

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

SITE AT IMPERIAL HOTEL, 61-66 RUSSELL SQUARE, LONDON WC1B 5BB

PLANNING APPLICATION

BY

THE IMPERIAL LONDON HOTELS LIMITED

PLANNING STATEMENT

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1. INTRODUCTION

1.1 This Planning Statement forms part of the planning application by The Imperial London Hotels Limited (ILH) for the following proposed development at the Imperial Hotel, 61-66 Russell Square, London WC1B 5BB:-

- Removal of roof level plant on front wing; raising of roof of front wing with associated 9th floor elevation alterations;
- Construction of roof level hotel lounge & bar extension on front wing;
- Demolition of 10th floor plant room, and construction of 10th floor extension to rear wing to form double-height hotel restaurant on 9th & 10th floors;
- Construction of lift extension to north elevation of rear wing;
- Demolition of ground floor projection on front elevation, and installation of new shopfronts & pavement treatment to Russell Square frontage;
- Revised treatment to internal courtyard elevations & replacement hard landscaping;
- Replacement illuminated hotel signage to front & flank elevations.

1.2 It should be noted that the application site also includes the premises at 156 and 156A Southampton Row which are located at ground floor level below part of the hotel.

1.3 This statement should be read in conjunction with the following application documents:-

- The application drawing set prepared by the project Architects, Cube Design Limited (CDL);
- The Design & Access Statement prepared by CDL;

- The Heritage Statement prepared by Spurstone Heritage Limited;
- The Energy Assessment prepared by Method Consulting;
- The Sustainability Statement prepared by Method Consulting;
- The Transport Assessment prepared by Vectos;
- The Operational Management Plan prepared by Vectos;
- The draft Construction Management Plan (CMP) prepared by ILH; and
- The Statement of Community Involvement (SCI) prepared by Thorncliffe.

1.4 This statement is provided to assist Camden Council (“the LPA”) in its assessment of the planning merits of the application by reference to relevant planning policies and all other material planning considerations.

2. THE APPLICATION SITE AND SURROUNDING AREA

- 2.1 The Imperial Hotel is located on the east side of Russell Square, a short distance to the south of Guilford Street. The site includes a pedestrian and vehicular entrance from Russell Square, and a service access from Queen Square to the rear of the site. The main hotel entrance and drop-off point are located within an enclosed courtyard to the rear of the site entrance on Russell Square.
- 2.2 The original hotel building was designed by Charles Fitzroy Doll between 1905 and 1911, and was demolished in 1966. It was then replaced with the existing building of the same name to a design by C. Lovett Gill & Partners. The existing building has an asymmetrical 'T-plan' with a front wing facing Russell Square, and a slightly curved rear wing which is directed towards Queen Square. The hotel is 10 storeys in height comprising a ground floor level and 9 upper levels. An 11th storey accommodating plant is located largely above the rear wing. The hotel's main façades are faced in brick and concrete. The front elevation features horizontal concrete bands that are cranked to form angled window projections. The inner elevations are less articulated, and feature mainly brick finishes.
- 2.3 The Imperial Hotel incorporates 382 bedrooms along with restaurants, bars and meeting rooms. There are, in addition, various independent commercial uses at ground floor level on the Russell Square frontage including a car hire office, a shop and a bureau de change. The site also includes a sub-basement and a basement-level public car park which is accessed from the courtyard and exited via Guilford Street. The hotel adjoins, and is internally linked to, the President Hotel which is situated immediately to the north, and which is in the same ownership. A casino is located on the eastern side of the entrance courtyard but does not form part of the application site. The applicant company is a long-established, family-run business that owns a number of hotels in this part of London.
- 2.4 The application site falls within the Bloomsbury Conservation Area, and there are numerous listed buildings on and in the vicinity of Russell Square, and on Queen Square to the rear. The garden of Russell Square is listed Grade II on the Register of Historic Parks and Gardens. Full details of all heritage assets in the vicinity of the

application site are provided in the Heritage Statement.

- 2.5 The surrounding area includes a wide range of land-uses including ground floor commercial uses along Southampton Row, residential and office accommodation in and around Russell Square and Queen Square, and a number of institutional uses including the University of London.
- 2.6 The site is located within the Central Activities Zone (CAZ) but not within a designated frontage. It also falls within the background assessment area of Designated View 5 (Greenwich Park to Central London) identified in the Mayor's London Plan and London View Management Framework. Russell Square is designated as open space.
- 2.7 Additional information regarding the site's context is set out in the Design & Access Statement.

3. RELEVANT PLANNING HISTORY

3.1 The application site has an extensive planning history, the relevant elements of which are as follows:-

- Planning permission (ref: N14/2/1/1682) was granted on 28/02/1966 for the *'erection of a ten storey building to comprise a hotel with basement parking on the site of the Imperial Hotel, Russell Square, Camden'*;
- Planning permission (ref: 8400202) was granted on 03/10/1984 for the *'installation of a new retail unit in the covered approach to the hotel'*;
- Planning permission (8900035) was granted on 23/01/1989 for the *'refurbishment of ground floor façade to Russell Square of existing hotels'*;
- Planning permission (8900626) was granted on 30/11/1989 for the *'formation of new shop units to replace one existing including the installation of a new shop front'*;
- Planning permission (2003/0810/P) was granted on 02/07/2003 for the *change of use of Class A1 (retail unit) to retail floorspace and toilets/storage areas ancillary to existing hotel use (class C1) and alterations to shopfront including a new canopy'*;
- Planning permission (2004/1233/P) was refused on 08/04/2004 for the *'installation of new raised decked area to exterior of restaurant/bar including new canopy and glazed balustrade'*;
- Planning permission (2007/5581/P) was refused on 10/12/2007 for the *'retention of decked area with glazed balustrade enclosure under canopy at front ground floor area to hotel, plus elevational alterations to it, and erection of additional canopied enclosure on 2 bays to its left outside entrance'*;
- Planning permission (2012/2564/P) was granted on 31/05/2012 for the *'subdivision of existing retail unit (Class A1) and partial change of use to*

create a new hotel entrance (Class C1); associated shopfront alterations including new glass doors and screens and widening of columns'; and

- Planning permission (2013/7194/P) was granted on 22/11/2013 for *'alterations to shopfront and extension of existing decking area'*.

3.2 A number of other planning decisions have been made relating to the installation of plant and signage at the hotel but these are not considered to be relevant to the issues raised by the current application.

4. THE APPLICATION PROPOSALS

- 4.1 The Imperial Hotel is in need of refurbishment and modernisation after approximately 50 years of continuous use. This planning application proposes key elements of the overhaul and enhancement of the hotel, whilst other concurrent planning applications (as detailed below), along with internal up-grade works and external cleaning, will also form part of the overall scheme which, on completion, would raise the hotel to '4 star' standard.
- 4.2 The proposed up-grading of the accommodation, and the associated provision of improved ancillary facilities, would result in a small reduction in the number of bedrooms from 382 to 375, as explained in the Design & Access Statement.
- 4.3 The works proposed by this planning application fall broadly into three categories, namely (i) those concerned with alterations and enhancements at ground floor level including external ground treatments, (ii) changes to the main elevations, and (iii) roof-level alterations and additional accommodation at 9th and 10th floor levels. These elements are inter-linked, and in combination would deliver the external improvements and enhanced facilities which are required by ILH.
- 4.4 At ground floor level, new shop fronts to the Russell Square elevation are proposed. These works would include the full removal of the existing raised decking and projecting enclosure to the hotel's 'Night & Day Bar', and the installation of fully glazed and recessed shop fronts set between elegant vertical columns. Other works include new pavement treatment to the main frontage, and a new entrance and surface treatments within the courtyard.
- 4.5 The main elevations from 1st to 8th floor levels are to be cleaned and renovated. Proposed replacement windows to these floors are the subject of a separate, concurrent planning application. The inner (courtyard) elevations would be enhanced and re-detailed.
- 4.6 The principal components of this planning application would be undertaken at roof level on both wings. These works would comprise the demolition of top floor of the

rear wing, the removal of all existing plant including that contained within the top two floors of the rear wing, and the removal of the plant enclosure which extends along much of the length of the front wing. The existing telecoms aerials would also be removed. Following these works, the roof level of the 9th floor on the front wing would be raised by 0.5 metres, and the elevation of this floor would be set back and revised to include a slightly deeper parapet band. A largely glazed lounge and bar extension, featuring a 'folded' roof, would be constructed in a recessed position on the front wing. On the rear wing, a new lift extension would be constructed on the north elevation, and the top floor would be re-constructed to accommodate the hotel's main restaurant within a partially double-height space with revised elevational treatment. The two extensions would inter-connect at the junction of the wings, and the undeveloped sections of roof would provide external terraces for customer use. These new facilities, which would be open both to hotel guests and non-residents, would take advantage of the impressive views over central London which are offered from the roof of the hotel. ILH consider that new facilities at this level would significantly enhance the appeal of the hotel for both guests and non-resident users including local residents and businesses.

