



Planning Statement

BEDFORD HOTEL, 83-95 SOUTHAMPTON ROW,
LONDON WC1B 4HD

MARCH 2016

COLLIERS INTERNATIONAL

ON BEHALF OF

WALDUCK PROPERTIES LIMITED

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1 INTRODUCTION

1.1 THE PROPOSED DEVELOPMENT

This Statement has been prepared by Colliers International on behalf of Walduck Properties Limited with regard to their ancillary café/ restaurant at the Bedford Hotel, 83-95 Southampton Row, WC1B 4HD. The proposed unit currently operates as 'Café London' which forms part of the hotel's catering function.

The proposal seeks to implement a change of use of the hotel's ancillary café/ restaurant to create an independent café/ restaurant unit (flexible Class A1/ Class A3 use) which will operate independently from the hotel.

1.2 PURPOSE OF STATEMENT

This Statement assesses the proposed development in light of relevant planning policy, guidance and other material considerations. The report is structured such that it establishes this position through the following sections:

- Section 2 - consideration of the site 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 forms part of the Bedford Hotel, a seven storey hotel in the London Borough of Camden. The property fronts Southampton Row, located to the south of Russell Square, and is set back from the building line to accommodate a drop-off area. The proposed unit is the dominant feature of the ground floor elevation with the hotel entrance located adjacent to the unit.



Figure 2.1: Site Location Plan

2.1 EXISTING USE

The existing hotel café/ restaurant is situated at ground floor level with a small area of outside seating on Southampton Row. The unit is operated as part of the hotel’s catering offer, serving guests of the hotel but also open to visiting members of the public.

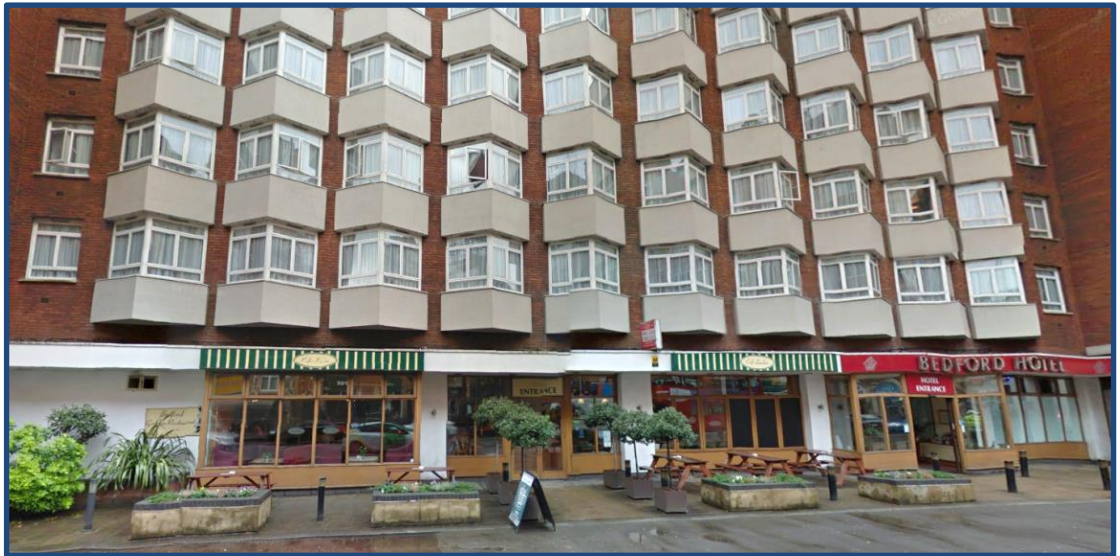


Figure 2.2: Bedford Hotel Southampton Row Frontage

2.2 SURROUNDING CHARACTER

The property is located within a highly accessible location which has a PTAL rating of 6b. Russell Square tube station (Piccadilly line) is situated 300m to the north, Holborn tube station is located 500m to the south, whilst the rail and tube (Northern and Victoria lines) services of Euston station are approximately 1km to the north. There are also numerous bus routes along Southampton Row.

There is a mix of active uses at ground floor level in the surrounding area, including hotels, shops, restaurants and cafes.

