

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>		i) 09/09/2019 ii) 05/07/2019			
		N/A / attached		<b>Consultation Expiry Date:</b>		i) 11/08/2019 ii) 23/06/2019			
<b>Officer</b>				<b>Application Number(s)</b>					
John Diver				i) 2019/2766/P ii) 2019/2464/P					
<b>Application Address</b>				<b>Drawing Numbers</b>					
Imperial Hotel, 61- 66 Russell Square, WC1B 5BB & President Hotel, 56-60 Guildford Street, WC1N 1DB				See draft decisions					
<b>PO 3/4</b>		<b>Area Team Signature</b>		<b>C&amp;UD</b>		<b>Authorised Officer Signature</b>			
<b>Proposal(s)</b>									
i) 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)									
ii) 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)									
<b>Recommendation(s):</b>		i) Grant conditional permission subject to s106 legal agreement ii) Grant conditional permission							
<b>Application Type:</b>		(i)&(ii) Full Planning Permission							
<b>Conditions or Reasons for Refusal:</b>		Refer to Draft Decision Notices							
<b>Informatives:</b>									
<b>Consultations</b>									
<b>Summary of consultation</b>		i) Multiple site notices were erected around the site / local area on the 17/07/19 (expiry date 10/08/19). The application was also advertised in the local press on the 18/07/19 (expiry date 11/08/19).  ii) Multiple site notices were erected around the site / local area on the 28/05/19 (expiry date 21/06/19). The application was also advertised in the local press on the 30/05/19 (expiry date 23/06/19).							
<b>Adjoining Occupiers:</b>				No. of responses		00	No. of objections		00
<b>Summary of consultation responses:</b>		No responses were received in relation to either application.							
<b>Bloomsbury CAAC</b>		Following the issuing of letters requesting comments on both applications, to date, no responses were received.							

## Site Description

The application site relates to the servicing area/yard located within an inner lightwell / court yard that sits between two hotels within the Bloomsbury ward of the Borough. The development primarily relates to the Imperial Hotel, though some minor works are also proposed to the adjacent President Hotel. Both hotels are owned by the same private hotelier firm, though they operate separately.

The Imperial Hotel is a 10-storey building located on the eastern side of Russell Square. Outline planning consent was granted on 28<sup>th</sup> February 1966 for the erection of the hotel with basement parking with subsequent applications to complete the design of the hotel building. The architects of the building were C Lovett Gill & Partners and the building is considered not a true brutalist building but a building with brutalist-like features. The existing hotel building replaces the original Imperial Hotel building, which was designed by Charles Fitzroy Doll between 1905 and 1911. The original building was demolished in 1966.

The President hotel is a 8 storey building (plus basement) sited around the corner to the north of the Imperial, facing onto Guilford Street. It was constructed in a similar period as the Imperial but its elevational treatment blends some of the Brutalists-style elevational features with a more traditional design with predominantly brick with punctured window openings and mansard style roof extensions.

The site is located within the Central Activities Zone (CAZ) and within the designated Holborn growth area.

Neither application site is listed, however the buildings are located within the Bloomsbury Conservation Area. They are described within the Bloomsbury Conservation Area Appraisal and Management Strategy as a building that makes a neutral contribution to the wider conservation area. The buildings are located near to a variety of listed buildings that are listed below.

### Designated heritage assets in local vicinity:

#### *Buildings*

- Russell Hotel and attached railings with piers and lamps- Grade II\* (List UID: 1246152)
- Queen's Larder Public House- Grade II (List UID: 1139089)
- No. 2 Queens Square and attached railings- Grade II (List UID: 1139090)
- No. 6 Queens Square and attached railings- Grade II (List UID: 1139091)
- No. 7 Queens Square and attached railings- Grade II (List UID: 1139092)
- Nos. 13, 14 and 15 Queens Square and attached railings- Grade II (List UID: 1113278)
- No. 9 Cosmo Place- Grade II (List UID: 1235252)
- Nos. 52- 60 Russell Square and attached railings- Grade II (List UID: 1246150)
- Nos. 44-49 Russell Square and attached railings- Grade II (List UID: 1246149)
- Nos. 38-43 Russell Square and attached railings-Grade II (List UID: 1246148)
- Nos. 21-24 Russell Square and attached railings –Grade II (List UID: 1246375)

#### *Parks and Gardens*

- Russell Square- Grade II (List UID: 1000213)

Within the Bloomsbury Conservation Appraisal and Management Strategy, the hotels are described as such:

*“A number of building are deemed to make a neutral contribution to the area, but occupy significant sites, for instance the postwar Hotel President and the Imperial Hotel on the east side of Russell Square (which have strong architectural parallels with the Bedford Hotel on the west side of Southampton Row). Over time these hotel buildings have mellowed to the eye and arguably have become an established part of the townscape”.*

## Relevant History

**2019/2400/P-** Replacement of existing windows between second and eighth floor levels (inclusive) to all elevations (Use Class C1). **Granted 13/08/2019.**

