

**Doubletree by Hilton London – West End  
Southampton Row  
London WC1B 4BH**



**DESIGN & ACCESS STATEMENT**

Prepared by:



February 2018

# Doubletree by Hilton London – West End

Document History		
Revision	Comments	Date
-	First issue	Feb 2018

**Job no.** 3829D

**File ref.** F:\admin\3800 SERIES\3829D\EI\Planning v2\ID & A Statement - JAN 2018 .docx

**Contents**

Introduction..... 4  
Site and Surroundings ..... 5  
Relevant Planning History ..... 6  
Proposed Development ..... 7  
Development Plan and other Material Consideration..... 8  
Planning Considerations..... 12  
Conclusion..... 21

## 1.0 Introduction

- 1.1 This design & access statement has been prepared in accordance with the instructions of the owner of the existing Doubletree by Hilton London-West End, Crimson Hotels Ltd, in support of the provision of a three story extension to the existing building at 92 Southampton Row, London, to provide additional bedrooms in relation to the current hotel operations.
- 1.2 The hotel is in a highly accessible central location and benefits from excellent transport links. The existing hotel is currently operating near to capacity and a need for additional bedrooms to cater for increasing numbers of visitors to the area has been identified. The proposal is for the provision of an additional 3 hotel bedrooms formed around a small lightwell. A three story element will be reconfigured within the hotel complex situated behind the hotel block which fronts Old Gloucester Street. The proposed extension will not be visible from Old Gloucester Street & the existing five story building height will be maintained.
- 1.3 The extension to the hotel has been developed with technical guidance from M&E consultants.
- 1.4 This statement provides a review of the site and surroundings, design & access, outlines the recent planning history of the site, and assesses the proposals in relation to the planning policy framework. This statement confirms that the development scheme is in accordance with the relevant national and local policies.
- 1.5 The following is a list of drawings, which accompany the planning submission:

3829D	110	Site Location Plan
	111 A	First Floor Plan - As Existing
	112 A	Second Floor Plan - As Existing
	113 A	Third Floor Plan - As Existing
	114 A	Fourth Floor Plan - As Existing
	115 A	Elevations/Sections A & B As Existing
	116	Courtyard - As Existing
	211 A	First Floor Plan - As Proposed
	212 A	Second Floor Plan - As Proposed
	213 A	Third Floor Plan - As Proposed
	214 A	Fourth Floor Plan - As Proposed
	215 A	Elevations Sections A & B As Proposed
	216	Courtyard - As Proposed

## 2.0 Site and Surroundings

- 2.1 The property fronts on to Southampton Row. Is identified within the development plan as within the Bloomsbury conservation area. The site is within the central London area.
- 2.2 The hotel is well located for both tourists and business travellers. The development is in a highly accessible location which benefits from many good transport links. This is reflected in its public transport accessibility level of 6B, identifying it is excellent accessibility by public transport. The premises are within easy reach of public transport with Holborn tube station and Russell Square (Piccadilly Line and Central Line) located in 50 m away. Also in walking distance of Tottenham Court Road and Chancery Lane tube stations. There are a number of bus stops located on Southampton Row providing links throughout London.
- 2.3 The existing site consists of and five story building which comprises a 4 star hotel with 247 bedrooms. Access to the property is from Southampton Row, with servicing access provided at the rear from Old Gloucester Street.
- 2.4 The surrounding area has a mixture of commercial & retail premises located predominantly on the lower levels of the neighbouring buildings.
- 2.5 The area contains a mix of building forms, styles and heights. The West side of Southampton Row comprises Victoria House, a large scale building. To the East of the site is mixed use, with residential, galleries and learning centres.

## 3.0 Relevant Planning History

- 3.1 The Doubletree by Hilton brand has operated at the hotel since 2009. Formerly the hotel was known as the Park Inn and the Boddington Hotel.
- 3.2 Planning Permission 2014/1583/P was granted in 2014 for the conversion of basement meeting rooms and ground/first floor plant and staff accommodation into 10No. guest rooms with the creation of lightwells and associated alterations.
- 3.3 Planning Permission 2011/1513/P was granted for the amendments to relocate plant pursuant to planning permission dated 11<sup>th</sup> October 2010 (ref. 2010/3235/P) for the installation of plant, risers and ducts following demolition of selected plant from higher and lower roof levels of existing hotel (Class C1).
- 3.4 Planning Permission 2015/7269/P was granted for the demolition of the 4<sup>th</sup> & 5<sup>th</sup> floors which front Old Gloucester Street & the rebuilding of the same floors with a new configuration. Acoustic screening was also added at roof level on the link block.

