



Planning & Development Ltd

# **JMS Planning & Development**

## **Planning, Design, Access and Heritage Statement**

### **In Support of Proposals for Demolition and Rebuilding of Rear Extensions**

**At**

**Hotel Montana  
16-18 Argyle Square  
London, WC1H 8AS**

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## **SECTION 1: INTRODUCTION**

- 1.1 This Planning, Design, Access and Heritage Statement has been prepared on behalf of St Pancras Hotel Group in support of a retrospective application for full planning permission and an associated retrospective application for Listed Building Consent for the demolition and rebuilding of rear extensions at the Hotel Montana at 16-18 Argyle Square, London, WC1H 8AS.
- 1.2 The application site comprises the existing Hotel Montana (use class C1) which is located at 16-18 Argyle Square and forms part of a terrace of Grade II listed buildings. The application site benefits from full planning permission and Listed Building Consent for comprehensive refurbishment of the hotel. Specifically, full planning permission (LPA Ref: 2016/0153/P dated 30 November 2016) has been granted for *“Reinstatement of front balconies, replacement windows at front and rear, reinstate external window mouldings, replacement front doors, staircase to front lightwell, sedum roof to ground floor rear projecting wings; re-alignment of windows at rear lower ground floor and replace with aluminium double glazed windows, all to existing hotel”*. The associated Listed Building Consent (LPA Ref: 2016/0495/L) for the same description of development is also dated 30 November 2016. Works for the refurbishment of the hotel are currently underway. The above extant permissions in respect of the rear extensions included the refurbishment of the three rear extensions along with various remodelling work.
- 1.3 However, whilst construction works were underway, during the strip out phase of the rear extensions, significant structural issues became apparent which included:
- Foundations insufficiently sized, between 450-600mm deep;
  - Roof timbers insufficiently sized;

- Floor timbers insufficiently sized;
- Failure of the damp proof course leading to extensive rising damp;
- Structural movement and cracking to various walls;
- Issues with damp and mould growth due to cavity wall insulation being insufficient and in many areas missing;
- Damp to roof timbers due to significant water ingress to all three rear extension roofs.

1.4 Following a costing to address these works, it was apparent that it was more economic to demolish and rebuild the structures given that the works required to remedy the above defects effectively required very extensive rebuilding in any event. The rear extensions have been the subject to previous investigation by the Council's Conservation Officer and it has been agreed that the rear extensions are of no specific heritage merit. It is acknowledged that these works require retrospective planning permission and Listed Building Consent. Following discussions with Angela Ryan, Planning Enforcement Officer, at LB Camden, with associated correspondence dated 25 September 2017; a formal retrospective planning application and application for Listed Building Consent is now submitted.

1.5 The finalised refurbishment scheme for the application site will, once complete, provide enhanced visitor accommodation within London, improving LB Camden's hotel stock in a location in close proximity to King's Cross Station and St Pancras International Station. Overall, it is therefore considered that the application provides enhanced tourist infrastructure for London and heritage benefits both to the existing building and to the Bloomsbury Conservation Area.

1.6 This Statement sets out a background to the application, a description of the site, its planning history and an overview of relevant planning policy before providing details of the design proposals, the site's accessibility, an assessment of the assets

of heritage significance and an assessment of the impact of application proposals upon these assets. However, the application is effectively a *'like-for-like'* rebuilding of the existing three rear extensions. This Planning, Design, Access and Heritage Statement should therefore be considered along with the accompanying forms and drawings submitted with the application and is submitted to justify and support the application proposal in the context of national and local heritage and development planning policy.

1.7 Accordingly, this document has the following structure:

- A description of the application site (Section 2);
- A review of the site's planning history (Section 3);
- An overview of the development proposals (Section 4);
- An overview of relevant national and local planning policy (Section 5);
- An assessment of the relevant general planning issues (Section 6)
- Detailed overview of the design proposals (Section 7);
- An overview of accessibility issues (Section 8);
- An assessment of the heritage implications of the proposal (Section 9);
- Sustainability (Section 10);
- Conclusions (Section 11).

## SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site has an authorised use as a hotel (use class C1) operating as 'The Hotel Montana'. Prior to its closure for refurbishment the hotel was tired and provided basic accommodation for budget conscious travellers. The hotel had 46 bedrooms. It is now proposed to refurbish the hotel in accordance with the current extant permissions to provide enhancements to the listed building particularly in respect to its frontage to Argyle Square which in turn will provide benefits both to the Bloomsbury Conservation Area and to the general environment of Argyle Square.
- 2.2 Numbers 16-18 Argyle Square are located on the east side of Argyle Square which is located south of Euston Road (A501) some 200m south of King's Cross Station within the Bloomsbury Conservation Area and the London Borough Camden.
- 2.3 The property itself forms part of a consecutive terrace of Grade 2 Listed houses dating from 1840 to 1849. The properties are uniform in height being five storeys (including basement level) with yellow stock brick facades and sash windows some of the properties have render at ground floor level.
- 2.4 The Listing of the property on the Historic List is as follows:

