

Planning Statement

Travelodge Covent Garden

10 Drury Lane, High Holborn, WC2B 5RE

On behalf of:

Travelodge Hotels Ltd and Falkerstone Ltd

February 2024

Our reference: 1271

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1 Introduction

1.1 This Planning Statement has been prepared by Smith Jenkins on behalf of Travelodge Hotels Ltd and Falkerstone Ltd in relation to the proposals at Travelodge Covent Garden, 10 Drury Lane, W2CB 5RE.

1.2 This Statement supports a full planning application to London Borough of Camden for the following development:

“Erection of two storey extension forming new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of undercroft at level 3 and new flat roof link to extend existing hotel bar/restaurant”

1.3 The submitted application is a resubmission of an application that was registered in May 2023 and later withdrawn in July 2023 (ref. 2023/1021/P), to enable design discussions to take place in respect of the new entrance to Drury Lane. The design of this element of the scheme is the only material change in the application.

1.4 This Statement has been prepared to consider the proposed development against the Development Plan and all other material considerations, including the National Planning Policy Framework (NPPF).

1.5 This Statement should be read in conjunction with the submitted drawings and following documents:

- Application drawings, prepared by JWA Architects
- Design and Access Statement, prepared by JWA Architects
- Heritage Statement, prepared by Smith Jenkins
- Crime Impact Statement, prepared by KABSEC
- Transport Statement & Travel Plan, prepared by Paul Mew Associates
- Energy Statement, prepared by Hydrock
- Sustainability Statement (incorporating BREEAM Pre-Assessment Report), prepared by Hydrock
- Fire Strategy Report, prepared by Maze Fire Consulting
- Construction Phase (SHEQ) Management Plan, prepared by Barnes Construction
- Plant Noise Assessment, prepared by Applied Acoustic Design
- Air Quality Assessment, prepared by Aval Consulting Group
- Level 1 FRA and Drainage Strategy, prepared by JPC Environmental Services

1.6 This Statement is set out as follows:

Section 2 – Site Background: provides a description of the site and the surrounding area in addition to setting out relevant planning history.

Section 3 – Proposed Development: provides a detailed description of the proposed development, highlighting the key aspects of the scheme.

Section 4 – Planning Policy: sets out the planning policy framework against which the planning application should be assessed.

Section 5 – Planning Assessment: provides an analysis of the material planning considerations pertinent to the proposed development, provides a detailed justification for the development and outlines the findings of the supporting specialist reports.

Section 6 – Summary and Conclusion: summarises the key features and benefits of the proposed development and the reasons as to why planning permission should be granted.

2 Site Background

- 2.1 This Section provides a description of the site and the surrounding area in addition to setting out the relevant planning history of the site.

Site Context

- 2.2 The application site can be identified from the accompanying Site Location Plan. The site measures approximately 0.24 hectares (ha) in area.
- 2.3 The application site comprises the Travelodge Hotel on Drury Lane, which is also referred to as Travelodge Covent Garden and accommodates 465 guest bedrooms. The site is located in Central London on the south side of the junction of High Holborn and Drury Lane.
- 2.4 The site accommodates a number of buildings of varying building heights and is almost entirely covered by buildings or hard landscaping. The hotel has evolved over time with the linked buildings making up the hotel originally occupied by others, either in hotel use (Drury Lane Moat House Hotel) or office use (St Giles House, the former BT building). The buildings rise up to eleven stories and sit above a car park, plant and back of house services at lower ground level 1 and above lower ground level 2 that accommodates hotel bedrooms and some void areas creating double height space above parking and plant areas.
- 2.5 The surrounding area is heavily urbanised and is very much a mixed use area comprising primarily a mix of retail, office, and hotel uses, with some residential.
- 2.6 To the east of Drury Lane, there are a number of mostly independent retail shops with residential and offices above. These buildings are generally of late 20th Century design and are four to five storeys, although there are some lower buildings. These buildings fall within the Seven Dials Conservation Area that extends eastwards from the centre of Drury Lane. The existing block occupied by Travelodge does not fall within the conservation area. There is also a grade II listed building at 186/187 Drury Lane that dates from the 18th Century.
- 2.7 On the western side of Drury Lane there are three Class E uses that back onto the site, located between the steps that lead to the courtyard level. They are currently occupied by a café, newsagents, and a hair and make-up shop. To the west of the existing block occupied by Travelodge lies Dudley Court, a 'U' shaped building backing onto the private hotel egress. Dudley Court primarily comprises residential flats, an NHS medical centre and contains a garden area in the central courtyard which is designated as Open Space.
- 2.8 To the south lies Shorts Gardens and the side elevation of 17-20 Drury Lane, 60-72 Shorts Gardens and 2-16 Betterton Street. High Holborn is located north of the site. In this location High Holborn is a one way westbound route, whilst Drury Lane is a one-way northbound and Shorts Gardens is one way westbound. The site has a vehicle access/egress arrangement with a private access running through the site between High Holborn and Shorts Gardens. Abutting the hotel to the High Holborn frontage to the west is the fourteen storey LSE student accommodation building.
- 2.9 The primary pedestrian entrance to the hotel is from a raised (ground floor) entrance courtyard located off Drury Lane that is served by two flights of steps. Another entrance via an accessible ramp is located to the rear of the site from Shorts Gardens and this provides access for disabled customers. Level 3 is the ground floor to the hotel that accommodates its entrance, reception, bar/restaurant facilities and

hotel bedrooms. Level 3 sits at the same level as High Holborn but at a higher level to Drury Lane and Shorts Gardens. This requires the stepped and ramped access to the hotel reception as described.

2.10 The application site location plan is shown in Figure 1 below.

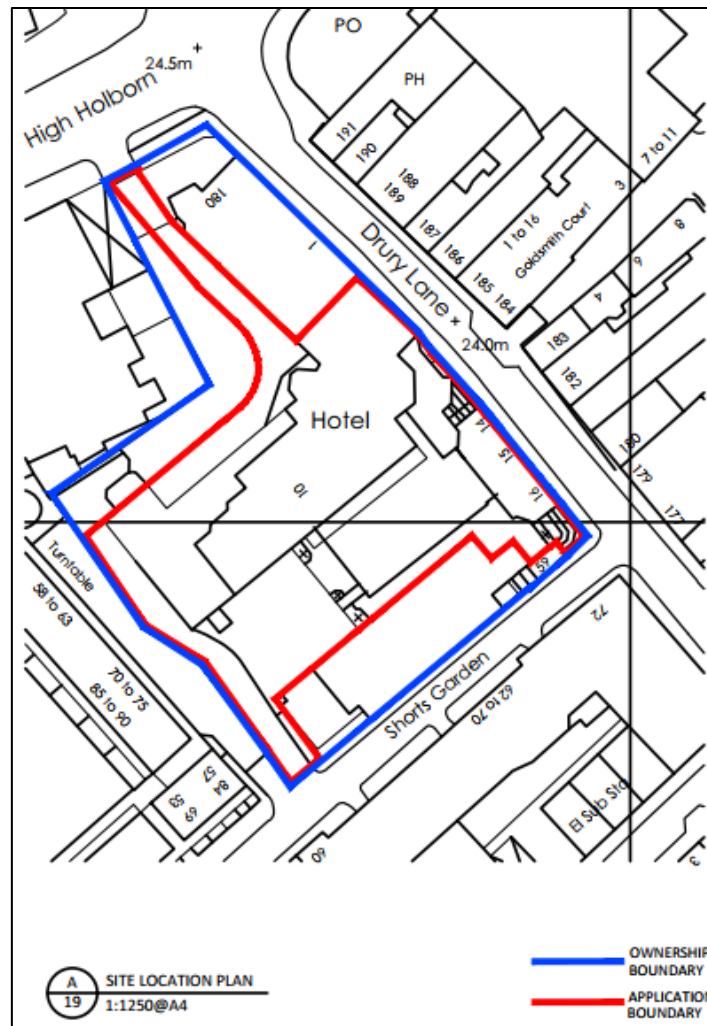


Figure 1: Site Location Plan

2.11 As illustrated in Figure 2 below, located in Central London, the site benefits from excellent accessibility to public transport (Public Transport Accessibility Level of 6b) including:

- Covent Garden Station, located approximately 300 metres south of the site, providing London Underground (Piccadilly line) services.
- Holborn Station, located approximately 330 metres northeast of the site, providing London Underground (Piccadilly & Central lines) services; Bus services towards Euston and towards Holborn Circus or Old Street.
- Tottenham Court Road Underground Station, located approximately 410 metres northeast of the site, providing London Underground (Central, Northern & Elizabeth lines) services.
- The site lies near 38 frequent bus services with numerous bus routes passing the site along High Holborn.