## 4.0 Proposed Development

- 4.1 The proposed development is for the extension of an existing link block to provide an additional 3 bedrooms around a newly formed lightwell.
- 4.2 The hotel has identified a growing need for additional hotel rooms in this location, as there is growing visitor numbers to Central London, which is also identified by the Council in the Development Management Policies document. The proposal will assist the operator in meeting increased demand and ensuring the hotel continues to provide exemplary facilities to maintain and enhance its status as a high quality 4 star hotel.
- 4.3 The hotel has instructed Morrison Design to design a scheme to deliver additional hotel rooms ensuring the design does not impact adversely to the surrounding properties.

## 5.0 Development Plan and other Material Consideration

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the development proposal to be considered in accordance with the statutory Development Plan and other considerations.
- 5.2 The following section provides a brief overview of planning policy guidance of relevance to the proposed development. This statement demonstrates how the development compiles with key objectives of planning policy and guidance at a national, regional and local level.

### National Planning Policy Framework (NPPF)

- 5.3 The NPPF, published in March 2012, forms the national planning policy guidance document. Set out below are some of the relevant sections of the NPPF.
- 5.4 The NPPF identifies the Government's commitment to securing sustainable economic growth and confirms that in determining development proposals local Planning Authorities should apply in the presumption in favour of sustainable development. It also advises significant weight should be attached to the benefits of economic growth.
- 5.5 Paragraph 2 states that *'Planning Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise'*. It goes on to state that the NPPF *'is a material consideration in planning decisions'*.
- 5.6 Core planning principles contained within the NPPF include the need to support sustainable economic development, to respond positively to growth, and to secure high quality design.
- 5.7 Section 1, *Building a strong, competitive economy*, states that the Government is committed to supporting sustainable economic growth. As such, the planning system should operate to encourage and not act as an impediment to sustainable economic growth. In particular, local authorities should support existing business sectors in their area.



## **Development Plan**

5.8 The development plan is formed of the following documents:

- London plan (2011)
- Camden Core strategy (2010)
- Camden development policies (2010)

5.9 Relevant local policies are outlined below.

## **Relevant development plan policies**

5.10 The site is the following designation within Camden adopted LDF proposal map

- Central activities area
- Bloomsbury conservation area
- Archaeological priority area

## **London Plan (2011)**

5.11 The relevant policies to the London plan are:

- **Policy 4.5** - London's visitor infrastructure

## **Camden Core Strategy (2010)**

5.12 The policies of particular relevance to this application scheme are:

- CS1 – Distribution of growth
- CS3 – Other highly accessible areas
- CS5 – Managing the impact of growth and development
- CS8 – Promoting a successful and inclusive Camden economy
- CS9 – Achieving a successful Central London

- CS11 – Promoting sustainable and efficient travel
- CS13 – Tackling climate change
- CS14 – Promoting high quality places and conserving our heritage
- CS18 – Dealing with waste and encouraging recycling
- CS33 Social and Community Infrastructure;

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

5.13 The policies of particular relevance to this application scheme are:

- DP1 – Mixed Use Development
- DP14 – Tourism development and visitor accommodation
- DP17 – Walking, cycling and public transport
- DP18 – Parking standards and limiting the availability of parking
- DP19 – Managing the impact of parking
- DP22 – Promoting sustainable design and construction
- DP24 – Securing high quality design
- DP25 – Conserving Camden’s heritage
- DP26 – Managing the impact of development on occupiers and neighbours
- DP28 – Noise and vibration

**Supplementary Planning Guidance**

5.14 In addition to the Development Plan documents, Camden have prepared Planning Guidance (2011) which should be given consideration in the preparation of development proposals. The relevant guidance includes:

- CPG1 – Design
- CPG6 – Amenity

## 6.0 Planning Considerations

6.1 The key considerations in this case are the principle of the provision of additional hotel accommodation; the scale, form and massing of the proposed extension and the visual impact within the hotel complex, on the character and appearance of the Conservation Area and nearby listed buildings; and the impact of the extension in terms of transport, sustainability and surrounding occupiers.