*"TQ3082NW ARGYLE SQUARE 798-1/90/47 (East side) 14/05/74 Nos. 7-25 (consecutive) and attached railings (Formerly listed as: ARGYLE SQUARE Nos. 7-25, 26-35, 36-47 (consecutive)*

*GVII*

*Terrace of 19 houses, now mostly small hotels, forming the east side of Argyle Square. 1840-49, altered. Yellow stock brick, Nos 7, 9, 10 and 16-18 painted.*

*Rusticated stucco ground floors, Nos 7, 9, 10, and 16-18. Painted ground floors, Nos 6, 11, 12, 14, 15 and 19-25. 4 storeys and basements. 2 windows each. Architraved, round-arched ground floor openings. Doorways, where unaltered, with pilaster-jambs carrying cornice-heads; patterned fanlights and panelled doors. Entrance to No. 7 in single storey stucco extension on left hand return. Nos 7 and 25, square-headed ground floor windows. Gauged brick flat arches to assortment of recessed casements and sashes on upper floors; 1st floors with architraves and cast-iron balconies. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with bud finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 105)."*

- 2.5 The terrace was originally listed on 14 May 1974. The application site has railings at front, but notably is missing a number of ornate exterior balconies and balustrades at first floor level (which are referred within the listing description above) and now contains many non-conforming windows. As a result the façade of the application site is at odds with other properties in the terrace. The replacement and reinstatement of the missing front balconies forms part of the existing planning permission and Listed Building Consent for the site.
- 2.6 Argyle Square was developed in the 1830s/1840s although some of the streets immediately surrounding it are likely to have been built slightly earlier. Argyle Square reflects a formal early 19th century street pattern and layout of open spaces. Four storey town houses surround the Square which have a restrained classical appearance with consistent parapet lines, decorative stucco banding, large first floor windows with stucco surrounds, arched ground floor doors and a parapet concealing the roof. The central garden of Argyle Square itself is green with mature trees which provide a welcome landscape contribution to the character and appearance of the Bloomsbury Conservation Area.

### **SECTION 3: PLANNING HISTORY**

- 3.1 The application site benefits from a current planning permission and Listed Building Consent for comprehensive refurbishment of the existing hotel. Specifically, full planning permission (LPA Ref: 2016/0153/P dated 30 November 2016) has been granted for *“Reinstatement of front balconies, replacement windows at front and rear, reinstate external window mouldings, replacement front doors, staircase to front lightwell, sedum roof to ground floor rear projecting wings; re-alignment of windows at rear lower ground floor and replace with aluminium double glazed windows, all to existing hotel”*. The associated Listed Building Consent (LPA Ref: 2016/0495/L) for the same description of development is also dated 30 November 2016.
- 3.2 Historically, a planning application for the erection of a part first floor, rear addition together with the insertion of a high level window at ground floor level (LPA Ref: L14/30/F/HB2685) was granted Listed Building Consent dated 17 August 1981. An associated full planning application (LPA Ref: L14/30/F/32489) was also granted planning permission on 17 August 1981.
- 3.3 Planning permission (LPA Ref: 8900548) for the erection of a first floor rear extension to the hotel was registered on 1 November 1989 and subsequently granted planning permission on 17 July 1990. The associated application for Listed Building Consent was granted on the same date.
- 3.4 Finally, a Certificate of Lawfulness (LPA Ref: 9T00507) confirming the use of the site as a hotel was issued dated 16 July 1991.
- 3.5 There is no other planning history of relevance on the site.



## **SECTION 4: THE PROPOSAL**

4.1 The application proposal is simply to rebuild the three rear extensions as per the extant planning permission 2016/0153/P and the extant Listed Building Consent 2016/0495/L. Effectively, the application proposal is for a *'like-for-like'* development. The height of the rear extensions is to be the same and will include; three bedrooms at lower ground floor with two external courtyards and one internal courtyard with three bedrooms at ground floor and three bedrooms at the proposed halfway floor. This is all as per the approved plans of the extant planning permission and Listed Building Consent. As explained at the outset, the reason for the demolition of the existing rear outbuildings and their rebuilding is simply because during the works a number of deficiencies with the rear extensions were discovered. These included:

- Foundations insufficiently sized, between 450-600mm deep;
- Roof timbers insufficiently sized;
- Floor timbers insufficiently sized;
- Failure of the damp proof course leading to extensive rising damp;
- Structural movement and cracking to various walls;
- Issues with damp and mould growth due to cavity wall insulation being insufficient and in many areas missing;
- Damp to roof timbers due to significant water ingress to all three rear extension roofs.

4.2 The above issues were so significant and extensive that the decision was made to demolish and rebuild as the only practical way forwards.

- 4.3 The previous rear extensions, now demolished, have been extensively reviewed by the Council's Conservation Officer. It was acknowledged that none of the rear extensions were of any heritage value. The application proposal seeks retrospective planning permission and Listed Building Consent for the demolition and rebuilding of the three rear extensions to the existing Montana Hotel.
- 4.4 Further details of the detailed design proposals are set out later within this statement.

