
Planning Statement

Garth Hotel, 69 Gower Street, London, WC1E 6HJ

Prepared by Savills (UK) Limited

Garth Hotel Limited

March 2024



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1. Introduction

1.1. This Planning Statement (“the / this statement”) has been prepared by Savills (UK) Limited (“Savills Planning”) on behalf of the applicant, Garth Hotel Limited (“the Applicant”), as part of a planning and listed building consent application for proposed development at the Garth Hotel, 69 Gower Street, London, WC1E 6HJ (“the Site”). The application proposes the reconfiguration of the internal spaces of the Hotel to improve the existing condition and a one storey ground floor extension.

1.2. The site is located on the west side of Gower Street within the planning jurisdiction of the London Borough of Camden (LBC). A site location plan showing the site in the context of the surrounding area is submitted as part of this application.

Description of Development

1.3. This application proposes the following description of development:

“Internal refurbishment and erection of a single storey ground floor extension.”

1.4. Further details of the application are provided in Section 3 of this Statement and on the drawings and Design and Access Statement submitted as part of this application.

Supporting Information

1.5. This Planning Statement sets out the application proposals and relates them to national, regional (London) and local planning policies. This Statement should be read in conjunction with the drawings, Design and Access Statement, as well as the supporting documents. The documents submitted for approval are:

- **Planning Application Drawings**, prepared by Studio Moren listed in the Planning Drawing Issue Sheet, issued 26 March 2024;

1.6. The documents submitted to explain and justify the development comprises:

- **Design and Access Statement (DAS)**, dated March 2024, prepared by Studio Moren;
- **Planning Statement**, dated March 2024 prepared by Savills (this document);
- **Heritage Statement**, dated March 2024, prepared by Savills; and
- **Arboricultural Impact Assessment**, dated 2024, prepared by GHA Trees Arboricultural Consultancy.

- 1.7. In addition to the above, a completed **Application Form/Ownership Certificate, Community Infrastructure Levy (CIL) Additional Questions Form**, and **covering letter** (prepared by Savills) have also been supplied. The application fee has also been provided under separate cover.

Structure of this Planning Statement

- 1.8. The structure of this Planning Statement is set out as follows:
- **Section 2 (Context of the Proposals)** provides background to the proposal, including a description of the site and surrounding area and planning history of the site;
 - **Section 3 (Pre-Application Consultation)** sets out the initial site and design approach and the details of the consultation programme;
 - **Section 4 (The Proposed Development)** sets out details of the development proposal;
 - **Section 5 (Planning Policy Framework)** sets out the relevant planning policy framework that the proposal is considered to be considered against;
 - **Section 6 (Planning Assessment)** sets out the discussion of the material planning considerations arising from the application proposals;
 - **Section 7 (Conclusions)** presents our conclusions.

2. Context of the Proposal

- 2.1. This section provides details of the background to the application proposals and provides the context within which the application is being made.

The Site and Surrounding Context

- 2.2. The site is located on Gower Street to the south of Torrington Place. The site consist of a terrace house and its rear garden. The site was built by the Bedford Estate as part of a row of 18 houses in 1786-7. The house has been in use as a Hotel/ Boarding House since the late 19th Century (Use Class C1). A site location plan showing the site in the context of the surrounding area is submitted as part of this pre-application request and shown at **Figure 2.1** below.

Figure 2.1: Site Location Plan (Source: Studio Moren)



- 2.3. The Hotel is arranged over lower ground floor, ground floor and three upper floors. The Hotel currently has a total of 16 letting bedrooms all of which are provided with en-suite shower rooms. The site is of a darkened yellow London stock brick construction surmounted by a mansard slate covered roof. The lower ground floor has a painted rendered elevation with stucco band at ground floor and first floor sills. Windows to the front and rear are timber framed single glazed original sash style units with internal secondary glazing to the rooms to the front of the Hotel. To the top floor there are slate clad dormers with timber framed single glazed windows.

Local Heritage

- 2.4. The site is located in Sub Area 5 of the Bloomsbury Conservation Area. The entire terrace, Nos. 41-85 Gower Street, constitutes a Grade II listed building, first listed in March 1969. The site is designated with the Central London Area and Fitzrovia Area Action Plan as defined by Camden's Planning Policy Map (August 2021).

Trees

- 2.5. There are six trees located at the rear of the site, including 2 Category B trees and 4 Category C trees.

