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# Planning Statement

ROYAL NATIONAL HOTEL, "POPPADOM EXPRESS",  
40-42 WOBURN PLACE, WC1H 0JX

DECEMBER 2015

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COLLIERS INTERNATIONAL

ON BEHALF OF

IMPERIAL HOTELS GROUP

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**COLLIERS INTERNATIONAL PROPERTY CONSULTANTS LIMITED**

Company registered in England and Wales no. 7996509

Registered office:

50 George Street

London W1U 7GA

Tel: +44 20 7935 4499

[www.colliers.com/uk](http://www.colliers.com/uk)

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# 1 INTRODUCTION

## 1.1 THE PROPOSED DEVELOPMENT

This Statement has been prepared by Colliers International on behalf of the Imperial Hotels Group with regard to their ancillary restaurant property at 40-42 Woburn Place, WC1H 0JX. The property currently trades as “Poppadom Express” and serves both guests of the Royal National Hotel and visiting members of the public.

The applicant operates a large estate of hotel and mixed use ground floor accommodation focussed on Southampton Row/Russell Square/Woburn Place/Tavistock Square and Upper Woburn Place (i.e. the A4200). The portfolio includes the County; Tavistock, Royal National; Morton; President; Imperial and Bedford hotels providing in excess of 2500 rooms.

The Royal National’s website describes the facilities at the hotel as:

*“The award-winning Royal National has a buzz and a bustle reflecting the liveliness of London. Guests can sample authentic curry at the Indian restaurant, homemade stone baked pizzas in Blooms pizza cafe, fish and chips in the London Pub beer garden, dim sum at the Chinese restaurant and draft beer in the new Meeting Place with Sky Sports. There is an ATM, bureau de change and shops in the foyer, as well as extensive meeting and events facilities.” (our emphasis)*

(<https://www.imperialhotels.co.uk/en/royal-national?&&gclid=CKadjZnCuMkCFUEcGwodwmwDtw>)

The intention is to improve the quality of the Class A3 “Restaurants and Café” operation so that it provides a higher quality service to guests and the local community. It is considered that creating a unit which can be operated by a specialist restaurateur will achieve this objective and will make a greater contribution to the vitality of the area.

As an existing operation, the unit already benefits from kitchen extracts and air conditioning and there is no intention to alter these facilities to accommodate the independent use – they are suitable to continue to operate as existing. Similarly, there is no intention to make alterations to the unit’s frontage or signage at this time. There will be internal alterations with respect to linkages between the hotel and the restaurant but these do not require planning permission.

## 1.2 PURPOSE OF STATEMENT

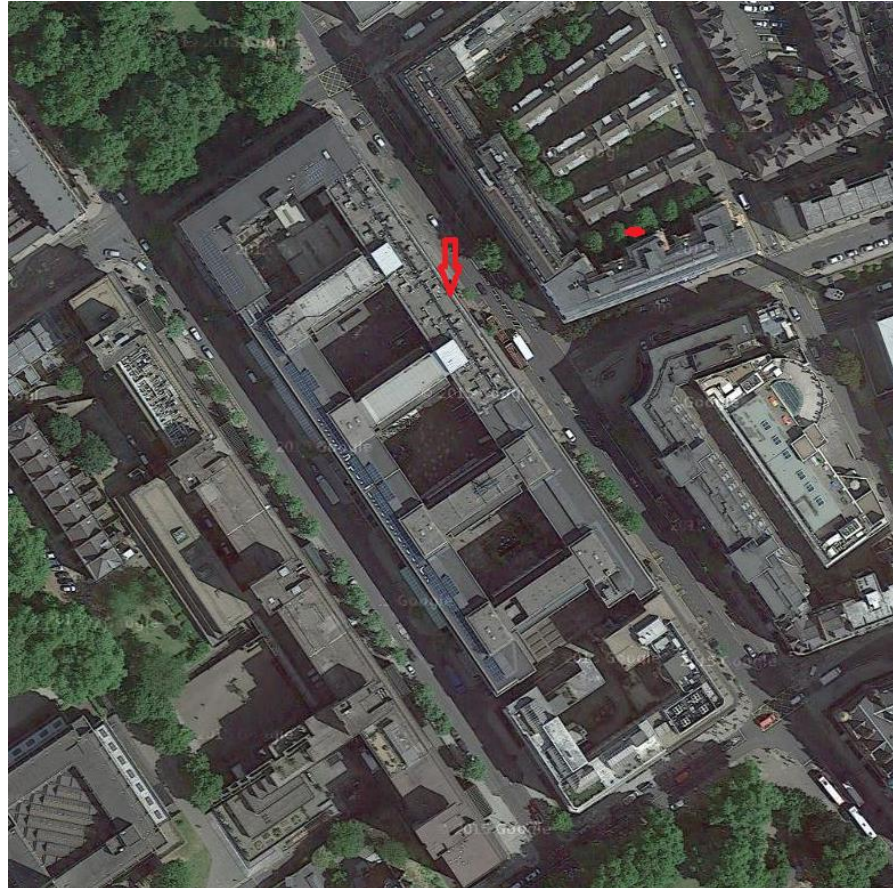
This Statement assesses the proposed development in the light of relevant planning policy and guidance and the constraints which affect the site. The report is structured such that it establishes this position through the following sections:

