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Planning Statement

Nos. 64 and 65 Guilford Street
Bloomsbury

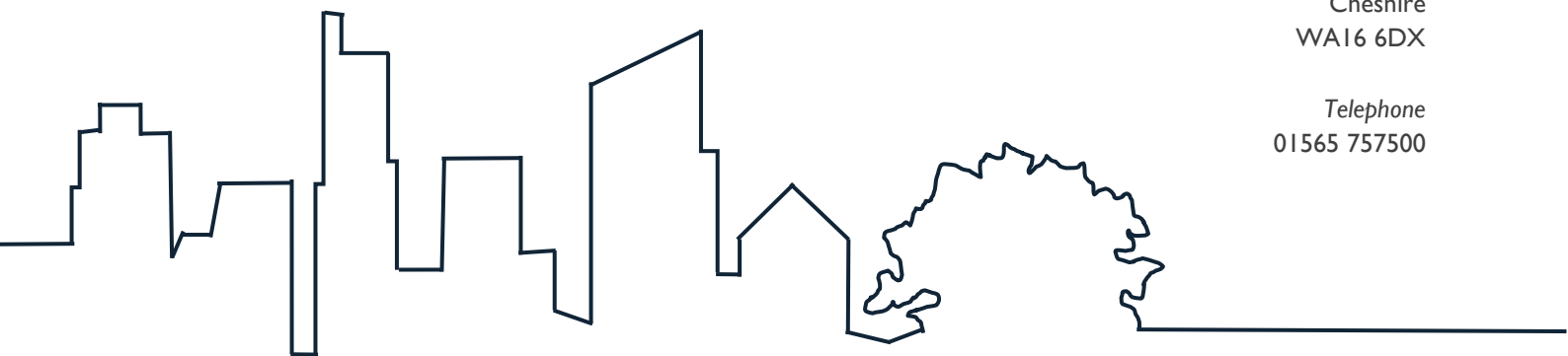
On behalf of Imperial London Hotels Ltd

June 2017

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I INTRODUCTION

- I.1 Walsingham Planning has been instructed by Imperial London Hotels Ltd (ILH) to prepare this Planning Statement to support an application for full planning permission and listed building consent in relation to proposals at Nos. 64 and 65 Guilford Street, Bloomsbury.
- I.2 The application seeks full planning permission and listed building consent for the change of use of the buildings from a hostel (Sui Generis) to Use Class C3 (dwelling houses) providing:
- 9 x 1 bedroom apartments for staff accommodation for ILH workers at No. 64 and;
 - 9 x 1 bedroom apartments for staff accommodation for ILH workers and / or private rented accommodation at No. 65.
- I.3 To enable the development of the proposed apartments, the application also seeks full planning permission and listed building consent for the demolition of the existing closet wings on Nos. 64 and 65 and the construction of a three-storey extension to the rear of each building. An extension to the loft area of each building is also proposed, in addition to internal alterations and external restoration works.
- I.4 This Planning Statement should be read in conjunction with the other supporting documentation submitted as part of the application, which is as follows:
- Design and Access Statement prepared by IPA Architects;
 - Heritage Statement prepared by KM Heritage; and
 - Energy and Sustainability Statement prepared by Mecserve.
- I.5 In terms of the structure of this Statement, Section 2 provides a description of the application site, a summary of the site's planning history and details of designations affecting it. In Section 3, we describe the application proposals in the context of the operation of the applicant's business.
- I.6 In Section 4, we provide a detailed review of the relevant planning policy context, including the Development Plan, the NPPF and other material policy considerations. In Section 5, we provide our assessment of the proposed development, particularly in relation to the enhancement and reconfiguration of the hostel which provides staff accommodation for ILH workers. We also address affordable housing matters as well as issues relating to design and amenity and the proposed listed building works.
- I.7 Section 6 sets out our conclusion that the proposed development is acceptable in planning and heritage terms and that the scheme accords with the Development Plan, the NPPF and all other material policy considerations.

2 FACTUAL BACKGROUND

THE SITE

- 2.1 The application site consists of Nos. 64 and 65 Guilford Street. The buildings are of a traditional Georgian style and form part of a terrace row of similar town house properties which extend from Herbrand Street to Grenville Street. The buildings are Grade II Listed and a copy of the Listing is enclosed at Appendix I.
- 2.2 The buildings are four storeys in height and each comprise a large basement and a loft. Each building also has a closet wing to the rear; a non-original feature which provides floorspace at two levels. A small yard area complements each building.
- 2.3 In terms of their recent background, the buildings were purchased by the applicant, ILH, in 1994. In 1996, the Council granted full planning permission and listed building consent for the subdivision and conversion of the buildings to form a single hostel providing accommodation for hotel staff. The hostel was designed to provide accommodation for 32 employees on a short-term basis, noting the transient nature of hotel staff at the time. The conversion works were completed in the late 1990's.
- 2.4 As a result of the conversion works that took place, Nos. 64 and 65 currently form a single planning unit. The hostel comprises 32 bedrooms together with shared amenities consisting of bathrooms and kitchens, and communal areas.

THE SURROUNDINGS

- 2.5 The site's northern boundary is a 5.5m high brick wall. The wall separates the rear elevation of a terraced row of two-storey properties, which front onto Colonnade to the north, and the yard area of each building on site. The adjacent buildings on Colonnade are used for business and office purposes.
- 2.6 To the south, Nos. 64 and 65 Guilford Street face The President Hotel. The hotel is operated by ILH and is approximately 18m in distance from the front of the buildings on site. Russell Square Underground Station is located about 100m to the north of the site.

