regularly occupied by airline crew and staff.
- 3.4 The building, designed by Richard Seifert and Partners, is arranged in a cruciform shape, formed of 3 podiums of 8 storeys each with a 28 storey tower and plant area located above, comprising 29 storeys in total. The existing hotel floorspace comprises 51,688 sqm (GEA) approximately. The building is laid out at a 45-degree angle to the urban grain around it with few entrances and little permeability or legibility which creates a rather defensive, uninviting urban environment at ground level.
- 3.5 The service and staff entrances are located on the prominent Ashburn Place frontage, whereas the public entrance has been positioned at what is effectively the back of the building, on the corner of Ashburn Place and Courtfield Road. This is the main vehicular and pedestrian access to the existing hotel and includes a drop-off and turning space for taxis and coaches, as well as coach parking. The result is that pedestrians need to navigate through a drop off and pick up area to gain access. The perceived front of the site, along Cromwell Road, has no active frontages and little building presence by virtue of being set back from the street.
- 3.6 Part of the Site is occupied by a garden. There was once a garden square laid out in the nineteenth century, parts of which are designated under the London Squares Preservation Act (1931). As a result of the existing 1970s construction, the open space was re-allocated into smaller areas around the building and has become fragmented, losing its historical shape and function as a garden square. Despite its fragmented form, parts of the spaces around the building remain designated as a London Square.
- 3.7 The Site and its immediate surroundings exhibit a mixture of building uses, types, façade materials, heights and ages. Gloucester Road London Underground Station is immediately adjacent to the Site, providing direct access to central London and Heathrow Airport via the Circle, District and Piccadilly lines. The Site has a Public Transport Accessibility Level (PTAL) of 6a ("Excellent").
- 3.8 The existing streetscape on the key approaches to the Site from the immediately adjacent Gloucester Road underground station is generally in poor condition. The existing streetscape tends to reinforce, rather than soften the effect of the traffic on Cromwell Road and limit the sense of arrival and destination.

- 3.9 To the east and to the north-west, respectively, there are two local shopping areas including Gloucester Arcade shopping centre that was built over the station in the mid 1980's. There are a number of hotels, guest houses and apart-hotels within the vicinity, including Millennium Gloucester Hotel and The Baileys Hotel. On the opposite side of Cromwell Road is the Point West apartment building that occupies the site of the former West London Air Terminal building which similarly had a link to Heathrow Airport.
- 3.10 The buildings to the south and west of the site are characterised by a mix of lower rise historic residential terraces and hotels that lie within the conservation areas that adjoin the Site to the south and west. Whilst the Site is close to several conservation areas, it is not located in one itself and it does not contain any listed buildings. There are listed buildings located in the vicinity of the Site, including:
- Entrance arch from Cromwell Road – Grade II Listed
 - 13-19 Cromwell Road – Grade II Listed
 - 21-29 Cromwell Road – Grade II Listed
 - 59-79 Cromwell Road – Grade II Listed
 - 68-86 Cromwell Road – Grade II Listed
 - 57-62 Stanthope Gardens – Grade II Listed
 - Lodge at Natural History Museum – Grade II Listed
 - Gates, Gatepiers and Railings to Natural History Museum – Grade I Listed
 - Natural History Museum – Grade I Listed
 - Victoria and Albert Museum – Grade I Listed
- 3.11 The Site is part of a group of modern buildings in the Gloucester Road area that are taller than the typical building typology of South Kensington. The Site however does not occupy any strategic view corridors as defined in the London Plan.
- 3.12 The site does not fall within any planning policy designations or site allocations identified by the GLA or the Royal Borough's Proposals Map. However, the site is within close proximity to two neighbourhood centres, to the east and north-west. In addition to this, the site fronts Cromwell Road which is designated as a Transport for London (TfL) red route.

Planning History

- 3.13 The original street block fronted by Cromwell Road, numbers 1-23 Ashburne Place, Courtfield Road and the east side of Ashburn Gardens, used to comprise two terraces of buildings forming an 'L' shape on Cromwell Road and Ashburne Place. This included access fronting onto Ashburn Gardens and Courtfield Gardens. Outline hotel consent was granted in 1970. When the hotel was constructed on the Site, an area of substitute London Square land was provided facing Cromwell Road, to replace that lost by the development of the hotel.
- 3.14 Since the original planning application there are two relevant planning applications to note, submitted in 1990 and 2014 respectively.

- 3.15 The 1990 planning application (TP/90/1600), approved 16th January 1990, was for a new entrance lobby onto the Cromwell Road, a side extension onto Ashburn Gardens and a three-storey infill extension under the main building to provide a lounge and additional restaurant facilities. This application also included a new landscaped area facing the Cromwell Road. This application also included the re-cladding of the podium and this aspect of the application was implemented. In addition to this, the proposals also included a pick up and drop off facility for vehicles fronting Cromwell Road.
- 3.16 The 2014 planning application (PP/14/08952) was for a scheme that included, inter alia, the demolition of existing structures to the Cromwell Road elevation and provision of a casino with ancillary restaurant; façade improvements to hotel podium, associated landscaping, plant and car/cycle parking. The application was validated on 6th January 2015 and refused on 6th March 2015 for the following (summarised) reasons:
- Absence of a Section 106 (S106) planning obligation to secure that the existing Mint casino is closed upon the opening of the casino floorspace;
 - Lack of evidence and justification provided within the Transport Assessment with regard to customer numbers, trip generation, predicted travel modes and valet parking, has failed to demonstrate the impact of the proposals on on-street parking pressure would be acceptable;
 - No provision was made for a taxi rank on Ashburn Place;
 - The casino and restaurant/bar would attract significant numbers of visitors and would generate significant numbers of people arriving and leaving at unsocialable hours and it would not be possible for the owners to mitigate the noise and general disturbance this would generate in a predominately residential area, causing unacceptable harm to the living conditions of neighbouring residents.
 - The proposal, because of the loss of open space to the front of the site, would result in a loss of amenity and an overall loss of open space.
 - The applicant has not adequately justified the number of trips by visitors or for servicing/deliveries to be generated by the proposals, and has not adequately assessed the impact from the Combined Heat and Power Plant, and has inconsistently referred to the type of heating to be proposed. It has therefore not been adequately demonstrated that the proposed would have an acceptable impact on air quality.
 - In the absence of a S106 planning obligation to secure contributions to mitigate the impact of the proposed floorspace on local infrastructure, the proposals would not adequately mitigate their impact on local infrastructure.
- 3.17 An appeal was lodged but was subsequently withdrawn on 11 February 2016.

4. The Proposed Development

Background

- 4.1 The Kensington Forum Hotel was acquired by Queensgate Investments in 2015 and the hotel continues to be operated under the Holiday Inn brand. The nature of the building's construction, which uses in situ cast reinforced concrete to form bedroom walls makes more significant refurbishment or alterations difficult. The hotel is in need of a significant upgrade and the Applicant has investigated the scope to refurbish the existing building but due to the limiting structural constraints, has favoured demolition and comprehensive redevelopment as the more viable option in securing the most appropriate long term future for the hotel.
- 4.2 The Applicant's brief for the site included the following key objectives;
- To improve the overall quality of the external environment both for the neighbourhood and the setting of the hotel by reinstating the Garden Square as a publicly accessible amenity space.
 - To provide a higher-rated hotel on the site with a more diverse range of room types to suit the demand in the London market.
 - To improve the customer experience of the entire hotel, in particular it's sense of arrival.
 - To improve the front of house facilities for the hotel.
 - Increase the overall quantum of hotel accommodation on the site.
 - Improve the balance of land use by re-introducing homes on the site.
 - Create a building of architectural quality with a lasting legacy to this area of London.
- 4.3 The proposals have significantly evolved over an 18 month period and this process is documented in detail within the accompanying Design and Access Statement. The proposals are intended to be a contextual response to the specific constraints and opportunities that the site offers, in order to deliver a considered and appropriate scheme that is fully integrated into its context.

Proposal

- 4.4 The Proposed Development is for the demolition of the existing building on the Site and its redevelopment for 749 hotel bedrooms, 340 serviced apartments, 26 market sale residential apartments and 20 affordable residential apartments. The hotel and serviced apartments will be supported by ancillary functions, including restaurants, bars, conferencing and dining areas and leisure facilities that will be accessible to local community.
- 4.5 The new floorspace will be provided within three linked blocks located on the eastern half of the Site. A garden square will be located on the western half of the Site and an arrival square will be positioned at its north-west corner, together occupying the rest of the Site's urban block.

- 4.6 A rectangular 'podium' block of 7 storeys in height would be located on the eastern part of the Site, extending for almost its full length on a north-south alignment. The development has been set-back from the back of pavement along Courtfield Road to create a landscaped garden for use by the new residents.
- 4.7 Two taller elements would be located above the podium block and slightly off-set from it, such that they would slightly cantilever its eastern frontage; one block of 22 storeys would be located centrally within the base block, and one tower of 30 storeys would be located at its northern end. The residential element of the Proposed Development would occupy the southern end of the 7 storey podium. The hotel and serviced apartment uses would occupy the rest of this block and the two taller elements, with the central component occupied by serviced apartments, and the northern block occupied by hotel accommodation.
- 4.8 The proposed basement is located within the footprint of the existing basement to save excavation cost and to minimise any potential impact to tree roots and utility services as well as the underground tube line exclusion zone which runs through the north eastern corner of the site. There are two levels which are split into both front of house and back of house hotel accommodation. The lower levels contain hotel conference space, a gym, back of house facilities (kitchens, linen stores, hotel offices etc) as well as parking, refuse storage, an energy centre and associated plant rooms.
- 4.9 Restaurants are located at ground floor and mezzanine levels accessed directly from the lobby. A business centre serving the conferencing space is located at first floor level which has a direct circulation link to the lobby.
- 4.10 The garden square would comprise lawned areas, paths and planting including trees and measure 2,702 sqm in size. The north-western pick-up/drop-off area is not defined as part of the garden square would be hard landscaped. A wall with an integrated water feature and shelter would define the boundary between the two areas.
- 4.11 Full design details of the Proposed Development are provided in the accompanying Design and Access Statement and planning application drawings prepared by SimpsonHaugh and Exterior Architecture.
- 4.12 The quantum of proposed uses in the development are set out in Table 4.1 below:

Table 4.1 – Proposed Floorspace

	Proposed	
	GEA (sq.m)	GIA (sq.m)
Hotel (Use Class C1)	21, 531	20,282
Serviced Apartments (Use Class C1)	13,026	12,329
Ancillary Hotel Uses (Use Class C1)	40,239	38,764
Residential (Use Class C3)	4,092	3,947
Ancillary Residential (Use Class (C3)	2,088	2,006
Total	80,976	77,328

Hotel and Serviced Apartments

- 4.13 The Proposed Development will deliver a 749 bedroom hotel and 340 serviced apartments (Class C1). Serviced apartments are recognised by the London Plan as having an important role in providing accommodation for visitors to London.
- 4.14 The hotel offer includes conference, gym and restaurant/bar facilities that are commensurate the scale and nature of a superior quality hotel. The hotel receptions and restaurant will be at ground floor and provide active frontages. The hotel rooms are provided at different sizes as demonstrated below in Table 4.2.

