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## Introduction

Planning, Design and Access Statement

1.1 This Planning, Design and Access statement accompanies a planning application for extensions and alterations to the Mercure London Bloomsbury Hotel. These extensions would provide the Hotel with additional accommodation, and enable it to capitalise on business which it is currently having to turn away. The proposed extensions would add 15 new bedrooms to the Hotel, increasing its capacity from 114 to 129 rooms. It would also allow for the enlargement of 17 existing rooms, to provide a better standard of accommodation.

**1.2** The Hotel is regularly fully booked, particularly during the week (Monday-Thursday) and on Saturday nights. There is a pressing need for additional accommodation, which will allow it to respond to the very high level of demand it has been experiencing since a full refurbishment in 2010. The Hotel is also particularly in demand because of its excellent location, which is ideal for both tourists and business travellers.

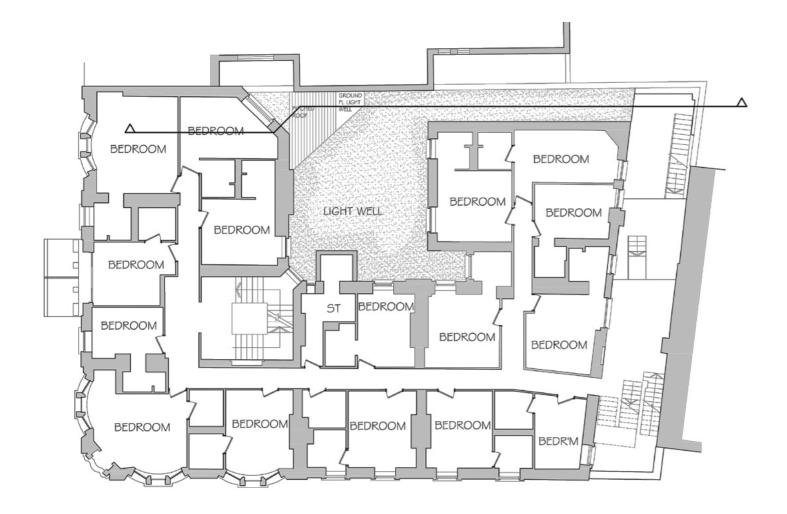
**1.3** The provision of additional hotel accommodation brings many benefits, including through the generation of new employment for local people, and broader associated economic benefits for London through support of the tourist industry and business. It is therefore supported in principle by local and regional planning policies, which recognise these benefits.

**1.4** The proposed extensions have been carefully designed, to ensure that the hotel's appearance would not be significantly altered, and that no harm would be caused to the character and appearance of the Bloomsbury conservation area. They have been influenced by pre-application advice from Council Officers, specialist heritage advice from Heritage Collective, and consideration of other similar extensions in the local area. A large proportion of the extensions proposed by this application have also previously been granted planning permission, which has demonstrated that they are acceptable in principle.

**1.5** We believe that the proposed development complies with the relevant planning policies, and that this application therefore benefits from the presumption in favour of sustainable development. As such, we believe that the proposals are entirely acceptable in planning terms.



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Existing floor plan for the second to third floors.



Proposed floor plan for the second to third floors.

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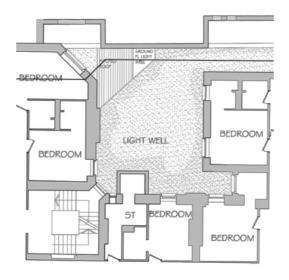
# The Proposed Development

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2.1 This application proposes extensions to the existing hotel, which would provide new accommodation in subtle ways, by making an efficient use of the least visually prominent parts of the building. This would provide 15 new bedrooms, increasing the Hotel's accommodation from 114 to 129 bedrooms. It would also provide substantial improvements to 17 existing bedrooms, with the addition of further living accommodation.

#### **Light Well**

2.2 The building has a light well at its core, into which extensions are proposed. This element of the proposed development has previously been granted planning permission (application 2014/4209/P), which remains extant. The same proposals have been incorporated in to this application, in order to allow a comprehensive view of the proposed changes to the building, and to simplify the process of building the proposed extensions and alterations together.





The existing bedrooms facing the light well (top) and the enhanced bedrooms proposed (bottom).

**2.3** The extensions within the light well would provide enhanced accommodation in three rooms per floor, from the 1st to 5th floors, and one room in each of the 6th and 7th floors, making 17 enhanced rooms in all.

2.4 The application also proposes to relocate 60 air conditioning units, from their current position within the light well, to a new position behind a screen intended to hide them and attenuate the noise they make. It is anticipated that details of their new location and screen can be provided in connection with a planning condition.



Air conditioning units in the light well.

#### The Proposed Development

Planning, Design and Access Statement

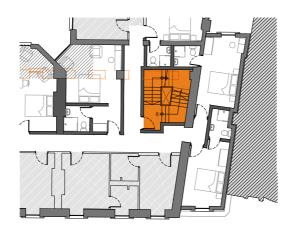
#### **Rear Extension**

2.5 An extension would be added to the building's rear elevation, in place of an existing metal staircase. This is currently used as an emergency exit route, but it is not ideal for this purpose given that it is exposed to the elements; it currently presents a potential safety risk, for instance if someone should slip on a wet surface. The proposed development would incorporate this staircase within the building, in place of one of the existing bedrooms. The loss of this bedroom would be compensated for with the addition of two new bedrooms on the back of the building, in place of the old staircase.

#### **Roof Accommodation**

**2.6** The application also proposes enhanced accommodation within the building's roof space. This involves the creation of a new 8th floor, which would accommodate 6 new bedrooms. This has been carefully designed, with the intention that it would not increase the building's height, or significantly alter its appearance when viewed from the street.





The route of the existing (top) and proposed (bottom) emergency staircases.

**2.7** The roof extension would add a further row of dormer windows above the existing windows. These would utilise materials which would match the existing windows, and due to the oblique angle at which they would be viewed from the street, they would not be clearly visible. As such, they would result in very little change to the building's appearance, when viewed from either Southampton Row or Cosmo Place.

2.8 The effect of these minor alterations to the building's appearance on the character and appearance of the Conservation Area are considered in the Heritage Statement by Heritage Collective, which accompanies this application. We believe that these extensions have been designed in a manner which would be suitable, and in keeping with the building's character, and this matter is discussed further in Section 6.



From close guarters, the roof extension would not be visible, as is already the case for the 7th floor.