PLANNING HISTORY

- 2.7 The following planning applications and decisions are of material relevance to the proposed development:
- Application reference: 9501341R3 – In April 1996, the Council granted full planning permission for the erection of a single-storey boiler enclosure at the rear, plus minor

elevational alterations including the reinstatement of an entrance at No. 64, in association with the continued use of the properties (Nos. 64 and 65) as a hostel.

- Application reference: 9570232R3 – In February 1996, the Council granted listed building consent for alterations, refurbishment and internal partitioning in association with the conversion of the buildings to provide a 32 bedroom hostel.

- 2.8 Having regard to the current use of the buildings on site and its planning history, the existing lawful use of the site is a hostel (Sui Generis).

PLANNING AND HERITAGE DESIGNATIONS

- 2.9 As established, Nos. 64 and 65 Guilford Street form part of a listed Grade II terrace. The site also falls within the Bloomsbury Conservation Area.

FLOOD RISK

- 2.10 The site falls within a Flood Zone I and therefore has a low risk of flooding.

3 THE PROPOSED DEVELOPMENT

BACKGROUND

- 3.1 ILH operate seven hotels in the heart of Bloomsbury. The hotels provide 3,335 rooms providing accommodation for approximately 6,500 guests. Appendix 2 contains a schedule and a map identifying the applicant's hotels.
- 3.2 ILH is an independent family run business which has been operating since 1837. It's mission statement as a company is to offer good quality accommodation as well as good value in the centre of London. ILH employ approximately 1,100 staff in its hotels and in its central services, such as their off-site laundry facility.
- 3.3 ILH has provided staff accommodation for some of its employees since the 1920's. The company currently provides accommodation for 339 (approximately 25%) members of staff. In addition to the Guilford Street site, ILH operate seven further staff hostels and staff houses, with further staff accommodated in a number of its hotels.
- 3.4 This includes the accommodation at Nos. 64 and 65 Guilford Street, albeit not all of the 32 bedrooms are currently occupied as ILH are currently not re-letting the rooms, pending the proposed refurbishment and conversion project; the subject of this application.
- 3.5 Like many hostels and buildings providing staff accommodation in the Guilford Street area, Nos. 64 and 65 – forming the application site – have shared amenities (such as kitchens and bathrooms) with relatively basic provision. This is largely reflective of the historical demand for short-term accommodation that existed when the buildings began to provide accommodation for ILH employees in the late 1990's.
- 3.6 As can be seen in the accompanying Design and Access Statement, Nos. 64 and 65 appear tired and neglected and, in our opinion, fall well below the quality of housing envisaged by the Mayor of London. By virtue of the size, configuration and shared nature of the accommodation, ILH no longer consider it to be reflective of the current and future needs for its staff.
- 3.7 In 2014, the average turnover of staff at ILH was less than 30%, which is low for a large hotel group operating in Central London. Staff retention rates are therefore higher than normal and this is leading to a greater demand for higher quality self-contained accommodation amongst staff, particularly long-term and more senior employees. Indeed, there are currently over 100 employees in ILH's '25 year staff club'.
- 3.8 The demand that currently exists for higher quality staff accommodation may also be attributed to the rising cost of living in Central London and the surrounding boroughs. As more staff are looking to remain employed on a longer-term basis at ILH, hostel accommodation currently

provided at Nos. 64 and 65 Guilford Street – which was originally designed to accommodate staff on a short-term basis – is no longer considered desirable.

- 3.9 Notwithstanding the applicant's own observations, the current and future demand for higher quality self-contained staff accommodation has also been recognised by the Council. Paragraph 3.132 of the Camden Local Plan, which was adopted in 2017, states:

“Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation”.

- 3.10 In light of the above, ILH consider it is necessary to reconfigure and extend the Guilford Street site to provide modern and self-contained apartment accommodation.

THE PROPOSALS

- 3.11 The application seeks full planning permission and listed building consent for the change of use of the buildings at the site from a hostel (Sui Generis) to Use Class C3 (dwelling houses) providing:
- 9 x 1 bedroom apartments for staff accommodation for ILH workers at No. 64 and;
 - 9 x 1 bedroom apartments for staff accommodation for ILH workers and / or private rented accommodation at No. 65.
- 3.12 Change of use permission is required because the nature of the accommodation will change from non-self-contained, to self-contained. Unlike the current hostel arrangement where a number of facilities are shared, the proposals seek to create fully self-contained units.
- 3.13 There is an important distinction between the proposed use of each building. Whereas No. 64 will be used entirely as accommodation for key worker staff employed by IHL, more flexibility is required for No. 65 so that it can be used both as staff accommodation for IHL employees, and also as private rented accommodation for non IHL employees.
- 3.14 The building works involve the demolition of the existing closet wings to the rear of Nos. 64 and 65 and the erection of a new three-storey extension to the rear of each building, starting at lower ground level. The loft space in each building will also be extended and converted into usable residential floorspace thus creating a new fourth floor. Overall, the extensions proposed will be of a suitable scale, commensurate with those in the surrounding area, and will consist of traditional materials that are in-keeping with the Conservation Area.
- 3.15 Various internal alterations will be undertaken to the non-original elements of each building. Many of the internal works proposed relate to the reinstatement of original features such as skirting, cornices and doors and will thus enhance the buildings overall heritage status. Each

apartment will provide 1 bedroom for 1 person, as well as a kitchen and living area and a shower room. The apartments will be accessible via a communal hall or a stairwell.

- 3.16 To ensure the delivery of a high quality development, external restoration works will be carried out. In particular, the traditional lime mortar to the rear and front of Nos. 64 and 65 will be repointed where necessary and the non-original sliding sash windows at second and third floor level to the front of each building will be replaced with appropriately designed glazed units.
- 3.17 A more detailed explanation of the internal and external works proposed is set out within the accompanying Design and Access Statement.

