

Planning Statement

Hotel Refurbishment

The County Hotel, Upper Woburn Place

July 2023

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1. Introduction

- 1.1. This Planning Statement is prepared on behalf of Splendid (Euston) Limited for “*The replacement of windows across all elevations, and replacement roof plant and associated works*” at the County Hotel, Upper Woburn Place, WC1H 0JW.
- 1.2. The works for which planning permission is sought form part of a comprehensive refurbishment and restoration of the hotel also comprising internal reorganisation, and upgrading of all services and the building envelope (for which planning permission is not required).

Site and Surroundings

- 1.3. The site is occupied by an 8 storey Georgian-style building, first erected in the 1940s, which has operated as a hotel with 176 guestrooms. Both the existing building and hotel accommodation are now very dated and have fallen into a state of disrepair. The building no longer meets relevant standards or regulations to operate as a hotel, let alone consumer expectations, and has therefore been vacant since January 2023.
- 1.4. The site is within the West End district of Bloomsbury and is centrally located in relation to the key transport hubs of Euston Station, King’s Cross Station and St Pancras Station. The site therefore has excellent transport links, with a PTAL of 6b, the highest category.
- 1.5. The surrounding area ranges between three to eight storeys, encompassing a mix of uses including commercial, hotel, retail, restaurants and bars, and residential use.
- 1.6. In terms of the Camden and GLA Policies Map, the following are relevant for the site:
 - Within the Bloomsbury Conservation Area
 - Within the Central London Area
 - Within the Central Activities Zone
 - The site is along the Metropolitan Walk
 - Within an Area Quality Focus Area
 - On the edge of the Local Plan Growth Area
 - On the edge of Euston Opportunity Area

Planning History

1.7. The site's Planning History is listed below.

Table 1: Relevant Planning History

Reference	Description of Development	Date Registered	Decision
AC49	The words "COUNTY HOTEL" in out out letters illuminated with neon tube showing green, upon the flank wall giving on to Woburn Walk, of the County Hotel, Upper Woburn Place.	14/09/1949	Approved
AC186	An internally illuminated box sign crosted over basement area, with white lettering and red outlines to the dimensions shown upon drawing submitted	08/01/1951	Approved
CA1404/A	At County Hotel, Upper Woburn Place, W.C.1. A non-illuminated single sided directional sign having black letters to read "JOHN THOMPSON LTD" with black arrow on a stainless steel ground, fronting Woburn Walk. Overall length 1'6" (0.48m), depth 9" (0.25m), overall height 8'3" (2.51m).	29/01/1970	Approved
AD858	The retention in Woburn Walk of two non-illuminated single-sided directional signs measuring 1'6" (0.48m) x 9" (0.25m) in stainless steel with black and blue lettering with their lower edges 7'6" above ground level.	11/04/1978	Approved
2014/4201/P	Installation of new shopfront to the rear section of the building to Woburn Walk elevation with associated entrance, external decking, access stair and railings for use by the ancillary restaurant following the conversion of the existing conference room in association with the existing hotel use and the display of 3 x non-illuminated advertisement to the front and side elevations.	08/07/2014	Approved
2014/4202/A	Advertisement consent to display 3 x non - illuminated signs (Revised).	08/07/2014	Approved
2015/1322/P	Details of acoustic screens, balustrade, gate and fence details required by condition 4 of planning permission 2014/4201/P dated 1st December	24/03/2015	Approved

	2014 for: (Installation of new shopfront to the rear section of the building to Woburn Walk elevation with associated entrance, external decking, access stair and railings for use by the ancillary restaurant following the conversion of the existing conference room in association with the existing hotel use and the display of 3 x non-illuminated advertisement to the front and side elevations)		
2022/0845/P	External alterations including the installation of rooftop plant; the erection of the new rear two storey basement and ground floor extension to accommodate a store and substation within the existing service yard following the removal of the existing basement store; alterations to the existing boundary wall treatment with new entrance at Woburn Walk and infilling of the goods lift.	11/04/2022	Withdrawn

