Address:	**199 - 206 High Holborn London WC1V 7BD**	
Application Number:	2011/4914/P	**Officer: Neil McDonald**
Ward:	Holborn & Covent Garden	
Date Received:	**27/09/2011**	

Proposal: Change of use from existing office (Class B1) to a hotel (Class C1); erection of fourth floor extension along Newton Street frontage in place of existing roof top plant enclosure along with provision of refuse store, car parking and cycle parking.

Drawing Numbers:
Site location plan; 2902/: P100, P102, P103 Rev A, P104, P105, P106, P107, P108, P109 Rev E, P110 Rev B, P111 Rev B, P112 Rev A, P113 Rev A, P114 Rev A, P115 Rev A, P116, P117, P118, P119;
Design and Access Statement by Axiom Architects dated Sept 2011; Transport Statement by Russell Giles Partnership dated Sept 2011; Travel Plan by Russell Giles Partnership dated Sept 2011; Noise Impact Assessment by AECOM dated Sept 2011; BREEAM Pre-Assessment by Building Services Consultancy dated Sept 2011; Flood Risk Statement by CambellReith dated Sept 2011; Energy and Sustainability Strategy dated September 2011; Planning Statement by GVA dated Sept 2011; Daylight/Sunlight Report GVA dated Sept 2011.

RECOMMENDATION SUMMARY: Grant Subject to a Section 106 Legal Agreement

Related Application Date of Application:	**27/09/2011**
Application Number:	**2011/4918/L**

Proposal: Alterations in connection with the change of use from existing office (Class B1) to a hotel (Class C1), removal of roof top plant enclosure and erection of an extension at fourth floor level along the Newton Street frontage, along with provision of refuse store, car parking and cycle parking.

Drawing Numbers:
Site location plan; 2902/: P100, P102, P103 Rev A, P104, P105, P106, P107, P108, P109 Rev E, P110 Rev B, P111 Rev B, P112 Rev A, P113 Rev A, P114 Rev A, P115 Rev A, P116, P117, P118, P119; Design and Access Statement by Axiom Architects dated Sept 2011; Planning Statement by GVA dated Sept 2011.

RECOMMENDATION SUMMARY: Grant Subject to a Section 106 Legal Agreement

Applicant:	**Agent:**
Ediston Opportunity Fund C/O Agent	GVA 10 Stratton Street London W1J 8JR

ANALYSIS INFORMATION

Land Use Details:

	Use Class	Use Description	Floorspace (gross internal)
Existing	*B1a Business – Office* *Roof plant enclosure*		*4521 m²* *150 m²*
Proposed	*C1 Hotel*		*4846 m²*

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	*9*	*0*
Proposed	*0*	*4*

OFFICERS' REPORT

Reason for Referral to Committee: This application is reported to Committee because it is a major development involving change of use of more than 1,000sq. mtrs of floorspace [clause 3(i)] and the making of a complex Section 106 legal agreement [clause 3(vi)].

The application is defined as a 'major development' and therefore needs to be determined within 13 weeks from the date of submission which expires on 27th December 2011.

1. **SITE**

1.1 The site comprises a corner plot on the south side of High Holborn and the west side of Newton Street. It is occupied by a part five/six storey office building with a ground floor retail frontage onto High Holborn. The return frontage onto Newton Street is wholly in office use and drops down to four storeys but with a full-story height plant enclosure along part adding to the total height. The whole of the office accommodation is currently vacant.

1.2 Part of the site, comprising, nos199-201 High Holborn, is a grade II listed building. This was listed in 1973. However since that date it has been entirely demolished behind its façade and the existing building erected in its place following permission for redevelopment of the site in the late 70s. Only the Italianate Renaissance Façade remains, which dates from circa 1870.

1.3 The site includes a service yard to the rear which is accessed from Newton Street.

1.4 To the south of the site on Newton Street is a 13-storey residential flat block and west of this, the 5-storey Green Dragon House takes the form of a residential courtyard development accessed from Stukely Street, the rear elevation of which backs onto the service yard of the site. On the east side of Newton Street Nos 1-27 are wholly residential, comprising flats at Nos 1-3, Aria House, Hayden House and

Holland Dwellings which are predominantly 4-6 storeys in height. Adjoining the site to the west is the site of the former Holborn Town Hall comprising Nos 197-198 High Holborn and land to the rear fronting Stukeley Street which underwent conversion for office, restaurant and community use following planning permission granted in 2000.

1.5 Newton Street is one-way for motorised traffic in the north direction with a traffic lighted junction onto High Holborn. There is a south-bound cycle route on the street.

1.6 The site is within the Central London Area and Clear Zone. The character of High Holborn is predominantly commercial and the ground floor retail frontage is designated as Central London frontage in the LDF. Although not itself part of a designated growth area, the site does fall in between the respective Growth Areas for Tottenham Court Road to the west and Holborn to the east. The site also forms part of the Bloomsbury Conservation Area.

