



**GL Hearn**

Part of Capita Real Estate

# Planning Statement

**Idé Real Estate Ltd**

**Full Planning Permission & Listed Building Consent –  
Change of use and development to provide hotel (Class  
C1 Use)**

Carlisle House and 1 Fisher Street  
London, WC1B 4AE

May 2017

**Prepared by**

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DATE

12<sup>th</sup> May 2017

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## 1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by GL Hearn on behalf of Idé Real Estate Ltd ('the applicant') in support of an application for full planning permission & Listed Building Consent ('the/this Application') for hotel development at 8-10 Southampton Row and 1 Fisher Street, London ('the Site').
- 1.2 8-10 Southampton Row (also known as Carlisle House) is a Grade II Listed Building and is within the Kingsway Conservation Area. In accordance with the requirements of the Planning (Listed Building and Conservation Areas) Act 1990, National Planning Policy Framework and the Development Plan, the proposed development does not harm the character of the listed building, its setting or the setting of any nearby listed buildings, and preserves or enhances the character of the conservation area.
- 1.3 1 Fisher Street is the location of the 'Fisher Street Shaft' and its related single-storey 'head house' - an access shaft and supporting facilities to serve the new Crossrail line below. This part of the Site is currently under construction with completion expected by the end of 2017. This proposal therefore relates to an 'over site' development incorporating the single storey head house.
- 1.4 For clarity, 8 - 10 Southampton Row (also known as Carlisle House) is owned by London Underground Limited ('LUL') and 1Fisher Street is owned by Transport for London ('TfL'). The proposed development has been designed in collaboration with LUL and TfL, and is submitted with their full support.

### The Proposed Development

- 1.5 The proposed development comprises the conversion and change of use of 8-10 Southampton Row and development to the rear at 1 Fisher Street to create a premium lifestyle hotel (Use Class C1) with ancillary restaurant and bar.
- 1.6 For the avoidance of doubt, this Planning Statement supports both the full planning application and the Listed Building Consent application.
- 1.7 The proposed description of development is:
- "Full Planning Application and Listed Building Consent for change of use, internal and external alterations to 8-10 Southampton Row and erection of an adjoining 8-storey extension over the existing 1 Fisher Street to provide a part 7, part 9 storey hotel (Use Class C1) with ancillary restaurant and bar and associated plant, refuse and cycle storage areas."*
- 1.8 The full detail of the proposed development is set out within Section 3 of this Statement and within the Design & Access Statement, but in summary it comprises:

- Conversion and change of use of Carlisle House to a hotel (Class C1 Use) – returning the building to its original and historic use;
- The ‘over-site development’ of 1 Fisher Street, linking to the new building to 8 – 10 Southampton Row – collectively creating a 120 bedroom premium lifestyle hotel;
- An ancillary bar at ground floor – open to both guests and the public;
- An ancillary restaurant at first floor – open to both guests and the public;
- Servicing from Catton Street;
- 16 cycle parking spaces for guests and staff at basement level 1; and
- Zero car and coach parking (to be controlled through a Section 106 Agreement).

## Background to the Proposals

- 1.9 Carlisle House was formerly in use as a restaurant/pub at basement, ground and first floor with 9 residential units above until LUL purchased the Site in 2009, to accommodate a site office for the adjoining Fisher Street shaft works.
- 1.10 Presently the basement – fourth floors of Carlisle House are in use by Crossrail as their construction site offices (including shower/locker, welfare, storage, training facilities) with the upper floors being vacant (5<sup>th</sup> - 7<sup>th</sup>). The upper floors have been gutted, and to varying extents altered to accommodate structural supports for the building’s turrets which are being repaired.
- 1.11 To facilitate Crossrail’s occupation of the building and to gain access to the adjoining Fisher Street shaft a substantial amount of demolition to the rear of the building has taken place. The Design & Access Statement as well as the submitted plans demonstrate the areas of demolition.
- 1.12 Notably the works undertaken by Crossrail have included the removal of the primary means of access to the upper floors of Carlisle House and the former residential units are no longer ‘existing’, accessible or habitable.
- 1.13 In November 2013 planning permission ref. 2013/1477/P was granted at 1 Fisher Street for development comprising 22 residential units (‘the residential permission’). The planning application was submitted by Crossrail with the aim of engaging the a developer or investor to acquire the property with the benefit of planning permission. Following a period of marketing no purchaser or developer was secured and the development was determined to be commercially unviable.
- 1.14 As public bodies LUL and TfL have a requirement to secure best value in the disposal of sites acquired for the purposes of delivering Crossrail. As such, having been unable to attract a purchaser/developer for the residential permission, the Applicant was selected in 2016 to deliver the proposed hotel development.

## Environmental Impact Assessment

- 1.15 The Applicant accepts that the Application requires Environmental Impact Assessment. In accordance with Regulation 13, a Scoping Opinion has been obtained from LBC (received 7<sup>th</sup> February 2017).
- 1.16 This Planning Statement therefore accompanies, and should be read in conjunction with, an Environmental Statement and a suite of supporting technical appendices as detailed within the Schedule of Submission Documents dated 12/05/2017.

## Submission Documents

- 1.17 The Planning Application comprises the following suite of documents, in addition to this Planning Statement:
- Statement of Community Involvement;
  - Design & Access Statement;
  - Heritage Assessment;
  - Archaeology Note;
  - Ecological Impact Assessment (ECIA);
    - ECIA Figure 1
    - ECIA Figure 2
    - ECIA Figure 3
  - Energy Statement;
  - Sustainability Statement ;
  - Flood Risk Assessment;
  - Transport Statement;
  - Draft Travel Plan;
  - Waste Assessment Report;
  - Site Waste Management Plan
    - Site Waste Management Programme
  - Draft Construction Management Plan;
    - CMP Appendix (Vehicle Tracking Plan)
    - CMP Programme
    - CMP Summary Programme
  - Phase 1 Land Contamination Assessment
- 1.18 Attached to the cover letter is a Schedule of Submission Documents (dated 12/05/2017) which provides a comprehensive list of all submission documents and identifies their relevance to both the planning and Listed Building Consent applications.

## Purpose and Structure of the Statement

- 1.19 The purpose of this Statement is to provide a justification in ‘town planning’ terms for the proposed development.
- 1.20 The focus of the Statement is to establish the town planning context within which the proposed development sits. Principally the Statement focuses on land use matters and assesses the proposed development against relevant policies of the Development Plan. Topics assessed by the Environmental Statement are not repeated in this Statement, and assessment of matters such as Design, Heritage, and Sustainability are only summarised herein. As such, the full suite of submission documents should be read in full.
- 1.21 The Statement is structured as follows:
- **Section 2** sets out an overview of the Site including consideration of its wider context and relevant planning history;
  - **Section 3** describes the detail of the proposed development and summarises the response to pre-application comments;
  - **Section 4** sets out the planning policy framework against which the proposed development should be assessed;
  - **Section 5** assesses the proposals against the Development Plan, focussing on land use matters and specifically matters raised during pre-application discussions including design and heritage;
  - **Section 6** details other planning material considerations of relevance and summarises consultants reports including transport, energy and sustainability, waste, flood risk and contamination;
  - **Section 7** sets out the planning benefits of the scheme including the economic and heritage benefits; and
  - **Section 8** concludes the Planning Statement and makes clear the reasons why the scheme should be approved in line with National Planning Policy Framework and the Development Plan.

## 2 SITE & SURROUNDINGS

### The Site

2.1 The Site comprises Carlisle House and 1 Fisher Street which is currently a construction site for Crossrail. The Site is located some 100m to the north of Holborn underground station.

2.2 The Site is bounded by Fisher Street to the north, Lion Court Conference Centre to the east, Catton Street to the south and Southampton Row to the west. The Site is identified in **Figure 1** below.

**Figure 1: Aerial view of Southampton Row site (outlined in red) (Source: Google Earth)**



### 1 Fisher Street

2.3 As can be seen in Figure 1, the Fisher Street part of the Site (eastern part) has been cleared of previous buildings and is currently a construction site for Crossrail. Under the provisions of Schedule 7 to the Crossrail Act 2008, 'Plans and Specifications' approval was granted on 16 December 2011 by LBC for the Fisher Street intervention shaft and protective single-storey 'head house', which will allow emergency and maintenance access to the proposed Crossrail tunnel between Tottenham Court Road and Farringdon. As the existing site currently stands, construction is currently being undertaken by Crossrail within the intervention shaft.

### 8-10 Southampton Row (Carlisle House)

2.4 The Carlisle House part of the Site comprises a standalone eight storey (plus two basement levels) building with its entrance located on the corner of Fisher Street and Southampton Row. The



building is Grade II Listed and is currently occupied by Crossrail and used as a site office for the neighbouring development at Fisher Street.

2.5 Presently the basement – fourth floors of Carlisle House are in use by Crossrail as their construction site offices (including shower/locker, welfare, storage, training facilities) with the upper floors being unoccupied (5<sup>th</sup> - 7<sup>th</sup>). The upper floors have been gutted, and to varying extents altered to accommodate structural supports for the building's turrets which are being repaired. These floors are in continuous use by Crossrail for the purposes of maintenance and repair.

2.6 Built in 1905 Carlisle House, was designed by architectural firm Bradshaw and Gass in an Edwardian Baroque style. The building was listed Grade II on 5th May 1988. The list description reads:

*“Hotel and offices, now office block and shop. 1905-6. By Bradshaw Gass and Hope. Stone faced with steel frame. Steeply pitched slated roof to eaves with 2 levels of dormers. Freestanding to front and sides. Edwardian Baroque manner. EXTERIOR: 6 storeys plus roof storeys at 2 levels. 5 bays with corner turrets. Rusticated ground and first floors, above ashlar faced. Main entrance on left hand corner; round-headed with rusticated keystone and voussoirs, cartouche over and broken segmental pediment. Square-headed windows except to 4th floor where round-headed with heavy keys. Segmental pediments to 1st floor centre windows and continuous cast-iron balcony. Cornices above ground and first floors; main cornice above fourth floor with subsidiary cornice to fifth floor. Giant pilaster strips rising from second, through fourth floor. Corner turrets corbelled out from first floor level rising to copper covered domes. Turrets have irregular, narrow, vertically set windows. Returns with broad segmental pediment above 4th floor and tall pedimented gable above. Tall slab chimneys. INTERIOR: retains original staircase and panelling to first floor. HISTORICAL NOTE: an early example of a substantial building of steel framed construction. (The British Architect, 1 March 1907).”*

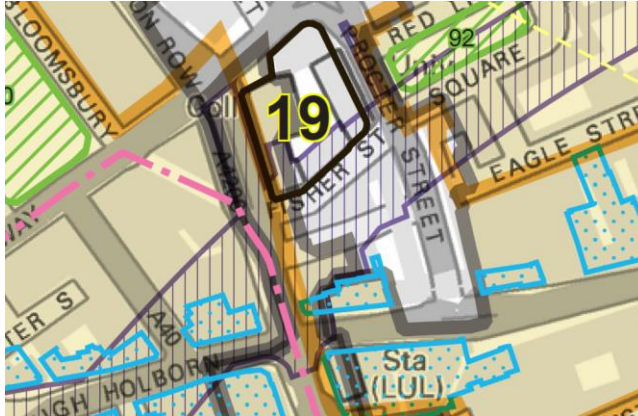
## Land Use Designations

2.7 For the purposes of applying planning policy the Site is:

- Within the Central Activities Zone;
- Within the Central London Area;
- Within the London Suburbs Archaeological Priority Area; and
- Within the Holborn Growth Area (1 Fisher Street is not within the boundary).