- Section 2 - consideration of the site's location and context;
- Section 3 - an analysis of the property's planning history;
- Section 4 - identification of the relevant adopted and emerging development plan policies;
- Section 5 - assessment of the proposal against planning policies; and
- Section 6 - conclusions.

This Statement should be read in conjunction with the other application documents submitted in support of this application which are listed on the covering letter.

## 2 SITE CONTEXT

The application site is situated between Russell Square and Tavistock Square in the London Borough of Camden. The property fronts the western side of Woburn Place about 50m south of Tavistock Square.



**Figure 2.1: Site Location Plan**

It forms part of the Royal National Hotel, a large seven storey, 1630 room, hotel lying between Woburn Place and Bedford Way. The hotel is arranged around central courtyards which provide a mix of guest facilities and service accommodation. It is Central London's largest hotel.

## 2.1 EXISTING USE

The Poppadom Express is situated at ground floor level and extends to about 320 sqm. It has an 18m frontage to Woburn Place which is the equivalent of three shop widths. The shopfront is glazed with metal framing painted oxblood red with a single, central, customer entrance with sliding folding doors on each side. Three pull out blinds provide sun screening along this entire frontage.

There is a single yellow line along Woburn Place where parking is prevented between 7.00 am – 7.00 pm Monday – Friday and 8.30am – 1.30pm on Saturdays. There are no restrictions on loading or unloading.

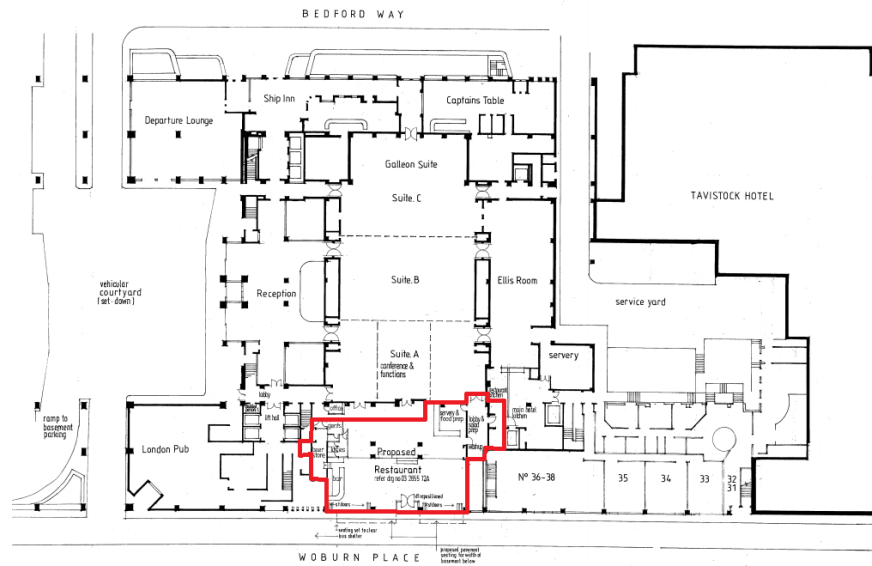


**Figure 2.2: Poppadom Express - Woburn Place Frontage**

The unit also has a direct entrance from the hotel reception area to the rear. This internal access is open whilst the unit trades. Current opening hours are noon to 11.30 pm but the opening hours of the proposed occupier are not known.