## SECTION 5: RELEVANT PLANNING POLICY

5.1 This section of the supporting statement sets out relevant national and local planning policy relevant to the proposed planning application.

### **National Planning Guidance**

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

5.2 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and now constitutes guidance for local planning authorities and decision takers.

5.3 The ministerial foreword by Greg Clark confirms that *“The purpose of planning is to help achieve sustainable development”* and that *“development that is sustainable should go ahead, without delay—a presumption in favour of sustainable development that is the basis for every plan, and every decision”*. In addition, the ministerial foreword confirms that *“in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives”*.

5.4 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).

5.5 Paragraph 7 confirms 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 – contribute 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;
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, using natural resources prudently, and minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

5.6 Paragraph 8 confirms that these roles should not be undertaken in isolation because they are mutually dependant. In order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. It is confirmed the planning system should play an active role in guiding development to sustainable solutions.

5.7 The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications (paragraph 13).

5.8 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking, this means:

- Approving development proposals that accord with the Development Plan without delay, and;

- Where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless:
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
  - *Specific policies in the Framework indicate development should be restricted (paragraph 14).*

5.9 Paragraph 17 confirms that, within the overarching roles the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These principles include:

- Not simply be about scrutiny but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places the country needs.
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- Promote mixed use developments, and encourage multiple benefits from the use of land of urban and rural areas;

- Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 5.10 The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future (paragraph 18).
- 5.11 The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system (paragraph 19).
- 5.12 To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (paragraph 20).
- 5.13 Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policy should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing (paragraph 21).
- 5.14 Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up local plans, local planning authorities should, inter alia:
- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.

- Promote competitive town centres that provide customer choice and a diverse retail offer which reflects the individuality of town centres.
- Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity (paragraph 23).

5.15 Paragraph 35 of the NPPF states that plans should protect and exploit opportunities for the use of sustainable transport nodes for the movement of goods or people. Therefore, development should be located and designed where practical to:

- Accommodate the efficient delivery of goods and supplies;
- Give priority to pedestrian and cycle movements, with access to high quality public transport facilities;
- Create safe and secure layouts which minimise conflict between traffic and cyclists or pedestrians, avoiding street clutter.

5.16 The Government attaches great importance to the design of the built environment. Good design is a key aspect to sustainable development; it is indivisible from good planning and should contribute positively to making places better for people (paragraph 56). It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Paragraph 57).

5.17 Planning policies and decisions should not attempt to impose architectural styles, or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms

or styles. It is, however, proper to seek to promote or reinforce local distinctiveness (Paragraph 60). Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations (Paragraph 61).

5.18 In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area (Paragraph 63).

5.19 Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions (Paragraphs 64).

5.20 Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits) (Paragraph 65).

5.21 Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In developing this strategy, the local planning authority should take into account:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The wider social, cultural and economic and environmental benefits that conservation of the historic environment can bring;



- The desirability of new development making a positive contribution to local character and distinctiveness (paragraph 126).
- 5.22 Paragraph 128 confirms that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 5.23 Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of the heritage asset), taking into account the available evidence and any necessary expertise (paragraph 129). In determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities, including the economic vitality;
  - The desirability of new development making a positive contribution to local character and distinctiveness (paragraph 131).
- 5.24 Paragraph 132 confirms that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and

convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of a higher significance should be wholly exceptional.

5.25 Where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply;

- The nature of the heritage asset prevents all reasonable uses of the site and;
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that would enable its conservation and;
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible and;
- The harm or loss is outweighed by the benefit of bringing the site back into use (paragraph 133).

5.26 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).

5.27 Local planning authorities should not permit loss of the whole or part of the heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred (paragraph 136).

- 5.28 Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the benefits of departing from those policies (paragraph 140).

#### National Planning Practice Guidance (2014)

- 5.28 The National Planning Practice Guidance (NPPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. The NPPG is accompanied by a Ministerial Statement setting out which Planning Practice Guidance documents are cancelled as a result of the NPPG.

#### **The Development Plan**

- 5.29 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the statutory development plan, unless other material considerations indicate otherwise.
- 5.30 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 the statutory development plan comprises The London Plan (Consolidated with Alterations Since 2011) (March 2016), and the Camden Local Plan (adopted 3 July 2017).

#### The London Plan (Consolidated With Alterations since 2011) (March 2016)

- 5.31 Policy 1.1 (Delivering the Strategic Vision and Objectives for London) confirms growth will be supported and managed across all parts of London to ensure it takes place in the current boundaries of London without either encroaching on the Green Belt, London's protected open spaces or having unexpected impacts on the environment.

- 5.32 Policy 2.9 (Inner London) states that the Mayor will, and boroughs and other stakeholders should, work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.
- 5.33 Policy 2.10 (Central Activity Zone – Strategic Priorities) confirms that the Boroughs should enhance and promote the unique, international, and London-wide role of the Central Activity Zone (CAZ).
- 5.34 Policy 4.5 (London Visitor Infrastructure) confirms that the Mayor will, and Boroughs and relevant stakeholders should support London's visitor economy and stimulate its growth taking into account the needs of business as well as leisure visitors and seek to improve the range and quality of provision, especially in Outer London.
- 5.35 Policy 7.8 (Heritage Assets And Archaeology) confirms, inter alia, that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural details.