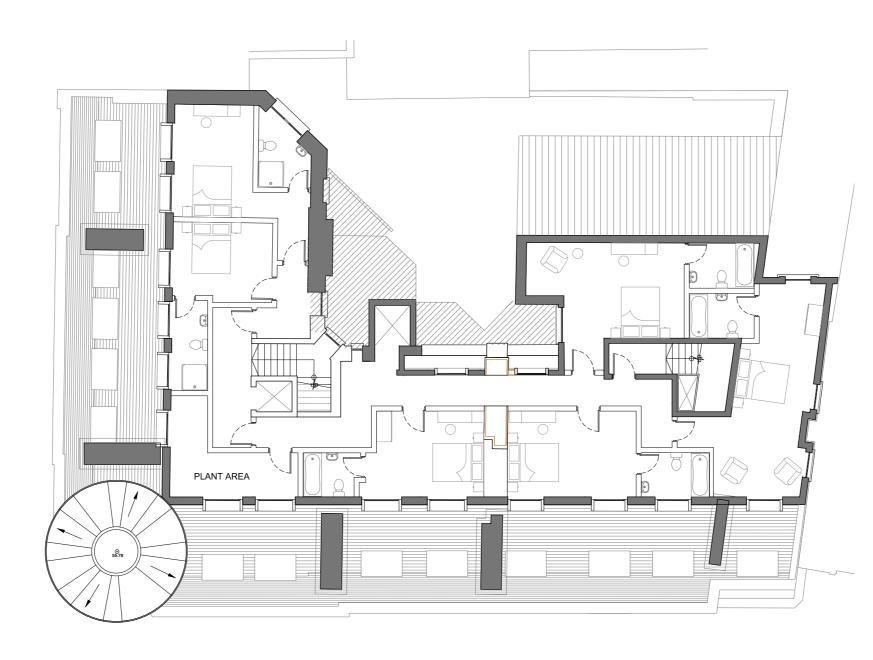


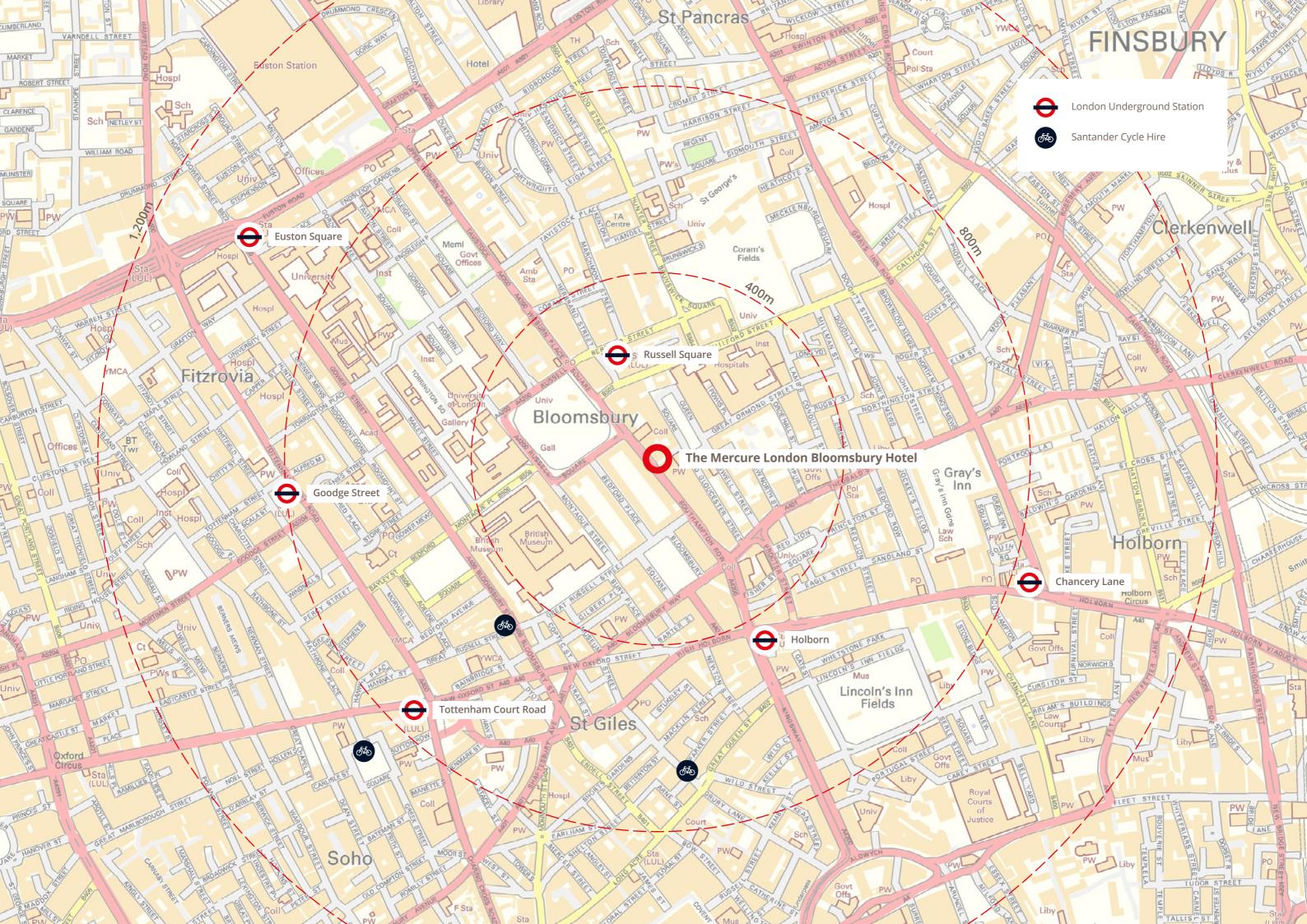
The Hotel, viewed from across the street, where the roof accommodation will be visible, between the existing chimneys.

#### The Proposed Development

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The proposed 8th floor accommodation, which would be set well back from the building's street frontage.





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#### Accessibility

**3.1** The Hotel is in one of the best connected areas of London, with a Public Transport Accessibility Level (PTAL) of 6b, which is the highest level, and described by Transport for London (TfL) as '**excellent**'. It is also in an area which is described by the Camden Core Strategy as '**Highly Accessible**'.

