

12th September 2024



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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-13330474

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"). This application proposes repairs to the historic windows; replacement of non-historic windows, external façade cleaning; replacement of the roof covering and associated repairs; the reinstatement of cast-iron window sill railings; and the replacement of tiling to the front step with a new mosaic design.

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. This planning and listed building consent application seeks to continue the improvements to the hotel.

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.

Application Documents

The documents submitted for approval are:

- **Planning Application Drawings**, prepared by Studio Moren listed in the Planning Drawing Issue Sheet, issued September 2024;
- **Planning Cover Letter**, dated September 2024, prepared by Savills Planning (this document); and
- **Heritage Statement**, dated September 2024, prepared by Savills Heritage.

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.

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

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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). Gower 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 application proposals comprise:

- Repair and refurbishment of existing historic windows;
- Replacement of poor quality modern windows;
- Replacement of the roof covering and associated structural repairs to dormer windows;
- Removal of modern steel balustrade from rear parapet walls;
- Cleaning of elevations;
- Alterations to rainwater goods to accommodate extension and MEP installation;
- Reinstatement of previously removed cast-iron window box brackets; and
- Replacement of modern black and white tiling on front steps.

Full details can be found on the submitted application drawings and supporting Heritage Statement.

Planning Policy Framework

The application proposals have taken account of relevant national, regional and local planning policy. This section 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

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 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.

The Heritage Statement, prepared by Savills Heritage confirms that these proposals will not result in any impact to the significance of the building, the following sections summarise the proposals and the planning considerations.

Refurbishment of Windows

These measures for improvements to the windows have been designed to return the windows to a good and usable condition whilst improving the thermal and acoustic performance of the windows without any loss or substantial harm being caused of significant historic fabric. The proposal retains the historic appearance of the street frontage, in particular the texture of the historic glass, which is a contributor to the listed building's significance. These measures will also preserve the character and appearance of the conservation area.

Replacement of Windows

The intention with the replacement of the post-1950s windows is to return the conformation of the windows to something closer to what we believe the building would have looked like in the early part of the 20th Century, making use of modern materials to provide enhanced acoustic and thermal performance.

Replacement of roof coverings and associated structural repairs to dormer windows

The proposed will require a full strip back of the roof covering to enable improvement of ventilation to skellings voids and upright sections of the mansard structures, and installation of high-performance breathable insulation to skellings and dormer cheeks. This work item will result in a beneficial repair to the building with no adverse change to its historic character.

Removal of modern steel balustrade from rear parapet walls

It is proposed that the rail is removed, and an alternative fall restraint system is installed to protect individuals working on the roof. This work item will result in an aesthetic improvement to the building and improved safety for future maintenance with no adverse change to its historic character.

Cleaning of Elevations

The façade of the building is heavily begrimed. This dirt is obscuring brickwork details such as the rubbed brick arches and tuck pointing. It is proposed that careful cleaning using a gentle highly controllable steam cleaning system such as Doff or Thermatec could take back a degree of the darkness on the pointing to reveal these architectural details. This work item would not be carried out if the perceived change in appearance is deemed to be too striking. Approval of the patch test on brickwork on the rear of the building to be included as a pre-commencement condition for this work item.

Reinstatement of previously removed cast-iron window box brackets

Replacement brackets will be cast in iron from moulds taken from an adjacent building to ensure facsimile reproduction. Reinstatement of this feature will restore a lost element of the Victorian remodelling of the house and will contribute positively to restoring this element of unity of the terrace and will enhance the significance of the listed building and the conservation area.

Replacement of modern black and white tiling on front steps

The tiles covering the external steps leading to the front door are twentieth-century in date. An in keeping and appropriate intervention to create a new mosaic design for the front step of the Garth Hotel. The design will be an enhancement to both the listed building and the conservation area.

Summary

As concluded in the Heritage Statement, the proposed works will result in no adverse impact to the listed building and conservation area. The proposals have been carefully devised to be sympathetic to the character and fabric of the listed building. The works to the roof will remedy decades of patched repairs, the historic windows will be retained while also being made more energy efficient and acoustically effective. The installation of iron window box railings will restore a lost Victorian feature and enhance the terrace's consistency of appearance.

The application is therefore in accordance with Historic England Guidance, meets the requirements of the NPPF and provides sufficient information in regards to the heritage considerations relating to the proposals, as currently known.

Conclusions

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 cursive script that reads "Harriet Young".

Harriet Young
Senior Planner