2. THE PROPOSAL

Original

2.1 The proposal relates to the upper floors of the building and is for the change of use of the existing B1 offices to a 138 bedroom hotel. The ground floor retail uses will remain unaffected and the rear service yard will be retained for the servicing of the building including the proposed hotel use.

2.2 The application also includes an extension at roof level of 325sqm floorspace to create a new fourth floor level along the Newton Street building frontage. This replaces the existing plant room (150sqm equivalent floor area) at this level and extends the length of this frontage as opposed to part way along which is the case for the existing plant room.

2.3 Except for this additional storey there are no proposed changes to the external appearance of the building.

2.4 The intended end-occupier for the building is Premier Inn of the Whitbread Group of hotels.

Revision[s]

2.5 Minor revisions to the floor plan layout were submitted at the request of officers in order to relocate internal partitions away from window openings in the listed building façade.

3. RELEVANT HISTORY

3.1 The current building on the site was constructed following planning permission granted in the 1970s (applications refs: P14/30/C/24765; P14/30/C/25458; P14/30/C/26509; P14/30/C/28866) for "*The retention of the existing facade at numbers 199-201 High Holborn and the redevelopment of the site of the remainder*

of the building together with the sites of numbers 201-206 (consecutive) High Holborn and numbers 2-8 (even) Newton Street for shops, offices, housing and ancillary storage, servicing and car parking areas and plant rooms". The site then included 8 High Holborn which is now a separate demise occupied by the existing 13-storey block of flats.

3.2 More recent decisions on the site include the following:

2004/5228/P & 2005/0721/L - Erection of a 1.8m high louvered enclosure with associated 2x air handling units onto the roof – Granted 18/04/2005

PSX0004344 - The retention of the use of part of the rear of 203 High Holborn as a mail room, together with the erection of a new steel loading bay – Granted 31/08/2000

PS9805164 - Retention of air handling plant on the rear flat roof and the erection of an acoustic enclosure around the plant and a railing around the parapet – Granted 01/11/1999

9501839 - The erection of metal fencing with gates to enclose two exits at the rear of the building – Granted 01/12/1995

4. CONSULTATIONS

Statutory Consultees

4.1 English Heritage – Have confirmed that the application should be determined by the Council in accordance with national and local policy guidance.

Other Consultees

4.2 Thames Water have submitted comments on the application requesting a piling method statement and that the applicant be made aware of various measures to be taken with regard to any new drainage infrastructure connecting to the public sewer. On-site surface water retention is advised. Thames Water have indicated that they have to date been unable to determine the capacity of water supply infrastructure to serve the proposed development and if they cannot reach agreement with the applicant would object to the application on grounds of insufficient capacity in infrastructure.

Conservation Area Advisory Committee

4.3 Bloomsbury CAAC have objected due to worry that the current proposal will inevitably be followed by one for replacing the rooftop plant which is to be removed to make way for the top floor extension. However they confirm there is no objection in principle.
[Applicant has stated in the Design and Access Statement that sufficient space exists in the plant room atop the existing fifth floor and in the basement for all the

hotel's plant needs. Any subsequent application for roof top plant that might come forward in future would be assessed on its merits]

Adjoining Occupiers

Number of letters sent	118
Total number of responses received	8
Number of electronic responses	4
Number in support	1
Number of objections	6

4.4 A site notice was erected on 14/10/2011, expiring on 04/11/2011. A press notice was published on 20/10/2011, expiring on 10/11/2011.

4.5 Four objections were received from occupiers of the block of flats at 8 Newton Street; a further objection from a resident of 1-3 Newton Street along with an objection from the housing manager (Soho Housing Association) for the blocks at 1-3 Newton Street, 16-19 Hayden House and 19-33 Stukeley Street. The objectors' points related to the following issues:

- Newton Street is a closely confined residential street unable to sustain additional pressures from traffic and deliveries
- Increased noise, traffic and general disruption from a 24 hour hotel use as opposed to the existing "9am-5pm" office at the site
- Noise from early morning or night-time deliveries would particularly affect occupiers of 8 Newton Street which overlooks the service yard of the building
- Other traffic noise and fumes/air pollution emanating from taxis/coaches which get held for long periods at the red lights onto High Holborn
- Danger to cyclists using the cycle lane in Newton Street from increased vehicular traffic
- Reduced sunlight and daylight resulting from the additional floor
- Noise and possible anti-social behaviour from hotel residents coming and going late at night
- Noise and disruption to the street during the works period
- Cumulative impacts on amenity from other hotels in the area and the Sainsburys service yard also accessed from Newton Street (opposite the site).
- It was pointed out by one objector that there are already six hotels within 200 meters of the site: Kingsway Hall Hotel (Great Queen Street), Chancery Court (High Holborn), Travel Lodge Drury Lane, Citadines High Holborn and The Grange Holborn
- The priority should be social housing

[*Officer comment: It is noted that many of the above traffic-related objections are associated with a 'planned carpark' for the hotel. The proposal actually reduces existing car parking spaces within the service area from 9 standard spaces to 4 disabled spaces. No other parking would be proposed. Therefore parking-related traffic generation arising from this site should reduce, not increase as a result of the proposals.*]

4.6 One local resident has commented that they would object to any on-street parking in connection with the hotel but would not object if this was all to be contained within the existing service yard *[which it is]*.

