
Premier Inn Hotel Euston
1 Duke's Road, London WC1H 9PJ

Planning Statement

Prepared on behalf of Whitbread Group PLC

October 2019

Premier Inn Euston Extension to Existing Hotel Planning Statement

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APPENDICES

1. Location Plan

1.0 INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Whitbread Group PLC ("the Applicant") to accompany the submission of a Planning Application relating to the proposed extension to the existing Premier Inn Hotel at Euston, 1 Duke's Road, WC1H 9PJ ("the Site").
- 1.2 This Planning Statement has been completed in order to explain the nature of the application scheme, assesses the proposal against relevant planning policy at a national, regional and local level and to demonstrate its acceptability.

The Planning Application

- 1.3 The extent of the Site is identified on the Site Location Plan (Drawing Ref: CHQ 15.11690-PL01) provided at **Appendix 1**.
- 1.4 The Application seeks Full Planning Permission for the following works ('the Proposed Development'), as shown on the accompanying plans prepared by CHQ Partnership:
- 2-storey extension to the existing hotel building at roof level of the northern wing which fronts Euston Road;
 - lower ground plus 6-storey annexe extension within the existing service yard to the rear of the hotel;
 - reconfiguration of the ground floor to relocate and extend the existing restaurant to provide a Bar and Block branded offer;
 - relocation of entrance on Euston Road with the removal of entrance on Duke's Road; and
 - improvements to the external appearance of the hotel.

- 1.5 The Description of Development is:

"Erection of a two-storey roof top extension and a seven-storey annexe extension to existing hotel (Use Class C1), ground floor restaurant (Use Class A3) together with alterations to the external appearance, new access, plant, car parking and associated works".

Scheme Objectives and Benefits

- 1.6 The Proposed Development represents an opportunity to deliver a number of economic, social and environmental benefits to Euston and the wider area:

- Provide high quality visitor accommodation at an established hotel destination to help support Camden and London's tourism industry.
- Further investment in a successful and popular facility that serves the wider Euston area.
- Retain the existing level of employment at the hotel and the potential creation of new jobs as part of this development. Additional temporary jobs will also be created during the construction and fit out period.
- Improve the offer and attraction of the existing hotel to the benefit of guests working in / visiting the local area.
- Maximise the potential of the Site and increase investor confidence in the immediate area.
- Development of sustainable and high-quality design and associated improvements, representing an appropriate response to the character of the Site and immediate area.
- Improvements to the ground floor in relation to the offer of restaurant facilities and increase in active frontages along Euston Road.

1.7 This represents sustainable economic development in line with the National Planning Policy Framework (NPPF).

1.8 In advance of the submission of this Planning Application, the Proposed Development has been subject to pre-application consultation with Officers at London Borough of Camden ('LBC'), key stakeholders and the local community. Further details of this and the feedback received is set out within the Statement of Community Engagement, prepared by Camargue.

1.9 The Planning Application comprises of the following:

- Completed Application Forms and Ownership Certificates;
- Application Drawings (August 2019), prepared by CHQ Architects;
- Design and Access Statement (July 2019), prepared by CHQ Architects;
- Planning Statement (October 2019), prepared by Barton Willmore LLP;
- Transport Statement (July 2019), prepared by RGP;
- Travel Plan (July 2019), prepared by RGP;
- Delivery and Servicing Management Plan (July 2019), prepared by RGP;
- Heritage Statement (July 2019) encompassing Verified Views, prepared by Wessex Archaeology;
- Daylight and Sunlight Report (July 2019), prepared by CBRE;
- Supplementary Daylight and Sunlight Report (October 2019), prepared by GIA;
- Sustainability and Energy Statement (June 2019), prepared by Jenks Associates;
- BREEAM Pre-Assessment (July 2019), prepared by Greenage;
- Noise Impact Assessment (May 2019), prepared by WYG;

- Ground Conditions Report (2018), prepared by Resource and Environmental Consultants;
- Drainage Assessment (July 2019), prepared by Simpson;
- Viability Assessment (August 2019), prepared by Barton Willmore;
- Opportunity Land Assessment (August 2019), prepared by Barton Willmore;
- Ecology Report (July 2019), prepared by WYG; and
- Statement of Community Involvement (July 2019), prepared by Camargue.

1.10 Taken together these documents provide a full and detailed justification of the Proposed Development and its appropriateness against the Development Plan and other material considerations.

Statement Contents

1.11 This Statement is set out as follows:

- Section 2 describes the Application Site and the main features of the surrounding area;
- Section 3 describes the main components and features of the Proposed Development;
- Section 4 outlines the relevant planning policy context of the Site and the Proposed Development;
- Section 5 sets out a planning assessment of the Proposed Development against national and local policy requirements; and
- Section 6 provides a summary and our conclusions on the Proposed Development.

2.0 APPLICATION SITE & SURROUNDINGS

Application Site and Surrounding Area

- 2.1 The extent of the Application Site is defined in red on the Site Location Plan which is provided at **Appendix 1**. The Site extends to 0.31Ha.
- 2.2 The Site comprises an existing hotel located on the corner of Duke's Road and Euston Road (A501). The hotel is an 'L' shaped 7-storey (lower ground plus 6-storey) building providing 265 hotel rooms with restaurant/bar and Costa Coffee at ground floor. The hotel can be split into two wings, the northern wing which fronts Euston Road and the western wing that fronts Duke's Road. The western wing extends to 9 storeys above ground floor, with levels 6 to 9 occupied by residential use ('Somerton House') which is leased by the London Borough of Camden. Somerton House does not form part of the Proposed Development.
- 2.3 The main hotel entrance is via Duke's Road on the south-western elevation. To the rear, is a shared service yard/car park under the western wing of the hotel. The yard is used for servicing and car parking for hotel use and car parking for the residents of Somerton House. The under-croft car park currently has 16 existing parking spaces, including 3 disabled car parking spaces. The service yard and car park are accessed via a ramp off Duke's Road.
- 2.4 The existing hotel was established in 1996 through a change of use application from office use and was subsequently extended in 2003. In its current built form the existing hotel is considered to detract from the street scene with an unsightly appearance and is in need of an aesthetic uplift.
- 2.5 The wider area is characterised by the commercial nature of Euston Road which comprises a series of large standalone buildings to the north, east and west of the Site. The prevailing heights of the surrounding area range from 5 to over 20 storeys.
- 2.6 The Site is partially located within the Bloomsbury Conservation Area with its northern boundary running directly through the Site. There are a number of listed properties within the immediate surrounding area. To the west of the Site is the Grade I listed Church of St Pancras and to the south is the Grade II listed, The Place. To the north of the Site on the opposite side of Euston Road is the Grade II listed Elizabeth Garret Anderson Hospital. A Heritage Statement has been prepared and is submitted as part of this Planning Application, which provides a description of the significance of the above heritage assets.
- 2.7 The Site is in a highly accessible location in terms of public transport with a PTAL Rating of 6b. There is an extensive range of local bus routes serving the Site, with the nearest bus stop located on Euston Road, approximately 50m to the northeast of the hotel. Euston station is

located approximately 275m to the west of the Site and forms a major terminus on the National Rail Network as well as providing access to both the Victoria and Northern Lines on the London Underground. Euston Square London Underground Station, which is accessible from Euston Road, provides access to the Circle, Metropolitan and Hammersmith and City lines and is located approximately 450m to the west of the Site. Furthermore, Kings Cross St. Pancras is located approximately 450m to the northeast of the Site and provides access to a number of London Underground lines and is also a major terminus on the National Rail network as well as providing international services on the Eurostar Network.

- 2.8 The entirety of the Site lies within Flood Zone 1 (a low probability of flooding). In relation to ground conditions, a Phase 1 (Desktop) Environmental Survey has been undertaken and a report is submitted with this Application.