Surrounding Planning Applications

- 1.8. An application was approved at Endsleigh Court (2017/4663/P) for a very similar application involving the *“replacement of all windows across all elevations to existing block of flats (Class C3)”*. This site is within the Bloomsbury Conservation Area and is noted positive contributor and element of streetscape interest within the CA Appraisal.
- 1.9. The Decision Notices states that the *“proposed windows sit in the existing openings and match the existing form of casement openings and general fenestration. As such the replacement is not considered to be detrimental to the character of the building or that of the wider conservation area. Given that no new window openings and sitings are proposed, there will be no impact on neighbour amenity arising from this development”*. This therefore recognises that like-for-like window replacement can be beneficial for an existing building whilst being sensitive to the surrounding context.
- 1.10. In addition, an application was approved at 41 Bedford Square and 11 Bedford Avenue (ref: 2019/3676/P), which is also within the Bloomsbury Conservation Area, for the *“Partial demolition of existing link structure between 11 Bedford Avenue and 41 Bedford Square, installation of new canopy and balustrades, new walk-on rooflight to rear terrace at ground floor level, new plant to front vaults and rear lower ground floor level, removal of internal partitions and ceiling at 11 Bedford Avenue, partitions removal at basement level at 41 Bedford Square, and other internal alteration”*. In relation to the improvements to the front façade, the Delegated Report noted that similar works have been undertaken

in the vicinity and therefore the proposed work would be of heritage benefit, helping to maintain the condition of the façade materials.

2. Decision Making Framework

- 2.1. Planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise¹.

Development Plan

- 2.2. The Development Plan is comprised of:

- The London Plan (March 2021)
- The Camden Local Plan (July 2017)

Material Considerations

- 2.3. A revised NPPF was published (July 2021) and is an important material consideration in decision making, particularly with regard to land use optimisation.

- 2.4. The Greater London Authority (GLA) and LB Hackney have several additional documents which are material considerations relevant to this application:

- Camden Air Quality SPD (January 2021)
- Camden Amenity SPD (January 2021)
- Camden Design SPD (January 2021)
- Camden Energy Efficiency and Adaptation SPD (January 2021)
- GLA CAZ SPG (March 2016)
- GLA Character and Context SPG (June 2014)
- GLA Energy Planning Guidance (June 2022)

Heritage Framework

- 2.5. As the site is within the Bloomsbury CA, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies to the proposal, which states, "*In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2),² special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*".

- 2.6. The site is within the setting of the following Listed Buildings:

- Church of St Pancras (Grade I-Listed)

¹ S38(6) Planning and Compulsory Purchase Act 2004

² These include the planning Acts.

- 4-18 and 4A-18A, Woburn Walk (Grade II*-Listed)
- 1-9 and 9A, Woburn Walk (Grade II*-Listed)
- Hilton Hotel London Euston and Attached Railings (Grade II-Listed)
- British Medical Association House Including Screen And Gates (Grade II-Listed)
- Drinking Fountain in Churchyard of St Pancras Church (Grade II-Listed)
- Two Lamp Posts (Grade II-Listed)

2.7. Therefore Section 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also applies to this proposal, which states “*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”.

2.8. The following case law is particularly instructive where planning decisions are to be made in the context of heritage assets. First, the *Forge Field* Judgment³ explains the proper application of the above statutory tests, and their interplay with the Section 38(6) statutory test.

2.9. The more recent *Bramshill* Judgement⁴ affirms that the approach in *Bohm*, amongst others, is a legitimate methodology for applying the relevant statutory tests for heritage, as well as the heritage test in the NPPF. It confirms further that other methods of applying Section 72 would not result in different conclusions, provided the other methods are also valid.