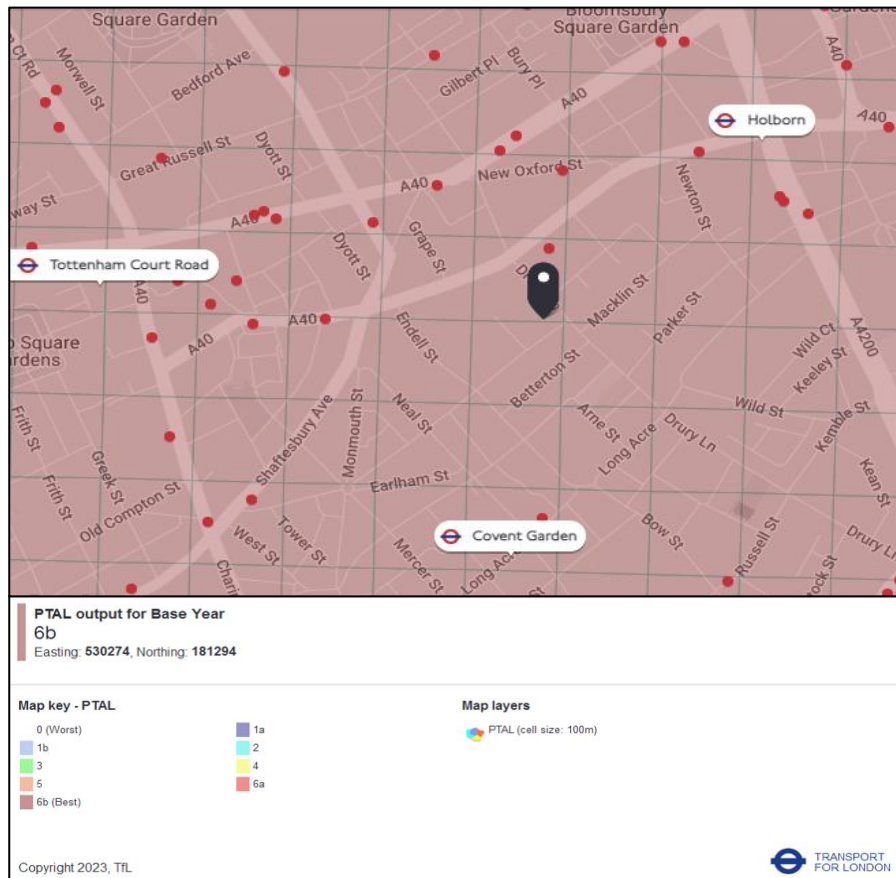


Figure 2: Transport for London PTAL Map (site location marked by black marker)

Designations

2.12 The site is subject to the following designations, as shown in Figure 3 below:

- Central Activities Zone (CAZ)
- Central London Area (red line boundary)
- Protected secondary frontage (orange shading)
- Archaeological Priority Area (brown lines boundary)

2.13 Outside of the application site boundary, the Conservation Area ‘Seven Dials’ lies immediately to the east on the eastern side of Drury Lane (yellow shading with grey boundary line).

2.14 North of the site lies the ‘Tottenham Court Road’ Growth Area which extends from High Holborn (purple outline).

2.15 To the west lies site No. 164 ‘Dudley Court Gardens’ which is designated as Open Space (green outline).

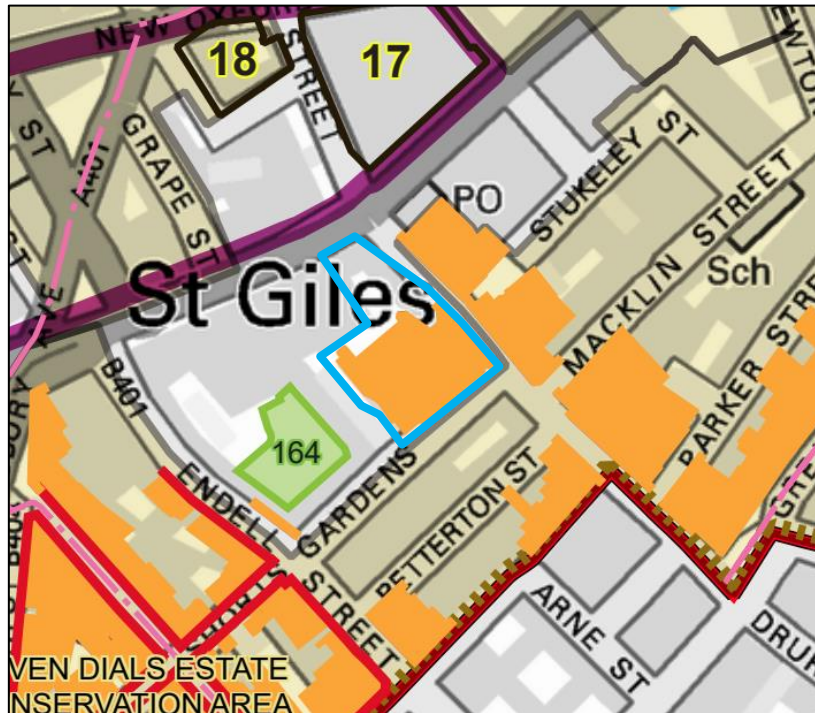


Figure 3: Extract of the Council's Policies Map (dated August 2021)
(approximate hotel site outline marked in blue)

- 2.16 The site does not include any statutory or locally listed buildings. The site is located within an Archaeological Priority Area but does not accommodate any Scheduled Ancient Monuments.
- 2.17 The site is located entirely within Flood Zone 1, with a very low risk of flooding from rivers or the sea. The site is also shown to be mostly located in an area of very low risk of surface water flooding, save for a small area of low to medium risk of surface water flooding.

Planning History

- 2.18 The key planning history of the site as obtained from Camden's on-line records is set out in Table 1 below. There are no records accessible for the original planning permission for the site.
- 2.19 Some key points to note are as follows:
- The earliest history dates from 1991 when the building was the Drury Lane Moat House Hotel.
 - Various minor applications were approved between 1991 and 2005
 - A new double height extension was permitted to the offices comprising St Giles House in 2008. This was never implemented.
 - Permission was granted in 2009 for the change of use of St Giles House to hotel accommodation, as a 249 bedroom extension to the Travelodge, alongside an extension to the existing reception/bar/restaurant at raised podium level. This was implemented.
 - In 2015 a further 6 rooms were added to the hotel alongside a small retail unit by infilling a small undercroft area to High Holborn.
 - In 2019, following a trial period, permission was granted to use the raised terrace area outside the hotel entrance to Drury Lane for seating associated with the hotel's bar/restaurant.

Table 1. Summary of historic planning applications relating to the Travelodge Hotel

Reference:	Address:	Proposal:	Decision and date:
2023/1021/P	Travelodge Hotel 10 Drury Lane London WC2B 5RE	Erection of two storey extension forming new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of undercroft at level 3 and new flat roof link to extend existing hotel bar/restaurant	Withdrawn July 2023
2019/2643/P	Travelodge Hotel 10 Drury Lane London WC2B 5RE	Variation of condition 6 (use of flat roofs as amenity terraces and commercial drinking/ eating areas) of planning permission dated 07/10/09 ref: 2009/2628/P (for change of use from office to hotel with erection of single storey glazed extension to Drury Lane elevation; replacement of glazed wall with rendered wall and new fire exit to High Holborn elevation), namely to allow outdoor seating associated with the hotel on the raised terrace adjoining its front entrance on Drury Lane.	Granted Subject to Section 106 20/06/2019
2015/5430/P	Travelodge Hotel 10 Drury Lane London WC2B 5RE	Infilling of colonnade at ground and first floor level to provide 6 additional hotel rooms and separate ground floor retail unit (Use Class A1)	Granted Subject to Section 106 05/10/2015
2009/2628/P	St Giles House, 1 Drury Lane, 10-12 Drury Lane, 14-16 Drury Lane, 59 Shorts Gardens and 180 High Holborn London WC2B 5RS	Change of use from office (Class B1) to hotel (Class C1) with erection of single storey glazed extension to Drury Lane elevation; replacement of glazed wall with rendered wall and new fire exit to High Holborn elevation. Associated alterations to car parking layout and other ancillary works.	Granted Subject to Section 106 09/07/2009
2008/3325/P	St Giles House 1 Drury Lane London WC2B 5RS	Erection of new double height extension to Drury Lane frontage of existing office building to house new reception.	Granted 04/08/2008
2005/1201/P	Travelodge 10 Drury Lane London WC2B 5RE	Change of use of meeting rooms (originally retail outlets - use class C1) , associated with the existing hotel, to hotel accommodation (use class C1).	Granted 16/05/2005

2004/4434P	10 Drury Lane London WC2B 5RE	Various alterations to the building elevations comprising the replacement of a door with a solid panel and window, replacement of 2 windows with solid panels, and installation of 6 new windows, all at car park level, and replacement of revolving door with automatic doors, replacement of window with door, replacement of door with solid panel and window, and replacement of fixed window with opening window, all at main entrance level.	Granted 20/10/2004
PSX0205304	St Giles House 180 High Holborn	Installation of 2.5 metre - 3 metre high fencing on Drury Lane and High Holborn frontages together with a gate on High Holborn entrance, as shown on: Unnumbered proposed floorplans and elevations.	Granted 07/03/2003
P9600109	Drury Lane Moat House, Drury Lane, WC2	Alterations to the ground floor on the Shorts Gardens frontage, as shown on drawing number 9034/2.	Granted 29/03/1996
9401697	Drury Lane Moat House, Drury Lane WC2	Alterations including the insertion of two new windows and a plant ventilation opening at level 4. as shown on drawing 8881/3 4 5 & 6.	Granted 16/12/1994
9100708	Drury Lane Moat House, Drury Lane WC2	The change of use of two retail units to use for office /meeting room ancillary to hotel as shown on drawing numbers 860627:10 & 860627:11.	Granted 04/09/1991

3 Proposed Development

3.1 This section provides a detailed description of the proposed development.

3.2 The formal description of development is:

“Erection of two storey extension forming new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of undercroft at level 3 and new flat roof link to extend existing hotel bar/restaurant”

The Purpose of The Application

3.3 The purpose of the submitted application is twofold.

3.4 Firstly, it proposes to overcome the current access constraints by replacing the northern flight of steps from Drury Lane with a new step free (accessible) entrance accommodated within a single and set back two storey entrance lobby building incorporating a lift. This will provide an inclusive entrance to the hotel. The existing access ramp from Shorts Gardens will be retained but will very much become a secondary accessible entrance in the event of lift failure; new security railing will also be added to this ramp to prevent misuse and vagrancy. The entrance structure design has been refined through pre-application discussions and is in a similar location to a new entrance that was granted in 2008 for a new entrance to the St Giles House office building that has subsequently become part of the hotel. The new entrance building will be modern in appearance, but also reflecting the existing hotel design, will incorporate a blue/green roof on both roof levels. A blue/green roof is also proposed to adjacent flat roof above the shops fronting Drury Lane following local resident consultation.

