| <b>Delegated Re</b>  | port Ana   | Analysis sheet |                                    | Expiry Date                      |               | 014 |  |
|--|--|----------------|------------------------------------|----------------------------------|---------------|-----|--|
|  | N/A  |                |                                    | Consultatio                      | 24/07/20      | 014 |  |
| Officer Application Number(s)  |  |                |                                    |                                  |               |     |  |
| Alex McDougall   |  |                |                                    | 1. 2014/2303/P<br>2. 2014/2586/L |               |     |  |
| Application Address  |  |                | Drawing Numb                       | Drawing Numbers                  |               |     |  |
| 17-18 Upper Woburn Place<br>London<br>WC1H 0HT   |  |                | Refer to draft de                  | Refer to draft decision notices. |               |     |  |
| PO 3/4 Area Team Signature C&UD  |  |                | Authorised Off                     | Authorised Officer Signature     |               |     |  |
|  |  |                |                                    |                                  |               |     |  |
| Proposals  |  |                |                                    |                                  |               |     |  |
| <ol> <li>Erection of mansard roof extension to rear extension comprising eight additional hotel<br/>guestrooms (Use Class C1), rear roof extension to principal building comprising means of<br/>escape and alterations to existing roof plant enclosure.</li> <li>Erection of mansard roof extension to rear extension comprising eight additional hotel<br/>guestrooms (Use Class C1), rear roof extension to principal building comprising means of<br/>escape, alterations to existing roof plant enclosure and internal changes to the layout of the<br/>building.</li> </ol> |  |                |                                    |                                  |               |     |  |
| Recommendation(s):   | nendation(s):<br>1. Refuse Planning Permission<br>2. Refuse Listed Building Consent  |                |                                    |                                  |               |     |  |
| Application Type:  | <ol> <li>Full Planning Permission</li> <li>Listed Building Consent</li> </ol>  |                |                                    |                                  |               |     |  |
| Conditions or Reasons<br>for Refusal:<br>Informatives:   | Refer to Draft Decision Notices  |                |                                    |                                  |               |     |  |
| Consultations  |  |                |                                    |                                  |               |     |  |
| Adjoining Occupiers:   | No. notified   | 7              | No. of responses<br>No. electronic | 0<br>0 No.                       | of objections | 0   |  |
| Summary of consultation responses:   | Site Notice: 27/06/14 – 18/07/14. Press Notice: 03/07/14 – 24/07/14.<br>No response received.  |                |                                    |                                  |               |     |  |
| Bloomsbury CAAC<br>comments:   | The Bloomsbury CAAC requested an internal site visit. This was not considered to be appropriate and the chair was informed as such. No further comments were received. |                |                                    |                                  |               |     |  |
| English Heritage:  | Authorisation to determine application in line with local conservation advice.   |                |                                    |                                  |               |     |  |
| Site Description   |  |                |                                    |                                  |               |     |  |
| The site is occupied by a Grade II listed corner building formerly a row of terrace houses on Upper  |  |                |                                    |                                  |               |     |  |

Woburn and Endsleigh Gardens. The buildings date from 1824-25 by Thomas Cubitt. The buildings are of 4 storeys with mansard attic and basement, constructed of yellow stock brick with stucco ground floors. The building has a large 4 storey plus mansard rear extension. The site is located in the Bloomsbury Conservation Area.

#### **Relevant History**

17-18 Upper Woburn Street (application site)

2014/1177/L: Internal alterations to include the creation of 6 no. additional guest bedrooms (inc 1no. disabled room) and gym/treatment area to ground floor level, with function/office space at basement level with associated rooflights. Granted 03/06/2014.