2.8 Figure 2 below shows the Site on the Camden Policies Map which demonstrates the above designations.

**Figure 2: Camden Policies Map extract**



### The Wider Context

- 2.9 The surrounding buildings vary in height, age and use. In the immediate surroundings, the prevailing height is between 5 – 7 storeys, with some buildings to the east increasing to between 10-13 storeys in some limited places.
- 2.10 In terms of age of the local buildings, the majority of buildings in Southampton Row/Kingsway were constructed in a relatively short period between 1900-1922, and show Edwardian style. The sites lining Kingsway were developed as a series of prestigious commercial buildings in a neo-classical style, generally uniform in materials, scale and massing and following a consistent building line. There are also a number of modern buildings featuring contemporary designs located to the east of the Site.
- 2.11 In terms of surrounding uses, the local area can be described as mixed use in nature, with typically commercial uses (Use Classes A1 and A3) at ground floor level, and office uses at upper floors. There are some residential uses within the wider area (none adjoining/adjacent to the Site), as well as a number of hotels, however the predominant land use is office. The surrounding land uses can be seen more clearly within the Design & Access Statement.

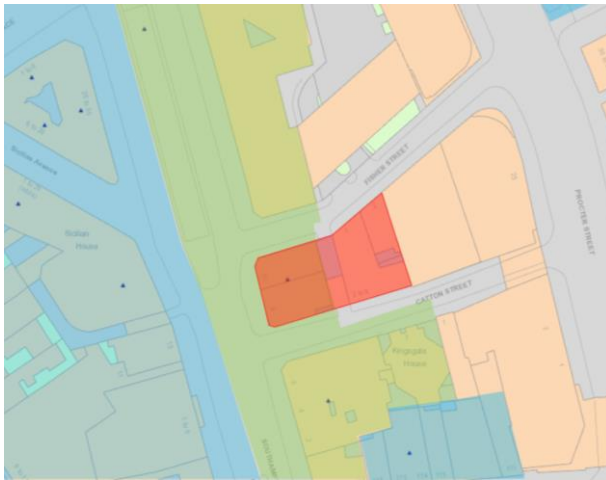
### Heritage Context

- 2.12 The Heritage Assessment provides a full overview of the Site's heritage context, but in summary, the key points are as follows:
- Carlisle House is listed Grade II, located within the Kingsway Conservation Area which ends at the rear of the building i.e. 1 Fisher Street is not in a conservation area;
  - Opposite, to the west is the Grade II Listed 15-23 Southampton Row, within the Bloomsbury Conservation Area;
  - To the south is the Grade II\* Listed Baptist Church House;

- To the north is the Grade II\* Listed Central St Martin's College of Art and Design; and
- The Kingsway Tram Subway is also Grade II Listed and forms the only underground tunnel in London specifically designed for trams. This part of the tunnel is no longer in use but the tunnel further south along Kingsway has been adapted for buses.

2.13 **Figure 3** below maps these heritage assets. Listed Buildings are marked by a blue triangle. The Kingsway Conservation Area is shown by green shading. The Bloomsbury Conservation Area is shown in blue. The application site is red.

**Figure 3: Built Heritage Context**



### Relevant Planning History

2.14 A full search of the planning history of the Site has been undertaken and is extensive, however we have detailed here the most relevant to the proposal:

- Planning Application Ref: P9603002R1 – Permission granted for the change of use to a restaurant/pub at basement, ground and first floor, with 9 residential units above;
- Planning Application Ref: 2013/1477/P – Permission granted for erection of a part 8/part 9 storey building to provide 22 residential units at the Southampton Row and Fisher Street site; and
- Planning Application Ref: 2016/2985/P - Certificate of Lawfulness of Proposed Use, seeking confirmation that the resumption of the former use of Carlisle House for A4 use at basement, ground and first floor and 9 x residential flats above would be lawful.

### Planning Application Ref: P9603002R1

2.15 On 4<sup>th</sup> November 1996, application ref: P9603002R1 was approved subject to planning conditions and a Section 106 Agreement.

2.16 The description of development was:

*“Change of use and associated works to dual uses, as defined within the Town and Country Planning (Use Classes) Order 1987: 1. Uses within Class A3 (food and drink) at basement, ground*

*and first floors, with nine residential flats at second to seventh floors; or 2. A combination of Class A1 (162 sq.m) and Class A3 (212 sq.m) uses at basement and ground floors with Class B1 offices at first to seventh floors, as shown on drawing numbers HB214/1000, 1001A, 1002, 1003A, 2001C, 2002A and 2004”.*

2.17 It is understood that the A3/residential use was occupied but later vacated following LUL purchase of the Site in 2009. Further, it should be noted that the works to the building were substantial and included the reconfiguration/replacement of the historic roof structure and an extension to the building at ground to second floors to provide an additional stair core to service the residential units (since removed).

2.18 Listed Building Consent for the external and internal work was also permitted on 4<sup>th</sup> November 1996 (ref: L9603003R1).

Planning Application Ref: 2013/1477/P

2.19 On 7<sup>th</sup> November 2013, application 2013/1477/P was approved subject to planning conditions and a Section 106 Agreement.

2.20 The description of development was:

*“Development of Crossrail site for the erection of a part 8/part 9 storey building to provide 22 residential units (Class C3) namely 5 x 1-bedroom, 14 x 2-bedroom, 2 x 3-bedroom and 1 x 4-bedroom self-contained flats with associated entrances, refuse and cycle storage and substation; alterations to ground floor facade and screening of Crossrail head house building. This application is accompanied by an Environmental Statement”.*

2.21 The key components of the development were:

- A new 8/9 storey building on the Fisher Street site;
- 22 residential units (Class C3) comprising 5 x 1 bedroom, 14 x 2-bedroom, 2 x 3 bedroom and 1 x 4 bedroom self-contained flats;
- No affordable housing provision was made either on or off site, but a financial contribution was agreed;
- The new extension was of an unusual shape and designed to meet policy requirements in respect of daylight and sunlight impacts on new residents; and
- Residential entrance and residential deliveries were proposed from Fisher Street, whilst servicing/waste collection and visits to the head house were proposed from Catton Street.

2.22 The Committee Report provides a summary of the key planning issues – most of which remain relevant to this planning application:

- **Land Use Principles** – it was acknowledged the Growth Area is a prime location for development due to its accessibility. It also welcomes development as the Site would otherwise remain undeveloped and appear as a gap in the townscape following Crossrail’s works. The

development was considered to reuse the Site in an efficient manner without negatively impacting on surrounding development;

- **Urban Design** – the proposal features a distinctive angular shaped building with faceted elevations which has been conceived in careful regard to its context. Despite the building being taller than Carlisle House, the stepped back approach was considered to be an appropriate method in separating the building from the Conservation Area and Listed Building. It was concluded that the back street location, materials and form of the building reduced the building's impact, despite its height. The approach was considered to be successful in its relationship to Carlisle House and generated an engaging piece of contemporary design which would enrich the side streets;
- **Amenity** – the building was designed to reduce the loss of daylight. The level of impact is considered acceptable for a central London location;  
In terms of noise and vibration it is considered that through the use of appropriate conditions to secure mitigation where required (incl. monitoring of internal noise levels and agreement of technical specifications of plant in the roof top area), the external noise environment where required, will result in a negligible impact on amenities;
- **Transport and Servicing** - the Site will be car free in accordance with the Development Plan. 48 covered and secure cycle parking spaces will be provided at ground floor which exceeds the required TfL level of 26 spaces. Deliveries would mainly take place from the residential entrance on Fisher Street, while refuse collections would be from a dedicated entrance on Catton Street. A CMP was provided;
- **Sustainability** – The scheme met Code for Sustainable Homes Code Level 4, which is required by Policy. The energy strategy also seeks to reduce CO2 emissions in accordance with the London Plan. The proposals include a communal heating system for the development. A gas CHP system was unfeasible. It also notes that although at the time there was no existing or proposed district heating network that would be capable of serving this area, the applicant has confirmed that provisions for future connection to any future scheme can be designed into the development. The detailed design will be secured as part of the S106; and
- **Affordable Housing** – No provision is proposed as it was considered impractical to achieve a secondary core for affordable housing. It was acknowledged that mixing the units with core market housing would be difficult and it would be problematic to identify an operator willing to take this on. Therefore no Affordable housing was proposed.  
In terms of off-site provision, as Crossrail did not have any powers to acquire sites for the purposes of affordable housing and there are no opportunities for provision in the Borough, a payment in lieu of affordable housing contribution was accepted (£850,000). The contribution would be secured by way of deferred contribution allowing the Council to receive any uplift once 50% of the units had been sold.

#### Planning Application Ref: 2016/2985/P

- 2.23 On 30<sup>th</sup> June 2016, a Certificate of Proposed Lawful Use Ref: 2016/2985/P was granted in relation to Carlisle House.
- 2.24 The description of proposed development was:  
*“Resumption of former lawful use of property as public house (A4) at basement, ground and first floor level and 9 x self-contained residential flats (C3) on the floors above (2-7)”.*
- 2.25 Notably the application is for a proposed use, not an existing use. The application sought confirmation

that the building could lawfully revert back to its former use following Crossrail's departure when works at the Fisher Street head-house finish i.e. A3/A4 use and 9 residential units.

- 2.26 The application did not consider whether in practice the building could revert to residential use, and nor did it take account of the requirement for planning permission and Listed Building Consent to be secured to grant permission for the relevant works to be undertaken. Finally the application did not consider the commercial viability of undertaking the substantial restoration works to revert back to the former uses all of which are addressed by this proposal.

### 3 THE PROPOSED DEVELOPMENT

3.1 Fundamentally, the development will involve alterations to the existing listed building at Southampton Row and an extension at Fisher Street over the Crossrail single storey head-house to provide a new hotel. The two buildings will be linked.

3.2 Specifically, the proposed development comprises:

- Conversion and change of use Carlisle House to a hotel (Class C1 Use) – returning the building to its original and historic use;
- The 'over site development' of 1 Fisher Street, linking to the new building to 8 – 10 Southampton Row – collectively creating a 120 bedroom premium lifestyle hotel;
- A total GIA of 5102 sqm (5837sqm GEA);
- An ancillary bar at ground floor – open to both guests and the public;
- An ancillary restaurant at first floor – open to both guests and the public;
- Servicing from Catton Street;
- 16 cycle parking spaces for guests and staff at basement level 1; and
- Zero car and coach parking (to be controlled through a Section 106 Agreement).

#### 8 - 10 Southampton Row

3.3 The main entrance to the hotel will be through entrance doors on the northwest corner of Carlisle House. This arrangement will utilise the existing level access to the Listed Building. Internally will be the guest lobby, reception desk and main front of house facilities.

3.4 A secondary pedestrian entrance is to be provided on the south west corner of the Site where Catton Street meets Southampton Row, utilising an existing entrance to the building. This entrance will provide access into the proposed bar area at ground floor level.

3.5 Connecting the main guest lobby and the bar area will be a ramp, enabling DDA compliant access between the two front of house areas.

3.6 At first floor level, the Listed Building will accommodate the restaurant area (148 sqm) accessed by both stairs and a lift. A back of house area/kitchen is also provided as part of the restaurant facilities.

3.7 At second to fourth floors the listed building element contains 6 hotel rooms, which have the same layout and size at each floor. At sixth floor are four rooms, and at seventh floor level are two larger rooms only.