4.7 More comprehensive details of the proposals, the subject of this planning application, are provided in the Design & Access Statement.

4.8 In addition to this planning application, three other concurrent applications have been submitted to the LPA by CDL, on behalf of ILH, as follows:-

- Application 2019/2400/P for the '*replacement of existing windows to between second and eighth floor levels (inclusive) to all elevations and minor alterations to windows over the entrance area to hotel building (Use C1)*';
- Application 2019/2464/P for the '*removal of existing front structure (part); installation of metal grille at ground floor level and minor alterations to front elevation to Imperial Hotel (use C1) and relocation and replacement of flues to rear elevation of President Hotel (use C1)*'. This application relates to the external works required in connection with the installation of a new

basement electrical sub-station; and

- Application 2019/2766/NEW (awaiting validation) for the '*erection of three storey building to include plant room, 10x hotel rooms and link to President Hotel and the erection of a canopy following the removal of existing two storey building and canopy within service yard to hotel building (Use C1)*'.

5. PRE-APPLICATION ENGAGEMENT AND COMMUNITY INVOLVEMENT

5.1 The proposals, including earlier iterations, have been the subject of extensive pre-application consultation with the LPA since July 2016. Further information on this process is set out in the Design & Access Statement. The local community has also been engaged, and has provided supportive and constructive feedback. Details of pre-application engagement with the LPA and the local community are summarised below.

Pre-application engagement with the LPA

5.2 An initial pre-application submission was lodged with the LPA in July 2016, and this was followed by two meetings in August 2016. Following those meetings, a revised package was lodged in October 2016, and a further meeting was held with officers on 2nd February 2017. In summary, the oral feedback received from officers at these meetings was as follows:-

- The location of the site is sensitive given its prominent location within a historic environment;
- The existing building makes, at best, a neutral contribution to the character and appearance of the conservation area, and some elements detract from that character and appearance including the existing roof-level enclosures and plant, and the ground floor frontage projection; and
- The scheme proposes roof-level enlargement to a building which is higher than its immediate neighbours but the merits of these changes need to be assessed in the context of the full package of improvements to the building which are broadly welcome. Officers noted that a roof extension may be possible.

5.3 A revised pre-application proposal was submitted on 11th May 2018, and a meeting with officers took place on 18th July 2018. In summary, feedback from the LPA dated 26th September 2018 stated as follows:-

- The refurbishment of the hotel accommodation, notwithstanding a loss of hotel bedrooms, would support the tourism economy in Camden and central London while not resulting in any loss of permanent residential accommodation or placing strain on local amenity, services or transport;
- The Council would normally require, under Policy H2 of the Local Plan, a contribution towards the supply of housing on schemes where more than 200 sqm (gross) additional accommodation is provided;
- The revised proposal represents a significant improvement in design terms, and provides some basis for extending the building at roof level. However, further work is required on the form, bulk and detailed design of the scheme;
- The applicant is encouraged to enter into a Planning Performance Agreement (PPA) in order to develop the proposals into a fully acceptable scheme;
- The proposed works to the ground floor elevations, including the removal of the raised decking along the highway, are welcome.

5.4 A PPA was entered into between the LPA and the applicants on 5th November 2018. The scope of the PPA related to the completion of the planning stage including further pre-application engagement and the subsequent submission and determination of the planning application.

5.5 Under the PPA, three pre-application meetings were held on 14th November 2018, 14th December 2018 and 8th February 2019 at which further amendments and refinements to the emerging scheme were discussed. Written feedback was provided by officers on 7th January and 22nd February 2019. In summary, the feedback from the LPA following the final pre-application meeting under the PPA advised as follows:-

- The applicant would need to provide a detailed justification for the omission of housing from the scheme, having regard to the detailed application of

the criteria under Local Plan Policy H2;

- The proposal has progressed significantly in design terms, and has responded to the Council's comments throughout the pre-application discussions. The detailed design of the revised 9th floor and the roof level extension takes its cues from the host building, including in its use of concrete and the folded roof lines which draw on the angled treatment of existing front elevation. The scheme is now considered to be at an acceptable stage to take forward to a planning application. The applicants are encouraged to engage in the Design Review process;
- A series of Planning Obligations are likely to be sought by the LPA through a s.106 agreement. These would include a Construction Management Plan, a Highways Contribution for any remedial work required to the highway following construction, and a Training & Employment Contribution aimed at securing employment opportunities for local people in the construction and use of the proposed development.

Community Involvement

- 5.6 The application is accompanied by a detailed SCI which details the stages of public engagement including the public exhibition, relating to the proposals which are the subject of this planning application, which was held on 28th and 30th March 2019. The SCI sets out the extent of consultation carried out with local residents, businesses, institutions and amenity groups, and indicates the overwhelmingly positive feedback received.

6. PLANNING POLICY CONTEXT

The National Planning Policy Framework (NPPF) (Revised February 2019)

- 6.1 The revised NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development which is defined to comprise economic, social and environmental dimensions. The planning system should help build a strong, responsive and competitive economy, and should contribute to protecting and enhancing the built and historic environment. This should include making effective use of land, and mitigating and adapting to climate change (Section 2).
- 6.2 Local planning authorities should approach decisions on proposed development in a positive and creative way, and should seek to approve applications for sustainable development where possible. Early and good quality pre-application engagement has significant potential to improve outcomes (Section 4).
- 6.3 Planning decisions should help create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity. Planning policies and decisions should recognise and address the specific locational requirements of different sectors (Section 6).
- 6.4 Development should be focused in locations which reduce the need to travel, and which offer a choice of sustainable transport modes. Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Section 9).
- 6.5 Planning decisions should promote an effective use of land while safeguarding and improving the environment. Decisions should promote and support the development of under-utilised land and buildings (Section 11).
- 6.6 Good design is a key aspect of sustainable development, and planning decisions

should ensure that developments function well, are visually attractive, are sympathetic to local character and history whilst not preventing innovation or change, and optimise the potential of the site whilst providing a high standard of amenity. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussions between the applicants, the LPA and local community about the design and style of emerging schemes is important in clarifying expectations and reconciling local and commercial interests (Section 12).

- 6.7 The planning system should support the transition to a low carbon future, and new development should help to reduce greenhouse gas emissions by increasing the use and supply of renewable and low carbon energy and heat (Section 14).
- 6.8 In determining applications, LPAs 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. When considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset including its setting, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use (Section 16).

The statutory development plan

- 6.9 The statutory development plan for the area comprises the consolidated London Plan 2016 (incorporating alterations since 2011), and the Camden Local Plan which was adopted in June 2017. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications and appeals to be determined in accordance with the development plan unless material considerations indicate otherwise.

The London Plan

6.10 The following policies of the London Plan, as summarised, are considered to be relevant to the issues raised by this application:-

- Policy 4.5 states that the Mayor will support London's visitor economy and stimulate its growth, including provision for business visitors in and around the Central Activities Zone (CAZ). Strategically important hotel capacity should not be lost;
- Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy which requires developments to be 'lean', 'clean' and 'green';
- Policy 5.3 states that the highest standards of sustainable design and construction should be achieved to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime;
- Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed within a Transport Assessment. The construction and servicing of development should minimise reliance on motor vehicles, and should not adversely affect safety on the transport network;
- Policy 7.4 states that development should have regard to the form, function and structure of an area, place or street, and the scale, mass and orientation of buildings. Design should be a high quality and human scale that has regard to existing context;
- Policy 7.6 states that new development should be of the highest architectural quality which enhances the public realm and comprises details and materials that complement but not necessarily replicate local character. Amenity should be protected, and schemes should optimise the potential of sites;

- Policy 7.8 states that new development should identify and conserve heritage assets and their settings;
- Policy 7.11 states that the Mayor will assess new development for its impact on designated strategic views. Table 1 lists Designated Views including London Panorama View 5 (Greenwich Park to Central London); and
- Policy 7.12 states development proposals in the background of a designated view should give context to landmarks and not harm the composition of the view as a whole. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a landmark should take into account the effects of distance and atmospheric or seasonal changes.