**2019/2985/P** - Reconstruction of ninth-floor level and erection of tenth-floor extension following demolition of existing tenth-floor level plant room; installation of new shopfronts and pavement treatment at front elevation following demolition of existing front structure; revised treatment and

landscaping to internal entrance courtyard and associated alterations to hotel building (use C1). **Under determination.**

**2019/3017/A-** Display of 6x internally illuminated fascia signage to hotel building (use C1). **Under determination.**

## **Relevant policies**

### **National Planning Policy Framework 2019**

#### **The London Plan 2016**

#### **Draft New London Plan 2019 (Consolidated Suggested Changes Version)**

#### **Mayor's Supplementary Planning Guidance**

#### **Camden Local Plan 2017**

G1 (Delivery and location of growth)

E1 (Economic development)

E2 (Employment sites and premises)

E3 (Tourism)

A1 (Managing the impact of development)

A2 (Open space)

A4 (Noise and vibration)

D1 (Design)

D2 (Heritage)

CC1 (Climate change mitigation)

CC2 (Adapting to climate change)

CC4 (Air quality)

CC5 (Waste)

T1 (Prioritising walking, cycling and public transport)

T3 (Transport infrastructure)

T4 (Sustainable movement of goods and materials)

DM1 (Delivery and monitoring)

#### **Bloomsbury Conservation Area Appraisal and Management Strategy 2008**

## **Assessment**

### **1. Background**

1.1. The Imperial and President Hotels are privately owned and run hotels that has remained a major player in the Bloomsbury hotel sector ever since first opening in the 1960's. The hotels are both of large scale, and are major contributors to the visitor and tourist accommodation in the area. However, since first opening the hotels are yet to have received any comprehensive refurbishments and, as a consequence, offers facilities that are below what is generally expected of modern central London hotels. As a result, the owners intend to undertake a full and comprehensive scheme of refurbishment and extension to the hotels with the intention of upgrading it from 2\* to 4\* facilities.

### **2. Proposal**

2.1. As set out in the planning history, a number of applications have been submitted that cover different parts of the overall proposed scheme of works. This is because it is intended to phase development and so the owners had a preference for separating out mutually exclusive elements. These two applications relate solely to works to improve the servicing, power and HVAC facilities for both hotels, combined with replacement flues and escape stairs. As such planning permission is sought for the following works:

## 2.2. 'Super Plant' application - i) 2019/2766/P

- Demolition of the existing double height workshop canopy (between two hotels);
- Erection of replacement double height canopy above servicing area;
- Demolition of existing three storey servicing building (between two hotels); and
- Erection of replacement three storey building with reduced footprint to host all servicing equipment at ground floor level, combined with a total of no.10 hotel rooms at upper two floors (to the Imperial).

2.3. The reduction in footprint of the replacement building would facilitate the restoration of an area of courtyard that will link the lobby areas of the two hotels at ground floor level with an open air connection. The total area of demolition proposed is 597sqm, with the replacement building having an area of 537sqm. As such the development would result in a net reduction in overall floorspace of 60sqm.

## 2.4. 'Flues and grills' application - ii) 2019/2464/P

- Removal and replacement of no.6 flues to rear elevation of President Hotel;
- Removal of portion of front gantry to Russell Square frontage; and
- Installation of grills to section of ground floor frontage below area of removed gantry along Russell Square.

2.5. The ground floor grills are proposed in order to provide ventilation to the basement level UKPN substation. Whilst planning permission is not required for the replacement of the internal substation, the grills would represent an external change requiring permission. They would be installed at pavement level, though the section is within the applicant's ownership. The replacement flues to the rear courtyard would project between 1.3 – 3m above the level of the rear parapet of the President hotel and would vent the CHPs, boilers, kitchens and emergency generators for the hotels. The works to reprovide the substation have been developed alongside the UK Power Network, who have signed off all relevant drawings in accordance with their technical requirements.

## 3. **Assessment considerations**

3.1. The main issues for consideration are:

- Land use;
- Design and heritage;
- Neighbour amenity;
- Transport;
- Energy and sustainability;

## 4. **Land Use (i);**

4.1. Neither application would result in any net uplift in floor space across the site. As part of the super plant application (i), a net reduction of 60sqm is proposed. However, this reduction is formed from rationalisation and improvements to the existing site and servicing facilities and so this loss would not jeopardise the viability of either hotel use. This application would include the creation of a further 10 hotel rooms within the replacement building as part of the Imperial hotel. Given that this hotel features 383 rooms, this increase is considered minor and not to result in any issues in terms of increased level of activity on site. It is also noted that as part of the submitted application for rooftop extensions (ref. 2019/2985/P) would result in a net loss of 7 bedrooms from the hotel and so the new rooms hereby proposed are effectively displacements from within the main hotel building. The new rooms would include step free access via the main lift cores within the adjacent main hotel building. All rooms would feature a dedicated, openable window with clear aspects. The works are considered to remain in accordance with policy E3 Tourism.