3.8 The existing stair core is to be retained and restored, with the landings linking through to the new build element over Fisher Street.

## The Link

- 3.9 A 'lightweight' link element will connect Carlisle House and 1 Fisher Street and will be constructed from ground floor level to the seventh floor. It will provide access between the two elements and will include a lift lobby area, two guest lifts and one service lift. The stairs within the link will also extend down to the basement level.
- 3.10 The link is designed to be lightweight in appearance using glazing panels, creating a more transparent and subtle break between the Listed Building and the new building element. The Design and Access Statement provides a full description of this element of the building and the rationale for it.

## Fisher Street Extension

- 3.11 The new extension at Fisher Street will include the majority of the rooms for the 120 bedroom hotel. Access to the Fisher Street element is from Southampton Row and through the new link between the two built forms. Aside from an emergency escape to the far east of the building, there is no secondary access stair or lift in this part of the building because the shaft and head house at ground floor level prevent this.
- 3.12 At ground floor level is the head-house and intervention shaft. The head house extends across the Site between Fisher Street and Catton Street, excluding any possibility for hotel accommodation in this locality. As such, the hotel accommodation starts at first floor level, where there are 12 rooms. There are then 13 rooms per floor at second to sixth floor, and at seventh floor there are 9 rooms and 4 duplex rooms.
- 3.13 The extension is finished in a light coloured stone cladding with a vertical rhythm that picks up on the subtle verticality of the listed facade that is created by its pilasters and repetitive fenestration. The massing of the rear extension has been designed with lower floor to floor heights (suitable for hotel use) to achieve eight storeys above the retained Crossrail head-house.
- 3.14 A rusticated base at ground floor is proposed to the extension building. This section of the ground floor fronting Fisher Street and Catton Street will have the appearance of shopfronts to provide the perception of activity, and access doors to the head house.
- 3.15 The sixth and seventh floors are designed to complement the mansard level of Carlisle House, by creating a playful roofscape with serrated brass cladding. The eighth floor is designed as a setback pavilion that is finished in glass.



- 3.16 A plant enclosure is proposed on the roof of the 7<sup>th</sup> floor, to the far east of the Site. The enclosure measures three metres in height and is designed not be visible from street level.

### Listed Building Consent

- 3.17 The application also seeks listed building consent for the following broad scope of works:

#### General Works

- Removal of part of rear elevation to allow new link;
- Installation of new services (eg. electrical, plumbing and heating);

#### Basement Level 1

- Removal of stud partitions and retention of hallway lobby to allow use as staff changing area;
- New partitions for WC and cycle parking;
- New staircase from ground floor to the rear to replace the existing staircase;

#### Ground Floor

- Modern insertions stripped back;
- Revealing of original staircase by removal of Edwardian joinery;
- Interiors restored with ramp and step between two sides of the building;
- New staircase and lifts accommodated to the rear;

#### First Floor

- Retention of chimney breasts, columns, ceiling down stands and wall panelling where intact;
- New panelling in northern half of floor plate;

#### Second to Fifth Floor

- Demolish small areas of existing chimney breasts to allow for bathroom installation;
- Retention of steel frame and decorative features;
- Provide access from the retained staircase into rear linking block to rear extension at three half landings- removal of historic brickwork and two original windows;
- Removal of secondary staircase at fifth floor level and relocation into extended floorplate;

#### Sixth to Seventh Floor

- Convert sixth floor into four rooms with the seventh floor as a large suite - served by new staircase; and
- Introduction of a new slate roof with mansard style configuration to match with dormers to the rear.

- 3.18 Please refer to the Paragraph 65 onwards of the Heritage Assessment and the Design & Access Statement for full details of the works to the Listed Building.

### Stakeholder Engagement

- 3.19 The applicant has undertaken a series of pre-application meetings as follows:

- 30<sup>th</sup> November 2016: First Pre-application meeting with the Council.
- 19<sup>th</sup> January 2017: Second pre-application meeting and site visit with the Council.
- 30<sup>th</sup> March 2017: Third pre-application meeting with the Council.

3.20 The proposed development has also been subject to LBC's external Design Review Panel on 21<sup>st</sup> April 2017.

3.21 On 19th of April 2017 a public consultation event was held.

3.22 The key matters to consider resulting from these pre-application discussions are summarised in Table 1 below. A brief response is also set out in the Table, though more detail is provided in subsequent sections of this Statement and other relevant submission documents.

**Table 1: Summary of Stakeholder Feedback and Brief Responses**

Matter	Feedback	Brief Response
<b>Existing use</b>	<p>With regard to Policy DP2, the Council considers that once Crossrail vacate the building, the former residential use of the upper floors would be lawful. The applicant is asked to prove that reinstating the former residential use is unviable.</p>	<p>The residential layout of the flats at second, third and fourth floors has been removed and does not exist. The layout at the floors above this have been significantly altered. Crossrail works have also removed access to the former residential units. As such, the units do not 'exist' and Policy DP2 does not apply.</p> <p>There is no requirement for Crossrail to reinstate the former use of the building.</p> <p>The application is supported by a viability appraisal which demonstrates that the reinstatement of Carlisle House as residential is not financially viable.</p> <p>The development does not lead to a loss of residential units.</p>
<b>Proposed use</b>	<p>The proposed hotel use is considered acceptable in this location of the CAZ, Central London Area and Holborn Growth Area.</p> <p>Policy DP1 – mixed use policy – applies.</p> <p>The applicant must demonstrate that a mixed use development is not feasible and an off-site payment towards housing is acceptable in this instance.</p>	<p>A hotel use is appropriate to the site location and is promoted as such in the Council's Development Plan and emerging Local Plan.</p> <p>Due to the physical constraints of the site, such as the Listed Building, and the extent of the head-house and shaft, it is not feasible to provide residential use on site.</p> <p>The Design and Access Statement provides diagrammatic assessment of how hotel and residential uses cannot be provided together.</p> <p>The viability assessment confirms that a mixed used development is not financially viable.</p> <p>The applicant confirms that off-site payment towards housing can be provided.</p>
<b>Height</b>	<p>Height of the extension building (1 Fisher Street) was considered excessive and over dominant in comparison to the existing Listed</p>	<p>The top floor of the development has been greatly reduced to minimise its visual impact on the setting of the Listed Building and views into the Conservation Area.</p>

	Building.	The overall height of the development has been decreased resulting in a reduction of hotel bedrooms.
<b>Scale and massing</b>	Overall scale and mass of the building to be reduced to improve the relationship to the Listed Building.	<p>The scale and massing of the upper floors (6-8) of the building has been reduced.</p> <p>The 6<sup>th</sup> and 7<sup>th</sup> floors feature serrated brass cladding and at 8<sup>th</sup> floor, the building is set back from the parapet and represents as a glass pavilion.</p> <p>The north western corner of the building has been chamfered to reduce the bulk and mass of the building from views from Red Lion Square.</p>
<b>Link</b>	Further details of the link are required. Due to the lift within the link, its height is considered overly dominant to the Listed Building.	<p>The Design and Access Statement and proposed plans, sections and elevations now provides full details of the link.</p> <p>The link has been reduced in height by terminating the lift at 7<sup>th</sup> floor level .</p>
<b>Materials</b>	<p>Proposed materials considered to blend in with rather than compliment and contrast with those existing surrounding the site.</p> <p>Top part of the building initially considered to be heavy in material. More interest requested in façade materials.</p>	<p>The materials palette has been refined to provide a high quality, simple and elegant finish to the building.</p> <p>The extension at Fisher Street is tripartite in appearance, better reflecting the proportions of the Listed Building.</p> <p>Brass cladding has been added at 6<sup>th</sup> and 7<sup>th</sup> floors to provide visual interest and to set the building apart from / compliment the Listed Building.</p>
<b>Servicing</b>	<p>Servicing from Catton Street was agreed.</p> <p>Taxi drop off from Southampton Row is accepted, and subject to a Section 106 Agreement, zero coach parking is also supported.</p> <p>Sufficient storage for cycle should also be provided on site.</p>	<p>On-site servicing is not possible due to the physical constraints of the Site, and on street servicing on Catton Street is therefore proposed.</p> <p>A Section 106 Agreement is proposed to include the restriction of coach parking/prevent coach party bookings at the hotel.</p> <p>Cycle parking is provided on site.</p> <p>The transport strategy for the development is agreed with officers.</p>

## **4 PLANNING POLICY FRAMEWORK**

- 4.1 This Section sets out the planning policy framework against which the proposed development should be assessed. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 Legislation relating to Listed Buildings and Conservation Areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Act places a duty on the decision maker to have special regard to the desirability of preserving Listed Buildings and their settings. Section 72 of the Act places a similar duty on the decision maker to pay special attention to the desirability of preserving or enhancing the character and appearance of Conservation Areas. The 1990 Act is to be given considerable importance and weight in the planning process. The presumptions in the 1990 Act will become less strong the smaller the effect or the lower the significance of the asset.
- 4.3 For the purpose of assessing the proposed development, the current Development Plan comprises:
- The London Plan (2016);
  - Camden Core Strategy (2010); and
  - Camden Development Policies (2010).
- 4.4 The Council is also preparing a new Local Plan which reviews the current planning policies and will replace the Core Strategy and Development Policies Documents. It will cover a period from 2016 to 2031. The Council submitted the Camden Local Plan Submission Draft to the Secretary of State on 24<sup>th</sup> June 2016. Main Modifications to the Local Plan were consulted on between 30<sup>th</sup> January and 13<sup>th</sup> March 2017 in light of the Inspector's comments made during the examination and public representations. Although not yet adopted, the emerging planning policy has been considered in the assessment of the proposals.
- 4.5 The National Planning Policy Framework (NPPF) (2012) provides the overarching planning guidance to which all Development Plan Documents must conform and as such, it is a material consideration of considerable weight.
- 4.6 At the heart of the NPPF is a presumption in favour of sustainable development. For making planning decisions that means approving development proposals that accord with the Development Plan without delay.
- 4.7 Paragraph 7 states that:

*“There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:*

- 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.”*

4.8 The NPPF provides guidance on all of the other key planning considerations for the purposes of this application as set out in the following Section, including heritage, design, transportation, town centre uses etc.

4.9 Other material considerations include the following Camden Planning Guidance :

- CPG 1 Design (2015);
- CPG 2 Housing (2016);
- CPG 3 Sustainability (2015);
- CPG 7 Transport (2011); and
- CPG 8 Planning Obligations (2015).

4.10 The key policies within these documents will be discussed in more detail in Section 5 of this Planning Statement in the context of the proposed development.

## 5 PLANNING ASSESSMENT

5.1 This Section assesses the key planning issues that were identified through pre-application discussion, and against the planning policy framework outlined in Section 5, as follows:

- Principle of development;
- Principle of hotel use;
- Existing use of the Site;
- Mixed use development; and
- Heritage & design.

5.2 Other planning issues that are relevant are addressed in Section 6.

### Principle of Development

5.3 The Site comprises a Grade II Listed Building and a cleared site accommodating the Fisher Street Crossrail shaft and head-house. The Site is located within both the Central Activities Zone, the Central London Area and the Holborn Growth Area, and in such locations there is clear support for proposals that make best use of land (Policy CS1, CS2, NPPF Paragraph 17).

5.4 On completion of Crossrail, TfL is required to dispose of sites in the most efficient means and generate best value. In 2013 planning permission (ref. 2013/1477/P) was secured for over site development at 1 Fisher Street, comprising 22 residential apartments, up to nine storeys in height. The permission remains extant. This permission establishes the principle of development above the Crossrail head house on the Fisher Street element of the Site.