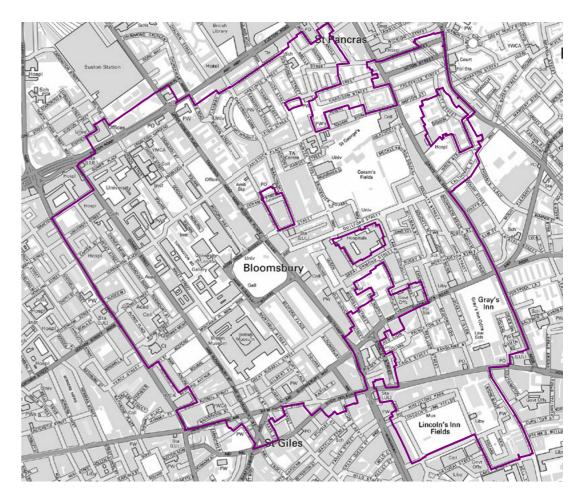
**3.2** This location has excellent public transport links. There is a bus stop almost immediately outside the Hotel, on Southampton Row, which connects with a number of bus services, which run regularly and provide services spanning London, and particularly running north-south. The site is less than 400m walk from Russell Square underground station (Piccadilly Line), and a little over 400m walk from Holborn Station (Piccadilly and Central Lines). In addition, there are 5 Santander Bike points within a short walk of the application site.

#### **The Surrounding Area**

**3.3** The application site is the Mercure London Bloomsbury Hotel, a 7 storey end of terrace building, located at 130– 134 Southampton Road. The site is a short walk from Russell Square, and it is located on the edge of the Bloomsbury conservation area.

**3.4** Bloomsbury is an attractive part of London, and the quality of its environment and central location attracts tourists from around the world. The London Plan designates this area as part of the Central Activity Zone (CAZ), which it describes as the 'Globally iconic core of one of the world's most attractive and competitive business locations'.

**3.5** The area surrounding the application site is of mixed use, primarily commercial in nature, with offices, hotels and other businesses, whilst there is also some residential accommodation to the rear of the site.



Extract from Camden Council's Bloomsbury Conservation Area map.

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**3.6** Southampton Row is a major thoroughfare extending south to the junction of High Holborn and Kingsway, and north to Russell Square. It is a broad street, which routinely accommodates a very high volume of pedestrian, cycle and car traffic.

**3.7** The buildings on Southampton Row are typically tall, of a similar height, and some are of a greater height than the 7 storey Hotel. The buildings immediately to the north and south of the Hotel have attractive Victorian frontages, whilst other buildings on the street are of a more modern, and less attractive appearance. Many of these buildings have Mansard roofs, like the Hotel, which are set back from the main frontage.

**3.8** To the south of the site is Cosmo Place, a pedestrian thoroughfare, linking Southampton Row to Queen Square. As it passes the site, Cosmo Place has a relatively passive frontage, and it becomes more active to the east, with two pubs and a restaurant facing the street on its northern side.



Cosmo Place, seen from Queen Square, with the Hotel in the background.

**3.9** The buildings to the rear of the Hotel, on Cosmo Place, are substantially smaller, at 4 storeys in height. The Hotel is close to, but does not immediately adjoin the next-door building, which is in use as the Swan pub, with residential accommodation above.

**3.10** Facing the Hotel across Southampton Row is the Bedford Hotel, and a mid-century residential development, with commercial premises on the ground floor, access to a carpark and views through into a courtyard serving the residences. This is a building with a functional appearance, which does little to contribute to the character of the conservation area.

**3.11** To the rear of the Hotel are buildings which generally contain apartments and offices, which largely fill their plots, consistent with the general grain of development in the local area.



The view from the fire escape staircase on the back of the Hotel, looking north.

Extensions and alterations to the Mercure London Bloomsbury Hotel





The view from the rear staircase, looking south.

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#### **The Hotel**

**3.12** The Mercure London Bloomsbury Hotel (referred to throughout this statement as 'The Hotel'), was known until 2008 as the Waverley Hotel. Despite the change in name, it has been owned by the Applicant, Fairview Hotels and Health Care Ltd, since 1983. In 2010 it was subject to a £6.5 million, full refurbishment programme, which has significantly improved the quality of the facilities on offer.

**3.13** Following its refurbishment, the Hotel has been in consistently strong demand. It is now typically fully occupied during the week (Monday-Thursday) and on Saturdays, whilst Fridays and Sundays can also achieve high occupancy during peak periods. Weekend sales are restricted in particular due to a lack of single rooms, but there is also substantial demand for double and twin rooms, particularly around weekends. **3.14** The Hotel has seen year-on-year growth in demand and revenue since 2008 and that trend is projected to continue. However, it is being frustrated by the need for new accommodation, as a large amount of business is being turned away. This application therefore represents not only an important step for the Hotel as a business, but also an opportunity to generate further local employment, and bring business and tourist income to the area.

#### The Application Site

**3.15** The Hotel's principal frontage is to Southampton Row, where the building has an attractive and ornate elevation. This is of red brick, with white Portland stone surrounds and mullions for its many windows. It is generally symmetrical in appearance, other than a distinctive round 3 storey turret, with a curved lead covered cupola, located at the corner of Southampton Row and Cosmo Place. This feature is reasonably prominent in views along Southampton Row, and it makes a positive contribution to the street's character. Next to the turret, and less prominent, are large rectangular chimney stacks, whilst a mansard roof sits above and slightly set back from the main elevation.



The Hotel, seen from Southampton Row.

Extensions and alterations to the Mercure London Bloomsbury Hotel

**3.16** At ground floor level, the Hotel contains commercial premises, with a sandwich shop and brasserie. At the centre of its Southampton Row frontage is the entrance to the Hotel, marked by a formal white-painted surround and portico. In contrast, the commercial units have plate glass windows with aluminium frames.

**3.17** The Hotel is not a listed building, but it is identified in the Council's Bloomsbury Conservation Area Appraisal (CAA) as being a '**positive building**'. Whilst this is not defined in the CAA, we assume that it means the building makes a positive contribution to the character and appearance of the conservation area, a view with which we agree.

**3.18** The Hotel also faces Cosmo Place to the south, a pedestrian thoroughfare connecting Southampton Row to Queen Square. The building's character on this elevation is far more low-key, with a cream brick rather than red, and far fewer windows. At ground floor level it contains plant and a blank frontage, whilst there is a service entrance and emergency exit to the rear.

