

12th September 2024

The Savills logo consists of the word "savills" in a lowercase, red, sans-serif font, positioned on a bright yellow rectangular background.

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Dear Sir/ Madam,

GARTH HOTEL, 69 GOWER STREET, LONDON, WC1E 6HJ
FULL PLANNING APPLICATION AND LISTED BUILDING CONSENT SUBMISSION – PLANNING PORTAL
REFENECE PP- 13330031

We write on behalf of the applicant, Garth Hotel Limited (“the Applicant”), to submit 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 full replacement of the building’s mechanical, electrical and plumbing (MEP) services installation, to include: heating and cooling apparatus, replacement of soil pipes and re-routing of services ductwork.

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.

Prior to the submission of this application, on the 27th June 2024 planning permission and listed building consent were granted for a single storey rear extension and general refurbishment of the property, under Camden planning references 2024/1264/P and 2024/1614/L.

This application includes proposals for full replacement of the building’s mechanical, electrical and plumbing (MEP) services installation, to include: heating and cooling apparatus, replacement of soil pipes and re-routing of services ductwork.

The application has been carefully considered to seek a balance between the energy efficiency and the need to conserve the fabric of the building. A range of ‘fabric first’ measures, such as improvement of loft insulation and replacement of secondary glazing will also be undertaken in conjunction with the MEP installation to improve the thermal performance of the building envelope (as recommended in Camden Planning Guidance on Energy efficiency and adaptation dated January 2021).

Application Documents

The documents submitted for approval are:

- **Planning Application Drawings**, prepared by Introba;
- **Planning Cover Letter**, dated September 2024, prepared by Savills Planning (this document);
- **Heritage Statement**, dated September 2024, prepared by Savills Heritage; and

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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- **Noise Impact Assessment**, dated September 2024, prepared by Hann Tucker.

In addition to the above, a completed **Application Form / Ownership Certificate, Community Infrastructure Levy (CIL) Additional Questions Form**, and a **Covering Letter** i.e. this letter – prepared by Savills Planning have also been supplied.

The **Application Fee** has also been provided under separate cover.

All necessary information in which to validate the planning application are listed above.

Site and Surroundings

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

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.

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).

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.

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.

Planning History

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
2024/1264/P	Erection of a single storey rear extension and general refurbishment of the property.	Approved 27/06/2024
2024/1614/L	Erection of a single storey rear extension and general refurbishment of the property including internal alterations to reconfigure the hotel.	Approved 27/06/2024
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

Proposed Development

The proposals comprise:

- Removal of external soil pipes and re-routing of pipework in service risers;
- Full replacement of electrical installation;
- Replacement of existing gas-fired heating and domestic hot water systems with air source heat pump (ASHP) heating and cooling system;
- Removal of accumulated earth spoil pile and construction of acoustic screen enclosure to house of heat exchanger plant in rear garden.
- Installation of cold water, domestic hot water supplies and waste pipework to serve new bathrooms;

- Installation of centralised extract ventilation plant and re-routing of ventilation ductwork through service risers; and
- Removal of water tanks in loft, and replacement with tanks at lower ground floor.

Planning Policy Framework

The application 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.

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.

The development plan comprises:

- The London Plan 2021;
- Camden Local Plan (adopted July 2017); and
- Fitzrovia Area Action Plan (FAAP) (March 2014).

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).

Emerging Local Plan

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 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,

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.

Given the early stage of the emerging Local Plan, it is considered that limited weight should be afforded to its provisions.

Planning Assessment

Principle of Development

London Plan Policy GG6 (Increasing Efficiency and Resilience) establishes four broad objectives which those involved in planning and development should adhere to in order to make London more efficient and resilient overall. These encompass improving energy efficiency, ensuring infrastructure like buildings are adapted to climate change risks, creating environments that are safe and secure in the face of emergencies.

Local Plan Policy CC1 (Climate Change) mitigation establishes expectations for minimising greenhouse gas emissions from development across Camden to mitigate contribution to climate change. The Policy seeks to promote zero carbon buildings requiring demonstration from all development as to how energy hierarchy principles for maximising efficiency have been embedded in line with London Plan carbon targets. There is an expectation for developments to incorporate resource efficiency across circular economy principles.

Camden Planning Guidance Energy Efficiency and Adaption (January 2021) encourages the replacement of old boilers (paragraph 8.13). Camden's existing buildings account for almost 90% of the Borough's carbon dioxide emissions. The Council encourages buildings being refurbished to reduce their carbon emissions by making improvements to the existing building.

Prior to the submission of this application, on the 27th June 2024 planning permission and listed building consent were granted for a single storey rear extension and general refurbishment of the property, under Camden Council's planning references 2024/1264/P and 2024/1614/L. As part of the refurbishments, this application includes proposals for full replacement of the building's mechanical, electrical and plumbing (MEP) services installation, to include: heating and cooling apparatus, replacement of soil pipes and re-routing of services ductwork.

