

# Planning Statement

**Hotel Refurbishment**

**The County Hotel, Upper Woburn Place**

**September 2023**

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# 1. Introduction

- 1.1. This Planning Statement is prepared on behalf of Splendid (Euston) Limited for the *“Installation of new front entrance doors, with DDA access. Removal of the goods lift and enclosure from the front of the building, and replacement with a goods platform lift. Erection of a single storey extension, installation of an electrical substation & enclosure, and erection of a linen store, to the rear of the building. Amendments to the rear terrace and erection of an open-sided canopy”* 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.

## **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 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)	24/03/2015	Approved
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
2023/2778/P	The replacement of windows across all elevations, and replacement roof plant and associated works	07/07/2023	Live

### Live Application

- 1.8. As mentioned above, there is currently a live application for the site (ref: 2023/2778/P), which proposes 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.
- 1.9. This proposal would therefore be part of the wider refurbishment of the existing building, enhancing its appearance and supporting its sustained economic use.

### Surrounding Planning Applications

- 1.10. 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. This section articulates the decision making framework for the proposal.
- 2.2. Planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise<sup>1</sup>.

### Development Plan

- 2.3. The Development Plan is comprised of:

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

### Material Considerations

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

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

- 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

- 2.6. 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),<sup>2</sup> special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*".

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

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<sup>1</sup> S38(6) Planning and Compulsory Purchase Act 2004

<sup>2</sup> These include the planning Acts.

- Church of St Pancras (Grade I-Listed)
- 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)

2.8. 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*”.

2.9. The following case law is particularly instructive where planning decisions are to be made in the context of heritage assets. First, the *Forge Field* Judgment<sup>3</sup> explains the proper application of the above statutory tests, and their interplay with the Section 38(6) statutory test.

2.10. The more recent *Bramshill* Judgement<sup>4</sup> 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.

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

<sup>4</sup> 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 unoccupied since January 2023, shortly before refurbishment works began.
- 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 proposed works form part of the wider refurbishment project and upgrades to the existing County Hotel, necessary to sustain the building in hotel use, as well as optimising the lifespan of an existing building. The following section should be read in conjunction with the Design and Access Statement prepared by Maith Design.
- 3.4. The proposal is to upgrade the existing front entrance doors, and these would be replaced with a like for like style of door. A modest access ramp would be added to the front entrance doors to achieve DDA compliance. The existing threshold difference is minimal such that only a modest structure is required that would result in minimal change and have no material impact on the overall character of the building. This would therefore upgrade the appearance of the main entrance door whilst maintaining its existing character.
- 3.5. The proposal is to remove the unsightly existing service lift and enclosure that faces Upper Woburn Place, and replace this with a sensitively design platform lift. This would have a protective balustrade around the edge of the lift that will not exceed the height of the boundary wall such that it can be neatly accommodated within the existing defined area. It would therefore be much less visible within the street scene and allow full views to the bow window to be reinstated.
- 3.6. The existing sub-station is of little architectural or historic interest, as well as being tired and presenting a poorly maintained boundary treatment to the public realm. It is proposed that this would be demolished and replaced, and the structure would house a replacement substation to upgrade the services to the hotel.
- 3.7. A new linen store enclosure would be erected adjacent to improve the 'back of house' functions and external access to the basement level. The new boundary wall would be white rendered matching the stucco of the neighbouring listed buildings and complimentary to the brick colour of the side elevation of

the hotel, and would not result in the loss of a feature of any value to the conservation area or adjacent listed buildings.

- 3.8. The new sub-station and linen store would allow for an enhanced delivery and servicing strategy. As existing, there is no direct/ vertical access possible to Woburn Walk from the rear basement, which has driven the current location of the linen store and good platform lift.
- 3.9. The new arrangement would allow for linen cages to be transported via the new external goods platform lift, and temporarily stored in the linen holding store. This is preferred as the guest lifts are not used and allows for the cages to be temporarily stored away from the front of the hotel, and out of sight. Similarly, refuse servicing is to be transported via the new external goods platform lift which is more desirable than using the guest lifts. This therefore improves the overall management and efficiency of both the linen and waste, improving the amenity of Upper Woburn Place.
- 3.10. The proposal would include a new glazed link extension to enhance the internal floor plan of the hotel's front-of-house area to the rear of the ground floor, infilling the corner created by the footprint of the existing building. This would be a modest single storey structure in a contemporary style featuring extensive glazing set within black aluminium frames. Its style follows the external forms and character of the ground floor of the existing structure in its scale and elevational treatment so as to share a comfortable relationship with the existing building. The flue in this location would be removed.
- 3.11. In addition, the proposal is to refurbish the rear terrace, and install an open-sided canopy, as well as introducing new steps and entrance into the hotel. This would enhance its quality and overall contribution to the character of the surrounding area.
- 3.12. These works form part of a wider refurbishment programme for the County Hotel which has been suffering from a lack of maintenance and investment. The purpose of these works is to enhance and upgrade the quality of the internal accommodation and guest offer, improve back of house facilities that support the hotel functions, and enhance the external appearance of the building.