4 RELEVANT PLANNING POLICY

INTRODUCTION

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purposes of any determination to be made under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise”.

- 4.2 Any issue that relates to the use and development of land is capable of being a material consideration. This includes Government statements of planning policy.
- 4.3 The Development Plan applicable to the site comprises the Camden Local Plan, which was adopted in 2017, and the London Plan, which was amended in 2016. The Council also has a number of Planning Guidance documents (CPG’s) which are applicable to the development proposals. These are material considerations to which appropriate weight should be given.

NATIONAL PLANNING POLICY FRAMEWORK

- 4.4 The aim of the National Planning Policy Framework (NPPF) is to ensure that there is a presumption in favour of sustainable development and that positive planning solutions are found to ensure economic development is brought forward.
- 4.5 Paragraph 17 sets out the Core Principles which should under-pin planning decisions. The following are considered to be applicable to the development proposals:
- *“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the Country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.*
 - *Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.*
 - *Encourage the effective use of land by reusing land that has been previously developed.*
 - *Promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas.*

- *Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”*

4.6 The Government’s commitment to securing economic growth in order to create jobs and prosperity is set out in paragraphs 18 – 22 of the Framework. It states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. It also makes it clear that:

“Significant weight should be placed on the need to support economic growth through the planning system”.

4.7 In relation to housing, the NPPF is very explicit about the need to significantly boost the supply of housing. This includes planning for the needs of different groups in society.

4.8 Great emphasis is also placed on the need to encourage sustainable patterns of development and to site new development in locations that are accessible by a range of modes of travel, particularly sustainable transport modes. Therefore, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities.

4.9 In relation to design, the Framework states that good design is a key part of sustainable development and should contribute positively to making places better for people.

4.10 Paragraph 128 of the NPPF explains that in determining applications, LPA’s 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 assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 131 adds that in determining planning applications, LPA’s 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.

4.11 Paragraph 134 states that 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.

4.12 Paragraphs 186 – 207 provide guidance on decision taking. It is noteworthy that the Government requires LPA’s to approach decision taking in a positive way, to foster the delivery of sustainable development and for them to look for solutions rather than problems.

4.13 In assessing and determining development proposals, LPA’s are required to apply the presumption in favour of sustainable development. Development that accords with the Development Plan should be approved without delay.

DEVELOPMENT PLAN

LONDON PLAN

- 4.14 Policy 3.5 relates to the quality and design of housing developments. According to the Policy, the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density and tenure. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. New housing developments should also reflect the nationally described space standards. The standards, which are to be interpreted as a 'minima', explain that for a 1 bedroom 1 person apartment with a shower room (and not a bathroom), a minimum of 37 sq.m GIA floorspace should be provided. However, the standards may be interpreted flexibly for proposals which involve listed buildings.
- 4.15 Policy 3.14 deals with the loss of housing. It states that the loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. This Policy also applies to the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily provided to an equivalent or better standard.

CAMDEN LOCAL PLAN

- 4.16 Policy H4 seeks to maximise the supply of affordable housing. The Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq.m GIA or more. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2 per cent for one home and increasing by 2 per cent for each home added to capacity. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.
- 4.17 We consider affordable housing provision in Section 5, having regard to the relevant guidance set out in the Council's Interim Housing CPG (Camden Planning Guidance).
- 4.18 Policy H5 seeks to protect and improve affordable housing. It states that the Council will aim to secure high quality affordable homes of different types and sizes by protecting existing affordable housing floorspace. The supporting text confirms that Policy H5 seeks to protect housing that is provided at less than market costs and this includes hostels and other low-cost forms of housing provided in connection with a job.
- 4.19 Policy H6 relates to housing choice and mix. The Council will seek to secure high quality accessible homes in all developments that include housing. It will encourage the design of all housing to provide functional, adaptable and accessible spaces and will expect all self-contained homes to meet the nationally described space standards, as set out in the London Plan.

However, for listed buildings, the Council will apply a more flexible approach to these standards.

- 4.20 Policy H10 relates to houses in multiple occupation (HMO's). On the face of it, the Policy appears relevant to the application site, as it comprises hostel accommodation for staff associated with ILH. However, the supporting text to the Policy makes clear that staff accommodation and hostels are considered in Policies H4 and H5, as set out above. Policy H10 is therefore of no material relevance to the application proposal and we do not consider it in our assessment of the scheme in Section 5.
- 4.21 Policy D1 deals with design matters. It states that the Council will seek to secure high quality design in new developments. In particular, all new development should respect the local context and preserve or enhance the historic environment. Development should integrate well and should comprise high quality materials which complement local character.
- 4.22 Policy D2 relates to heritage and echoes the policies set out in the NPPF. It states that the Council will require development within conservation areas to preserve or, where possible, enhance the character or appearance of the area. The Council will also resist the total or substantial demolition of a listed building that makes a positive contribution to the character or appearance of a conservation area.
- 4.23 Policy CC2 relates to the adaptation of existing buildings to climate change. Any development involving five or more residential units or 500 sq.m or more of any additional floorspace is required to demonstrate appropriate climate change adaptation measures through the submission of a Sustainability Statement. The Policy also requires conversions and extensions of 500 sq.m of residential floorspace or above to achieve an "Excellent" rating in BREEAM domestic refurbishment.
- 4.24 Matters relating to sustainable construction and climate change adaptation are considered in the Sustainability Statement prepared by Mecserve, which accompanies this planning application.