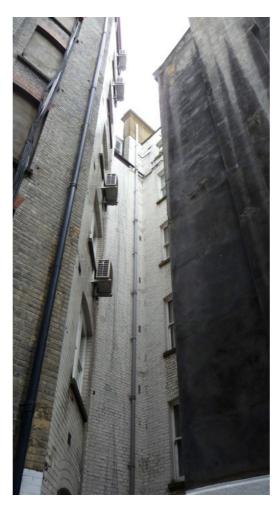
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The back of the Hotel, and The Swan pub.



The fire escape staircase on the building's rear elevation.



he light well at the building's centre.

3.19 The part of the Hotel's rear elevation close to Cosmo Place is marred by an unattractive metal fire escape staircase, attached to a chimney breast which runs the full length of the rear elevation. Away from Cosmo Place, the building's appearance becomes less formal still, clad in a stock London brick.

**3.20** Whilst the building fills the application site at ground floor level, from first floor level upwards it contains a light well. This is a largely hidden space, clad in stock bricks, and also currently accommodating a large number of air conditioning units and the metal-clad shaft of the service lift. It contains many bedroom windows with obscured glass.

Extensions and alterations to the Mercure London Bloomsbury Hotel

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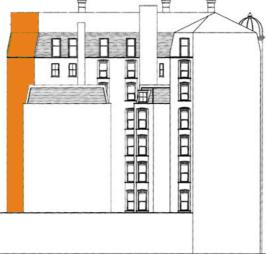
#### **Relevant Planning History**

**3.21** Planning permission was granted in 2011 (2011/4011/P) for extensions to the hotel which would have provided additional accommodation within the light well, and also with an extension on the rear of the building, in place of the current metal staircase. These proposals were similar to those now put forward by the current application, and they demonstrate that this type of extension is acceptable in principle.

**3.22** Following this, planning permission was granted once more in 2014 (2014/4209/P) for an extension within the light well. This extension was a little different to that permitted in 2011. The 2014 permission has not yet expired, and it could still be implemented. As noted in Section 2, this relates to the construction of a 5 storey rear extension within the light well, and the movement of 46 existing air conditioning units to the rear elevation of the proposed extension to the hotel. It demonstrates that the proposed extension within the light well has already been judged to be acceptable in principle.

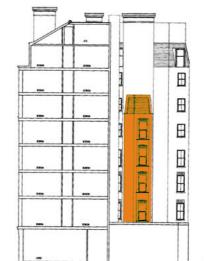
**3.23** We also note that planning permission was granted for an eighth floor extension on 150 Southampton Row (2013/5917/P), 20m to the north of the application site. This allowed for the addition of an 8th floor (9th storey), to be set back from the street frontage. This extension is comparable to that proposed by this application, and it was highlighted to the Applicant by Council Officers, in their pre-application advice in relation to this application (see Section 6). This planning permission demonstrates that a roof extension similar to that proposed by this application is acceptable in a very similar context.



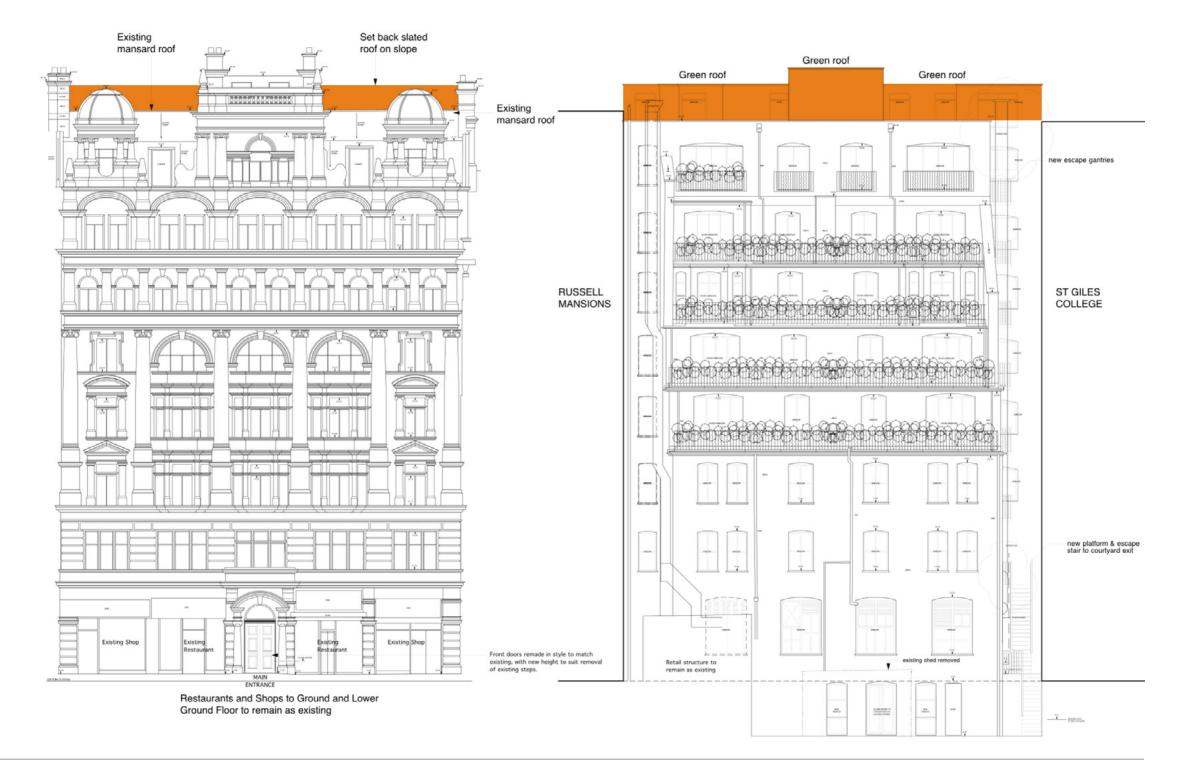


The 2011 planning application drawings, with the approved extensions highlighted (Drawing by Leach Rhodes Walker Architects).





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The roof extension to 150 Southampton Row, with the new accommodation highlighted (Drawing by Casson Conder Partnership Architects).