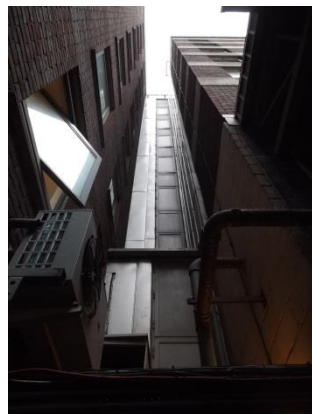
Figure 2.3 shows the location of the unit in the context of the hotel. A new internal fire corridor to provide a means of escape for the conference facilities to the rear will be constructed. These internal works do not require planning permission.





**Figure 2.3: Proposed restaurant in hotel context**

The kitchen area already benefits from extract ducting which runs up the rear of the building and exhausts at a high level. Figure 2.4 shows the existing duct. This application does not therefore include any proposals for extract ducting.



**Figure 2.4: Existing kitchen extract duct to the rear**

Similarly, the unit already benefits from air conditioning with the condensers being located in the underground car park. If any additional condensers are required these will similarly be provided in the car park.

## 2.2 SURROUNDING CHARACTER

The property is located within a highly accessible location achieving a PTAL rating of 6b, the highest possible rating. Russell Square tube station (Piccadilly line) is situated 200m to the south whilst the rail and tube (Northern and Victoria lines) services of Euston station are 900m to the north. There are numerous bus routes along Woburn Place providing more than 130 buses per hour, with the closest northbound stop being situated outside the unit and the closest southbound about 30m to the south.

Woburn Place is a focus of hotel accommodation with the Tavistock Hotel being situated immediately adjacent to the north. Directly opposite is 19-29 Woburn Place which provides student accommodation, with Russell Court, a large residential block to the south. The general location is popular with visitors because it is within walking distance of the British Museum, Covent Garden and 'Theatreland'. The British Museum dominates the area and is one of London's top tourist attractions.

Bloomsbury is also a focus of education being home to four colleges of the University of London: Birkbeck, the London School of Hygiene and Tropical Medicine, the Royal Veterinary College and the School of Oriental and African Studies. There is also a wide range of specialist student accommodation spread throughout the area.

There is a growing mix of active uses at ground floor including, in addition to hotels, restaurants, a public house, wine bar, coffee shop, shops, car hire, banking, other financial services and a gym. Coupled with traffic volumes, these all contribute to a bustling and busy Central London character and provide services to the large resident and visiting population and to those in transit.

## 2.3 HERITAGE DESIGNATIONS

The property falls within the Bloomsbury Conservation Area (sub area 6), the extent of which is shown in Figure 2.5. The location of the site is identified with a red arrow. The Royal National Hotel is shown as a neutral building in the conservation area.

Figure 2.5 also shows the location of listed buildings within the conservation area. The application premises are not listed nor are the buildings on the opposite side of Woburn Place. Whilst the Institute of

Education, Clore Institute of Advanced Legal Studies and accommodation for University College, situated on the western side of Bedford Way are listed (Grade II\*), these properties will not be affected by the proposed development.