4.7 **Ward Councillor, Julian Fulbrook** has asked his view to be recorded that this is an “inappropriate planning proposal”.

5. POLICIES

5.1 Set out below are the LDF policies that the proposals have primarily been assessed against. However it should be noted that recommendations are based on assessment of the proposals against the development plan taken as a whole together with other material considerations.

LDF Core Strategy and Development Policies

CS1- distribution of growth
CS3 – other highly accessible areas
CS5 – managing impact of growth
CS8 – promoting a successful and inclusive economy
CS9 - achieving a successful Central London
CS10 - supporting community facilities and services
CS11- sustainable travel
CS13 - tackling climate change through promoting higher environmental standards
CS14 - promoting high quality places and conserving our heritage
CS15 – parks, open spaces and biodiversity
CS19 – delivering and monitoring the Core Strategy
DP1 – mixed use development
DP2 – making full use of Camden’s capacity for housing
DP13 – employment premises and sites
DP14 – Tourism development and visitor accommodation
DP15 - community and leisure uses
DP16 - transport implications of development
DP17 - walking, cycling and public transport
DP18 - parking standards and limiting the availability of carparking
DP19 - managing the impact of parking
DP20 - movement of goods and materials
DP21 - development connecting to the highway network
DP22 - promoting sustainable design and construction
DP23 – water
DP24 – securing high quality design
DP25 - conserving Camden’s heritage
DP26 - managing the impact of development on occupiers and neighbours
DP28 - noise and vibration
DP29 - improving access
DP31 – open space and outdoor recreation
DP32 - air quality and Camden’s clear zone

5.2 **Supplementary Planning Policies**
Camden Planning Guidance 2011
Bloomsbury Conservation Area Appraisal and Management Strategy 2011

Strategic and Government Policy

5.3 London Plan 2011
PPS1, PPS4, PPS5, PPG13.

6. ASSESSMENT

6.1 The main issues are considered to be:

- The acceptability of a hotel in policy terms and the loss of the existing office use
- Effects on the special interest of the listed building and the contribution it makes to the character and appearance of the Bloomsbury Conservation Area
- Managing the transport impacts
- Residential amenity
- Sustainability

Land use principles

6.2 New hotel accommodation is supported in the Central London Area by policies CS9 and DP14 subject to policies protecting employment and residential uses being met first. Tourism and visitor accommodation is particularly encouraged within the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn.

6.3 The main objective of the LDF employment policies (policies CS8 and DP13) is to retain viable employment space where this exists and to encourage residential in particular, through change of use where sites or premises are no longer suited to employment.

6.4 Policy DP1 is also relevant where proposals entail additional floorspace through extensions or redevelopment. A mix of uses including up to 50% residential would be expected on sites where the (gross) additional floorspace resulted in an uplift of 200sqm. In this application whilst the extension at roof level comprises some 325sqm floorspace to create a new fourth floor, this replaces the existing plant room of 150sqm equivalent floor area, meaning that the gross uplift in floorspace is only 175sqm. The DP1 policy requirement for residential use is therefore not triggered in this case.

6.5 DP13 seeks to implement the priorities outlined in CS8. It states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use unless it can be demonstrated that the site is no longer suitable for its existing business use and there is evidence that the possibility of re-using or redeveloping the site for alternative business use is not viable. An exception may be made to this approach where it can be demonstrated that the site is only suited to B1a office use, in which case residential or community use would be sought.

6.6 Camden Planning Guidance (CPG5) adds clarification as to the circumstances where a change of use from offices would be acceptable. More particularly this states that a change of use may be allowed in the case of older office premises since it is expected that new office accommodation coming on stream during the plan period will meet projected demand. The guidance (para 6.4) goes on to list various criteria to be taken into account when assessing applications for a change of use from B1 to a non-business use. These include factors such as the age and condition of premises; whether there are existing tenants in the building; location and whether there is evidence of demand. Marketing information may be requested to assist in making an assessment of the premises for its suitability for continued business use.

6.7 A marketing assessment was submitted in accompaniment to the application undertaken by GVA in conjunction with Fairbrother, detailing a comprehensive marketing campaign for more than a 2 year period. The marketing formally commenced in August 2009 when the most recent tenant, BT, was still in occupation. BT moved out of the premises in April 2010 although their lease does not expire until 2025. A sample of parties to have inspected the premises during 2010 and their reasons given for not pursuing their interest appears to bear out that the office space is relatively old, does not have the features required by tenants looking for modern office accommodation and would require significant investment to bring it up to modern standards that would attract tenants. The report concludes that whilst there is a good level of demand generally in the Holborn area, this predominantly relates to refurbished or new developments which due to the relatively plentiful supply, can be found at rents not significantly higher than second hand space such as at 199-206 High Holborn. The cost of refurbishment, meanwhile, would involve significant capital expenditure which would be speculative and not readily undertaken given the current market uncertainties.