Table 4.2 – Proposed Mix of Hotel Accommodation

Unit Type	Number of Units	Total (%)
Standard	434	57.9%
Superior	156	20.8%
Deluxe	122	16.3%
Suite	35	4.7%
Penthouse	2	0.3%
Total	749	100%

- 4.15 Whilst there is a net reduction in hotel bedrooms on the Site, the Proposed Development includes 340 serviced apartments to be offered on short term lets. The serviced apartments are provided at different sizes as demonstrated below in Table 4.3:

Table 4.3 – Proposed Mix of Serviced Apartment Accommodation

Unit Type	Number of Units	Total (%)
Studio	70	20.6%
1 Bed	201	59.1%
2 Bed	67	19.7%
Penthouse	2	0.6%
Total	340	100%

- 4.16 10% of the hotel guest rooms and serviced apartments are allocated as wheelchair rooms and are sized and planned accordingly.
- 4.17 The existing hotel currently employs circa 200 people. The Proposed Development will provide between 443 to 817 (gross) FTE jobs. Taking into consideration existing jobs that would be lost, the Proposed

Development would deliver a net increase of between 243 and 617 FTE jobs, thereby doubling and potentially tripling the number of jobs on-site.

Residential

- 4.18 The Proposed Development delivers a range and mix of unit types and sizes across all tenures, including social rented and intermediate accommodation. All the proposed units will provide a high quality residential environment which meet and exceed the required standards set out by the GLA Housing SPG.
- 4.19 Table 3.4 below includes details of the proposed residential accommodation.

Table 3.4 – Proposed Mix of Residential Accommodation

Unit Type	Number of Units	Total (%)
Studio	5	11%
1 Bed	12	26%
2 Bed	18	39%
3 Bed	11	24%
Total	46	100%

- 4.20 The proposals include the provision of affordable housing on-site, in the same building as market homes, in accordance with policy. The scheme has been designed to provide 45% of the Gross Internal Area (GIA) of residential C3 floorspace in the Proposed Development as affordable tenures. This equates to the provision of 20 affordable units.
- 4.21 A more detailed breakdown of the units is provided at Table 6.1.

Garden Square Proposals

- 4.22 The garden square is the green heart of the Site. In the current site condition, the garden square is fragmented, inaccessible and neglected. The garden square is to be re-established to reflect the original vision for the Site. Framed by the street on two sides and by building on the other two, the garden square will be restored to its historic position and create a connection between past and future uses of the Site. The confines of the existing garden square measures 2,658m², as surveyed by a heritage expert. The proposed size of the new garden square will be 2,702m², a larger, consolidated and higher quality green space.
- 4.23 Community engagement and activation of the Site is imperative to the success of green space. The garden square will foster a local spirit, through access, management and further interaction with the immediate and wider community. The garden square will be a place for people to gather, socialise, meet, enjoy, rest and relax.
- 4.24 Building on the existing vegetation, the garden square is to offer increased site ecology through the development of a considered planting palette that offers additional habitats, whilst providing a green space for social. Balancing the needs of fauna and people will be achieved throughout the garden square.

- 4.25 Pedestrian circulation around the periphery of the Site is retained and kept clear of street furniture. The surface treatment is upgraded to the highest adoptable standards for the Borough and this surface is extended into the Site to blend the Site into the surrounding context. Pedestrian access is enhanced within the Site through a public path that runs north/south between the building and the garden square.
- 4.26 The path provides an entrance point to the garden square whilst allowing greater permeability of the public space through the block. A low boundary 1.2m high hedge to the garden square and views from within the building ensures passive surveillance of the path.
- 4.27 A formal perimeter path and informal sweeping paths through the lawn and ornamental shrub planting provides pedestrian circulation within the garden square. The garden square is accessible via gated access in three locations, stepped access from Ashburn Gardens and Courtfield Road and an accessible entrance from the path adjacent to the building. The garden square will be publicly accessible to all and security will be ensured as the garden will be locked and access restricted from dusk to dawn. The northern boundary will be contained by a sculptural wall and canopy to protect the garden from Cromwell Road and provide seating opportunities under the cover of the cantilevered canopy.

Wider Public Realm Strategy

- 4.28 The existing wider context for the Site poses challenges and offers opportunities in achieving the kind of sense of place, arrival and destination that is intended to be achieved as part of the overall design concept.
- 4.29 The Proposed Development will achieve a step change in design quality, legibility and coherence, in line with the overall objective of delivering outstanding design quality which is required for all developments in RBKC, particularly tall buildings.
- 4.30 However, the poor condition of the existing streetscape on the key approach routes from Gloucester Road tube station to the Site represents a constraint to achieving the level of wider enhancement and integration consistent with the overall design vision and scheme principles.
- 4.31 Gloucester Road currently provides a relatively limited sense of arrival upon exiting from the London Underground station. The station will continue to be a significant source of public trips to the Site and improving the legibility and overall quality of the key routes from it will make an important contribution to the immediate area.
- 4.32 In the interests of creating a cohesive and legible environment for pedestrians walking to and from the station, it is recommended that landscaping improvements are undertaken to enhance this experience to match the quality that will be created on the Site itself. This enhancement would not only contribute to the establishment of a sense of place, but also contribute to a stronger sense of destination.
- 4.33 Given the fact that the Site comprises an entire urban block, it is considered that the scale of the proposal and the inclusion of a garden square, contributes to the creation of a destination in its own right. There is an inherent physical relationship with the station that forms part of its setting and sense of place. This is something which, if knitted into the townscape of the surrounding area, particularly at Gloucester Road, could provide a comprehensive and unified character in public realm terms, substantially enhancing wayfinding, legibility and the pedestrian experience. We have suggested some design features that could

achieve this in the accompanying Wider Public Realm Strategy which is appended to the Design and Access Statement.

- 4.34 The identified opportunities can be quantified and costed and provided as a financial contribution that can be secured through a Section 106 Agreement. The hard and soft landscaping proposals are suggestions at this stage and are shown indicatively on the accompanying Illustrative Landscape Masterplan.

5. Planning Policy Framework

- 5.1 This section of this Statement sets out the national, regional and local planning policy context relevant to the determination of the Application.
- 5.2 Section 70 of the Town and Country Planning Act 1990 requires regard to be had to material elements of the adopted Development Plan in determining applications. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan

- 5.3 The adopted Development Plan in this case comprises the London Plan (2016) and the Royal Borough of Kensington and Chelsea Consolidated London Plan (2015). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the Borough. There is also a range of topic related Supplementary Planning Documents and Guidance prepared by the GLA and RBKC that is referred to where appropriate.
- 5.4 A full and detailed planning policy section is included within the introductory sections of each of the ES Chapters which list all the relevant policies. This Statement will highlight key policies and material considerations which have informed our consideration of the acceptability of these specific development proposals.

Regional Planning Policy and Guidance

- 5.5 The London Plan is an expression of national policy, tailored to meet London's planning priorities.
- 5.6 The forecasted population growth in London is significantly exceeding previously anticipated levels and the London Plan states that the only prudent course of action is to plan for continued growth. It states that London is in need of more homes in order to promote opportunity and choice for all Londoners.
- Policy 4.1 (Developing London's economy) promotes the growth of a sustainable and diverse economy across all of London, through the provision of sustainable and sufficient workspaces for a range of businesses in terms of size and type.
 - Policy 4.5 (London's Visitor Infrastructure) seeks to enhance the visitor economy through seeking to achieve 40,000 net additional hotel bedrooms by 2036. Importantly, developments should contribute towards the hotel provision target and not result in the loss of strategically important hotel capacity (which the current hotel provides).
 - Policy 3.3 (Increasing Housing Supply) focuses on the importance of Boroughs seeking to achieve and exceed their respective minimum average housing targets and realise brownfield housing capacity. For the Royal Borough of Kensington and Chelsea the adopted annual housing target is 733 homes, with 7,330 new homes expected to be built by 2025. Seeking to increase housing supply .
 - Policy 3.4 (Optimising Housing Potential) and Policy 3.5 (Quality and Design of Housing Developments) reinforces the importance of homes reflecting their surrounding context and character.

- Policy 3.10 (Definition of affordable housing) promote mixed and balanced communities.
- Policy 6.1 (Strategic Approach) seeks to support high density development relative to accessibility and public transport capacity.

5.7 In addition to the policies above, the GLA have published a range of Supplementary Planning Guidance (SPG). The SPGs relevant to this application include:

- Affordable Housing and Viability SPG (2017);
- Housing SPG (2016);
- GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

Local Planning Policy

5.8 The development plan for RBKC comprises the Consolidated Local Plan (2015).

5.9 Alongside the development plan, RBKC have published a range of Supplementary Planning Documents (SPD), some of which are still in draft. These include:

- The Streetscape Guide (2012)
- Access Design Guide (2010)
- Building Height SPD (2010)
- Planning Obligations SPD (2010)
- Transport and Streets SPD (2016)
- Trees and Development SPD (2010)

Planning Policy Designations

5.10 The Site is located within the Courtfield Neighbourhood Area.

5.11 Parts of the Site are designated under the London Squares Preservation Act 1931.

5.12 The Site does not fall within any planning policy designations or site allocations, either at a local or regional level. However, the Site is immediately adjacent to two neighbourhood centres, to the east (Gloucester Road South) and north-west (Cromwell Road Air Terminal) and located in a highly accessible inner London location. The Site fronts onto Cromwell Road which is designated as a red route.

National Planning Policy and Guidance

5.13 The National Planning Policy Framework (NPPF), published 27 March 2012, sets out Central Government planning policies for England and how these are expected to be applied. It is supported by National Planning Policy Guidance (NPPG), launched as an online resource on 6 March 2014, which seeks to provide further detail, clarification and guidance on national policy contained within the NPPF. The NPPG brings together and updates the previous raft of PPG documents into one online resource.

5.14 The national policy framework and guidance is a significant material consideration, in addition to the Development Plan, in the determination of planning applications and is referred to within this statement and

other supporting application documents where relevant and appropriate. The NPPF does not change the statutory status of the development plan as the starting point for decision making (Para 12).