OTHER MATERIAL CONSIDERATIONS

INTERIM HOUSING CPG

- 4.25 The Interim Housing CPG was adopted by the Council in March 2018. The document provides guidance in relation to residential development standards and supports Policies H4, H5 and H6 of the Camden Local Plan. Specifically, the document provides the Council's latest methodology for the calculation of a payment in lieu of affordable housing.
- 4.26 Having regard to the Council's methodology set out in the CPG, we provide our own calculation for a commuted sum towards the provision of off-site affordable housing at Section 5 of this Statement.

AMENITY CPG

- 4.27 The Amenity CPG was adopted by the Council in 2018. The document provides guidance in relation to matters such as daylight and sunlight provision, overlooking and outlook. It should be afforded weight in the determination of all planning applications for residential development.

MAYOR'S HOUSING SPG

- 4.28 This SPG was adopted in 2016 and provides guidance on the quality of new housing including the nationally described space standards.

DRAFT NPPF

- 4.29 The Government published its draft text for a revised NPPF in March 2018. The text incorporates policy changes previously consulted on through the Housing White Paper (2017), Planning and Affordable Housing for Build to Rent – a Consultation Paper (2017) and Planning for the Right Homes in the Right Places: Consultation Proposals (2017).
- 4.30 Consultation on the draft Framework has concluded. In determining this planning application, it is our opinion that very limited weight – if any – should be given to the draft text of the revised NPPF.
- 4.31 Of relevance to the application proposals, paragraph 62 of the draft text makes clear that LPA's should prepare policies for addressing the housing requirements of groups with particular needs.

DRAFT LONDON PLAN

- 4.32 The new London Plan will set out the Mayor's strategic directions for planning in London until 2041. Consultation on the draft Plan concluded in March 2018 and so its policies carry very limited weight in the determination of planning applications until the start of 2019, when an Examination in Public is scheduled.
- 4.33 Draft Policy H10 very much echoes Policy 3.14 of the adopted London Plan. It states that the loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. This draft Policy applies to the loss of hostels and other forms of staff accommodation.

5 PLANNING ISSUES

INTRODUCTION

- 5.1 In this section of the Statement, we address the relevant land use policy matters, particularly in relation to the enhancement and reconfiguration of existing affordable housing floorspace.
- 5.2 We also consider affordable housing provision, as well as matters relating to design and amenity and the proposed listed building works, having regard to the relevant planning policies.

IMPROVING AFFORDABLE HOUSING FLOORSPACE

- 5.3 Policy H5 of the Camden Local Plan states:

“The Council will aim to secure high quality affordable homes of different types and sizes to meet the needs of existing and future Camden households who are unable to access market housing and create mixed, inclusive and sustainable communities by:

- regenerating existing estates and providing more and better affordable homes at an appropriate density through the Community Investment Programme and Better Homes Programme; and*
- protecting existing affordable housing floorspace [our emphasis] of all types.”*

- 5.4 The supporting text to Policy H5 states that it seeks to protect housing that is provided at less than market costs and this includes hostels and other low-cost forms of housing provided in connection with a job. The definition of affordable housing therefore extends to include staff hostels such as Nos. 64 and 65 Guilford Street.

- 5.5 Policy 3.14 of the London Plan also states:

- “The loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.*
- This Policy includes the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need, unless the existing floorspace [our emphasis] is satisfactorily provided to an equivalent or better standard.”*

- 5.6 As explained in Section 2, the existing lawful use of the site is a hostel. The hostel is a single planning unit and provides accommodation for employees of the surrounding Imperial London Hotels in Bloomsbury. It provides 32 bedrooms with shared facilities such as kitchens, bathrooms and communal areas.

- 5.7 Given the existing lawful use and the function of the site, Policy H5 of the Camden Local Plan and Policy 3.14 of the London Plan are of key material relevance to the determination of this application.

5.8 The supporting text to Policy H5 recognises that there is a mismatch between supply and demand for staff accommodation in Camden. Many older hostels – such as Nos. 64 and 65 Guilford Street – account for a large proportion of staff accommodation in the Borough. By virtue of their size and the historical demand that existed when such facilities first came into operation, many sites still consist of shared amenities (such as kitchens and bathrooms) with relatively basic provision.

5.9 Fast-forward to the present day, such accommodation is no longer deemed attractive, with the Council's own evidence base pointing towards a fresh demand for self-contained higher quality staff accommodation. This is confirmed at paragraph 3.132 of the Camden Local Plan, which states:

“The existing affordable housing stock is heavily skewed to 1 or 2-bedroom homes and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation.”

5.10 In the case of ILH, staff turnover at its Bloomsbury based hotels is currently far lower than the late 1990's. This is relevant as the hostel at Guilford Street was developed in the late 1990's specifically with the intention of providing short-term accommodation for ILH staff. The latest figures from 2014 indicate that average staff turnover at ILH was less than 30% per annum, which is relatively low for a large hotel group operating in Central London. Given the higher than average rate of staff retention that currently exist, there is a strong demand for higher quality self-contained accommodation amongst ILH staff, particularly from senior employees. The demand that currently exists may also be attributed to the rising cost of living in Central London.

5.11 As a result of the contemporary demand that exists, both in general terms and in the case of ILH, Policy H5 has been purposefully designed to protect affordable housing floorspace. This allows the Council to support proposals that adapt hostel accommodation to fit contemporary and future needs such as self-contained apartments, for example, by combining bedrooms.

5.12 It is therefore highly notable that the proposed development does not involve the loss of any floorspace. As explained in Section 3, the development involves the change of use of floorspace from a hostel (Sui Generis) to Use Class C3 (dwelling houses) providing:

- 9 x 1 bedroom apartments for staff accommodation for ILH workers at No. 64 and;
- 9 x 1 bedroom apartments for staff accommodation for ILH workers and / or private rented accommodation at No. 65.