### Principle of hotel development

- 6.2 Policy CS1 of the Core Strategy seeks to focus growth in the most suitable locations. Central London is identified to be a highly accessible location appropriate for development, with Holborn identified as a growth area where development is to be concentrated. The policy promotes the most efficient use of land and buildings in Camden.
- 6.3 The proposal results in the expansion of the existing hotel on site. London Plan Policy 4.5 supports London's visitor economy and encourages Borough's to stimulate growth. Core Strategy Policy CS8 recognises the importance to the economy of other employment generating uses, including tourism. The Core Strategy identifies that the visitor economy contributes £566 million per annum and provides around 16,500 jobs in Camden, which is 10% of all tourism related employment in inner London. It notes that the Council recognises the importance of the visitor economy in Camden and will support the continued growth of the sector, with Core Strategy Policy CS9 providing support for Central London as a focus for growth, including for hotels.
- 6.4 Policy DP14 seeks to support tourism development and visitor accommodation. It seeks for all visitor accommodation to:
- Be easily accessible;
  - Provide any necessary off-highway pick up and set down points for taxis and coaches;
  - 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.
- 6.5 The site is located within an area identified for growth and as being appropriate for the provision of additional visitor accommodation.
- 6.6 The proposed extension to this use is located in a highly accessible location. This is reflected in its Public Transport Accessibility Level of 6b, identifying its "excellent" accessibility by public transport. The site is within easy reach of public transport, with Holborn Tube Station (Piccadilly Line and

Central Line) and Russel Square located 150 metres away. Also in walking distance are Tottenham Court Road and Covent Garden Tube Stations. There are a number of bus stops located on Southampton Row providing links throughout London.

- 6.7 The proposal provides an extension to the existing hotel, delivering new hotel bedrooms to assist with meeting existing and future demand within this central location. The area is largely commercial in nature, with residential dispersed throughout the wider area. The proposal as providing an extension to the existing building is complimentary to the uses in the area and will not have any harm on the balance of uses within the area. The use will maintain the character of the area and will continue to provide accommodation for visitors and businesses within this area, assisting to support the local community in this location.
- 6.8 The extension and use as proposed and located will have no harmful impact on the amenity of surrounding occupiers, will result in no unacceptable impacts on the highway network as located in a highly accessible location and utilising the existing hotel servicing infrastructure on site. The proposals have been designed to ensure the construction and operation of the additional hotel rooms is as sustainable as possible as providing an extension to this existing building. Further details of the amenity, transport and sustainability considerations are included below.
- 6.9 The proposal is therefore in compliance with London Plan Policy 4.5, Core Strategy policies CS1, CS8 and CS9, and Development Management policy DP14.

### **Mixed Use Development**

- 6.10 Development Policy DP1 'Mixed use development' states that the Council will require a mix of uses where appropriate in development proposing over 200 sq metres (gross) of floorspace. The proposal is 136 square metres which falls below the 200 sq metre threshold.
- 6.11 The proposal is made by the operators of the hotel to provide them with much needed additional accommodation to support their operation and further demand for hotel accommodation within this Central London area.
- 6.12 The proposed extension to the hotel is attached to one of the linking blocks situated behind the two street frontages of the property and makes use of the existing building entrances, communal areas, cores and servicing arrangements located on the existing floors of the hotel below. The proposed extension will provide circa. 136 square metres of new floorspace to enable the expansion of the existing operation. Para.1.19 of the Development Policies notes that it may be appropriate for developments involving a relatively small addition to floorspace (under 1,000 sqm gross) to make a contribution to secondary used instead of on-site provision, The proposal is below 200 sqm and due to the location of the proposed extension, the limitations on space within the site and existing hotel, and access and servicing constraints, this means that the provision of a separate use as part of the proposals would not be practical or feasible in this case.

6.13 The information below provides a detailed assessment against the relevant criteria set out in Policy DP1:

a) *The character of the development, the site and the area;*

The entire site contains an established hotel on all levels of the existing building. The character of the site and the area is principally commercial in nature to the south of the site with residential to the north.

The proposed development is to provide an extension to the existing hotel at 1<sup>st</sup>, 2<sup>nd</sup> & 3<sup>rd</sup> floor levels to meet existing demand for additional hotel accommodation in this commercial location. The proposal will be linked physically and operationally to the existing hotel, providing the necessary space for expansion for the current business.