Relevant Planning History

- 2.9 It is understood that a mixed-use office and residential building with a petrol filling station at ground floor level was constructed in the 1960s on the Site.
- 2.10 Planning Permission (LPA Ref: 9501883R1) was granted in December 1996 for the change of use of ground to 5th floor levels of the building from office (Use Class B1) to hotel (Use Class C1) with continued use of basement for parking.
- 2.11 Planning Permission (LPA Ref: PSX0104117) was granted in August 2003 for the removal of the petrol filling station and infilling of two levels of additional bedrooms to create a total of 57 new hotel rooms.
- 2.12 The remaining planning history for the Site relates to the display of advertisements and the installation of plant at roof level.

3.0 THE PROPOSED DEVELOPMENT

Background

- 3.1 The Proposed Development will deliver a number of distinct benefits, representing a significant investment in Camden by Whitbread Group PLC. This responds to an identified commercial and customer need for additional hotel bed spaces in this location.
- 3.2 Premier Inn currently operates a second hotel on Euston Road to the immediate north east of the Application Site.
- 3.3 The facility at the Application Site is extremely popular with both business and tourist visitors given the Sites close proximity to Euston Station. The high average occupancy levels of the hotel have established a clear requirement to expand at this location to fulfil an identified customer need.

The 'Premier Inn' Brand

- 3.4 Whitbread Group PLC both own and operate the 'Premier Inn' brand. Premier Inn is the biggest hotel brand in the UK, with almost 785 hotels nationwide, providing over 74,000 bedrooms.
- 3.5 Premier Inns have an excellent reputation for providing quality rooms within a budget pricing structure. A typical Premier Inn bedroom will provide the following features:
 - King sized bed;
 - En suite bathroom with shower and bath in most;
 - Remote control TV;
 - Spacious desk area with tea and coffee making facilities; and
 - Internet access.
- 3.6 Premier Inn has an aspiration to grow space to provide 85,000 rooms by 2020 in order to respond to customer demand. This will be achieved through the provision of new hotels but also via the expansion to existing well performing facilities. The expansion of the Premier Inn Euston hotel forms an integral part of that strategy and will enhance the area's offer to business tourists and visitors.

Scheme Evolution and Pre-Application Process

- 3.7 The Proposed Development has been developed through a pre-application process with a meeting being held with LBC Officers on 3rd October 2018, with written advice received from LBC on 19th October 2018.

3.8 Comments received with the pre-application advice from LBC can be summarised as:

- The proposal to extend the existing hotel building to provide additional hotel bedrooms is acceptable in principle, subject to the associated provision of self-contained housing and subject to other considerations.
- The existing building is considered to be of poor quality and does not make a positive contribution to the character and appearance of the wider area; in fact it could be said to detract from the character and appearance of the wider area, particularly due to its poor relationship with the street (e.g. the lack of active frontage along Euston Road) and its dated appearance (e.g. the cladding at the upper levels).
- On the basis that the existing building has a poor quality external appearance, the Council would not support a proposal to extend the building upwards, as this would exacerbate the negative impact on the wider area, contrary to aims of Policy D1.
- The proposed alterations to the front elevation of the building are not acceptable as the proposal to remove the existing opening onto Euston Road would mean the building has no active frontage onto Euston Road, which is not acceptable for such a key street.
- The proposed extension to the rear, within the existing service yard, is considered to be acceptable and you are advised to explore ways in which to add even more rooms at the rear, rather than extending upwards.
- Whilst the roof-top extension is set away from the Somerton House dwellings by 10 metres, it would still impact on the outlook from the eastern facing dwellings to some extent, removing their long-range views along Euston Road. However, overall, the impact is considered to be acceptable as it is not considered that the extension would appear unduly overbearing when viewed from these properties.
- The Council may be able to support a proposal to extend the building upwards, if this formed part of a comprehensive redevelopment of the building. The Council would also support any changes to the front of the building that would give the building a better relationship with Euston Road.

3.9 The scheme has undergone a number of design iterations to address comments received during pre-application discussions with LBC. These design iterations include:

- Increase in height of the rear extension by 1-storey.
- Inclusion of improvements to the existing appearance of the hotel including refurbishing and recolouring the existing cladding.

- Reconfiguration of the ground floor layout to provide further active frontage on Euston Road.
- Removing the entrance to the hotel on Duke's Road and relocating the entrance onto the Euston Road frontage.
- The materials of the proposed roof top extension have evolved with the introduction of projecting cladding.

3.10 As part of the pre-application process the Applicant has presented the scheme to Ward Councillors, Somerton House Resident's Group and the owners of the Dance Studio in June 2019. Full details of all engagement carried out in respect of the Proposed Development are included in the Statement of Community Engagement accompanying the Application.

The Scheme

- 3.11 The component parts of the Proposed Development are set out in Section 1 of this Planning Statement, with additional information in the application plans and drawings and supporting Design and Access Statement submitted as part of this Planning Application.
- 3.12 The proposal is for a 2-storey extension to the existing hotel building at roof level of the northern wing which fronts Euston Road and a 7-storey (lower ground plus 6-storey) annexe extension within the existing service yard to the rear of the hotel. The proposed extensions would provide an additional net 66 bedrooms resulting in a total of 331 rooms across the hotel.
- 3.13 The proposed extension results in an increase of 2,524sq.m (GIA) of floorspace.
- 3.14 The increased number of rooms results in the need for improved ancillary facilities and food and beverage offer. A proposed new reception area will provide additional space allowing further reconfiguration of the ground floor to relocate and extend the existing restaurant which will be rebranded to 'Bar and Block'.
- 3.15 The reconfiguration of the ground floor includes the removal of the existing entrance along Duke's Road which has been relocated to Euston Road. This reconfiguration has increased the active frontage through the use of full height fenestration for the new Bar + Block Steakhouse restaurant and the main entry point to the hotel.
- 3.16 The proposals include improvements to the external appearance of the building with the refurbishment and recolouring of existing cladding to a light grey at 1st to 6th floor with a dark grey cladding and brickwork at ground floor.

- 3.17 The existing plant at roof level will be relocated to the north east to allow for the erection of the two-storey extension.
- 3.18 Existing car parking associated with the hotel use will reduce to 5 spaces (4 disabled spaces) located to the rear of the Site. There are no changes to the residential car parking spaces on the Site.
- 3.19 Vehicular access and egress to the Site will remain as existing. Furthermore, the existing servicing to the hotel would remain on-site, with only a slight increase in servicing as a result of the reconfiguration of the ground floor restaurant.
- 3.20 The proposals include improvements to the existing decking/seating area located along Duke's Road, with the introduction of planters and 5 bike stands.
- 3.21 The Proposed Development will address the deficiencies of the existing hotel and provide a marked improvement in both the quality and offer of accommodation available to visitors in this location. The Proposed Development represents a further significant investment by Whitbread in the Euston area in addition to its investments elsewhere in the Borough.

4.0 PLANNING POLICY CONTEXT

Introduction

- 4.1 This section sets out the planning policy framework relevant to the Site and the Proposed Development.
- 4.2 The National Planning Policy Framework (NPPF) forms a primary consideration for the Planning Application alongside the Development Plan.
- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Site comprises the London Plan (March 2016) and the Camden Local Plan (2017).
- 4.4 The adopted Proposals Map (2019) confirms that the site is located within the Central London Area and included in an area of Central London Frontage and is partially located within the Bloomsbury Conservation Area.
- 4.5 This section sets out the planning policy framework relevant to the Site and Proposed Development.