5.13 In fact, a greater quantum of overall floorspace is proposed. The development involves the addition of 283 sq.m (GEA) floorspace by way of a new three-storey extension to the rear of

each building and an extension to the loft areas of each property, thus creating a new fourth floor. The additional floorspace proposed will allow ILH to meet current and future demand for self-contained staff accommodation.

- 5.14 Flexibility is required by the applicant with regards to the occupation of residential floorspace at No. 65. The proposed apartments will be occupied in full or in part as staff accommodation and will be let on the open market when not required for staff accommodation. ILH recognise that there may be occasions in the future when there is a reduction in demand for staff accommodation and so, rather than have an apartment lie vacant, the applicant requires the flexibility to let one or more of the units on the open market.
- 5.15 Notwithstanding, the proposed apartments at No. 65 will always be preferred for staff accommodation. ILH recognise the importance of providing high quality accommodation for its employees and would not seek to prejudice the efficient operation of its hotels by giving preference to a letting on the open market. Where an apartment at No. 65 is vacant, ILH will offer new and existing suitable and qualifying members of staff first refusal, before turning to a letting opportunity on the open market.
- 5.16 Since the proposed development does not involve the loss of any floorspace for affordable housing – in the form of staff accommodation – and instead seeks to enhance and extend it, the proposals should be considered in accordance with Policy H5 of the Camden Local Plan and Policy 3.14 of the London Plan.

AFFORDABLE HOUSING CONTRIBUTION

- 5.17 Policy H4 of the Camden Local Plan requires the provision of affordable housing where one or more additional homes are created. It states that:

“a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity.”

- 5.18 Policy H4 also confirms that:

“where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.”

- 5.19 The 9 apartments proposed at No. 64 Guilford Street should not, in our opinion, trigger any affordable housing requirement. As with the current hostel use, the apartments within No. 64 will continue to provide live-in accommodation for ILH workers only to enable them to better perform their duties and this should be controlled by a planning condition. The function and use of the apartments will differ considerably from traditional open market housing.

- 5.20 We do, however, acknowledge that the 9 apartments proposed at No. 65 will trigger an affordable housing contribution by virtue of the fact that they may, at times, be let on the open market when necessary.
- 5.21 Policy H4 and the Council's Interim Housing CPG advise that development capacity is the starting point for calculating an affordable housing contribution. When a development has capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.
- 5.22 According to the Policy, additional residential floorspace of 100 sq.m GIA is generally considered to create capacity for one additional home. Paragraph IH2.41 of the Interim Housing CPG advises that the Council will round the residential floorspace proposed to the nearest 100 sq.m, to give capacity in terms of the nearest whole number. In the case of the application proposals at No. 65, the development will provide a total of 382 sq.m GIA residential floorspace. Despite the scheme providing 9 x 1 bedroom apartments, the residential floorspace proposed in this building will have capacity for 4 additional homes, according to the Council's methodology. The development capacity calculation is based upon the floorspace proposed and not the number of units proposed.
- 5.23 As the residential floorspace proposed at No. 65 has capacity for less than 10 additional dwellings, a payment in lieu of affordable housing should be accepted by the Council, in accordance with Policy H4.
- 5.24 The next step in calculating affordable housing provision – in this case, a payment in-lieu – is applying the assessment of capacity to the sliding scale. For every further home added to the capacity of No. 65, 2% is added in order to determine an affordable housing percentage target. According to our calculations, No. 65 has capacity for 4 additional dwellings and so on that basis, we calculate an 8% affordable housing percentage target.
- 5.25 The affordable housing percentage target should then be applied to all of the residential floorspace proposed at No. 65. As a payment in lieu of affordable housing is the correct means of providing a contribution, the Council's methodology requires the application of gross external area (GEA) and not gross internal area (GIA). The proposed residential floorspace at No. 65 will provide a total of 557 sq.m GEA.
- 5.26 Applying the affordable housing percentage target (8%) to the total residential floorspace proposed at No. 65 (557 sq.m GIA) generates an affordable housing floorspace target of 44.6 sq.m. In order to calculate the correct payment towards off-site provision, the affordable housing floorspace target should be multiplied by the relevant payment in lieu figure. In the case of the application proposals, the correct payment in lieu figure is £2,650 per sq.m GEA as advised by the Council's Interim Housing CPG (paragraph 2.99 refers).
- 5.27 Accordingly, this will generate a requirement for the applicant to make a payment in lieu of **£118,084** (44.6 sq.m x £2,650) towards the provision of off-site affordable housing.

- 5.28 The applicant is willing to proceed on this basis and understands that this would need to be secured via a Section 106 Agreement, with a payment made prior to the occupation of the apartments at No. 65.
- 5.29 On the basis that a commuted sum for the above amount is pursued, the proposed development should be considered in accordance with the requirements of Policy H4 of the Camden Local Plan.

DESIGN AND AMENITY

- 5.30 Policy H6 of the Camden Local Plan states:

“The Council will seek to secure high quality accessible homes in all developments that include housing. [The Council] will:

- encourage design of all housing to provide functional, adaptable and accessible spaces; [and]*
- expect all self-contained homes to meet the nationally described space standard...”*

- 5.31 With regards to the nationally described space standard, paragraph 3.144 of the Policy supporting text states:

*“Where dwellings will be created from conversions or changes of use, the Council will apply the nationally described space standard **flexibly** taking into account the constraints arising from conversion of existing buildings, particularly listed buildings.” [our emphasis]*

- 5.32 This is relevant as the proposals involve the conversion of listed buildings.
- 5.33 Policy 3.5 of the London Plan makes clear that new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes.
- 5.34 According to Policy 3.5, the Council should seek to ensure that new development reflects the nationally described space standards – which are to be interpreted as minimum standards – as set out in Table 3.3 of the London Plan.
- 5.35 The proposed development consists of 18 x 1 bedroom 1 person apartments. Each apartment is set at a single level and should therefore provide a floor area of at least 37 sq.m GIA, as prescribed by the nationally described spaces standards, noting that each apartment will provide a shower room and not a bathroom. The standards can be interpreted with a degree of flexibility, as noted previously.