6.8 Officers consider that the marketing report is comprehensive and comes from a credible source (Fairbrother), who were acknowledged by Roger Tym & Partners as one of their main sources of data for the Midtown office supply for the Camden Employment Study. The information provided is considered to meet the criteria set out in CPG5.

6.9 In such instances where the Council agrees to the loss of office floorspace there is a clear expectation expressed in policy DP14 that the replacement use would be permanent residential or community use. However notwithstanding the clear preference shown by the policy for residential, there are a number of factors noted in this particular case that would encourage/support hotel provision, namely;

- Support for provision of new hotel accommodation in London Plan
- Suitability of site for hotel accommodation in context of proximity to Holborn and Tottenham Court Road
- Potential environmental factors which would come into play in this case in terms of the site location and its suitability for residential accommodation.

6.10 The Mayor of London’s Economic Development Strategy seeks to promote London as the world capital of business and the world’s top international visitor destination and the world’s leading international centre of learning and creativity (para 4.9).

Improving the availability of hotel accommodation in sustainable locations is seen as central to achieving these objectives and to ensure adequate hotel provision Policy 4.5 of the London Plan sets a target of 40,000 net additional hotel rooms by 2031. It also encourages hotel development particularly within the Central London Opportunity Areas such as Tottenham Court Road and Intensification Areas including Holborn. The Hotel Demand Study (2006) which forms part of the evidence base for the London Plan identifies an estimated requirement for 2,500 net additional hotel rooms in LB Camden between 2007 and 2026. It is noted in the LB Camden Annual Monitoring Report 2009/10 that there had been no net gain of completed hotel accommodation in the Borough.

6.11 Set against this climate of encouragement is policy DP2 which seeks to resist alternative development on sites that are considered particularly suitable for housing. However, the particular circumstances of the site which fronts onto High Holborn -a busy main route, and the building itself, would not appear readily suited to a residential conversion. The layout and orientation of the existing building would constrain the ability to create good quality residential accommodation, particularly in terms of avoiding single aspect units, creating units with favourable outlook, provision of onsite private and communal amenity space and achieving appropriate daylight/sunlight conditions. There are a number of other design constraints associated with converting the building to residential use which do not make it "particularly suitable" including the core arrangements, structural grid and existing columns and the floor to ceiling heights.

6.12 Furthermore, the operational requirements of a hotel such as is proposed include the provision of an integral bar and restaurant facility which can only be located on the ground floor of the Newton Street frontage due to the existing ground floor retail units on High Holborn, which are subject to ongoing leases and are part of the protected Central London Frontage. This means that there are a number of competing uses at ground floor level and the ability to provide separate access points, cores and servicing arrangements for a mixed use residential and hotel development is very constrained. The further requirement to provide affordable housing and the associated need for a further separate access and core arrangement would further complicate matters.

6.13 The principle of hotel use is therefore considered justified in this instance and in accordance with LDF policies CS8, DP13 and CS9.

6.14 Notwithstanding the loss of office floorspace, it should be acknowledged that the proposed use is likely to provide additional employment opportunities in itself (43 full time and 8 part time jobs) and that a large hotel use in this location is likely to have a beneficial knock-on impact on support businesses such as cleaning and catering companies, in addition to supplementing the night-time economy in the wider area.

6.15 The applicants have agreed to a financial contribution of £70,523 towards local training and employment initiatives to mitigate the loss of employment opportunity through the change of use. This is based on the formula and assumptions set out in CPG8. The applicants have also agreed to a variety of employment and local procurement initiatives throughout the construction and operational phases,

including one construction trade apprentice equivalent and two hospitality industry apprenticeships within the completed development. These will be secured by a Section 106 legal agreement.

Listed building and design-related considerations

6.16 The part of the site comprising 199-201 High Holborn is a grade II Listed building. However the only historic element remaining of this is its façade as it was demolished behind the façade in the 1970s to make way for the existing building. The interior of the building is a modern open plan office space and therefore the principle of the conversion to a hotel use and sub-division of the space can be easily accepted.

6.17 The only concern from a listed building perspective is that the insertion of partitions does not conflict with the original window openings to the front façade. The revision to the proposals during the course of the application is considered to have achieved a satisfactory outcome in this respect.

6.18 The principle external alteration involved in this proposal is the addition of a new fourth floor level of accommodation to the rear part of the unlisted 203-206 High Holborn. This would be in part replacement of an existing roof top plant enclosure. The applicant has stated in the Design and Access Statement that the plant enclosure over the existing fifth floor level will be sufficient to contain all of the plant needed for the hotel use, enabling the removal of all plant from the flat roof along Newton Street. There is also understood to be ample space in the basement to accommodate additional plant should this become necessary in the future.