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**4.1** Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise<sup>1</sup>. The Camden Local Development Framework comprises the Camden Core Strategy (2010), the Camden Development Policies (2010) and the London Plan consolidated with alterations since 2011 (2015), which is also known as the Further Alterations to the London Plan, or FALP. The Council has also produced a number of Supplementary Planning Documents. In addition, the policies of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) constitute important material considerations. The policies highlighted below are elements of this broad body of planning policies and guidance which we consider to be of particular relevance to the application proposals.

#### National Planning Policy Framework (March 2012)

**4.2** The National Planning Policy Framework (NPPF) sets out the Government's policy with regard to planning, and it is the basis for all planning decisions today.

4.3 Paragraph 6 of the NPPF states that The purpose of the planning system is to contribute to the achievement of sustainable development'. This emphasis on the need for sustainable development is echoed throughout the NPPF. Paragraph 7 summarises the three dimensions of sustainable development as follows:

 'an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

**4.4** The fundamental precept of the NPPF is a presumption in favour of sustainable development. Paragraph 14 states 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.

<sup>1.</sup> See Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

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**4.5** Footnote 9 then clarifies that the policies in the NPPF which may indicate that developments should be restricted may relate to a number of issues, such as the protection of designated wildlife sites, landscapes, Green Belt or designated heritage assets, none of which relate to this application. We do not believe that any of the policies in the NPPF indicate that development should be restricted on the application site, and we certainly do not believe that there would be any adverse impacts which would meet the high test of 'significantly and demonstrably outweighing the benefits' that the application would bring. As such, we believe that this application benefits from the presumption in favour of sustainable development.

**4.6** Paragraph 19 states that planning 'should operate to encourage and not act as an impediment to sustainable growth'.

#### Camden Core Strategy (2010)

**4.7** Policy CS3 seeks to promote new development in the highly accessible areas of the Borough. As we have noted in Section 3, this includes the application site.

**4.8** Policy CS5 encourages the provision of development which will provide '**the infrastructure** and facilities needed to support Camden's population and those who work in and visit the borough'. We believe that the provision of hotel accommodation helps to meet this need. The policy also seeks to protect the amenity of residents and where necessary it allows for the needs of planning to be accommodated to the needs of local communities via mitigation measures.

**4.9** Policy CS8 seeks to promote new employment. Whilst much of the Policy relates to traditional B-class employment uses, it also recognises the contribution which other sources of employment can provide, including the tourism industry, and it specifically supports 'the development of Camden's tourism sector'. The proposed development would both contribute to the Borough's ability to attract tourists, and provide jobs for local people. These benefits are considered further in Section 5.

**4.10** Policy CS9 encourages further development of Camden's role in Central London, including providing a focus for various uses which are important to this area, including hotels.

**4.11** Policy CS13 seeks to improve environmental standards in new development. This includes support for the efficient use of land and buildings, and low energy and water use in new buildings. The Policy's aim is to reduce carbon emissions, and this matter is considered further in Section 5.

**4.12** Policy CS14 seeks to promote high quality development and preserve and enhance heritage assets. New development is required to be of a high quality design, reflective of the local area, and in particular preserving the character of conservation areas. The application site sits within the Bloomsbury conservation area. This has been an important consideration in designing the proposed improvements to the hotel, and it is discussed in Section 6, and in the Heritage Statement which accompanies this application.

Extensions and alterations to the Mercure London Bloomsbury Hotel

#### **Camden Development** Policies (2010)

**4.13** Policy DP1 requires the provision of mixed use development, where appropriate, in developments which would provide more than 200 sq m gross additional floor space. It seeks the inclusion housing in those developments. This would however clearly not be practical or reasonable with regard to the extension of the Hotel, as an existing business, and the Policy recognises that a building's existing use and other planning objectives may dictate that this Policy's aims cannot be met. This matter has not previously been raised by the Council in relation to previous applications or pre-application discussions, and so we do not consider this Policy further.

**4.14** Policy DP14 states that the council will encourage tourist development including tourist accommodation in the Central London Area, where the application site is located. The site benefits from the protection afforded by this policy for existing visitor accommodation in an appropriate location, and we believe that the proposals are otherwise entirely compliant with this Policy.

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**4.15** Policy DP18 requires development within the Central London Area to be car free.

**4.16** Policy DP24 seeks to secure high quality design. The following requirements are considered particularly relevant, and these matters are considered further in Section 6:

a) 'character, setting, context and the form and scale of neighbouring buildings;

b) the character and proportions of the existing building, where alterations and extensions are proposed;

c) the quality of materials to be used;

e) the appropriate location for building services equipment;

i) accessibility.'

**4.17** Policy DP25 seeks to protect the character of Camden's conservation areas. Specifically, it requires new development proposals to be designed with regard to conservation area statements, appraisals and management plans. It also states that development will only be permitted within conservation areas, where this preserves and enhances the character and appearance of the area. These matters are considered in the Heritage Statement which accompanies this application, and also within Section 6 below.

**4.18** Policy DP26 seeks to restrict development which would harm the quality of life of occupiers and neighbours. It concerns matters including privacy, outlook, sunlight and daylight, noise, odour and microclimate, as well as the inclusion of appropriate attenuation measures. These matters are considered further in Section 6.

#### Supplementary Planning Guidance

**4.19** Camden Borough Council has issued supplementary planning guidance concerning the application of policies in the Local Development Plan. Of these, CPG 1 (Design) and CPG 6 (Amenity) are particularly relevant to this application.

**4.20** CPG1 offers detailed guidance on rear extensions to existing buildings, and on roof extensions, as follows:

### 'Rear extensions should be designed to:

- be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;
- respect and preserve the original design and proportions of the building, including its architectural period and style
- respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;

- respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space;
- not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/ spillage, privacy/overlooking, and sense of enclosure.'

**4.21** With regard to roof alterations and extensions, CPG1 includes the following guidance:

'Additional storeys and roof alterations are likely to be acceptable where:

- There is an established form of roof addition or alteration to a terrace or group of similar buildings and where continuing the pattern of development would help to re-unite a group of buildings and townscape;
- Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form;

Extensions and alterations to the Mercure London Bloomsbury Hotel

 There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm.'

**4.22** CPG6 offers guidance on preserving and enhancing amenity. Particularly relevant are the guidelines on overlooking, privacy and outlook, and the accessibility of buildings. These matters are considered further in Section 6.