5.36 Each apartment, as proposed, will provide the following floor areas:

Apartment Number (refer to the planning drawings)	Floor area (GIA)
No. 64 Guilford Street	-
1	37 sq.m
2	55 sq.m
3	36 sq.m
4	46 sq.m
5	43 sq.m
6	37 sq.m
7	43 sq.m
8	45 sq.m
9	38 sq.m
No. 65 Guilford Street	-
1	35 sq.m
2	54 sq.m
3	36 sq.m
4	51 sq.m
5	43 sq.m
6	38 sq.m
7	40 sq.m
8	45 sq.m
9	40 sq.m

5.37 With the exception of apartments 3 in No. 64 and No. 65 and apartment 1 in No. 65, the quantum of floorspace proposed for all other apartments fully accords with the nationally described space standards. The three apartments that do not accord with the standards are just 1 or 2 sq.m below the standard and in our view, this should not be considered unacceptable given:

- how small the shortfall is; and
- the fact that the space standards should be interpreted flexibly for schemes involving listed buildings, as is the case here.

- 5.38 The proposed apartments should also be considered acceptable in terms of outlook. All habitable rooms will be exposed to a sufficient level daylight and / or sunlight provision, as we explain below.
- 5.39 The outlook from the apartments above ground floor level on the southern elevation will comprise views across Guilford Street from the living areas of 10 apartments. In accordance with best practice, there would be a separation distance of approximately 18m between the windows on the front elevation and the windows on the hotel opposite. At lower ground floor level, the living areas for the two apartments in the southern portion of each building (units 1 and 1) will face a lightwell, with a distance of 2.2m to a vault storage area. The lightwell will provide an acceptable level of daylight provision to each apartment and the outlook is not unusual for basement development.
- 5.40 The outlook from the apartments on the northern elevation, at the rear of Nos. 64 and 65, will also be typical of many residential developments within Central London. The lower ground and ground floors of the new extension to each building will adjoin the site's northern boundary, which comprises a 5.5m high brick wall. The wall sits in front of the rear elevation of the office / business units on Colonnade.
- 5.41 At lower ground floor level, the windows of the bedrooms and living areas for the two apartments in each extension (units 2 and 2) will overlook an area of associated outdoor amenity space, with a distance of 1.5m to the nearest boundary wall. This outlook is not considered to be out of character and will ensure an acceptable level of daylight provision to both units. The windows of the bedrooms for the two apartments, also at lower ground floor level, but in the southern portion of each building (units 1 and 1) will overlook a lightwell. There will be a distance of 2m between the windows of the bedrooms for units 1 and 1 and the wall forming part of the new extension to each building. Views across neighbouring areas of private outdoor amenity space will also be possible. Overall, these two bedrooms will be exposed to an acceptable level of daylight provision.
- 5.42 At first floor level, the rear extensions will be slightly smaller and will not extend to the northern boundary of the site. The northern face of each extension will not consist of windows and will stop 2.8m short of the boundary wall. From the second floor upwards, the rear elevation of each building will consist of windows as existing (apart from the new windows at fourth floor) facing northwards, towards the roof of the office / business units on Colonnade. There should be no concerns regarding overlooking in this respect.
- 5.43 In terms of appearance, scale and layout, the proposed extensions to the rear and roof of each building should be considered wholly acceptable. The materials proposed will be in-keeping with those found locally, thus respecting the character of the buildings and the surrounding heritage assets. The scale of extended development proposed is also commensurate with similar higher quality additions in the surrounding area.
- 5.44 Overall, the proposed development will provide high quality accommodation that is functional and adaptable. The apartments will comprise adequately sized accommodation, each with an efficient room layout and is acceptable in terms of outlook, privacy and daylight provision. The

proposed extensions are also acceptable in design terms. The proposed development is therefore in accordance with Policies H6 and D1 of the Camden Local Plan and Policy 3.5 of the London Plan.

LISTED BUILDING WORKS

- 5.45 As established in Section 2, Nos. 64 and 65 are Grade II Listed. This application for planning permission and listed building consent is therefore accompanied by a Heritage Statement prepared by KM Heritage.
- 5.46 As explained in the Heritage Statement, the buildings on site experienced considerable alteration and loss of historic detailing during the 20th century. They suffered bomb damage during the Second World War and many of their original architectural features have since been lost as a result of previous repair and refurbishment works undertaken with modern materials. The accompanying Statement identifies that there are no cornices or fireplaces within either building and the majority of the skirting and windows have been replaced.
- 5.47 The closet wing to the rear of each building is a non-original adhoc feature. In particular, the wing to the rear of No. 64 was added during the 19th century and on further inspection is in a poor structural state suffering from damp. The closet wing to the rear of No. 65 has also been entirely reconstructed within the last decade.
- 5.48 As a result of the alterations described above, the architectural value of the buildings are primarily limited to their external appearance, notably their front elevations. Internally, much of the historic fabric of the buildings have been removed apart from a few key features such as the staircases from basement to second floor level.
- 5.49 In terms of the proposals impact on the significance of the buildings, the scheme provides the opportunity to reinstate sympathetic and appropriate features such as skirting, cornices and doors. The reinstatement of such features as part of the application scheme will enhance the status of the buildings as originally intended, since they were built in the 18th century for residential purposes.
- 5.50 The proposed three-storey extensions to the rear of each building will consist of traditional materials and have been designed to reflect similar higher quality additions to the neighbouring properties in terms of scale and height. The proposed extensions will be located to the rear of the buildings in a secondary space of limited or no historic significance and will thus be appropriate in context. The extensions will enhance the overall functionality of the site, replacing the existing closet wings which are of a poor quality.
- 5.51 The proposed external restoration works will return the buildings to their original quality, thus enhancing their special interest. In particular, the traditional lime mortar of the buildings will be repointed where necessary and the non-original sliding sash windows at second and third floor level will be replaced with appropriately designed glazed units.