National Planning Policy Framework

- 4.6 The National Planning Policy Framework (NPPF) was updated in February 2019 and sets out the Government's objectives for achieving sustainable development. The NPPF establishes a presumption in favour of sustainable development. Paragraph 8 confirms there are three dimensions to sustainable development: economic, social and environmental.
- 4.7 When making planning decisions, Paragraph 11 of the NPPF confirms that there should be a presumption in favour of sustainable development and that planning permission should be granted where development proposals accord with the development plan. This approach is applied in the assessment of the Proposed Development.
- 4.8 Section 4 sets out guidance on decision making, encouraging local planning authorities to approach decisions on proposed development in a positive and creative way, working proactively with applicants to secure development that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible (Paragraph 38).
- 4.9 Section 6 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, with significant weight being

place on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future (Paragraph 80).

- 4.10 Section 9 sets out guidance on promoting sustainable transport, encouraging significant developments to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes (Paragraph 103).
- 4.11 Planning policies and decisions should, amongst other matters gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and promote and support the development of under-utilised land and buildings (Paragraph 118).
- 4.12 Section 12 of the NPPF provides guidance aimed at achieving well-designed places. It outlines the importance of design of the built environment and that good design is a key aspect of sustainable development (Paragraph 124).
- 4.13 The NPPF sets out in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Paragraph 189). NPPF Paragraph 196 is clear 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, where appropriate, securing its optimum viable use.
- 4.14 The NPPF is clear at Paragraph 201 that not all elements of a conservation area will necessarily contribute to its significance.

Planning Policy Guidance

- 4.15 In March 2014, the Government launched the Planning Practice Guidance (PPG) as an online web-based resource. PPG is a live document that has been periodically updated. In its most up-to-date form, PPG is a material consideration in the decision-making process.
- 4.16 The PPG reinforces the NPPF in terms of the need for Local Planning Authorities to support Town Centres and states that a wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development (Para 01 ID:2b-001-20190722).

The London Plan

- 4.17 The London Plan (2016) is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 4.18 The consolidated London Policy 4.5 'London's Visitor Infrastructure' states that the Mayor will support London's visitor's economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of hotel provision. The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2036.
- 4.19 London Plan Policy 4.5 seeks to ensure that visitor accommodation is in appropriate locations and when it is within the Central Activities Zone ('CAZ'), strategically important hotel provision should be focussed on its opportunity areas, with smaller provision in CAZ fringe locations with good public transport.
- 4.20 London Plan Policy 4.5 continues to set out specific requirements for councils to promote and facilitate a range of visitor accommodation and specifically requiring councils to support and encourage development of good quality budget category hotels.
- 4.21 The London Plan also sets out other relevant policies in relation to design, transport and energy. These are reference in the relevant supporting documentation submitted as part of this Application.
- 4.22 The Mayor of London has prepared a Draft London Plan which has undergone Examination in Public between January and May 2019. The Mayor published a consolidated suggested changes version of the Draft London Plan (2019) on 15th July 2019, with it's policies having some material weight in the determination of planning decisions.

Camden Local Plan

- 4.23 The Camden Local Plan (2017) Proposals Map confirms that the Site is located in the Central London Area, includes an area of Central London frontage and is partially located within the Bloomsbury Conservation Area.
- 4.24 Local Plan Policy E3 (Tourism) recognises the importance of the visitor economy in Camden and supports tourism development and visitor accommodation. Policy E3 expects new large-scale tourism development and visitor accommodation to be located in Central London, particularly in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn.
- 4.25 Local Plan Policy H1 (Maximising housing supply) seeks to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing.

- 4.26 LBC's Local Plan Policy H2 encourages the inclusion of self-contained homes in non-residential development in all part of the Borough. In the Central London Area as well as specified town centres within the Borough ('specified areas'), Policy H2 states that where development involves additional floorspace of more than 200sq. m (GIA), LBC will require 50% of all additional floorspace to be self-contained housing, subject to specific site considerations. As the Site is located within the Central London Area it is considered that this policy applies to the Proposed Development.
- 4.27 Where development is located within specified areas, Policy H2 states that LBC will consider whether self-contained housing is required as part of a mix of uses taking into account the following:
- 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;
 - c. The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - 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. Whether the development is publicly funded or serves a public purpose.
- 4.28 Policy H2 continues to state that where housing is required as part of a mix of uses, LBC will require self-contained housing to be provided on site, particularly where 1,000sq. m (GIA) of additional floorspace or more is proposed. Where LBC is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, LBC will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.
- 4.29 Policy H2 goes on to state that the Council will consider whether housing should be provided on site and the most appropriate mix of housing and other uses, taking into account criteria a. to e. (set out above) and the following additional criteria:
- f. The need to add to community safety by providing an active street frontage and natural surveillance;
 - g. The extent of any additional floorspace needed for an existing user;
 - h. The impact of a mix of uses on the efficiency and overall quantum of development;
 - i. The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and

- j. Whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- 4.30 Paragraph 3.41 of the supporting text summarises that *"However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought"*. Supporting Paragraph 3.54 continues to state that *"There may be circumstances (even when the additional floorspace is 1,000sq. m or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user)"*.
- 4.31 Local Plan Policy D1 (Design) seeks to secure high quality design in development and sets out an extensive list of requirements that developments should achieve.
- 4.32 Local Plan Policy D2 (Heritage) seeks to preserve and, where appropriate enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 4.33 With specific regards to conservation areas, Policy D2 requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area and resist development outside of a conservation area that causes harm to the character or appearance of that conservation area.
- 4.34 Other relevant Local Plan policies included:
- Policy H4 Maximising the supply of affordable housing
 - Policy A1 Managing the impact of development
 - Policy A3 Biodiversity
 - Policy A4 Noise and vibration
 - Policy CC1 Climate change mitigation
 - Policy CC2 Adapting to climate change
 - Policy CC3 Water and flooding
 - Policy CC4 Air quality
 - Policy CC5 Waste
 - Policy C5 Safety and security
 - Policy C6 Access for all
 - Policy TC4 Town Centre Uses
 - Policy T1 Prioritising walking, cycling and public transport
 - Policy T2 Parking and car-free development
 - Policy T3 Transport infrastructure

- Policy T4 Sustainable movement of goods and materials

4.35 These are reference in the relevant supporting documentation submitted as part of this Application.

Other Material Considerations

4.36 The Euston Area Plan (EAP) was drafted in anticipation of the redevelopment of Euston Station, which will include the addition of High Speed Two (HS2). The EAP was prepared jointly by Camden Council and the Greater London Authority (GLA) to ensure that the strategic and local issues for the Euston area are planning in a coordinated manner. The EAP sets an objective for the Euston Road Area of creating a more pleasant and accessible street environment, seeking enhancements to Euston Square Gardens and improved road crossings.

4.37 LBC have reviewed its Camden Planning Guidance (CPG) documents to support the delivery of the Local Plan following its adoption in 2017. The adopted CPG documents can be a material consideration in planning decisions, although they have less weight than the Local Plan or other development plan documents.

4.38 The CPG's of relevance to the determination of this Application include:

- Amenity CPG – March 2018
- Design CPG – March 2019
- Developer Contribution CPG – March 2019
- Interim Housing CPG – as amended March 2019
- CPG 2 Housing – as amended March 2019
- Transport CPG – March 2019

Policy Conclusions

4.39 The application proposals need to be assessed against the policies of the NPPF, the London Plan and more general policies of the Development Plan

4.40 Within this context, the NPPF encourages sustainable development and technically requires compliance with the sequential approach. At the local level, policy requires assessment of the scheme against the following matters:

- Appropriateness of the Proposed Use;

- Sequential Approach;
- Design Approach;
- Heritage;
- Transport, Access and Servicing;
- Amenity;
- Drainage;
- Sustainability; and
- Ecology and biodiversity.