- 5.15 The NPPF sets out a presumption in favour of sustainable development (Para 14). This means that development which is sustainable should be approved without delay. The NPPF also states the importance of identifying opportunities for business growth in particular areas (Para 160). Furthermore, the NPPF emphasises the need for the encouragement of mixed-use developments (Para 37) and the need for a wide choice of high quality homes (Para 47).

Emerging Planning Policy Framework

- 5.16 The GLA is in the process of preparing a new London Plan. The draft London Plan was consulted on between December 2017 and March 2018. The current timetable schedules the Examination in Public (EiP) of the New London Plan for Autumn 2018 with the final London Plan being adopted in Autumn 2019.
- 5.17 RBKC are currently preparing their new Local Plan. On 5 May 2017, the Local Plan Partial Review was submitted to the secretary of state to undergo an EiP. Examination hearings were held in February and March 2018. The current timetable for adoption of the Local Plan Partial Review sought adoption of the updated Local Plan in December 2017/January 2018. The current programme seeks further consultation which is due to occur in May 2018, following local elections.
- 5.18 The Government held consultation on revisions to the NPPF between 7 December 2015 and 11 February 2016. A second consultation on the draft NPPF is currently underway and ended in May 2018. The change to the NPPF, if adopted, would expect Local Planning Authorities in both plan-making and in taking decisions to require higher density development around commuter hubs wherever feasible. The projected adoption of the NPPF has not been announced.
- 5.19 The NPPF (Paragraph 216) sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation:
- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
 - the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 5.20 This Statement refers where appropriate to the draft policies within the draft London Plan, RBKC Consolidated Local Plan Partial Review and NPPF. However, we note that the policies remain of limited weight until examination into each plan by the Planning Inspectorate has been completed.

Neighbourhood Planning

- 5.21 The Application Site is located within the neighbourhood planning area of the Courtfield Neighbourhood Forum.

- 5.22 The Community Forum submitted their application to establish a Neighbourhood Planning Forum in March 2017 and was designated as the boundary of the Courtfield Neighbourhood Area was approved by RBKC in September 2017.
- 5.23 To date there have been no policies drafted to formulate a Neighbourhood Plan.

Garden Squares Act

- 5.24 The majority of the open spaces fronting Cromwell Road and Ashburn Gardens are designated as London Square land under the London Squares Preservation Act 1931.
- 5.25 The London Squares Act restricts development of designated land in Greater London and limits their use to *'ornamental pleasure grounds or grounds for play, rest and recreation'*, and the only buildings and structures allowed are those which are *'necessary or convenient for, and in connection with, the use and maintenance of such squares'*.
- 5.26 Section 4 of the 1931 Act allows the Council to release part of the 1931 Act land in exchange for the setting aside and laying out of other land in substitution. The Council entered into an exchange agreement under Section 4 of the 1931 Act in 1971 to facilitate the construction of the existing hotel.
- 5.27 Whilst this Application seeks works to the garden square, a separate application to re-arrange the existing 1931 Act land at this Site in connection with the scheme for its wider redevelopment is required in relation to the 1931 Act regime, which is separate to planning.
- 5.28 This application, prepared by Dentons UK and Middle East LLP, is submitted alongside the planning application and will also be determined by RBKC in parallel, but separately, to this planning application.

6. Site Suitability and Use

- 6.1 The proposed development is considered to be in accordance with the development plan as it seeks to address regional and local planning policy requirements, as well as national guidance to optimise the use of a brownfield location for the delivery of a mix of uses, particularly the delivery of much needed homes and visitor accommodation.
- 6.2 The NPPF includes a requirement to proactively drive and support sustainable economic development to deliver homes, businesses and infrastructure and thriving places that the country needs; encourage the effective use of land by reusing land that has been previously developed (brownfield land); promote mixed use developments and encourage multiple benefits from the use of land in urban areas; and focus significant development in locations which are or can be made sustainable (Para 17).
- 6.3 At a local level the Consolidated Local Plan Policy CL1 recognises that a comprehensive approach to Site layout and design should be taken where possible, to make best use of the land and improve the appearance of the area.
- 6.4 Comprehensive redevelopment of the Site is required, as the existing building is not suitable for refurbishment due to its inherent structural deficiencies. It is considered that the redevelopment of the Site will improve the aesthetic appeal of the Site and maximise the land use potential of the Site as required by national planning policy.
- 6.5 The Site is not located within a conservation area and the building is not listed. Furthermore, the existing building has previously been identified as an 'eyesore' in RBKC's Core Strategy (2010). An opportunity therefore exists to improve this 'eyesore' with a redevelopment which will improve the visual appearance of the building, optimising the highly sustainable and accessible site with a high quality mixed use development, providing an upgraded hotel offer and residential floorspace.

Visitor Accommodation

- 6.6 The proposals are hotel-led, seeking to provide 749 hotel bedrooms and 340 serviced apartments, all of which fall within Use Class C1.
- 6.7 The London Plan target for visitor accommodation is 40,000 net additional bedrooms across London by 2036 (Policy 4.5). The London Plan seeks to ensure that new visitor accommodation is in appropriate locations. Where hotels are proposed beyond the Central Activities Zone (CAZ), hotel use will be focused in town centres and where there is good public transport areas to central London and international and national transport termini (Policy 4.5).
- 6.8 The site has a PTAL of 6a (Excellent) and is located in a central London location adjacent to two neighbourhood centres, and is within a mixed use area characterised by hotels, apart-hotels, guest houses, retail and residential development. In addition, the London Plan considers that it may be appropriate to locate visitor accommodation related to major visitor attractions of sub-regional or greater significance in other locations. The Site is located within close proximity of the National History Museum, Victoria and Albert Museum and Science Museum to name a few.

- 6.9 Importantly, Policy 4.5 Part B states that developments should contribute towards the hotel provision target and not result in the loss of strategically important hotel capacity (which is defined as hotels comprising 20,000 sqm or more). Consequently, there is a policy requirement to not only protect the current quantum of hotel floorspace, but also to increase the quantum of visitor accommodation.
- 6.10 The Draft London Plan identifies that London needs to build an additional 58,000 bedrooms by 2041, which is an average of 2,230 bedrooms per annum (Paragraph 6.10.2. Draft Policy E10 identifies that out parts of outer London well-connected by public transport whereby hotel accommodation would satisfy the needs of business as well as leisure visitors should be supported.
- 6.11 At the local level, Policy CF8 of the CLP seeks to ensure that the visitor economy is supported through appropriate hotel provision. Policy CF8(c) states that the Council will encourage the upgrading of existing hotels where this will assist in maintain the vitality of the centre; not result in the loss of any residential accommodation; and there will be no material harm to amenity.
- 6.12 Local Partial Plan Review updates Policy CF8, seeking to protect hotels and hotel bedrooms across the borough. In addition, Draft Policy CF8(c) seeks to encourage the upgrading of existing hotels in line with the above.
- 6.13 The principle of hotel use on the Site is already established and is situated in location where intensification is supported on the basis that the Site has a high PTAL rating in close proximity to a Tube Station and popular visitor destinations.
- 6.14 Whilst the Proposed Development will offer 157 fewer hotel bedrooms, the proposals will offer 340 serviced apartments, thereby increasing visitor accommodation by 183 rooms compared to the existing building. There will also be a much greater range of room sizes and types on offer to cater for customer choice and budget. The quality of the hotel will be significantly enhanced which is designed to accommodate an upper 4 / 5 star luxury hotel operator. This will help address the current imbalance in the area which tends to offer a higher proportion of 2 / 3 star hotel accommodation and will create wider economic benefits.
- 6.15 A report prepared by Colliers which evaluates hotel demand has concluded that there is sufficient market demand for an upscale/luxury hotel and a high quality branded serviced apartment product in this particular location.
- 6.16 Therefore, the Proposed Development both protects the current use and results in a net increase in the visitor accommodation provision, meeting London Plan Policy 4.5 and Local Plan Policy CF8.

Housing Provision

- 6.17 The scheme provides 46 residential apartments within the scheme as part of a mixed use development. The principle of residential use at the Application Site is in accordance with the objectives of regional and local planning policy and would help to meet the Borough's housing targets.
- 6.18 Policy 3.3 of the London Plan refers to increasing the supply of new homes and states that the Mayor will seek to ensure that housing need is met. It recognises the pressing need for more homes in London. Policy 3.3 also encourages Boroughs to seek to achieve and exceed their minimum annual average housing targets. In

addition, it states that Boroughs should realise the potential opportunity for brownfield housing capacity to be brought forward.

- 6.19 In defining the strategic approach to increasing housing provision, Policy 3.3 and Table 3.1 set a target of a minimum 733 additional homes a year to be provided within the Royal Borough between 2015 and 2025, with new housing schemes required to maximise the potential of Sites (Policy 3.4), be well-designed (Policy 3.5) and provide a range of units to minimum space standards (Table 3.3 and Policy 3.8).
- 6.20 At the local level, the Consolidated Local Plan states at Policy CH1 that the Council will make provision for a minimum 350 net additional dwellings a year. This figure is less than the figure within the London Plan and the target of 733 net additional units identified in the London Plan, which is reflected within draft Policy CH1 (RBKC Local Plan Partial Review).
- 6.21 It should be noted that RBKC have has a persistent under supply of homes over the past years and as such are required, as per the NPPF, to provide a buffer of 20% to their housing target. As such, the annual requirement for net additional homes in RBKC is 888 new homes.
- 6.22 The Site is a brownfield site in a highly sustainable location, which seeks to provide a mixed use development incorporating employment and residential uses as per the aspirations of the Development Plan, the NPPF and the emerging policies Draft New London Plan and Local Plan.
- 6.23 The scheme provides a total of 46 net additional residential apartments within a mixed use, hotel-led development. The redevelopment provides the opportunity to reinstate the residential use and character on this corner of Ashburn Place and Courtfield Road which existed 50 years ago. The reintroduction of this use reflects the residential character on the opposite side of Courtfield Road and further to the south, replacing the current coach and taxi parking and drop off area.
- 6.24 This level of provision will make an important contribution to the Council's housing targets and complement the surrounding character of the area.