The Camden Local Plan

6.11 The following policies of the adopted Local Plan, as summarised, are considered to be relevant to the issues raised by this planning application:-

- Policy G1 states that the Council will deliver growth by high quality development and promoting the most efficient use of land and buildings having regard the all aspects of sustainability including accessibility, amenity and heritage, and expecting the provision of a mix of uses, including self-contained housing, where appropriate. The application site falls within the Holborn Growth Area;
- Policy H2 states that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area, where a development involves additional floor space of more than 200 sqm (GIA), the Council will require 50% of all additional floor space to be self-contained housing subject to (a) the character of the development, site and area, (b) site size, and any constraints on developing the site for a mix of uses, (c) [not relevant], (d)

whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses, and (e) [not relevant];

- Policy E1 states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The Council will support businesses of all sizes including tourism;
- Policy E3 states that the importance of the visitor economy in Camden is recognised, and the Council will support new visitor accommodation in central London. New tourism development must be easily reached by public transport, and should not harm local character or residential amenity;
- Policy A1 states that the quality of life of occupiers and neighbours will be protected by minimising impact of residential amenities in respect of various factors including privacy, outlook, daylight, sunlight, artificial light, noise, and fumes. Impacts of the construction phase will be mitigated by the use of Construction Management Plans;
- Policy A2 states that the Council will resist development which is detrimental to the setting of a designated open space;
- Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed;
- Policy D1 states that high quality inclusive design is required which respects local context, preserves or enhances heritage assets, is of sustainable construction which uses high quality complementary materials, and preserves strategic and local views;
- Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings, including conservation areas, listed buildings, historic parks and gardens, and locally listed heritage assets;

- Policy D3 states that new and altered shopfronts should be of a high standard of design, having regard to, inter alia, the relationship between the shopfront and the upper floors of the building;
- Policy CC1 states that new development will be required 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. All new development should reduce carbon dioxide emissions through following the steps in the energy hierarchy. Sensitive energy efficiency improvements to existing buildings will be encouraged. All applications for developments of more than 500 sqm of gross internal floor space should be accompanied by an Energy Statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction;
- Policy CC2 states that the Council will require development to be resilient to climate change by adopting appropriate climate change adaptation measures. The Council will also promote and measure sustainable design and construction by expecting non-residential developments of 500 sqm of floor space or above to achieve 'excellent' in BREEAM Assessments, and encouraging zero carbon in developments from 2019;
- Policy CC3 states that the Council will seek to ensure that development does not increase flood risk, and reduces the risk of flooding where possible. Development should incorporate water efficiency measures;
- Policy CC4 states that the Council will ensure that the impact of development on air quality is mitigated, and that exposure to poor air quality is reduced;
- Policy CC5 states that the Council will seek to make Camden a low waste borough;

- Policy T1 states that sustainable transport will be prioritised by encouraging walking, cycling and public transport;
- Policy T2 states that the Council will limit the availability of parking and require all new developments to be car-free;
- Policy T4 states that the Council will promote the sustainable movement of goods and materials, including during the construction phase of developments; and
- Policy DM1 states that the Council will use planning contributions, where appropriate, to support sustainable development and to mitigate the impact of development.

Planning Guidance

- 6.12 The Mayor's London View Management Framework SPG (LVMF) was adopted in March 2012, and provides the basis for analysing the impact of proposed development on a Designated View. A planning application for a proposal that could affect a designated view should be accompanied by an analysis that explains, evaluates and justifies any visual impact on the view. The analysis, which will demonstrate that the proposal is consistent with the relevant London Plan policies, is a three- part process comprising scoping, description of the view, and description of the proposal and its impact on the view.
- 6.13 Camden Planning Guidance (CPG) has been issued on a number of topics including Design, Developer Contributions, and Energy Efficiency & Adaptation.
- 6.14 The Design CPG (March 2019) provides detailed design guidance in support and clarification of Local Plan Policies D1 and D2. The guidance states that high quality design makes a significant contribution to the success of a development. The impact of development on designated and non-designated heritage assets will be carefully assessed having regard to the principles set out in the NPPF.
- 6.15 Roof extensions are likely to be acceptable where good quality materials and

details are used and the visual prominence, scale and bulk would be appropriate having regard to the local context, and where they are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form. They are unlikely to be acceptable in various circumstances such as where there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene, or where buildings which have a roofline that is exposed to important London-wide and local views from public spaces.

- 6.16 Shopfronts should respect the design, character and proportions of the building within which they are situated and respect the character of the street, and should always be considered as part of a unified design of the whole building and should respect the character of adjacent properties.
- 6.17 The Developer Contributions CPG (March 2019) provides guidance on the general principles applied by the Council to planning obligations and related issues.
- 6.18 The Energy Efficiency & Adaptation CPG (March 2019) provides detailed guidance on the application of Local Plan Policies CC1 and CC2.

***Bloomsbury Conservation Area Appraisal & Management Strategy
(BCAAMS)***

- 6.19 The BCAAMS, which was published in 2011, describes the sensitive heritage context of Russell Square (a Grade II Registered Park & Garden) including a number of statutory listed buildings facing and in the vicinity of the square. It identifies the Imperial Hotel as a neutral contributor to the character and appearance of the conservation area. Further details are provided in the Heritage Statement.

7. PLANNING CONSIDERATIONS

Principle of Development

- 7.1 The hotel occupies a highly accessible location within the CAZ and the defined Holborn Growth Area, and close to most of central London's internationally renowned tourist attractions. The enhancement of the tourist accommodation 'offer' in this location is key to retaining London's status as a top international tourist destination.
- 7.2 The application scheme, and the related programme of internal refurbishment and up-grading which is to be undertaken by the ILH, would deliver significant improvements to the Imperial Hotel in terms of the standard of bedrooms and quality of ancillary accommodation. Notwithstanding the small reduction in the number of bedrooms, these improvements are fully supportable in the context of London Plan Policy 4.5 and Camden Local Plan Policies G1, E1 and E3.
- 7.3 At pre-application stage, officers confirmed that the proposed up-grading of the hotel would support the tourism economy in Camden and central London more generally, and was therefore acceptable in land-use terms.
- 7.4 The application scheme retains the existing mix of independent (i.e. non-ancillary) retail and service uses at ground floor level on the Russell Square frontage, along with the public car park at basement level.

Mixed Use Local Plan Policy H2

- 7.5 Policy H2 seeks the provision of self-contained dwellings as part of a mix of uses in Central London Area schemes (and other specified locations) which otherwise propose an increase of more than 200 sqm of floor space in new or extended non-residential development. The policy, which applies to all non-residential uses including hotels, requires 50% of all additional floor space to be self-contained housing. Supporting paragraph 3.51 states that '*....rather than being used as ancillary space by non-residential occupiers, the homes should be independent of*

other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use'.

7.6 Given that the proposal delivers more than 200sqm of additional floor space in the Central London Area, it is necessary to assess this application against Policy H2. The application schemes proposed a net increase in floor space of approximately 345 square metres, and the policy would therefore potentially require the provision of approximately 175 square metres of residential floor space.

7.7 The policy wording makes it clear that a mix of uses may not be sought in all circumstances where the policy applies, and such provision is subject to the application of policy criteria. Specifically, criteria (a) to (e) provide the basis for assessing whether or not any form of housing provision (whether on-site, off-site or as a payment-on-lieu) would be required in a particular case. Criteria (c), relating to schemes in the Hatton Garden Area, and (e) concerning development which is publicly-funded or serving a public purpose, are self-evidently not applicable to this proposal.

7.8 For the reasons set out below, it is the applicant's view that, having regard to the considerations arising under remaining criteria (a), (b) and (d) of Policy H2, new housing should not need to be provided as part of this proposal, whether on-site, off-site or in the form of a payment-in-lieu. Under criteria (a), (b) and (d) of Policy H2, the following considerations are taken into account:-

- a) *The character of the development, the site and the area*
- b) *Site size, and any constraints on developing the site for a mix of uses*
- d) *Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses.*

7.9 Before assessing specific locations within the application site which might be considered for residential development, the following general observations are put forward about the wider locality and the application site.

7.10 It is acknowledged that the broad character of the area surrounding the Imperial
CWA.1321.The Imperial Hotel.Planning Statement.June 2019

Hotel would not be incompatible with new residential development at the application site. There are other residential buildings on and around Russell Square and Queen Square. Furthermore, residential and hotel uses are not intrinsically incompatible in land-use terms, and the potential for these uses to co-exist satisfactorily is recognised at paragraph 3.41 of the Local Plan. That said, it is self-evident that not all existing hotel sites will be able to accommodate residential use in a satisfactory manner having regard to the characteristics and constraints of the site in question.

- 7.11 The site of the Imperial Hotel is intensively used in terms of the scale of the building, the number of bedrooms, the frequent comings and goings of guests and other visitors to the hotel, and the servicing activities associated with the use. The site also accommodates other established uses including retail and service outlets, and a large public car park in the basement. Adjacent buildings enclose the site to the north, east and south, and represent a further constraint on the site's potential to satisfactorily incorporate residential use. Dwellings would need to be adequately insulated from noise and all forms of disturbance which inevitably arise from a large hotel operation that is open 24 hours a day, in particular into the late evening period. Residential units would also require independent access as well as suitable and separate arrangements for the storage and collection of refuse and recycling.
- 7.12 For the purposes of assessing the scheme against these policy criteria, ILH have sought to identify those parts of the application site which might be able to accommodate a residential use. In this regard, it should be noted that the only areas of the site which are not covered by the extensive footprint of the main hotel building are the entrance courtyard and parts of the rear service yard. The following potential locations for residential use within the application site have been identified and are assessed in this statement:-

1. The hotel entrance courtyard including the airspace above the courtyard;
2. The hotel's service yard located on the northern side of the main rear wing;
3. Existing hotel accommodation at first and second floor at the eastern end of the rear wing close to the Queen Square service entrance; and
4. Any part of the roof.