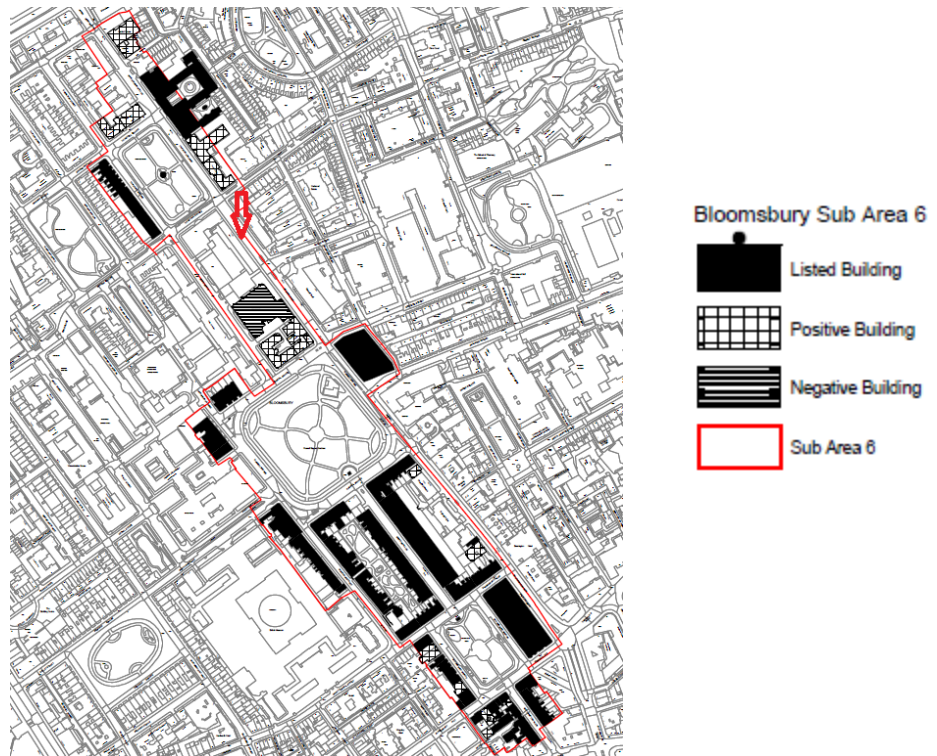


Figure 2.5: Bloomsbury Conservation Area

## 3 PLANNING HISTORY

Colliers International have reviewed the site's online planning history register maintained by the LB of Camden, which comprises a record of planning applications, decisions and enforcement actions from 1980 onwards. The content and accuracy of the planning register is the responsibility of the Council, but is considered sufficient to reach accurate conclusions in respect of the property.

### 3.1 ONLINE RECORDS

The online archive is unclear on the history of the application property and consequently permission is sought to provide absolute clarity on the use to assist with leasing the premises to an independent operator.

There are no decisions relating specifically to the application premises.

## 4 PLANNING POLICY

This section identifies the planning policy context against which applications within the LB Camden will be determined, with regard to both adopted and emerging policy. Key material considerations are also identified.

The relevant policies, together with an analysis of how the proposed scheme responds to these policies, are set out in Section 5.

### 4.1 PLANNING POLICY CONTEXT

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires that decisions made under the Planning Acts are determined in accordance with the development plan unless other material considerations indicate otherwise.

#### National Planning Policy

The National Planning Policy Framework (NPPF) was published in March 2012. It replaced the suite of previous Government guidance comprising Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) with a single consolidated document. The NPPF provides the framework within which Local Authorities should prepare policy and determine applications, including further definition of sustainable development. It is therefore an essential decision-making tool. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking (paragraph 14). This paragraph goes on to state that:

*“For decision taking this means:*

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

- *specific policies in this Framework indicate development should be restricted.”*

In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is also a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of practice guidance at the national level.

### Local Development Plan

The relevant development plan in this case comprises:

- Further Alterations to the London Plan - adopted March 2015;
- LB Camden Core Strategy – adopted 2010;
- LB Camden Development Policies – adopted 2010; and
- LB Camden Site Allocations – adopted 2013.

There is no neighbourhood planning area designated for this area.

## 4.2 THE LONDON PLAN

Policy 2.15 supports the provision of a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan.

Policy 4.5 applies to London's visitor infrastructure and strategically the visitor economy should be supported. Development decisions should not result in the loss of strategic hotel capacity.

Policy 4.7 applies a town centre first approach to leisure development and requires an impact assessment.

Policy 4.8 requires a proactive approach to planning for retail and related services. It requires local policies to provide a framework for maintaining, managing and enhancing local and neighbourhood shopping which provide local services. The supporting justification acknowledges that larger centres are appropriate to accommodate much of the comparison goods growth and smaller scale centres convenience shopping growth, it is

important to provide local shops and services to secure lifetime neighbourhoods (paragraph 4.48).

Policy 7.1 deals with place shaping and the creation of lifetime neighbourhoods. It states that such neighbourhoods should include places of work and leisure and should be designed to meet the needs of the community at all stages of people's lives.

### 4.3 LOCAL CAMDEN POLICIES

The extract from Camden's Planning Policy Map below confirms that the site is located within the Bloomsbury Conservation Area and also within the Central London Area. The property lies outside Primrose Hill to St Paul's Cathedral Lateral Assessment Area but this is not relevant to these proposals. The property is also located within the Core Activities Zone (CAZ).