Residential Mix

- 6.25 The NPPF requires local planning authorities to deliver a wide choice of high quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand (Para 50).
- 6.26 London Plan Policy 3.8 states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of mix of housing sizes and types.
- 6.27 At local level Policy CH2 of the Consolidated Local Plan requires new residential development to include a mix of types, tenures and sizes of homes to reflect the carrying needs of the borough, taking into account the characteristics of the site. This is reflected within Draft Policy CH3 of the Local Plan Partial Review.
- 6.28 The latest evidence base for housing need is the Strategic Housing Market Assessment (SHMA) which indicates the requirement for a 50/50 split between smaller (1-2 bedrooms) and larger (3-4+ bedroom) units for market housing and 70/30 split between smaller and larger units for the affordable tenure housing.

6.29 The proposed unit mix and tenure of residential accommodation is provided in Table X below:

Table 6.1 – Private and Affordable Residential Mix

Unit Type	Private Market			Intermediate			Social Rent		
	Unit No's	Total %	SHMA Target	Unit No's	Total %	SHMA Target	Unit No's	Total %	SHMA Target
Studio	4	15.4%	-	1	11.1%	-	0	-	-
1 Bed	7	27%	23%	3	33.3%	49%	2	18.2%	49%
2 Bed	11	42.2%	29%	4	44.5%	21%	3	27.3%	21%
3 Bed	4	15.4%	30%	1	11.1%	15.5%	6	54.5%	15.5%
4 Bed	0	0%	18%	0	0%	14.5%	0	0%	14.5%
Total	26	100%	100%	9	100%	100%	11	100%	100%

6.30 As demonstrated by the table above, the Proposed Development will provide a wide range of housing choice in terms of the size of units across all tenures. The residential component will provide 5 x studios (11%), 12 x 1 beds (26%), 18 x 2 beds (39%) and 11 x 3 beds (24%) in total as shown in Table 4.4. There is clearly a broad range which has been split in reasonable proportions, with the final mix being influenced by the dimensions of the plot and the need to ensure the minimum sizes are achieved (and exceeded if possible).

6.31 In summary, the mix of units across the tenures is broadly comparable and it is understood these SHMA targets are intended to be used as a guide rather than be applied rigidly. The mix of units was supported by officers at the pre-application stage.

Affordable Housing

6.32 The NPPF outlines the Government's support for the delivery of a wide choice of high quality homes across all tenures and sizes, including the provision of affordable homes (Para 50). It also states that planning authorities should have regard to viability and the costs of any requirement such as affordable housing, as proposals should provide competitive returns to a willing land owner and willing developer to enable the development to be delivered (Para 173). Proposals should not be subject to such as scale of obligations and policy burdens that their ability to be developed viably is threatened.

6.33 Policy 3.11 of the London Plan states that affordable housing provision should be maximised and that an annual average of at least 13,200 more affordable homes should be sought. It requires that affordable housing should be split 60% social/affordable rent and 40% intermediate rent or sale and that priority should be given to provision of affordable family housing.

6.34 Policy 3.12 of the London Plan states that the 'maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes'. It sets out a preference for the on-site delivery of affordable housing noting that offsite provision of a cash payment in lieu will only be acceptable in exceptional circumstances.

- 6.35 At a local level, Policy CH2(k) requires developments to provide affordable housing at 50 per cent by floor area on residential floorspace in excess of 1,200 sq.m gross external area, unless exceptional circumstances exist.
- 6.36 Draft Policy CH2 of the Local Plan Partial review states that the Council will seek the maximum reasonable amount of affordable housing. To achieve this, residential floorspace greater than 650 sq.m of gross residential floorspace (gross internal area) will be required to deliver 35% of the floorspace as affordable. The preference for tenure split is 50% social rent/affordable rent and 50% intermediate. Policy CH2(d) states that affordable housing will be sought in the first instance on-site unless exceptional circumstances justified by robust evidence exist which support provision off-site or providing a payment in lieu.
- 6.37 The Affordable Housing SPG (2017) and Draft London Plan (2017) introduce the threshold approach to development proposals which are capable of delivering more than ten units. The threshold level of affordable housing is set at 35% of new homes (by habitable room) to be delivered as affordable on-site. Where development proposals provide affordable housing greater than the threshold, developments are able to follow the Fast Track Route. Fast tracked applications are not required to provide a viability assessment at application stage.
- 6.38 The Development proposes to provide 20 affordable units in total, which equates to 45% new affordable homes based on floor area (GIA). The affordable homes will be offered with a 60% Social Rented and 40% Intermediate tenure split, calculated by floor area. The larger 3 bedroom units have been allocated to the social rented tenure as requested by officers.
- 6.39 This proposed provision is significantly higher than the 35% target set out in the emerging guidance and should be viewed as a significant planning benefit of the Proposed Development. On a unit basis, the affordable tenure is 55/45% in favour of Social Rented, which broadly accords with the emerging policy requirement of 50/50%.
- 6.40 The proposed quantum and tenure of the affordable housing offer therefore meets and exceeds the policy requirements and meets the criteria to take advantage of the Fast Track Route, as defined by the GLA. However, a Viability Assessment is submitted with the application which demonstrates that while the Proposed Development would not reach the currently adopted 50% affordable housing target, it will deliver the maximum reasonable amount.

Residential Quality

- 6.41 The Development will deliver high quality new homes of an exemplar standard. Policy 3.5 of the London Plan states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 6.42 In addition, Policy 3.5 states that Local Development Frameworks should incorporate minimum space standards that conform to those set out in the London Plan and the Housing SPG (2012); which is now replaced by the Housing SPG (2016).
- 6.43 Local Plan Partial Review Policy CH3 states that new residential developments should be designed to meet the housing standards on space and access as set out in the London Plan. Local Plan Partial Review Draft

Policy CH1 seeks to optimise the number of residential units delivered in new developments by taking into account the relevant range within the London Plan density matrix in order to restrict very large units.

6.44 All units will exceed the minimum space standards set out in the Housing SPG, 10% will be Wheelchair Accessible Homes and comply with Secure by Design Standards (London Plan, Policy 3.8). A schedule is included in the Design and Access Statement which demonstrates compliance with the residential standards.

6.45 The residential apartments will not exceed 7 apartments per core, will be designed to have generous floor to ceiling heights at 2.7 metres and there will be no north facing single aspect apartments.

Residential Density

6.46 The Development seeks to optimise the use of land in order to contribute towards a pressing need for housing and to also provide a high quality public realm. In relation to delivering new housing, the NPPF advises that local authorities should set out their approach to housing density to reflect local circumstances (Para 47). It also outlines that planning policies and decisions should aim to ensure that developments optimise the potential of sites to accommodate development (Para 58).

6.47 Density ranges for new residential developments are set out in the London Plan and relate to the accessibility of sites (Table 3.2). Policy 3.4 of the London Plan states that development should optimise housing output for different locations within the relevant density range.

6.48 The Site has an excellent PTAL rating of 6a. In accordance with Table 3.2 of the London Plan, the Application Site is located within a 'Central' setting. The guidance in the London Plan is that residential densities should be between 650 and 1100 habitable rooms per hectare (hr/ha) and up to 405 units per hectare (u/ha) in this location.

6.49 The Draft London Plan removes the density matrix within the adopted London Plan. Draft Policy D6 notes that development proposals 'must make the most efficient use of land and be developed at the optimum density'. The optimum density of a development is expected to consider the following:

1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure.

6.50 Draft Policy D6 goes on to state that the higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Draft Policy D4 Housing Quality and Standards, and the proposed on-going management.

6.51 The detail of the management and design, including housing quality and standards, is discussed in detail within the Design and Access Statement prepared by Simpson Haugh and Partners.

6.52 At a local level Policy CL1 requires the density of development to be optimised and sensitive to the developments context and the density of development should be the outcome of a design process rather

than the starting point. This has very much been the case here, as the process has been design-led from the outset in consultation with the Council, local residents and other key stakeholders.

- 6.53 The '*Consultation on proposed change to national planning policy*' indicates that the Government is seeking to encourage high density developments around the commuter stations where feasible. Gloucester Road Station is a public transport interchange and by virtue of the attributes discussed within other sections, the Development Site is considered suitable for a building of this scale.
- 6.54 The Mayor of London's Housing SPG (2016) identifies that there is scope for higher density development beyond the matrix set out in the London Plan in particular circumstances. It is essential that such development is built to a high standard and enhances both the public and the private realm and is based on local circumstances. The Housing SPG also provides additional guidance on calculating residential density and in reference to the London Plan density matrix notes that this is '...only one part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes'.
- 6.55 The Housing SPG states that for the purposes of the London Plan, 'optimisation' can be defined as 'developing land to the fullest amount consistent with all relevant planning objectives'.
- 6.56 The SPG states further that 'It is essential, when coming to a view on the appropriate density for a development, that proper weight is given to the range of relevant qualitative concerns ...' (Paragraph 1.3.9) and that 'Conversely, greater weight should not be given to local context over location or public transport accessibility unless this can be clearly and robustly justified. It usually results in densities which do not reflect scope for more sustainable forms of development which take best advantage of good public transport accessibility in a particular location' (Paragraph 1.3.10).
- 6.57 Paragraph 1.3.50 of the Housing SPG states that 'meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with good public transport access. Consequently, the London Plan recognises the particular scope for higher density residential and mixed use development in town centres, opportunity areas and intensification areas, surplus industrial land and other large sites'. With specific relevance to the Site, the Housing SPG states that 'Densities in opportunity areas and on other large sites may exceed the relevant density ranges in Table 3.2 of the London Plan'.
- 6.58 The Housing SPG states further that 'In appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed'. The Housing SPG states that schemes exceeding the density matrix should be of a high design quality and should be tested against a number of considerations, including:
- Local context and character, public transport capacity and the design principles set out in Chapter 7 of the London Plan;
 - The location of a site in relation to existing and planned public transport connectivity (PTAL), social infrastructure provision and other local amenities and services;
 - The need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in the SPG;

- Overall contribution to local 'place making', including where appropriate the need for 'place shielding';
- Depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
- The residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location;
- The need for the appropriate management and design of refuse/food waste/ recycling and cycle parking facilities; and
- Whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (e.g. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites).

6.59 Generally, development should maximise the housing output while avoiding any of the adverse symptoms of overdevelopment, including:

- inadequate access to sunlight and daylight for proposed or neighbouring homes;
- sub-standard dwellings (size and layouts);
- insufficient open space (private, communal and/or publicly accessible);
- unacceptable housing mix;
- unacceptable sense of enclosure or loss of outlook for neighbouring occupiers;
- unacceptable increase in traffic generation;
- detrimental impacts on local social and physical infrastructure; and,
- detrimental impacts on visual amenity, views or character of surrounding area.

6.60 All of the above aspects of the development have been satisfactorily addressed within this Statement and other supporting documents (including the EIA) and demonstrate that the proposals do not exhibit symptoms of overdevelopment.