Access

- 2.6. The online PTAL calculator identifies that the site achieves a PTAL rating of 6b (best). Goodge Street which is served by the Northern Line, is located approximately 0.2km to the south west. Euston Square Underground Station is located approximately 0.3km to the north of the site providing access to the Circle, Hammersmith and City and Metropolitan Line. Euston Station is located approximately 0.6km to the north providing access to national rail services. The site is also located approximately 1.6km from Kings Cross providing national and international rail services. There are also a number of existing bus stops within the vicinity of the site.

Flood Risk

- 2.7. The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 1, which is defined as land that has less than 1 in 1,000 annual probability of river or sea flooding.

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Planning History

- 2.8. A desk-top based search has been undertaken with regards to the planning history for the site. A summary of the relevant planning history for the site can be found in Table 1 below.

Table 2.1: Key Planning History for the site

Application Reference	Description of Development	Decision and Date
2022/2062/T	Rear Garden: 1 x Bay (Laurus Nobilis) (T222) - Lift low canopy to approx. 4m to provide clearance over gardens. Prune from adjacent structure to clear buildings by 1m.	No Objection to Works to Tree(s) in CA 29/06/2022
2020/0055/T	Rear Garden: 1 x Bay – Fell to ground level.	No Objection to Works to Tree(s) in CA 05/02/2020
CTP/N13/5/4/HB1034	Internal alterations including the insertion of a lobby in the ground floor front room required in connection with means of escape in case of fire.	Refused 5 April 1976

3. Pre-Application Consultation

3.1. The application follows the submission of a pre-application request (reference 2023/4346/PRE). A pre-application meeting and site visit was held on 18 December 2023 and feedback was received from Planning Officer Sam FitzPatrick on 6 February 2024. The advice received is set out at Table 3.1 below. Where applicable an explanation of how the issues have been addressed is given.

Table 3.1: Pre-Application Feedback and Responses

Topic	LBC Pre-Application Comment	Response
Design	The proposed rear extension to the building is not opposed in principle, though would need to be justified and explained in greater detail.	The proposed width has been reduced to the north, allowing access to the existing light-well.
	It would be worth considering whether the scale and massing of the extension could be reduced (or at least redistributed) so that it is not full width.	An alternative glazing style has been considered and designed to compliment the building's architectural features better.
	It could also be explored whether an alternative glazing style might be more appropriate and whether this could reflect the existing composition and building's architectural features better.	
	Details of the physical changes to the garden walls and the garden would need to be clearly outlined.	The proposed single storey extension is proposed to adjoin the southern garden wall, creating better weathering detail and ease long term management issues. The wall will be reconstructed as part of this application.
	A single storey rear extension would provide a good opportunity to include a green roof, which would soften the visual impact of a rear extension, as well as improve biodiversity and potentially contribute to sustainable urban drainage.	A green roof has been incorporated in the application proposals.
	The rear closet wing extension would not be supported.	The proposed single storey extension on the third floor has been omitted from the proposal.
	The changes to increase the width and alter the glazing patter of the dormer window would not be supported and should be removed.	Noted. Widening of the front dormer windows is no longer proposed, with this fenestration to be retained as existing and repaired instead.

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	It would be encouraged for the front room and ground level to be returned to a single space, rather than remain subdivided.	The front room at ground level has been returned to a single space on the proposed layout.
	All architectural features that remain should be preserved (such as the remains of the fireplace/breast in the basement, fire surrounds, cornicing, etc).	Noted.
Amenity	The proposed rear extension would potentially create some opportunities for overlooking. Similarly, the extent of glazing, particularly facing towards the rear elevation of the terrace of houses, could result in light spill that may have the potential to impact on residential amenity.	The glazing has been reduced and the light well has been omitted. The northerly side window has restricted outlook due to the boundary wall. The application proposal has been designed to create an open atmosphere, whilst respecting privacy and minimising overlooking.
Trees	Any future application would need to be accompanied by an Arboricultural assessment that justifies any tree removal and gives adequate tree protection details.	An Arboricultural Impact Assessment prepared by GHA Trees Arboricultural Consultant and is submitted with this planning application.