The Camden Local Plan (July 2017)

- 5.36 Policy E3 (Tourism) confirms the Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. It confirms the Council will expect new large-scale tourism

development and visitor accommodation to be located in Central London, particularly in the growth areas of, inter alia, Kings Cross.

- 5.37 Policy CA1 (Managing Impact and Development) confirms that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity.
- 5.38 Policy A4 (Noise and Vibration) confirms the Council will seek to ensure that noise and vibration is controlled and managed.
- 5.39 Policy D1 (Design) confirms the Council will seek to secure high quality design and development. In particular, the Council will require development that, respects local context and character and preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage). It requires development to be sustainable in design and construction and to comprise details of materials that are of high quality and complement the local character and integrity well with the surrounding streets and open spaces.
- 5.40 Policy D2 (Heritage) states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including Conservation Areas and Listed Buildings. The policy confirms the Council will not permit the loss or substantial harm to a designated heritage asset, including Conservation Areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or all of the following apply:

- a. The nature of the heritage asset prevents all reasonable uses of the site;

- b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. Conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
- d. The harm or loss is outweighed by the benefit of bringing the site back into use.

5.41 The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits to the proposal convincingly outweigh that harm.

5.42 In respect of Conservation Areas, the Council will:

- e. Require that development within Conservation Areas preserves or, where possible, enhances the character or appearance of the area;
- f. Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a Conservation Area;
- g. Resist development outside of a Conservation Area that causes harm to the character or appearance of that Conservation Area; and
- h. Preserves trees and garden spaces which contribute to the character and appearance of a Conservation Area or which provide a setting for Camden's architectural heritage.

5.43 In the context of Listed Buildings, the Council will:

- i. Resist the total or substantial demolition of a Listed Building;
- j. Resist proposals for a change of use or alterations and extensions to a Listed Building where this would cause harm to the special architectural and historic interest of the building; and

- k. Resist development that would cause harm to significance of a Listed Building through an effect on its setting.

5.44 Policy CC1 (Climate Change Mitigation) confirms the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Camden Planning Guidance 1 – Design (2015)

5.45 Para 3.20 highlights that works to listed buildings are assessed on a case by case basis, taking into account the individual features of a building, its historic significance and the cumulative impact of small alterations. Para 3.22 confirms that the Council has a statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Council will consider the impact of proposals on the historic significance of the building, including its features, such as original and historic materials and architectural features, original layout of rooms, structural integrity and character and appearance.

5.46 Para 3.23 confirms the Council's expectation that original or historic features are retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly changing them.

5.47 Para 3.26 notes that some works that are required in order to comply with the Building Regulations may have an impact on the historic significance of a listed building and will require listed building consent.

5.48 Para 3.29 recognises the role that the historic environment can play in reducing the impact of climate change. For example, reusing existing buildings could avoid

the material and energy cost of new development. The Council seeks a balance between achieving higher environmental standards with protecting Camden's unique built environment.

Camden Planning Guidance 4 – Basements and Lightwells (2015)

5.49 Section 2 of this guidance states that the Council will only permit basement and underground development that does not:

- cause harm to the built and natural environment and local amenity;
- result in flooding; or
- lead to ground instability.

5.50 The guidance states that a Basement Impact Assessment will be required in some instances to enable the Council to assess whether any predicted damage to neighbouring properties and the water environment is acceptable or can be satisfactorily ameliorated by the developer.



## **SECTION 6: GENERAL PLANNING ISSUES**

6.1 This section of the supporting statement deals with the general planning issues associated with the application proposal.

6.2 Having considered the nature of the application and the relevant planning policy background, it is considered the following issues are most relevant to the application proposal. Namely:

- Does the application represent sustainable development?
- Residential amenity;
- Tourism benefits;
- Basement impact.

6.3 Each of the above issues is now considered in turn below.

### **Does The Application Represent Sustainable Development?**

6.4 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and now constitutes guidance for local planning authorities and decision takers.

6.5 The ministerial foreword by Greg Clark confirms that *“The purpose of planning is to help achieve sustainable development”* and that *“development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision”*. In addition, the ministerial foreword confirms that *“in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives”*.

- 6.6 It is confirmed the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).
- 6.7 Paragraph 8 confirms that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. It is confirmed the planning system should play an active role in guiding development to sustainable solutions. It is confirmed that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 6.8 The application site comprises previously developed land and is therefore a brownfield site. As such, the development of the application site represents sustainable development by virtue of the recycling of previously developed land.
- 6.9 The application proposal seeks the redevelopment of the former rear extensions in a *'like-for-like'* manner. As such, the application will help promote the most efficient use of land and buildings in Camden by, inter alia, seeking development that makes full use of its site. The application proposal makes full use of the application site.
- 6.10 The wider refurbishment scheme for the hotel provides for significant heritage benefits to both the application site itself and the Bloomsbury Conservation Area. These are discussed later within this Statement. As such, the application also provides for an environmental role contributing to protecting and enhancing the built and historic environment. The application also provides for enhanced visitor accommodation in London as well as further investment in London's visitor Infrastructure as well as ensuring ongoing requirements for jobs on the site. As such, the application also contributes to building a strong, responsive and competitive economy and provides a social role by providing a supply of visitor accommodation to guests to London.