6.61 Based on a site area of 0.76 Hectares (Ha) and 46 residential units and 129 habitable rooms, the residential density equates to 60 u/ha or 170 hrha. Proportionally, the residential floorspace comprises approximately 8% of the total site area, measuring 0.083 Ha. Using this approach, the 'net' residential density equates to approximately 2036 hrha or 726 u/ha.

6.62 The net residential density is in excess of the current London Plan density matrix, however, the draft London Plan is advocating a more design-led approach that considers the site context, location, infrastructure and with a greater focus on quality of design.

6.63 The existing context comprises a building of significant scale and therefore it is inevitable that a larger building is required to replace it in order to make the scheme financially viable. The development has been design-led from the outset and the scale and massing of development has been accepted in principle during the pre-application consultation process with officers. It is considered that the design is of the highest quality and there are no symptoms of overdevelopment.

6.64 In summary, the overall regenerative benefits of the proposal would be substantial and it is considered that the Proposed Development optimises the use of the Site to help deliver the Borough's housing and visitor accommodation targets. A development of this density will make an important contribution to addressing the pressing and desperate need for new housing in the Borough and London as a whole. Therefore the proposed density is considered appropriate and in accordance with current and emerging planning policy.

Private Amenity Space

6.65 The Mayor's Housing SPG outlines that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant.

6.66 All apartments are provided with private amenity space which as a minimum meets the Housing SPG. All of these amenity spaces are designed as winter gardens which mean that residents can use the space more frequently than a traditional open balcony as the space is protected from wind and rain through the use of single glazed external skin which can be open for natural ventilation and closed to trap the winter sun if desired.

6.67 In addition to the private garden at ground floor level the stairs and lifts for both cores extend to roof level and provide access to a garden space which is landscaped with hard and soft areas and includes some child play space. The area is not segregated into affordable and private areas, it is accessible to both tenures as an amenity for all. Of course the residents will also benefit from the large new London Garden Square they will share the city block with.

7. Design Matters

7.1 This section should be read in conjunction with a number of supporting application documents including the application drawings, Design and Access Statement (DAS), Environmental Statement (ES) and the Townscape and Visual Impact Assessment (TVIA).

Design Principles

7.2 The NPPF (Section 7) states that good design is *'a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people'*.

7.3 Paragraph 58 of the NPPF emphasises how development should *'respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'*. The NPPF considers that planning policies and decisions should not attempt to impose architectural styles or particular tastes whilst ensuring that local distinctiveness is retained (Para 60). Furthermore, Paragraph 63 states that great weight should be given to outstanding and innovative design which will help to raise the standard of design more generally in the area.

7.4 London Plan Policy 7.6 of the London Plan states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.

7.5 At a local level, Policy CL1 *'requires development to respond to the local context'*. In addition, Policy CL2 requires development to be locally distinctive, responding to local context. Part (b) of Policy CL2 states that the Council will require *'an appropriate architectural style on a site-by-site basis, in response to:*

- *the context of the site;*
- *the building's proposed design, form and use; and*
- *whether the townscape is of uniform or varied character.*

7.6 The design development process has been driven by a desire to create a building of exceptional architectural quality, and an exemplar mixed-use urban scheme, providing new homes and jobs, and proving active and sustainable new uses.

7.7 The proposals are intended to be a contextual response to the specific constraints and opportunities that the site offers, in order to deliver a considered and appropriate scheme that is fully integrated into its context. As the design has developed, several key architectural ambitions emerged and these are summarised as follows;

- *To create an urban design arrangement that 'repairs' the damage to the urban fabric caused by the geometry of the 1972 Richard Seifert building.*
- *Establish a design that improves the public realm by creating an appropriate setting for the re-creation of a traditional Garden Square and the creation of a place and environment that is comfortable, safe and desirable for local residents and visitors.*

- *To produce a massing arrangement that increases the overall floor area on the site, in line with the client's brief, that minimise its impact to local residents by concentrating it towards Cromwell Road on the north east corner of the site.*
- *Minimise the disruption to the site and the established existing trees by limiting the extent of the basement to the current footprint.*
- *To produce an elegant contemporary architectural language that is sympathetic to the materiality of the context using materials of high quality that will endure and develop with age.*

Tall Buildings

- 7.8 The NPPF considers that good design, which includes the design of taller buildings, is a key objective of delivering sustainable development. The NPPF also includes a requirement for local planning authorities to ensure that proposals optimise the potential of sites to accommodate development (Para 58).
- 7.9 The tall buildings guidance paper prepared by CABE and English Heritage, *Guidance on Tall Buildings (2007)* recognises that in the right place, tall buildings can make a positive contribution to city life. The document provides advice and good practice guidance in relation to tall buildings and states that all proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building.
- 7.10 London Plan Policy 7.7 states that tall and large buildings should generally be limited to sites within the CAZ, Opportunity Areas, areas of intensification or town centres that have good access to public transport. Furthermore, tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm. The policy promotes the improvements of legibility of an area and requires proposals to incorporate the highest standards of architecture and materials, including sustainable design and construction practices. The policy seeks to ensure that tall and large buildings contribute to improving the permeability of the Development Site and the wider area, which the proposed development seeks to do. Policy 7.7 states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing etc.
- 7.11 In addition, Policy 7.7 states that particular consideration should be given to tall building proposals in sensitive locations, including 'conservation areas, listed buildings and their setting'. Furthermore, tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm. The policy promotes the improvement of legibility of an area and requires proposals to incorporate the highest standards of architecture and materials, including sustainable design and construction practices.
- 7.12 Policy CL12 'building heights' requires new buildings to respect the setting of the borough's valued townscapes and landscapes, through appropriate building heights, and states that to deliver this the Council will require proposals to strengthen our traditional townscape in terms of building heights and roofscape by requiring developments to:
- *reflect the prevailing building heights within the context;*
 - *provide, for larger developments, a roofscape that reflects that of the context of the site;*

- *seldom use height to express local landmarks so the prevailing building height is maintained;*
- *resist buildings significantly taller than the surrounding townscape other than in exceptionally rare circumstances, where the development has a wholly positive impact on the character and quality of the townscape;*
- *require full planning applications for any building that exceeds the prevailing building height within the context.*

7.13 In respect of views, Policy CL11 requires all development to protect and enhance views, vistas, gaps and the skyline that contribute to the character and quality of the area. It states that to deliver this, the Council will:

- *resist development which interrupts, disrupts or detracts from strategic and local vistas, views, and gaps and the skyline;*
- *require developments whose visual impacts extend beyond that of the immediate street, to demonstrate how views are protected or enhanced.*

7.14 The existing building is the second tallest building in the Borough at 14 metres lower than the 98m Trellick Tower in North Kensington. It is described in the September 2010 SPD, 'Building Height in the Royal Borough' as 'a highly prominent, bulky building' that 'does not relate to its immediate context'.

7.15 The scheme has been fully assessed by the accompanying Townscape and Visual Impact Assessment. The selection of views that have been assessed concentrate on those locations from which the existing building on the Site is particularly visible. It should be noted that they are not typical of the experience of walking around the Site's surroundings; despite the size of the existing building, the prevalent urban pattern is such that there is little or no visibility of it from most of the local and wider area. Visibility is largely from along a number of roads that align on the Site and across open spaces.

7.16 The Assessment concludes that the height and scale of the Proposed Development would be similar to that of the existing building on Site, and consistent with the scale of other buildings in the area around Cromwell Road. The location of the Proposed Development further north on the Site than the existing building is such that its apparent height and scale would be noticeably greater than that of the existing building in some views; however, this would be by a matter of degree rather than by an order of magnitude. Where there is a contrast in scale between the Proposed Development and lower scale buildings nearby, this would be of a fundamentally similar nature to the existing building on Site.

7.17 The division of the Proposed Development into three blocks would help to break up its overall scale and, together with the overhanging of parts of the podium by the towers, would provide it with a distinctive overall form. The location of the massing across the Site would represent a logical and thoughtful response to context; there would be an ordered progression in the height of the blocks towards the north of the Site and the main road of Cromwell Road, with the towers located away from the southern end of the Site, which would be addressed by the 7 storey residential part of the Proposed Development.

7.18 It concludes that the Proposed Development would enhance the range of short, medium and long range views in which it would be seen, and would have a beneficial effect on its own and adjacent Townscape Character Areas and that it would be in line with national, regional and local planning policy in respect of

townscape and design matters as a result of its high quality architecture and urban design (discussed in more detail below).

Architectural Quality

- 7.19 The NPPF seeks to promote sustainable development through economic growth, promote good quality living through design and sustainable environments, and conserve and enhance the historic environment. Paragraph 63, with regards to requiring good design, states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.
- 7.20 Policy 7.6 of the London Plan states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 7.21 At the local level, Policy CL1 of the Consolidated Local Plan requires all development to respect the existing context, character and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all.
- 7.22 CL1(a) requires 'development to contribute positively to the townscape through the architecture and urban form, addressing matters such as scale, height, bulk, mass, proportion, plot width, building lines, street form, rhythm, roofscape, materials and historic fabric as well as vistas, views, gaps, and open space', and part (b) requires 'development to respond to the local context', and CL1(c) requires the density of development to be optimised.
- 7.23 Policy CL2 states that the Council will require all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.
- 7.24 In RBKC's previous Core Strategy from 2010, the current hotel was labelled an 'eyesore', defined by the Plan as '*A building that because of its scale, height or massing greatly disfigures the wider townscape, creating a very unpleasant sight*'. The building is visually unappealing, built for purpose and function rather than aesthetic appeal.
- 7.25 The challenge has been to replace the bulk and massing of the existing building with an arrangement that is more sympathetic to 'its immediate context' in a style that responds to local character and appearance and to do this alongside the creation of a London Garden Square.
- 7.26 It is considered that the Proposed Development has met that challenge and fully accords with the above policies. The building is of a high architectural quality designed by an award winning practice. The building is of a form and positioning that would relate well to the urban structure of the surrounding area and would provide a coherent and high quality garden space that will greatly enhance its setting. It would be a substantial improvement compared to the existing situation on the Site.
- 7.27 The basic massing arrangement of a podium with two taller elements has been articulated to generate the following benefits:

- *A clear articulation of taller elements, which address the wider City, and the podium which address the neighbouring streets.*
- *A reference to the non-rectilinear geometry of the Cromwell Road and Ashburn Place.*
- *A clear legibility to the expression of the different functions within the development.*
- *Elegant proportions of the overall formal composition.*
- *A visual ordering of the tower that is influenced by it's context.*

7.28 The articulation of the towers as distinct elements is achieved by off-setting them in plan from the podium. The massing is articulated further through two key concepts: the use of cut-backs on the north-western and south-western corners of the two taller elements; and the use of an expressed horizontal every two storeys. These devices add elegance to the overall proportions of the composition as well as further allowing the taller elements to feel that they 'hover' above the podium when from either Courtfield Road/Ashburn Gardens or Cromwell Road. The two storey grid with recessed facades in between allows for a range of contextually appropriate materials to be used that express the different building functions within a controlling order. This horizontal 'grain' is a reference to the string course of the neighbouring buildings in the Borough.