4. The Proposed Development

- 4.1. This section sets out a summary of the key elements of the proposals. A comprehensive description of the detailed design is set out in the accompanying drawings and the DAS, prepared by Studio Moren.
- 4.2. The application proposes a one storey ground floor extension to the rear to provide additional front of house facilities to support the long term use of the hotel. The extension will be constructed with stock brick to match the garden walls and the existing building, while a contemporary style of fenestration and a 'glazed link' connection will show a clear separation from the original building.
- 4.3. The intention is for the rear extension to 'sit against' the existing rear façade of the listed building, using the existing rear door for access and therefore requiring only minimal fabric impact to affix the new structure to the rear façade. The modest height of the extension will sit just above the height of the existing garden walls. The proposed green roof will soften the extensions visual impact. The proposed extension is illustrated at Figures 4.1 and 4.2 below.

Figure 4.1: Proposed Extension

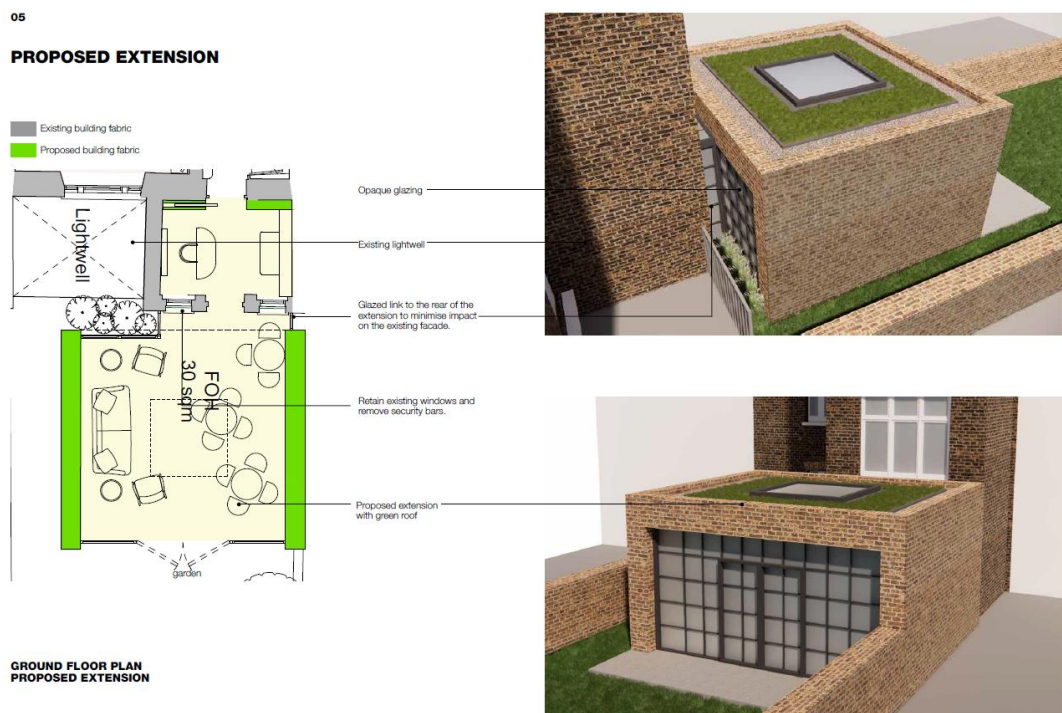


Figure 4.2: Proposed Extension View 01



- 4.4. The proposed extension will retain the existing windows and lightwell and remove the security windows. The application proposes to retain the existing dormers and repair, clean and make good of the existing windows.
- 4.5. Internally, the majority of the proposed demolitions are to bathrooms and partitions. On the basement, first, second and third floors, it is proposed to demolish parts of the spine wall separating what were formerly the front and rear rooms. The partitions, bathrooms and fitted wardrobes proposed to be inserted will be in keeping with the hotel use of the building.

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- 4.6. The design has sought to keep loss of existing fabric to a minimum, whilst reinstatement of the ground-floor front room as a single space provides a considerable heritage benefit here. This will be achieved through removal of the partition that currently cuts across one of the windows, and will return this part of the building to its original form of a single front room with the double bay of windows fully legible within this space.
- 4.7. The historic features throughout the listed building will be retained and restored where possible, including the existing entrance hallway. The single remaining fireplace will also be retained in situ. The surviving large kitchen fireplace at lower ground floor level will also be retained as part of the proposals, forming a key feature of this new hotel room.
- 4.8. Three of the four remaining ceiling roses will be kept and restored, with only the one at ground floor needed to be removed and replaced with a complete replica. This single ceiling rose is proposed to be removed due to its incomplete condition, having already been cut into by a modern partition.
- 4.9. Table 4.1 below illustrates the existing and proposed Hotel accommodation schedule.