³ R (on the application of) Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC 1895 (Admin)

⁴ City & Country Bramshill Limited v Secretary of State for Housing, Communities and Local Government and others [2019] EWHC 3437 (Admin)

3. The Proposal

Existing Building

- 3.1. The site's lawful use is C1 (Hotel), and it has been vacant since January 2023.
- 3.2. The existing building has become very dated and fallen into a state of disrepair. As existing, it does not meet consumer expectations, and also falls short in terms of its environmental and acoustic properties. Consequently the Applicant is committing significant investment to bring the building up to a modern standard, to allow the hotel use to continue to be viable.

Proposed Works

- 3.3. The proposal includes a package of works that will comprehensively refurbish the dilapidated building. The Applicant wishes to significantly reduce its carbon footprint through a range of retro-fitted measures, and the proposal would comprehensively upgrade the building's envelope and services.
- 3.4. While the scope of wall, roof, and internal upgrades does not require planning permission, they are discussed herewith to demonstrate the commitment to the overall building improvement strategy.

New Windows

- 3.5. The existing windows are tired and dilapidated, and have suffered a lack of maintenance over a number of decades. The window sills are at a height lower than what is acceptable for Building Control today, and the windows do not meet operator and consumer requirements in terms of acoustic or environmental performance, and therefore as existing, the site can no longer viably operate as a hotel. The lack of maintenance has meant the windows are beyond repair. An image of the existing windows can be seen on page 5 of the Design and Access Statement.
- 3.6. The existing single-glazed timber windows are proposed to be replaced with slim profile double-glazed timber windows in a like-for like style that replicates the existing pattern of glazing bars across the sashes and casements. The replacement windows would be working Heritage Slim Sash and Heritage Slim Casement systems, replicating the existing window types, complete with brass ironmongery. All windows are proposed for replacement to retain uniformity across the fenestration.
- 3.7. The proposed windows would be sensitive to the existing building and surrounding context, enhancing the buildings appearance whilst being of robust materials to ensure longevity and minimising future work to the building. The windows would also maximise the environmental, acoustic and economic performance of the building.
- 3.8. The replacement strategy facilitates compliance with the necessary regulations and operator standards, thus allowing the hotel use to remain on site.

Improved Ventilation Strategy

- 3.9. The existing ventilation strategy would be improved, and the new windows would be manufactured with trickle vents and acoustic attenuators positioned on the uppermost part of the frame. Details of the existing vents is available on page 6 of the Design and Access Statement.
- 3.10. The trickle vents are required to deliver an upgraded ventilation strategy and would mitigate the noise impacts from the site's location on Upper Woburn Place with its high levels of traffic. These would improve the acoustic performance of the site, allowing for an industry-standard guest experience in terms of noise and room temperature. Details of the proposed ventilation strategy is available on pages 8-9 of the Design and Access Statement.

Rationalisation of Roofscape

- 3.11. The existing roof plant, balustrade and rooflights would be removed and modern plant (all set in from the roof edge to avoid visibility from the surrounding public realm), and a low-lying fall-arrest system installed.

Wider Refurbishment

- 3.12. As previously discussed, the following works do not require planning permission but are included within the scope of this application to evidence the Applicant's commitment to holistically refurbishing and upgrading the existing building.
- 3.13. The external walls would be refurbished, and the façade would benefit from:
- General repair and cleaning of masonry
 - Rainwater goods repair and replacement, including cleaning out of gutters and downpipes.
 - Removal of redundant ductwork and flues as required
 - Repairs to walls where fixings have been removed
 - Removal of broken windows and doors to the Plant Room enclosure, together with repairs and re-rendering
- 3.14. The existing roof would also be restored, including:
- Removal of faulty roof coverings and replacement with a high-performance roof system.
 - Removal of fragile rooflights.
 - Removal of redundant access stairs and platforms.
- 3.15. In addition the proposal would include comprehensive renovation to the internals, providing enhanced guest facilities and contemporary en-suite guestrooms, providing a higher standard of hotel accommodation.

3.16. The proposed works would improve the building's economic, environmental and acoustic performance whilst also ensuring the continued viable use of the existing building. The proposed works would secure the hotel's future as a vibrant and sustainable destination for a variety of guests, including both business and leisure tourists.