4.41 We turn to consider these matters in Section 5.

5.0 PLANNING ASSESSMENT

5.1 This section outlines our assessment of the Proposed Development against the planning policy context identified in Section 4. As referred to in Section 4, the relevant planning policy considerations relate to the 2-storey extension at roof level and the 7-storey (lower ground plus 6 storey) annexe extension within the service yard.

Decision-Making Approach

5.2 The NPPF forms a primary consideration for the planning application alongside the Development Plan.

5.3 Within this context, we believe the proposed development should be defined as sustainable development for the following reasons:

- **Economic Role:** the proposed development will contribute towards reinforcing a strong, responsive and competitive 'local' economy within the Euston Road area through the delivery of expanded hotel accommodation and direct and indirect job creation. The proposal will maintain the existing level of employment at the hotel. Additional jobs will be created through the construction of the extension. The development will support the wider commercial area and be of an appropriate scale serving the needs of the local area.
- **Social Role:** the proposed development will make a series of contributions to helping maintain a strong community. In particular, the scheme will build on existing community links and provide additional guest accommodation further enhancing facilities in the local area. Additional guests will increase awareness and expenditure within the local area.
- **Environmental Role:** the proposed development has been specifically designed to contribute towards the quality of the built environment of the area due to the level of design applied to the extension and the investment in the existing building. The extension will utilise brownfield land and sustainability measures have been introduced where possible (see paragraphs 5.109-5.119 of this Statement).

5.4 Arising from this Assessment, we then examine whether there are any adverse impacts which would arise from the Proposed Development and demonstrably outweigh the benefits when assessed against the NPPF's policies as a whole; or whether there are any specific policies in the NPPF which indicate development should be restricted. The outcome of this Assessment and consideration of other material considerations will then inform whether the Proposed Development should benefit from Planning Permission.

5.5 To inform this assessment, the key issues to be tested are:

- Appropriateness of the Proposed Use;
- Sequential Approach;
- Design Approach;
- Heritage;
- Transport, Access & Servicing;
- Amenity;
- Drainage;
- Sustainability; and
- Ecology and Biodiversity.

5.6 These are assessed in the remainder of this Section.

Appropriateness of Proposed Use

Hotel Use

- 5.7 The Proposed Development provides 2,524 sqm (GIA) of additional floorspace over two extensions to provide a net increase of 66 new bedrooms at an existing and well performing facility. The siting of the extensions are contained within the site boundary to ensure it will have minimal impact on the surrounding area.
- 5.8 The additional bedrooms proposed will help to improve the offer of the Premier Inn at this location and will provide a quality facility which will better meet an identified need for additional hotel rooms in close proximity to the key transport hubs of Euston, Kings Cross and St Pancras Stations.
- 5.9 The hotel use has long been established in this location, following the grant of Planning Permission in 1996. The Site is located within London's Central Activities Zone (CAZ) where development of visitor accommodation is encouraged. The acceptability in principle, of extending the hotel use in this area should therefore be considered acceptable.
- 5.10 The London Plan Policy 4.5 seeks to achieve 40,000 net additional hotel bedrooms by 2036 and encourages development of good quality budget category hotels, especially in the Central Activities Zone ('CAZ').
- 5.11 The Draft London Plan Policy E10 reaffirms existing policy and seeks to achieve an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. This updated figure leads to an additional 400 rooms per year required across London. The Proposed Development seeks to help meet this objective.

- 5.12 LBC's Local Plan Policy E3 (Tourism) states that the Council will support tourism development and visitor accommodation. Policy E3 states that tourism development and visitor accommodation should be located in Central London and identifies Euston as a particular growth area in this regard. Policy E3 also states that all tourism development and visitor accommodation must be easily reached by public transport. The Site is located in a highly accessible location, well connected to a range of public transport means, including Euston, Kings Cross and St Pancras Stations.
- 5.13 LBC's Policy E3 also dictates that development should not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and not lead to the loss of permanent residential accommodation. Whilst the proposals seek to extend the existing hotel and increase the total amount of hotel floorspace, the development will not result in the loss of any residential units and will not harm the balance or mix of uses within the area.
- 5.14 Against this background, the proposed development complies with the requirements of the NPPF, London Plan Policy 4.5, Draft London Plan Policy E10 and LBC's Local Plan Policy E3.

Mixed-use Policy

- 5.15 LBC's Local Plan Policy H1 identifies housing as the priority land use in the Borough.
- 5.16 LBC's Local Plan Policy H2 encourages the inclusion of self-contained homes in non-residential development in all part of the Borough. In the Central London Area as well as specified town centres within the Borough ('specified areas'), Policy H2 states that where development involves additional floorspace of more than 200sq. m (GIA), LBC will require 50% of all additional floorspace to be self-contained housing, subject to specific site considerations. As the Site is located within the Central London Area it is considered that this policy applies to the Proposed Development.
- 5.17 Where development is located within specified areas, Policy H2 states that LBC will consider whether self-contained housing is required as part of a mix of uses taking into account the following:
- k. The character of the development, the site and the area;
 - l. Site size, and any constraints on developing the site for a mix of uses;
 - m. The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - n. Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and

- o. Whether the development is publicly funded or serves a public purpose.
- 5.18 Policy H2 continues to state that where housing is required as part of a mix of uses, LBC will require self-contained housing to be provided on site, particularly where 1,000sq. m (GIA) of additional floorspace or more is proposed. Where LBC is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, LBC will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.
- 5.19 Policy H2 goes on to state that the Council will consider whether housing should be provided on site and the most appropriate mix of housing and other uses, taking into account criteria a. to e. (set out above) and the following additional criteria:
- p. The need to add to community safety by providing an active street frontage and natural surveillance;
 - q. The extent of any additional floorspace needed for an existing user;
 - r. The impact of a mix of uses on the efficiency and overall quantum of development;
 - s. The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
 - t. Whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- 5.20 Paragraph 3.41 of the supporting text summarises that *"However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought"*. Supporting Paragraph 3.54 continues to state that *"There may be circumstances (even when the additional floorspace is 1,000sq. m or more) where housing cannot practically be achieved on-site or would more appropriately be provided off-site (for example where the entire additional floorspace is needed for an existing user)"*.
- 5.21 Against this background, an assessment has been undertaken against criteria a. to j. which demonstrates why it is not appropriate, practical or commercially viable to introduce residential use as part of the Proposed Development.
- a. *The character of the development, the site and the area.*
- 5.22 The character of the development is commercial. The Proposed Development seeks to provide an extension to the rear and to the roof top of the existing operational hotel to provide an additional 66 bedrooms (net).

5.23 Additionally, the existing ground floor restaurant/bar is proposed to be reconfigured to enhance this facility to increase the capacity to support the Site's hotel function and provide an enhance active frontage onto Euston Road.

5.24 Although the Site is mixed-use in nature, with the floors 6 to 9 comprising residential flats at Somerton House, these flats have been in situ since the 1960's with the hotel use being introduced in 1996.

b. Site size, and any constraints on developing the site for a mix of uses

5.25 The majority of the Site comprises the hotel building which fronts Euston Road and Duke's Road. There is a service yard/hotel and residential car park to the rear of the Site which is contained by a flank and rear wall of properties to the south of the Site. Given the existing footprint of the hotel there is only limited space for development on the Site to the rear and the roof of the existing hotel and it is therefore considered that the Site is constrained.

5.26 The hotel use requires back of house uses such as kitchens, storage, staff facilities, offices etc. and requires on-site servicing facilities to the rear to ensure the efficient operation of the Site. The hotel facility also requires a critical mass of rooms to be commercially viable.