3.5 The second purpose of the application is to make the best and most sustainable use of the site by infilling the car parking area that is located at levels 1 and 2 with new hotel bedrooms. The car parking area is underutilised and its retention does not accord with Travelodge’s new sustainability plan ‘Better Future’. The car park occupies a double height space and its re-use will be maximised through firstly constructing hotel bedrooms on the current surface of the car park and then also adding another floor of bedrooms above at level 2. All bedrooms will be windowless as they will be accommodated within an enclosed area. A new bedroom concept has been developed by Travelodge for these rooms. 22 car parking spaces will be removed from the site as a result of the scheme, with two accessible spaces re-provided for on site.

3.6 As a consequence of the extra bedrooms proposed, the hotel’s reception and bar/restaurant facilities need to be extended. As part of this the current space will be reorganised and will be extended predominantly into a double height undercroft space at level 3 to the rear of the hotel and adjacent to Shorts Gardens. This space is open to the elements to the north east sitting behind the current bar/restaurant building. The space is underutilised with its use limited to a temporary luggage store in one corner. On its southwest elevation there is a section of double height glazing set within aluminium framing; this will be replaced as part of the development.

3.7 From the above there are three main elements to the application:

- New entrance lobby building from Drury Lane
- Re-purposing of the car park to provide new hotel bedrooms
- Extension of bar/restaurant building at podium level and into undercroft area

3.8 These are examined in more detail below.

Design Development

- 3.9 The proposals have been designed by JWA architects who have acted as the architects for several Travelodge hotels in London.
- 3.10 The proposals are design-led and have been informed by a detailed contextual analysis of the site and its surroundings. The analysis has identified underutilised spaces, including the existing raised courtyard area and the undercroft to the rear of the hotel at level 3. The new entrance design has also been informed by public consultation and pre-application discussions with Camden.

New Entrance

- 3.11 As shown in Figure 4, the proposal includes the removal of the existing stepped access to the level 3 raised courtyard to be replaced with an entrance lobby/reception extension which is single storey to the street frontage with a two storey set back. The proposal will provide a new enclosed entrance lobby at street level with the construction of a new dropped slab to provide level access off Drury Lane.
- 3.12 The new enclosed entrance lobby at street level will provide a more legible and accessible hotel that everyone can use, with new lift with direct access to the heart of the hotel, reception and new accommodation.

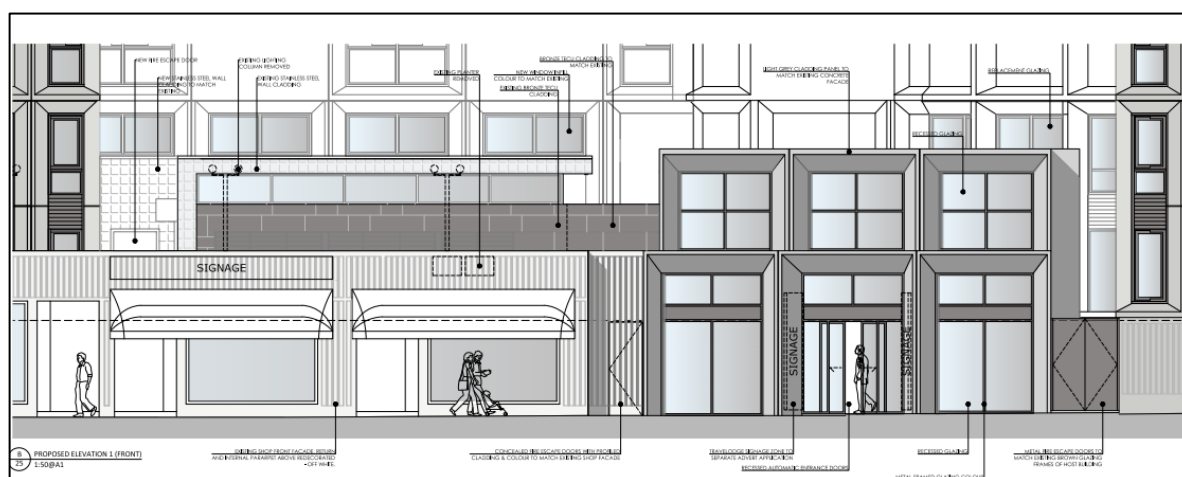


Figure 4: Proposed New Entrance (drawing J9348 – 25H)

- 3.13 The proposed reception/lobby extension has been carefully designed to complement the existing building and to avoid overlooking/overshadowing of neighbouring properties. The height of the single storey section aligns with the shopfronts and the two-storey section broadly aligns with the height of the 2009 permitted extension, as completed in 2012. The proposal includes a recessed internal staircase removing access to the existing raised terrace to the side of the retail units.
- 3.14 Both sections of new roof will comprise blue/green roofs to help attenuate surface water runoff, increase the biodiversity within the area and significantly improve the visual amenity for hotel guests and residents. The new blue/green roof system will use Sedum vegetation blankets and moisture retention system which is fire rated under BS476 Part 3: 1958.
- 3.15 As part of the Drury Lane frontage works, a blue/green roof is also to be added to the adjacent flat roof area above the shops fronting Drury Lane. The existing lighting columns will also be removed from this area. The shops fronts will also be refreshed and repainted as part of a wider scheme of improvement works.

3.16 The new entrance lobby off Drury Lane extends to 88sqm GIA (97sqm GEA).

Re-Purposing Car Pak

3.17 The proposals involve the two-storey infilling of the double height car parking area at level 1 and 2 to provide 55 additional bedrooms.

3.18 28 additional rooms are to be provided at existing car parking level (level 1), then above this a new floor is proposed which extends to 688 sqm GIA (710sqm GEA) and will accommodate a further 27 bedrooms. Six bedrooms will be Accessible equating to 11%.

3.19 The new bedrooms at Level 1 are shown on drawing J9348 – 20E and the new bedrooms at level 2 are shown on drawing J9348 – 21G. An extract from drawing 20E is below

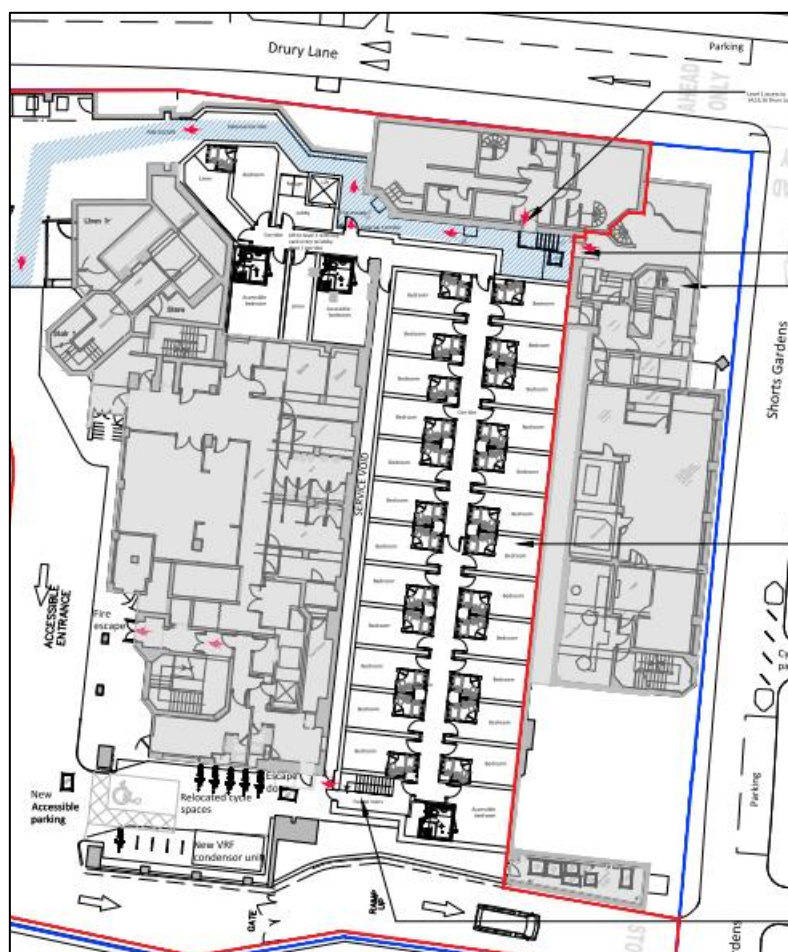


Figure 5: Proposed Level 1 (drawing J9348 – 20E)

3.20 The current limited openings to the undercroft car park will be closed up as part of the works, as shown on drawing J9348 – 27B. This drawing also shows the new railings proposed to the disabled access ramp.



Figure 6: Proposed Infill Elevations (drawing J9348 – 27B)

Extension of bar/restaurant

- 3.21 Towards the rear of the hotel from Drury Lane, the existing two-storey undercroft at level 3 will be infilled creating a larger bar/restaurant allowing the hotel to cater for the increased number of bedrooms. This undercroft area to be infilled is the white area located within the red line, as shown on the level 4 (roof level) plan below – Figure 7.
- 3.22 There will also be a small extension in the open courtyard area linking the undercroft area with the existing bar/restaurant structure. This extension will have a flat roof, as shown in grey below and links the existing green roof to the existing hotel in a similar way to that already in place on two other sides.
- 3.23 The existing undercroft has full height glazing creating a sheltered space. The proposal will implement a 'like for like' replacement with a thermally broken glazing system creating a weather tight internal space with obscure glazing to maintain privacy for users and neighbouring buildings. This drawing also shows the three new blue/green roofs proposed to the Drury Lane frontage.
- 3.24 The new undercroft infill and linking extension for the bar/restaurant extend to 241sqm GIA (248sqm GEA).