4. Deliverable Benefits

Optimising and Retrofitting an Existing Building

- 4.1. The proposal would ensure the retrofit⁵ and repair of an existing building that is situated within one of the most sustainable locations in the Borough. The proposal would optimise the site's capacity, prioritising a sustainable form of development and maximising the longevity of an existing building, preventing any further disruptive work in the future.
- 4.2. The NPPF and London Plan place great emphasis on the importance of "making the best use of land" and "directing growth towards the most accessible and well-connected places".
- 4.3. Local Plan Policy G1 notes that Camden is a sustainable place for growth, however notes that Camden has a limited availability of land, and in order to accommodate growth "*there is a need to use Camden's land more efficiently*".
- 4.4. Local Plan Policy CC1 also highlights this, noting that the "*Council will seek to make the most efficient use of Camden's limited land and steer growth and uses that will generate a large number of journeys to the most accessible parts of the borough*"⁶.
- 4.5. This is further recognised in London Plan Policy GG2, and in order "*to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must... prioritise sites which are well-connected by existing or planned public transport... understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character*". Given the site's very sustainable location and PTAL 6b, ensuring efficient use of the site is essential.
- 4.6. London Plan Policy D3 outlines a design-led approach to optimising site capacity, noting that this should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth. Given the site's very sustainable location and large existing building, optimising the site's use should be imperative. In addition, Policy D3⁷ outlines a hierarchy for building approaches, noting that refurbishment, refit and refurbish are of the greatest gains, and key to optimising land use.
- 4.7. Local Plan Policy CC2 echoes this, placing great importance on the retention and retrofit of existing buildings, noting that the Council will require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building, and expect all

⁵ The London Plan defines retrofit as "*the addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts*".

⁶ London Plan Policy CC1, Paragraph 8.14

⁷ London Plan, Figure 2.3.2

developments to optimise resource efficiency. The supporting text further emphasises this, stating that *“possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed”*⁸.

- 4.8. Policy SI7 of the London Plan raises the importance of resource conservation, waste reduction, increases in material-use recycling, and reductions in waste going for disposal. The Policy aims to promote a more circular economy, that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. In addition, the Policy encourages waste minimisation and prevention through the reuse of materials.
- 4.9. The benefits of retrofitting an existing building are further noted by the Green Construction Board, stating that *“retaining the resource value embedded in structures is one of the most significant actions you can take to reduce waste and material consumption”*, and therefore would optimise resource efficiency.
- 4.10. Therefore, the strategy to re-use and retrofit an existing building in a very sustainable location is wholly supported by Policy, promoting a low carbon and sustainable form of development.

Improved Environmental and Acoustic Performance

- 4.11. As set out above, the proposal provides an excellent opportunity to refurbish an existing building. In retaining the existing building, there are significant embodied carbon savings compared to if the building was completely demolished and a new replacement building was built.
- 4.12. In addition to this, the replacement of windows would substantially improve the thermal efficiency and acoustic performance of the building. This would maximise the site’s energy efficiency within its operational phase, further reducing carbon emissions and allowing the site to meet the relevant standards to be occupied by a hotel operator.
- 4.13. An Energy Statement has been prepared by Elkoms Consulting to support the application. This confirms that compared to retention and refurbishment of the existing windows, or the replacement of the windows along with fully mechanical ventilation, the proposed approach to maintain natural ventilation via an improve façade presents the most carbon-efficient option, and there is a minimum reduction in energy consumption at 86.5%.
- 4.14. The benefits of replacing windows is noted within the Energy Efficiency and Adaptation CPG, noting that windows can *“let a lot of heat out when temperatures are colder outside than inside”*, stating that with the replacement of windows, *“thermally efficient glazed windows will provide more effective insulation than older windows”*.

