

TW/236

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Dear Robert,

**Mercure Bloomsbury Hotel, Revised Drawings (Application 2016/4188/P)**

Further to our meeting on 5<sup>th</sup> December, I have enclosed with this letter revised drawings for the proposed extensions to the Mercure Bloomsbury Hotel. My Client, Waverley House Hotel Ltd, wishes to submit these as formal alterations to the application proposals. The revised drawings have been prepared with the intention of responding to the comments made at our meeting and in separate e-mails, by yourself and the Council's Conservation Officer. They have been modelled in Revit, allowing for a 3D model of the proposals, which I believe presents the building and the proposed extensions in a way which makes them easier to understand, both in terms of the three-dimensional built form proposed, and its visibility from the surrounding area. The new drawings are listed below:

- 15026 (08) 30 Rev A - Proposed site plan
- 15026 (08) 31 Rev A - Ground floor plan
- 15026 (08) 32 Rev A - First floor plan
- 15026 (08) 33 Rev A - Second floor plan
- 15026 (08) 34 Rev A - Third floor plan
- 15026 (08) 35 Rev A - Fourth floor plan
- 15026 (08) 36 Rev A - Fifth floor plan
- 15026 (08) 37 Rev A - Sixth floor plan
- 15026 (08) 38 Rev A - Seventh floor plan
- 15026 (08) 39 Rev A - Eighth floor plan
- 15026 (08) 40 Rev A - Roof plan
- 15026 (08) 41 Rev A - South west elevation - Southampton Row
- 15026 (08) 42 Rev A - South east elevation - Cosmo Place
- 15026 (08) 43 Rev A - North east elevation - Facing Queen Square
- 15026 (08) 44 Rev A - North west elevation-Section
- 15026 (08) 45 Rev A - Section A-A
- 15026 (08) 46 Rev A - Section B-B
- 15026 (08) 48 Rev A - Massing view 01
- 15026 (08) 49 Rev A - Massing view 02
- 15026 (08) 50 Rev A - Massing view 03

For clarity, I can confirm that these drawings replace all previously submitted floor plan, elevation and section drawings of the proposed extensions, namely:

- 15026 (08) 11 Rev A – Proposed Side and Rear Elevations
- 15026 (08) 20 Rev A – Proposed First Floor Plan
- 15026 (08) 21 Rev A – Proposed Second Floor Plan
- 15026 (08) 22 Rev A – Proposed Sixth Floor Plan
- 15026 (08) 23 Rev A – Proposed Seventh Floor Plan
- 15026 (08) 24 Rev A – Proposed Eighth Floor Plan
- 15026 (08) 25 Rev A – Proposed Roof Plan
- 15026 (08) 28 Rev A – Sections 01 and 02 as Proposed

To summarise, the main changes to the proposed extensions to the hotel are as follows:

- The proposed number of additional bedrooms has been reduced from 15 to 13, and several of the rooms have been reduced in scale.
- The proposed extension to the roof to create a new eighth floor has been modified to incorporate a mansard roof on all sides, including within the internal courtyard elevations.
- The dormer windows which were previously proposed at the eighth floor level have been replaced by roof lights, as suggested by the Conservation Officer, whilst further roof lights are proposed on the flat roof itself, where they would not be visible.
- The side extension, which is the most easily visible part of the extension now has a roof form which has been designed to match that of the existing roof facing Cosmo Place, whilst the wall of this elevation has been given far more architectural detail, with new windows and decorative brickwork.
- The side extension has been narrowed, to match the width of the existing building at this point.
- The rear extension has been reduced in scale, as it is now both stepped in a little further from the side elevation, and the eighth floor accommodation has been omitted.

The extensions have been carefully designed both with regard to the comments made by yourself and your colleagues, but also with regard to the visibility of the extensions from public areas, which as I have noted above essentially amounts to Cosmo Place and Queen's Square. The effect of the extensions on these views is modelled on the proposed Massing View drawings (48, 49 and 50). These demonstrate that the main part of the extension which would be visible in these views would relate to the side extension. As we have discussed, a similar extension has previously been approved to this elevation, and the current application proposals must be considered in that context. The treatment of this elevation has been changed, and I believe that it would now be more attractive than the previously proposed extension, and more in keeping with the character of the building.

The rear extension would not be easily visible from public areas, and the Massing Views show that it would not be visible from Cosmo Place. A small amount of it would be visible, as an infilling of a small void seen between the buildings of Cosmo Place and the existing hotel, when viewed from Queen's Square. In this regard, I would remind you of the previous Inspector's report relating to an appeal considered in 1996, which is referred to in the Heritage Statement submitted to accompany this application. You may recall that I referred to this at our meeting, and showed you that it

related to the proposed addition of three storeys to the rear of the hotel, infilling the existing void and creating fifth, sixth and seventh floor accommodation; it was a larger extension than is proposed by this application. In that case, the Inspector concluded the following:

**‘On the first main issue I found that the site of the proposed roof extension was difficult to see from any public viewpoint in the Conservation Area, not just because trees in leaf in Queen Square intervened but also because the vertical and horizontal angles of view were mainly obscured by lower buildings. The rear views and the skylines of buildings facing Southampton Row were, I thought, somewhat of a confused jumble of heights and shapes seen from the Conservation Area. Insofar as the proposed extension would be seen, it would tend to lessen the jumble and the exposure of rather utilitarian structures common to the backs of most commercial buildings. I do not consider that the existing 6 storey structure plays any significant part in the transition from 8 storeys in Southampton Row to 4 storeys in Cosmo Place. I therefore conclude on the first main issue that the proposal would not be contrary to the development plan and would pay sufficient respect to the need to have special regard to the desirability of preserving the character and appearance of the Bloomsbury Conservation Area.’**

I believe this analysis, which was made in light of the same duties in the Listed Buildings and Conservation Areas Act 1990, remains relevant to the current application proposals. I also believe that the analysis by Heritage Collective, in their Heritage Statement, is also relevant, although I will not repeat their arguments here. I simply note that the revised proposals are reduced in scale and more sympathetic in design, and I believe that they are entirely appropriate in planning terms.

I note that you have agreed to extend the determination period for this application to 20<sup>th</sup> January, and I look forward to discussing the proposed design with you further in the new year.

**Policy DP1**

You have also asked for a formal response with regard to Policy DP1, which proposed mixed use development, where new build extensions are proposed of 200 sq m or more gross floorspace. I note that the policy makes this requirement only **‘where appropriate’**, and it contains various criteria with which to determine **‘whether a mix of uses should be sought’**. I have responded to these criteria below, in relation to the application proposals.

DP1 Criteria		Application Response
a	The character of the development, the site and the area.	The Hotel fills the application site, and can only be subject to limited extensions, due to its character and location within the Bloomsbury Conservation Area. Paragraph 1.19 of the supporting text to DP1 notes that existing developments and small sites may not have the potential to accommodate secondary uses, and also the limited scope to create new entrances in conservation areas.
B	Site size, the extent of the additional floor space, and	The potential to add floor space is strictly limited. It is also not practical to include a mix of uses, both because

	constraints on including a mix of uses.	of the impact on the Hotel's operations, the lack of space for segregation of those uses, and the lack of potential to provide separate access and egress routes.
C	The need for an active street frontage and natural surveillance.	This is of limited relevance with regard to the current application, as extensions would not significantly alter observation of the street, and would not affect active frontages.
d	The economics and financial viability of the development including any particular costs associated with it.	Insufficient additional floor space would render the extensions commercially unviable. The cost of building extensions to the Hotel will be substantial, due to the need to close the building for the duration of the works, and the difficulty of building the extensions due to the nature of the site. The extensions have been reduced in scale as noted above, but the Applicant believes that any further reduction would render them unviable. This is borne out by the failure to implement previous planning consents for extensions, as it was found that on balance they would not offer sufficient economic benefits to justify the expense and loss of revenue.
e	Whether the sole or primary use proposed is housing.	The sole use of the building is as a hotel.
f	Whether secondary uses would be incompatible with the character of the primary use.	Secondary uses would be incompatible with a hotel use for both operational and accessibility reasons. No separate entrance could be provided (paragraph 1.11 requires that housing should have a separate entrance at street level to non-residential uses, and this clearly could not be achieved in this instance). There would be a loss of security and privacy for guests. There is insufficient space for the building to be sub-divided to accommodate separate uses. There are myriad practical problems with additional uses on the upper floors of an existing hotel, which renders them unfeasible.
g	Whether an extension to the gross floor space is needed for an existing user.	The proposed extension is required to meet the current demand for accommodation, as noted in the Planning, Design and Access Statement. It is a planning policy priority to deliver new guest accommodation within highly accessible areas, to meet the growing demand from tourists and businesses.
h	Whether the development is publicly funded.	The development would not be publicly funded.
i	Any other planning objectives considered to be a priority for the site.	The priority for the site is to continue to deliver guest accommodation, in accordance with the planning objectives mentioned above. It is not suitable for other uses.

In addition, I note that paragraph 1.23 states that **'the Council will not seek housing or other secondary uses where they are not compatible with the primary use... where the incorporation of secondary uses would be precluded by the operational requirements of a specialised use'**. This is very clearly the case in this instance.

This paragraph also notes that **'the Council may not seek secondary uses where a development is required to accommodate an existing user on a site (for example, to provide for the expansion of a business...)'**. Again, this exception applies to this application. I can also confirm that the proposed extensions would in no way represent floor space which is additional to the Hotel's requirements, as the extensions are desperately needed to meet existing demand.

No requirement has previously been placed on applications for extensions to the Hotel in relation to Policy DP1, and this matter was also not raised in the written pre-application advice provided to the Applicant in December 2015. In relation to the 2011 application for extensions to the Hotel, the Case Officer's delegated report notes that **'The physical constraints of the existing site and its occupation by one use (hotel) do not lend itself to a mixed use development including affordable housing. Therefore in this instance it is not considered appropriate to seek to include affordable housing on the site.'**

Policy DP1 is clearly written so that it will not apply in every case. Where the application site, use and proposals are not compatible with, and do not justify any mixed use accommodation, it is not reasonable to require this. It is also not reasonable to require any financial payment for off-site provision of affordable housing. I therefore believe that my previous comments to you on this matter stand, and I would be grateful for your confirmation that no requirement for a mix of uses or a financial contribution towards affordable housing will be sought in this instance.

I look forward to discussing this application further with you in the new year.

Yours sincerely



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