6.11 As such, it is considered that the application addresses the three dimensions to sustainable development, economic, social and environmental as set out in paragraph 7 of the NPPF. The application achieves economic, social and environmental gains and should therefore be recognised as sustainable development.

6.12 On the basis that the application site represents sustainable development, there is as set out above a presumption in favour of the grant of planning permission. This weighs heavily in favour of the proposal.

### **Residential Amenity**

6.13 The properties on either side of the application site are also hotels (as are the majority of the properties on Argyle Square). As such, there are no immediate residential neighbours either side. However, the rear of the application site does adjoin an existing housing estate.

6.14 The rear extensions have already been demolished, as such, rebuilding is now required. For the reasons set out above, this is not considered to give rise to any residential amenity concerns. The redevelopment/refurbishment of the rear extensions is in a form already permitted through the previous planning permission 2016/0153/P and associated Listed Building Consent 2016/0495/L. In this respect, it is not considered that the rebuilding of the rear extensions gives any rise to concerns over residential amenity. This issue has been fully considered in the context of the previous application.

6.15 Notably, no change of use of the application site is proposed. As such, the use of the site will remain as a hotel (use class C1). Furthermore, overall the number of

hotel rooms is being reduced from 46 to 33, a reduction of 13 rooms (28%). As such, the intensity of the use is being decreased.

- 6.16 Furthermore no new plant is proposed as part of the planning application.
- 6.17 New external terraces are proposed at the rear of the application site at first floor level; these are protected from overlooking the adjacent Riverside Housing Estate by privacy screens and associated planting as per the extant permission. These as shown on the associated planning drawings as circa 2m high and will be sufficient to prevent any overlooking. Similarly the application site, when viewed from the adjacent Riverside Housing Estate remains generally unchanged in appearance although more traditional looking windows are proposed to replace the existing poor quality existing windows. Notably no additional windows are being proposed on this elevation.

#### **Tourism Benefits**

- 6.18 The application supports the redevelopment of the Montana Hotel situated in Kings Cross. The application site has an authorised use as a hotel and has planning permission for refurbishment of the existing hotel to provide enhanced visitor accommodation in Camden in an appropriate location (Kings Cross) in accordance with the relevant policy. Accordingly, the application is considered to accord with Policy E3 (Tourism) of the recently adopted Camden Local Plan (July 2017).
- 6.19 The rebuilding of the rear extensions does not involve any new excavation works.

#### **Basement Impact**

- 6.20 The conversion and refurbishment of the lower ground, rear storage areas, is proposed but these are not to be meaningfully lowered. In addition, the current

external courtyard is to be levelled and developed but again, this does not involve any subterranean works. The ground in the external courtyard is made ground in any event.

- 6.21 Accordingly, there is no need for any form of basement impact assessment, and as such the submission of a formal Basement Impact Assessment is not considered to be required.

## **SECTION 7: DESIGN PROPOSALS**

- 7.1 This section of the supporting Statement reviews the design proposals submitted and assesses their appropriateness in terms of the proposed use, scale and layout, appearance and landscaping. An assessment of the heritage implications of the application proposals is contained later within this Statement.

### **Use**

- 7.2 The use of the site and the rear extensions is proposed to remain unchanged. Accordingly, no change of use of the site is proposed. The site will remain a hotel (Use Class C1) use.

### **Scale and Layout**

- 7.3 The proposed rear extensions are to be built in accordance as per the previous rear extensions on site, ie they are to be rebuilt in the same locations and of the same scale. The internal arrangement of the rear extensions is as per the existing approved plans under extant planning permission 2016/0153/P and extant Listed Building Consent 2016/0495/L. The proposed size and layout of the rear extensions have already been considered acceptable in the context of the extant permission and Listed Building Consent on the site.

### **Appearance**

The proposed rear extensions are to be rebuilt as per the approved scheme in respect to the extant planning permission and Listed Building Consent. As such, the appearance of the rear extensions should not give rise to any adverse considerations given it is simply a rebuilding of the previous, poor quality, existing structure. The rear extensions are a fundamental element of the overall

refurbishment scheme for the Montana Hotel. This scheme is acknowledged to provide some welcome benefits to the Conservation Area in which it is sited and Argyle Square itself.

7.4 In particular, the overall appearance of the site is to be enhanced particularly from the key vista from Argyle Square. This is a result of various works to the front elevation of the building which will provide heritage benefits and will enhance the appearance of the building. These proposals include:

- The front railings are to be refurbished and painted black;
- The introduction of white painted hardwood 3-over-3 traditionally detailed clear single glazed, sliding sash windows and external window reveal as replacements for the existing poor quality windows;
- Reinstated white painted rendered concrete balcony and black painted decorative mild steel railings to match existing adjacent.
- New black painted hardwood six panel moulded solid traditionally detailed double doors with bronze ironmongery and clear single glazed arched fanlight.
- New black painted, mild steel, arch with illuminated lantern centred to top of arch to denote entrance steps from street.