⁸ Local Plan Policy CC1, Paragraph 8.16

- 4.15. Local Plan Policy CC1 outlines the Council’s approach to climate change mitigation, promoting zero carbon development and requiring all development to reduce carbon dioxide emissions. In addition, Policy CC1 encourages sensitive energy efficiency improvements to existing buildings. The supporting text further emphasises this, noting that new developments in Camden will be expected to be designed to minimise energy use and CO2 emissions in operation⁹.
- 4.16. Policy SI 2 of the London Plan highlights the commitment to London becoming a zero-carbon, requiring reduction in greenhouse gases, namely carbon dioxide.
- 4.17. Policy SI 1 of the London Plan stresses the importance of reducing greenhouse gas emissions during the buildings operations. Figure 9.2 outlines an energy hierarchy which should inform the design, construction and operation of new buildings, with the priority being to minimise energy demand. Furthermore, the Policy outlines that all developments should use innovative building materials and smart technologies to further reduce carbon emissions
- 4.18. The Governments Net Zero Strategy outlines that “*devolved and local government play an essential role in meeting national net zero ambitions*” noting that a place-based approach to net zero is vital. Therefore, the proposal would support a more sustainable future for development in Camden and London, supporting the UKs target to be net zero by 2050.
- 4.19. Therefore, as supported by the above policies, the proposal would ensure a more thermally efficient building, reducing annual and peak energy demand of the site. The building’s operational carbon emissions would therefore be minimised, forming a declining proportion of the site’s whole life-cycle carbon emissions.
- 4.20. An Acoustic Note has been prepared by Acoustic Ltd which confirms that the compared to the existing ventilation approach, acoustic trickle ventilators will significantly improve the noise climate within the sensitive rooms, bringing them in line with modern market and guest standards.

Economic Benefits of Hotel

- 4.21. At present, the hotel does not meet relevant standards to operate as a hotel and is consequently vacant, providing zero economic benefit to Camden. The proposed works would ensure that a hotel operator can occupy the site, meeting standards, ensuring that the site is bought back into economic use as a hotel.
- 4.22. Hotels are of fundamental importance to a location’s economy. As well as creating direct, indirect and induced employment and economic activity, they enhance the viability of local business and leisure economics.

⁹ Local Plan Policy CC2, Paragraph 8.6

- 4.23. *“The total gross value added contribution to GDP from the hospitality industry is estimated to have been £143 billion in 2014. This is equivalent to 10% of UK GDP”¹⁰.*
- 4.24. By another measure *“the hospitality industry is estimated to have supported a total of 4.6 million jobs in 2014 either through its own activities, its supply chain or the induced expenditure of its employees and those in its supply chain. This equates to 14% of the total employment in the UK”¹¹.*
- 4.25. Businesses, whether domestic or international operations will often have requirements for visitors to remain within their vicinity for more than a day, in which case, visitor accommodation will need to be provided. An absence (or lack of cost effective options) of this type of accommodation can have serious implications for a business’s ability to functional properly and grow, and can create a lack of desire to locate in that particular destination.
- 4.26. The viability of leisure destinations is reliant on the existence of visitor accommodation in all its guises. Leisure attractions are heavily reliant on visitor patronage. Many of these visitors will be international or reside domestically, but sufficiently far away to require short term sleeping accommodation. Again, without an adequate available and cost effective supply of visitor accommodation, a location’s leisure economy can suffer and become eroded.
- 4.27. Indeed, this general presumption is recognised by Policy E3 of the Local Plan, which *“recognises the contribution that tourism makes to the character of Camden and the way that is perceived by those living outside the borough, and also the substantial number of jobs it provides”*.
- 4.28. This is further noted by Policy E10 of the London Plan that states *“London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure”*.

The Issues Facing London and Camden

- 4.29. London has one of the world’s most important business economies, and is the second most visited city globally for international tourism. International and domestic tourists created 31.5 million overnight visitors within the capital in 2015¹²
- 4.30. *“Given the importance of tourism to London’s economy, London needs to ensure that it is able to meet the demands of tourists that want to visit the Capital, and a most important aspect of that is to provide suitable accommodation for those that wish to visit. However, currently the supply of serviced rooms is tight and the cost of accommodation expensive. In 2015 London had the highest occupancy rate of all*

¹⁰ Page 22, Economic contribution of the UK hospitality industry (September 2015), Oxford Economics (on behalf of the British Hospitality Association).