8800323: Refurbishment and extension of existing hotel including the erection of an extended rear bedroom wing and conservatory and the formation of a conference suite as shown on drawing numbers 3097/01 10-19 21A 22A 30B 31C 32B 33B 34 35 36 37C 38 39B & 41A revised by letters dated 11th August 1988 and 26<sup>th</sup> September 1988, Planning Permission issued 16<sup>th</sup> Nov. 1988

HB470: At Cora Holtel, Upper Woburn Place, W.C.1 the following:- (a) The formation of extensions at the rear by the infilling of existing areas, to provide additional carpet storage space at basement level, and hotel offices at ground floor level. (b) The formation of a temporary entrance on the Upper Woburn Place Frontage by the provision of a pedestrian bridge from the pavement to an enlarged window opening. (c) Internal works, including re-arrangement of partitions in connection with modernising entrance hall on the ground floor, Listed Building Consent issued 31<sup>st</sup> July 1973

HB925: The continuation of the mansard roof along the Upper Woburn Place elevation of the Cora Hotel, Upper Woburn Place, W.C.1. to link up with the existing by the provision of 2 additional bedrooms and bathrooms at fourth floor level Listed Building Consent issued 10<sup>th</sup> June 1971.

L13/27/B/10177: The erection of a two storey block to provide additional bedrooms and bathrooms over the winter Garden at the Cora Hotel, Upper Woburn Place, WC1 Conditional Consent issued 31<sup>st</sup> March 1971.

#### **Relevant policies**

National Planning Policy Framework 2012 National Planning Practice Guidance

#### London Plan 2011

#### Camden LDF Core Strategy 2010

- CS1 Distribution of growth
- CS2 Growth areas
- CS5 Managing the impact of growth and development
- CS7 Promoting Camden's centres and shops
- CS8 Promoting a successful and inclusive Camden economy
- CS9 Achieving a successful Central London
- CS11 Promoting sustainable and efficient travel
- CS13 Tackling climate change through promoting higher environmental standards
- CS14 Promoting high quality places and conserving our heritage
- CS16 Improving Camden's health and well-being
- CS19 Delivering and monitoring the Core Strategy

## **Camden Development Policies 2010**

DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

DP13 Employment sites and premises

DP14 Tourism development and visitor accommodation

DP16 The transport implications of development

DP17 Walking, cycling and public transport

DP18 Parking standards and limiting the availability of car parking

DP22 Promoting sustainable design and construction

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

DP32 Air quality and Camden's Clear Zone

## Camden Planning Guidance (updated 2013)

CPG1 Design CPG3 Sustainability CPG5 Town Centres, Retail and Employment CPG6 Amenity CPG7 Transport CPG8 Planning Obligations

# Bloomsbury Conservation Area Appraisal and Management Strategy

#### Assessment

1. Detailed Description of Proposed Development

1.1. The following internal alterations are proposed:

• An existing standard hotel room on the first floor would be converted into a wheelchair accessible room. This element will require small change to non-original walls and doors.

1.2. The following external works are proposed:

- Erection of a fifth floor roof extension to the rear extension. The extension would primarily extend the existing mansard up a second storey. The extension would have dimensions: 16.0m 19.1m (depth) x 3.2m 17.3m (width) x 2.9m 3.2m (height). The extension would have a net internal floor area of 198sqm. The extension would include 8 new double bed guest rooms of varying sizes.
- Erection of a fifth floor roof extension to the south-western side of the primary building. The extension would primarily extend the existing mansard up a second storey. The extension would have dimensions: 5.6m (depth) x 3.2m (width) x 2.8m (height). The purpose of this extension is to provide a secondary means of emergency egress from the roof level.
- Alteration to existing roof plant enclosure. The enclosure would be of the same width, decrease in depth from 5.3m to 4.7m and the height would change from a consistent 3.7m to 3.1m – 4.3m above roof level.
- 1.3. During the course of assessment the Applicant submitted amended drawings reducing the height of the altered roof plant enclosure.
- 2. Principle of Development

2.1. Mixed Use

Camden LDF Policy DP1 requires that where additional floor space exceeds 200sqm that up to 50% of that additional floorspace be housing. In this case the proposal would result in an additional 198sqm of floorspace and does not trigger the housing requirement in DP1.