2.3 HERITAGE DESIGNATIONS

The property falls within the Bloomsbury Conservation Area (sub area 6), the extent of which is shown in Figure 2.3. The location of the site is identified with a red arrow. The Bedford Hotel is shown as a neutral building in the conservation area.

Figures 2.3 and 2.4 show the location of listed buildings within the conservation area. The application premises are not listed nor are the buildings on the opposite side of Southampton Row; the buildings on the opposite side of Southampton Row are considered 'positive buildings'.

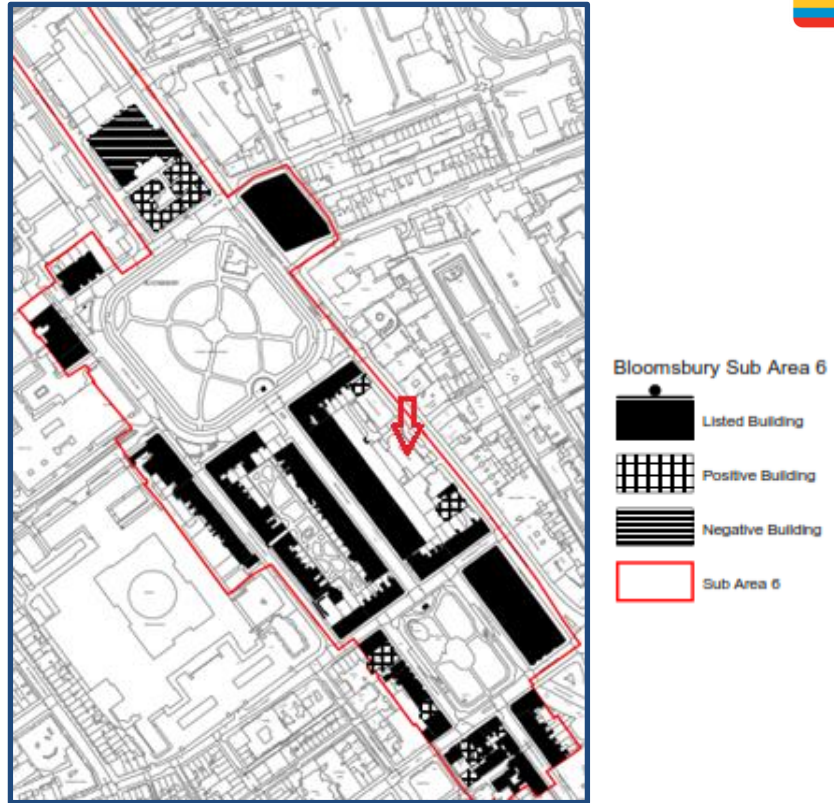


Figure 2.3: Bloomsbury Conservation Area Sub Area 6

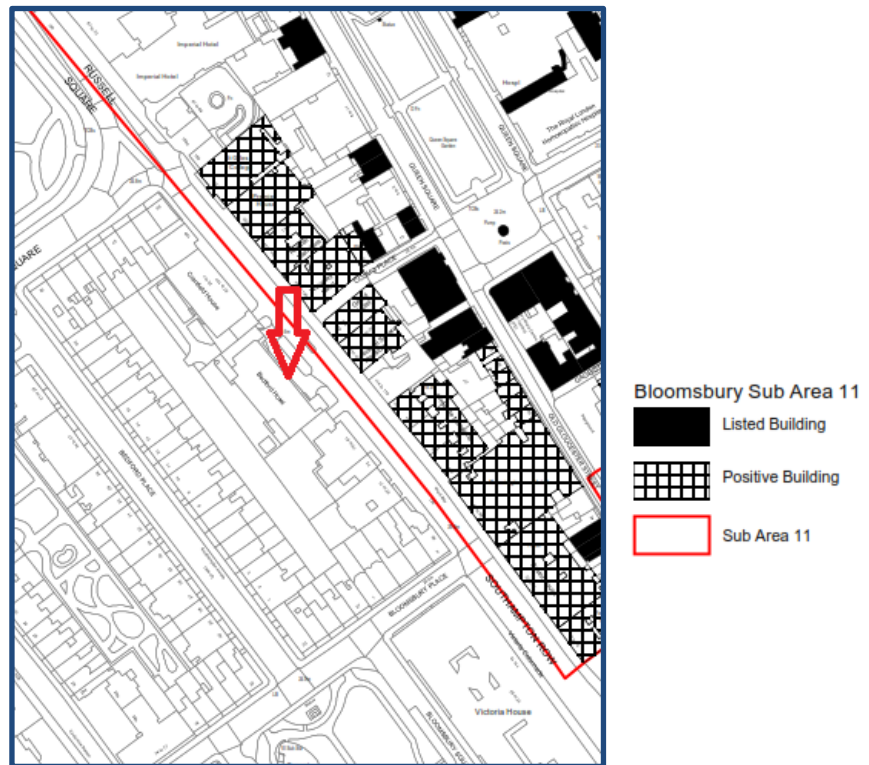


Figure 2.4: Bloomsbury Conservation Area Sub Area 11

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 and decisions. 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 PLANNING HISTORY

A number of planning history records exist for the Bedford Hotel. The planning history indicates that the existing lawful use of the unit at the Bedford Hotel is as 'Hotels' under Class C1 of the *Town and Country Planning (Use Classes) Order 1987* (as amended).

A comprehensive planning history schedule is attached at Appendix 1.

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 (2015);
- LB Camden Core Strategy (2010);
- LB Camden Development Policies (2010); and