7.5 In summary, these changes to the building result in heritage benefits but also, result in significant visual enhancements to the existing building.

## **Landscaping**

- 7.6 The application has no specific impact on landscaping. Again, the proposed application is entirely in accordance with the existing extant permission and Listed Building Consent already granted on the site.
- 7.7 There is no landscaping which exists on site at the present time. The whole site being fully developed.
- 7.8 There is therefore no opportunity to provide any landscaping at the front of the site other than through potted plants but new sedum roofs are proposed on the roof of the rear outriggers. As such, the application proposal provides an enhancement of the landscaping on the site of the present time.
- 7.9 The overall scheme for redevelopment of the site will thus provide landscape benefits over and above that which exists on site at present. This is a material consideration in favour of a grant of planning permission.

## **Secured By Design**

- 7.10 It remains the case that the issue of Secured by Design (SBD) has been taken into consideration in the formulation of this development proposal. Accordingly, all doors and windows will wherever possible, comply by Secured by Design accredited products. Door locks and standards will be to the appropriate requirements in conjunction with the requirements of English Heritage conservation principles. Window standards specification will incorporate enhanced security performance of casements. The applicant confirms it is happy to agree to an appropriate SBD condition as required.



## **Summary**

- 7.11 This section of the Planning, Design, Access and Heritage Statement sets out an overview of the application proposal in terms of the key design criteria of use, scale and layout, appearance and landscaping. The issue of accessibility is considered in the following section. In respect to the issue of use, no change in the use is proposed, no significant increase in the scale and layout of the site is proposed and the overall development scheme results in visual enhancements to the existing building (with consequent benefits to the Bloomsbury Conservation Area) and provides enhanced landscaping on the site. As such, it is considered that the application results in positive design benefits.

## **SECTION 8: ACCESSIBILITY**

- 8.1 This section of the supporting Statement sets out details of the site’s accessibility, how access to the site has been arranged and what considerations have been incorporated to the scheme in respect to the issue of inclusive access.
- 8.2 The applicant is committed to a policy of equality, inclusion and accessibility for those who visit and work at the site and has strived to exceed all required standards and achieve a development which promotes inclusion and accessibility for all staff and customers within the constraints imposed by the listed status of the application site.
- 8.3 The provision of an accessible and inclusive environment has been an integral theme throughout the design process, from its initial conception to its evolution through to the planning application process. The concept of inclusive design seeks to remove barriers which create undue effort, separation or special treatment which enables everyone to participate equally regardless of gender, disability or age. In particular, consideration has been taken of the Council's relevant policies relating to access matters.

### Access to the Site

- 8.4 The site is located within the defined Highly Accessible Area within the Camden Core Strategy and has a PTAL rating of 6(b) (excellent). The site is located some five minutes’ walk south of the King’s Cross Mainline Underground Station. Nearby public car parking is available at the Judd Street (35 spaces) and Britannia Street. There are a number of other public car parks in the immediate area. It is anticipated though that the majority of visitors to the hotel will make their journey there by foot. Pavements surrounding Argyle Square are wide and provide ease of movement for both pedestrians and the ambulant disabled and wheelchair users.

- 8.5 The site has been a hotel use for a considerable period of time. Access to the site by visitors has never proved problematic (most visitors are either dropped off by taxi or walk from Kings Cross/St Pancras Stations etc). Equally, Argyle Square is principally occupied by hotels and as such, the appropriateness of the location for hotel use is both well-established and clearly demonstrable.

#### Inclusive Access

- 8.6 Whilst the applicant has sought to fully incorporate inclusive access, wherever possible this has simply not been feasible, particularly in terms of access for wheelchair users as a result of the listed building status of the property. It is not possible to have a lift or within the hotel or at the front of the property. The applicant has therefore sought to provide a scheme as accessible as possible within the constraints of the listed nature of the building.
- 8.7 In reality, in the case of this listed building, this is a management issue and any visitors to the site who are mobility impaired, or in any way disabled will receive staff assistance to assist their use of the premises.

#### Legibility

- 8.8 The existing proposed signage on the building will clearly indicate the hotel use. The point of entry to the premises will be clearly visible from the street and there will appropriate signage within the hotel to assist legibility including in respect of fire safety requirements and emergency access.

#### **Summary**

- 8.9 This section of the Statement sets out details of the site's accessibility. It has been shown that the site is highly accessible and that full consideration of relevant

access and inclusive access criteria has been taken in accordance with adopted policy no onsite car parking is provided. It is therefore considered that the application is acceptable in this respect.

## **SECTION 9: HERITAGE ASSESSMENT**

9.1 In accordance with the requirements of the NPPF this heritage statement describes the significance of the heritage assets affected by the development proposal.