5.5 In respect of the Listed Building, and indeed its location within a Conservation Area, Paragraph 131 of the NPPF requires local planning authorities to have regard to the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution that conservation of heritage assets can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness.

5.6 Paragraph 132 of the NPPF applies specifically to designated heritage assets. It states that great weight should be given to their conservation and it requires a proportionate approach (i.e. the more important the asset, the greater the weight attached to its conservation).

5.7 Conservation (for heritage policy) is defined in Annex 2 of the NPPF as:

*“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”*

- 5.8 The importance and relevance of this definition is that it does not suggest conservation to be the same as preservation. Indeed, what sets conservation apart is the emphasis on proactively managing change and not on a reactive approach to resisting it.
- 5.9 The Development Plan reflects the approach set out in the NPPF in respect of heritage assets and therefore having regard to the above, there is support in principle for the sensitive conversion of the Listed Building and development of 1 Fisher Street.

### Principle of Hotel Use

- 5.10 Within the London Plan, Holborn is identified as an Intensification Area where further sustainable economic development is encouraged. At the local level, the Site is located within the Holborn Growth Area, Central London Area and the Central Activities Zone ('CAZ').
- 5.11 London Plan Policy 4.5 (London's Visitor Infrastructure) seeks to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. The policy also seeks to ensure that new visitor accommodation is delivered in appropriate locations, specifically within the CAZ and in areas with high levels of accessibility by public transport.
- 5.12 Core Strategy Policy CS9 establishes the Central London Area and provides support for hotels within this location in principle. The policy also defines Holborn as a growth area (as shown on the policies map at Figure 3 above) where development should contribute to London's economic, social and cultural role.
- 5.13 Part C of Policy CS9 seeks to ensure that the growth areas, including Holborn, contribute to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life.
- 5.14 In addition, Policy DP14 (Development Policies Document) provides general support for hotels in accessible locations, where servicing can be addressed successfully and residential amenity is not harmed. Specifically the policy (DP14 (a)) expects new large scale tourism accommodation to be located in the Central London Area, including the Holborn Growth Area.
- 5.15 Policy CS8 seeks to promote a successful and inclusive Camden economy and in particular part e) seeks to support the development of the tourism sector. The Policy acknowledges the importance of tourism as an employment generating use.
- 5.16 In this regard, Paragraphs 18 and 19 of the NPPF are particularly relevant whereby the Government makes clear that significant weight should be placed on the need to support economic growth in order to create jobs and prosperity.



- 5.17 Having regard to the above policies, it is evident that in terms of location, the proposed development is policy compliant. The Site is located within the CAZ, the Central London Area, the Holborn Growth Area and has a PTAL rating of 6b. It is precisely such locations where the Development Plan seeks to support hotel development. Further, the creation of jobs and the wider support for Camden's tourism economy generated by the proposed development is also in accordance with the Development Plan. The Council's pre-application response in December 2016 confirms this position.
- 5.18 With regard to the need for additional hotel accommodation in Holborn, the London Plan makes clear that there is a strategic need for additional hotel accommodation in the most sustainable and accessible locations in London. Notably the London Plan does not distinguish between the type of accommodation that is required.
- 5.19 The development seeks to create a premium lifestyle hotel with ancillary bar and restaurant that will be accessible to the public as well as guests. At Appendix 8 and 12 of the Viability Assessment is an appraisal prepared by Whitebridge Hospitality ('Whitebridge') which supports the proposed hotel in commercial terms, having regard to local supply and demand of hotel accommodation and other locational factors.
- 5.20 Whitebridge explain that the Holborn location benefits from excellent connectivity and easy access to London's main shopping and entertainment areas, and to leading visitor attractions, therefore being ideally located for a premium lifestyle hotel.
- 5.21 Carlisle House lends itself well to conversion in to a premium lifestyle hotel with destination dining, particularly because the historic use of the building was as a hotel, but also because the Site is located in an area that is undergoing significant development and regeneration. The proposed concept fills a gap in the market place, between luxury (Rosewood and L'Oscar), full service traditional business hotels to the north (Doubletree, Grange Holborn) and the select service offerings (Citadines and The Hoxton).
- 5.22 In summary, though there is competition locally from other hotels, it is expected that the proposed development will be commercially successful, filling a gap in the market, and offering something new to the Holborn Area, in accordance with the overarching aspirations for the growth of the area, as set out in Policies CS1 and CS2.
- 5.23 In addition to the planning policies seeking to direct hotel development to central, sustainable and accessible locations, Policy DP14 also sets that: *"all tourism development and visitor accommodation must: d) be easily reached by public transport; e) provide any necessary off-highway pickup and set down points for taxis and coaches; f) not harm the balance and mix of uses*

*in the area, local character, residential amenity, services for the local community, the environment or transport systems.” As such, each of these points is addressed below.*

#### **Easily reached by public transport**

- 5.24 The Site is classed as PTAL 6b, and as such is given the highest rating in terms of public transport accessibility. The Site is approximately 100m walking distance from Holborn underground station as well as being nearby to Tottenham Court Road and Chancery Lane stations. In addition there are approximately 165 buses per hour servicing the Site during the daytime, many of which connect to the main transportation hubs in London. Further, Southampton Row is easily accessible to taxis, adding a further dimension to the Site’s accessibility.
- 5.25 Evidently the Site is located in a highly accessible location and complies with Policy DP14 d) in this regard.

#### **Provide any necessary off-highway pickup and set down points for taxis and coaches**

- 5.26 This point has been discussed at pre-application stage with the Council. The constraints of the Site mean there is no opportunity for taxi drop off or coach parking on site, though the high level of accessibility of the Site, mitigates this.
- 5.27 Through pre-application discussions it has been agreed taxis should serve the Site by dropping off passengers on Fisher Street, though no formal taxi bays are required.
- 5.28 In terms of coaches, for clarity, the hotel is to be of a premium lifestyle offer which is not intended for large groups of tourists/coach parties. As such, in accordance with paragraph 14.5 of the Development Management Policies, it has been agreed with Officers that a Section 106 Agreement will be secured which prevents coach party bookings at the hotel.

#### **Not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems.**

- 5.29 A land use map is provided within the Design & Access Statement demonstrating that there is an existing mix of uses in the area, though primarily commercial and cultural in nature. Broadly, Southampton Row features retail uses at ground floor with other commercial uses (typically office accommodation) above. It is noted that there are a number of other hotels in proximity on Southampton Row but all are of a different ‘offer’ to that proposed, and not present in such a number so as to skew the mix and balance of uses locally.
- 5.30 In this context, the proposed hotel use will respect the existing balance of uses in the local area, adding to the mix rather than creating an over concentration. As outlined above, the hotel offer is to

fill an identified gap in the type of hotel provision locally. Furthermore, as identified through the Development Plan, the tourism economy is important to Camden and development which positively contributes to tourism growth within the Holborn Area and the CAZ is to be supported. The type of guest expected at the proposed development is highly likely to use the local cultural amenities, restaurants and cafes etc, and overall the economic benefit of the proposed development will be positive. As outlined in Section 7 of this Statement, when operational it is expected that the hotel could generate an estimated £4.5 million in the local economy.

- 5.31 The local character can be described as varied, however as the Site is located (in part) within a Conservation Area, and with a number of Listed Buildings in the nearby vicinity, it is acknowledged that the local area has a historical character and importance. Notably when Carlisle House was built, it was as a hotel which indicates that the area has historically been seen as a suitable and desirable location for such uses. The proposal has been therefore carefully designed to sustain and enhance local heritage assets, through discussion with the Council at pre-application stage.
- 5.32 There is limited residential use in the immediate vicinity and as such the impact on residential amenity is negligible. Given the scheme includes only 120 hotel rooms with ancillary restaurant and bar, it is considered that the proposal will not negatively affect local services, the local transport system, nor the environment. The Transport Statement and Sustainability Statement submitted with this application provide further justification for the development in this regard.

Overall it is clear that in terms of the site's location, the scale and nature of the proposed hotel, and with regard to matters such as accessibility, impact on local services and the highways network, the proposed development fully accords with the Development Plan and should be supported in principle.

### The Existing Use of the Site

#### 8-10 Southampton Row

- 5.33 In terms of the change of use of Carlisle House, within the Core Strategy, Policy CS6 seeks to 'minimise' the net loss of 'existing' homes and further, it establishes housing as the priority land use for the Borough. Paragraph 6.18 goes on to acknowledge that the priority given to housing does not override other considerations, but will be considered alongside them, such as the need for jobs, services and facilities, and the importance of Central London as a focus of business, shopping, education, healthcare and research.
- 5.34 Policy DP2 is particularly relevant. It seeks to make full use of Camden's capacity for housing, in part, through "minimising" the loss of housing in the Borough by protecting residential uses from development that would involve a net loss of existing residential floorspace (DP2 (d)). Further, DP2

(e) seeks to protect “permanent” housing from conversion to short stay accommodation, DP2 (f) resists developments that would result in the loss of 2 or more homes. Notably emerging Policy H3 reflects these policy requirements.

- 5.35 As outlined above, Carlisle House is currently occupied by Crossrail as a site office and welfare facilities associated with the construction of the Fisher Street shaft and head-house at 1 Fisher Street. The residential floorspace was last occupied approximately 8 years ago in 2009, when LUL bought the building for the purposes of delivering Crossrail.
- 5.36 For clarity, ‘Plans and Specifications’ approval was granted on 16 December 2011 by LBC for the Fisher Street intervention shaft and protective head house allowing Crossrail to occupy the Site for construction purposes under the Crossrail Act. The approval also enabled Carlisle House to be occupied by Crossrail and used as site offices, in effect, ceasing the residential use of the upper floors and the A4 use of the ground and basement.
- 5.37 Today, Carlisle House remains occupied by Crossrail for construction purposes. As described in Section 2, the basement levels are currently being used as welfare facilities (showers/lockers). The ground floor provides site access, and first floor is currently a canteen area and kit storage/locker room. Second - fourth floors are offices, with the layouts, fixtures and fittings of the former residential units having been totally removed.
- 5.38 The upper levels are unoccupied (5<sup>th</sup> - 7<sup>th</sup>), have been gutted, and to varying extents altered to accommodate structural supports for the building’s turrets which are being repaired. These floors are in continuous use by Crossrail for the purposes of maintenance and repair.
- 5.39 Following the grant of planning permission (ref. 2013/1477/P) in November 2013 for a 22 unit residential development at 1 Fisher Street, a Certificate of Lawfulness for a Proposed Use (‘CLOPUD’) (ref. 2016/2985/P) was granted in 2016 for resumption of the former lawful use of Carlisle House i.e. A4 use at the basement, ground and first floor and 9 x residential flats above.
- 5.40 The legal function of the CLOPUD was not to confirm the *existing* use but rather to confirm the lawfulness of the *proposed* use.
- 5.41 It is clear that DP2 parts d) e) and f) apply to the loss of homes which are in existing use, i.e. homes which are either in occupation for residential purposes or which are physically in existence and capable of being beneficially occupied without significant legal or physical restraints. It is therefore considered that neither an unimplemented planning permission (ref. 2013/1477/P) nor the existence of a CLOPUD engages parts d) e) or f) of Policy DP2.
- 5.42 Notwithstanding this, the following points are important material considerations in respect of:

- Carlisle House is in use as site accommodation for Crossrail, and is not in existing residential use;
- layout of the flats at second, third and fourth floors has been entirely removed and cannot be said to exist;
- the former units at the upper floors have been gutted and are not habitable, therefore are not considered existing floorspace;
- the means of access to the upper floors has been removed as part of the works undertaken by Crossrail. As such the former flats could not be occupied without the reinstatement of the access, as well as significant works to the internal fabric of the building;
- Accessing the flats using a shared core with the A4 use at ground and first floor would be contrary to Building Regulations;
- To reinstate the former use of the building Listed Building Consent and in part, planning permission, would be required;
- As demonstrated by the Viability Assessment supporting the planning application, the reinstatement of the building to provide 9 residential units and the A4 unit is not financially viable; and
- There is no requirement to reinstate Carlisle House to its former use under the Crossrail Act.