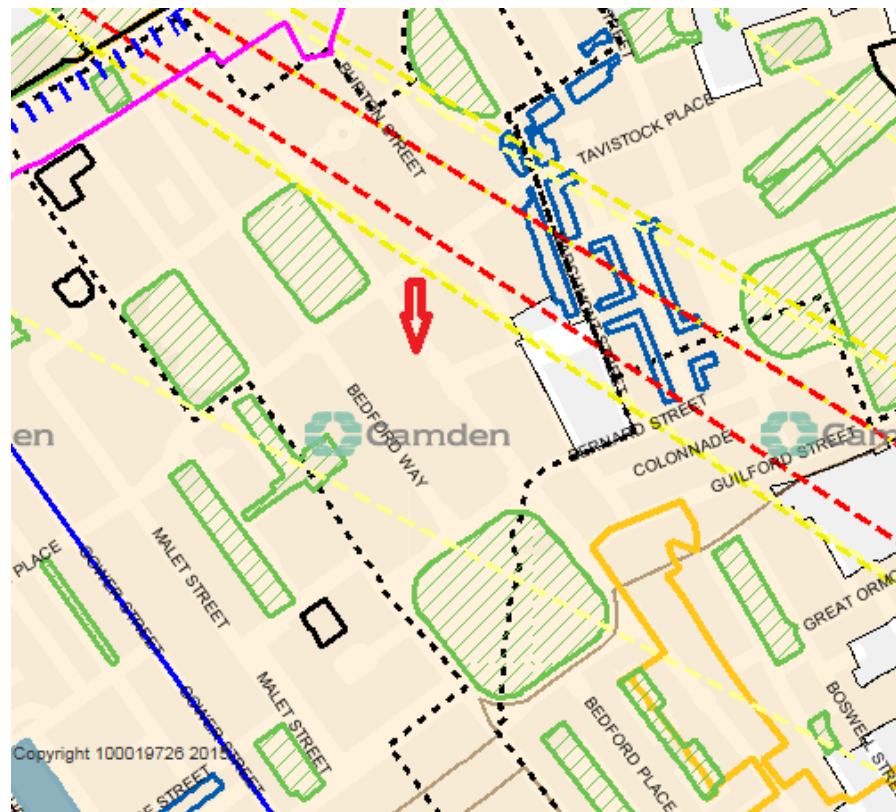


Figure 4.1: Proposals Map Extract

**i) Core Strategy**

Policy CS1 sets out the strategy for growth, focussing it in the most suitable locations, particularly at King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead. Elsewhere it will be promoted at highly accessible locations. Camden will seek the most efficient use of land and buildings, including a mix of uses. Policy CS3 defines 'highly accessible' areas as including Central London outside of the growth areas.

Policy CS9 seeks to achieve a successful Central London. The policy outlines the Council's intention to preserve the area's historic environment, support Central London as a focus for shops and other uses and manage both the location and concentration of food, drink and entertainment uses. The objective is to ensure they contribute to vibrancy in a way that does not harm the quality of life for local people or the character of the area (paragraph 9.7).

**ii) Development Policies Document**

Policy DP14 of the Development Policies Document seeks to protect existing visitor accommodation in appropriate locations; Central London is considered an appropriate location (paragraph 14.6).

The proposed restaurant is defined as a town centre use and is therefore considered as part of Development Policy DP12. The policy states that the Council will ensure that the development of food, drink and other town centre uses does not cause harm to the character and function of the local area or the amenity of neighbours. This is to be achieved through consideration of the cumulative impact of food, drink and entertainment uses, the impact of the unit on nearby residential uses and amenity and the fumes likely to be generated and how they will be ventilated. Further, the policy states that planning conditions may be used to address issues of hours of operation, fumes and plant siting and the storage and disposal of refuse and litter.

Camden's Development Policies seek to protect amenity within Camden. Policy DP26 will seek to prevent harm to amenity through consideration of



noise levels and odour and fumes. Policy DP28 seeks to ensure the control of noise and vibration stating that permission will not be granted where development is likely to generate noise pollution.

**iii) Site Allocations Document**

This document describes Bloomsbury as an area characterised by Georgian squares and residences, many of which are now in commercial use. The policy approach is in line with the Core Strategy aspirations for Central London and seeks:

“a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street”.