- 5.52 In policy terms, any “less than substantial harm” that can be ascribed to the scheme is outweighed by the benefit of the proposed repair and restoration works. These works will enhance and better reveal the significance of the listed buildings, whilst securing its optimum viable use for housing and providing it with a sustainable future. The buildings historic fabric and key original features, where they do remain, will be retained. The proposed development will also preserve and enhance the setting of the neighbouring heritage assets in the Bloomsbury Conservation Area.
- 5.53 Accordingly, the accompanying Heritage Statement concludes that the scheme is in accordance with Policy D2 of the Camden Local Plan and the NPPF.

6 CONCLUSIONS

- 6.1 Nos. 64 and 65 Guilford Street were redeveloped in the late 1990's to form a single hostel, designed to provide short-term accommodation for hotel workers in the Bloomsbury area. The hostel, in its current form, provides 32 bedrooms for ILH employees with shared facilities, such as kitchens and bathrooms, and communal areas.
- 6.2 Due to the demand that currently exists for higher quality staff accommodation, specifically from ILH staff, the applicant considers it necessary to reconfigure and extend Nos. 64 and 65 Guilford Street to provide modern and self-contained apartment accommodation for its employees.
- 6.3 The application therefore seeks full planning permission and listed building consent for the change of use of the buildings from a hostel (Sui Generis) to Use Class C3 (dwelling houses) providing:
- 9 x 1 bedroom apartments for staff accommodation for ILH workers at No. 64 and;
 - 9 x 1 bedroom apartments for staff accommodation for ILH workers and / or private rented accommodation at No. 65.
- 6.4 It is proposed that occupancy at No. 64 will be restricted to ILH workers by way of a planning condition. While No. 65 will also mainly be used as key worker accommodation for ILH staff, the applicant would like the flexibility to also let some of the apartments on a private rented basis.
- 6.5 To enable the development of the proposed apartments, the application also seeks full planning permission and listed building consent for the demolition of the closet wings on Nos. 64 and 65 and the construction of a three-storey rear extension to each building. An extension to the loft area of each building is also proposed, thus creating a new fourth floor, as well as internal alterations and external restoration works.
- 6.6 We have identified in Section 5 that Policy H5 of the Camden Local Plan and Policy 3.14 of the London Plan are of material relevance to the determination of the application. Both policies seek to resist the loss of existing affordable housing floorspace, extending the definition of affordable housing to include hostel and staff accommodation. Whilst the proposal will result in the loss of outdated hostel accommodation – in terms of bedroom numbers – it will not result in the loss of floorspace. The existing hostel floorspace will be reconfigured and extended to provide higher quality self-contained accommodation for ILH staff in each building, thus meeting contemporary demand. Policy H5 of the Camden Local Plan and Policy 3.14 of the London Plan are therefore complied with as well as the NPPF.
- 6.7 The proposed apartments at No. 65 will be occupied in full or in part as staff accommodation but may be let on the open market, when necessary. The 9 apartments proposed at No. 65 therefore trigger a requirement for an affordable housing contribution. Since the floorspace

provided in this building has the capacity for less than 10 residential units, the Council should accept a payment in lieu towards the provision of off-site affordable housing, in accordance with Policy H4 of the Camden Local Plan. The applicant is willing to engage in discussions with Planning Officers regarding the commuted sum payable, as calculated in Section 5.

- 6.8 In addition to land use policy matters, the proposed development will provide high quality residential accommodation that is functional and adaptable. The apartments will be adequately sized and each will have an efficient room layout which is acceptable in terms of outlook, privacy and daylight provision. The proposed development is therefore in accordance with Policy H6 of the Camden Local Plan and Policy 3.5 of the London Plan.
- 6.9 The internal and external works proposed to Nos. 64 and 65, including the demolition of the closet wings and the proposed extensions to each building, will have a relatively small effect on their overall heritage significance, noting the buildings status' as Grade II listed. Each extension will be built with materials akin to those found locally and are thus acceptable in design terms. Any harm that can be ascribed to the scheme is heavily outweighed by the benefit of the restoration works, which will better reveal the significance of the listed buildings, while securing its optimum viable use and providing it with a more sustainable future. The proposed development is therefore in accordance with Policies D1 and D2 of the Camden Local Plan and the NPPF.
- 6.10 Overall, the proposed development is an acceptable and appropriate form of development at the application site. The scheme complies with all relevant Development Plan policies. Our overall conclusion therefore is that the proposals should be treated favourably and planning permission and listed building consent should be granted.