5.27 Given the constraints of the Site to the rear, it is considered that the introduction of residential use in the service yard location would not be suitable or appropriate. It is likely that the amenity for any future residential occupier in this location would be severely limited, with the levels of daylight, sunlight and outlook for residents being limited. It is also considered that the location of residential units within an operational service yard of an existing hotel would give rise to amenity issues in relation to noise impacts. There would also be limited amount of space for private or shared residential amenity space to meet local and regional space standards.

5.28 The only appropriate location for the proposed residential floorspace, if it were to be introduced, would be at roof level of the existing hotel. CHQ Architects have produced a mixed-use feasibility scheme incorporating residential use on the roof of the existing hotel. The introduction of residential use at roof level would require the installation of a separate access and core fronting Euston road, separate ancillary facilities including waste and recycling storage and cycle storage and a separate means of power.

5.29 The provision of a separate core would seriously compromise the internal quality and layout of the existing hotel building and would result in a minimum reduction of 3 hotel bedrooms per floor. This would also raise structural issues in relation to the insertion of a new core into the existing building. The feasibility study demonstrates that the amenity standards of the proposed residential units would not provide a good level of accommodation. All of the flats

would be single aspect and the majority of units would not meet the national space standards in relation to floorspace. There would also be a limited amount of private amenity space available to future residents due to the constraints of building on an existing roof.

5.30 The introduction of residential use at roof level would make the scheme commercially unviable and would not be policy compliant or meet the commercial requirements of Premier Inn. It is therefore considered that it would not be appropriate to provide residential use as part of the Proposed Development.

c. The priority the Local Plan gives to the jewellery sector in the Hatton Garden area.

5.31 The Site is not located within the Hatton Garden area and therefore this criteria is not applicable.

d. Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses.

5.32 In principle land use terms, self-contained homes would be compatible with the character and operational requirements of the existing hotel use.

5.33 However, as outlined above under criterion b, due to the site specific physical constraints of the Site it is considered that conflicts could arise.

e. Whether the development is publicly funded or serves a public purpose.

5.34 The development is not publicly funded.

f. The need to add to community safety by providing an active street frontage and natural surveillance

5.35 The Proposed Development seeks to improve the active street frontage on Euston Road by the reconfiguration of the restaurant/bar at ground floor and the relocation of the entrance of the hotel. The introduction of a new access core on Euston Road for residential use is considered to impact the layout of the restaurant/bar and would reduce the quality of space for this function.

5.36 It is not considered appropriate to locate an access core to the rear of the building in the existing service yard due to security/safety issues.

g. The extent of any additional floorspace needed for an existing user.

5.37 The proposal seeks to provide additional bedrooms for an extremely well performing existing hotel to meet the demand of bookings experienced at the Site. The proposed extensions at the

rear and roof of the building are considered to be the minimum optimum floorspace for the scheme to be commercially viable and for the improvements to the existing external appearance and ground floor of the building to take place.

h. The impact of a mix of uses on the efficiency and overall quantum of development.

5.38 If the Proposed Development was to include residential use as part of the scheme this would require the loss of the proposed hotel bedrooms at roof level and the loss of three existing bedrooms per floor for the introduction of a new access core from Euston Road (i.e. a total loss of 15 rooms). The new access core would also impact the layout and quantum of floorspace for the ground floor restaurant. It is therefore considered that the introduction of residential floorspace on the Site would harm the Proposed Development's commercial viability.

i. The economics and financial viability of the development including any particular costs associated with it, having regard to distinctive viability characteristics of particular sectors such as build-to-let housing.

5.39 A Viability Assessment has been prepared by Barton Willmore and submitted as part of the Planning Application. The Viability Assessment demonstrates that the introduction of residential use as part of the scheme would not be viable.

j. Whether an alternative approach could better meet the objectives of this policy and the Local Plan.

5.40 There is a strategic need for more hotel accommodation within Central London and Camden to support the tourism industry. The Proposed Development seeks to meet this objective by utilising previously developed land by providing high quality additional visitor accommodation in a Growth Area location which is and will experience major change in relation to tourism through the expansion of Transport Termini in the immediate surround location.

Summary

5.41 It is clear from the above assessment that the inclusion of residential floorspace as part of the Proposed Development will undermine the commercial operation of the existing hotel and commercial viability of the scheme as a result of the number of rooms lost. It is therefore considered that residential accommodation cannot feasibly be provided on site in this instance.

5.42 Policy H2 is clear that when it has been demonstrated that residential accommodation cannot be provided on site, LBC will seek off-site provision of housing on an alternative site nearby or through a payment-in-lieu.

- 5.43 The Applicant are hoteliers and do not have control of any alternative sites within the immediate surrounding area that could be delivered for housing. A Land Opportunity Assessment has been undertaken by Barton Willmore and submitted as part of this Planning Application to explore alternative development sites within the Kings Cross Ward for the off-site provision of housing within the nearby area. The Assessment clearly demonstrates that there are no sites able to accommodate conversion to residential use in the nearby area.
- 5.44 It is therefore concluded that the most appropriate option for the Proposed Development to meet the requirements of Policy H2 is to reach agreement with LBC for a payment in lieu based on the viability of the scheme.
- 5.45 Accordingly, the Proposed Development meets the requirements and is consistent with Policy H2 of the adopted Local Plan.

Sequential Approach

- 5.46 The NPPF at paragraph 86 encourages local authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan.
- 5.47 The Site is located within the Central Activities Zone ('CAZ'). The London Plan Policy 4.5 seeks to direct visitor accommodation to the CAZ and LBC's Local Plan Policy E3 confirms that the Council would expect visitor accommodation in Central London, particularly the growth area which include Euston.
- 5.48 As such it is considered that the promotion of visitor accommodation is in accordance with an up to date Local Plan and the sequential test is therefore not required.

Design Approach

- 5.49 The design and layout of the Proposed Development is explained in the submitted drawings and Design and Access Statement, prepared by CHQ Partnership, which present the layout, scale and appearance of the Proposed Development.
- 5.50 London Plan Policy 7.4 requires new buildings to have regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass.
- 5.51 The scheme, is appropriate in scale and arrangement to the host building, comprising a 2-storey extension at roof level of the northern wing, and a 7-storey annexe extension within the existing service yard to the rear of the hotel. The proposed extensions have been designed to respond to the Site's setting and also to achieve the requirements of the client and the consumer. It is representative of the approach successfully taken at other Premier Inn hotels

within London and nationwide. This ensures that it achieves an appropriate design quality considering the existing built form.

- 5.52 Policy D1 Design states that the Council will seek to secure high quality design in development. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. The proposal responds well to the form and scale of the existing building and the surrounding area along Euston Road, which has a concentration of large scale, tall buildings with a clear precedent of roof top extensions.
- 5.53 At the pre-application meeting the scheme presented included minimal changes to the external appearance of the existing building which included the removal of the restaurant entrance and infilling of the recess, introduction of full height glazing and the roof extension was treated as a simple clad box with vertical variation in cladding colours. LBC Officers raised issues with the limited improvements to the external appearance of the existing hotel and the lack of ground floor activation on Euston Road.
- 5.54 To address the concerns expressed at the pre-application meeting by officers, the design team has evolved the scheme to include enhancements to the existing external appearance of the hotel building and reconfiguration of the ground floor to provide further active frontage onto Euston Road.
- 5.55 This design evolution includes the refurbishment and refinishing of the existing horizontal cladding bands above ground floor in a light grey, which refreshes the facades of the existing building.
- 5.56 The ground floor of the hotel has been further enhanced through the internal re-configuration of the ground floor restaurant and removal of existing bedrooms at ground floor and the introduction of a branded Bar & Block restaurant. This has enabled the entire Euston Road frontage to be activated with full height glazing. The existing render and bands of glass brick will be over clad with a new tiled finish, in horizontal bands of varying heights of slate and grey coloured tiles to provide further interest to the ground floor. The existing entrance to the hotel along Duke's Road is proposed to be removed, with the introduction of a new entrance on Euston Road, which further increases the active frontage on the principle elevation of the building at ground floor.
- 5.57 The proposed rooftop extension has been redesigned to include a framed element which will be treated in a perforated metal cladding, with a bespoke abstract non-directional pattern to provide interest to the design and ensure that the extension is read as a new element to building.