9.2 The purpose of this statement is to assist with the determination of the application by informing the decision takers on the effects of the development on the historic built environment. Value judgements on the significance of the heritage assets presented and the effects of the proposals upon that significance are appraised. This statement also sets out how the proposals comply with the guidance and policy of the NPPF and the local policy framework. Specifically, this assessment assesses the significance of the relevant designated heritage assets and the effects of the development upon them. Each of these matters is now considered in turn below.

### **The Significance of the Relevant Heritage Assets**

9.3 There are two specific heritage assets which need to be considered in this heritage assessment. Firstly, the application site itself is a listed building and secondly it is located within the Bloomsbury Conservation Area.

9.4 The significance of each of these assets is now considered in turn below:

#### 16-18 Argyle Square (Application Site)

9.5 The Montana Hotel comprises three former town houses on the eastern side of Argyle Square. The property itself forms part of a consecutive terrace of Grade 2 Listed houses dating from 1840 to 1849. The properties are uniform in height

being five storeys (including basement level) with yellow stock brick facades and sash windows some of the properties have render at ground floor level.

9.6 The Listing of the property on the Historic List is as follows:

*"TQ3082NW ARGYLE SQUARE 798-1/90/47 (East side) 14/05/74 Nos. 7-25 (consecutive) and attached railings (Formerly listed as: ARGYLE SQUARE Nos. 7-25, 26-35, 36-47 (consecutive)*

*GVII*

*Terrace of 19 houses, now mostly small hotels, forming the east side of Argyle Square. 1840-49, altered. Yellow stock brick, Nos 7, 9, 10 and 16-18 painted. Rusticated stucco ground floors, Nos 7, 9, 10, and 16-18. Painted ground floors, Nos 6, 11, 12, 14, 15 and 19-25. 4 storeys and basements. 2 windows each. Architraved, round-arched ground floor openings. Doorways, where unaltered, with pilaster-jambes carrying cornice-heads; patterned fanlights and panelled doors. Entrance to No. 7 in single storey stucco extension on left hand return. Nos 7 and 25, square-headed ground floor windows. Gauged brick flat arches to assortment of recessed casements and sashes on upper floors; 1st floors with architraves and cast-iron balconies. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with bud finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 105)."*

9.7 The terrace was originally listed on 14 May 1974. The application site has railings at front, but notably is missing a number of ornate exterior balconies and balustrades at first floor level (which are referred within the listing description above) and now contains many non-conforming windows. As a result the façade of the application site is at odds with other properties in the terrace.

### The Bloomsbury Conservation Area

- 9.8 The Bloomsbury Conservation Area incorporates the area between Euston Road to the north; Gray's Inn Road, High Holborn to the south and Tottenham Court Road to the west and covers Marchmont Street. The development of the area began in the late 17th Century with Bloomsbury Square. Subsequent development was undertaken on a speculative basis, with plots of land surrounding the square being sold off for terraced housing and developed in line with the classical brief of the Opera House. According to the Bloomsbury Conservation Area Statement, the area is characterised by three or four storey terraces, constructed in a rectangular street pattern and incorporating open squares.
- 9.9 The Bloomsbury Conservation Area Appraisal and Management Strategy (adopted 18 April 2011) provide some relevant background information on the site.
- 9.10 Paragraph 5.230 of the Appraisal confirms that the area around Argyle Square was one of the last land parcels to be developed in the 1830s and 1840s having previously been the site of the failed Panharmonium Pleasure Gardens an over-ambitious and short-lived project from 1830-1832. The surrounding streets are likely to have been built earlier, Crestfield Street and Birkenhead Street were laid out from 1825; Argyle Street from 1826 and St Chad's Street from 1827. However, it is noted that *'The architectural and historic interest to this area is reflected in the fact that the majority of the buildings are listed. The conversion in the 20<sup>th</sup> century of a number of the properties to hotel use has given rise to a plethora of signage, painted brickwork, additional downpipes and unsympathetic replacement of sash windows and front doors that detract from the homogeneity of the terraces.'* It is noted that four storey town houses around The Square have a classical appearance with consistent parapet lines, decorative stucco banding, large first floor windows with stucco surrounds, arched ground floor doors with a parapet concealing the roof.

## **Impact Assessment on Assets of Heritage Significance**

9.11 Both the application site itself and the Bloomsbury Conservation Area are designated heritage assets. As such, an assessment of the impact of the application proposal on these designated heritage assets is required. An assessment of the impact of the application proposals on each of these is now considered in turn below.

### Impact on Nos. 16-18 Argyle Square (Application Site)

9.12 It is considered that the application scheme overall results in significant heritage benefits and an enhancement of the existing listed building.

9.13 The overall redevelopment of the Montana Hotel has significant benefits to 16 Argyle Square, particularly in respect of the front elevation. However, whilst these positive benefits to the front elevation, these are not relevant to the rear extension.

9.14 The rear extensions on site are not original but stem from the early 1990s. They have been assessed by the Council's Conservation Officer when reviewing the previous applications for refurbishment of the site. It has been acknowledged by the Council's Conservation Officer that the rear extensions on the site have no heritage merit. The extensions have already been demolished and it is now proposed simply to rebuild them in a '*like for like*' fashion.