7.29 The layout on the Site of the rectilinear podium and towers above on the eastern part of the Site, facing Ashburn Place, Cromwell Road and Courtfield Road, together with that of the proposed garden square on the western part of the Site, would result in a more natural and efficient use of the Site and would relate well to the urban form of the surroundings. The location of a built edge at the back of pavement (or slightly set back from it) on Cromwell Road and Ashburn Place would allow these streets to be better defined and animated by ground floor uses. The consolidation of green space on one part of the Site would allow it to become a usable and much more coherent space than that which currently exists.

7.30 The projecting floor slabs would provide an overall sense of order within the elevations. In the taller elements, this would combine with the vertical alignment of bays to provide the elevations with a regular and gridded quality, creating a strong expression and elevational rhythm. The projection of the floor slabs and the angled nature of the bays would provide visually interesting depth and articulation to the facades. The use of a limited palette of natural, high quality materials, and the regular nature of the elevations, would be such that the Proposed Development would have a relatively simple and restrained appearance overall.

7.31 The design has integrated highly articulated elements of patterned and crafted forms to window reveals and balcony supports found in neighbouring buildings, including decorative soffits and bay windows.

7.32 In summary, it is considered that the building is of the highest architectural quality that meets the various Development Plan design policies. More detail on the overall architectural composition and individual components of the building is comprehensively described in the Design and Access Statement and shown on the accompanying drawings.

Heritage

7.33 Section 12 of the NPPF deals with conserving and enhancing the historic environment. It applies to the heritage-related consent regimes under the Planning (Listed Buildings and Conservation Areas) Act 1990,

plan-making and decision taking. The NPPF requires an applicant to describe the significance of a Heritage Asset affected by a proposal, including any contribution by their setting (Para 128) assessing impact. The more important the asset, the greater the weight should be given to its conservation. Where a development proposal will lead to 'less than substantial' harm to the significance of a designated Heritage Asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (Para 134).

- 7.34 London Plan Policy 7.8 states that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details'.
- 7.35 Policy CL3 of the Consolidated Local Plan requires development to preserve and take opportunities to enhance the cherished and familiar local scene, requiring development to 'preserve or enhance the character or appearance of the conservation area and protect architectural or historic interest of the area and its setting'. Policy CL4 on 'Heritage Assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology' aims to protect these heritage assets from negative impact occurring from inappropriate alterations and neighbouring development which could 'diminish the architectural and historic value and detract from their setting'.
- 7.36 A full assessment of the impacts of the Proposed Development on the surrounding Built Heritage is included within Volume II of the Environmental Impact Assessment. In summary, it is concluded that the existing building on the Site does not contribute to the heritage significance of the identified heritage assets (HAs), and instead detracts from them where they are experienced in the context of it. The Proposed Development therefore would constitute a significant enhancement.
- 7.37 The local and wider context within which the identified HAs are experienced is largely Victorian development with some 20th century developments, including the existing building on the Site. The setting of listed buildings is often limited within the extent of the conservation area they belong to. The Site and a number of urban blocks around it have been subject to significant change since many of HAs were built in the 19th century, and the context of many HAs includes post-war, modern and large scale development. In respect of the conservation areas considered, these are located within a, mostly, 19th century urban context, but also near the substantial post-war developments on and around the Site, which as existing, do not contribute to their heritage significance.
- 7.38 The Assessment concludes that once the Proposed Development is completed and occupied, there would be no adverse effects (no harm to heritage significance) and would constitute a significant enhancement.
- 7.39 From a design perspective, it is important to note that the use of white stone panels and brick would complement the materiality of nearby historic development. The scale of the podium, including that part occupied by the residential element at the southern end of the Site, would be seen to relate well to that of adjacent existing buildings. In many ways, the design has sought to make gestures and references to the nearby historic environment, responding positively to national, regional and local heritage policies.

The Garden Square

- 7.40 The NPPF (para. 58) seeks to ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. It is therefore important to ensure that the development interacts well with the public realm and provides a sense of place.
- 7.41 Policy 7.18 of the London Plan which states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area.
- 7.42 Policy CR 5 of the CLP resists development that would result in either the loss of existing public open space or would have an adverse effect on garden squares and communal gardens.
- 7.43 The landscape offer has been prepared in the context of the requirements of the London Plan (Policy 7.6) and seeks to provide high quality outdoor spaces which will integrate well with the surrounding streets and open space. Policy CR 6 requires landscape design to:
- Be fit for purpose and function;
 - Be of a high quality and compatible with the surrounding landscape and townscape character;
 - Clearly defined as public or private space; and
 - Optimise the benefit to wildlife habitat.
- 7.44 As previously highlighted, parts of the current landscaped area that was once laid out as a formal garden square has been lost in all but name. The existing green space is fragmented across different areas of the Site, interrupted by poorly designed subterranean features (such as fire escapes and ventilation equipment) with restricted access making it largely inaccessible to the public. It is also of a low ecological quality.
- 7.45 The proposal to reinstate the garden square in form that resembles the original 1890 layout has been an integral driver to the overall design approach from the outset. This represents a rare and exciting opportunity which will be one of the first of its kind in London during recent times. The new garden measures 2,702 sqm which is larger in size than the area currently designated as a London Square following the execution of the 1971 deed. The garden will be substantially more usable and attractive than the existing disparate green spaces located around the existing building and offers enormous public realm and urban design benefits.
- 7.46 The new Ashburn Garden Square is based on a traditional London garden square. Inspired by the arrangement and function of a London garden square, the layout of the spaces references the traditional form and intent with contemporary additional details. The garden square benefits from being situated within a similar context to many of London's great garden squares with existing mature London Plane trees, terraced housing lining two edges of the garden square, and now with the proposed high quality hotel and residential development framing the 4th side. The design builds upon and develops this landscape character with subtle geometry and landscape interventions.
- 7.47 It is intended that the garden square will be delivered and maintained by the owner, who welcomes the opportunity to share the future management of the garden square with local residents and resident groups (including the Ashburn Garden Square Garden Association (AGSGA) and the Ashburn and Courtfield Garden Residents Association (ACGRA)). This will ensure that it is successful over the long term.

- 7.48 A Draft Open Space Management Plan has been submitted with the application to demonstrate a commitment to this joint management approach. It proposes to set up a Management Committee that will be made up of these groups and local residents alongside the hotel owners to ensure that the garden is:
1. Maintained to a high standard that positively contributes to the quality of the local environment in line with principles of good estate management and cost-efficiency;
 2. Safe and secure for users of the Open Space, hotel and homes within the development;
 3. Publicly accessible from dawn to dusk, subject to closures necessary for security, maintenance and cleansing purposes.
- 7.49 It is proposed that an Open Space Specification for the garden will be approved under the conditions attached to the planning permission which will be audited thereafter by the Management Committee.

Public Realm, Open Space and Amenity Space

- 7.50 The NPPF recognises that access to high quality open spaces can make an important contribution to the health and well-being of communities (Para 73).
- 7.51 Policy 3.5 of the London Plan seeks to enhance the quality of local places by ensuring that new housing developments take into account the provision of public, communal and open spaces. Children and young people should have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery (Policy 3.6).
- 7.52 Baseline Standard 1.2.2 of the Mayor of London's Housing SPG (2012) supports Policy 3.6 and reiterates that for developments with an estimated occupancy of 10 children or more, development proposals should make appropriate play provision, in accordance with the Providing for Children and Young People's Informal Recreation SPG. This states that children's play space should be provided in new developments with a standard target of 10 sqm per child.
- 7.53 Policy CR 5 of the CLP requires all major development (outside a 400m radius of the closest entrance to the nearest public open space) to make provision for new open space which is suitable for a range of outdoor activities for users of all ages (which may be in the form of communal garden space), on-site external play space, including for under fives based on expected child occupancy (part e) and require all green open space to optimise biodiversity and wildlife habitat (part f).
- 7.54 In addition the garden square which will be accessible to all, the Proposed Development will provide a total 637 sqm of communal open space for the new residents, 193 sqm within a private residents garden at street level fronting onto Courtfield Road and 444 sqm of communal space at roof level. The playspace standards defined by the Mayor's SPG will be met for all age groups, comprising 288 sqm of the area within the communal roof garden.
- 7.55 With regard to the hotel and serviced apartments, there are roof top areas of open space that will be made accessible to guests.

8. Transport, Access and Movement

- 8.1 This section assesses the key transport aspects of the proposal and should be read in conjunction with the Transport Assessment (TA) prepared by WSP which is submitted in support of the application.
- 8.2 At all levels within planning policy there is a strong presumption in favour of reducing the need to travel, particularly by private car, and encouraging more sustainable modes of transport, this has been the approach adopted by the Development. The Site has a Public Transport Accessibility Level (PTAL) of 6a (Excellent) which is the highest achievable.
- 8.3 Section 2 of the TA provides a detailed assessment of relevant planning policy for transport and highways. In summary, the Proposed Development is suitably located and designed to maximise the potential for sustainable travel and minimise impacts on the local transport networks through appropriate access, public realm, parking and servicing strategies. The Proposed Development is therefore sustainable and appropriate in principle. This section demonstrates that the proposals full accord the current transport policy guidance and parking standards.

Access and Layout

Pedestrian Access

- 8.4 The Proposed Development reconfigures the existing and fragmented London Square to form a single rectilinear space located in its historic position at the southwest corner of the Site, with a new pedestrian north-south route connecting to the wider pedestrian network, thereby enhancing permeability in the area.
- 8.5 There would be several pedestrian entrances to the buildings with separate accesses to the hotel and residential parts of the development that provide convenient access from different directions. The main hotel entrances are located on Cromwell Road and Ashburn Gardens, and the residential access is taken from Courtfield Road via a private communal garden, for use exclusively by residents.