Table 4.1: Existing and Proposed Hotel Accommodation Schedule

Existing		Proposed	
Floor	Number of Rooms	Floor	Number of Rooms
Basement	1	Basement	4
Ground Floor	4	Ground Floor	2
1 st Floor	4	1 st Floor	4
2 nd Floor	4	2 nd Floor	4
3 rd Floor	3	3 rd Floor	3
Total	16	Total	17

5. Planning Policy Framework

- 5.1. The redevelopment proposals have taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a summary of the relevant planning policy documents and the following section demonstrates compliance with these policies.
- 5.2. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 5.3. The development plan comprises:
- The London Plan 2021;
 - Camden Local Plan (adopted July 2017); and
 - Fitzrovia Area Action Plan (FAAP) (March 2014).
- 5.4. The development plan is supported by other material considerations including:
- National Planning Policy Framework (NPPF), December 2023;
 - Planning Practice Guidance (PPG) to support the NPPF;
 - London Plan guidance: Various Supplementary Planning Guidance (SPG), London Plan Guidance (LPG), and Practice notes;
 - Camden's guidance: Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011); and
 - Camden's draft Local Plan (this noted further below).

National Planning Policy Framework

- 5.5. At the national level, the Government published its revised National Planning Policy Framework (NPPF) in December 2023. The NPPF provides an overarching framework for the production of local policy documents and at the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10).
- 5.6. For decision-taking, Paragraph 11 sets out that, in the context of the presumption in favour of sustainable development, 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.*

5.7. The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, while protecting and enhancing the natural and historic environment.

5.8. The Government has published Planning Practice Guidance (PPG) to support the NPPF, providing further guidance on specific planning issues and processes.

The London Plan

5.9. The London Plan (2021) is the overall strategic plan for Greater London, and sets out the Mayor of London's overall strategic plan for London. Relevant London Plan policies are referenced in this assessment where appropriate.

Local Planning Policy

5.10. The Camden Local Plan, adopted July 2017 sets out the main policies and overarching themes which guide development. The Fitzrovia Area Action Plan aims to ensure that development proposals bring real benefits to the area, particularly in terms of public open space and other public spaces, housing, affordable homes, community facilities and locally produced energy. It seeks to support sustainable growth of a realistic level and secure the most efficient and effective use of land while maintaining what makes the area attractive as a place to live, work and visit.

5.11. The Bloomsbury Conservation Area and Management Strategy defines the special interest of the Conservation Area in order that its key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement.

Emerging Local Plan

- 5.12. Camden is in the process of preparing a New Local Plan. The new Local Plan will replace the current Camden Local Plan (2017) and Site Allocations Plan (2013). The Council has recently consulted (January – March 2024) on the draft New Camden Local Plan (Regulation 18) Consultation Version. It is anticipated that Regulation 19 will take place Winter 2024/25,
- 5.13. Paragraph 48 of the NPPF states that Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the more advanced its preparation, the greater the weight that may be given.
- 5.14. Given the early stage of the emerging Local Plan, it is considered that limited weight should be afforded to its provisions.

6. Planning Assessment

- 6.1. This section assesses the proposals against the national, regional and local planning policy framework and sets out the main planning issues.

Principle of Development

- 6.2. Paragraph 85 of the NPPF states that planning 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. Paragraph 87 of the NPPF states that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
- 6.3. London Plan Policy E10 (Visitor Infrastructure) requires a sufficient supply and range of served accommodation to be maintained. Visitor numbers to London are expected to continue to increase, creating more demand for more Hotels and other overnight accommodation, particularly in central London. The London Plan sets a target of achieving 58,000 net additional bedrooms of served accommodation by 2041, which is an average of 2,230 bedrooms per annum.
- 6.4. Local Plan Policy G1 (Delivery and Location of Growth) promotes making the most efficient use of land and building by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 6.5. Local Plan Policy E3 (Tourism) states that the Council expect visitor accommodation to be located in Central London, particularly the growth areas of Euston and King's Cross. All visitor accommodation must be easily reached by public transport, not harm the balance and mix of uses in the area, local character, residential amenity services for the local community and the environment or transport systems.
- 6.6. Principle 8 of the Fitzrovia Area Action Plan (FAAP) states that the Council will guide development of large scale visitor accommodation to the Tottenham Court Road and Euston Growth Areas and the Central London Frontage on Tottenham Court Road and New Oxford Street.
- 6.7. Draft Local Plan Policy IE5 (Hotels and Visitor Accommodation) the Council recognises the

importance of the visitor economy in Camden and supports additional hotel and visitor accommodation.