APPENDIX I



NUMBERS 61 TO 66 AND ATTACHED RAILINGS

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: NUMBERS 61 TO 66 AND ATTACHED RAILINGS

List entry Number: 1245858

Location

NUMBERS 61 TO 66 AND ATTACHED RAILINGS, 61-66, GUILFORD STREET

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 08-Jun-1990

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 477962

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

CAMDEN

TQ3082SW GUILFORD STREET 798-1/95/720 Nos.61-66 (Consecutive) 08/06/90
and attached railings

GV II

War II. Welsh slate roof having brick ridge and end stacks. Double-depth plan. Nos 61-65: 4 storeys and basement, symmetrical 15-window range. Doorways; No.61 has C20 panelled door set in mid C19 semicircular arched stucco surround, Nos 62 & 63 have late C18 fielded 6-panelled doors set in similar surrounds with late C18 fluted and reeded architraves, Nos 64 & 65 have flat arches over late C19 panelled doors set in ground floor of channelled stucco. Gauged brick flat arches to tall 1st floor C20 casements and plate-glass sashes. Continuous stucco sill bands beneath 1st and 3rd floor windows. Plain stone coped parapet. Late C18 sashes with glazing bars to rear of Nos 64 & 65. INTERIORS: retain late C18 dog-leg staircases with stick balusters set on open strings with fret-cut brackets and wreathed mahogany handrails. Late C18 enriched and modillioned plaster cornices survive in most rooms; mid C19 marble fireplace in 1st floor room of No.61; Nos 64 & 65 also retain late C18 shutters and panelled doors set in moulded and reeded architraves. Late C18 fireplaces noted to survive in some rooms which could not be inspected. SUBSIDIARY FEATURES: attached wrought-iron railings with urn finials to front. No.66: 4 storeys and basement. 3 windows. Ground floor of channelled stucco. Flat arch to doorway with late C19 panelled door with overlight. Ground floor sashes with flat arches and late C19 plate-glass. Upper floors have gauged brick flat arches to late C19 4-pane plate-glass sashes; 3rd floor stucco sill band. Stone coped parapet. To rear, late C18 sashes. INTERIOR: not inspected but noted as having late C18/early C19 dog-leg staircase with turned balusters. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 32).

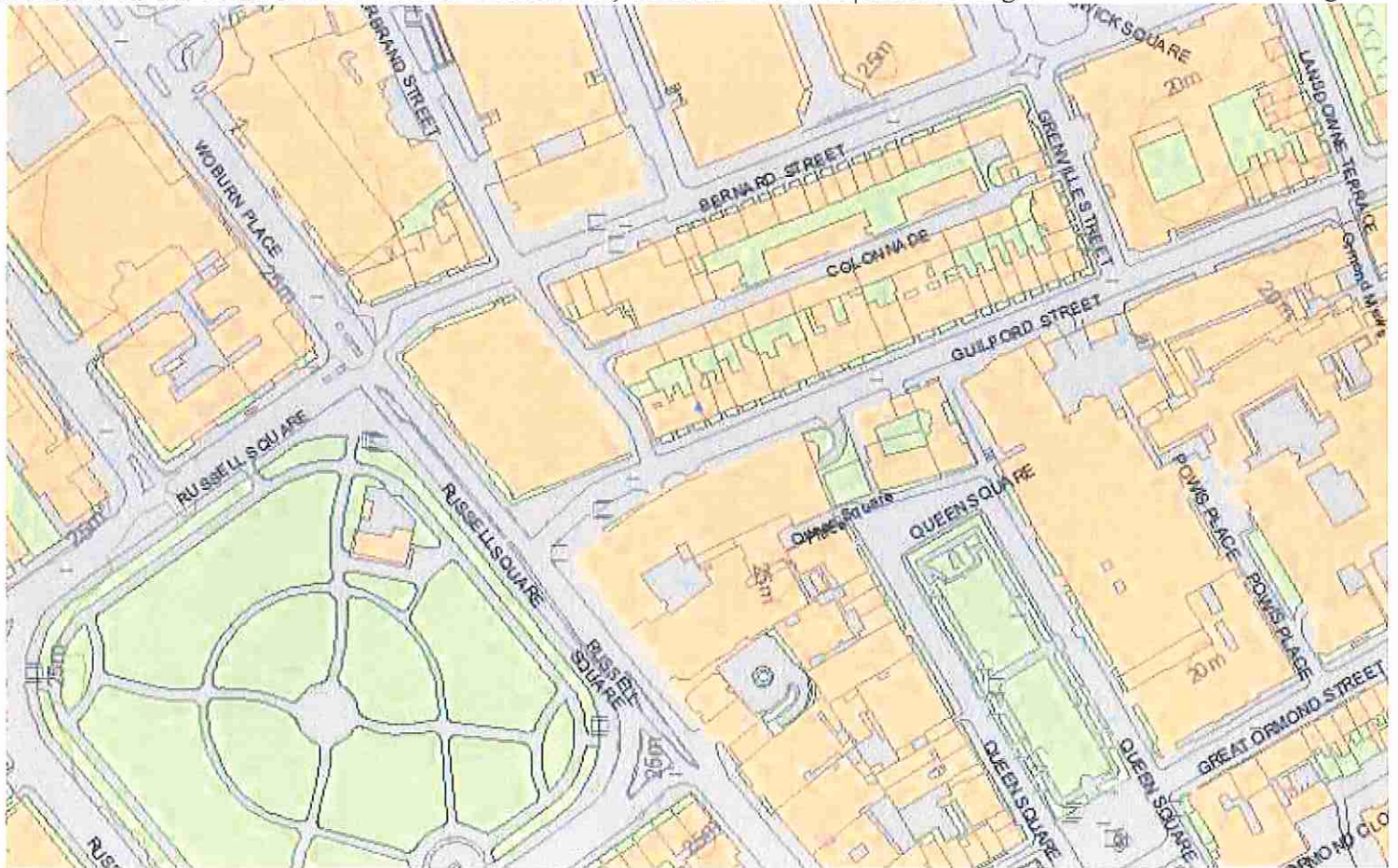
Listing NGR: TQ3024682083

Selected Sources

Books and journals

'Survey of London' in Survey of London - Kings Cross neighbourhood The Parish of St Pancras Part 4: Volume 24 , (1951), 32

National Grid Reference: TQ 30243 82080



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APPENDIX 2