- 7.13 Potential locations 1, 2 and 3 are identified on drawings 1289-P1106-A and 1289-P1107-A which are appended to this statement as Document 1.
- 7.14 Following on from the above general analysis of the site's characteristics, each of the identified potential locations for residential use is assessed below in detail against Policy H2 criteria (a), (b) and (d).

Potential Residential Location 1 - The entrance courtyard

- 7.15 The entrance courtyard is, to varying degrees, enclosed on all sides by adjacent and nearby buildings. Residential accommodation in this location would suffer from poor levels of outlook, daylight and sunlight, and there would be a high risk of direct overlooking from adjacent bedrooms and other hotel uses. Any balcony or roof terrace serving the residential block would be directly overlooked by the hotel accommodation. Residential occupiers would also experience noise and fumes from the vehicles accessing the hotel drop-off zone and the basement public car park. It would not be possible to provide direct access from the street to the residential units, rather access for residents would take place via the hotel's vehicular entrance and courtyard.
- 7.16 The hotel could self-evidently not function if the entrance courtyard was developed at ground level because this would obstruct access by guests including off-street drop-offs and collections. It would also prevent access to the existing public car park, the entrance to which is located in the south-eastern corner of the courtyard. A new building raised above courtyard ground level, and therefore maintaining vehicle access below, would block the outlook from the hotel bedrooms and other facilities which face the courtyard.

Potential Residential Location 2 – The service yard

- 7.17 A residential building located within the service yard would experience very poor standards of amenity in terms of daylight, sunlight, outlook, noise and fumes. Acoustic conditions in this location, due to the proximity of plant and service traffic, would not be acceptable for residential occupiers. Overlooking from adjacent hotel

rooms would also be likely to arise, and it would not be possible to provide outdoor amenity space of an acceptable standard. Furthermore, no part of this area fronts a public highway, and access to the residential accommodation would therefore need to be provided via the service entrance from Queen Square or through the hotel's existing internal public corridors and spaces. Neither of these options would meet the independent access requirements under Policy H2, and access via the rear service entrance would result in safety issues.

- 7.18 A residential building located within the service yard would also inhibit or prevent satisfactory service access for the hotel, and would be likely to result in complaints from residents to the Council's Environmental Health Team against the levels of noise and disturbance which inevitably arise from the operation of plant, the movement and unloading of commercial vehicles, and general noise in locations of this kind. Such complaints would be likely to constrain the hotel's legitimate servicing and other activities because the Council would have a legal duty to act under its environmental protection functions.

Potential Residential Location 3 – Existing hotel accommodation in the rear wing

- 7.19 This location has been chosen, for the purpose of this analysis, as it is situated close to the existing site entrance from Queen Square. The residential amenity and access issues, along with the operational conflicts raised in respect of Location 2 would apply with equal force to this location.
- 7.20 The change of use of the existing accommodation would result in a loss of bedrooms or other facilities, and a corresponding loss of revenue for the hotel. ILH could simply not contemplate this approach, in particular in the context of the substantial investment which it is intending to make in the up-grading of the hotel and its ancillary facilities. The proposals for the hotel make full use of the accommodation with no available surplus space. A requirement to relinquish existing hotel floor space, so that residential accommodation could be provided, would be counter-productive and would undermine the commercial objectives which underpin this planning application. The same principles and concerns would arise from the need to convert any other part of the hotel's existing floor space to

residential use. Depending on the part of the hotel selected, residential conversion would result in the loss of bedrooms, meeting rooms, restaurant and bar areas, kitchens, staff facilities, circulation spaces, plant or storage areas.

Potential Residential Location 4 – The roof

- 7.21 The principal component of the proposed development, the subject of this planning application, is the construction of a roof level extension to the hotel to provide new bar and restaurant facilities. If residential accommodation was introduced at roof level, occupiers would inevitably experience noise and other forms of disturbance from the adjacent lounge, bar and restaurant. Dwellings would also be 'stacked' directly above hotel rooms and/or meeting rooms. Access to any roof level residential units would either be provided via the hotel's existing stairs and lift, which would be unacceptable in operational terms and would conflict with the policy objective of independent access, or would need to be achieved through the introduction of a separate stair/lift core from street level. The latter would require the re-allocation of an existing stair and lift core from hotel to residential use. This would inhibit fire safety and evacuation arrangements for hotel users, and be wholly impracticable.
- 7.22 The incorporation of residential units at roof level would also not be feasible because it could not be achieved without adding substantially to the size of the extensions proposed by this planning application. The additional bulk, whether expressed as increased coverage of the roof or additional height of the extension (or both), would be unacceptable in visual amenity and heritage terms. The size, recessed location and detailed design of the proposed extension have emerged from extensive analysis of heritage and other design constraints, and have been the subject of protracted pre-application negotiations.
- 7.23 In the alternative, if the bulk and location of the proposed roof level extension remained as currently proposed, the requirement to include a residential element within this 'envelope' and in place of hotel facilities, would be self-defeating and illogical, and would undermine the commercial purpose of the scheme which is to provide high quality ancillary lounge, bar and restaurant accommodation for the

hotel at roof level. Put simply, there would be insufficient space to provide both the required new hotel facilities along with residential accommodation which amounted to 50% of the floor area of those facilities.

Policy H2 Conclusion

- 7.24 Residential use of any part of the application site, including the 4 specific locations identified, would therefore give rise to insurmountable operational and amenity conflicts with the established and extended hotel. The juxtaposition of hotel and residential uses would result in unacceptable operational constraints for ILH, and in wholly unsatisfactory levels of amenity and standards of access for prospective residents. For the above reasons, it is considered that residential accommodation cannot be satisfactorily incorporated into the proposed development, and such provision is therefore not required in this instance having regard to criteria (a), (b) and (d) of Local Plan Policy H2.

Impact on Residential Amenity

- 7.25 The application scheme would not materially intensify the use of this large hotel. The main focus of the use, in terms of external activity including guest arrivals and departures, would remain on the Russell Square frontage and within the hotel's entrance courtyard. Both of these locations are well separated from the closest residential accommodation.
- 7.26 Given the separation distances, limited additional bulk, and orientation, the proposed alterations and the roof level extensions would not materially impact the levels of daylight, sunlight, outlook and privacy experienced by occupiers of residential accommodation in Queen Square. Similarly, the proposed roof level terrace would be located well away from residential properties (both in terms of elevation and horizontal distance), and any noise generated by its use would not be a source of nuisance. These issues are considered in more detail in the Design & Access Statement.
- 7.27 For these reasons, it is considered that the proposals would not harm the living

conditions of any local residents, and no conflict is considered to arise with Local Plan Policies A1 and A4. Construction impacts would be mitigated by the implementation of and adherence to a CMP, a draft version of which accompanies the planning application.

Heritage & Design considerations

7.28 The Imperial Hotel is not listed but lies within the Bloomsbury Conservation Area. It forms part of the setting of the Grade II* listed Hotel Russell and several other buildings that are listed at Grade II, including most of the buildings that front onto Russell Square. Russell Square Gardens is listed at Grade II on the Register of Historic Parks and Gardens. The listed buildings, conservation area and registered garden are designated heritage assets.

7.29 The application is accompanied by a detailed Heritage Statement, the key findings of which are summarised below:-

- The hotel stands within a sensitive historic context including several listed buildings facing Russell Square and others on nearby streets. The listed buildings, conservation area and registered garden are designated heritage assets. Most of the buildings on the east side of Southampton Row, immediately south of the site, are locally designated as positive contributors to the conservation area. The wider historic context can be appreciated in views within, through and without the conservation area. The site is also within the Wider Setting Consultation Area of London View Management Framework (Panorama View 5A: Greenwich Park to Central London; Protected Vista from Assessment Point 5A.2 to St Paul's Cathedral);
- The BCAAMS identifies the hotel as a neutral contributor to the character and appearance of the conservation area, and states that it is one of a group of buildings that over time '*have mellowed to the eye and arguably have become an established part of the townscape*'. Therefore, the Imperial Hotel is assessed as having neutral significance as a building in its own right, and as making a neutral contribution to the conservation area,

while it detracts from the setting of the other designated heritage assets. Decorative elements from the earlier hotel on this site have been retained and reused in the entrance courtyard. A plaque on the front elevation commemorates the former home of Sir Thomas Lawrence on the site. These have historical value, and moderate significance. Other individual elements, including the ground floor extension of the front wing, rooftop plant room, flues, aerials and railings, and the dirty condition of the external elevations, detract from the character and appearance of the conservation area and the setting of the listed buildings and garden;