6.19 The part of the building to be extended currently forms a lower set-back block on Newton Street which is subordinate to the main block fronting High Holborn. The façade of the Newton Street building would simply be extended up by an extra storey which replicates the detail of the existing façade (including the reproduction of the concrete band at the top which acts as a blocking course). Extending the building upwards in this manner would not harmfully alter the appearance of the façade which is designed around uniform floor heights and repetitive detailing rather than a hierarchy or proportioned appearance. The Newton Street block would still be a storey lower than on High Holborn which would give it an element of subservience and address the transition in scale between the two streets. Additionally the existing set back of the Newton Street block in footprint would maintain a sense of modulation and relieve any additional sense of overall bulk as a result of the extension.

6.20 On Newton Street the extra storey would be seen as juxtaposed between the taller High Holborn Block and the fourteen storey tower at 8 Newton Street so the extra height will not make this building appear dominant. Additionally the Newton Street Block would be no taller than the buildings on the opposite side of the street (1 and 15-19).

6.21 Subject to details of sample panels of all facing materials which would be required by a condition attached to any grant of permission, it is considered that the

proposed works are considered to preserve the special interest of the listed building and the character and appearance of Bloomsbury Conservation Area.

Transport and access

6.22 A transport statement has been prepared for the development by Russell Giles Partnership (RGP). This includes a work place and visitor travel plan which would reduce the need to travel, increase the attractiveness of walking, cycling and public transport and minimise harm to the community from traffic related noise, congestion and pollution. It is proposed that car parking provision on the site is reduced from 9 spaces currently, to 4 disabled spaces. Camden parking standards require 5 disabled spaces (4 for customers and 1 for staff) for a hotel establishment of this size. In this case the 4 on-site spaces may be supplemented by an additional existing disabled bay available on Newton Street, which is acceptable.

6.23 Cycle parking will be provided in the form of 20 cycle lockers indicated as being provided within the service yard. This number of spaces is in line with the LDF standard for hotel development and full details of these will be required by condition to ensure they are provided to the correct specification and permanently retained. It is noted that the predicted modal share for cycling derived from the TRAVL (Trip Rate Assessment Valid for London) database as being 0%. The travel plan should be updated setting targets that exceed this figure (e.g. 5% of employee trips) when this is formally submitted as required by a section 106 agreement attached to any permission that may be granted.

6.24 An important aspect of the proposal is the comparison of its potential trip generation with that expected to be generated by the site's lawful operation as a B1 office. In order to assess this RGP has considered the TRAVL database for similar central London office sites. With regards to the proposed use, survey data was obtained from the Central London Eccleston Square Premier Inn at Victoria SW1, on a typical working day (Thursday 18th February between 0700 and 2300 hours). This was 'factored-up' to reflect the number of rooms (138) proposed.

6.25 Over the course of a typical day the existing office use would be expected to generate in the order of 1627 two-way daily trips by all modes, with around 27 of these trips being made by private car and 6 by taxi. In comparison, the proposed hotel use is estimated to generate 1288 two-way trips of which 6 of these would be by private car and 15 by taxi. This suggests that the proposed hotel would result in a reduction in overall trips, including over 20 less car trips over a typical day, although this would be partly offset by an increase of 9 taxis daily.

6.26 The proposed Premier Inn is not expected to generate a need for coach parking and no dedicated coach drop off/pick up facility will be provided. The applicant has indicated that they would be prepared to accept a condition to preclude coaches from servicing the hotel.

6.27 The above data does not include service vehicle trips. Based on other Premier Inn hotel developments in similar locations it is predicted that the site would generate 3 x food and consumable deliveries, 1 x beer/liquor deliveries, 3 x refuse collections

6.28 A Service Management Plan (SMP) was included as part of the submitted Transport Statement and provides for all servicing to be carried out within the existing site service area. Tracking diagrams for a 12 metre delivery vehicle have been provided to confirm that this is enabled without impacting upon the disabled bays or cycle parking provision.

6.29 Overall, the proposal is considered acceptable in transport terms subject to the above recommended conditions and a section 106 agreement covering the following terms:

- Work Place and Visitor Travel Plan (TP) to be approved prior to occupation
- Construction Management Plan (CMP) to be submitted and approved prior to any works starting on site
- Servicing Management Plan (SMP) to be approved prior to any works starting on site
- Financial contribution to enable resurfacing of footways adjacent the site
- A financial contribution of £50,000 towards pedestrian, cycling and environmental improvements in the vicinity of the site (e.g. Legible London and Cycle Hire Schemes. This is considered necessary to offset the potential demands placed upon the transport infrastructure of the area from the changing pattern of trips generated within the area as a result of the proposal.

Amenity impacts

6.30 Given the residential nature of much of Newton Street it is necessary to have regard to the potential impacts of a hotel use on the residential amenity of its surroundings. It is also a requirement set by DP14 that new hotels should not harm the balance and mix of uses in the area, local character, residential services or amenity. As borne out by local objections to the proposal the impacts most likely to be associated with the use would be noise and nuisance from the comings and goings of hotel residents, transport related impacts such as congestion from additional taxi trips and site servicing; and impact on sunlight and daylight as a result of the proposed roof extension.