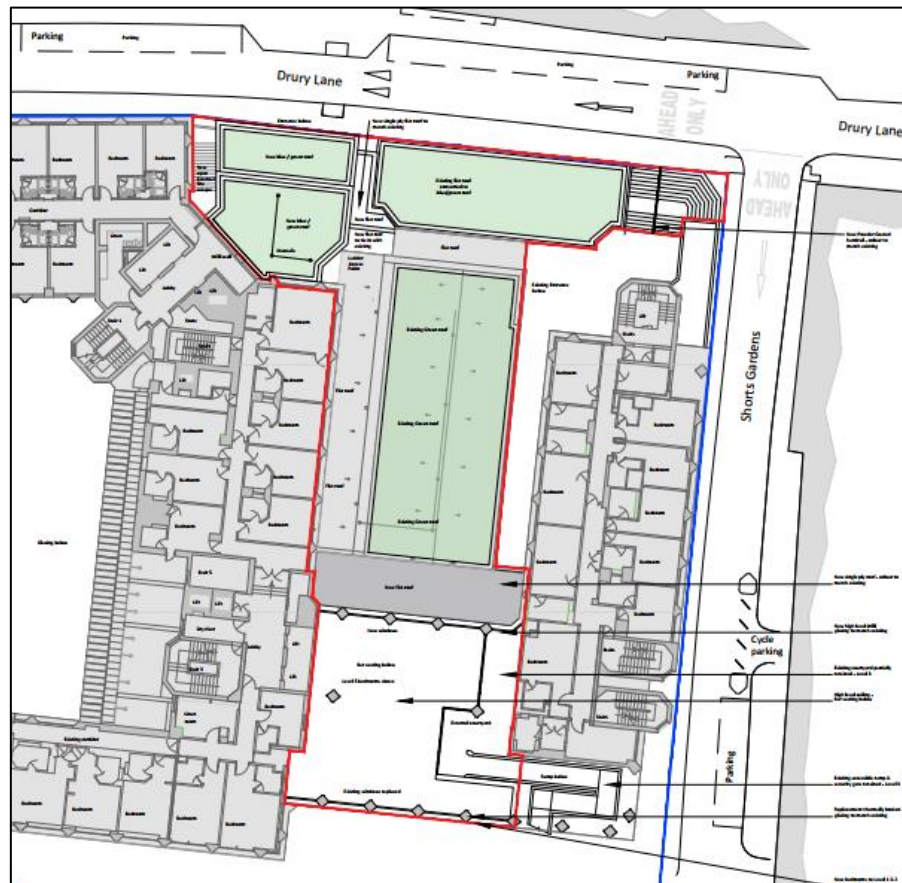


Figure 7: Proposed Level 4 (drawing J9348 – 23H)

Building Accessibility

- 3.25 The new hotel entrance will provide a level access directly off Drury Lane into a dedicated entrance lobby at level 2 (street level). The entrance connects directly with a new internal lift providing access to the main reception floor and two new levels of accommodation below.
- 3.26 The existing access ramp from Shorts Gardens will remain but will very much become a secondary accessible entrance in the event of lift failure. The undercroft infill extension forming the new bar/restaurant area will have a new connecting ramp to provide an accessible link with the reception area.
- 3.27 The following building access features have been incorporated:
- Lift access to all floors within the building.
 - 6 fully compliant accessible bedrooms compliant with the London Plan.
 - 1500mm wide corridors to allow for accessible access to all bedrooms and provide sufficient passing space within corridors.
 - All internal door widths to have a minimum clear opening of 800mm.
 - Staff trained in the basic evacuation procedures so that they are responsible for assisting people getting out of the building during emergencies.
 - Refuge areas on all staircases for assistance during evacuation.
 - Induction loops where required to assist hearing impaired guests and visitors.

Vehicular Access and Servicing

- 3.28 Vehicular access to and from the site will remain as existing via High Holborn and through the site before exiting onto Shorts Gardens.
- 3.29 All general needs parking will be removed and replaced with loading and disabled bays as required for operational use. 22 car parking spaces will be removed from the site as a result of the scheme with two accessible spaces re-provided for on-site with this being the only remaining parking.
- 3.30 The proposal includes six new bicycle parking spaces, two of which are short stay, providing a total of 34 bicycle parking spaces.
- 3.31 All waste collection and deliveries to the hotel will remain as existing.
- 3.32 During construction the majority of construction delivery vehicles will access and egress the site from High Holborn, with vehicle movements on Shorts Gardens to be minimised. This was a request of local residents during public consultation.

Sustainability

- 3.33 The proposed development has been designed to incorporate a range of sustainability measures, set out below, and overall targets a BREEAM 'Very Good' rating:
- Air source heat pumps for space heating and cooling
 - Improve U-values of the external envelope
 - Improve U-value of glazing
 - Improve air permeability of the envelope
 - Improved efficiency of the space heating, cooling and hot water
 - Use of energy efficient lighting
 - Use of intelligent lighting controls
 - Use of variable speed pumps, fans and drives to match supply and demand
 - Use of heat recovery to mechanical ventilation systems
- 3.34 The full details of the energy measures are set out within the Energy and Sustainability Statements carried out by Hydrock.

4 Planning Policy

- 4.1 This Section of the report sets out the relevant planning policy for the proposed development.
- 4.2 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.
- 4.3 The Development Plan comprises the London Plan (March 2021) and the Camden Local Plan (July 2017).
- 4.4 The Council has adopted a number of Supplementary Planning Documents and Guidance which are also material considerations in the determination of the application.
- 4.5 The National Planning Policy Framework (NPPF) (2023) is also a material consideration in the determination of the application. The NPPF is supported by the National Planning Practice Guidance (NPPG).

London Plan

- 4.6 The following policies are relevant to the proposals:
- Policy SD4 The Central Activities Zone (CAZ)
 - Policy D3 Optimising site capacity through the design-led approach
 - Policy D4 Delivering good design
 - Policy D5 Inclusive design
 - Policy D11 Safety, security and resilience to emergency
 - Policy D12 Fire safety
 - Policy D14 Noise
 - Policy E10 Visitor infrastructure
 - Policy HC1 Heritage conservation and growth
 - Policy G5 Urban greening
 - Policy S11 Improving air quality
 - Policy S12 Minimising greenhouse gas emissions
 - Policy S14 Managing heat risk
 - Policy S12 Flood risk management
 - Policy S13 Sustainable drainage
 - Policy T1 Strategic approach to transport
 - Policy T2 Healthy streets
 - Policy T4 Assessing and mitigating transport impacts
 - Policy T5 Cycling
 - Policy T6 Car parking
 - Policy T6.4 Hotel and leisure uses parking
 - Policy T6.5 Non residential disabled persons parking

Camden Local Plan (CLP)

4.7 The following policies are relevant to the proposals:

- Policy G1 Delivery and location of growth
- Policy C1 Health and wellbeing
- Policy C6 Access for all
- Policy E3 Tourism
- Policy A1 Managing the impact of development
- Policy A3 Biodiversity
- Policy A4 Noise and vibration
- Policy D1 Design
- Policy D2 Heritage
- Policy H2 Maximising the supply of self-contained housing from mixed-use schemes
- Policy C5 Safety and Security
- Policy CC1 Climate change mitigation
- Policy CC2 Adapting to climate change
- Policy CC3 Water and flooding
- Policy CC4 Air Quality
- Policy CC5 Waste
- Policy T1 Prioritising walking, cycling and public transport
- Policy T2 Parking and car-free development

Camden Planning Guidance (CPG)

4.8 Relevant CPG documents are as follows:

- Amenity (January 2021)
- Access for All CPG (March 2019)
- Air Quality (January 2021)
- Design (January 2021)
- Energy efficiency and adaption (January 2021)
- Transport (January 2021)
- Water and flooding CPG (March 2019)

National Planning Policy Framework (2023)

4.9 The NPPF sets out the Government's planning policies for England and how they are expected to be applied. Section 2 of the Framework recognises that there are three overarching objectives to achieving sustainable development, namely, economic, social and environmental. In regard to the three roles, the NPPF states:

- *“a. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *b. a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible*

services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- *c. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

4.10 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 sets out that for decision-taking this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

4.11 The following NPPF sections are relevant:

Section 6: Building a strong competitive economy

Section 9: Promoting sustainable transport

Section 11: Making effective use of land

Section 12: Achieving well designed places

Section 15: Conserving and enhancing the natural environment

Section 16: Conserving and enhancing the historic environment

5 Planning Assessment

5.1 This section of the report provides a detailed assessment of the proposals against all relevant national and local planning policies, as well as addressing all other material considerations. It addresses the following planning issues in turn:

- Principle of Development:
 - New entrance
 - Additional hotel bedrooms
 - Hotel bar/restaurant extension
 - Mixed use development
- Design and Access
- Heritage
- Sustainable Design and Construction
- Transport
- Flood Risk and Drainage
- Fire Engineering
- Noise
- Air Quality
- Construction Management
- Planning Obligations and CIL

Principle of Development

New Entrance

5.2 Policy E10 “Visitor Infrastructure” of the London Plan outlines the support for enhancing visitor accommodation stating:

“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”

5.3 Camden Local Plan (CLP) Policy C6 “Access for all” and London Plan (LP) Policy D5 “Inclusive design” require developments to be accessible, inclusive and contribute to strong and protected communities. The policies seek the removal of any disabling barriers and aim to improve the convenience and access of developments.