- LB Camden Site Allocations (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 states that, 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 retail and 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 in the Bloomsbury Conservation Area and also within the Central London Area. The property is also located within the Central Activities Zone.

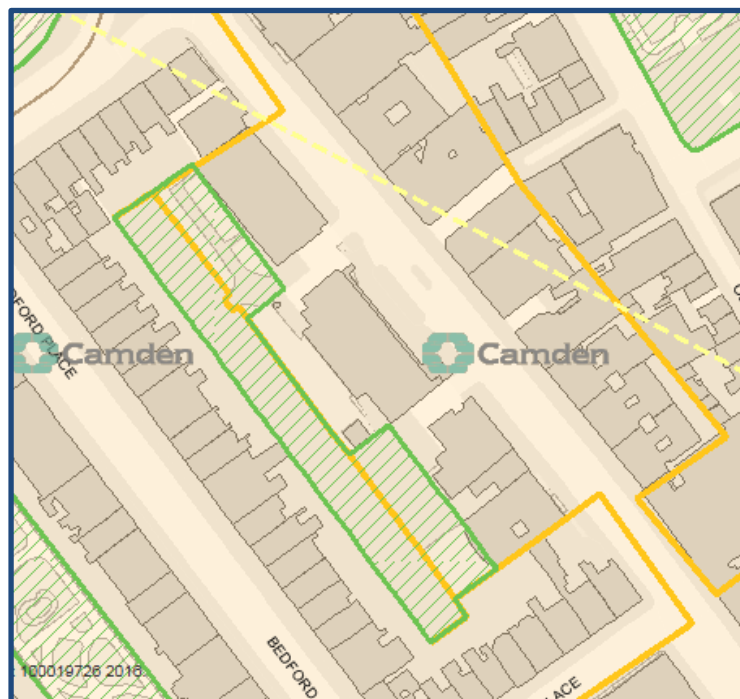


Figure 4.1: Proposals Map Extract

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, in particular Central London and the defined town centres. 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. The defined areas are considered to be suitable for shops, food, drink and entertainment uses amongst other uses.

The Core Strategy seeks to promote a successful and inclusive Camden economy through Policy CS8. The Council will recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

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 use 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.

Policy DP25 outlines the Council's approach to conserving Camden's heritage. The Council will only permit development within a conservation area that preserves and enhances the character and appearance of the area.

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 the Bedford Hotel records it as a Class C1 use. Figure 4.2 shows the interactive map survey for the application premises.