The existing hotel provides current bar and restaurant facilities at ground floor and basement levels which are open and available to visiting members of the public, as well as guests. As such the hotel by its nature, and as a result of its current facilities and operation, already provides for a range of services in this area.

b) *Site size, the extent of the additional floorspace and constraint on including a mix of uses;*

The potential to accommodate a range of alternative uses as part of the proposed extension to the building have been considered in the scheme's development. A number of key requirements for the inclusion of a secondary use has been identified:

- The need to provide a ground floor entrance and accommodation with an active frontage and window display for any retail or alternative commercial operator;
- The need to provide additional servicing for any retail or alternative commercial operator;
- The need to provide additional access cores to the upper levels for any residential accommodation;
- The need to provide a separate ground floor entrance and lobby to the new access core for any residential accommodation;
- Additional servicing requirements for residential accommodation.

The work that has been undertaken in preparing the scheme has concluded that the constraints of the existing hotel building, as well as the coverage of the existing building across the entire site area, prevent the ability to include additional uses within the current building or as part of the

extension to the property - which is entirely contained on the upper levels. Detailed reasons are set out below:

### Ground Floor Space

- The ground floor of the hotel provides the relevant ancillary and support services (front and back of house facilities) required to operate the overall hotel. A copy of the ground floor plan is contained within Appendix 1. The ground floor contains the hotel restaurant, entrance lobby and concierge, bar, and servicing accommodation. These facilities are essential to the operation of the premises as a 4\* hotel at this level and already make efficient use of the space available in relation to a hotel of this size. There is no available surplus floorspace and these existing functions cannot be removed in order to create either a residential entrance and lobby, or a retail or leisure unit, at ground floor level.
- The existing building covers the entire site area at ground floor level. As such there is no potential to extend the existing building at the lower level to provide either retail accommodation or a residential entrance and lobby.

### Separate Lift Access to the Upper Levels

- The hotel operates with three customer lifts providing access to all floors of the building. The executive lift which will be upgraded and extended to service the reconfigured floors lifts to cater for an additional guest rooms, a residential use would require a separate dedicated lobby and lift access. It would not be feasible to operate the existing hotel with a reduction in customer lifts and would not adequately or safely be capable of serving 247 guest rooms. The upper floors are also currently served by a goods lift and staff service lift, these are required to service the 247 rooms within the hotel and are accessed from back of house areas only. There is therefore no opportunity to take an existing lift out of hotel use to provide a separate lift access to residential accommodation within the existing building cores. As such a residential use would require the provision of a new access core to provide a dedicated lift access.
- As detailed above, the building has already maximised the site coverage at ground floor level and there is no potential for extensions at the lower level. As such there is no opportunity to provide additional floorspace at ground floor to accommodate a new residential access core to serve the upper levels.
- In addition, as noted, the existing ground floor accommodation is currently utilised to provide facilities essential to the operation of the hotel. There is therefore no opportunity to provide a new residential core within the existing building envelope to serve the upper levels.

## Servicing

- The proposed additional guest rooms will be serviced as part of the existing hotel arrangements currently in place. The additional rooms will be able to make use of the existing waste storage arrangements and back of house facilities. The additional hotel rooms will also be able to be catered for within the current number of deliveries to the site, with capacity within current deliveries and collections to cater for the 3 additional guest rooms.
- The provision of an alternative use would need separate servicing, both in terms of on-site facilities and deliveries and collections. A separate dedicated facility for the storage and collection of waste and recycling will be required in relation to any alternative use in an accessible ground floor location. As detailed above, there is no capacity within the site to accommodate these additional services at the lower level.
- In terms of deliveries and collections, these are undertaken from the rear of the hotel by small servicing vehicles. This rear access route is only accessible by small commercial vehicles – see the rear passage on the existing ground floor plan. Additional servicing to and from the premises for either a retail, commercial or residential use through large vehicles would have to take place from the front of the site and would conflict with the pedestrian guest entrance and the movement of taxis and other activities on an already busy street.

The proposal therefore clearly demonstrates that a secondary use cannot be accommodated on site due to the constraints that exist in relation to the site and physical and operational constraints related to the existing building and its use.