- 5.58 The rear extension is not visible from Euston Road or Duke's Road, with only limited glimpsed views from Burton Street and Flaxman Terrace. As such, the appearance of the rear extension has been designed to match the light grey cladding of the existing building.
- 5.59 Local Plan Policy D1 considers tall buildings to be those which are substantially taller than their neighbours or which significantly change the skyline. It is considered that the 2-storey extension at roof level of the northern wing would not constitute a tall building as it is lower than the height of its neighbouring buildings. The height of buildings surrounding the Site include buildings of 10 storeys, 11 storeys, 13 storeys and 17 storeys high and it is considered that the proposed extension, in relation to height, respects the existing townscape context of the surrounding area.
- 5.60 The proposed height of the extension accords with the surrounding prevailing building heights and is considered to be appropriate in this Growth Area location. The proposed annexe extension to the rear of the hotel cannot be viewed from either Euston Road or Duke's Road, due to its concealment by the position of the existing host building and its location within the existing service yard. It is therefore considered that this part of the proposals would not impact the townscape of the surrounding area.
- 5.61 It is acknowledged that the host building, as existing, is of a relatively poor aesthetic quality in relation to its surrounding conservation area setting. Extensive design development has been undertaken by the design team to enhance the appearance of the existing building, however a more comprehensive redevelopment of the Site, which comprises a well performing hotel, is not commercially viable due to the disruption that this would cause to the trading asset.
- 5.62 The scheme as proposed, provides the optimal deliverable development, which seeks to provide a high quality extension to the existing hotel, which is appropriate both in scale and design.
- 5.63 It is therefore considered that the design of the Proposed Development in terms of height, scale and appearance accords with London Plan Policy 7.4 and LBC Local Plan Policy D1.

Heritage

- 5.64 NPPF Paragraph 196 confirms that local planning authorities should look for opportunities for new development within conservation areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or better reveal its significance should be treated favourably).
- 5.65 The NPPF is clear at Paragraph 201 that not all elements of a conservation area will necessarily contribute to its significance.

- 5.66 London Plan Policy 7.8 sets out that development should identify, value, conserve, restore, reuse and incorporate heritage assets, where appropriate. Development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.67 Local Plan Policy D2 (Heritage) seeks to preserve and, where appropriate, enhance Camden's heritage assets and their settings. The policy also seeks to resist development outside of conservation areas that causes harm to their character or appearance. Policy D2 states that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 5.68 As set out within Section 2, part of the Site falls within the Bloomsbury Conservation Area and can be viewed from certain areas of the wider Conservation Area setting. The Site is also located in close proximity to several listed buildings, including the Grade I listed Church of St. Pancras and the Grade II Listed The Place.
- 5.69 As such, careful consideration of the potential impacts of the Proposed Development has been afforded to both the appearance of the host building and to impacts upon its surrounding setting. A Heritage Statement ('HS') has been prepared by Wessex Archaeology, which forms part of the Planning Application submission.
- 5.70 The HS, assesses the Proposed Development against the known and potential heritage resource within the Site and the surrounding area, and assesses the likely impacts of the Proposed Development on this resource. The HS also assesses the verified view study undertaken by Foundation CGI, which provides viewpoints of the Proposed Development within the Bloomsbury Conservation Area.
- 5.71 The HS concludes that the Proposed Development, where visible from Sub Area 1 and Sub Area 13 of the Bloomsbury Conservation Area, would preserve and enhance the character and appearance of the Conservation Area by improving the condition of the extant building and enhance views to and from the Bloomsbury Conservation Area, reinforcing the delineation of the Conservation Area boundary.
- 5.72 Careful consideration has been given to the design, not only in terms of its aesthetic quality in relation to the host building and immediate vicinity, but also to the impact upon its wider setting, with particular regard to views from the Bloomsbury Conservation Area and other heritage assets within close proximity to the Site.
- 5.73 The HS concludes that the Proposed Development will be inter-visible with some heritage assets and will represent a change within their setting. Despite minor visual changes, the

Proposed Development will not alter the nature or character of the setting of any heritage assets. The proposed improvements to the elevations of the extant buildings will enhance views to and from the Bloomsbury Conversation Area. The Proposed Development will not cause harm to the character or appearance of the Conservation Area nor will it adversely alter the setting of any other heritage asset within the wider landscape.

- 5.74 The HS has established that there is an archaeological interest within the Site. However, substantial damage in the Second World War and subsequent redevelopment suggest the potential for archaeological remains to survive on the Site is low.
- 5.75 The Proposed Development has been sensitively designed to respect the character and setting of the Bloomsbury Conservation Area and setting of nearby Listed Buildings. As such, the Proposed Development is considered to comply with the NPPF, London Plan Policy 7.8 and LBC Local Plan Policy D2.

Transport, Access and Servicing

- 5.76 London Plan Policy 6.13 does not set maximum car parking standards for hotel development. In accordance with a PTAL rating of 6b, the provision of car parking should be consistent with the objectives to reduce congestion and traffic levels, and to avoid undermining walking, cycling or public transport.
- 5.77 LBC Local Plan Policy T1 outlines the Council's objectives to prioritise walking, cycling and public transport. Local Plan Policy T2 requires all new development in the Borough to operate as car-free, with the exception of disabled parking and parking required for essential operational needs, or whereby a retention of parking is agreed with LBC following a redevelopment of the site.
- 5.78 A Transport Statement ('TS') has been prepared by RGP and is submitted in support of this Planning Application. The TS states that the existing Site provides a total of 16 car parking spaces at lower ground level, including 3 reserved disabled parking spaces. The car park is accessed via a ramp from Duke's Road. There are also 4 designated car parking spaces for residents of Somerton House. As part of the Proposed Development, the level of on-site car parking would reduce by 11 spaces, to provide a remaining total of 5 spaces for hotel use, 4 of which would be reserved for disabled use only. The 4 residential spaces will also be retained. This reduction in on-site parking is considered to accord with current and emerging planning policy.
- 5.79 The existing Site does not provide any coach parking provision and does not generate coach activity. In light of the existing arrangements/demand, it is not considered necessary to provide any dedicated on-site coach parking facilities. The TS indicates that there would be no material

increase in taxi visits and therefore would continue to be undertaken as per existing arrangements, with drop off and pick ups being undertaken on Duke's Road.

- 5.80 Based on the London Plan minimum standards, the Proposed Development should provide a minimum of 17 cycle parking spaces, inclusive of both the hotel extension and restaurant. 22 secure cycle parking spaces are proposed as part of the Proposed Development comprising of 'Sheffield style' stands. This would comprise 5 new covered Sheffield style stands (with capacity for 10 bicycles) adjacent to Duke's Road and 6 new Sheffield style stands (with capacity for a further 12 bicycles) underneath the rear extension. The cycle provision therefore exceeds the minimum requirements set out within the London Plan.
- 5.81 The TS confirms that servicing and deliveries will continue to be accommodated on-site. Swept path assessment has been undertaken which demonstrates that a 12m rigid Whitbread delivery vehicle can access the service yard and egress the Site safely and conveniently in a forward gear back onto Duke's Road. The proposed increase in bedrooms would not generate an increase in frequency of linen deliveries, however improvements to the proposed restaurant would generate a slight increase in the food deliveries required. As such, a Delivery and Servicing Management Plan has been prepared by RGP and submitted as part of this Planning Application.
- 5.82 The TS concludes that:
- The Site has excellent access to sustainable guest travel, as demonstrated by its PTAL rating of 6b.
 - The proposed 66-bedroom extension would likely generate a single additional two-way vehicle movement during each of the AM and PM peak hour periods and a total of 17 additional two-way vehicle movements of the course of a typical day.
 - With consideration given to all modes, the proposed extension would generate in the region of 218 two-way movements over the course of a typical weekday, including 178 two-way trips via public transport modes and 19 two-way trips on foot.
 - The reduction in parking to retain only 5 bays would be adequate to cater for the operational needs of the Site and is in accordance with both LBC and London Plan parking policy.
 - The access arrangements associated with the existing Site would not be subject to alteration. The layout of the on-site service yard would be altered, although the size and frequency of delivery vehicles to the Site would remain unchanged post-development.