Main Vehicular Pick-up / Drop-off

- 8.6 The vehicle access strategy has been considered in context of the existing access arrangement and the architectural vision for the scheme. One of the outcomes from the consultation exercise was that the existing vehicular access to the hotel should ideally be relocated away from the residential street at Courtfield Road and moved closer to more heavily trafficked area of Cromwell Road. This would improve residential amenity for the large majority of residential properties around the Site, particularly those that currently face the busy drop-off and pick-up area.
- 8.7 The main vehicular access has therefore been relocated to the northwest corner of the Site to accommodate car and taxi drop-off and pick-up, with access via Ashburn Gardens. Existing hotels and serviced apartments face onto this drop off rather than permanent residential. The drop-off would be a pedestrian friendly shared space using high quality surfacing materials and landscaping. The drop-off has been adequately sized to meet peak travel requirements, with 9 vehicles being able to occupy the space at

any one time. This was amended in response to the highway officer's advice and is more than sufficient to meet the requirements of the hotel at peak times.

- 8.8 Vehicles coming from the east would now be able to turn left directly from Cromwell Road and exiting vehicles can turn right back onto Cromwell Road. This is a significant improvement compared to the current scenario. Currently, vehicles use Ashburn Place and Harrington Gardens to reach the Courtfield Road access, which is more residential in nature.
- 8.9 Vehicles coming from the west are prohibited from turning right from Cromwell Road onto Ashburn Gardens. Vehicles travelling from the west would therefore travel via Knaresborough Place and Courtfield Road, which is the same as the current situation.
- 8.10 It is proposed to relocate the two existing taxi spaces on Courtfield Road to the northern section of Ashburn Gardens, and also provide an additional on street taxi space to serve the drop off. Again, these spaces have been positioned so they do not have any permanent residential properties facing them. Moving the taxi spaces away from the existing residential properties is considered to be another benefit of the revised access arrangements.

Coach Pick-up / Drop-off

- 8.11 A coach drop-off facility is provided on site accessed via Ashburn Place and accommodates two 12m coaches and would operate one-way northbound. Due to the significant space required to turn coaches, a parallel drop-off arrangement is proposed as well as space for coaches to drop-off adjacent on Ashburn Place.
- 8.12 The drop-off would provide a shared use surface, enhancing the public realm. Bollards will be placed between the footway and drop-off space to demarcate the spaces. This area can also be used for other vehicle and taxi pick-ups and drop offs when not in use by coaches. Following conferencing events at the hotel, staff will direct guests to specific areas for collection. Staff will be situated at both drop-offs to ensure that guest departure is managed appropriately and efficiently. The proposed management arrangements are set out in the accompanying Management Plan.

Servicing and Parking Access

- 8.13 It is proposed to access an off-street servicing yard at the east of the building via Ashburn Place. The proposed arrangement enables all vehicles to travel in a forward gear when accessing and egressing the site. The current building is also accessed from Ashburn Place, but has two crossovers and requires vehicles to reverse on and off the public highway.
- 8.14 This includes access to car parking in the basement. An automated parking system is provided within the basement with access via car lift from Ashburn Place. The parking spaces are provided for both the residential and commercial elements of the building. Residential and employee cycle parking will be provided on site accessed via dedicated cycle lifts from Ashburn Place.

Car Parking

- 8.15 Car parking at the proposed development will be provided in line with RBKC standards. A total of 48 car parking spaces will be situated at basement level within an automated stacker system, accessed via a car lift located on Ashburn Place, to the south of the servicing yard. This a reduction by more than 50% compared to the current level of provision.

Table 7.1 Car Parking Provision

	Adopted London Plan (Maximum)	Adopted RBKC Consolidated Local Plan (Maximum)	Proposed Development Provision
Residential	17	23	23
Hotel Long Stay	35	28	25
Total	52	51	48

- 8.16 This level of provision will allow 50% of the residential properties to have access to a car parking space which is within the maximum parking standards. Electric car charging facilities will be provided within the automated stacker in line with London Plan standards.
- 8.17 In residential developments at least one space, or ten per cent, whichever is the greater, should be provided for Blue / Purple Badge holders. Disabled parking would not be marked out as it will be provided within an automated parking system. Car parking for blue badge users (5 spaces) would be reserved within the automated stacker. The car park access will provide sufficient space around the parking platform pallets to enable a wheelchair user to access.
- 8.18 The Applicant has agreed that future residents will not be eligible obtain on-street residents or business parking permits from the Royal Borough unless they are Blue Badge Holders. The restriction ensures that the current residents of the area will be protected from any potential overspill for parking demand. The development will be secured as car free through the Section 106 (via an undertaking in that Agreement under Section 16 of the Greater London Council (General Power) Act 1974).

Cycle Parking

- 8.19 Cycle parking meets London Plan standards to encourage and enable cycling.

Table 7.2 Cycle Parking Provision

	Adopted London Plan Requirement	Proposed Development Provision
Residential Long Stay	75	75
Residential Short Stay	2	2
Hotel Long Stay	55	55

Hotel Short Stay	22	22
Total	154	154

- 8.20 A total of 130 long stay and 24 short stay cycle parking spaces will be provided to meet the adopted standards. Residential and employee cycle parking will be provided on site accessed via dedicated cycle lifts.
- 8.21 Following discussions with TfL, 20% of residential spaces will be in the form of Sheffield stands and 80% in the form of two-tier stands. For staff spaces, 10% will be in the form of Sheffield stands and 90% in the form of two-tier stands. Showers and changing facilities would be provided within the basement for employees.
- 8.22 Short stay (visitor) cycle parking spaces would be provided within the public realm surrounding the building in the form of Sheffield stands which each provide parking for two bicycles.

Servicing and Refuse Collection

- 8.23 The existing hotel provides two separate service accesses on Ashburn Place that requires vehicles to reverse in from the public highway. Servicing for the existing building also takes place on street. The proposed off-street servicing arrangements have been designed to accommodate the forecast delivery demands and will offer a significant improvement to the existing arrangements.
- 8.24 The proposed servicing arrangement will provide four servicing bays within the ground floor service yard and will accommodate all servicing within the building with vehicles entering and exiting the site in a forward gear. A robust strategy will also be put in place to ensure deliveries are managed properly in accordance with a Delivery and Servicing Plan which is submitted in support of the application.
- 8.25 Refuse collection for the hotel, residential units and ancillary retail elements of the scheme will be undertaken from the servicing yard. Waste storage is provided in the basement in the form of Eurobins. These would be transferred from the basement to the ground level servicing yard for collection. A Waste Management Strategy is submitted as part of the planning application.

Travel Demand

- 8.26 The proposed hotel is expected to be an upper 4 star / 5 star offering, superior to the existing hotel. The proposed hotel would therefore attract different types of hotel guests and have a different travel demand to the existing hotel. For instance more business guests may be expected and various airlines have contracts with the existing hotel, and it would be unlikely that these would continue at a more expensive hotel. It is anticipated for example that the current coach trips will reduce and the number of taxis will increase.
- 8.27 The proposed hotel is comparable in size to the existing hotel on the site, as well as the Park Plaza hotel in Westminster, which has been used to forecast the proposed development travel demand. The Transport Assessment concludes that the net change in travel to and from the site during the peak hours is negligible compared to the existing Holiday Inn hotel and can be accommodated safely within the capacity and provisions of the existing transport network. Suitable on site transport provisions are provided to both accommodate and spatially distribute the arrival and departures of trips by all modes. The following management plans are submitted to accompany the planning application:

- Outline Delivery and Servicing Management Plan;
- Outline Coach and Taxi Management Plan;
- Outline Car Parking Management Plan;
- Outline Construction Traffic Management Plan; and
- Outline Framework Travel Plan.

9. Environmental Considerations

9.1 The following section covers the key environmental impacts of the Development. The impacts are measured against relevant adopted and emerging policy.

Energy and Sustainability

9.2 Paragraphs 93 to 97 of the NPPF underpin the Government's priority in delivering sustainable development. In line with the NPPF, development proposals are expected to comply with the local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy.

9.3 In line with London Plan Policy 5.2, the 35% carbon reduction target beyond Part L of the Building Regulations applies.

9.4 Policy CE1 of the Consolidated Local Plan requires development to make a significant contribution to make a significant contribution towards reducing the government's target of reducing national carbon dioxide emissions by 26% against 1990 levels by 2020.

9.5 The proposed development is targeting the achievement of BREEAM 'Excellent'. Sustainability measures will also include reductions in water use, waste and pollution as well as improvements in occupant health & wellbeing and the ecology of the site.

Daylight and Sunlight

9.6 Daylight, sunlight and overshadowing assessments of the Development have been carried out in accordance with the BRE Guidelines by Point 2 Surveyors and their findings are set out in detail within the Chapter 10 of the Environmental Statement and related appendices.

9.7 Policy 7.6 of the London Plan requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for tall and residential buildings.

9.8 Policy 7.7 further states that tall buildings should not adversely affect their surroundings in terms of overshadowing and reflected glare.

9.9 Draft London Plan Policy D8 reiterates the importance of ensuring that tall buildings do not compromise the comfort and enjoyment of neighbouring residential properties and open spaces to new development.

9.10 Policy CL5(b) of the Consolidated Local Plan seeks to ensure 'that good standards of daylight and sunlight are achieved in new development and in existing properties affected by new development; and where they are already substandard, that there should be no material worsening of the conditions'.

9.11 A detailed assessment concludes that the effect of the Proposed Development in daylight, sunlight and shadow terms would be no greater than minor adverse in significance and is considered acceptable in planning terms.

Noise

- 9.12 The NPPF seeks to prevent new development contributing towards unacceptable noise pollution (Para 109).
- 9.13 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise. The Draft London Plan reiterates that developments should consider how to moderate their noise impacts during construction and use once operational (Draft Policy D12 and Draft Policy D13).
- 9.14 Policy CE6 of the Consolidated Local Plan sets out how *'the Council will carefully control the impact of noise and vibration generating sources which affect amenity both during the construction and operational phases of development. The Council will require new noise and vibration sensitive developments to mitigation and protect occupiers existing sources of noise and vibration'*.
- 9.15 An assessment of the noise and vibration effects of the proposed development is provided within the Environmental Statement (Chapter 8). It is based on a number of site noise and vibration surveys, including an assessment to determine suitability for residential uses.
- 9.16 The assessment results indicated that, with the introduction of standard mitigate measures (The building services plant will be designed to the limits listed) the Proposed Development will not result in residual effects of either Moderate or Major Significance. Therefore, there are no likely significant effects relating to noise and vibration expected as a result of the Proposed Development.
- 9.17 In addition, the assessment considers the implication of the construction of the Development and concludes that a CMS to include best practice measures to reduce noise effects. Section 61 agreement, including monitoring of construction noise to ensure that appropriate controls on the noise emissions are made.
- 9.18 Overall, the effects of the proposed development will be acceptable in terms of noise and vibration and therefore the Development complies with the relevant planning policy.