- The design of the proposals takes into account advice received from the LPA as part of an extensive pre-application consultation process. The removal of the existing ground floor extension and providing a new retail frontage would improve the appearance of the building at street level, return the full width of the pavement to public use and reanimate this stretch of the east side of Russell Square. Pedestrians would have more space to appreciate the significance of the heritage assets, particularly Russell Square Gardens and the Lawrence plaque;
- The proposed improvements to the courtyard would make a more inviting entrance, enhancing public access to and appreciation of the significant weathervane, set of bells, and statues that were salvaged from the Edwardian hotel and reused in the landscaping of the courtyard. Cleaning and repairing the exterior elevations would brighten and improve the backdrop to Russell Square Garden. These works would enhance the character and appearance of the conservation area and the setting of neighbouring heritage assets. The street-level changes would provide substantial heritage benefits;
- The proposed changes to the elevations are sympathetic to the existing architecture in scale, articulation, rhythm, materials and finishes. The new lift shaft replaces an unsightly external flue. It would not extend above the new 10th floor frieze, and is visually linked to the host building by the use of matching materials;

- The existing roof has a plant room, flues, aerials and railings that clutter the roofline and detract from the appearance of the conservation area. When the trees are bare, this fragmented and degraded roofline is the only part of the eastern backdrop to the registered garden visible from within the square. The proposed extension would replace it with an elegant, lightweight design that would improve the appearance of the roof and be a harmonious addition to the existing building. These changes would not only improve the appearance of the Imperial Hotel, but would also enhance the appearance of the conservation area and the setting of the neighbouring heritage assets;
- The proposed new restaurant, bar and terrace would be open to the public as well as hotel guests, and would provide new vantage points from which to view and appreciate the Bloomsbury Conservation Area and the wider historic environment;
- The street-level improvements would greatly enhance the character and appearance of the conservation area. By improving the appearance of the Imperial Hotel and decluttering its roofline, the proposed high-level alterations would improve the appearance of the building and, consequently, the setting of the neighbouring heritage assets. They would have a minimal impact on views within the conservation area, including the complex and dramatic roofline of the Grade II*-listed Russell Hotel. By improving public access to and appreciation of the conservation area and other designated heritage assets in the surrounding area, the proposals would better reveal their significance; and
- In all but one respect, the scheme's impact on heritage assets would be beneficial or neutral. One will cause less than substantial harm to the setting of the Hotel Russell. On balance, this is justified by the public benefits provided by the scheme. The proposals therefore satisfy the requirements of the NPPF and local policies for the protection of the historic environment.

7.30 The Design & Access Statement provides a detailed analysis of the design

CWA.1321.The Imperial Hotel.Planning Statement.June 2019

rationale which underpins the proposals along with an assessment of their impact on context, including on the Designated View and important local views. In summary, the Design & Access Statement concludes as follows:-

- The design of the lounge and bar extension has been very carefully considered in terms of the architectural quality and historical analysis of the building. The proposed extension would be an elegant structure, emphasising the concrete detailing of the building supporting a very simple and dramatic folded plate roof structure in concrete. The folded plate accentuates, in three-dimensional form, the plan form of the existing bays on the front of the building. The design picks up on these angles, and the flat vertical panel to the bays and the simplicity of the forms on the western façade. Below the folded plate, the enclosing walls would be glazed throughout, enabling the structure to be viewed as a lightweight form from a distance, and preserving the integrity and the simplicity of the “Y” shape for the roof. The materials would be high quality, respectful of the existing concrete façade and its articulation and mosaic detailing. This design for the roof top extension has evolved following a very detailed and sensitive study of the proportions, rhythm, style and dynamics of the existing façade;
- The impact of the additional height would be mitigated by setting back the extension on the front wing to the line of the existing plant room. This means that it would not be visible from most ground-level viewpoints in the eastern half of Russell Square. The visually lightweight design and materials, including a frameless glass balustrade to the terrace, would ensure that in longer views the Russell Hotel retains its dominant architectural presence in the sequence of buildings along this edge of the square. The proposals have been assessed in terms of the impact on five Key Views (A to E), as identified at pre-application stage. In all cases, the impact has been assessed to be acceptable;
- The proposed 9th floor revised elevational treatment would be a sympathetic response to the existing architecture. The elevation would have a deeper textured concrete ‘frieze’ framing the top of the building with a robust edge that answers the horizontal emphasis of the first floor. The

frame created by the corner brick piers would be extended upwards, and the proposed fenestration would echo the rhythm and splayed arrangement of the windows below. The height of the 'frieze' would define the top edge of the elevation, and the general character of the architecture would be maintained. The façade treatment has been designed to be in keeping with the existing treatment in terms of its articulated façade, triangular bays, and 'feature' concrete panels with inset mosaics. A small balcony would be formed, and 'feature' columns would be clad in line with the column detail at ground floor so as to retain a simple and stylish architectural language;

- On the north elevation, an external lift shaft would be added close to the existing flue. The lift would link the ground and ninth floors. The lift extension would be clad in stock brick to blend visually with the host building, and the lift overrun at level 10 would be enclosed within the same textured concrete with gold mosaic insets that run around the rest of the building. These changes would improve views of and from Queen's Square, which would compensate for the increase in height of 2.3m on the rear wing;
- The proposed cleaning of the façade would restore its original quality. Within the courtyard elevation, adjustments would be made to the façade treatment to increase the height of the windows to create picture windows to the courtyard. Mesh feature balconies would be incorporated to replicate the angular, triangular shape of the main bays. Verticality would be retained as part of the elevational treatment. The rear wing would be remodelled. The floor plate would remain, and the external wall treatment would be altered to provide an extensively glazed façade looking into the courtyard;
- The existing ground-floor projection on the front elevation disrupts the building line and reduces the space available to pedestrians. Its temporary character, utilitarian design and poor-quality materials are alien to the host building and have no relationship to the historic context. The projection detracts from the setting of the listed buildings and garden, and detract from the character and appearance of the conservation area. The new

shopfronts would be of elegant design with angled metal frames that echo the splayed arrangement of the windows above. These proposals would activate the street frontage and open up the hotel to the square to create a more positive, generous and welcoming relationship with the public realm;

- Within the courtyard, there would be improvements to the existing hard landscaping, street furniture and facades. The historic statues and features adjacent to the car park would be retained but the fascias would be replaced with a matching feature colonnade in keeping with the upper levels of the building. A new entrance canopy would be provided to signify the entrance to the Imperial Hotel; and
- The proposals would not impact the designated view from Greenwich. Utilising the LVMF model, the Imperial Hotel is blocked by New Street Square which is an 18-storey development. The scale and form of the New Street Square development is so significant that it fully obstructs any view of the proposed roof top extension from the Greenwich viewing points.

7.31 For the above reasons, the proposals are to preserve and enhance the character and appearance of the host building and this part of the Bloomsbury Conservation Area, and to protect the setting of listed buildings in the vicinity of the application site, and therefore to be in compliance with London Plan Policies 7.4, 7.6, 7.8, 7.11 and 7.12, and Camden Local Plan Policies A2, D1, D2 and D3, and guidance contained within CPG (Design) and the BCAAMS.

Transport & Highway Considerations

7.32 The application is accompanied by a Transport Assessment which concludes that the proposal can be accommodated without detriment to the operation of the local highway network. This is because:-

- The application site occupies a highly accessible central London location (PTAL 6B) with a number of underground stations and bus routes in close proximity. The site is also well served by cycling facilities and pedestrian routes. It is therefore anticipated that the great majority of hotel guests,

non-resident customers and staff would use sustainable travel modes;

- The proposal would not increase the number of hotel rooms, and would not materially change the existing access, parking and servicing facilities at the hotel. In line with planning policy, no additional on-site parking would be required or provided. The application is accompanied by an Operational Management Plan; and
- The proposal would not result in any significant change in vehicle or person trips because (i) no increase in the number of bedrooms is proposed, (ii) the relocated bar and restaurant would be of similar size to the existing and would remain open to non-residents, and (iii) the number of meeting rooms is unlikely to change. The relatively small increase in staff numbers is also unlikely to result in any material increase in overall trips.

7.33 In view of the above analysis, it is considered that the application proposal would comply with London Plan Policy 6.3 and Camden Local Plan Policies T1, T2 and T3.

Sustainability Considerations

7.34 The application site constitutes previously developed land occupying a highly accessible central London location. The application scheme proposes the sensitive extension and visual enhancement of the existing 1960s building in order to make full and effective use of the site in line with national policy expectations. The overall package of proposals, comprising this and the other concurrent planning applications, would deliver a wide range of sustainability benefits through the refurbishment and up-grading of accommodation, and the enhanced environmental performance of the building.