5.4 Improving accessibility and convenience is a principal purpose of the application. The proposal will remove the existing stepped access and provide a new step free access at street level. This will remove the need for some people having to traverse all the way to the rear of the site to enter the hotel and provides an entrance that can be used by everyone with dignity.

5.5 CLP Design Policy D1 “Design” and LP Policy D4 “Delivering good design” of the London Plan seek good design in developments which comprise details and materials that are of high quality and complement the local character.

5.6 The proposed entrance extension has been carefully designed to ensure the development is appropriate to the area, avoids overlooking/overshadowing the neighbouring properties and supports sustainable improvements, including blue/green roofs. Residential amenity is protected and perhaps

also enhanced through constructing the new entrance, as the current level 3 terrace area that can be used for eating and drinking associated with the hotel will be removed.

- 5.7 The proposed extension with new street-level access will strengthen the hotel's facilities and provide new high quality development in line with Policy E10 "Visitor infrastructure" of the London Plan. The proposals will also improve the design, visual amenity and accessibility of the site, meeting the inclusivity and design principles set out in the Development Plan.

Additional Hotel Bedrooms

- 5.8 The proposals include the creation of 55 additional bedrooms. There is a great deal of planning policy support for this, particularly given the site's location within the CAZ and Central London which are supported locations for new visitor accommodation as set out in the Development Plan.
- 5.9 CLP Policy G1 "Delivery and location of growth" expects development to be in highly accessible areas with abundant transport links.
- 5.10 Section 6 of the NPPF refers to building a strong, competitive economy. Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.11 The importance of London's visitor economy and visitor accommodation is recognised in the London Plan Policy E10 "Visitor infrastructure" and CLP Policy E3 "Tourism" provides a positive approach to additional hotel accommodation within Central London locations.
- 5.12 Paragraph 5.56 of the CLP states:
- "Visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London. The London Plan sets a target of achieving 40,000 net additional hotel rooms by 2036 across London."*
- 5.13 The additional hotel bedrooms proposed will contribute to meeting the expected increased demand for visitor accommodation in Central London and will help achieve the desired 40,000 net additional hotel bedrooms. The increase in hotel users will also provide a valuable ancillary service, helping to sustain businesses and services operating within the local area from increased footfall.
- 5.14 The development includes windowless rooms which are an increasingly common hotel concept in London. Many hotel developments are now featuring windowless rooms including:
- Zedwell Piccadilly Circus Hotel
 - The Standard, Kings Cross
 - Indigo Hotel, Leicester Square
 - Mimi's Hotel, Soho
 - Various Hub by Premier Inn hotels
 - Various Z Hotels
- 5.15 The principle of a hotel bedroom expansion is supported by the Development Plan and will be in keeping with the local context, the site being located in Central London and in an area of excellent access to public transport.

- 5.16 The removal of on site car parking is a further benefit of the proposed scheme consistent with Central London planning policies to reduce car parking and reliance upon the private car.
- 5.17 Therefore, the proposal to replace the existing car park and to create a new floor to provide 55 additional hotel bedrooms is in accordance with the Development Plan and should be supported.

Hotel Bar/restaurant Extension

- 5.18 London Plan Policy D3 “Optimising site capacity through the design-led approach” and CLP Policy G1 “Delivery and location of growth” require development to optimise site capacity and Section 11 of the NPPF outlines the need for development to make effective use of land.
- 5.19 The proposal will have little impact on the site’s surroundings and makes the effective use of the land available by maximising the existing site layout and use of this previously developed land.
- 5.20 The existing two-storey undercroft space at level 3 is currently underused acting partly as a luggage store only and will be infilled to create a larger bar/restaurant to cater for the increased occupancy of the hotel. The space’s existing full height glazing will be replaced ‘like for like’ with obscure glazing that maintains privacy for users and neighbouring properties.
- 5.21 The extension of the hotel’s facilities is supported by London Plan Policy E10 “Visitor infrastructure” which specifically endorses the extension and enhancement of visitor attractions, experience and the supporting infrastructure.
- 5.22 In light of the above, the principle of a hotel bar/restaurant extension is in accordance with local and national policy objectives and should be supported.

Mixed Use Development

- 5.23 CLP Policy H2 “Maximising the supply of self-contained housing from mixed use schemes” outlines that where non-residential development is proposed, Camden Council will promote the inclusion of self-contained homes as part of a mix of uses. Within the Central London Area, development involving additional floorspace of more than 200sqm (GIA) will require 50% of the additional floorspace to be self-contained housing, subject to a number of considerations.
- 5.24 Whether self-contained housing is required as a part of a mix of uses, the policy sets out that the Council will take into account the following considerations:
- a. *“the character of the development, the site and the area;*
 - b. *site size and any constraints on developing the site for a mix of uses;*
 - c. *The priority the Local Plan gives to the jewellery sector in Hatton Garden areas*
 - d. *whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and*
 - e. *whether the development is publicly funded or serves a public purpose”*
- 5.25 Paragraph 3.41 confirms that *“...a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought”*
- 5.26 Paragraph 3.46 advises that *“For the Central London Area and the specified town centres, Policy H2 provides distinct considerations and criteria used to determine whether a development is required to provide housing as part of a mix of uses...”*

- 5.27 Paragraph 3.47 under the heading “Whether housing is required” reinforces the policy and makes it very clear that *“Proposals for additional non-residential floorspace in the Central London Area and specified town centres will be required to provide housing subject to assessment against criteria a) to e) in Policy H2”*.
- 5.28 This is the first part of the policy or the ‘gateway question’. If and only if the answer to the first question is ‘yes’, the second part of the policy is to be considered as to whether self contained housing comprising 50% of all additional floorspace should be provided on site, or whether instead housing would be more appropriately provided off site (whether through provision on an alternative site nearby or exceptionally a payment in lieu). For this question, account must be taken of criteria a)-e), as well as additional criteria f)-j).
- 5.29 To aid consideration of the first part of the policy, paragraph 3.48 sets out a number of examples of proposals that would not be required to provide housing. These include:
- *“The additional floorspace is 200sqm (GIA) or less”*
 - *“The development is unable to create an acceptable level of residential amenity; e.g. inadequate daylight and sunlight, or other activities nearby would cause unacceptable harm to residential amenity e.g. levels of noise and vibration”*
 - *“The development involves an extension to an existing building.....that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts”*.
- 5.30 An assessment is undertaken below on the suitability of the site for housing having regard to criteria a) to e) of Policy H2, and then with reference to the examples cited under paragraph 3.48.

Criteria a) to e)

a. the character of the development, the site and the area

- 5.31 The character of the application site and development forms part of a wider hotel use, with minimal unused space, complex changes in levels, and daily operational requirements and restrictions. The application site is limited to part of the hotel use on site, comprising a double height underground void area currently used for parking, an undercroft area behind the current bar/restaurant, and a terrace area and set of steps fronting Drury Lane.
- 5.32 The character of the site and development is clearly a hotel and leisure use and it would not be compatible to locate any self-contained housing within the application site. There is no policy requirement for the wider hotel building, located outside of the red line, to be considered for adaptation to provide an element of self contained housing. This in any event would not be possible as it is not possible to ‘hive off’ any part of the existing hotel to be used for other purposes, as it would fundamentally alter the operation of the hotel, its access/egress, fire escape strategy, energy strategy, as well as requiring new dedicated residential access, servicing, and means of escape amongst many other matters.
- 5.33 The fact the hotel sits in a mixed use commercial and residential area has no bearing upon the ability of the site to accommodate self contained housing. The wider area may be suitable for housing, but the character of the development and the site itself means it is not suitable.

b. site size and any constraints on developing the site for a mix of uses

- 5.34 The majority of new floorspace comprises re-purposing and infilling a lower ground floor level car park, with this representing a significant site constraint to developing residential as there is no outlook,

access to daylight, natural ventilation, or independent means of access amongst many other matters. It is clearly not feasible to locate any self-contained housing in this underground area.

- 5.35 The new floorspace at ground floor or podium level then either comprises a new entrance structure or an extension to an existing hotel bar and restaurant predominantly into an undercroft area beneath the existing hotel. This is a further clear constraint to residential, as residential cannot be placed to the Drury Lane frontage in place of the hotel entrance or tucked away in the undercroft area behind the hotel's food and beverage facilities. Residential development is not feasible or compatible in these locations and would also prevent the hotel from expanding its guest facilities, which is a definitive operational requirement of the hotel.
- 5.36 For the avoidance of doubt it is only necessary to consider the proposed development itself and the additional floorspace it would create, rather than also consider whether any of the floorspace in the existing hotel building is suitable for housing. That is clear from the focus of policy H2 on the provision of 'additional floorspace'. However, even if there was a requirement to consider the wider building it is not possible to interpose residential accommodation into an operational hotel for many reasons including: access, security, fire escape, amenity and day to day functioning.

c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area

- 5.37 Not relevant in this instance.

d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;

- 5.38 Accommodating housing within the existing hotel complex at lower or ground floor level would not be compatible with the operational requirements of the hotel on a day to day basis or at a wider strategic level through prejudicing the provision of expanding guests services in the form of a new entrance, reconfigured reception and expanded bar/restaurant. The current hotel has evolved over time and is a complex site with many levels and access points and interconnected corridors, but a key aspect of its layout is that all guest routes feed back to the reception and all areas feed into a wider fire escape strategy that can't be prejudiced.

e. whether the development is publicly funded or serves a public purpose

- 5.39 Not relevant in this instance.