Air Quality

- 9.19 The NPPF seeks to prevent new and existing development being adversely affect by unacceptable levels of air pollution (Para 109).
- 9.20 The London Plan and the Mayor's Air Quality Strategy (2010) seek to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal, effects on human health are likely to occur. Policy 7.14 of the London Plan promotes an 'air quality neutral' approach, where developments will not contribute to further deterioration of air quality.
- 9.21 An Air Quality Neutral Assessment has been undertaken using the GLA's SPG for Sustainable Design and construction and following guidance within the Air Quality Neutral Planning Support Update.
- 9.22 Policy CE5 of the Consolidated Local Plan and Draft Policy CE5 of the Local Plan Partial Review states that the Council will carefully control the impact of development on air quality, including the consideration of pollution from vehicles, construction, and the heating and cooling of buildings. All major developments are required to be air quality neutral and be supported by an air quality assessment.

- 9.23 The Air Neutral Assessment confirms that the Development is better than air quality neutral for in terms of building emissions and transport emissions.
- 9.24 The impact of the Proposed Development in respect of Air Quality is discussed within Chapter 9 of the Environmental Statement. The assessment of Air Quality concludes that the emissions from the proposed centralised energy plant within the Proposed Development and additional development-generated traffic will have an insignificant impact on air quality at existing nearby properties and, will not lead to any objective exceedances within the Proposed Development itself.

Wind and Microclimate

- 9.25 The adopted NPPF makes no explicit reference to daylight and sunlight. However, the draft NPPF notes that during the determination of applications that local planning authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site, so long as the resulting scheme would provide acceptable living standards.
- 9.26 The London Plan (2015) places a strong importance on the creation and maintenance of a high quality environment for London. In particular, Policy 7.6B of the plan emphasises that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, should provide high quality indoor and outdoor spaces and should be adaptable to different activities and land uses.
- 9.27 Policy 7.7 outlines a number of principles for the Location and Design of Tall and Large Buildings. It states that application for tall or large buildings should not have an unacceptable harmful impact on their surroundings and should not affect their surroundings adversely in terms of microclimate, wind and turbulence.
- 9.28 The Sustainable Design and Construction SPG (2014) states in section 2.3.7 that 'large buildings have the ability to alter their local environment and affect the micro-climate'. It further states that large buildings can influence the way that wind travels across a site, potentially making it unpleasant at ground level or limiting the potential to naturally ventilate buildings. The SPG indicates that on sites that are significantly taller than the surrounding environment, the developer should carry out an assessment of its potential impact on the ground conditions, and ensure the resulting design of the development provides suitable conditions for the intended uses.
- 9.29 Policy CL5 requires that new development provides reasonable enjoyment of the building, gardens and other spaces as a result of, inter alia, microclimate impacts.
- 9.30 Chapter 11 of the Environmental Statement sets out the potential effects on the wind microclimate of the completed Development with existing and cumulative surroundings. The assessment concludes that following the impact of the Proposed Development is minor beneficial to negligible in all instances except for the balconies where mitigation is required to eliminate any safety exceedances.
- 9.31 Furthermore, no significant effects on wind microclimate have been identified during construction.

Biodiversity and Ecology

- 9.32 A Phase 1 Habitat Survey was undertaken at the site on 4 August 2017 to support the preparation of a Preliminary Ecological Appraisal (PEA). It covered the entire site including boundary features.

- 9.33 The site survey identified that the site contained a high-rise hotel building with associated hard and soft landscaping. The main habitats present included amenity grassland, species-poor non-native hedgerows, introduced shrub and scattered trees/treelines.
- 9.34 A series of enhancement measures have been recommended within the PEA that if implemented, would enhance the site's ecological value.
- 9.35 Based on the results of the Phase 1 Habitat Survey, Bat Presence/Likely Absence Survey, and Desk Study, it is considered that the Proposed Development does not have the potential to generate any significant ecological effects. As such, it was agreed to scope Ecology out of the Environmental Statement.
- 9.36 Measures proposed as part of the Proposed Development which provided ecological enhancements are described in the Environmental Statement, alongside their associated biodiversity benefits.

Archaeology

- 9.37 MOLA have been instructed to carry out a Historic Environment Assessment (HEA) of the Proposed Development. The HEA is a desk-based study which assesses the impact on buried heritage assets (archaeological remains).
- 9.38 Buried heritage assets that may be affected by the Proposed Development comprise foundations of late Victorian terraced buildings. The strip of land along the northern border of the site held a terrace of Victorian buildings. These were demolished when the hotel was built in the 1970s, but the strip of land was not developed. There is high potential for these footings to remain below ground, and would be impacted by the Proposed Development. However, any such remains would be of low heritage significance.
- 9.39 In respect of the two further basement levels within the Proposed Development, it has been concluded by MOLA that it is unlikely to have no additional impact on buried heritage assets. However, excavation for and construction of a double level basement in the strip to the north would remove all archaeological remains within its footprint. Piled foundations, if used, would only have an impact in the strip to the north.
- 9.40 In light of the very low survival potential across site, a preliminary archaeological field evaluation is not required. Instead, the HEA recommends that an archaeological watching brief is carried out during preliminary ground preparation in areas that have not been impacted by the existing building, to ensure that any previously unrecorded archaeological assets were not removed without record. This should be secured through an appropriately worded planning condition.

Land Contamination

- 9.41 A Preliminary Risk Assessment (PRA) for the site has been undertaken in relation to potential land contamination.
- 9.42 The PRA recommends the following:
- Undertake an unexploded ordnance (UXO) preliminary risk assessment if intrusive works are planned on-site: A legacy of sustained bombing during the Second World War is the incidence of UXO encountered throughout Britain to this day, particularly during construction and redevelopment works;

- Selection of appropriate piling techniques and preparation of a piling method statement, so as not to result in any unacceptable risk to groundwater (should proposed piling depth result in penetration of the London Clay layer); and
- No specific linkages of concern have been identified, however, a watching brief, during the demolition and construction period, is recommended where materials is removed in the vicinity of the 'septic tank/foul drainage sump' on-site. Should any unusual ground conditions be encountered, these should be assessed, reported to the Local Authority and appropriate remedial measures identified and verified.

9.43 It is envisaged that these actions will be secured by appropriately worded standard planning conditions.

9.44 It is concluded that the proposed mitigation measures that the construction and operation phases of the Proposed Development is unlikely to give rise to significant adverse environmental effects in relation to ground conditions.

10. Planning Obligations

- 10.1 In respect of the negotiation of planning obligations associated with development, Regulation 122 (2) of the Community Infrastructure Levy Regulations states that: *A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –*
- a) *Necessary to make the development acceptable in planning terms;*
 - b) *Directly related to the development; and*
 - c) *Fairly and reasonably related in scale and kind to the development.*
- 10.2 Paragraph 204 of the NPPF states that planning obligations should only be sought where they meet all of the tests outlined in Regulation 122 of the Community Infrastructure Regulations, as set out above.
- 10.3 It is anticipated that an final package of Section 106 contributions will continue to be discussed with officers following submission of the planning application.

Draft Section 106 Heads of Terms

- 10.4 The draft Heads of Terms included below are proposed to be made in accordance with completed S.106 Obligations Calculator unless otherwise agreed:
- Provisions associated with affordable housing restrictions
 - Financial contributions to Education
 - Financial contributions to Health
 - Financial contributions to Library Facilities
 - Financial contributions to Sport and Leisure Facilities
 - Financial contributions to Community Facilities Revenue
 - Financial contributions to Play Space (to be agreed)
 - Financial contributions to Training
 - Financial contributions to Public Realm (to be agreed)
 - Obligation to restrict parking permits for new residents

Community Infrastructure Levy

- 10.5 The Proposed Development is liable to Mayoral CIL, Crossrail SPG Funding Contributions and RBKC CIL.
- 10.6 Mayoral CIL has been calculated to be £1,382,526 (inclusive of social housing relief and exclusive of indexation). The Proposed Development is not liable to Crossrail Funding SPG Contributions.
- 10.7 RBKC charge for hotel and residential floorspace. The total liability for RBKC CIL has been calculated as £4,610,500 (inclusive of social housing relief and exclusive of indexation).

10.8 Therefore, the overall CIL liability for the Proposed Development is £5,993,026 (inclusive of social housing relief and exclusive of indexation).

11. Conclusion

- 11.1 This Planning Statement has been prepared by GVA, on behalf of Queensgate Bow UK Holdco Limited, in support of a major planning application for the redevelopment of the Site to create a new garden square and new building comprising 749 hotel bedrooms, 340 serviced apartments, 46 residential apartments, of which 20 would be affordable apartments. The hotel and serviced apartments will be supported by ancillary functions, including restaurants, bars, conferencing and dining areas and leisure facilities that will be accessible to guests, visitors and the local community.
- 11.2 This Statement has demonstrated that the proposed development complies with the overall objectives of national, regional and local policy guidance, and in so doing, delivers a sustainable development of the Site that will contribute significantly to the supply of visitor accommodation and homes in the Royal Borough.
- 11.3 In summary, the Proposed Development provides a significant opportunity to positively transform the Site and create a new place that will provide long-term social and economic benefits to the borough and the local community, as set out in Section 2.
- 11.4 The associated public realm proposals for the garden square and wider landscaping improvements will provide a significant enhancement to the public realm adjacent to the Site and its sense of arrival from Gloucester Road tube station.
- 11.5 The quality of the hotel will be significantly enhanced and is designed to accommodate an upper 4 / 5 star luxury hotel operator. The new accommodation will offer a much greater range of room sizes and types to cater for customer choice and budget which will attract new clientele and create wider economic benefits.
- 11.6 Additional benefits include the provision of up to 817 full-time jobs, doubling and potentially tripling the number of hotel related jobs on the site compared to the existing 200 jobs. The redevelopment is also generating 600 construction jobs.
- 11.7 The provision of CIL receipts and S.106 contributions, which will address the impacts that arise directly as a result of the development, will enhance the provision of social, physical or community infrastructure, benefiting RBKC.
- 11.8 The proposed building is of exemplary architectural quality and has been designed to minimise environmental impacts with regards to wind, daylight and sunlight and townscape, as well as protecting the existing residential amenity enjoyed by neighbouring occupiers.
- 11.9 Throughout the design evolution of the Proposed Development, the proposals have been informed by consultation with RBKC officers, the GLA, additional statutory consultees and local residents.
- 11.10 It is therefore considered that the overall planning merits of the proposal as set out in this Statement demonstrates that the Council should favourably consider this planning application for approval.