5.43 In this context, we consider that the development does not involve the net loss of existing residential floorspace; involve the net loss of two or more homes; nor convert existing residential units to short stay accommodation. As such, the proposed development is in compliance with Policy DP2 d) e) and f), and emerging Policy H3. This position has been agreed with Officers through the pre-application discussions, subject to third party review of the Viability Assessment.

#### 1 Fisher Street

5.44 In terms of the existing use of 1 Fisher Street, as outlined above, it is currently a construction site for the Fisher Street shaft and head-house. The construction works are due for completion at the end of 2017. In considering a hotel use for the Site on completion of the works, Policy DP2 parts a), b) and c) are relevant. These state that the:

5.45 *“Council will seek to maximise the supply of additional homes in the borough...by:*

*a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site;*

*b) Resisting alternative development of sites considered particularly suitable for housing; and*

*c) Resisting alternative development of sites or parts of sites considered particularly suitable for affordable housing, homes for older people or homes for vulnerable people.”*

5.46 The supporting text at Paragraph 2.11 states that the Council may resist non-housing development on sites that either have a valid consent for housing, or are suitable for housing in terms of

accessibility and amenity, and are free of physical and environmental constraints that would prevent residential use.

5.47 Paragraph 2.12 sets out that the Council will take into account the financial viability of the proposal and the financial viability of housing development. The Council will also consider whether the supply of additional housing falls short of the overall target of additional self-contained homes per year.

5.48 1 Fisher Street benefits from an extant planning permission (ref: 2013/1477/P) for 22 residential units, with an off-site financial contribution towards affordable housing. However, the Site was then unsuccessfully marketed with the benefit of planning permission, without substantive interest. It is therefore considered that the permission is undeliverable due to factors including:

- its unconventional design and the associated higher cost of construction;
- the scale of the development – it was not attractive to either smaller housebuilders or the larger volume builders;
- the position over the head house and shaft creating increased risk to housebuilders, discouraging a site purchase;
- the head-house and shaft create a physical site constraint which greatly restricts the ability to design a better housing scheme for the Site;
- the Central London residential market has declined, reducing interest from housebuilders for small scale, risky, constrained/difficult development sites; and
- the scheme was considered financially unviable.

5.49 It must also be considered that the Site cannot be viewed as ‘vacant’, as the single storey head-house will occupy the Site in future (it is almost completed) and this has consequences for the type, and form of development that sits above and around it. Given the head-house and shaft, the Site cannot be viewed as a ‘typical’ central London housing site, and as is evident from the lack of purchaser, the complexity and cost of delivering a small/medium housing scheme in such a constrained site and predominantly commercial area should not be underestimated.

5.50 As a consequence of the above, in order to achieve best value for the Site on completion of the works, Crossrail has, in collaboration with the Applicant, sought an alternative and more suitable and viable use of the Site – i.e. a hotel.

5.51 Planning policy identifies a strategic need for hotels in London and specifically directs hotels to the CAZ, the Central London Area, to the Holborn Growth Area, and to areas of the high transport accessibility. The application site complies with all of these criteria and is therefore ideally suited to a hotel. It is considered that notwithstanding that residential permission has been granted on part of the Site, a hotel development in this location would be more appropriate use of land given its central location and mixed-use (predominantly-commercial) context.

5.52 The hotel will create jobs which would be suitable for the residents of the Borough of Camden, and indirectly, the hotel will support the London economy and the range of cultural, entertainments, and commercial facilities locally. The development will therefore deliver on many of the objectives set out within the Core Strategy (Policy CS9).

5.53 In terms of how the hotel development could impact upon Camden's ability to meet its housing needs targets, the most recent Authority Monitoring Report 2014/2015 is relevant. This states that the housing trajectory target and net additional dwellings target for the reporting year have been met, and that the Council is on course to meet the net additional dwellings target in future years including the five year land supply. As such the supply of housing is not a reason to resist a non-housing development, in accordance with Paragraph 2.12.

### Mixed Use Development

5.54 Having established that the proposed hotel is the most appropriate use for the Site, we turn now to Policy DP1 which seeks mixed use development within the Central London Area, whereby up to 50% of net additional floorspace over 200 sqm is sought to be residential.

5.55 As has been agreed with Officers through the pre-application process, in this instance, due to the physical constraints of the Site, it is not feasible or appropriate to deliver housing as well as the hotel and ancillary restaurant uses as part of the development. Below we provide justification for this having regard to the following criteria, taken from Policy DP1:

- the character of the development, the Site and the area;
- site size, the extent of the additional floorspace, and constraints on including a mix of uses;
- the need for an active street frontage and natural surveillance;
- the economics and financial viability of the development including any particular costs associated with it;
- whether the sole or primary use proposed is housing;
- whether secondary uses would be incompatible with the character of the primary use;
- whether an extension to the gross floorspace is needed for an existing user;
- whether the development is publicly funded;
- any other planning objectives considered to be a priority for the Site.

### Character of the development, the Site and the area

5.56 The proposed development is to deliver a new premium lifestyle hotel to Holborn. The historic interest of the Listed Building will be a key attraction for the hotel, with bedrooms and facilities in this part of the development benefitting from a special character and drawing an increased Average Day Rate ('ADR').

- 5.57 The Listed Building was originally constructed as a hotel and the proposed development therefore has the significant heritage benefit of reinstating the original use. Therefore the retained and restored features can be experienced and enjoyed by the public and all who use the building either as hotel occupiers or as bar/restaurant customers.
- 5.58 The new build element at 1 Fisher Street will adjoin the Listed Building via a new link structure, and abut the boundary of the Conservation Area. The development takes account of these heritage factors and the scheme has been carefully designed to be sensitive to them as shown through the scheme progression details outlined in the Design & Access Statement and Heritage Assessment. This has been achievable through provision of a single hotel use on the Site, as less internal configuration and alteration is required, as opposed to a mixed-use hotel and residential development.
- 5.59 More widely, the character of the area is mixed but as demonstrated in the Design & Access Statement, it is predominantly commercial in nature with very limited residential premises in proximity to the Site. To the north of the Site is an educational use, to the south is a hotel development (under construction) and offices, and opposite the Site to the west, and again to the east are further office buildings. In this context, it is considered that a commercial use (a hotel) would be more appropriate than residential, which requires greater levels of amenity protection, in this instance.
- 5.60 As outlined earlier, it is clear that planning policies direct hotels to the CAZ, the Holborn Growth Area and the Central London Area. Such development is not necessarily achievable elsewhere, and therefore, in order to meet the strategic need for hotels; opportunities such as the proposed development located in the most appropriate areas, should be supported.

**Site size, the extent of the additional floorspace, and constraints on including a mix of uses**

- 5.61 The Site is contained by Southampton Row to the west, Catton Street to the south, Red Lion Conference Centre to the east and Fisher Street to the north. The Site therefore forms an 'island' measuring some 0.14ha.
- 5.62 Within the Site, the retained Listed Building occupies about 40% (approx.) of the Site area, leaving just 60% (approx.) to be developed. A requirement of the development is to accommodate the Fisher Street shaft and single storey head-house (including clear street access / egress). As shown on the proposed floorplans, the facilities occupy the large majority of the ground floor of the Fisher Street part of the Site. These facilities need 24/7 access, cannot be amended in design and are therefore a further fixed constraint on the future development of the Site, especially in respect of development at ground floor level, and therefore potential access points to the proposed building.



- 5.63 A further constraint to take into consideration is that to serve the proposed development, a substation is required. This generates certain spatial requirements that must be adhered to.
- 5.64 The existing listed building comprises 2,062 sq.m (GEA) and the head-house to the shaft comprises 262 sq.m (GEA). The total new floorspace (GEA) created by the development is 3,812 sq.m (GEA). Therefore the total development will create 5,837sq.m of GEA floorspace (5,102sqm GIA). With regard to policy DP1, there could therefore be a requirement for up to 2,918sq.m (GEA) of housing to be delivered on site (i.e. 50% of the new build).
- 5.65 In the interests of considering Policy DP1 the applicant has considered the possibility of providing a mixed use scheme to incorporate residential use on the site and this is reflected diagrammatically within the Design and Access Statement. The potential of these options has been reviewed in line with national and local guidance on space and access requirements for both residential and hotel uses, and as outlined by Policy DP1, each use within a building must be accessed and operated independently. Indeed this is a fundamental commercial requirement of the intended hotel operator.
- 5.66 The principle constraints on the Site are as outlined above (i.e. fixed dimensions and locations for the head house, shaft and substation). The design of the head-house is entirely fixed and its construction is now nearing completion.
- 5.67 The hotel use requires sufficient space for back of house uses such as kitchens, storage, staff welfare facilities, office, servicing etc. The amount of space required for such facilities is to a degree dictated by the level of service offered by the hotel (i.e. the higher the service the more the space required for back of house facilities etc). To provide sufficient circulation and emergency escape routes, the hotel requires at least two lifts, and two stair cores. Presently these are located in the link element, and to the far east of the new build element (i.e. either side of the head-house).
- 5.68 To deliver housing as part of the hotel development would require the installation of at least one separate access and core, separate cycle storage, separate refuse storage, and separate means of power.
- 5.69 As is demonstrated within the Design & Access Statement, the minimum dimensions for the residential requirements (stair core, refuse area etc.) as set by the Housing SPG (2016) cannot be accommodated within the highly constrained ground floor, in addition to the hotel use.
- 5.70 Given the above, a mixed use scheme has not been considered further. However, even assuming that the issues at ground floor level were resolved, due to the form and layout of the building, the residential accommodation to be provided would suffer from design issues such as single aspect units, be very deep plan with insufficient daylight/sunlight levels. The development would therefore

not comply with the requirements set out by both Camden's Design Guidance, nor the Housing Design Guide (2016).

5.71 In this context, it considered sufficiently demonstrated that the physical constraints of the Site mean that a mixed use development to include hotel and residential uses is not feasible.

5.72 It is notable that the a single use scheme was agreed for the 2013 permission which suffered from the same site constraints, and requirements for uses to benefit from dedicated accesses, circulation cores and other services/facilities.

### **The need for an active street frontage and natural surveillance**

5.73 The 2013 permission establishes that such issues can be adequately addressed through a single use (residential) scheme, though evidently the Ste's constraints impact upon the design and layout of any over site development.

5.74 The proposed development is designed such that the hotel will face out onto the street wherever possible. The main entrances to the hotel and bar are from Southampton Row, refurbishing the listed building and restoring the building's frontages to the street in the process. The Fisher Street and Catton Street frontages are of less importance, and therefore activity is restricted to back of house/servicing/secondary activities. Nonetheless, hotel rooms will have windows onto either Catton Street or Fisher Street and as such, passive surveillance can take place and the sense of activity within the building will be evident.