Paragraph 3.48 Examples

- The development is unable to create an acceptable level of residential amenity; e.g. inadequate daylight and sunlight, or other activities nearby would cause unacceptable harm to residential amenity e.g. levels of noise and vibration*

- 5.40 The proposed infilling of lower floor levels 1 and 2 for hotel bedrooms and the provision of windowless hotel bedrooms is an acceptable form of development for transient hotel stays. However, windowless residential development would not be acceptable having regard to residential amenity e.g. inadequate daylight and sunlight, ventilation, outlook, and also due to noise and disturbance caused by day to day hotel operations nearby. An acceptable level of residential amenity would also not be possible to achieve for the level 3 infill due to its enclosure by hotel use on three sides with associated hotel activity and also its single aspect nature.

- “The development involves an extension to an existing building.....that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts.”

5.41 The development entirely comprises an extension to an existing building and new features cannot be accommodated at lower ground levels necessary to support housing, or at ground floor / podium level in the tight courtyard or undercroft area. There is no space within the application site to provide housing and no way of creating additional entrances, staircase, lifts, or means of escape.

Scheme Plans

5.42 To help illustrate the constraints of the site to incorporating housing a number of plans are provided below, which have been taken from the Fire Strategy. These are the application plans but marked up with the fire escape routes, which obviously show these routes but also help illustrate other site constraints.

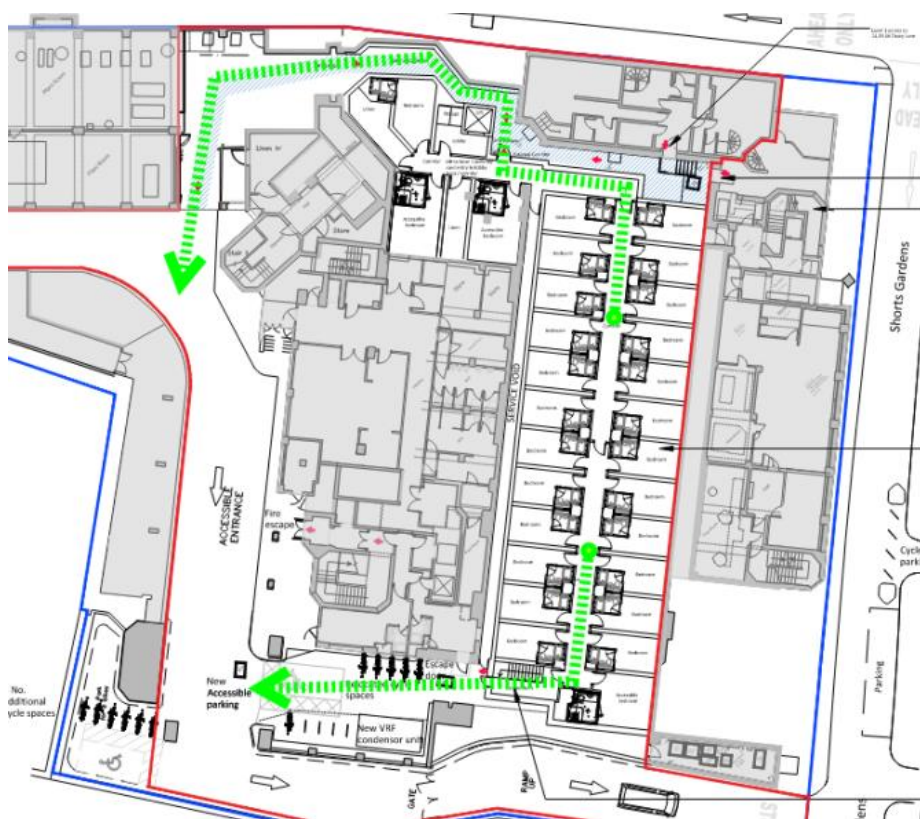


Figure 8: Proposed Level 1 Exit Routes

5.43 This plan shows the lowest level of the hotel where bedrooms are proposed in the current underground parking area, with back of house hotel facilities located either side as indicated by the grey shading, with other hotel accommodation located above. The hotel bedrooms will be windowless and whilst acceptable for hotel use is not acceptable for self contained residential use. The only means of access to this area is via the new lift proposed in the new entrance lobby, which can't be shared between hotel and residential uses. The means of escape routes shown in green also help demonstrate the limited access to this area, with these means of escape routes discharging to the vehicle servicing route that runs through the site that is gated at either end for security and to prevent cars rat running from Drury Lane to Shorts Gardens that used to occur. Therefore, these means of escape routes can't be turned into means of access to residential accommodation even in the event that it was a suitable location for residential. One of the means of escape also acts as an escape route from level 2.



Figure 9: Proposed Level 2 Exit Routes)

- 5.44 This plan shows the new floor of hotel bedrooms that is to be placed on top of the new level 1 bedrooms by inserting a new floor to the underground car park. The area is enclosed by existing hotel bedrooms and some back of house facilities. Again the area is enclosed and so the hotel bedrooms will be windowless and this is not a suitable location for residential.
- 5.45 The only means of access to this area is via the new lift and staircase proposed in the new entrance lobby. This also forms one of the means of escape. The others means of escape links into level 1 and discharges to the vehicle servicing route running through the site. None of these entrances or means of escape can be turned into a means of access to residential accommodation, in the event it was a suitable location for residential.
- 5.46 This plan also shows the new entrance lobby to Drury Lane, which is essential to the functioning of the hotel and a vital part of the proposed scheme.
- 5.47 In light of the above, the level 1 and 2 areas within the application site are clearly not suitable for residential.



Figure 10: Proposed Level 3 Exit Routes

- 5.48 This plan of level 3 shows the reconfigured hotel reception and bar / restaurant with the new entrance lobby coming up from Drury Lane and the bar/restaurant extension to the undercroft area to the rear.
- 5.49 As above the new entrance lobby to Drury Lane is essential to the functioning of the hotel and feeds into the reception area. The reception itself and the bar/restaurant are being reconfigured but does not require planning permission as these are internal works. None of these areas are therefore available or suitable for residential.
- 5.50 The extension to the rear undercroft area is an essential component of the scheme as expanded food and beverage facilities are required for the hotel. The area is therefore required for the proper functioning of the hotel and not available for residential use.
- 5.51 Even if it was available the three significant constraints to its development are: that it is an enclosed area surrounded on three sides by active hotel use, would only allow single aspect units, and no means of access could be provided to it as all potential access points are already fire escape routes to the hotel and these cannot be combined residential and hotel access and fires escape routes.
- 5.52 In light of the above the level 3 areas within the application site are clearly not suitable for residential.

Summary

- 5.53 From all the above the site is clearly not suitable for housing. Self-contained housing is not practical or appropriate to accommodate within the application site and is not required having regard to the criteria set out under the policy, as supplemented by supporting paragraph 3.48. The first part of the policy or the 'gateway test' is therefore satisfied. The second part of the policy (whether self contained housing should be provided on site, offsite or via a payment in lieu) does not need to be addressed.

5.54 The proposed scheme in not proving self contained housing in the proposed non residential development is therefore in accordance with CLP Policy H2.

Design and Access

5.55 Policy C1 “Health and wellbeing” and C6 “Access for all” of the CLP and Policy D5 “Inclusive design” of the London Plan require development to positively contribute to creating convenient and accessible places which can be used safely and with dignity by all.

5.56 The analysis, design and development of this project has been undertaken with reference to Camden’s ‘Access for all’ CPG which provides information on Access within the borough. The ‘Key Messages’ of the CPG highlight the need for development to be accessible, inclusively designed and useable by all to promote equality of opportunity.

5.57 The replacement of the existing stepped access with a new accessible street-level entrance will remove the need for some people to traverse all the way round to the rear entrance via Shorts Gardens and provides a new entrance that is usable by all. Inclusive design has been fully considered with numerous building access features incorporated as outlined in paragraphs 3.25-3.27 of this Planning Statement.

5.58 These design principles will significantly promote the convenience of the hotel and provides an accessible entrance which can be used by everyone with dignity, promoting equal access opportunities in line with Development Plan policies and the key messages of the ‘Access for all CPG’.

5.59 CLP Policy A1 “Managing the impact of development” and D1 “Design”, and LP Policy D3 “Optimising site capacity through the design led approach” and D4 “Delivering good design” refer to the design requirements of development. These policies require the quality of life of occupiers and neighbours to be protected and outline that development should be of a high quality design which relates to, and respects, the surrounding local context and character.

5.60 Section 12 of the NPPF seeks to achieve well designed places. Paragraph 130 seeks development that will function well; is visually attractive, sympathetic to local character (whilst not preventing appropriate change) and will add to the quality of the area; and optimises the potential of the site.

5.61 In contrast to the heavy mass of the existing concrete clad building, the new extension will pick up on the proportions and profiled detailing of the existing host building. The proposed facade will be clad in light grey cladding panels to match the concrete of the existing host building. The result is a visually engaging and contemporary entrance feature as a counter point to the heavy mass of the existing building. The architectural detail creates visual interest to the façade and improves the quality and character of the area with good design in accordance with LP policies D3, D4 and CLP Policy D1.

5.62 The proposal also seeks to minimise overlooking, improve privacy and enhance visual amenity for the neighbouring buildings, residents and hotel guests in line with CLP Policy A1 and Policy D3 of the London Plan.

5.63 The location and massing of the proposed new entrance is very similar to that approved in 2008 (ref. 2008/3325/P) for a new entrance to the St Giles House office building that later became part of the hotel. This has established a principle for a new entrance in this location. Plan extracts are provided below providing a comparison between the approved and proposed schemes.



Figure 11: Extract from 2008 Design and Access Statement showing approved office entrance



Figure 12: Extract from 2023 Design and Access Statement showing proposed hotel entrance

5.64 The above extracts show that the approved entrance is taller and thinner than the current proposals and incorporated more glazing.