While the current proposal does not trigger housing requirements any future extensions would likely trigger the threshold. As such it is recommended that any approval be subject to a legal agreement requiring that a contribution to housing be made if the GEA increases by 2sqm or more (to a total uplift of at least 200sqm). The actual figure for the contribution would be calculated based on 50% of the total resultant GEA uplift.

## 2.2. Additional Hotel Rooms

There is no objection in principle to an intensified hotel use in this location for the following reasons:

- The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The proposal would help to achieve this goal.
- Local Planning Policy, including CS1 'Distribution of Growth' and DP14 'Tourism Development and Visitor Accommodation' identify the area as a suitable place for hotel accommodation.
- The hotel would contribute to a successful and vibrant centre with a use that provides variety and choice and supports the continued growth of the sector and related employment in accordance with policies CS7 and CS8.
- The proposal would result in additional employment opportunities for local residents.

# 2.3. Roof Extension

Camden Planning Guidance 1 'Design' provides guidance on the situations where roof extensions would be considered acceptable in principle. CPG1 states that roof additions are likely to be unacceptable in the following relevant circumstances:

• Buildings which already have an additional storey or mansard.

The building already has a mansard roof extension.

• The building is designed as a complete composition where its architectural style would be undermined by any addition at roof level;

The building, including the rear extension, is designed as a complete composition which would be unbalances by an additional storey to the rear.

• Where the scale and proportions of the building would be overwhelmed by additional extension.

An additional level to the rear would overwhelm the principle building. Rear extensions should be subservient to the host building.

For the reasons listed above a roof extension to the building is considered to be unacceptable in principle.

2.4. Alterations and additions

The other alterations and additions to the building are considered to be acceptable in principle

subject to a detailed assessment on the following grounds:

- a) Listed Building, Conservation Area and Design
- b) Residential Amenity
- c) Standard of Accommodation
- d) Transport, Traffic & Parking
- e) Sustainability
- f) Access
- g) Refuse & Recycling

### 3. Listed Building, Conservation Area and Design

### 3.1. Internal alterations

The proposed internal alterations are considered to be of an acceptable design, and have an acceptable impact on the listed building, as the works would impact only non-original fabric. Furthermore the proposal would provide an additional wheelchair accessible room, a positive goal considered to justify the means.

### 3.2. Roof extensions

The proposed roof extensions are considered to be of an unacceptable design, detrimental to the appearance of the listed building and fail to preserve or enhance the character of the conservation area, for the following reasons:

- a) The proposal would result in the rear extension being higher than the primary building, contrary to Camden Planning Guidance, which requires that rear extensions be subservient to the primary building and English Heritage's guidance *'London Terrace houses 1660-1860'* which notes that extensions should never dominate the parent building in bulk, scale, materials or design.
- b) The proposed additional storey, by replicating the mansard profile of the existing 4th floor will create a double tier of dormers which are not in keeping with the age and character of this early 19th century building. These will appear particularly discordant given that the rear addition has been designed with a single storey mansard that terminates the façade in a traditional manner and that follows the front façade.
- c) Part of the roof extension would not follow the mansard style of the existing proposal by erecting a vertical slate tile clad wall, not characteristic of such 19<sup>th</sup> century buildings.
- d) The proposed small roof extension to the primary building would appear discordant as a stand-alone element, not characteristic of such 19<sup>th</sup> century buildings.

## 3.3. Plant room alterations

The proposed altered plant room is considered to be of an acceptable design, have an acceptable impact on the appearance of the listed building and preserve and enhance the character of the conservation area as the overall increase in setback and lowering of most of the structure would make up for the increase in height of parts of the structure, ensuring it would be no more visible from street level than the existing structure.