- c) The need for an active street frontage and natural surveillance;

The proposal is for an extension and alterations to the existing hotel at 1<sup>st</sup>, 2<sup>nd</sup> & 3<sup>rd</sup> floor levels. There is no potential to change the existing frontage of the hotel at street level which accommodates the hotel entrance, and front of house guest facilities. The existing hotel provides an active frontage used by visiting members of the public on a 24/7 basis providing activity and vitality in this location. The proposed extension would add to this, with additional visitors providing increased investment into the surrounding uses within the area.

- d) The economics and financial viability of the development including any particular costs associated with it;

There is a requirement to keep the hotel operational during the construction period and to ensure only minimal disruption. The hotel operates under the Doubletree by Hilton brand, however is owned by a private family, therefore any significant disruption to the existing use



would mean that development would not be possible. This therefore further limits the potential to make alterations to the existing hotel as part of the proposals.

- e) Whether an extension to the gross floorspace is needed for an existing user;

Para. 1.23 states that the Council may not seek secondary uses where a development is required to accommodate an existing user on the site (for example, to provide for the expansion of a business), unless the development involves additional floorspace that is surplus to the user's requirements.

In addition to the physical constraints which prevent the provision of a secondary use within the building, the extension is proposed by the existing hotel operators to enable the expansion of the existing building for hotel use. The proposal creates 3 hotel bedrooms. The hotel is currently operating at the top end of its occupancy and therefore a need for additional bedrooms exists to meet demand. As such there is no additional floorspace proposed that is surplus to the user's requirements and there is no potential within the site to add further accommodation.

- 6.14 The proposal therefore has demonstrated through a number of criteria within Policy DP1 that a mix of uses cannot be accommodated on site.
- 6.15 The applicant is a hotel operator seeking to expand its existing business to meet demand and therefore does not own any other properties or sites within the borough. As such they have no access to alternative sites within the area on which to deliver off-site provision. As such the applicant is proposing to make a payment in lieu in line with the Development Policies and the Council's formula.
- 6.16 Based on 180 sqm of additional accommodation, a payment per sqm is not required to be applied to half the proposed floorspace. As such the proposal is in full accordance with Policy DP1 given the above considerations.

### **Design, Scale and Visual & Heritage Considerations**

- 6.17 Core Strategy policy CS14 seeks to ensure that Camden's places and buildings are attractive, safe and easy to use. The policy requires development to be of a high standard of design that respects local context and character, preserves heritage assets and their setting.
- 6.18 Development Policy DP24 requires all developments to consider the character, setting, context, form and scale of neighbouring buildings; the character and proportions of the existing building – where extensions are proposed; the quality of materials uses; the appropriate location of building services equipment; the provision of appropriate amenity space and accessibility.

- 6.19 Development Policy DP25 seeks to maintain the character of Conservation Areas and preserve the borough's listed buildings.
- 6.20 The proposed extension has been developed with consideration to the neighbouring buildings to the South-East of the site. The proposed extension will not form part of the streetscene. The proposal seeks to respond to the scale and form of its neighbours.
- 6.21 The design and massing of the extension is lower than the hotel, sitting behind the main rear elevation and has no impact at street level. No part of the extension is visible from Old Gloucester Street.
- 6.22 The proposed extension has been designed to be proportionate to the existing Hotel building, and to respect its character.

### **Amenity**

- 6.23 Core Strategy policy CS1 requires to take into account amenity in making full use of existing sites and buildings. Core Strategy policy CS5 protects the amenity and quality of life of local communities, and seeks to make sure that the impacts of development on their occupiers and neighbours is fully considered.
- 6.24 Development Management Policy DP26 seeks to protect amenity, including:
- a) Visual privacy and overlooking;
  - b) Overshadowing and outlook;
  - c) Sunlight, daylight and artificial light levels;
  - d) Noise and vibration levels;
  - e) Odour, fumes and dust;
  - f) Microclimate.
- 6.25 The proposed extension is located within a largely commercial area, with residential properties to the north.
- 6.26 The design of the scheme has taken account of the surrounding properties within the area. The windows are to be located within the south-east elevations of the extensions and within a newly formed lightwell & are positioned to avoid any unacceptable overlooking to existing properties surrounding the site. The proposal will not result in any unacceptable overlooking to habitable rooms.
- 6.27 The extension as located within the site of the hotel complex and sits below the adjoining roof levels behind the main facades to minimise any interruption to light to the adjoining properties surrounding

the site and with no harmful loss of outlook. The proposal has also been assessed for any impact on sunlight or daylight to surrounding properties, please see accompanying Daylight and Sunlight Report prepared by GIA.