5.75 In regards to creating an active frontage along Catton Street and Fisher Street to the rear part of the site, this was discussed at pre-application stage, however it was accepted that due to the head-house, it is not possible to provide an active frontage at ground floor level. Notwithstanding this, the scheme has been designed to incorporate false 'shop windows' to give the appearance of an active frontage and add visual interest where possible to the ground floor.

### **Financial viability of the development**

5.76 In terms of the financial viability of providing a mixed use development, combining residential and hotel uses on site, this has been assessed by GL Hearn with input from Whitebridge – who have advised specifically on hotel matters. The Assessment considers a number of options for the Site including a mixed use scheme which creates 90hotel rooms with ancillary restaurant and bar, and the equivalent floorspace of 9 residential units (based upon the quantum of floorspace in Southampton Row formerly in residential use). The equivalent floorspace was used as the basis of the viability assessment because, as outlined above, it is not physically feasible to design a mixed use scheme given the constraints of the Site.

- 5.77 For the hotel use to be viable, a certain number of bedrooms must be delivered. At 120 (as proposed) the development is already at the lower end of what is viable for the Site. Evidently, the introduction of residential use (taking account of the various spatial requirements) to the development would reduce the number of rooms, and increase cost for example, by the requirement of an additional core.
- 5.78 The restoration of the Listed Building as part of the development make the cost of the scheme higher than in other circumstances, and this is an important consideration. Finally, the additional pressure on space created by a mixed use scheme would also compromise the layout of the hotel such that it would be unviable in an operational capacity.
- 5.79 In this context, the Viability Assessment concludes that a mixed use scheme, providing hotel and residential on site, is not financially viable.

#### **Incompatible uses**

- 5.80 Combining both residential and hotel uses in a single building on a relatively small plot could lead to operational difficulties and impacts upon amenity. The impacts could be mutual with, for example, guest/residents making noise within the building. If a guest makes noise, it is within the operators control to manage the guest. If the noise issue arises from a residential unit and disturbs a guest, there is limited action the operator can take. A large part of a hotel's success is how comfortable their guests' stay is, noise disturbance is a key issue in this regard.
- 5.81 Furthermore, given that hotel and residential guests may have to share some form of access/egress, this is fundamentally unattractive to hotel operators. The hotel must manage security, fire, health and safety risks, and combining with an additional use that is not in the hotel's control would not be acceptable to operators.
- 5.82 In terms of servicing, it is in the operator's interest to manage this in such a way that avoids disturbance to a guest (or resident). Service Management Plans are a typical means of controlling impacts arising from servicing. The Site is in a commercial area and is surrounded by offices, educational and hotel uses. There appear to be very limited residential properties in immediate proximity to the Site. Increasing servicing activity in the area and simultaneously introducing residential to a constrained site could well lead to conflicts in uses.

#### **Other planning objectives for the Site**

- 5.83 As outlined above, restoring the Listed Building to its original purposes as a hotel is an important planning consideration for the Site. The Site is not specifically allocated for a particular land use. As a hotel use (a defined 'main town centre use') it is entirely appropriate in this central and accessible location.

- 5.84 Furthermore, it is to be noted that planning policy identifies a strategic need for hotels in London and specifically directs hotels to the CAZ, the Central London Area, to the Holborn Growth Area, and to areas of the high transport accessibility. The application site complies with all of these criteria and is therefore ideally suited to a hotel. However, the introduction of residential uses to the proposed development would not be appropriate in this instance.
- 5.85 It should also be noted that the hotel will create jobs which would be suitable for the residents of the Borough of Camden, and indirectly, the hotel will support the London economy and the range of cultural, entertainments, and commercial facilities locally. The development will therefore deliver on many of the objectives set out within the Core Strategy (Policy CS9).
- 5.86 As outlined in DP1, where on site provision of housing cannot be provided it is an option to provide a payment in lieu of housing. The Applicant does not have any other land holdings within the Borough where a housing provision could be made off-site, and therefore an offsite payment would be acceptable in this instance subject to financial viability considerations.

## Design

- 5.87 Paragraph 56 of the NPPF sets out that the Government attaches great importance to the design of the built environment given that it is a key aspect of sustainable development. High quality and inclusive design are required; however, Paragraph 61 states that inclusive design goes beyond aesthetic considerations and should also address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 5.88 Paragraph 64 identifies that great weight should be given to outstanding or innovative designs which help raise the standard of design in the area, and Paragraph 60 identifies that it is proper to seek to promote or reinforce local distinctiveness, however decisions should not try to impose architectural styles or particular tastes and should not stifle innovation or originality.
- 5.89 The design principles set out in the NPPF are also reflected in Camden's local policy documents as well as CPG 1 on Design. Core Strategy Policy CS14 sets out that Camden's places and buildings should be attractive, safe and easy to use. Development should be of a highest standard and respect local context and character. This is reiterated by Development Policy DP24 which considers the character, setting, context, materials, frontages and accessibility will all be considered.
- 5.90 The project is a unique opportunity to restore the existing nationally Listed Carlisle House to its original use of a hotel. It also presents a rational approach of adding a new build extension over the Crossrail site at 1 Fisher Street.

- 5.91 An analysis of the surrounding context and the impact on the listed building and the adjacent conservation areas has informed and shaped the proposed design. Through in-depth streetscape studies from critical view points, the form and massing has been sculpted to ensure that the new build extension would be subservient to the listed building and has a complementary relationship to the surrounding context.
- 5.92 Carlisle House is a flamboyant Edwardian stone faced, steel framed building with a total of 8 floors, of which the top two floors consist of a mansard and dormer roof form. The massing of the rear extension has been designed with lower floor to floor heights (suitable for hotel use) to achieve eight storeys above the retained Crossrail head house facility at the ground floor. The eighth floor is designed as a setback pavilion that is finished in glass. The eighth floor is sufficiently setback that its visibility is limited at street level and from key viewpoints such as Red Lion Square and Southampton Row.
- 5.93 The sixth and seventh floors are designed to complement the mansard level of Carlisle House, by creating a playful roofscape with its brass clad serrated appearance.
- 5.94 The body of the new build extension is finished in a light coloured stone cladding with a vertical rhythm that picks up on the subtle verticality of the listed facade that is created by its pilasters and repetitive fenestration. The colour of stone cladding to the rear extension is lighter than the Listed Building to allow the Listed Building to have a more prominent presence on the street.
- 5.95 To complete the tripartite hierarchy, akin to Carlisle House, a rusticated based at ground floor is proposed to the extension building. This section of the ground floor fronting Fisher and Catton Street will have the appearance of 'shopfronts' to give the impression of activity, and access doors to the head house.
- 5.96 The link between the Listed Building and the new build rear extension is connected by a glazed circulation core that serves both the front and rear buildings. The location of this link is strategically placed to enable universal accessibility to the two wings that have differing floor levels. This link terminates at the seventh floor allowing for a more sensitive relationship between the old and new buildings of eight storeys.
- 5.97 The layout of the hotel has been informed by the architect's in depth understanding of hotel design and operators' requirements for the efficient and logical flow within a hotel. The circulation strategy is also designed to take into account the parameters of the Crossrail shaft.
- 5.98 A large extent of the rear of the site is taken up by the shaft which greatly restricts the possibility for any foundations or lift pits. Hence the location and design of the circulation core between the existing and extension is considered to be in the rational and optimum position and allows the

habitable wings to be clearly differentiated on either side of the recessed glazed link. This not only allows for clear legibility of the existing and new build hotel room wings but also offers a true and honest architectural representation of its function.

- 5.99 The proposed 120 room hotel will bring a new lease of life to Carlisle House, offering visitors to the capital a unique hospitality experience in an ideally situated location.
- 5.100 As has been demonstrated above, the development has been carefully designed to respect the existing Listed Building and its setting, the buildings within the Conservation Area and its character, and therefore accords with parts a) and b) of Policy CS14 and the Section 12 of the NPPF.
- 5.101 Though the access strategy is described in full within the Design and Access Statement, it is worth noting that the development is designed to provide 10% of rooms as wheelchair accessible, in line with the Development Plan requirements at Policy CS14 and London Plan Policy 4.5.

## Heritage Assets

### Above Ground Built Heritage

- 5.102 The NPPF is the Government's current national guidance regarding development within the historic environment. It is a material consideration that must be taken into account in planning decisions and, in this respect, it includes a clear policy framework for local planning authorities and decision makers.
- 5.103 The following paragraphs from the NPPF are key.
- 5.104 Paragraph 131 requires local planning authorities to take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.105 Paragraph 132 applies specifically to designated heritage assets such as Listed Buildings and Conservation Areas. It states that great weight should be given to the conservation of designated heritage assets and it propagates a proportionate approach (i.e. the more important the asset, the greater the weight attached to its conservation).
- 5.106 Paragraph 133 deals with substantial harm to, or total loss of, significance of a designated heritage asset. Paragraph 134 deals with less than substantial harm and notes that any such harm should be weighed against the public benefits of the proposal. Heritage protection and the conservation of heritage assets are recognised as a public benefit.

5.107 Paragraph 137 deals with the setting of heritage assets and it states that applications that would preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

5.108 Finally, it is worth noting the definition of “conservation” (for heritage policy) in Annex 2 of the Framework:

*“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”*

5.109 The importance and relevance of this definition is that it does not suggest conservation to be the same as preservation. Indeed, what sets conservation apart is the emphasis on proactively maintaining and managing change and not a reactive approach to resisting change.

5.110 London Plan Policy 7.8 (Heritage Assets and Archaeology) sets out the criteria and approach taken by the GLA in assessing planning applications which affect heritage assets. The policy requires development to identify, value and conserve assets where appropriate, and take appropriate steps to conserve the significance of heritage assets. Development affecting heritage assets and their settings, should seek to conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

5.111 The Council seeks to preserve and enhance Camden’s rich and diverse heritage assets and their settings through Policy CS14 and in particular promote high quality landscaping, protect important views and seek the highest standards of access in all buildings and places. This is reiterated by Policy DP24 of the Development Policies document which requires that all developments be of the highest standard of design and consider:

- 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;*
- d) the provision of visually interesting frontages at street level;*
- e) the appropriate location for building services equipment;*
- f) existing natural features, such as topography and trees;*
- g) the provision of appropriate hard and soft landscaping including boundary treatments; h) the provision of appropriate amenity space; and*
- i) accessibility.*

5.112 Camden’s Design Guidance also provides further advice as to how to design developments, including specific heritage matters and the parameters for achieving design excellence.

5.113 To assess the impact of the development in heritage terms, Heritage Collective has prepared a Heritage Assessment. They have also been involved in the design of the building from the outset

and assisted the architect in creating an appropriate scheme for the Site which is sensitive in heritage terms.

5.114 The designated heritage assets specifically assessed within the Heritage Assessment are as below, and the Assessment concludes that impact is at most moderate but mostly negligible across the sites:

- Carlisle House (8-10 Southampton Row) Grade II;
- Kingsway Conservation Area;
- Bloomsbury Conservation Area;
- Baptist Church House Kingsgate House Grade II\*;
- Central St Martins College of Art and Design Grade II\*;
- Avenue Chambers, 6-20 Sicilian Avenue, 1-29 Sicilian Avenue, Numbers 25-35 and 35a and attached screen to Sicilian Avenue and 15-23 Southampton Row Grade II;
- Summit House Grade II;
- 14-17 Red Lion Square Grade II;
- Kingsway Tram Subway (northern section only) Grade II;
- Victoria House Grade II; and
- Bloomsbury Square Gardens Grade II.