6.31 In terms of transport related impacts on amenity, trip generation in association with the proposal has already been examined in the previous section and is considered not to result in any overall increase in trips to the site. There is however a slight increase anticipated in trips by taxis (around 9 additional trips daily). Taxi pick up/drop off could be facilitated from a number of locations including from the rear service yard if approaching the site from the south along Newton Street. However

the hotel reception is directly accessed from the front entrance on High Holborn. Taxis can readily drop off guests directly at this access point which is not subject to any drop-off restrictions. Furthermore there are a number of loading/parking bays on the north side of High Holborn opposite the hotel from where guests can conveniently use the existing signalised crossing facilities to access the hotel. It is therefore envisaged that the majority of visitor related comings and goings including taxi drop-offs will take place from High Holborn rather than Newton Street and thereby have little or no impact upon neighbouring residents.

6.32 In terms of cumulative impact, whilst there are already a number of hotels in the area, this is set within the context of the high density of land uses in this part of Central London generally. Notwithstanding that Newton Street itself is much more residential in character than many of the neighbouring streets, there is no reason to believe that the change of use of this existing office building will harm the balance or mix of the area in any way that would impact on Newton Street or any other enclave in particular.

6.33 The potential impacts on sunlight and daylight have been examined by a BRE sunlight and daylight report prepared by GVA. This analyses the affects upon residential flats at 15-19 Newton Street and 8 Newton Street which are located closest to the part of the building to be extended. Nearby residential properties not included in the analysis include Green Dragon House which faces the site from across the west side of the service yard, and 1-3 Newton Street. 1-3 Newton Street is directly opposite the existing roof plant enclosure which is currently of greater height (1.75m) than the roof extension that would replace it, so for the flats in this building there would be a marginal improvement in terms of outlook and daylight. Green Dragon House faces the corner of the part of the building where the extension is proposed and has no residential windows facing the site below 3rd floor level so would stand to be less affected.

6.34 The BRE tests undertaken in this case make reference to the Vertical Sky Component (VSC) in assessing the effects on daylight and the Annual Probable Sunlight Hours regarding sunlight.

6.35 VSC is a factor of the potential skylight reaching a window wall of a building and would measure 40% for a totally unobstructed wall. A VSC of 27% or above is considered by BRE to afford potential for good natural daylighting, although not the actual level of daylight in a room which depends on other factors such as the size and/or number of windows and depth of the room. However VSC is a good indicator as to whether there will be a noticeable impact on daylight and whether it is appropriate to make a more thorough assessment using other methodologies. BRE considers that under normal conditions a reduction in VSC to up to 0.8 times its former value can be experienced before the light reduction in a room starts to become noticeable.

6.36 In the case of these development proposals the resultant effect on VSC to surrounding windows is found to be in almost all cases within 20% of the existing values which would not be considered a noticeable impact. Out of the 52 assessment points taken in total, only five windows would fall below 0.8 times its former value and four of these would attain a 0.79 ratio reduction. The remaining

window (to a second floor flat in 8 Newton Street) would obtain a 0.71 value which is still a relatively marginal reduction in its own right, especially considering this is from a relatively low base value of 17.5% VSC meaning that only a small level reduction in absolute terms would have a proportionately greater effect in percentage terms. This is not considered indicative of a level of daylight reduction to merit further investigation given the inner urban context of this case.

6.37 Turning to sunlight, the Annual Probable Sunlight Hours test is only relevant to windows facing within 90-degrees of due south of the obstruction –i.e. in this case 15-19 Newton Stree. No. 8 Newton Street which lies south of the proposal site and therefore addresses it with a northerly aspect, has not been included in this test. This measures potential access to sunlight expressed in terms of a percentage of probable sunlight in an average year to a totally unobstructed flat piece of ground. The two main parts to the test are total annual sunlight and winter sunlight which BRE recommends should be at least 25% and 5% respectively. Reductions below these figures would again become noticeable if below 0.8 times their former value.

6.38 Similarly to the daylight test results the impact on sunlight is shown to be marginal, being generally well above the 0.8 reduction threshold guideline. In one instance of a first floor room would the value fall below this in which case it obtains a 0.79 ratio reduction which is not likely to represent a significant loss of amenity.

6.39 It is therefore considered that the proposal is unlikely to give rise to any significant impact on sunlight and daylight, or any other loss of amenity to the existing residential occupiers in the area.

Sustainability

6.40 The LDF policy DP22 and CPG3 require all changes of use over 500 sqm to submit a BREEAM pre-assessment with an expected target rating of ‘Very Good’ and obtaining 60% of the un-weighted credits in the Energy category, 60% in the Water category and 40% in Materials.