- 5.83 As such, the proposed increase in trip generation as a result of the hotel extension is not considered to represent a severe impact in traffic terms and as a result would have a negligible impact on the local highway network.
- 5.84 A Travel Plan has been prepared by RGP and submitted with the application and outlines measures which would be implemented to promote sustainable travel modes for journeys to and from the site by all site users. The Travel Plan has been prepared with regard to relevant guidance and has been assessed using TfL's ATTrBuTE assessment tool.
- 5.85 As a result, the scheme complies with the terms of NPPF, London Plan Policy 6.3 (Assessing Effects of Development on Transport Capacity), and LBC Local Plan Policy T1, T2 and T4.

Amenity

Noise

- 5.86 London Plan Policy 7.15 states that development proposals should seek to manage noise by avoiding significant adverse noise impacts and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.
- 5.87 LBC Local Plan Policy A4 seeks to ensure that noise and vibration is controlled and managed. LBC will only grant planning permission for noise generating development, including any plant and machinery, if it can operate without causing harm to amenity. Furthermore, the Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 5.88 A Noise Assessment has been prepared by WYG and is submitted as part of this Planning Application. The Noise Assessment confirms that the predominant baseline noise sources around the Site is road traffic noise from Euston Road and other surrounding roads with additional contributions from aircraft and localised plant noise.
- 5.89 A glazing and ventilation strategy has been provided which achieves both ventilation and internal ambient noise level requirements in all spaces of the Proposed Development.
- 5.90 Noise rating levels from the proposed building services plan have been predicted which shows noise emissions from the plant will result in predicted noise levels more than 10dB below the background noise level at the nearby existing noise sensitive receptors during daytime and night-time. External noise levels during daytime and night-time are predicted to be below the NOAEL criteria at all sensitive receptor locations. Therefore, the Proposed Development will not have a significant adverse impact on health, amenity or quality of life.

5.91 A Draft Construction Management Plan ('DCMP') has been prepared by WWA and submitted as part of this Planning Application. The DCMP provides details for the control of noise, dust and vibration derived from construction activities.

5.92 The Proposed Development complies with London Plan Policy 7.15 and LBC Local Plan Policy A4.

Daylight and Sunlight

5.93 London Plan Policy 7.6 states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential building, in relation to privacy and overshadowing.

5.94 LBC Local Plan Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours. As such, the Council will resist development that has a negative impact upon sunlight, daylight and overshadowing.

5.95 A Daylight and Sunlight Assessment has been prepared by CBRE and submitted as part of this Planning Application. The Assessment considers the potential effects of existing daylight and sunlight levels from the Proposed Development upon receptors on and around the Site.

5.96 The Daylight and Sunlight Assessment has been undertaken with reference to the methodologies set out within the Building Regulations Established Guidelines entitled "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011)" ('BRE Guidance').

5.97 Section 1.6 of the BRE Guidelines states that *"The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design"*.

5.98 As such, an appropriate level of flexibility needs to be applied when assessing the daylight and sunlight impacts of the Proposed Development. The Daylight and Sunlight Assessment concludes the following:

- Following the successful implementation of the Proposed Development, 87% of windows and 76% of rooms would achieve BRE compliance when considering the VSC and NSL methods of assessment. Of the windows and rooms assessed for APSH, 100% achieve BRE compliance.

5.99 As such, it is considered that the Proposed Development does not cause an unacceptable impact in relation of daylight and sunlight of neighbouring properties and accords with London Plan Policy 7.6 and LBC Local Plan Policy A1.

Drainage

5.100 The Site is located within Flood Zone 1 as confirmed by the Environmental Agency Flood Map which has the least probability of flooding.

5.101 A Surface Water Drainage Statement ('SWDS') has been prepared by Simpson and submitted as part of this Planning Application. The SWDS confirms that based on the Proposed Development it is considered appropriate to discharge surface water runoff into the existing on-site surface water drainage network and that a below ground storage tank would be the most appropriate form of SUDS to match greenfield run-off rates as closely as possible.

5.102 The SWDS concludes that surface water runoff from the development has been limited as far as practicable and at a significantly reduced rate compared to the existing scenario. On this basis, it is considered that the runoff volume would be discharged at a rate that does not adversely affect flood risk.

Sustainability

5.103 The hotel extension has been designed to meet the London Plan Policy 5.2 energy hierarchy of Be lean; Be clean; Be green. Following this hierarchy energy measures are intended to be implemented within the Proposed Development to reduce the energy use. The following measures are to be implemented within the Proposed Development:

- Building 'U' values improved beyond minimum standards imposed by Building Regulations 2013, with the following 'U' values being applicable:
 - Walls 0.15 W/m²K
 - Floor 0.15 W/m²K
 - Roof 0.10 W/m²K
 - Windows 1.00 W/m²K
- Thermal bridge interfaces all constructed to accredited details;
- Building air permeability of 5m³/m²h at 50Pa or lower;
- All lighting installed to be based on LED lamps, or low energy high frequency fluorescent where necessary;
- Mechanical ventilation and heat recovery;
- Natural Ventilation to circulation areas;
- Use of highest efficiency and best energy rating white goods; and
- Inverter control to all pumps and fan motors where appropriate.

- 5.104 LBC Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all development to meet the highest feasible environmental standards.
- 5.105 A Sustainable Energy Strategy Report ('SES') has been prepared by Jenks Associates Ltd and submitted with the Planning Application. The SES Report confirms that the proposed development would result in a carbon emissions saving of 16.8% above the requirements of Part L 2013 Building Regulations and an energy consumption saving of 13.9% above the requirements of Part L 2013 Building Regulations.
- 5.106 In trying to meet London Plan Policy 5.2 non-domestic building targets for a 35% improvement in carbon dioxide emissions reductions over the requirements of the 2013 Building Regulations, the SES Report proposes a select heat pump (heating only) low carbon technology for the development.
- 5.107 The proposed heat pump has an ErP rating of A+ and an SCoP of 3.54. The incorporation of this low carbon technology results in a Building Emissions Rate (BER) of 47.00kgCO₂/m² annum which achieves a 34.3% carbon emissions saving over Part L 2013 requirements.
- 5.108 In addition to the energy efficient Select Heat Pump installation the hotel will also have the following energy efficient measures installed: -
- Energy Efficient Lamps - energy efficient LED downlighters will be used throughout the bedroom extension.
 - Low Water Use Equipment - showers will be low flow showerheads around 8 l/min 6 litre. WC Cisterns will be dual flush with a 4.5 litre full flush.
 - Heat Recovery Ventilation - all bedrooms will be provided full fresh air / full exhaust air ventilation with heat recovery, operating in trickle mode when the room is unoccupied.
- 5.109 LBC Local Plan Policy CC2 expects non-domestic developments of 500sq. m of floorspace or above to achieve "Excellent" in BREEAM assessments and encouraging zero carbon in new developments from 2019.
- 5.110 A BREEAM Pre-Assessment has been prepared by Greengage and submitted as part of this Planning Application. The Assessment score that is targeted for the Proposed Development is 61.15%, which is equivalent to a BREEAM rating of 'Very Good'.
- 5.111 While not at an Excellent rating, the targeted score significantly exceeds the Very Good benchmark and represents a commitment to sustainable development that is feasible given the limitations of the Site as an extension to an existing operational hotel.