# 4. Deliverable Benefits

## Optimising an Existing Building

- 4.1. The proposal would ensure the retrofit 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"*<sup>5</sup>.
- 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 D3<sup>6</sup> 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 developments to optimise resource efficiency. The supporting text further emphasises this, stating that

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<sup>5</sup> London Plan Policy CC1, Paragraph 8.14

<sup>6</sup> London Plan, Figure 2.3.2

*“possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed”<sup>7</sup>.*

- 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.

#### **Delivery and Servicing Benefits**

- 4.11. As discussed in section 3, the overall service access strategy has been fully reviewed, and the proposal would improve the operational requirements for the hotel and simultaneously reduces impact on Upper Woburn Place. The provision of the linen holding store allows temporary storage remote from the main facade and entrance, improving the guest experience and hotel management whilst also enhancing amenity to Upper Woburn Place.
- 4.12. Policy T4 of the Local Plan highlights that the movement of goods and materials by road can have a significant impact on the environment and the health and wellbeing of residents, in terms of noise disturbance and its contribution to road congestion and air pollution. The improved strategy would therefore ensure that this is as efficient as possible and minimise any potential disruption.
- 4.13. Furthermore, Local Plan Policy A1 notes that the impact of development should be appropriately managed to protect the amenity of the local area, which is key to successfully managing Camden’s growth and ensuring its benefits are properly harnessed.
- 4.14. Finally, the improved strategy would ensure that Local Plan Policy E is delivered in a manageable way, supporting sustainable growth in the tourism industry for Camden.

#### **Economic Benefits of Hotel**

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<sup>7</sup> Local Plan Policy CC1, Paragraph 8.16

- 4.15. 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.
- 4.16. *"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".*
- 4.17. 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" .*
- 4.18. 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 function properly and grow, and can create a lack of desire to locate in that particular destination.
- 4.19. 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.
- 4.20. 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"*.
- 4.21. 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

- 4.22. 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 2015<sup>8</sup>
- 4.23. *"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*

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<sup>8</sup> Page 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017

*tight and the cost of accommodation expensive. In 2015 London had the highest occupancy rate of all European cities, and the fourth highest average daily rate, behind Zurich, Paris and Geneva*<sup>9</sup>. The average daily rate in 2015 was £194.40<sup>10</sup>.

- 4.24. 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”*<sup>11</sup>. In other words, the London Plan seeks more than a 10% uplift in the annual target, compared to its adopted counterpart.
- 4.25. LB Camden contains the second highest number of serviced accommodation rooms amongst London Boroughs – 18,038 or 12.4% of London’s total<sup>12</sup>. 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 2,113<sup>13</sup> serviced accommodation rooms.
- 4.26. 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

- 4.27. 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.
- 4.28. 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*

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<sup>9</sup> 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

<sup>10</sup> Table 7, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

<sup>11</sup> Paragraph 6.10.2, London Plan

<sup>12</sup> Table 4, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

<sup>13</sup> 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.

- 4.29. 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 Heritage Statement concludes that the proposed renovation works to the front elevation that faces Upper Woburn Place, as well as the proposed work to the terrace and services on Woburn Walk would deliver an enhancement.
- 5.5. The proposal is therefore considered to be entirely in accordance with Local Plan Policy D2, London Plan Policy HC1 and the objectives of Chapter 16 of the NPPF, and the duties at sections 66 and 72 of the 1990 Act can be satisfactorily discharged.
- 5.6. 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 maintenance . This is highlighted as being particularly acute in areas dominated by hotels, student accommodation and hostels. The aims and objectives of this proposal therefore align directly with the positive management of the distinctive character of the conservation area.
- 5.7. 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.
- 5.8. Policy D2 in relation to conservation areas - requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area – proposal would enhance.



5.9. 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.

## 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:
- 6.2. *“Installation of new front entrance doors, with DDA access. Removal of the goods lift and enclosure from the front of the building, and replacement with a goods platform lift. Erection of a single storey extension, installation of an electrical substation & enclosure, and erection of a linen store, to the rear of the building. Amendments to the rear terrace and erection of an open-sided canopy”.*
- 6.3. Since its original construction in the 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.
- 6.4. As discussed in section 4, 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);
  - Bringing the hotel operation back up to a consumer-expected standard;
  - Improving the ground floor front-of-house experience for both guests and members of the public;
  - Enhancement of the existing building, that is sensitive to the Bloomsbury Conservation Area and local heritage assets;
  - Achieving DDA compliance;
  - Facilitating enhanced servicing arrangements;
  - 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, meet the relevant heritage statutory tests, and no material considerations indicate otherwise. Consequently, planning permission should be approved without delay.

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