¹¹ Page 8, Economic contribution of the UK hospitality industry (September 2015), Oxford Economics (on behalf of the British Hospitality Association).

¹² Page 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017

European cities, and the fourth highest average daily rate, behind Zurich, Paris and Geneva”¹³. The average daily rate in 2015 was £194.40¹⁴.

- 4.31. Consequently, the London Plan explains that “*it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum*”¹⁵. In other words, the London Plan seeks more than a 10% uplift in the annual target, compared to its adopted counterpart.
- 4.32. LB Camden contains the second highest number of serviced accommodation rooms amongst London Boroughs – 18,038 or 12.4% of London’s total¹⁶. Based on demand, it is estimated that Camden will need to provide 1,595 additional rooms to meet the growing demand by 2041. This equates to 2.7% of London’s total demand. Accounting for losses across the Borough, the number increases to 2,113¹⁷ serviced accommodation rooms.
- 4.33. It is therefore helpful that Camden’s Local Plan acknowledges the importance of hotels to the Boroughs’ continued role as a business and leisure hub. It explains that “*Camden has a wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town’s markets and Covent Garden; venues such as the Roundhouse, Koko and the Forum; Regent’s Canal; and historic places, such as Hampstead and Bloomsbury. These attract high numbers of visitors throughout the year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole*”. As well as the importance of visitor accommodation to the local economy, the Local Plan states “*Camden’s visitor economy provides around 16,500 jobs in the borough, 10% of all tourism related employment in Inner London (Study of the Visitor Economy in Camden 2009) and is worth £566 million per annum*”.

The Appropriateness of Hotel Use

- 4.34. The site falls within the Central Activities Zone, and is located in proximity to a number of key transport hubs, making the area well connected to central London and beyond. As a consequence of all the above, it is one of the most sustainable locations in London, and ensuring the site is of sufficient standard to continue as hotel use is entirely to reason.
- 4.35. This is noted by Local Plan Policy E3 which states that “*The Council will guide tourism development that is likely to attract large numbers of people to Camden’s part of Central London, particularly the growth*

¹³ 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹⁴ Table 7, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹⁵ Paragraph 6.10.2, London Plan

¹⁶ Table 4, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹⁷ Table 14, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

areas of King's Cross, Euston, Holborn and Tottenham Court Road". The site is located within close proximity of both King's Cross and Euston.

- 4.36. Furthermore, Policy E10 of the London Plan follows similar trends in promoting hotel use, stating that: "*London's visitor economy and associated employment be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure*". The policy also seeks to direct new visitor accommodation to 'appropriate locations' within the Central Activities Zone (CAZ).

5. Heritage and Townscape Considerations

- 5.1. The proposal would deliver a high quality and sensitive design, that pays due regard to the Bloomsbury Conservation Area and surrounding heritage assets. This section should be read in conjunction with the Heritage Statement prepared by JB Heritage which provides a full assessment of the proposal.
- 5.2. The County Hotel is a 20th century structure not subject to any individual heritage designation but is identified as a positive contributor to the Bloomsbury Conservation Area. It is located within a sensitive townscape with adjacent Grade II and Grade II* listed buildings.
- 5.3. The contribution of the building is concentrated in the principal elevation fronting Upper Woburn Place, with potential for enhancement on its side elevations fronting Woburn Walk. Although the building makes a less contribution to the interest of the conservation area relative to its designated neighbours, it is a respectful building that sits comfortable within its 20th century evolved townscape context on Upper Woburn Place.
- 5.4. The proposed external changes are very minor, and would be sensitive to the site's context. The replacement windows have been carefully designed to replicate the appearance of the existing with matching glazing bar patterns across the sash and casement windows. Care has been taken to balance energy efficiency and acoustic upgrades whilst maintaining the overall appearance of the building and its contribution to the character and appearance of the conservation area and setting of adjacent heritage assets.
- 5.5. The Heritage Assessment states that the replacement units would deliver overall enhancement by replacing dilapidated windows with high quality timber replacements designed to replicate the appearance of the existing and support its ongoing use.
- 5.6. The Heritage Assessment concludes that the proposal would not materially adversely impact the contribution that the building makes to the character and appearance of the conservation area or significance of nearby listed buildings. Given the urban character of the townscape in this location alongside the modest nature of the proposals, heritage assets within the wider area are therefore unlikely to be affected by the proposed development.
- 5.7. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) identifies that the character of the Bloomsbury Conservation Area is vulnerable to negative change through the deterioration of built fabric arising from neglect and a lack of maintenance¹⁸. This is highlighted as being particularly acute in areas dominated by hotels, student accommodation and hostels. The aims and