5.65 The current proposal is lower than the approved entrance as less height is required to incorporate the entrance into the hotel compared to the office building; the entrance to the office building was also

trying to make a greater statement to the street frontage. The current scheme by having less glazing makes it more energy efficient as well as reducing any light spill. The current scheme also incorporates blue/green roofs that is another benefit of the scheme compared to that previously approved.

- 5.66 The current proposed entrance is wider than that previously as it now incorporates the area of the steps up to the hotel, whereas before the entrance was alongside these steps as it was only serving the adjacent office building.
- 5.67 Overall the design of the proposed entrance is entirely in keeping with the site and surroundings and holds a number of advantages over the scheme previously approved.
- 5.68 London Plan Policy D3 and CLP Policy G1 require development to optimise site capacity and Section 11 of the NPPF outlines the need for development to make effective use of land.
- 5.69 The proposals make the effective use of the land by infilling and building upon underused spaces to enhance the hotel's facilities, increase the hotel accommodation offer and creating a new accessible entrance. Therefore, the proposals make best use of the site in accordance with LP D3, CLP Policy G1 and Section 11 of the NPPF.
- 5.70 Policy C5 "Safety and Security" of the CLP seeks to make Camden a safer place and requires developments to demonstrate that they have incorporated design principles which contribute to community safety. Policy D11 "Safety, security and resilience to emergency" of the London Plan also outlines that developments should include measures to design out crime.
- 5.71 A Crime Impact Statement (CIS) has been completed by KABSEC to ensure the proposed security measures are sufficient. These will include appropriate lighting, CCTV, the use of fobs and key cards and concealable electronic counter-security devices. The CIS demonstrates that the development has incorporated design principles which improve safety, in accordance with Policy C5 of the CLP and D11 of the London Plan.
- 5.72 The proposals are design-led, in line with current national, regional and local planning policy objectives. They have been informed by a contextual analysis of the site and its surroundings in order to ensure they respond to and are compatible with the local character and protect the occupiers and neighbouring properties.
- 5.73 In light of the above, the proposal accords with Development Plan's policies relating to design, access and inclusivity.

Heritage

- 5.74 Section 16 of the NPPF, Policy D2 "Heritage" of the CLP and Policy HC1 "Heritage conservation and growth" of the London Plan outline the heritage and archaeological considerations for development. Development proposals which affect heritage assets should conserve their significance by ensuring the proposals are sympathetic to the asset's significance and demonstrate an appreciation of their surroundings. In addition, the Council will resist development outside of a conservation area that causes harm to the character or appearance of the area.
- 5.75 CPG 'Design' highlights that applicants will need to show how the significance of any heritage assets have been taken into consideration in the design of the proposed works.

- 5.76 The Site does not contain any designated or non-designated heritage assets. It lies adjacent to the Seven Dials Conservation Area boundary and also opposite the Grade II listed '186 and 187 Drury Lane'.
- 5.77 A Heritage Statement has been submitted with the application that provides an assessment of the application proposals on the significance of the identified heritage assets, based on national, regional and local policy and guidance.
- 5.78 The site is located adjacent to the Seven Dials Conservation Area with the boundary being the centre of Drury Lane. The site does sit within the setting of the conservation area, however, it is concluded that the building makes a neutral contribution to its significance as despite being a dramatically contrasting building it does have some positive elements such as the ground floor retail units.
- 5.79 The proposed reception extension would be visible from inside the conservation area at the northern end of Drury Lane in views up and down the street. As previously described, the proposed extension has been designed to integrate with the host building in both architectural design and materiality. Therefore, despite representing a slight increase in mass, the extension would continue the existing building line from the retail units and also have a more inviting presence on the streetscape than the existing concrete staircase. Overall, the proposals would preserve the character and appearance of the Seven Dials Conservation Area.
- 5.80 Drury Lane has two Grade II Listed Buildings 186 and 187 (Camden Ref. 798-1-346105). These buildings are five-storey terraced houses located opposite the Travelodge Hotel. The proposals would represent a minor change in the immediate setting of 186 and 187 Drury Lane and importantly would not affect the key aspects of their setting which is their position as part of a terrace along the northern side of Drury Lane and not impact on views of the asset up and down the street. The proposals would therefore preserve the significance of 186 and 187 Drury Lane.
- 5.81 The site is located within a designated Tier 1 Archaeological Priority Area (APA) but does not contain any Scheduled Monuments and will not have any impact on archaeology.

Sustainable Design and Construction

- 5.82 Section 15 of the NPPF, CLP Policies A1 "Managing the impact of development", CC1 "Climate change mitigation", CC2 "Adapting to climate change" and London Plan policies SI 2 "Minimising greenhouse gas emissions", SI 4 "managing heat risk" seek to improve sustainability and energy efficiency, conserve the environment and mitigate against climate change.
- 5.83 Camden's CPG 'Energy efficiency and adaption' outlines the expectation that all development in Camden will reduce CO2 emissions by following the energy hierarchy in accordance with Local Plan policy CC1.
- 5.84 The proposals incorporate a range of sustainability measures and seek to mitigate against the effects of climate change, in response to the above requirements of local, regional and national level planning policy.
- 5.85 Policy SI 2 of the London Plan requires major development to be net zero-carbon and provide a minimum on-site reduction of at least 35% beyond Building Regulations for major developments. Where development is unable to fully achieve the zero-carbon target, a shortfall should be provided such as a cash in lieu contribution to the borough's carbon offset fund.

- 5.86 An Energy Statement has been prepared and sets out the energy efficiency measures and energy related impacts of the development. The Statement also addresses how the development will achieve the different levels of the 'Be Lean', 'Be Clean' and 'Be Green' energy hierarchy detailed within the Local Plan and 'Energy efficiency and adaption' CPG.
- 5.87 The Energy Statement outlines that the total predicted CO2 emissions for the development have been reduced by the required 35% (6.9 Tonnes CO2 per annum) over the Baseline Building Regulations. The reduction in emissions has been maximised, leaving 13.1 tonnes CO2 per annum to achieve carbon neutrality.
- 5.88 The cash in-lieu contribution towards the carbon offset fund, based on the GLA recommended price of £95 per tonne of CO2, is calculated at £37,291 as set out in the Energy Report. This contribution will be provided to the borough's carbon offset fund and secured by S106 legal agreement.
- 5.89 A Sustainability Statement has also been prepared in support of the application and addresses the sustainability requirements as set out in Policy CC2 of the CLP and chapter 11 of the Camden 'Energy Efficiency and Adaption' CPG.
- 5.90 The Sustainability Statement concludes that due to the nature of the scheme being an extension, existing building constraints, site location and constraints of the applicable BREEAM scheme, the target of Excellent is deemed unachievable for the proposed development. Instead the development targets a BREEAM 'Very Good' rating alongside the significant reduction in on-site carbon.
- 5.91 Policy CC5 "Waste" of the CLP aims to reduce waste and ensures developments include facilities for the storage and collection of waste and recycling.
- 5.92 In accordance with Policy CC5, waste from construction activities will be minimised and the location of the refuse store will remain at the existing location. The refuse collection will also be in-keeping with the existing compliant arrangements.
- 5.93 CLP Policy A3 "Biodiversity" and London Plan Policy G5 "Urban greening" set out the goal to protect and contribute to the greening of London where possible. CPG 'Design' clarifies that green roofs are an option of urban greening and that green roofs can provide important landscape detail, biodiversity improvements, prevent local flooding and keep a building insulated.
- 5.94 The existing site is primarily covered by buildings or hard surfaces with minimal opportunities for soft landscaping/planting. However, the proposals will improve the biodiversity of the site and contribute to 'urban greening' by incorporating three new blue / green roofs above the proposed new lobby/reception extension and existing shops to the Drury Lane frontage in line with CLP Policy A3 and London Plan G5 and CPG 'Design'.
- 5.95 In light of the above, it is deemed the proposals are in accordance with the Development Plan's policy requirements and CPG regarding sustainable design and construction.

Transport

- 5.96 London Plan policies T1 "Strategic approach to transport" and T2 "Healthy streets" and CLP Policy T1 "Prioritising walking, cycling, and public transport" promote the prioritisation of walking, cycling and public transport to improve health and reduce the dominance of vehicles on London's Streets.