9.15 The proposed rear extensions mimic those previously existing on site and it was proposed to simply rebuild what was already there. As such, the heritage impact of the rear extensions is already existing and acknowledged. In this respect, the proposed application does not raise any impact on any heritage asset of note through the rebuilding of the previously existing rear extensions.



### **Impact on the Bloomsbury Conservation Area**

- 9.16 In terms of any impact on the Bloomsbury Conservation Area, this is related to any impact on the group value of the listed buildings which contribute to the character of this part of the Bloomsbury Conservation Area. It is not considered that the proposed changes will have any adverse impact on the Bloomsbury Conservation Area.
- 9.17 Indeed, for the reasons set out above and because of the positive changes to the front elevation, it is considered that the application results in an enhancement of the group value of the terraced houses on the eastern side of Argyle Square which in turn ensures that the impact on the Bloomsbury Conservation Area is entirely positive.
- 9.18 On the basis that the application proposed is simply the rebuilding of the rear extensions as they were, as such and given the location of the extensions to the rear of the property, it is not considered that the rebuilding of the rear extensions in a *'like-for-like'* form has any adverse impact on the Bloomsbury Conservation Area.

### **Summary**

- 9.19 Overall, it is considered the application proposal has positive benefits to both the listed host building and to the wider Bloomsbury Conservation Area.

## **SECTION 10: SUSTAINABILITY**

- 10.1 It is the case that sustainability measures are now to be achieved through Building Regulations rather than the Planning System. As such, it is considered that the application proposal is acceptable in respect to the issue of sustainability.
- 10.2 In terms of the sustainability of the proposal it must be appreciated that the site is already an existing hotel and is a listed building. However, in terms of the wider sustainability issues the proposal results in the following sustainability benefits:
- Green roofs are incorporated which will reduce run-off, create greater bio-diversity and help reduce urban heat island effects;
  - Opportunity for segregation of recyclable waste will be achieved;
  - Windows will be timber;
  - Consideration will be given to low impact construction materials for any new building works including FCS timber, low VOC paints and material built-ups that achieve an A-rating in the Green Guide.
- 10.3 Overall, it is therefore considered that the application is acceptable in terms of sustainability and sustainability benefits.
- 10.4 All of the above sustainability benefits remain and in respect to the proposed rear extensions the sedum roof is, again, proposed.

## SECTION 11 CONCLUSIONS

- 11.1 This Planning, Design, Access and Heritage Statement has been prepared on behalf of St Pancras Hotel Group in support of a retrospective application for full planning permission and an associated retrospective application for Listed Building Consent for the demolition and rebuilding of rear extensions at the Hotel Montana at 16-18 Argyle Square, London, WC1H 8AS.
- 11.2 The application site comprises the existing Hotel Montana (use class C1) which is located at 16-18 Argyle Square and forms part of a terrace of Grade II listed buildings. The application site benefits from full planning permission and Listed Building Consent for comprehensive refurbishment of the hotel. Specifically, full planning permission (LPA Ref: 2016/0153/P dated 30 November 2016) has been granted for *“Reinstatement of front balconies, replacement windows at front and rear, reinstate external window mouldings, replacement front doors, staircase to front lightwell, sedum roof to ground floor rear projecting wings; re-alignment of windows at rear lower ground floor and replace with aluminium double glazed windows, all to existing hotel”*. The associated Listed Building Consent (LPA Ref: 2016/0495/L) for the same description of development is also dated 30 November 2016. Works for the refurbishment of the hotel are currently underway. The above extant permissions in respect of the rear extensions included the refurbishment of the three rear extensions along with various remodelling work.
- 11.3 However, whilst construction works were underway, during the strip out phase of the rear extensions, significant structural issues became apparent which included:
- Foundations insufficiently sized, between 450-600mm deep;
  - Roof timbers insufficiently sized;
  - Floor timbers insufficiently sized;

- Failure of the damp proof course leading to extensive rising damp;
- Structural movement and cracking to various walls;
- Issues with damp and mould growth due to cavity wall insulation being insufficient and in many areas missing;
- Damp to roof timbers due to significant water ingress to all three rear extension roofs.

11.4 Following a costing to address these works, it was apparent that it was more economic to demolish and rebuild the structures given that the works required to remedy the above defects effectively required very extensive rebuilding in any event. The rear extensions have been the subject to previous investigation by the Council's Conservation Officer and it has been agreed that the rear extensions are of no specific heritage merit. It is acknowledged that these works require retrospective planning permission and Listed Building Consent. Following discussions with Angela Ryan, Planning Enforcement Officer, at LB Camden, with associated correspondence dated 25 September 2017; a formal retrospective planning application and application for Listed Building Consent is now submitted.

11.5 The application proposes the rebuilding of already demolished rear extensions which were of no heritage value being built in the early 1990s. It is intended to rebuild the rear extensions in a form as they were and on this basis it is not considered that the application proposal will have adverse effect on either the listed building itself or the character of the Bloomsbury Conservation Area. For this reason, it is respectfully requested that retrospective planning permission and Listed Building Consent be granted.