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#### The Emerging Camden Local Plan

4.23 The Camden Local Plan is currently awaiting Public Examination. When finalised, the Plan will replace the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the Borough. The document has not yet been approved and so cannot currently be given substantial weight in planning decisions. However, we welcome Policy G1's focus on making most efficient use of existing land within the borough, in particular through '**supporting** development that makes best **use of its site**'. We believe that the application proposals offer just such a development. By making more efficient use of spaces on the site, we can contribute to the London economy and the capital's target for new hotel rooms through developing space that can have no other productive or amenity value.

#### The London Plan (Consolidated with Alterations) (2015)

4.24 The London Plan was published in 2011, and an updated version with alterations since then was published in 2015. The latest version is referred to here as the Further Alterations to the London Plan (FALP), and this plans for the period up to 2036.

**4.25** Policy 4.5 seeks to support the development of London's tourist infrastructure and visitor accommodation. In particular, it sets a target of 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. The proposed development would make a useful contribution towards this requirement, within the constraints of an existing Victorian building. The policy also seeks to allocate hotel development within the Central Activity Zone, which is where the application site is located.

4.26 Policy 5.2 seeks to minimise carbon dioxide emissions, and it requires a reduction in carbon emissions in new buildings. The proposed extensions would help this existing building to perform more efficiently, and lead to a proportionate reduction in energy use, and so also carbon dioxide emissions, through improved thermal performance. This is considered further in Section 5.

**4.27** Policy 7.2 requires new developments to address inclusivity and access This matter is discussed in Section 7.

4.28 Policy 7.6 concerns the architecture of new development. It contains a number of requirements, which are considered throughout Section 6.

**4.29** Policy 7.15 concerns the management of noise. This is of relevance to this application in relation to the proposed relocation of the existing air conditioning units within the light well. This is considered further in Section 5.

5

# Material Planning Considerations

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#### **Principle of Development**

5.1 We have explained in Section 3 that extensions to the Hotel have previously been permitted in the light well, and on the rear elevation, which are similar to the current proposals. We have also highlighted in Section 4 that local and regional planning policies support the provision of tourist accommodation in Central London, where it is very accessible by public transport, and well placed to offer easy access to London's many tourist attractions. The proposed development represents an efficient and valuable use of otherwise useless space, within the footprint of an existing building. It is an inherently sustainable form of development, which complies with policy. As such, we believe it is clear that the principle of extending the Hotel is acceptable.

#### **Economic Sustainability**

#### Supporting London's Tourist Economy

**5.2** The London Plan highlights the importance of tourism to London's economy, and by extension the provision of visitor accommodation, stating the following:

The visitor economy is important to London as a whole, and there will be a need to ensure that the CAZ [Central Activity Zone] retains its status as a worldclass visitor destination, while also meeting the needs of those who live and work there.'<sup>1</sup>

**5.3** Tourism generates employment, both directly, in hotels and visitor attractions, but also with secondary effects. This includes additional trade for those who provide support to the tourist service industry, such as those in catering, or the production of goods purchased and consumed by tourists. The effect of tourism on the economy of London and the rest of the country is therefore substantial. **5.4** In recognition of the value and potential for growth of the visitor economy, the London Plan sets a target of 40,000 net additional hotel rooms by 2036 across London. The accompanying Working Paper requires 37% of the expected increase in the number of rooms will be met in Westminster, City of London and Camden. This reflects the need for visitor accommodation which the Hotel is already experiencing.

**5.5** The Hotel is located within the CAZ, and is close to a number of major tourist attractions, notably including The British Museum (a 5 minute' walk) and the theatre district (a 5 to 10 minute' walk). As a consequence of its desirable location and high standards, it is very successful, and frequently fully booked. This forces the Hotel to regularly turn business away, and there is a clear need for additional and enhanced accommodation to meet the demand the Hotel experiences on a daily basis.

Extensions and alterations to the Mercure London Bloomsbury Hotel

#### Supporting London's Business Economy

**5.6** Hotels such as this also play an important role in securing London's place at the centre of global business. It is essential that London continues to benefit from sufficient hotel accommodation, of a suitable standard, in order to allow it to continue to compete with other global cities.

**5.7** As we have noted in Section 3, the Hotel is typically fully booked during the week (Monday to Thursday nights), and there is a particularly strong demand for single bedrooms, which typically comes from business customers. Providing additional accommodation will therefore allow the Hotel to make a greater contribution to supporting business in London.

<sup>1.</sup> Further Alterations to the London Plan (2015), paragraph 2.49.

#### **Material Planning Considerations**

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#### Job Creation

**5.8** The Camden LDP notes that 80% of the jobs in Camden are taken by non-residents, because local residents lack the skills set to participate in the 'knowledge-based' businesses which predominate in this area. The Hotel provides service industry jobs, which offer an alternative to these businesses. These jobs are also typically taken by people living within easy access to the site, and so they would be highly suitable for local people.

**5.9** The Hotel currently employs 60 staff, to serve its existing 114 bedrooms. The Applicants anticipate that the proposed extensions, which would provide 15 new bedrooms, and enhance the quality of a further 17 existing rooms, would generate the demand for a minimum of a further 5 full-time equivalent jobs.

**5.10** The construction period for the proposed development would also create employment, with the potential to benefit those particularly in need, such as the unemployed and young people. It is also likely to generate jobs for local people.

**5.11** The expansion of the Hotel will therefore make a useful and positive contribution to Camden's visitor economy, help to meet the Mayor of London's target for growth in hotel beds, and provide much needed jobs in the local area.

#### Social Sustainability

#### **Employment and Diversity**

**5.12** The provision of additional jobs, outlined above, would be of great benefit to the local people employed. The Hotel provides a range of jobs, including cleaners, cooking and waiting staff, receptionists and management. As such, its extension has the potential to benefit a range of people. This in turn can contribute towards the maintenance of a vibrant and diverse community in the local area.

#### Design

**5.13** The proposed development has been designed to a high standard, so as to preserve the character and appearance of the Bloomsbury conservation area, and also respect the amenity of neighbouring residents. Well designed and attractive buildings are essential aspects of sustainable development, and attractive and functional places make a valuable contribution to the wellbeing of local people.

#### **Environmental Sustainability**

#### **Energy Efficiency**

**5.14** The proposed development would improve the energy efficiency of the existing building, by providing extensions which would comply with current building regulations. In particular, the replacement of the existing roof with a modern structure conforming to current standards for thermal efficiency, will substantially reduce the loss of heat. This will proportionately reduce the building's energy requirements, and so also the carbon dioxide emissions associated with its operation.