- 6.8. The existing Hotel accommodation is in a fair state of repair and condition given its age and usage. The proposed alterations will provide 25 sqm (GIA) of additional Hotel floor space, comprising the reconfigurations of 16 existing guestrooms and the provision of one additional Hotel room. There are Hotels and other visitor accommodation concentrated along Gower Street and the surrounding area. The site is easily accessible by public transport and is located approximately 0.2km from the nearest tube station, Goodge Street. Local Plan Policy E3 and London Plan Policy E10 recognise the importance of the visitor economy in Camden and support proposals for additional visitor accommodation, particularly in areas easily reached by public transport.
- 6.9. The application seeks to rejuvenate the underused space to enhance and extend the Hotel accommodation provision. The proposed development will allow the Hotel to invest, expand and adapt and provide the Hotel with an opportunity to enhance its economic growth and productivity in accordance with NPPF paragraph 85 and 87. In addition, the provision of one additional Hotel rooms will contribute to the London Plan target of 2,230 rooms per annum.
- 6.10. The principle redevelopment of the Hotel is considered to be in accordance with National, Regional and Local Planning Policies.

Design

- 6.11. Section 12 of the NPPF promotes the creation of high-quality buildings and places stating that good design is a key aspect of sustainable development (Paragraph 131). Paragraph 135 of the NPPF sets out criteria for good design including adding to the overall long-term quality of the area; visually attractive architecture and landscape design; sympathetic to local character creating a sense of place and optimising a site's potential.
- 6.12. At the local level, Local Plan Policy D1 (Design) the Council will seek to secure high quality design in development. The Council requires that development respects local context and character, preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage) and comprises details and materials that are of high quality and complement the local character.
- 6.13. The FAAP requires new development to respond positively to the prevailing form of nearby buildings and frontage in terms of scale and grain, particularly listed buildings and buildings

that contribute to the conservation area.

- 6.14. Draft Local Plan Policy D1 (Achieving Design Excellence) requires all development in Camden to achieve excellence in the architecture and design of buildings. The Council requires that development responds positively and sensitively to local context through layout, orientation, scale, height, bulk massing, proportion, appearance and the use of high quality, durable and sustainable materials.
- 6.15. To the front elevation the application proposes the repair, clean and make good of the existing windows. The existing dormers will be retained. To the rear elevation, the application proposes the installation of opaque windows to the bathrooms.



Front elevation

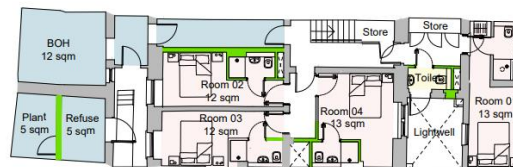
- 6.16. Externally the building retains many features that can be restored and enhanced, this is particularly true of the Gower Street frontage. The application proposes to retain the original front iron railings along the terrace row. The architectural interest of the building is primarily derived from its external appearance, particularly in relation to the front façade. The interior has been altered over the last century to accommodate the Hotel use.
- 6.17. The Hotel currently has limited public area. The entrance to the Hotel leads via an outer lobby through twin folding doors into an inner hallway with stairs to the rear, providing access to the lower ground floor and upper floors. To the lower ground floor/basement is a rudimentary reception area to the rear and a breakfast room to the front, albeit this is no longer in use. It provides seating for around 20 people.