7.35 The application is accompanied by an Energy Assessment and a Sustainability Statement. These documents indicate that the proposals address policy requirements as follows:-

- The development would incorporate photovoltaic panels which would make maximum use of the available roof area. The array of panels would achieve a 8.2% reduction in regulated CO2 emissions which is below the requirement of Policy CC1 requirement of a 20% reduction in CO2 from on-site renewable energy generation. However, steps would be taken to minimise the energy demand including the use of high-performance building fabric, low glazing g-values, the addition of 'brise soleil', and high efficiency systems to optimise the building and reduce the energy loads. Additionally, since the entire building is being refurbished, there would be an overall improvement in the energy consumption of the entire retrofitted building compared to the existing building;
- An energy metering system, for monitoring and targeting, would be installed. The meters would be linked to the building management system so that meter readings would be automatically analysed for monitoring and targeting with the aim of reducing energy consumption. This is in line with Local Plan Policy CC1 which requires equipment to monitor the effectiveness of renewable and low carbon technologies;
- In addition to reduced energy use and carbon emissions, the expectations of Local Plan Policy CC1 would be met by (i) the proposed development being centrally located where the need to travel is minimised, (ii) the efficient use of resources with regard to construction waste, (iii) connecting to decentralised energy networks, and (iv) the development not requiring significant demolition by virtue of the retention of the majority of the building;
- The requirement of Local Plan Policy CC2 to be resilient to climate change would be met by (i) not impinging on green spaces in the vicinity of the site, (ii) having no impact on surface water run-off, (iii) minimising heat gains and significantly reducing cooling load to the spaces by proposing roof overhangs, solar control glazing and 'brise soleil', and (iv) incorporating mechanical cooling;

- The expectations of Local Plan Policy CC3 would be met because (i) the application site is located in Flood Zone 1, (ii) the proposal would not increase surface water run-off, (iii) the proposal would incorporate water efficiency measures, and (iv) water pollution during construction would be prevented;
- Compliance with Local Plan Policy CC4 would be achieved because the proposed development is generally considered low risk with regard to air pollution as significant demolition is not expected; and
- Compliance with Local Plan Policy CC5 would be achieved because construction waste will be minimised, and the hotel's existing waste storage arrangements will be retained.

Other Material Planning Considerations

7.36 The proposals would generate additional employment during the construction and operational phases of the development. The provision of local employment opportunities during both phases would be promoted through training and employment initiatives for local residents. The local employment benefits of the scheme would meet the expectations of Local Plan Policy E1 and related guidance.

8. PLANNING OBLIGATIONS – DRAFT SECTION 106 HEADS OF TERMS

8.1 In light of pre-application advice from the LPA, and having regard to Local Plan Policy DM1 and the Council's published guidance, it is anticipated that the grant of planning permission would be subject to a range of planning obligations. Subject to contract, the following draft s.106 Heads of Terms are currently envisaged:-

- A Construction Management Plan;
- A Highways Works Contribution in respect of repairs to the highway arising in relation to scheme implementation;
- The provision of Local Training & Employment Initiatives; and
- An Operational Management (Servicing) Plan.

9. SUMMARY & CONCLUSIONS

- 9.1 ILH's proposals for the up-grading and extension of the Imperial Hotel have been subject to extensive and constructive pre-application engagement with both the LPA and the local community. The existing hotel is in need of modernisation, and the application scheme would represent a substantial investment in the hotel by the applicants. The resulting improvements to the hotel, which is situated in a highly sustainable central London location, are fully supportable, as a matter of land-use principle, against all levels of planning policy, including London Plan Policy 4.5 and Camden Local Plan Policy E3.
- 9.2 Having regard to the application of relevant criteria under Local Plan Policy H2, the provision of residential accommodation in association with the proposed uplift in hotel floor space is not considered appropriate in this case.
- 9.3 The proposed alterations and extensions to the building and its curtilage would result in significant overall benefits to the character and appearance of the building and this part of the Bloomsbury Conservation Area. In particular, the scheme delivers decisive improvements to the public realm in Russell Square by enhancing the ground floor frontage, refurbishing the hotel's principal elevation, and de-cluttering its roof-line. The proposed extensions and related alterations have been sensitively designed to reflect the architectural characteristics and qualities of the host building, and in all but one respect, the scheme's impact on heritage assets would be beneficial or neutral. The less than substantial harm arising to the setting of the Hotel Russell is, on balance, justified by the public benefits provided by the scheme.
- 9.4 The application scheme would have no material impact on the living conditions of local residents, or on local traffic and highway conditions. Construction impacts would be appropriately mitigated. The extensions and related works would be undertaken to a high standard of sustainable design and construction. The proposal would also deliver local employment benefits.
- 9.5 The application proposals are therefore considered to represent sustainable

development which accords with the revised NPPF, and with the statutory development plan including London Plan Policies 4.5, 5.2, 5.3, 6.3, 7.4, 7.6, 7.8, 7.11, and 7.12, and Camden Local Plan Policies G1, H2, E1, E3, A1, A2, A4, D1, D2, D3, CC1, CC2, CC3, CC4, CC5, TC3, T1, T2, T4 and DM1. The proposals also meet the relevant expectations of London-wide and local planning guidance.

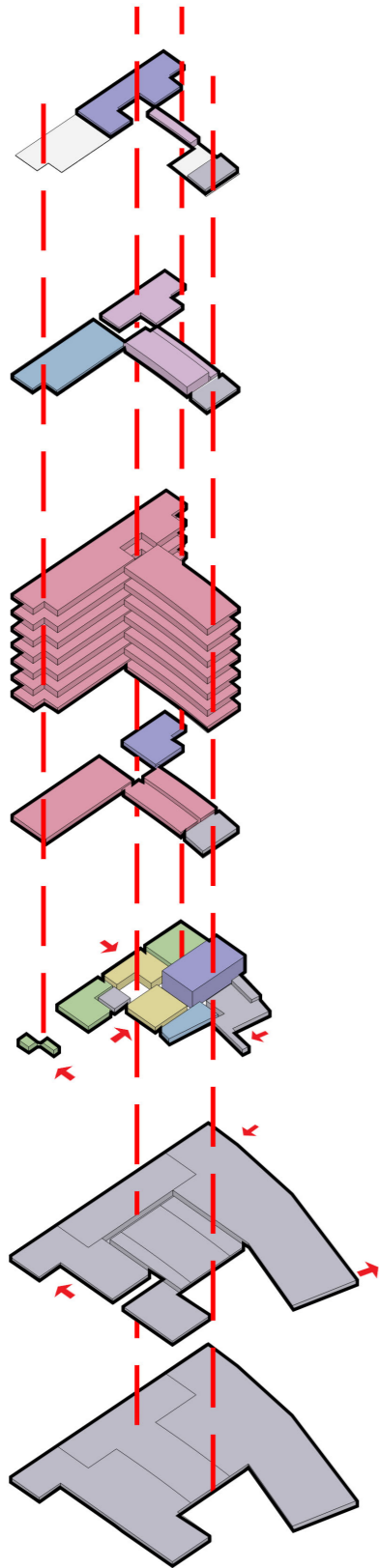
- 9.6 The applicants look forward to continued constructive dialogue with officers, and to the application being brought forward for favourable determination by the Planning Committee.

