

The Heritage Practice

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Alex Kresovic
Senior Planning Officer
Development Management
Regeneration and Planning
London Borough of Camden
5 Pancras Square
N1C 4AG

03 November 2023

Planning portal
Reference: PP-12577065

Dear Alex,

Town and Country Planning Act 1990 (as amended) (Section 73) Application for Variation of Conditions Following Grant of Planning Permission Ref. 2019/2985/P

Imperial Hotel 61-66 Russell Square London WC1B 5BB

We write on behalf of the owners of the above property (hereafter referred to as "the applicant") to submit a Planning permission to the London Borough of Camden.

This application is submitted under S73 of the Town and Country Planning Act 1990 (as amended) and seeks: "Variation of wording of condition No 3 (plan list), to secure design amendments principally relating minor alterations at roof level.

The Site

The application site is the Imperial Hotel (class c1), 61-66 Russell Square London WC1B 5BB located on the east side of Russell Square. The hotel was constructed in 1967.

Planning History Overview

Permission was granted on 28 November 2019 for 'reconstruction of ninth-floor level and erection of tenth-floor extension following demolition of existing tenth-floor level plant room; installation of new shopfronts and pavement treatment at front elevation following demolition of existing front structure; revised treatment and landscaping to internal entrance courtyard and associated alterations to hotel building.'

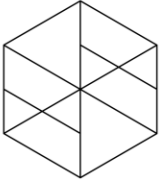
The permission did not include any pre-commencement conditions. The scheme commenced in September 2020. The implementation of the scheme was agreed in writing by Jonathan McClue via email on 22 July 2022.

The approved is an integral part of a comprehensive series of applications that have been submitted to and approved by the Council over the past several years, all aimed at revitalising the hotel.

Constraints

The site is located within the Central Activities Zone (CAZ) and within the designated Holborn growth area.

The building is located within the Bloomsbury Conservation Area. It is described within the Bloomsbury Conservation Area Appraisal and Management Strategy as a building that makes a neutral contribution to the wider conservation area.



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Application overview

This application has been submitted through Planning Portal (ref. PP-12577065) and is made up of this cover letter and:

1. Planning Application Form, including relevant Ownership Certificate;
2. Proposed replacement architectural drawings;
3. Supplementary acoustic reports;

Supporting information:

4. Approved plans; and
5. A copy of the approved and proposed drawings schedule ref: 2023.11.02 Sch Main Planning Amends 1417
6. Updated areas schedule ref: 2023.11.03 Main Application Sch GIFA Areas Rev A 1417

The requisite application fee of £294.00 has been paid via the planning portal.

Application Proposals

The application seeks minor material amendments to the approved scheme.
The proposals include:

Ground Floor

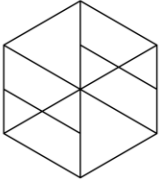
- There are very minor changes which have been undertaken to the ground floor to the shopfronts at the rear of the front building within the courtyard.
- Infilling below the canopy of the main entrance within the courtyard.

First floor

- Minor change to the fenestration above the skybar entrance to better match the existing adjoining façade details.
- Removal of built form which provided 2 x hotel rooms in the inner courtyard between the Imperial Hotel and President hotel (also owned by applicant) to create an external wellness terrace. The wellness garden will provide a small garden facility to the proposed gym.

Second – Eighth Floor

- Replacement of existing flues to the rear north east elevation. These will replace an approved external service lift.
- Minor changes to the central window on the rear façade (north east elevation)



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Ninth floor

- Internally the approved dining, lounge and kitchen facilities will be replaced with bedrooms. This will result in changes to the north west and south east facades (to non-public highway facing facades of the rear block) which more closely match the existing façade appearance.
- The ninth floor parapet to Russell square façade will now be retained as its current height and not lowered as approved.

Tenth Floor

- The main skybar onto the south west elevation (Russell Square) remains as the approved scheme. It matches the overall height, form and configuration.
- Two small glazed staircase enclosures are included due to fire and means of escape requirements.
- The higher section of new glazed façade approved to the rear block will now be omitted from the scheme. This would reduce the overall height of the scheme.
- A new plant facility has been incorporated onto the rooftop. The plant will be lower than the approved envelope but will extend slightly further toward the rear of the building.
- The roof terrace to the rear of the rear block (overlooking Queens Square) is to be omitted and replaced with plant.

The rooftop changes would result in an overall enhancement to the extant scheme by omitting the highest section of the new rooftop extension. This would result in a cleaner and more uniform roofline.

In views from the north side of Russell Square (as seen in the Woburn Place photomontage) the removal of the highest section of the new tenth floor extension would provide a visual break at roof level to avoid coalescence with adjacent buildings compared with the extant permission. The new staircase enclosure to the south side of the rooftop bar would not be seen in views from the square. The proposed northern staircase enclosure would be set within the silhouette of the approved extant rooftop extension and glazed to match the appearance approved glazing. This would reduce its visual affect and ensure it would read as recess in the skyline.

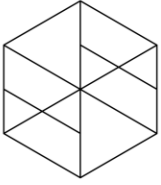
The additional plant at the roof level as been suitably attenuated. The acoustic report concludes that the expected sound levels will fall within the adopted limiting criteria, ensuring minimal disruption to the surrounding area.

Materiality - The materials remain as the original approved consent. This includes the roofing materials, cladding materials, glazing and facade. The new staircase enclosures at roof level would be fully glazed to match the appearance of the tenth floor glazing.

Planning Assessment

S73 of the Act allows for the re-granting of an original planning permission without compliance with conditions originally attached, meaning conditions can be varied or removed entirely. The National Planning Practice Guidance (Paragraph: 017 Reference ID: 17a-017-20140306) states: "There is no statutory definition of a 'minor material amendment' but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved."

The design amendments result in minor changes to the approved layout. All of the proposed amendments relate to recent intervention into the façade when approved in 2019. The majority



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of the proposed design amendments would not have a material effect to the overall design of the development approved by the permission.

Conclusion

We trust that this is acceptable and that the Council can agree that the proposed design amendments can be granted by way of this application made under S73 of the Act. We look forward to receiving confirmation that our application is valid.

The approved and proposed set of drawings would be best explained with a meeting on site. This would enable a simple explanation of the works proposed. We will contact you upon validation of the application to arrange a meeting.

Should you have any queries in the meantime, please contact info@theheritagepractice.com

Yours faithfully,

The Heritage Practice