5.112 The Proposed Development has accordingly been designed to achieve the objectives of the NPPF in terms of sustainability and also Section 7 (Requiring Good Design). The proposal is also compliant with LBC Local Plan CC1 and CC2.

Ecology and Biodiversity

5.113 London Plan Policy 7.19 seeks development proposals to, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

5.114 LBC Local Plan Policy A3 states that the Council will grant planning permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species.

5.115 An Ecological Appraisal and a Bat Survey has been prepared by WYG and submitted as part of this Planning Application.

5.116 The Ecological Appraisal concludes that there would be no adverse impacts caused by the Proposed Development. The Bat Survey confirmed that features on Site are unlikely to support a bat roost and no suitable commuting and foraging habitats for bats were recorded during the survey, therefore no mitigation is required.

5.117 The Proposed Development is therefore considered to comply with the London Plan Policy 7.19 and LBC Local Plan Policy A3.

6.0 SUMMARY & CONCLUSIONS

6.1 This Supporting Planning Statement has been prepared by Barton Willmore LLP on behalf of Whitbread Group PLC to assess the planning issues arising from a planning application at the Premier Inn Hotel at Euston, 1 Duke's Road, WC1H 9PL.

Scheme Benefits

6.2 The Proposed Development represents a significant opportunity to deliver the following economic, social and environmental benefits to the Application Site and wider area, in particular:

- Help to deliver sustainable development in line with the NPPF and effectively use previously developed land for visitor accommodation, which supports the local and London's tourism industry;
- Increase amount of expenditure within the local area which will further enhance the local economy;
- Promote competition in the area that improves customer choice and a diverse offer;
- Conserve the character and appearance of the area by improving the appearance of the existing building.
- Maintain the existing employment of staff at the hotel. Additional jobs will be created during the construction period.
- Improve the overall commercial offer in the area to serve an identified demand within the Euston growth area;
- Development of sustainable and high quality design, representing an appropriate architectural response to the existing building and its surroundings; and
- Building upon the existing good level of transport and pedestrian accessibility.

Decision Making Approach

6.3 The NPPF forms a key consideration for the Planning Application alongside the Development Plan.

6.4 This Statement has demonstrated that the Proposed Development complies fully with the policy requirements of the adopted Development Plan.

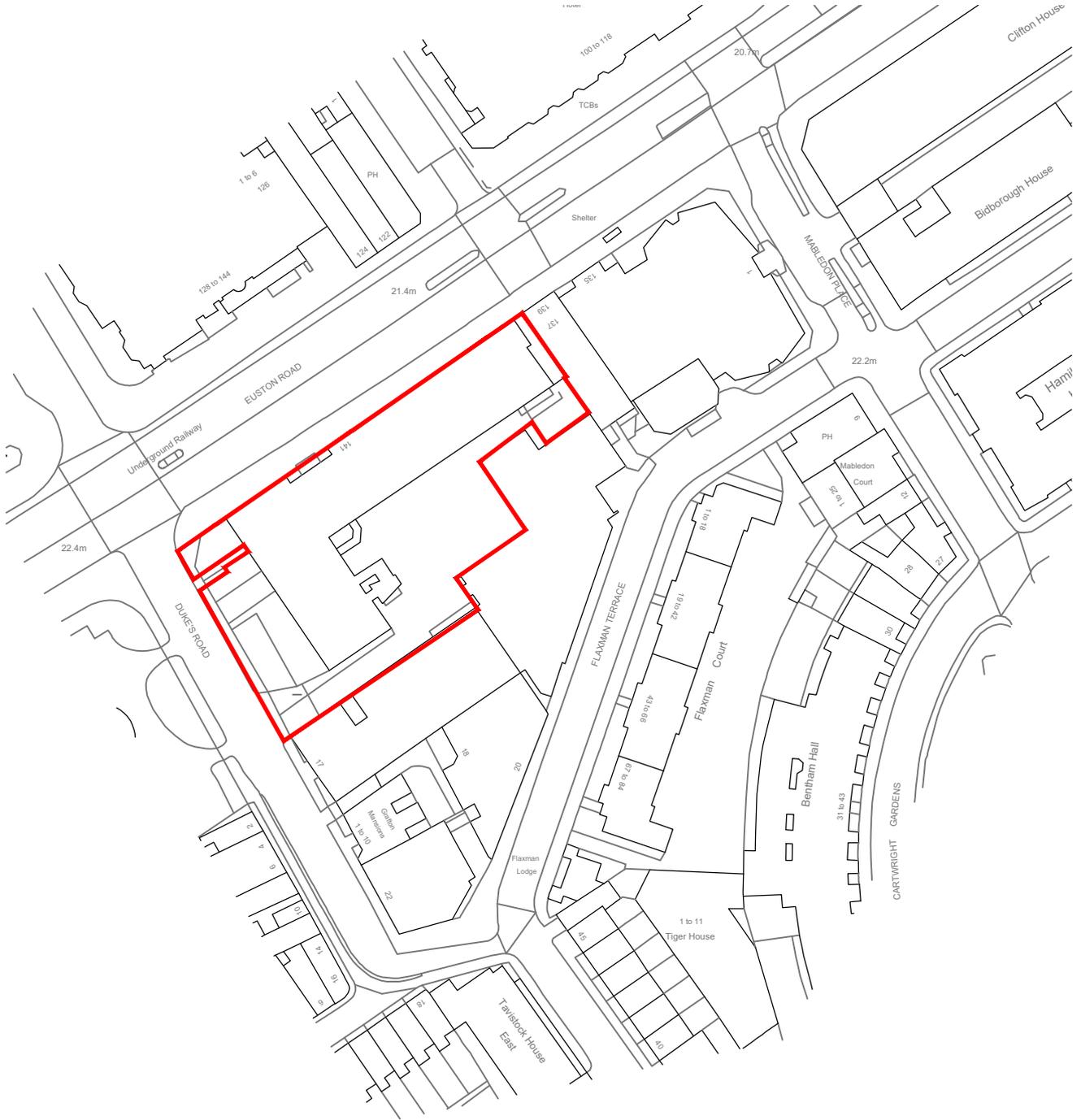
6.5 The Proposed Development also constitutes sustainable development and can thus benefit from the NPPF paragraph 11 presumption in favour unless any adverse impacts would significantly and demonstrably outweigh the benefits.

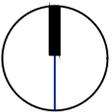
- 6.6 In the absence of overriding harm and taking into account the significant benefits arising, it is therefore entirely appropriate to grant Planning Permission for the Proposed Development.

Appendix 1

Location Plan

Application Site Area	0.31 Ha
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<p>NORTH</p> 	REV.	DESCRIPTION	DATE	INITIALS	 <p>CHQ Architects Ltd The Millings, 44 Whitehorse Street, Baldock, Hertfordshire SG7 6QQ</p> <p>Telephone: (01462) 895110 Email: design@chq-architects.co.uk www.chq-architects.co.uk</p> 	PROJECT	<p>Premier Inn 1 Duke's Road, London WC1H 9PJ</p>		DRAWING		
	<p>SCALE</p> 					ISSUE	<p>PLANNING</p>		<p>Site Location Plan</p>		
								DATE	March 2019	DRAWN	JW
								SCALE	1:1250@A4	CHECKED	
								<p>CHQ.15.11690-PL01</p>			