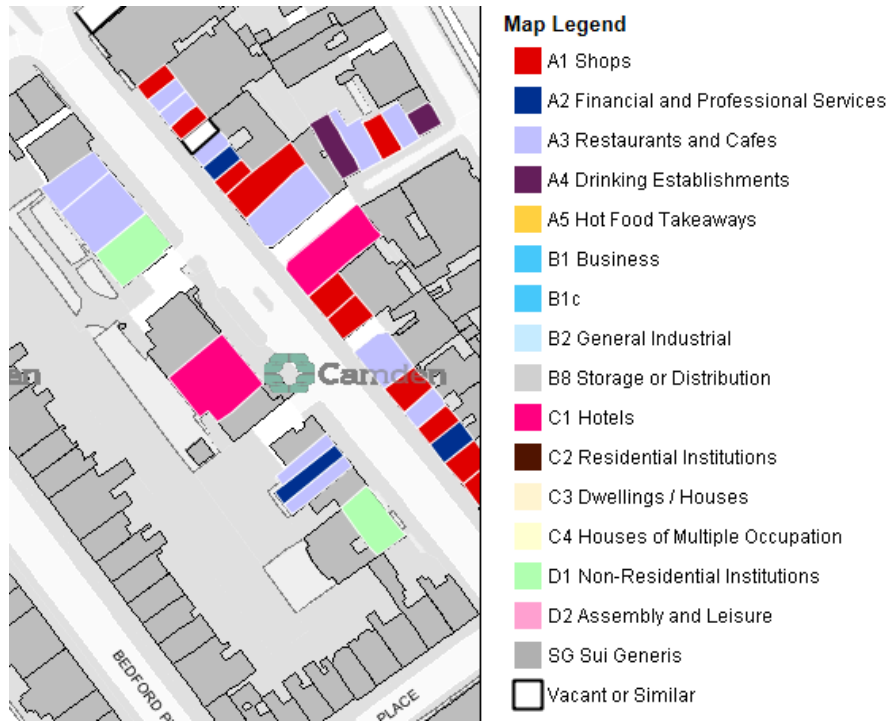


Figure 4.2: Camden Retail Survey 2015

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:

- Loss of Class C1 use;
- Impact of proposed flexible Class A1 /Class A3 use;
- Sequential Assessment;
- Operational considerations;
 - Opening hours
 - Servicing
 - Waste management
 - Plant
 - Fire escape

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 floorspace and the proposition of a Class A1/ Class A3 use. Each aspect is discussed below:

5.1 LOSS OF CLASS C1 HOTEL USE

The proposed unit currently exists as a café/ restaurant within the ground floor floorplate of the Bedford Hotel. The unit is currently operated as part of the hotel. The unit benefits from direct access from Southampton Row and is also accessible from an internal entrance. This internal entrance will be removed following the change of use of the unit.

In its current use, the unit provides no contribution to bedroom space and will continue to be available to guests of the hotel due to its close proximity. The hotel will continue to provide an internal catering offer through the Garden Restaurant. The proposal will therefore result in no net loss of visitor accommodation floorspace or affect the on-going operations of the hotel.

5.2 PROPOSED CLASS A1 OR CLASS A3 USE

The unit is currently operational as a café/ restaurant and demonstrates an existing entrance facing onto the public highway. The proposal will see the unit operate independently of the hotel with a minor internal alteration to remove access to the hotel through the unit. Whilst part of the hotel, the unit currently operates very similarly to an independent Class A3 unit.

The existing air conditioning plant and flue extract will be retained with no requirement to install additional plant or extracts. The location of the extraction system is outlined on the floor plans submitted as part of this application.

Access to the unit will exist solely from the entrance fronting onto Southampton Row and there will be no impact on residential amenity as a result of the proposal.

5.3 SEQUENTIAL ASSESSMENT

National policy, through the National Planning Policy Framework, requires 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 (Paragraph 24). An assessment relevant to the scale of the proposals is undertaken below.

The Museum Street Central London Area is the closest defined frontage, with the Holborn Central London Frontage also located nearby. The Lambs Conduit Street Neighbourhood Centre is the closest Neighbourhood Centre but this is not located close enough to serve the local trade.

The Museum Street Area defined frontages, along Great Russell Street and Bury Street, are the closest frontages to the proposed unit but are still considered too far away to serve users of the hotel and local residents and businesses. The frontages demonstrate a number of specialist retail uses along with food, drink and entertainment uses predominantly located in Pied Bull Yard.

There are in any event no suitable units available in the designated frontage. There is only one unit that is currently vacant (the property at no. 64 Great Russell Street), however this unit is not of sufficient size to accommodate the proposed use and is protected from a change of use away from Class A1 use in accordance with Camden's policy position in this location (CPG 5 Town Centres, Retail and Employment (2013)).