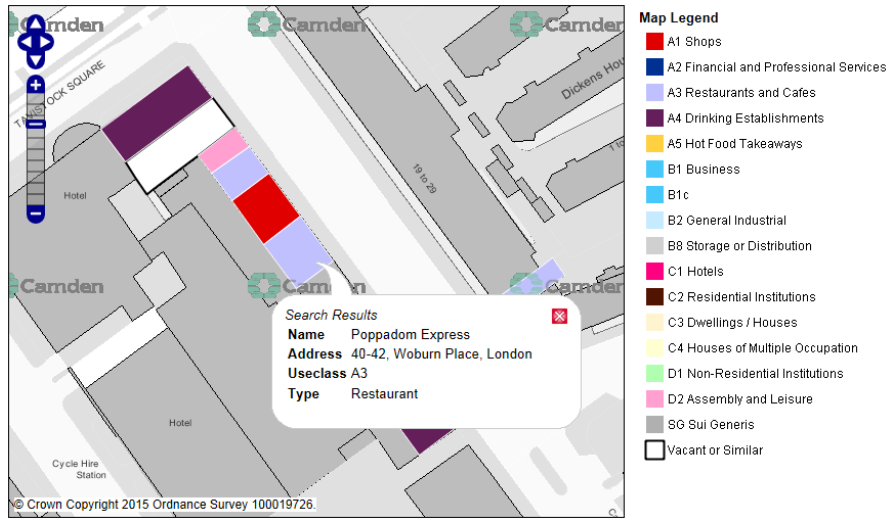
There are no site allocations close to the site.

**iv) Draft Camden Local Plan 2015**

The emerging development plan for the area is contained within the Draft Camden Local Plan which is currently at initial consultation stage. This document sets out the strategic policies for Camden and repeats the policies of relevance to this application outlined in the existing Core Strategy and Development Policies Document. No minor amendments are deemed to be of significance to this application.

**v) Camden Retail Survey 2015**

Camden’s Retail Survey 2015 records street uses throughout the borough. The entry for Poppadom Express records it as a Class A3 restaurant. Figure 4.2 shows the interactive map survey for the application premises.



**Figure 4.2: Camden Retail Survey 2015**

## 5 PLANNING ASSESSMENT

This section provides an assessment of specific considerations in respect of the proposed development. In doing so, it draws upon the key issues identified in the review of policy and assesses the scheme against the following elements:

- Assessment against relevant policy context;
- Loss of Class C1 hotel use;
- Proposed Class A3 use;
- Sequential Assessment;
- Operational considerations;
  - Opening hours
  - Servicing
  - Waste management
  - Plant
  - Fire escape
  - Design

Following a review of the planning policy context it is considered that the primary consideration in the determination of this application is the loss of hotel floor space and the proposition of a Class A3 use. Each aspect is discussed below:

### 5.1 ASSESSMENT AGAINST RELEVANT POLICY CONTEXT

The local policy approach supports the hotel industry across London and also the provision of local services. The proposed development accords with both of these objectives.

Under both national and local policy there needs to be a sequential test assessment for proposed main town centre uses outside existing centres but this need only be proportionate to the scale of development proposed. This assessment is undertaken below.

## 5.2 LOSS OF CLASS C1 HOTEL USE

The proposed unit currently exists as an ancillary restaurant within the floor plate of the hotel. It is advertised as part of the hotel catering offer and has a direct access from the hotel reception.

Whilst currently part of the hotel, the unit provides no contribution to bedroom space and will continue to be available for use by hotel guests due to its close proximity. The proposal will therefore result in no net loss of visitor accommodation floor space or affect the on-going operations of the hotel.

## 5.3 PROPOSED CLASS A3 USE

The unit is situated within an existing commercial frontage and is currently operational as an ancillary restaurant; it is also open to visiting members of the public. Indeed, there is already not only an entrance from Woburn Place, but the shop front folds back to present a more welcoming and attractive appearance to passers-by. The retail study already views the unit as a Class A3 use (see Figure 4.2).

The proposal will see the unit operate in a similar manner to as present although internal access from the hotel will no longer be possible for the public. It will continue to provide facilities for both guests and other visitors. The existing air conditioning plant and flue extract will be retained with no requirement to install additional plant or kitchen extracts. There will consequently be no changes to the impact on the local area except from an improvement in quality.

Whilst the closest residential properties are situated on the opposite side of Woburn Place, the road is a busy traffic thoroughfare throughout the day. Traffic noise dominates the local area screening residents from activities at the application site.