5.115 A summary of the proposed works to the Listed Building are set out at Para 3.15 in Section 3 of this Statement and at pages 25 and 26 of the Heritage Assessment. Further, a full assessment of the effects of the development on the significance of the heritage assets is provided at pages 21-23 of the Heritage Assessment, though a summary of the Assessment is below.

### Heritage Assessment

5.116 Carlisle House is a Grade II Listed Building with special architectural and historic interest as an early example of a steel framed, commercial building. Its three principal elevations remain largely intact but internal surveys of the building suggest the integral steel frame requires treatment. Its rear elevation has been heavily compromised by a 1996 conversion to residential which resulted in a new rear sloping roof, and the works associated with building the Cross Rail Shaft to the rear, which has involved the removal of the ground and first floor rear elevation. The remaining rear elevation is altered but retains its original building line and materials. Internally there are very few features surviving, save for the principal staircase running up through the middle of the building and remnants of masonry chimney breasts.

5.117 Within the Kingsway Conservation Area the Listed Building is a positive contributor and has group value with the commercial buildings further south along Kingsway as well as its immediate neighbours, forming a group of Edwardian buildings which survive as they were designed. The Conservation Area is of interest because of this collection of buildings, forming a large scale



Edwardian townscape that replaced a much more intricate pattern of streets. The Kingsway Tram Tunnel (also Grade II) is an important component in that historical development of the area.

- 5.118 Giving attention to the Listed Building and preserving as much of its original fabric as possible the proposed scheme provides for a new use, in keeping with the original use of the building, that will bring the building back into full use and preserve its long term character. The scheme will involve the restoration of the interiors of the building, which have been neglected as a result of the conversion to the Crossrail site office.
- 5.119 To the rear the proposed building is contemporary, with a top, middle and bottom configuration. Both elements are to be linked at the centre of the site by a link block, set in from the streets on either side and stepped down from both buildings. The treatment of the link is to be lightweight to ensure that it does not compete with the elevations of the listed building and there is a strong emphasis on ensuring the transition between the old fabric and the new is legible from within and outside the listed building.
- 5.120 An existing permitted scheme for the site set the development parameters for this proposal and the design team has ensured that the size, bulk and design of the proposed development respects the setting of the Listed Building and the surrounding historic environment. There will be a relatively limited change from the consented scheme to the proposed scheme in relation to views in the area. The additional bulk of the scheme is contained at the rear of the listed building, in the link block, which has been set in from the side streets to ensure a complimentary relationship with the listed building.
- 5.121 Overall the proposed scheme will involve some removal of historic fabric but this fabric is of the least significance and the minimum necessary to ensure a workable building. This will result in less than substantial harm to heritage significance of the Listed Building but this must be considered alongside the benefits to the scheme, both in heritage terms and wider public benefits, in accordance with paragraph 134 of the National Planning Policy Framework.
- 5.122 In terms of heritage benefits (over and above the socio-economic benefits – see Section 7), these are identified as:
- Restoration and repair of principal elevations, (west, north and south);
  - Repair of steel frame (entire building);
  - Restoration and reconfiguration of rear roof form with traditional materials;
  - Reinstatement of features at ground and first floor levels;
  - Providing a new use for the entire building in keeping with its former function;
  - Bringing back into use both entrances off Southampton Row, to serve the reception and restaurant uses;
  - Full refurbishment and overhaul of interiors, retaining key features; and

- Enabling the ground and first floors to be open to the public allowing wider appreciation of heritage significance than at present.

5.123 Overall the design is of a high quality and makes a very restrained site work as a viable hotel proposition, with the ability to restore the building's interiors to a suitable character in keeping with its original function while restoring its fabric, and enlivening its street scene presence through the public use of a hotel with restaurant and bar areas.

5.124 In this context, the development therefore provides an outstanding quality of design which accords with both the Design Guidance, and Policies DP24 and CS14, as well as the NPPF.

## 6 OTHER PLANNING ISSUES

6.1 A number of other material planning issues are considered as part of this planning application. These are detailed as follows:

- Highways & Transportation;
- Energy & Sustainability;
- Ecology;
- Flood Risk;
- Waste & Recycling; and
- Contamination.

6.2 We deal with each of these matters below, summarising the conclusions of the supporting application documents.

### Highways & Transportation

6.3 Policy CS11 seeks to promote sustainable transport and efficient travel within the Borough, promoting walking, cycling and public transport. This aspiration is supported by Policy DP16 which considers the transport implications of development, and states that development will be resisted if it fails to assess and address movements to, from and within the site, additional transport capacity off-site, safe pick up/drop-off and waiting areas for taxis, private cars and coaches where this activity is likely to be associated with the development.

6.4 The London Plan sets out maximum car parking and minimum cycle parking standards at Chapter 6. Paragraph 6A.8 identifies that no maximum car parking standards are set for hotels but that in locations with a PTAL of 4-6 on-site provision should be limited to operational needs, and that required for taxis, coaches and deliveries/servicing. One short stay cycle parking space is required per 20 bedrooms and one long stay cycle space per every 50 bedrooms.

6.5 To justify the proposed development against the above policy requirements, a Transport Statement and Draft Travel Plan (both prepared by RHDV) have been submitted with this planning application.

6.6 To summarise the proposals, no car parking spaces are being provided on site, no taxi bays or coach parking is provided, and cycle parking is provided in accordance with the standards.

6.7 Given that the Site has a PTAL 6b and is highly accessible by public transport, the proposed approach to parking, taxis and coaches is considered justified, and in keeping with the requirements of the London Plan and in order to promote sustainable modes of transport on site.

6.8 The development will provide a total of 16 bicycles which is above the required number of cycle spaces required by the London Plan, also contributing to sustainable transport methods.

- 6.9 During pre-application discussions it was agreed that no designated taxi bays will be provided, and that the hotel is not designed to take large group bookings as it is catered to single business users and the upper end of the tourist market. As such coach bookings are not expected and the applicant is willing to accept a clause in a Section 106 Agreement that would prohibit these types of booking. This approach is supported by the Council's Development Policies document at paragraph 14.5 where it states that "*Where it is not possible to provide for a suitable set down point for coaches, the Council may negotiate planning obligations with developers to prevent coach access to these sites*".
- 6.10 It has been accepted that general servicing to the development cannot take place on site due to the physical constraints of the Site and the requirement to conserve the Listed Building. As such, servicing will take place from Catton Street, immediately adjacent to the back of house/servicing area.
- 6.11 As has been demonstrated within the submitted Transport Statement and Travel Plan, the proposed development is sustainable, highly accessible, and will not cause severe residual impacts. Therefore it is considered that the development is in accordance with the NPPF and the Development Plan, and is acceptable in highway and transportation terms.

### Energy & Sustainability

- 6.12 The London Plan sets out requirements for minimising carbon dioxide emissions at Policy 5.2 and requires that developments follow the "*be lean, be clean, be green*" hierarchy, setting a target of 40% reduction in CO2 emissions between 2013- 2016, with a view to being Zero Carbon between 2016-2031. Policies 5.5 and 5.7 set out the requirements for decentralised energy networks and renewable energy.
- 6.13 Local planning Policies CS13 and DP22 seek to tackle climate change through higher environmental standards and by promoting sustainable design and construction. Policy DP22 requires development to incorporate sustainable design and construction measures and seeks that they are resilient to climate change by ensuring they include appropriate climate change measures.
- 6.14 This is supported by Camden Planning Guidance on Sustainability which provides guidance on BREEAM credits as well as the best way to achieve carbon reductions at developments. The guidance also requires that developments which provide over 500sqm of GIA floorspace submit an Energy Statement.
- 6.15 A Sustainability and Energy Statement (both prepared by Ensphere) have been submitted with this planning application. These confirm that the development's fabric will be constructed to high

performance standards with high levels of thermal insulation and low air permeability, as well as energy efficient lighting throughout the development.

- 6.16 The development will also be compatible with any future district energy network, though connection to a network at this time is not feasible, nor viable.
- 6.17 The development follows the Energy Hierarchy outlined in the London Plan (Policy 5.2) with priority given to efficient design on the basis that it is preferable to reduce carbon emissions by reducing energy demand through low and/or zero carbon technologies.
- 6.18 A range of sustainable design and construction features are proposed including water saving sanitary fittings and appliances, the incorporation of CHP and ASHPs, the use of materials with a low lifecycle, embodied energy and efficient construction, and operational waste management.
- 6.19 It is proposed to assess the scheme against BREEAM and target an 'Excellent' rating, in accordance with the Development Plan.
- 6.20 Overall the proposals are designed to be in accordance with the principles of sustainable development as set out in the NPPF and reinforced by the Development Plan documents.

### Ecology

- 6.21 Policy DP22 sets out the requirements for sustainable design and construction, including BREEAM, which in part requires due consideration of a development's impacts upon ecology. Policy CPG 3 on Sustainability requires that before the design stage, development should consider the quality of existing biodiversity and the potential for enhancement.
- 6.22 An Ecological Impact Assessment (prepared by RHDV) presents ecological information obtained during a desk-study and Extended Phase 1 Habitat Survey which was undertaken between November 2016 and April 2017. The report concludes that given the urban nature of the Site and the current construction works that are ongoing, there is a distinct lack of features present to support any protected species and that there will be no ecological impact during the construction nor operation of the proposed development.
- 6.23 The development will therefore not cause harm to ecology and is considered to be in accordance with Development Plan.

### Flood Risk

- 6.24 The NPPF seeks to ensure that new development is safe and not exposed unnecessarily to the risks associated with flooding. Paragraph 103 seeks that local planning authorities should ensure flood risk is not increased elsewhere.

- 6.25 The London Plan sets out at Policy 5.12 the requirements for Flood Risk Management within the city. The Site is located within Flood Zone 1 meaning that it has the lowest probability of flooding-the River Thames is located almost 1km from the site. The Site is also located outside of any area of increased risk of groundwater flooding. It is located within a Critical Drainage Area, however is not located within a Local Flood Risk Zone.
- 6.26 A Flood Risk Assessment (prepared by RHDV) considers the flood risk associated with the development including the impacts of surface drainage water. It concludes that there are no records of flooding affecting the Site, and that the surface water flood risk is very low. The re-development passes the principles of the Sequential Test and is not required to pass the Exception Test. The document also provides a proposed high level drainage strategy.
- 6.27 Overall, the proposed development is considered acceptable in terms of its location, and is otherwise in accordance with the Development Plan in respect of flood risk.

### Waste & Recycling

- 6.28 The NPPF does not include specific waste policies as these are contained within the National Waste Management Plan for England. Nonetheless, as part of the definition of sustainable development, Paragraph 7 of the NPPF highlights that the planning system should seek to minimise waste through its environmental role.
- 6.29 Core Strategy Policy CS18 sets out that Camden will aim to reduce the amount of waste produced in the Borough and increase recycling and the re-use of materials to meet targets of 40% of household waste recycled by 2010, 45% by 2015 and 50% by 2020. The Policy seeks to make sure that developments include facilities for the storage and collection of waste and recycling. This is supported by emerging Local Plan Policy CC5 which seeks to achieve 60% by 2031.
- 6.30 A Waste Assessment Report has been submitted with this planning application and confirms that during construction inter wastes will be sent to an aggregate recycling facility of which there are a number within London, non-hazardous wastes which are surplus to requirements will be sent off-site in accordance with the waste hierarchy, and the return of packaging and excess material to suppliers during construction would reduce the amount of waste. Residual packaging during construction will be sent off site to recycling centres.
- 6.31 In terms of hazardous waste during construction, proper waste management measures will effectively reduce the amount of hazardous excavation waste on site.
- 6.32 In terms of the waste strategy following completion of the development, a refuse area is provided at ground floor level on the south side of the development and accessible from the back of house area

as well as from Catton Street. The refuse area will be adequate in terms of size for storage of all waste, will be accessible to collectors as well as staff and will contain both non-recyclable and recyclable waste. The waste strategy confirms that waste from the site both during construction and operation will appropriately deal with waste in accordance with the Waste Management Plan for England and also the Development Plan.