The intention of the proposal is to provide a local service for tourists, businesses and residents in the area. In particular, it is appropriate for the

proposed unit to be located within the hotel building and continue to provide a food offering for guests, albeit as a separate unit. The area of search is therefore restricted to where this function can be met.

5.4 OTHER CONSIDERATIONS

- **OPENING HOURS**

The café currently operates from 11:00am-11:00pm (Monday – Saturday) and 12:00pm – 10:30pm (Sunday). The proposed opening hours of the independent unit are 08:00am – 11:00pm (Monday – Sunday).

- **SERVICING**

The unit is currently serviced as part of the wider hotel. The independent unit will be serviced through the front entrance.

- **WASTE MANAGEMENT**

Refuse/ recycling from the unit will be stored in the designated store; this is detailed on the proposed floor plan. Refuse/ recycling will then be collected from the pick-up/ drop off area in front of the hotel.

- **PLANT**

The existing air conditioning units will be retained with no additions. The existing extraction system will be retained.

- **FIRE ESCAPE**

The unit currently demonstrates no fire exits in addition to the front entrance. The front entrance will be retained.

6 SUMMARY AND CONCLUSIONS

This Statement is submitted in support of an application for Full Planning Permission, made by Colliers International on behalf of Walduck Properties Limited, with regard to the property at 83-95 Southampton Row (Bedford Hotel).

The proposed development is described as:

“Change of use from ancillary hotel café/ restaurant (Class C1) to independent Class A1 (Shops) or Class A3 (Restaurants and Cafes) unit”

The proposed unit is currently operational as a café/ restaurant as part of the Bedford Hotel’s catering offer. The unit serves both hotel guests and visiting members of the public. The creation of an independent unit will serve to provide a higher quality offering and is in-keeping with the mix of ground floor uses along Southampton Row.

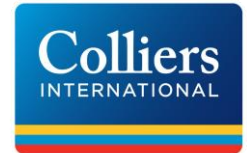
The creation of a unit separate to the hotel will enable a specialist operator to locate in the area. The proposed use is appropriate in this location and will continue to serve a local catchment in addition to guests of the hotel. In this respect, whilst a new independent unit will be created, the function will not change significantly.

In conclusion, the proposals are compliant with national and local policy and will make a positive contribution to the character and appearance of the conservation area.

APPENDIX 1 – PLANNING HISTORY

Application Reference	Date of Application	Description of Development	Date of Decision	Decision
2010/1144/P	09/09/10	Retention of fire escape doors to front elevation of existing hotel (Class C1).	07/10/10	Planning Permission Granted
PSX0105113	18/09/01	The erection of a single storey glazed extension to the front elevation to form a new glazed lobby entrance, together with planting to the front area and new paving and the installation of ramps and removable bollards (Retrospective). Proposed new vehicular access doors to delivery bay fronting Southampton Row, as shown on drawing numbers 1686/01,/07C and /10.	13/12/01	Refusal and enforcement action
PSX0104638	11/06/01	The erection of a single storey hotel entrance, internal alterations, and alterations to the ground floor front elevation and alterations to the vehicle access including new paved and planting areas. As shown on drawing numbers 1686/01, 2D, 3B.	24/07/01	Refusal
PS9805219	14/12/98	The erection of a 'porte-cochere' on the front elevation enclosing the vehicle pull off, as shown on drawing numbers 982/1 and /2.	06/07/99	Planning Permission Granted
8580268	12/11/85	The installation of four neon signs to be located within the glazed ground floor frontage. ^As shown on one unnumbered drawing. ^Period of consent is from 1st January 1986 to 31st December 1990	04/12/85	Grant Approval for Advertisement
8501878	12/11/85	Modernisation of ground floor coffee shop restaurant and hotel reception comprising alteration to elevation. ^As	04/12/85	Planning Permission Granted

		shown on drawing nos.2/665 010 & 012.		
CA.1933	07/04/64	to the display of a projecting box sign, with internal static illumination fixed at ground floor level upon an intermediate pilaster within the frontage of the Bedford Hotel Southampton Row, W.C.1.	17/04/64	Planning Permission Granted
TP11016/5741	07/06/62	The erection of a hotel building on the site of the former Bedford Hotel, 83-95 Southampton Row, Holborn, comprising basement car park, ground and seven storeys ever.	28/09/62	Planning Permission Granted



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