- 6.28 Existing supply & extract plant will be relocated to the inner courtyard and will therefore not affect neighbouring residential units.
- 6.29 The proposal will have no harmful impact on the amenities of surrounding occupiers and will ensure that a suitable level of amenity is provided within the new hotel accommodation. The proposal is therefore in accordance with Core Strategy Policy CS1 and CS5, and Development Policy DP26.

### **Transport**

- 6.30 Core Strategy Policy CS11 promotes sustainable and efficient travel. Development policy DP16 requires developments to be properly integrated with the transport network, whilst DP17 promotes walking, cycling and public transport. DP18 expects car-free development in central areas.
- 6.31 Development Policy DP20 relates to the movement of goods and materials and seeks to reduce the impact of movements by road.
- 6.32 The site is in a highly accessible location with a PTAL of 6b. The majority of those utilising the existing hotel visit by public transport, with use of taxi also noted.
- 6.33 The site is in a location which is highly accessible by public transport with a range of frequent services within walking distance of the site. The proposed extension to the number of hotel bedrooms related to the existing hotel is predicted to generate a small number of additional person trips in the morning and evening peak hours, the majority of which are expected to be made by non-car modes with less than a third being made by taxi. Overall the impact of the proposals on the local transport network are identified to be imperceptible.
- 6.34 No car parking will be provided on site and the proposed extension will utilise existing deliveries, and off-site servicing arrangements, in the delivery of goods. Servicing and waste collection will continue as existing arrangements. Staff will continue to be able to store cycles within the staff changing facilities, whilst any guests arriving by bicycle will be able to make use of the secure luggage facility near the hotel reception.
- 6.35 The proposal is in compliance with Core Strategy Policy CS11, and Development Management Policies DP16, DP17, DP18, DP19 and DP20.

## **Sustainability**

- 6.36 Core Strategy Policy CS13 relates to climate change and promotes higher environmental standards. It seeks to ensure that patterns of land use minimise the need to travel by car, promotes the efficient use of land and buildings, encourages developments to minimise carbon emissions and seeks to ensure buildings can minimise the effects of climate change.
- 6.37 The site is in a highly sustainable location as within an area of excellent accessibility to local public transport networks and within proximity of a range of services and facilities. The proposed use will optimise the use of the site and will provide appropriate additional hotel accommodation which will utilise the existing services and operations of the existing hotel. The location, form and use of the proposal are therefore highly sustainable in principle.
- 6.38 Overall the scheme has been appropriately informed and has developed incorporating sustainability principles where achievable. The proposals meet the key policy objectives and will deliver a building with improved sustainability performance in this highly sustainable location, in compliance with the policies of the Development Plan.

## 7.0 Conclusion

- 7.1 This statement is submitted on behalf of the owners and operators of the Doubletree by Hilton London – West End, 92 Southampton Row in support of the provision of four new hotel bedrooms within four storey extension to the existing link building
- 7.2 The hotel is in a highly accessible location and benefits from excellent transport links. The existing hotel is currently operating near to full capacity and a need for additional bedrooms to cater for increasing numbers of visitors to the area has been identified. The proposal will provide an appropriate and complementary use in this location within the Central Activities Area, helping to assist local businesses and tourist facilities.
- 7.3 The proposed scheme is of a scale, form and design which respects the existing building, and is proportionate to the character and appearance of the neighbouring properties. The extension is designed such that it will maintain the character and setting of the Conservation Areas, preserve the surrounding listed buildings.
- 7.4 The proposal as designed will have minimal impact on the amenities of the surrounding properties in terms of loss of light, outlook and overlooking.
- 7.5 The proposal will not result in any adverse transport impacts, and will utilise the existing servicing and drop off facilities. The extension has been designed taking account of sustainability principles in relation to construction and operation. In terms of energy the proposal has been developed with consideration of the energy hierarchy and the Development Plan policies to ensure a lean, clean and green extension.
- 7.6 Overall, it is considered that the proposal will have a positive impact and delivers sustainable development that is compliant with both Development Plan and national policies.

Appendix 1