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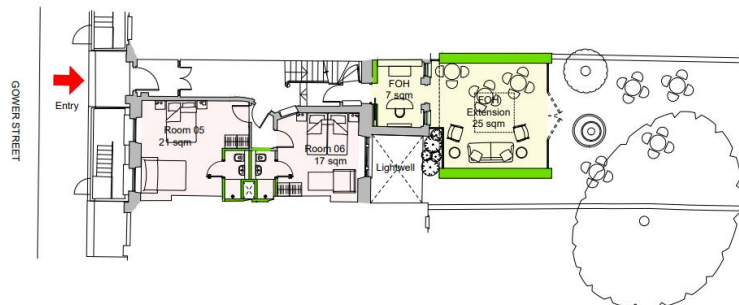


- 6.18. The reconfiguration of the lower ground floor converts the breakfast room and pantry into the provision of additional bedrooms. The extension to the ground floor will provide an enhanced front of house space with an additional seating area.



Proposed lower ground floor

- 6.19. The application proposes a single storey ground floor extension to the rear elevation to provide an additional front of house area. The proposed massing will remain sympathetic to the proportions and layout of the existing elevations. The extension is not full width and is limited in its projection into the rear garden, and as such is considered to be a proportionate extension to the property.



Proposed ground floor

- 6.20. The ground level external proposal has been designed in a contemporary style to aid the reading of historic fabric to new. Additionally this extension is proposed to lightly touch the existing fabric with a glazed link, retaining the existing historic wall, windows and door as access to the new part. The extension is to be in brick with glazing incorporating glazing bar details that provide a contemporary appearance in a respectful way to the historic façade of the existing building.

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Proposed rear elevation

- 6.21. The ground level extension will not be visible from the wider conservation area due to the high boundary walls and mature vegetation that exists, as can be seen in the photograph below.



- 6.22. The application has been designed to preserve the character and appearance of the surrounding conservation area and maintain the setting of nearby listed buildings.

Heritage

- 6.23. The NPPF, Regional and Local Planning and Legislation (Planning (Listed Buildings and Conservation Areas) Act 1990) all place significant weight and a statutory duty on the protection and enhancement of the historic environment.
- 6.24. London Plan Policy HC1 (Heritage Conservation and Growth) requires development

proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 6.25. Local Plan Policy D2 (Heritage) the Council will preserve and, where appropriate enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposals convincingly outweigh the harm.
- 6.26. Draft Local Plan Policy D5 (Heritage) the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 6.27. This application is supported by a Heritage Assessment prepared by Savills, which has assessed the proposals and their impact on the significance and setting of the listed building, as well as the wider conservation area.
- 6.28. The Heritage Statement concludes that the single-storey rear extension with glazed link is considered to result in no adverse impact to the listed building. This is due to its sympathetic massing and use of materials such as matching brick, with contemporary fenestration offering an appropriate contrast with the original building; the lightweight glazed connection allowing the form and integrity of the historic structure to remain entirely legible and dominant; and the proposed green roof softening its visual impact.
- 6.29. Internally the proposals will provide a benefit to the listed building through retaining and restoring key original features, removing non-original partitions to the ground floor front room (restoring this space) and improving the hotel's accommodation so as to ensure its long-term future. This has been achieved through minimising loss of original fabric, with primarily non-original partitions affected.
- 6.30. The proposals have been carefully considered to minimise loss of historic fabric and character and celebrate the building's key features, whilst offering considerable heritage benefits and securing the long-term viable use of the hotel. The proposals are therefore considered to result in no harm to the Grade II building.

- 6.31. The general refurbishment of the listed building, including the repair and repainting of sash windows, is also included in the proposals, improving its overall appearance from Gower Street as part of the terrace and providing a heritage benefit to the wider conservation area.
- 6.32. There are less important views of the rear of the terrace from Ridgmount Gardens. These views are restricted and glimpsed through trees. The single-storey extension will be low enough to be inconspicuous beyond the garden walls of the property, and has been designed to be sympathetic to the listed building as described above.
- 6.33. Overall the proposals are considered to be sensitively designed and will therefore result in no harm to the Bloomsbury Conservation Area.
- 6.34. The proposal is considered to be in accordance with the NPPF, Regional and Local Planning Policy and Legislation.