### Contamination

- 6.33 The Council does not have any specific planning policy in regards to contamination. Nonetheless, the NPPF requires that contaminated land be remediated where necessary. It should be noted that as part of the Scoping Opinion the Council's Contaminated Land Officer commented that a full ground investigation and generic quantitative risk assessment for the Site is not necessary.
- 6.34 Nonetheless, a Contamination Assessment (Phase 1) has been prepared and submitted with this application. The assessment concludes that a full refurbishment asbestos survey be carried out prior to the commencement of refurbishment works, that limited gas monitoring be carried out on the site specifically in the sub-basement and basement area, and that a piling risk assessment be completed if additional piling works are undertaken.
- 6.35 The Assessment confirms that the Site is suitable for the proposed hotel development.

## 7 PLANNING BENEFITS

7.1 This Section sets out the planning benefits of the proposed development which are material consideration in support of the proposed development and should therefore form part of the planning assessment. The following benefits of the development should be weighed against any perceived harm.

### Heritage Benefits

7.2 A number of heritage benefits exist as a result of the development, as identified below:

- Restoration and repair of principal elevations, (west, north and south);
- Repair of steel frame (entire building);
- Restoration and reconfiguration of rear roof form with traditional materials;
- Reinstatement of features at ground and first floor levels;
- Providing a new use for the entire building in keeping with its former function;
- Bringing back into use both entrances off Southampton Row, to serve the reception and restaurant uses;
- Full refurbishment and overhaul of interiors, retaining key features; and
- Enabling the ground and first floors to be open to the public allowing wider appreciation of heritage significance than at present.

### Economic Benefits

7.3 There are a number of economic benefits to the scheme as detailed below:

- Construction of the development has the potential to create 227 full-time equivalent jobs during the two-year construction period;
- Due to multiplier effect, for every direct job created by the development 0.7 will be created through the supply chain;
- The construction workforce is estimated to be able to contribute £95,700 per annum during the two year construction period expected to be spent within the locality;
- The Proposed Development once complete is estimated to directly support around 85 employees which will lead to direct local expenditure, in addition there will be considerable indirect employment resulting from the development;
- As confirmed from discussions with hotel operators a hotel in the category proposed is aiming to achieve 85% occupancy rate throughout the year – helping to support the local economy and supporting local jobs; and
- The Proposed Development has the potential to generate over £4.5 million pounds in additional expenditure in Camden and the wider area.



## Other Benefits

### Local Employment

- 7.4 As detailed above there are a number of economic benefits that will arise from the development principally arising from both direct and indirect employment leading to increased expenditure within the local area. In terms of the demographic profile of the Borough, 79% of the Borough's population is aged between 16-74, a higher percentage than that of Greater London, showing that the majority of the population is of working age.
- 7.5 The proposed development will provide a range of jobs, some of which will be low entry level, during the construction and operational stages. Evidently, these jobs will be directly accessible to the majority of the local population.

### Planning Obligations

- 7.6 Camden's CPG 8- Planning Obligations sets out the Council's position on all matters relating to planning obligations and CIL. As detailed within Section 5 of this Planning Statement, the applicant is proposing that in order to satisfy the requirements of Policy DP1, a payment in lieu of providing residential use on site will be made. As outlined within the Guidance, the payment in lieu will include a contribution towards affordable housing.
- 7.7 Following the pre-application discussion and with regard to the planning obligations secured for the 2013 permission, the proposed draft heads of terms are set out below:
- A contribution towards off site housing, including affordable housing – in accordance with policy DP1;
  - A contribution towards local employment & training initiatives;
  - A commitment to seek to provide apprenticeships during the construction phase of the development;
  - A commitment to seek to provide employment opportunities once the hotel is operational; and
  - A contribution towards the provision and maintenance of public open space;

### CIL

- 7.8 The Mayoral CIL rate for Camden is £50 per sqm. In terms of Camden's CIL, the site is within 'Zone A', drawing a rate of £40 per sqm for hotel developments.
- 7.9 The appropriate CIL form has been completed by GL Hearn on behalf of the applicant and is submitted with this planning application.

## 8 CONCLUSIONS

- 8.1 This Planning Statement has been prepared in support of an application for full planning permission & Listed Building Consent for hotel development at Carlisle House and 1 Fisher Street.
- 8.2 Specifically, the proposed development includes:
- Conversion and change of use of Carlisle House to a hotel (Class C1 Use) – returning the building to its original and historic use;
  - The ‘over-site development’ of 1 Fisher Street, linking to the new building to Carlisle House – collectively creating a 120 bedroom premium lifestyle hotel;
  - An ancillary bar at ground floor – open to both guests and the public;
  - An ancillary restaurant at first floor – open to both guests and the public;
  - Servicing from Catton Street;
  - 16 cycle parking spaces for guests and staff at basement level 1; and
  - Zero car and coach parking (to be controlled through a Section 106 Agreement).
- 8.3 Carlisle House is a Grade II Listed Building and is within the Kingsway Conservation Area, originally built as a hotel in 1905.
- 8.4 In 1996 Carlisle House was formerly converted to restaurant/pub at basement, ground and first floor with 9 residential units above. In 2009 LUL purchased the Site to accommodate a site office for the adjoining Fisher Street shaft works. As such, the building was only used as residential accommodation for circa 12 years before it was occupied by Crossrail. The building has been occupied by Crossrail for some 8 years now.
- 8.5 Presently the basement – fourth floors of Carlisle House are in use by Crossrail as their construction site offices (including shower/locker, welfare, storage, training facilities) with the upper floors being unoccupied (5<sup>th</sup> - 7<sup>th</sup>). The upper floors have been gutted, and to varying extents altered to accommodate structural supports for the building’s turrets which are being repaired. These floors are in continuous use by Crossrail for the purposes of maintenance and repair.
- 8.6 To facilitate Crossrail’s occupation of the building and to gain access to the adjoining Fisher Street shaft a substantial amount of demolition to the rear of the building has taken place. Notably the works undertaken by Crossrail have included the removal of the external primary means of access to the upper floors of Carlisle House and the former residential units are no longer ‘existing’, accessible or habitable.
- 8.7 In 2013 Crossrail was granted planning permission (2013/1477/P) for the over site development at 1 Fisher Street to create 22 residential units. An offsite payment was made to include affordable

housing as it was determined that the physical constraints of the site prevented on site provision (i.e. a mixed use scheme was not practical and deliverable on site).

- 8.8 It is an important consideration that Crossrail marketed the Site with the benefit of planning permission but a purchaser/developer was not found. The residential permission is considered to undeliverable due to the modest scale of the scheme, the site constraints and the inherent complexity of the construction process increasing build costs, balanced against a falling housing market. In essence, the housing scheme is an unattractive proposition to house builders and developers.
- 8.9 In 2016, Crossrail was granted a Certificate of Proposed Lawful Use (Ref: 2016/2985/P) to enable the resumption of the former residential use of the upper floors of Carlisle House once Crossrail has vacated.
- 8.10 Notably the application was for a *proposed* use, not an *existing* use. Further, the application did not consider whether practically the building could revert to residential use, and nor did it take account of the requirement for planning permission and Listed Building Consent to be secured to grant permission for the relevant works to be undertaken. Finally the application did not consider the commercial viability of undertaking the substantial restoration works to revert back to the former uses all of which are addressed by this proposal.
- 8.11 Given the above, and Crossrail's requirement to deliver best value when disposing of its sites, the applicant was selected to deliver a suitable and viable use for the Site i.e. a hotel.
- 8.12 Section 38(6) of the PCPA (2004) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. This planning statement, along with the supporting documents, conclude that the proposed development accords with the Development Plan and that there are a number of material considerations of weight that indicate the proposals constitute sustainable development, as defined by the NPPF. As such, the applications should be approved without delay.
- 8.13 In summary, our reasons for this conclusion are:
- The Site is located within the CAZ, the Central London Area, and the Holborn Growth Area. The Sited benefits from a PTAL rating of 6b and is highly accessible and sustainable. Planning policy specifically directs hotel development to such locations, and such a use is therefore acceptable in principle;
  - This statement has demonstrated how the requirements of Policy DP14 are met in full, therefore establishing that a hotel at the Site is an appropriate land use;

- The Development Plan and the NPPF provide support in principle for the sensitive conversion of the Listed Building where such works will bring a heritage asset back to a viable use, protecting it for future generations;
- Carlisle House was originally built as a hotel and the proposed development has the heritage benefit of returning the building back to its intended use;
- Carlisle House was formerly in use as residential and a restaurant/pub, but this use ceased in 2009 when Crossrail occupied the building. With regard to Policy DP2, the Site cannot be said to comprise 'existing' residential floor space because:
  - layout of the flats at second, third and fourth floors has been entirely removed and cannot be said to exist;
  - the former units at the upper floors have been gutted and are not habitable, therefore are not considered existing floorspace;
  - the means of access to the upper floors has been removed as part of the works undertaken by Crossrail. As such the former flats could not be occupied without the reinstatement of the access, as well as significant works to the internal fabric of the building;
  - Accessing the flats using a shared core with the A4 use at ground and first floor would be contrary to Building Regulations;
  - To reinstate the former use of the building Listed Building Consent and in part, planning permission, would be required;
  - As demonstrated by the Viability Assessment supporting the planning application, the reinstatement of the building to provide 9 residential units and the A4 unit is not financially viable; and
  - There is no requirement to reinstate Carlisle House to its former use under the Crossrail Act.
- With regard to the Policy DP1, this statement and supporting documents demonstrates that it is not practical, commercially or financially viable to deliver a mixed use development on this Site. A single use hotel is appropriate in land use terms, having regard to the commercial area within which the Site is located, and the policy framework which specifically directs hotels to such locations. Indeed it is considered that the Site is more appropriate for a hotel use than residential;
- A hotel development is will enable Crossrail to establish best value for the Site when it disposes of it;
- An offsite payment in lieu of housing on site provision is proposed. This will include a contribution towards affordable housing;
- There are a number of significant heritage benefits arising for the development including the restoration and repair of principal elevations; the repair of steel frame (entire building); the

reinstatement of features at ground and first floor levels; and enabling the ground and first floors to be open to the public allowing wider appreciation of heritage significance than at present.

- Overall the design is of a high quality and makes a very restrained site work as a viable hotel proposition, with the ability to restore the building's interiors to a suitable character in keeping with its original function while restoring its fabric, and enlivening its street scene presence through the public use of a hotel with restaurant and bar areas;
- Other planning benefits also result from the development including that some 277 FTE jobs are to be supported during construction, with a further 85 employees supported once operational. The type of jobs to be provided will include those with a low entry level and therefore accessible to a wide range of people in the Borough. These jobs will lead significant direct local expenditure. Once operational, guests to the hotel are expected to generate some £4.5m expenditure locally per annum.