The existing flue is at the rear of the hotel and air conditioning plant is within the hotel basement. Nearby residential properties are therefore protected from plant noise by the bulk of the hotel property and traffic noise. The applicant will also wish to ensure that the operation of the restaurant does not harm the amenity of guests.

## 5.4 SEQUENTIAL ASSESSMENT

The application site does not fall within a town centre. The nearest 'centres' are the Central London frontages on Tottenham Court Road, Marylebone Road and High Holborn. There is also a neighbourhood centre on Marchmont Road and the Brunswick Centre.

The intention of the proposed development is to provide a local service aimed at the local tourist trade, residents and businesses. In particular, it remains important for the proposed restaurant to be situated where it can continue to provide facilities to support the operation of the hotel by providing a meal option for guests. The area of search is therefore restricted to where this function can be met.

The Central London frontages are too far away to be able to provide this service. Whilst closer, the neighbourhood centre is also too far away and is out of sight from the hotel making it difficult for guests to find.

There are in any event no suitable units (i.e. of an equivalent size) currently available in the neighbourhood centre. All units are either occupied or let pending occupation. The only unit not currently trading (at 15-17 Brunswick Centre) is leased to Strada Trading and is shortly to be refitted as a different brand under the group's umbrella.

## 5.5 OPERATIONAL CONSIDERATIONS

These considerations relate the characteristics of the physical operation of the proposed restaurant.

- **OPENING HOURS**

The restaurant currently operates from 12:00pm-11:30pm (Monday-Sunday). It is proposed that the unit will continue to operate with the same terminal hour but is likely to open earlier. In the local context, which is dominated by street noise, it is considered that this is acceptable from a planning perspective.

- **SERVICING**

The unit is currently serviced through the rear of the property. This option will still be made available to a future tenant within the communal service area. Alternatively, as an independent unit the restaurant can be serviced through the front entrance in accordance with local loading restrictions. There are no loading restrictions currently in force along Woburn Place.

- **WASTE MANAGEMENT**

Refuse from the unit will be stored within the kitchen; this area is identified on the proposed floor plan. Refuse will then be collected from either the public highway or the communal service area as is the current arrangement.

- **PLANT**

The existing air conditioning units and flue extract will be retained with no additions or alterations.

- **FIRE ESCAPE**

There will be internal alterations to accommodate amended escape routes for the conference facilities to the rear. These internal works do not require planning permission. The restaurant unit will be served through the means of escape onto the street. All travel distances have been confirmed to ensure compliance with fire regulations.

- **DESIGN**

The application only seeks planning permission for change of use. There are no changes proposed to the shopfront or to existing plant/flues. Consequently there are no design implications arising from these proposals.

## 6 SUMMARY AND CONCLUSIONS

This Statement is submitted in support of an application for full planning permission for:

*“Change of use from ancillary hotel restaurant to independent restaurant (Class A3)”*

The property is already in use as a restaurant which is operated as an ancillary part of the Royal National Hotel. It is open to both guests of the hotel and visiting members of the public. From the street, it already appears as an independent restaurant use and is recorded as such in Camden’s retail survey 2015 where it is shown falling in a mixed use frontage.

The purpose of this application is to secure a planning permission which will give comfort to prospective tenants that they can occupy the premises as an independent restaurant operation. This technical change will not require any physical changes to the unit as it already benefits from a high level kitchen extract and air conditioning.

It is expected that a specialist restaurant operator would improve the quality of the food offer, increasing its contribution to the local area. Woburn Place is a mixed use area with the application premises being situated in a commercial frontage. It has a high level of accessibility and is a focus of tourist and student activity, with a large nearby residential population.

In order to be able to continue to serve guests at the hotel, the proposed use has to be in this location. There is in any event no vacant unit available in the nearby neighbourhood centre.

In conclusion, we believe that the proposals are compliant with national and local policy and will make a positive contribution to the character and appearance of the conservation area and to local facilities along Woburn Place without any material harm arising. We consequently believe that planning permission should be granted.



## CONTACT DETAILS

Adam Pyrke MRTPI  
Tel: 020 7344 6544  
[adam.pyrke@colliers.com](mailto:adam.pyrke@colliers.com)

Colliers International  
50 George Street  
London  
W1U 7GA

[www.colliers.com/uk](http://www.colliers.com/uk)

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