The existing gas boilers providing heating and hot water are beyond their design life. The existing ventilation to the hotel rooms is poor and where present, existing mechanical ventilation fans are beyond their design life and no longer efficient. New mechanical extract ventilation will be provided to each guest room, incorporating EC fan technology and improved controls to drive efficiency and improve internal fabric and comfort conditions.

As a result of the proposed works, the Garth Hotel will gain an MEP installation that will offer a more sustainable and energy efficient operational system that will meet what is increasingly becoming the minimum standard expected by hotel guests, and which will allow for improved comfort in a changing climate. The switch from gas to the more sustainable electrical heating and cooling system offers climate change benefits. Meanwhile, the significance of the building, primarily deriving from the uniformity of the front façade, windows and front door, will be entirely preserved, and the future use and utility of the building will be secured.

In consideration of the above, the proposals are in accordance with London Plan Policy GG6, Local Plan Policy CC1 and Camden's Energy Efficiency and Adaption Planning Guidance.

Design

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.

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.

The unit would not be of excessive dimension with an appropriate measurement of 940x1615x440mm. The heat pump condensers will be located in the garden to provide adequate distance from the main building for airflow and acoustic reasons. A build of soil spoil in the rear garden will be excavated to create the space for the external installation. Refrigerant will be routed to the domestic hot water tanks dropping down to lower ground floor level in the rear light well and through the bedrooms on that floor to the hot water tanks located in the pavement vault and to bedrooms via the service risers.

The system proposed has been chosen and positioned to be as inconspicuous as possible from both a visual and acoustic perspective. The setting of the listed building contributes to its significance where it is experienced alongside the rest of the terrace, where its architectural intention is apparent, and this mostly derives from the setting as experienced from the street. The rear garden is a secondary part of the setting, and the minor impact of the proposals on this setting will not limit any experience of the significance of the building. This proposal is therefore considered to cause no harm.

Given the position and configuration of the site and its neighbours, the proposed units will not be visible from private views. The proposed units are not considered to result in development that is harmful to the appearance of the host building given the discrete positioning.

The proposals have been designed in accordance with policy and should therefore be considered acceptable. The historic considerations of the proposal are discussed further below.

Heritage

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.

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.

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.

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.

Camden Planning Guidance Energy Efficiency and Adaption (January 2021) outlines how energy efficiency improvements can be achieved without causing harm to the historic environment. A Heritage Statement has been prepared by Savills Heritage and Townscape, in support of this planning and listed building application. The document outlines the considerations of improving the buildings energy efficiency and conserving the fabric of the historic building.

The proposed MEP installation has been carefully designed with a view to minimising the visible plant and making use of the new service risers to conceal MEP and existing penetrations through the building fabric where use of service risers is not feasible. Where new penetrations are unavoidable, these have been sited to allow for routing of service runs at floor level in most instances. Creation of the two new service risers as previously consented also provides an opportunity to remove much of the existing MEP fabric that impacts particularly negatively on the common parts and rear of the building at present.

The much altered interior of the building makes only a limited contribution to the overall significance of the heritage asset, and as such, these proposals are not assessed amount to harm to significance, and the aesthetic improvements offered through the removal of poorly-designed piecemeal MEP 'improvements' over the past 100 years offers an opportunity to restore some previously lost significance.

As conclude in the Heritage Statement, the proposed works will result in no adverse impact to the listed building and conservation area, indeed, the proposal offers opportunity for enhancement of significance. As such, the proposals have been designed in accordance Historic England Guidance, national, regional and local planning policy.

Noise

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. This includes noise and vibration. Where negative effects cannot be fully avoided, the policy requires appropriate mitigating actions demonstrated through assessments such as noise surveys.

Local Plan Policy A4 (Noise and Vibration) seeks to ensure that noise and vibration is controlled and managed, Permission will only be granted if it can be operated without causing harm to amenity.

A Noise Assessment has been prepared by Hann Tucker in support of this application. The assessment concludes that the proposed plant will achieve the proposed day and night-time plant noise emission criteria. The plant will create some noise, but the effect of this will be reduced with the selection of the high-performance system components and the use of the acoustic screen enclosure. The application is therefore in accordance with Local Plan Policies A1 and A4 and should be considered acceptable.

Conclusions

As a result of the proposed works, the Garth Hotel will gain an MEP installation that will offer a more sustainable and energy efficient operational system that will meet what is increasingly becoming the minimum standard expected by hotel guests, and which will allow for improved comfort in a changing climate. The switch from gas to the more sustainable electrical heating and cooling system offers climate change benefits. Meanwhile, the significance of the building, primarily deriving from the uniformity of the front façade, windows and front door, will be entirely preserved, and the future use and utility of the building will be secured. Given the current climate emergency, we should take every opportunity to reduce our dependence on fossil fuels for powering business and switch to renewable energy sources instead.

For the reasons set out above, the application conforms with adopted policy. I therefore respectfully request the grant of full planning permission and listed building consent. Should you have any queries regarding the application, please contact me using the details above.

Yours sincerely

A handwritten signature in black ink that reads "Harriet Young". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Harriet Young
Senior Planner