¹⁸ Paragraph 5.9

objectives of this proposal therefore align directly with the positive management of the distinctive character of the conservation area.

- 5.8. Local Plan Policy D2 notes that the *“Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets”*. Given that the proposal would not materially adversely impact the contribution that the building makes to the character and appearance of the conservation area or significance of nearby listed buildings, Policy D2 supports the application proposal.
- 5.9. Moreover, Local Plan Policy D2 recognises the importance of retrofitting existing buildings within Conservation Areas, stating that *“Historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival”*.
- 5.10. This is again noted in the Council’s Supplementary Planning Document ‘Energy efficiency and adaptation’ (2021) which makes clear that the Council supports sensitive development which improves the energy efficiency of existing buildings, with all buildings being refurbished expected to reduce their carbon emissions by making improvements¹⁹.
- 5.11. The proposed refurbishment work would prioritise energy efficient development, maximising the longevity of an existing building (that is currently suffering from a lack of maintenance) whilst ensuring the proposed works are respectful to the surrounding context.
- 5.12. The proposals is therefore considered to be entirely in accordance with Local Plan Policy D2, London Plan Policy HC1, the objectives of Chapter 16 of the NPPF and s.66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

¹⁹ Paragraph 8.3

6. Conclusion

6.1. This Planning Statement has been prepared by Centro Planning Consultancy on behalf of Splendid (Euston) Limited (“the Applicant”), the landowner, in the support of its application for full planning permission at The County Hotel, Upper Woburn Place, WC1H OJW. The proposed development is as follows:

“The replacement of windows across all elevations, and replacement roof plant and associated works”.

6.2. Since its original construction in 1940s, the building has operated as a hotel, however it has lacked any meaningful investment for a long time, has fallen into disrepair, and fails to meet the necessary standards and regulations for a hotel operator to occupy the site, let alone consumer expectations.

6.3. The proposal is to comprehensively refurbish and retrofit the existing building, allowing it to be brought back into economic function. This would include the provision of new high quality and thermally efficient windows, an upgraded ventilation strategy, refurbishment to the existing façade and roof, the installation of new plant, as well as internal upgrades to the hotel accommodation.

6.4. As discussed in section 5, the proposal would be sensitive and respectful to the existing building and context, and the proposed works would not adversely impact the contribution that the building makes to the character and appearance of the conservation area or significance of nearby listed buildings.

6.5. In summary, the benefits of the proposal include:

- The retrofit of an existing building, optimising existing land and resource efficiency (i.e. a low embodied carbon approach);
- Significantly reducing the building’s energy demand and carbon footprint;
- Bringing the hotel operation back up to a consumer-expected standard;
- Enhancement of the existing building, that is sensitive to the Bloomsbury Conservation Area and local heritage assets;
- Increased longevity of the building preventing the need for more intrusive future works;
- Economic benefits of improved hotel use; and
- New jobs created during the construction phased development.

6.6. Overall, the proposal is in full accordance with the development plan, meets the relevant heritage statutory tests, and no material considerations indicate otherwise. Consequently, planning permission should be approved without delay.

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