CHRISTOPHER WICKHAM ASSOCIATES

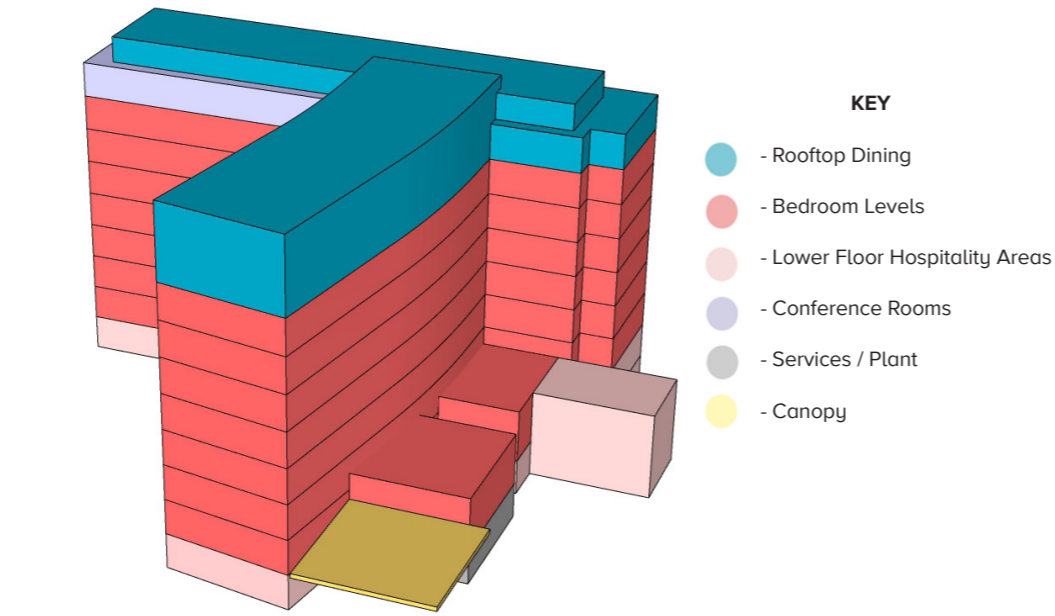
June 2019

APPENDIX

Document 1: Drawings nos. 1289-P1106-A and 1289-P1107-A

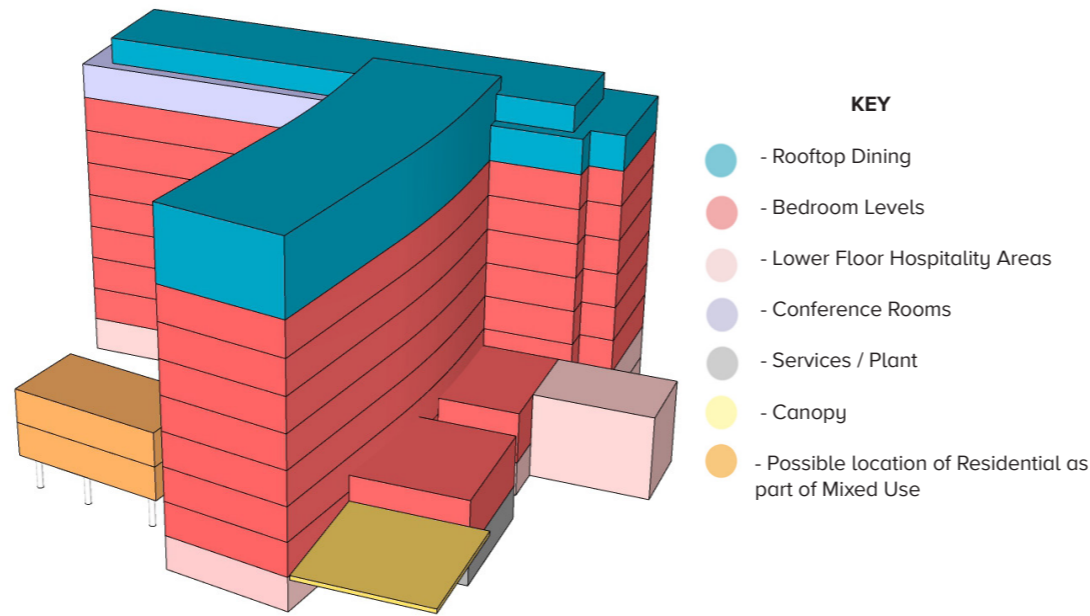


Overall Configuration of Hotel



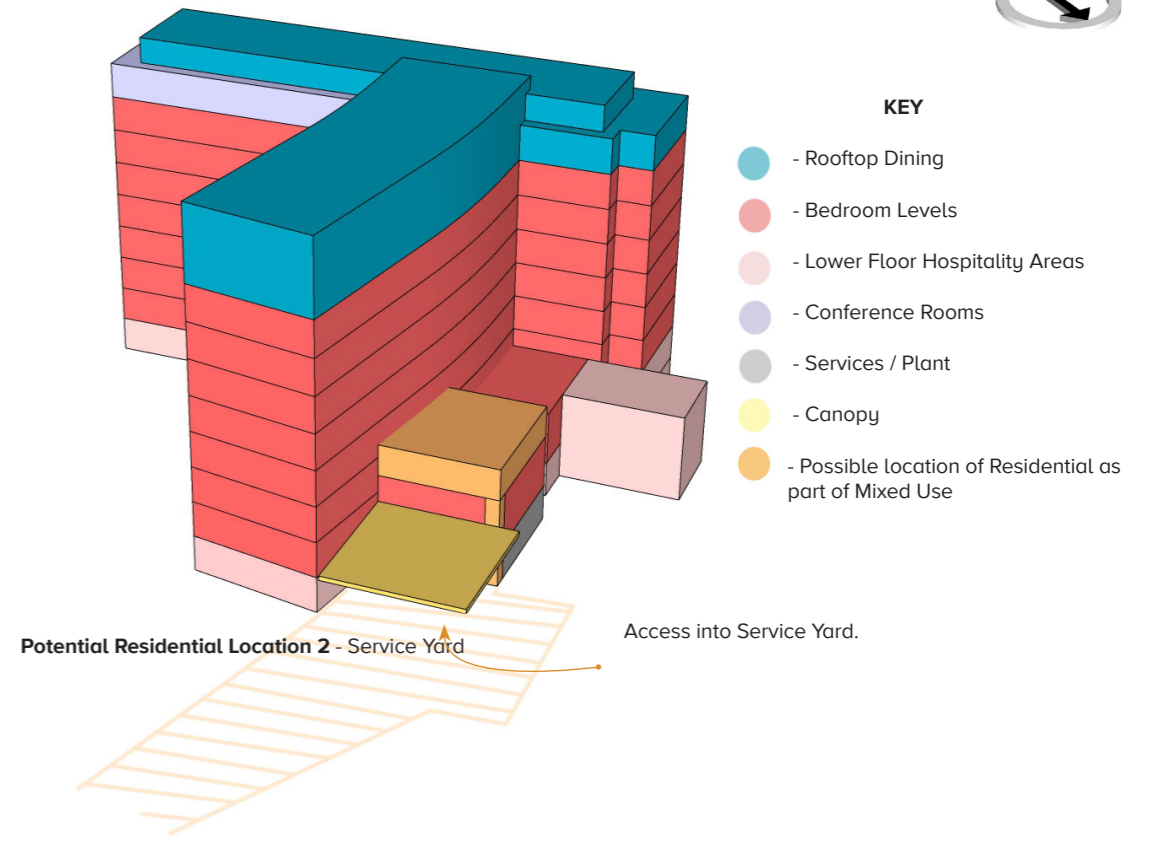
Proposed Usage of Hotel Upon Completion

- KEY**
- Rooftop Dining
 - Bedroom Levels
 - Lower Floor Hospitality Areas
 - Conference Rooms
 - Services / Plant
 - Canopy



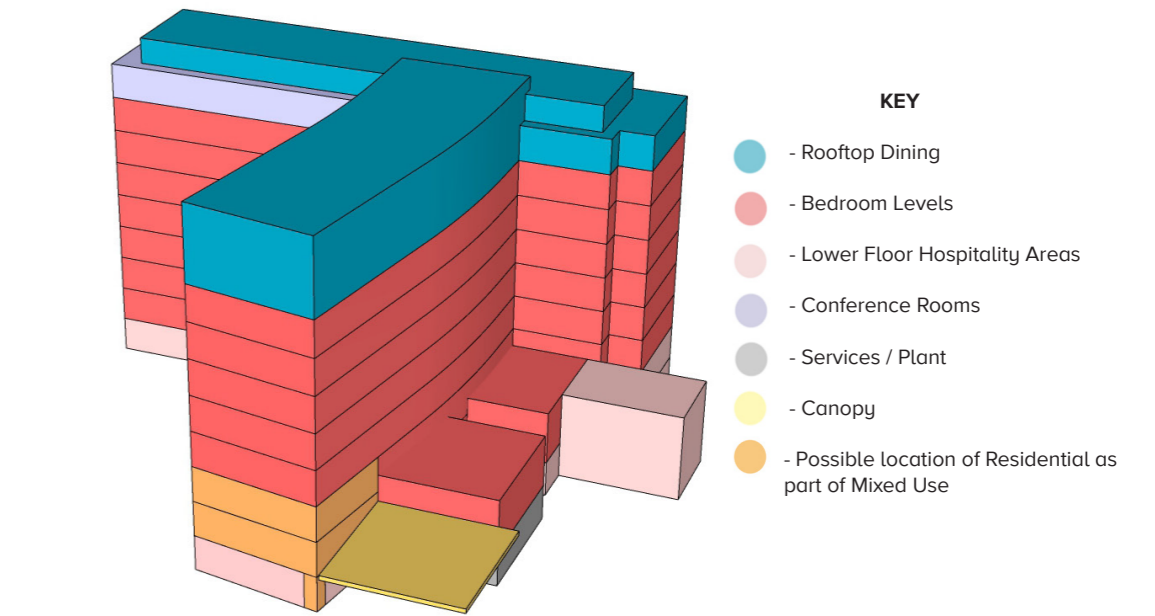
Potential Residential Location 1 - Courtyard

- KEY**
- Rooftop Dining
 - Bedroom Levels
 - Lower Floor Hospitality Areas
 - Conference Rooms
 - Services / Plant
 - Canopy
 - Possible location of Residential as part of Mixed Use