#### 4. Residential Amenity

## 4.1. Roof Extensions and Plant Room Alterations

The proposed roof extensions and plant room extension are considered to have an acceptable

impact on the amenity of adjoining and nearby properties for the following reasons:

- a) Due to the orientation of the site and the separation from adjoining buildings the proposed works are not considered likely to result in unacceptable overlooking, loss of outlook, sense of enclosure or the like.
- b) Camden Planning Guidance 6 'Amenity' states that an 18m separation is usually sufficient to ensure privacy between buildings. The proposal would be more than 18m from adjoining and nearby windows and as such is considered to maintain privacy.
- c) The use of the extension is not considered to unreasonably add to noise or general disturbance in the area.

For the reasons listed above the proposal is considered to be in accordance with Development Policy DP26 of the London Borough of Camden's Local Development Framework.

### 5. Standard of Accommodation

The proposal is considered to provide an adequate standard of accommodation for the following reasons:

- a) The proposed rooms would receive an adequate level of light and outlook.
- b) While specific size standards for such accommodation are not included in Council Planning Policy the proposed rooms are considered to be of an adequate size for their intended purpose.
- c) At 2.5m, the proposed rooms have an adequate floor to ceiling height in keeping with the requirements of CPG2.

### 6. Transport, Traffic & Car Parking

#### 6.1. Car Parking

The site is located within the Kings Cross / Bloomsbury & Fitzrovia Controlled Parking Zone (CPZ). Council data suggests that the local CPZ is exceeding capacity at a rate of 1.065 permits per space. Further permits would result in an increase in vehicles roaming for spaces, leading to congestion. As such it is considered that the proposal should be designated as 'car-free' in keeping with the requirements of DP18. The Applicant has not entered into such an agreement and as such the proposal is considered to be unacceptable in this regard.

## 6.2. Cycle Parking

The proposal results in an additional 198sqm of floor space. This amount of floorspace does not exceed the minimum standard for additional cycle parking.

#### 6.3. Servicing

The increase in the number of hotel rooms, relative to the size of the existing hotel, is not considered to result in a material change to the existing servicing requirements. As such a servicing management plan is not considered to be necessary in this case.

#### 6.4. Construction

There is no on-site parking or servicing area and as such construction vehicles would need to park/wait on the street. Based on the scale of the works and the location of the site in central London, the construction activities are likely to have a significant impact on the traffic and

transport network. Construction of the development should be planned and managed in order to minimise any impact on the adjoining road network and the significant public and visitor amenity provided by the surrounding area. As such a Construction Management Plan (CMP) is considered to be required. Given that the construction would have impacts outside of the 'redline' boundary of the site it is considered that such a CMP should be secured via legal agreement. The Applicant has not entered into such an agreement and as such the proposal is considered to be unacceptable in this regard.

# 7. Sustainability

LDF Policy DP22 requires developments to incorporate sustainable design and construction measures. The proposed extensions would be built to modern insulation and energy use requirements. Given the proposal relates to a listed building, in which there is limited scope to increase the efficiency of the existing building, the proposal is considered to adequately respond to the issue of sustainability.

## 8. Access

The proposal is considered to adequately respond to the issue of access for the following reasons:

- a) While none of the proposed rooms would be wheelchair accessible the proposal includes conversion of an existing first floor room to a wheelchair accessible room. This is considered to be in keeping with the requirement that 1 in 10 rooms be wheelchair accessible.
- b) All proposed hotel rooms would be required to comply with relevant Building Regulations.
- c) All additional hotel rooms would be accessible by lift.

#### 9. Refuse & Recycling

There are existing refuse and recycling arrangements for the site. As it is commercially run, the operator of the hotel would arrange additional collections if required. The proposals are therefore considered to be acceptable in this regard.

#### 10. Community Infrastructure Levy

The proposed floor space would be liable to the Mayor's Community Infrastructure Levy (CIL). The contribution for developments within Camden is set at £50 per square metre. As such this development would be liable for a contribution of £9,900.00 (198sq.m x £50). If consent were to be granted a standard informative would be attached to the decision notice drawing CIL liability to the Applicant's attention.

#### 11. Recommendation

Refuse planning permission and listed building consent