5.15 Further efficiencies could be created through the replacement of the existing air conditioning units, following the removal of the 60 existing units located within the light well. New units are expected to be more modern and energy efficient.

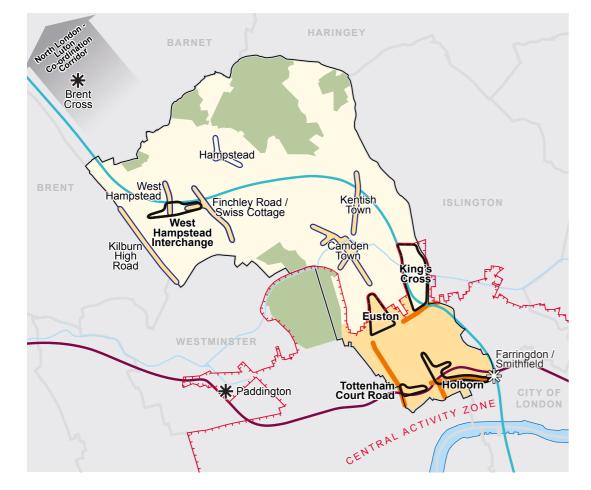
**5.16** By minimising energy demand, the proposals would lead to a more sustainable form of development, and would comply with local and regional policy requirements in this regard, as outlined in Section 4.

#### Sustainable Travel

**5.17** The application site is in an exceptionally sustainable location, with regard to accessibility by walking, cycling and public transport, and it provides good potential to prioritise non-car uses. It is within a PTAL 6b area, implying it is within one of the most accessible parts of London. The Council's Core Strategy also designates the area as 'Highly Accessible'. We have outlined the proximity of various sustainable transport options in Section 3.

#### **Material Planning Considerations**

Planning, Design and Access Statement



The Key Diagram from the Core Strategy, which identifies the Central Activity Zone (CAZ) and Highly Accessible Area, both of which the application site falls within.

#### Noise

**5.18** The proposed development would reduce the noise generated by the 60 air conditioning units which are currently located within the light well. At present, these units have the potential to cause a large amount of noise on hot days, when they could all be in use, whilst the occupants of nearby buildings have their windows open. The application would relocate these units behind a screen, which would be designed to attenuate the noise they generate. In moving them, it is also likely that the units will be replaced with newer and quieter models.

**5.19** This element of the proposals was seen as a benefit at the time that the previous similar applications (see Section 3) were determined. Officers commented as follows, with regard to the 2014 application:

The proposed relocation of the air con units would be behind an acoustic louvre, preventing noise and complying with the Council's noise standards. The proposed relocation with the acoustic louvre would therefore be an improvement to the existing position of the air con units by reason of noise and impact on conservation area.'

### The Presumption in Favour of Sustainable Development

**5.20** The presumption in favour of sustainable development applies to proposals for residential development, as directed by paragraph 49 of the NPPF. Paragraph 14 states that where local policies are out of date, planning permission should be granted 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.'

5.21 There are no such policies which indicate that this development should be restricted. As such, development should be permitted unless there are adverse impacts of such severity that they 'significantly and demonstrably outweigh the benefits'. We do not believe that there are any such adverse impacts and we believe that planning permission should therefore be granted without delay.

Planning, Design and Access Statement

Drawings of the proposals presented to the Council at the pre-application stage.

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## Design

Planning, Design and Access Statement

#### **Pre-Application Discussions**

6.1 Council Officers provided preapplication advice regarding initial proposals for the extension of the building. This written advice from Officers did not raise any in-principle objection to the proposed extensions. However, the proposed form of the roof was considered to be too dominant. Officers suggested that the extension to the roof should sit below the level of the turret on the corner of the building, so as to ensure it retained its current prominence in views of the building from Southampton Row. They also suggested that the addition of a Mansard roof on the rear elevation, which was to stretch in one curved line from the 5th to the 8th floor, would create a feature which would be too visually dominant.

**6.2** The application proposals have been revised in response to this advice. The height of the roof has been reduced, and it would now be the same as that of the existing building, so as to ensure that the turret retains the same prominence it currently has. On the rear elevation, the extension has been provided in a series of stepped extensions, thus breaking up its mass and creating a less 'dominant' architectural form, as requested.

**6.3** Officers highlighted the approved roof extension to 150 Southampton Row (see Section 3), which was set back from the parapet wall on the building's frontage, and suggested that a similar set-back would be necessary for a roof extension on the Hotel.

**6.4** With regard to the effect of the extensions on the amenity of neighbours, Officers concluded that:

'It is not considered that the erection of an additional storey at the application site would cause an unacceptable impact on the levels of amenity of neighbouring occupiers. As such, it is considered that the proposal is acceptable in amenity terms.'

#### Use

**6.5** The proposed development would not change the use of the building, which would remain as a hotel, in the C1 use class.

#### Amount

**6.6** The proposals would increase the number of rooms within the hotel from 114 to 129. They would also provide extensions to enhance 17 of these rooms. The total floor area of the building would increase from 3,830 sq m to 4,496 sq m. Extensions and alterations to the Mercure London Bloomsbury Hotel

#### Scale

**6.7** The proposed development has been designed so as to be of a suitable scale with regard to its effect on the appearance of the building, and the character of the wider area. The Council's comments at the preapplication stage (see above) have strongly influenced the proposed design, for instance through the reduction in the height of the top floor, so as to reduce the building's apparent scale, particularly when viewed from Southampton Row. The proposals would not increase the building's height or notably increase its scale from this principal elevation, whilst the other extensions would be in discreet locations, where any increase in scale would be far less noticeable.

Planning, Design and Access Statement

#### **Appearance**

**6.8** The building's appearance would not change markedly from the front elevation on Southampton Row. The alterations to the building on this side are essentially limited to the addition of windows in the top floor, in place of a blank slate-covered Mansard wall. The existing materials would be replicated.

**6.9** On the side elevation, facing Cosmo Place, the building would be extended to the rear. This would be in matching brickwork, to ensure that the extension is not visually obtrusive. The extension would also be set in slightly from the flank elevation, ensuring that it would appear subservient to the original building, and also that it would not dominate the front elevation of the adjacent pub building.

**6.10** This extension would replace the existing metal staircase on the building's rear elevation, and move it inside. This staircase is an unattractive feature (see Section 3), which does nothing to enhance the building's appearance, and removing it would be of inherent benefit.