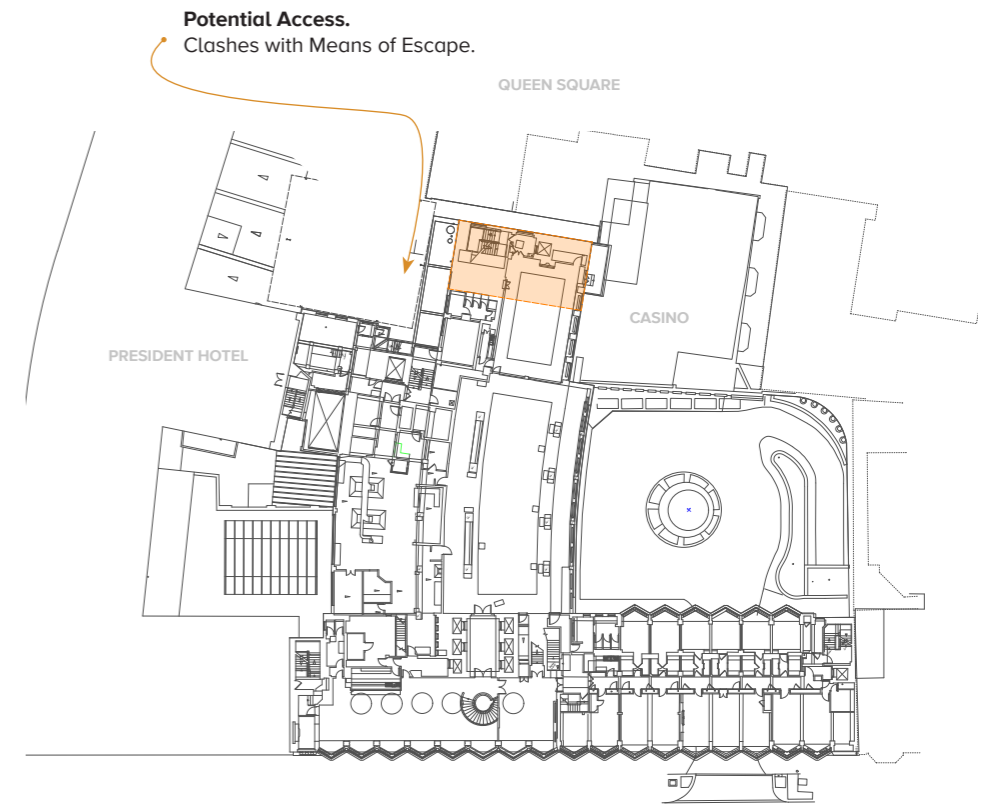
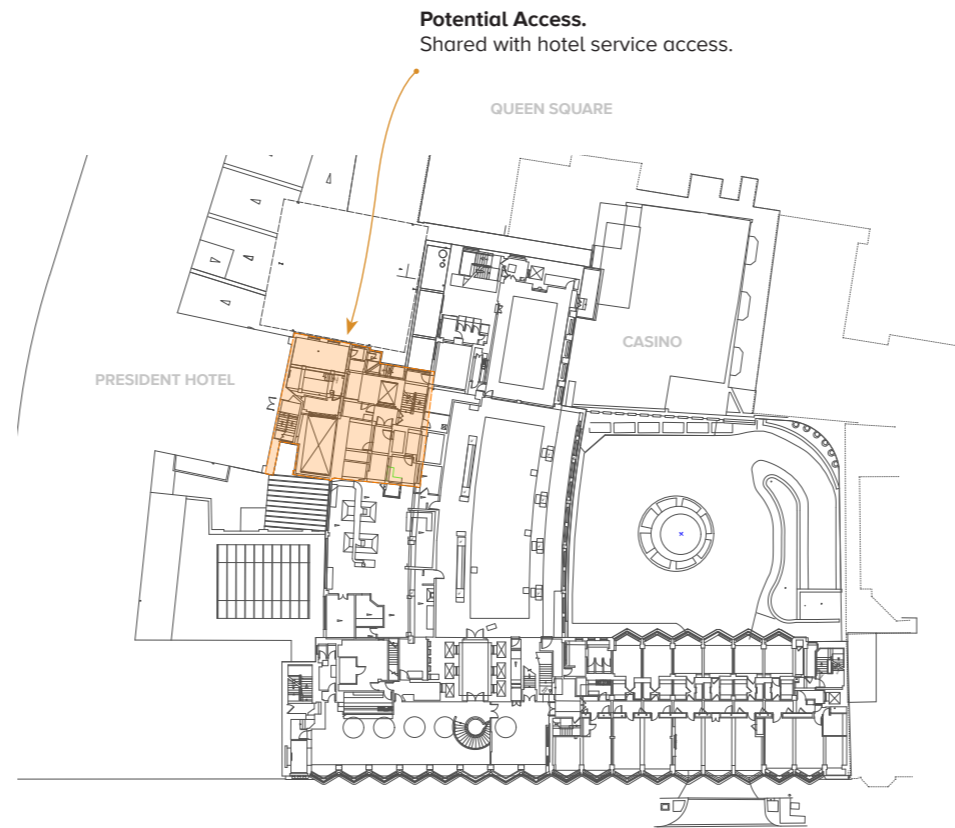
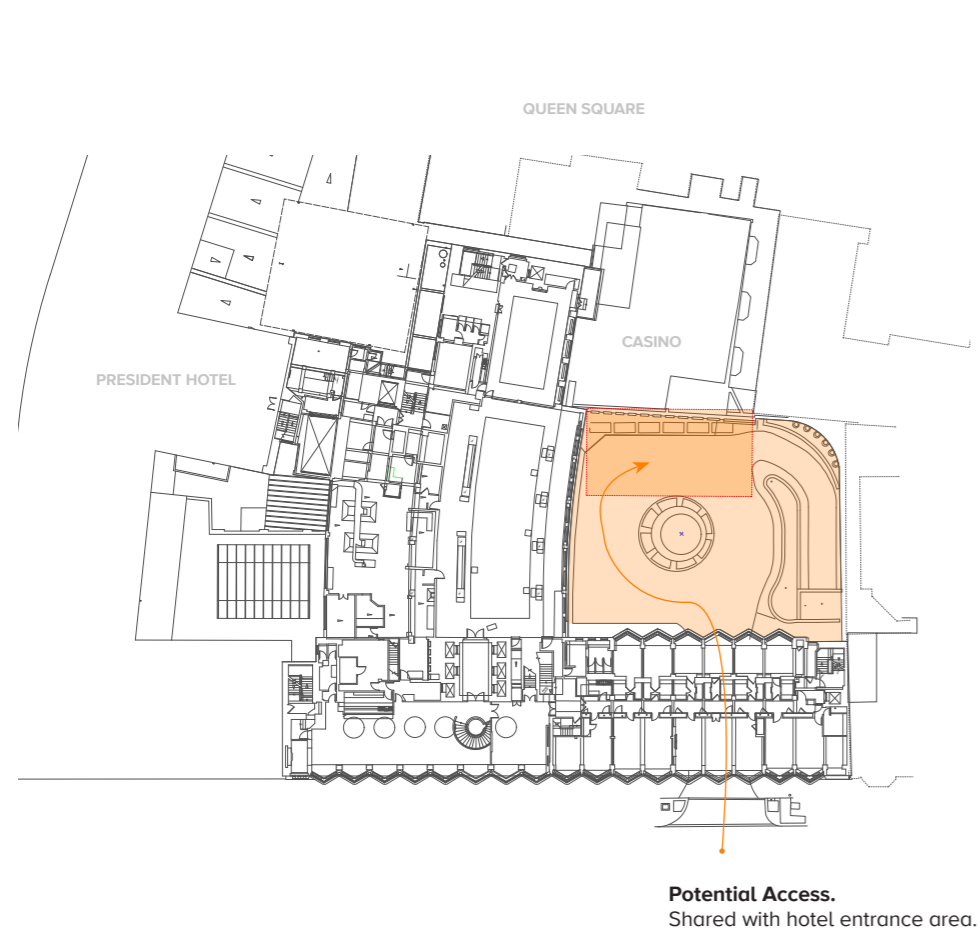
Potential Residential Location 2 - Service Yard

- KEY**
- Rooftop Dining
 - Bedroom Levels
 - Lower Floor Hospitality Areas
 - Conference Rooms
 - Services / Plant
 - Canopy
 - Possible location of Residential as part of Mixed Use



Potential Residential Location 3 - Integrated into Hotel

- KEY**
- Rooftop Dining
 - Bedroom Levels
 - Lower Floor Hospitality Areas
 - Conference Rooms
 - Services / Plant
 - Canopy
 - Possible location of Residential as part of Mixed Use



Potential Residential Location 1 - Courtyard

Issues

- Ground level development would impede access to hotel & public car park.
- Shared access with hotel & public car park.
- Balconies or roof terrace would be overlooked.
- Poor outlook and light due to enclosed space.
- Overlooking from hotel.
- Impact on hotel outlook.

Potential Residential Location 2 - Service Yard

Issues

- Shared residential access through service yard or hotel.
- Inadequate daylight, sunlight & outlook.
- Noise & disturbance from hotel servicing and plant.
- Impact on hotel operations due to potential Environmental Health complaints.
- No amenity space.

Potential Residential Location 3 - Integrated into Hotel

Issues

- Access through hotel or its curtilage.
- Poor residential outlook, daylight & sunlight.
- Noise & disturbance from hotel servicing and plant.
- Impact on hotel operations due to potential Environmental Health complaints.
- No amenity space.
- Loss of hotel bedrooms - impact on ILH strategy & revenue.
- Exit and fire routing complications.