Neighbouring Amenity

- 6.35. Local Plan Policy A1 (Managing the Impact of Development) states that the Council will seek to protect the quality of life of occupiers and neighbours. Some of the factors the Council will consider include, visual privacy, outlook, sunlight, daylight and overshadowing. The properties either side are in hotel use. To the rear, in Ridgmount Garden, there are residential mansion blocks.
- 6.36. Draft Local Plan Policy A1 (Protecting Amenity) the Council will seek to protect the quality of life of future and existing occupiers and neighbours in Camden. When assessing planning applications, the Council will consider but not limited to privacy, overlooking and outlook.
- 6.37. The Mayor's SPG states that there must be between 18 and 21 metres between habitable rooms. The nearest neighbouring properties to the rear of the site are the properties located on Ridgmount Garden located approximately 30 metres to the west. Having regard to this, from the proposed rear extension, there would be no opportunities for overlooking into neighbouring properties and therefore no adverse loss of privacy.
- 6.38. In acknowledgement of the pre-application response, the glazing has been reduced and the light well has been omitted. The northerly side window has restricted outlook due to the boundary wall. The application proposal has been designed to create an open atmosphere, whilst respecting privacy and minimising overlooking. Although overlooking between hotel bedrooms is not considered to be an amenity issue due to the transient nature of occupiers,

the rear glazing in the proposed extension facing the back of the building is proposed to be opaquely glazed. This means that there will not be any overlooking between the front of house facility and the bedrooms looking out into the lightwell.

- 6.39. In consideration of the distance to neighbouring properties, the proposed windows and the height and scale of the proposed extension, there would be no adverse sense of enclosure or overlooking or any perceived sense of overbearing. There will be no loss of light to the residential properties in Ridgmount Gardens. The application therefore conforms with Local Plan Policy A1 and draft Local Plan Policy A1.

Trees

- 6.40. Local Plan Policy A3 (Biodiversity) the Council will protect, and seek to secure additional, trees and vegetation. The loss of trees will be resisted and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation.
- 6.41. The proposals will require the removal of one bay tree (T1). The tree is not protected by a tree preservation order and consent was previously granted for its removal (application reference 2020/0055/T) dated 5 February 2020. No objections were received for the removal of the tree.
- 6.42. Tree T1 is 3.5 metres from the nearest part of the building and as such its crown is touching the building. The crown has been pruned heavily to the north in the past as it has also caused issues for the property to the north. The crown dominates both nearby properties making the gardens unusable due to shade as well as incessant bird droppings on the patio area. In addition, the root are causing damage to the patio area and the stem touches the boundary wall and will likely lead to damage if left unmanaged. Photographs of T1 are included in the accompanying Arboricultural Impact Assessment prepared by GHA Trees Arboricultural Consultancy.
- 6.43. The application also proposes the removal of some small trees/ shrubs (T4/ G6) to the rear of the property. T4 and G6 are small Category C trees of little value in the local landscape and their removal is desirable to improve the garden space to the rear.
- 6.44. The application does not lead to the requirement to prune any of the retained trees or shrubs. The remaining trees on the site can be suitably protected from harm during the development.
- 6.45. The application requires the removal of one bay tree and some small trees and shrubs to the

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rear. Subject to precautionary measures outlined in the Arboricultural Impact Assessment the application will not be injurious to the retained trees. The application has therefore been considered in accordance with Local Plan Policy A3.

7. Conclusions

- 7.1. This Planning Statement has been prepared in support of a full planning application, submitted to the London Borough of Camden, on behalf of the Applicant (Garth Hotel Limited) for the site at 69 Gower Street, London, WC1E 6HJ.
- 7.2. The existing Hotel accommodation is in a fair state of repair and condition given its age and usage. The proposed alterations will provide 25 sqm (GIA) of additional Hotel floor space, comprising the reconfigurations of 16 existing guestrooms and the provision of one additional Hotel room.
- 7.3. The application seeks to rejuvenate the underused space to enhance and extend the Hotel accommodation provision. The proposed development will allow the Hotel to invest, expand and adapt and provide the Hotel with an opportunity to enhance its economic growth and productivity in accordance with national, regional and local planning policy.
- 7.4. The Applicant and Design Team have carefully designed and developed the proposed heritage-led application, preserving the character and appearance of the building and the surrounding conservation area. The application is considered to result in no harm to the significance of either 69 Gower Street or the Bloomsbury Conservation Area, and will provide considerable heritage benefits to both assets, as well as securing the long-term viable use of the listed building as a hotel. There will be no adverse impacts on neighbouring occupiers.
- 7.5. NPPF paragraph 11 requires that development which accords with the Development Plan be approved without delay. It is clear that the development does accord with the Development Plan and, therefore, given the need which it will address, it should be approved without delay.