Southampton Row

Cosmo Place

**Existing elevations** 

Extensions and alterations to the Mercure London Bloomsbury Hotel

Side

Planning, Design and Access Statement



Southampton Row

Cosmo Place

**Proposed elevations** 

Extensions and alterations to the Mercure London Bloomsbury Hotel



Side

Planning, Design and Access Statement

6.11 The extensions to the rear of the building and the light well would be largely hidden from view within publicly accessible areas. Nevertheless, as we note above, they have been revised from the initial pre-application proposals, following Officers' comments, to step the roof up in stages, rather than in a single sweeping curve, which Officers felt would be an excessively dominant feature. We believe that the application proposals are entirely in keeping with the appearance of the building, and that they would form a visually appropriate extension.

#### Materials

6.12 The building is constructed of a fine red brick and Portland stone on its front elevation, and the elevations become less formal as they become less public. The Cosmo Place frontage is constructed primarily of a cream brick, whilst the rear and light well walls are constructed of a cheaper London stock brick. The walls of the proposed extensions would use similar bricks, which would be chosen to achieve the closest possible match with the existing building.







Extensions and alterations to the Mercure London Bloomsbury Hotel



Waller Planning

Planning, Design and Access Statement

**6.13** The roof would be clad in slate tiles at the front, to match the existing Mansard roof. At the rear, it would be clad in zinc, which is intended to add visual interest to what is currently a fairly utilitarian elevation.

#### Layout

6.14 The proposals would not significantly alter the layout of the site, as they would be extensions to a building which already fills its plot. The extensions would however allow for substantial improvements in the layout of accommodation within the building, including 17 enhanced rooms and the movement of the current external emergency exit staircase to a new location within the building. These amendments are all of great benefit to the Hotel's functionality.

#### Landscaping

**6.15** As the proposals relate to extensions to an existing Victorian building, above ground level, and within a conservation area, we do not believe that there is any realistic possibility of incorporating new landscaping into the proposed development.

#### **Residential Amenity**

**6.16** The proposed development has been carefully designed with the intention that it would not result in any unacceptable harm to the amenity of local residents, living in properties situated close to the site. As noted above, the Council's pre-application advice supports our view, that the proposed development would not result in any unacceptable impacts on the amenity of the occupants of neighbouring properties.

**6.17** The rear extension to the Hotel would not have any windows looking out towards the rear, and these would instead face Cosmo Place to the south, and obliquely across the back yard areas of adjacent properties to the north. These windows have been positioned so as to avoid looking out directly towards the properties to the rear of the site.

6.18 The other extensions would have windows facing the street frontage, or internally within the light well, and we do not believe that either would be likely to create any unacceptable loss of amenity for neighbouring residents.

#### **Built Heritage**

**6.19** The Heritage Statement which accompanies this application concludes that the proposed development would be entirely acceptable with regard to its effect on the character and appearance of the conservation area, and the setting of nearby listed buildings, which are minimal. It concludes that no harm will be caused to the significance of these heritage assets.

Extensions and alterations to the Mercure London Bloomsbury Hotel

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Planning, Design and Access Statement

### Access

#### **Sustainable Transport Options**

7.1 As we have highlighted in Section 3, the application site is well connected by public transport. It is within a PTAL 6b area, designating it one of the most accessible parts of London. The Council's Core Strategy designates the area as 'Highly Accessible'. There is a bus stop immediately outside the Hotel. It is 250m from Russell Square Tube and less than 500m from Holbourn tube. Mainline rail services at Farringdon and King's Cross St Pancras are both less than a mile away. There is a bus lane in front of the hotel, allowing for taxi pick up and set down. There are five Santander Cycle (Boris Bike) stations in the area of the Hotel, the nearest being less than 200m away.

**7.2** As a consequence of the site's highly accessible location, the Hotel is entirely suitable to remain car-free. This is consistent with Policy DP18, which requires development within the Central London Area (which includes this site) to be car free.

#### **Inclusive Access**

**7.3** The proposed development has been designed with careful regard to the needs of wheelchair users and the ambulant disabled. The Hotel currently has two separate lifts, one for guests and a service lift. The lift would be extended to run to the new 8th floor. This would ensure that all floors of the Hotel are accessible to everyone.

7.4 The building was not originally designed with disabled access in mind, and the Applicant has previously undertaken what alterations were possible, resulting in 2 rooms being fully wheelchair accessible, and suitable for use by disabled guests. The proposed development would create a further wheelchair accessible room. In addition, the amendments to the internal layout, with better proportioned rooms, may allow for some of the rooms to be more easily accessible by wheelchair and ambulant disabled guests.



### Conclusions

Planning, Design and Access Statement

**8.1** This application proposes extensions to the Mercure London Bloomsbury Hotel, to increase its guest accommodation from 114 bedrooms to 129, and also to increase the size and functionality of 17 existing rooms. In order to do this, three extensions would be added to the building.

**8.2** One part of the extension would be within the light well at the building's core, and this element of the proposals already has planning permission. These works would also involve the moving of 60 air conditioning units. This would provide an opportunity to replace these units with newer, quieter and more energy efficient models, and to place them behind a screen, which would reduce the apparent noise, as well as hiding them from view. This extension would allow for improved accommodation in existing rooms facing the light well.

**8.3** Another element of the proposed extensions would be attached to the rear of the building. This would replace an existing exterior metal staircase, which is a fire escape route, but which has the potential to be dangerous, for instance if it becomes slippery in the wet. This staircase would be replaced with a new stair within the building, in place of one existing room per floor. These rooms would be replaced with two new rooms per floor, on the building's rear elevation.

**8.4** The final element of the extension would be on the building's roof, as a replacement for the existing roof void. This would not increase the building's apparent scale when viewed from its principal elevation on Southampton Row, and it would simply appear as a new row of windows in the existing front wall of the Mansard roof. From the rear, the extension would appear larger, but it has been design with a stepped roof to break up its massing. The rear elevation is also far less visible from public areas.

**8.5** These proposals would have an entirely acceptable effect on the character and appearance of the Bloomsbury conservation area and the setting of nearby listed building. the accompanying Heritage Statement concludes that no harm would be caused to the significance of any of these heritage assets.

**8.6** The proposed development complies with the relevant planning policy requirements, and it therefore benefits from the presumption in favour of sustainable development. We therefore respectfully request that planning permission should be granted without delay, in accordance with national planning policy.



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