6.41 A BREEAM pre-assessment has been prepared by Building Services Consultancy which indicates that over 60% of available credits will be achieved in all three of the key categories, i.e. Energy – 62%; Water – 62.5% and Materials 61.5%. Overall the scheme is expected to achieve a ‘Very Good’ score. A post construction review should be secured via S106 to ensure that these targets are achieved in the final design.

6.42 The LDF (policy CS13) and CPG3 also require developments to contribute to the Borough’s objective of meeting its 2050 target for achieving 80% reduction in CO2 emissions in order to help combat climate change. As part of this developments must consider renewable energy with Camden adopting the London Plan target for this purpose of 20% of energy requirements of any new development to be provided through on-site renewable sources.

6.43 The BREEAM pre-assessment for the purposes of meeting the Energy Category target objectives has indicated that the inclusion of a gas fired CHP on site will

reduce CO2 emissions by 27%. This should form part of a package of measures in line with the London Plan energy hierarchy (1- use less energy, 2- supply energy efficiently and 3- use renewable energy sources). An Energy Strategy has been prepared to inform the applicant's approach in this regard.

6.44 The Energy Strategy details various measures through which the building fabric performance and its use of energy will be made more efficient including insulation to walls and windows, low energy lighting and use of heat recovery and air source heat pumps. This is expected to achieve a 4.2% reduction in CO2 emissions over the Part L 2010 Building Regulations Target Emissions Rate (TER) or 10.1% taking account of additional potential reduction from heat recovery.

6.45 The choice of gas fired CHP for the second stage of the energy hierarchy has been chosen after having examined the preferred options of connecting to a district heat network and renewable powered CCHP/CHP. There are presently no existing district heating opportunities within the area of the application site and renewable 'bio-fuel' sources for powering on-site plant either have unresolved issues or need too large an amount of space to be viable on a central London site such as this. The applicant confirms that the proposed design of the building services systems will be such as to enable connection with any heat distribution network that may become available in the future. The full details in this regard should be secured via S106.

6.46 Consideration has been given to incorporating one or more of the various renewable technologies available. However due to the central London location and listed status of the building, the majority of these were found to be impracticable. With the gas fired CHP and energy efficiency measures the overall CO2 reduction of 27% likely to be achieved satisfies the London Plan 2011 requirement for 25% improvement on the 2010 Building Regulations.

6.47 Notwithstanding the above it is not accepted from the applicant's energy statement that Solar PV can be discounted on the basis of it being likely to give a poor return on investment. There would appear to be scope for solar panels to be included at roof level and therefore the developer should be required to undertake further work to examine the feasibility of this technology by way of the S106 agreement.

6.48 The proposals include a brown roof above the new extension element to the building which would be considered to enhance the biodiversity value of the site as required by policy CS15. The submitted flood risk statement states that the opportunity for introducing green or brown roofs on other parts of the building has been reviewed but not considered feasible due to the existing roof structure being unlikely to have sufficient capacity to support the additional weight.

6.49 Water consumption is expected to increase with the proposed change of use. In order to minimise the impact of the development on local water infrastructure, water saving techniques such as low-flow taps and showers and dual flush toilets will be incorporated to help reduce site consumption. The applicant is still in discussion with Thames Water to address their concerns about the water supply infrastructure capacity in the area. Although Thames Water have to date still not confirmed the capacity of water supply infrastructure it is considered that given this central

London location it would be unreasonable to withhold permission for this reason alone. The applicant has confirmed that it is their intention to increase the water storage capacity of the existing building as part of the proposals to reduce demand on the water supply during peak periods. The details in this regard would need to be secured by condition.

Other matters

6.50 Accessibility – Policy 4.5 of the London Plan states that development for visitor accommodation should ensure that at least 10% of bedrooms are wheelchair accessible. However the Design and Access Statement indicates that only 7 'universal access' bedrooms are proposed –i.e. 5%, compliant with Building Regulations only. A condition should therefore be attached requiring that this figure should be increased in line with the London Plan and requiring details to be submitted.

6.51 Public open space – Although there is a modest scale extension to the building there is no evidence that numbers of persons using the building will necessarily increase with the proposed change of use, or that additional demands would be placed upon open space in the Borough. Therefore a contribution towards open space will not be sought.

7. CONCLUSION

7.1 It is considered that the proposed provision of hotel accommodation at the site is considered appropriate given its highly accessible and sustainable location and provides an opportunity to bring back into beneficial use an underused building. The proposal would also assist in the ongoing renewal of this area which adjoins two of Camden's key central London growth areas.

7.2 The application site, if retained in its existing office use, would need to undergo substantial refurbishment to meet modern day needs and even if this was undertaken the premises would still not compete with more recently built office floorspace in the area of which there is a plentiful supply. The proposed hotel use would provide accommodation for visitors which would in turn support local businesses as well as other Central London uses in the area. The proposal would be subject to a legal agreement which would ensure that local employment and procurement opportunities are provided.

7.3 By agreeing to enter into a section 106 agreement for provision of a travel plan, service management plan, sustainability plan and contributions towards environmental, pedestrian and cycle improvements in the area, the development would enable its impacts upon the local infrastructure and the ebvironment to be suitably off-set. Similarly with the appropriate management plans in place there is no reason to suggest that the operation of the hotel in this location would be to the detriment of neighbouring residential amenities.