- 5.97 Section 9 of the NPPF promotes sustainable transport, with Paragraph 110 requiring developments to take appropriate opportunities to promote sustainable transport modes. Paragraph 111 confirms that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.98 Policy A1 “Managing the impact of development” of the CLP and T4 “Assessing and mitigating transport impacts” of the London Plan seek to manage the impact of development and require the submission of a Transport Assessment and Travel Plan. The Local Plan’s transport policies are supported by CPG ‘Transport’ which provides information on all types of detailed transport issues.
- 5.99 A Transport Assessment and Travel Plan has been submitted with the application and provides a detailed assessment of the transport arrangements and impacts in line with the advice set out within the CPG ‘Transport’ which includes comprehensive advice on Transport Statements and Travel Plans.
- 5.100 CLP Policy T2 “Parking and car free development” and Policy T6 “Car parking” of the London Plan sets out that car-free development should be the starting point for all development proposals in well-connected locations.
- 5.101 CLP Policy T2 and London Plan Policy T6.4 “Hotel and leisure uses parking” limits on-site parking to spaces designated for disabled persons or essential operational or servicing needs. T6.5 “Non residential disabled person parking” of the London Plan seeks all non-residential elements to provide access to at least one on or off-street disabled persons parking bay or 6% of total parking provision as designated bays and 4% as enlarged bays
- 5.102 The site is in a highly accessible area, very well connected on-foot and by bicycle, with excellent access to public transport achieving the highest PTAL rating of 6b. The development removes all of the existing car parking spaces, save for the re-provision of two disabled spaces which will be provided on the lower ground floor, in line with Policy T6.4 and T6.5 of the London Plan. Therefore, as noted within the Travel Plan, the lack of on-site parking opportunities will, in effect, eliminate the likelihood of car trips being made to/from the site promoting the use of sustainable transport as required by Section 9 of the NPPF, CLP Policy T1 and London Plan policies T1 and T2.
- 5.103 London Plan Policy T5 “Cycling” and the London Plan’s ‘Cycle Parking Standards’ requires the provision of a minimum of 3 long-stay and 2 short-stay spaces for the uplift of 55 bedrooms to the hotel.
- 5.104 In accordance with these policies, the proposals will accommodate 4 long-stay and 2 short-stay secure cycle spaces and will ensure access to all cycle parking on-site is step-free in line with the ‘London Cycling Design Standards’.
- 5.105 The Transport Assessment outlines that the proposed servicing and refuse collection arrangements will be largely consistent with the existing situation and concludes that the proposed development will have no noticeable impact on local conditions and will not affect local traffic flows, parking, or congestion levels. Therefore, the development will not have an unacceptable impact on highways and is acceptable on highways grounds in line with Paragraph 111 of the NPPF.
- 5.106 In light of the above, it is considered that the proposals are in accordance with the Development Plan’s policy requirements that aim to promote the use of car-free travel methods and increase the transport sustainability of developments.

Flood Risk and Drainage

- 5.107 Policy CC3 “Water and flooding” of the CLP and London Plan Policies SI 12 “Flood risk management” and SI 13 “Sustainable drainage” seek development proposals to ensure that flood and surface water risk is minimised and mitigated against. The Local Plan is supported by the CPG ‘Water and flooding’ which explains that major developments should submit a drainage report and meet London Plan run-off reduction targets.
- 5.108 The planning application is supported by a Level 1 Flood Risk Assessment (FRA) and Drainage Strategy Report as required by planning policies at local, regional and national levels.
- 5.109 The Report concludes that the development of the site has a Low risk of flooding from external sources and that the surface water drainage scheme which has been produced will capture roof and surface water run-off, ensuring there is no increased risk of flooding, either on or off site.
- 5.110 The proposed development will have a reduced impermeable footprint due to the addition of three blue/green roofs. The blue/green roofs will provide additional capacity for rainwater attenuation and additional storage capacity within the surface water system thereby delaying the arrival of run-off to the basement tanks.
- 5.111 The proposals seek to locate new development in an area at low risk from flooding and has produced a SuDS compliant surface water drainage scheme, in line with local, regional and national policy objectives, and should therefore be supported.

Fire Engineering

- 5.112 The planning application is supported by a Fire Strategy Report, prepared by Maze Fire Consulting.
- 5.113 The report outlines the minimum fire safety provisions required for the proposed development to be compliant with the Functional Requirements of the Building Regulations 2010 (as amended) using the guidance contained in Approved Document B (2019 with 2020 amendments) and associated British Standards.
- 5.114 The Statement concludes that the fire safety strategy satisfies the requirements of London Plan Policy D12 “Fire safety” and that the building has been designed to incorporate features which will mitigate the risk to life and the risk of serious injury in the event of a fire, including the provision of an evacuation lift.
- 5.115 In light of the above, the proposal is in accordance with London Plan Policy D12 regarding Fire Safety.

Noise

- 5.116 CLP Policy A4 “Noise and vibration” and London Plan Policy D14 “Noise” require that noise and vibration is controlled and managed.
- 5.117 The planning application is supported by a Plant Noise Assessment, prepared by Applied Acoustic Design having regard to proposed changes to mechanical services plant serving the hotel as listed in Tables 5 and 6 and shown in Appendix 1 of the assessment.
- 5.118 The result of the assessment is that the calculated levels of noise are such that the proposed plant can be expected to comply with Camden’s policy.

Air Quality

- 5.119 CLP Policy CC4 “Air quality” and LP Policy SI 1 “Improving air quality” ensures that the impact of development on air quality is mitigated and requires Air Quality Assessments for major developments.
- 5.120 LP Policy SD4 “The Central Activities Zone (CAZ)” of the London Plan also notes that due to the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible.
- 5.121 Camden’s CPG ‘Air Quality’ highlights that Camden is a designated Air Quality Management Area and requires developments to limit their impact on local air quality and be at least air quality neutral.
- 5.122 The planning application is supported by an Air Quality Assessment, prepared by Aval Consulting Group.
- 5.123 The construction phase is predicted to have a ‘Medium Risk’ of nuisance and/or loss of amenity impacts due to dust nuisance. However, the risk of dust nuisance can be mitigated by implementing the appropriate mitigation measures.
- 5.124 The development is not anticipated to generate a significant amount of additional road traffic during the operational phase and falls below the criteria proposed by the Institute of Air Quality Management (IAQM) to proceed to a detailed assessment. The AQA concluded the development is considered suitable for development with the implementation of an appropriate mechanical ventilation system.
- 5.125 It is therefore concluded that the proposed development is not considered to conflict with any national, regional, or local planning policy in relation to the development’s impact on air quality and should be supported.

Construction Management

- 5.126 The planning application is supported by a Construction Phase SHEQ Management Plan, prepared by Barnes Construction.
- 5.127 The development project to which the plan relates is within the scope of activities registered to ISO 9001: Quality Management System, ISO 14001: Environmental Management System and ISO 45001: Occupational Health and Safety Management Systems. The plan demonstrates compliance with the requirements of these standards and describes how the scheme will be constructed and managed having regard to site constraints and best practice. The proposed construction management is therefore deemed to be acceptable.
- 5.128 The majority of construction deliveries will be off High Holborn, with vehicle movements on Shorts Gardens to be minimised. This was a request of local residents during public consultation and has been incorporated within the Construction Phase SHEQ Management Plan.

Planning Obligations and CIL

- 5.129 The Community Infrastructure Levy (CIL) Regulations at Regulation 122 provide limitations on the use of planning obligations. Planning obligations may only be sought where they meet all of the following tests:
- *“necessary to make the development acceptable in planning terms;*

- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.”*

5.130 These tests are reinforced at Paragraph 57 of the NPPF. Furthermore, the NPPF recognises that any planning obligations must be fully justified and evidenced and should not prevent development going forward.

5.131 In addition to the planning benefits of the proposed scheme, it is anticipated that appropriate obligations will be negotiated and agreed with the Council in accordance with the above tests and the overall viability of the proposals.

5.132 Having regard to local and regional planning policy, it is anticipated that obligations may be required in relation to the following:

- Construction Management Plan
- Sustainability Plan
- The Energy Efficiency and Renewable Plan
- Local Employment and Procurement
- Service Management Plan
- Travel Plan
- Carbon off-setting

5.133 The development will also provide Community Infrastructure Levy (CIL) contributions to both Camden and the GLA, which will be used to fund local and regional infrastructure respectively.

5.134 The Mayor of London's MCIL 2 Charging Schedule was adopted April 2019. The site is located within the Central London area where the 2024 CIL rate is chargeable at £161.64 per sqm for hotel use.

5.135 The London Borough of Camden's CIL Charging Schedule was adopted October 2020. The application site is located within Zone A (Central) where CIL is chargeable at £116 per sqm for hotel use (2023 CIL rate).

5.136 CIL is to be calculated at the point planning permission is granted, in accordance with Schedule 1 of The Community Infrastructure Levy Regulations 2010 (as amended), taking account of the proposed and existing floorspace (GIA).

5.137 It is currently estimated that the CIL liability associated with the proposed development will be approximately £285,000 for the additional 1,017sqm GIA proposed.

5.138 The required CIL Further Information Form has been submitted as part of the planning application.

6 Summary and Conclusions

6.1 This Planning Statement has been prepared by Smith Jenkins Ltd on behalf of Travelodge Hotels Ltd and Falkerstone Ltd in support of a full planning application at Travelodge Covent Garden, Drury Lane, London, W2CB 5RE for:

“Erection of two storey extension forming new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of undercroft at level 3 and new flat roof link to extend existing hotel bar/restaurant”

6.2 The proposals seek to maximise the opportunity of the site, ensuring an efficient and effective use of previously developed land, in line with current national, regional and local policy objectives.

6.3 The proposals are entirely appropriate to and complement the existing hotel use in a highly accessible location, and will support the functions of the Central Activities Zone and Central London Area.

6.4 The proposals represent sustainable development, will make the best use of underutilised areas of the site, will considerably improve the accessibility of the hotel, will remove car parking from Central London, will improve the quality of facilities for hotel guests as well as contributing to hotel provision generally within the area.

6.5 Some of the benefits of the proposed development can be summarised as follows:

- The proposed hotel bedrooms will assist in meeting local needs for visitor accommodation, including the provision of wheelchair accessible accommodation and access.
- Construction of new accessible entrance and extended reception, bar and restaurant facilities supporting the hotel and being inclusive to all.
- Reducing car parking on site and encouraging the use of sustainable transport methods.
- Low and zero carbon energy sources, combined with sustainable construction and building management methods, will ensure significant carbon reductions on site.
- Three new blue/green roof providing improvements to biodiversity as well as providing attenuation for rainwater.
- The development will be air quality neutral.
- Contributions will be made to Camden's carbon offsetting fund and Mayoral and Camden CIL payments will be made to fund infrastructure.

6.6 This Statement demonstrates that the development proposals accord with the Development Plan and is acceptable in regard of all other material planning considerations. Therefore, in accordance with Paragraph 11 of the NPPF, the proposals should be approved without delay.