7.4 The proposed alterations to the building, including a roof extension, are considered acceptable both in terms of its listed status and the contribution made to the character and appearance of the conservation area. Furthermore, they would achieve a reduction in the CO2 emissions of the building of 27%.

7.5 **Planning Permission is therefore recommended subject to a S106 Legal Agreement.**

Section 106 Heads of Terms:

- financial contribution of £70,523 towards local training and employment initiatives

- employment plan to work with LB Camden Economic Development Team and Kings Cross Construction to ensure residents are provided with employment opportunities throughout the construction and end phase of the development – working to a target of 20% of residents employed

- recruitment of one construction trade apprentice or equivalent (£7,000 contribution where length of the project does not allow for a placement) and two hospitality industry apprenticeships within the completed development

- Local procurement plan for Camden businesses to tender for supply of goods and services during the construction phase

- Work Place and Visitor Travel Plan (TP) to be approved prior to occupation (NB to reflect 5% modal share for cycle trips)

- Construction Management Plan (CMP) to be submitted and approved prior to any works starting on site

- Servicing Management Plan (SMP) to be approved prior to any works starting on site

- Financial contribution of £TBA to enable resurfacing of footways adjacent the site

- A financial contribution of £50,000 towards pedestrian, cycling and environmental improvements in the vicinity of the site

- BREEAM Plan

- Energy Plan – to include on-site CHP and future proofing for district network and feasibility and viability study for solar panels

7.6 In the event that the S106 Legal Agreement referred to above has not been completed within 13 weeks of the date of the registration of the application, the Development Management Service Manager be given authority to refuse planning permission for the following reasons:-

1. *The proposed development, in the absence of a legal agreement securing contributions for training and employment, would fail to provide for necessary retraining and re-employment of local people contrary to policies CS5 (Managing impact of growth) and CS8 (Promoting a successful and inclusive Camden economy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 (Employment premises and sites) of the London Borough of Camden Local Development Framework Development Policies.*

2. *The proposed development, in the absence of an Employment Plan including apprenticeships for promoting job opportunities for Camden's residential communities, would fail to make a sufficient contribution towards meeting the needs of Camden's residents contrary to policy CS5 (managing the impact of growth and development) and CS8 (Promoting a successful and inclusive Camden economy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 (Employment premises and sites) of the London Borough of Camden Local Development Framework Development Policies.*

3. *The proposed development, in the absence of a local procurement plan would fail to contribute towards the economic renewal of the area contrary to policies CS5 (Managing impact of growth) and CS8 (promoting a successful and inclusive economy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 (Employment premises and sites) of the London Borough of Camden Local Development Framework Development Policies.*

4. *The proposed development, in the absence of a travel plan, would be likely to give rise to significantly increased car-borne trips contrary policy CS11 (sustainable travel) of the London Borough of Camden Local Development Framework Core Strategy and DP16 (transport implications of development) of the London Borough of Camden Local Development Framework Development Policies.*

5. *The proposed development, in the absence of a construction management plan, would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to DP20 (movement of goods and materials) and DP26 (impact on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.*

6. *The proposed development, in the absence of a service management plan, would be likely to give rise to conflicts with other road users, pedestrians and local residents contrary to DP20 (movement of goods and materials) of the London Borough of Camden Local Development Framework Development Policies.*

7. *The proposed development, in the absence of a legal agreement securing necessary contributions towards highway works would fail to make provision to restore the pedestrian environment to an acceptable condition after the contrary to policy CS11 (sustainable travel) of the London Borough of Camden Local Development Framework Core Strategy and DP17 (walking, cycling and public transport) of the London Borough of Camden Local Development Framework Development Policies.*

8. *The proposed development, in the absence of a legal agreement securing necessary contributions towards pedestrian and environmental improvements in the area would fail to make sufficient provision in a sustainable manner for the increased trips generated by the development contrary to policy CS11 (sustainable travel) of the London Borough of Camden Local Development Framework Core Strategy and DP17 (walking, cycling and public transport) of the London Borough of Camden Local Development Framework Development Policies.*

9. *The proposed development, in the absence of a sustainable buildings plan, would fail to ensure a sustainable and resource efficient approach contrary to policy CS13 (tackling climate change) of the London Borough of Camden Local Development Framework Core Strategy and DP22 (sustainable design and construction) of the London Borough of Camden Local Development Framework Development Policies.*

10. *The proposed development, in the absence of a legal agreement securing a sustainable energy strategy, would fail to take sufficient measures to minimise the effects of, and adapt to, climate change contrary to policies CS13 (tackling climate change) and DP22 (sustainable design and construction) of the London Borough of Camden Local Development Framework Core Strategy and Development Policies.*

8. LEGAL COMMENTS

8.1 Members are referred to the note from the Legal Division at the start of the Agenda.