4.2. There are no relevant land use considerations to consider as part of the flues applications (ii).

## 5. **Design and heritage (i & ii);**

### Super plant building (i)

5.1. The demolition of the existing canopy and servicing building is not objectionable in design grounds. These structures are of low quality and are a result of the gradual infilling of the original lightwell between the two hotels. As they are enclosed by the hotels to all sides (8-9 storeys) they are highly concealed, with public views only being afforded from the top of the servicing driveway to the north western corner of Queen

Square. In this view the proposed works would visually rationalise the somewhat cluttered existing appearance and improve the character of the premises. From within the hotel itself, the works would also be considered to enhance the character and appearance of the application site and to improve its quality for patrons via the replacement of an open-air courtyard / link between the lobbies of the adjacent hotels. The replacement building and canopy would reduce the bulk of the existing situation whilst also improving their visual appearance. Whilst these works are therefore supported, conditions are recommended to secure details relating to facing materials and landscaping to the new courtyard. Subject to these conditions, the works are considered to enhance the character of the application site, and to preserve the character and appearance of the wider conservation area. In light of their recessed setting and scale, these works would not impact the setting of any listed building, structure or open space.

#### Flues and grills (ii)

- 5.2. The location of the replacement flues has been carefully selected to minimise their visibility from outside of the application site. By routing the flues within the inside corner of the shared courtyards, the flues would be naturally screened from all views other than from within the hotel itself up to at least the ridge height of the hotel (8<sup>th</sup> storey). In order to ensure adequate dispersion rates, the terminus height of the flues would rise between 1.3 and 3m above the rear roof. However, given the height of the main building and the siting to its rear elevations, even where glimpses are afforded (i.e. from the upper floor windows of properties along Guildford Street) the flues would not be visually prominent or to result in visual clutter that might undermine the roofscape. From street level, it is not envisaged that the flues would be visible other than from selected positions within Queens Square (i.e. long view from north eastern corner). In this view the proposed flues would replace the existing large scale combined flue that currently projects immediately behind Alexandra House. Whilst the top few meters of the new flues may be visible in this view, these would be read within the views towards the rear of the hotels and so would not appear out of place, and would allow for the removal of the existing sizeable flue behind Alexandra House which currently impacts upon the setting of this building. Subject to a condition that the new flues shall not be used until such time as the existing, visually disrupting flue is removed and for the replacements to be painted a neutral tone, the works would overall improve the setting of this adjacent listed building and views from Queens Square itself.
- 5.3. To the front of the Imperial, works consist of the part removal of the existing front gantry structure and the installation of a metal grille below to provide cover and service to a UKPN substation at basement level. The removal of part of the front structure raises no objection from the Council in regards to its design and appearance. The existing structure is considered to detract from the hotel building and from the street scene experience at ground floor level to pedestrians and the expression of the refurbished original front elevation behind the structure is considered acceptable. It is also noted that work proposed under a separate application would also seek to carry out similar works to the rest of the gantry at street level (ref. 2019/2985/P) and that the two proposals fully align. The removal of part of the front gantry is to accommodate the installation of a metal grille to service an internal substation that will be developed within the basement of the hotel envelope. The principle of the grille at street level is considered acceptable as there are some examples of similar developments along this portion of Southampton Row/Russell Square. The grille has been designed to complement the tone of the surrounding pavement slabs and therefore does not create an impact upon the streetscene. A condition is however recommended for full details of the grill to be submitted and approved.
- 5.4. In light of the above, the combined works proposed are considered to remain suitably well designed and to improve the character and appearance of the application site and to preserve the character of the wider conservation area in accordance with policies D1 and D2.
- 5.5. Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013. It is also considered that the proposed development would preserve the openness and setting of the adjacent registered park as well as the setting of nearby listed buildings. Special regard has been attached to the desirability of preserving the setting of nearby listed buildings or structures or any features of special architectural or historic interest which it possesses, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

#### **6. Neighbour amenity (i & ii);**

- 6.1. Policies A1 and A4 of the Camden Local Plan seeks to ensure that the amenity of neighbouring occupiers and properties are protected. They state that planning permission will not be granted for development that causes harm to the amenity of neighbouring occupiers in terms of loss of daylight, sunlight, outlook, privacy, noise, vibration and odour.
- 6.2. The site is surrounded by commercial uses including retail (use A1), office (use B1a), restaurant (use A3) and drinking establishments (use A4). There are also educational and medical uses (both use D1) present around Russell Square and Queens Square to the rear. The nearest residential uses identified are located at the northern end of Queen Square (located approximately 80m to the east of the application site).
- 6.3. The proposed replacement canopy and super plant building would be of similar, or lesser scale than existing structures and are positioned in a recessed area of the site. As such these works would not result in any loss of outlook, natural light or privacy to any residential occupier (i). Similarly, the replacement flues and front alterations to form grills to the Russell Square frontage would not result in any loss of outlook, natural light or privacy to any residential occupier (ii).
- 6.4. In order to assess the result impacts of the combined works in terms of noise, vibration and odour, the applications were accompanied by full details of all plant equipment to be installed internally as well as a Noise and Vibration Impact assessment and odour risk assessments. These reports have sought to audit the existing situation, outline the proposed equipment/sources and then assess the resulting changes that would be experienced. This reporting has been reviewed by the Council's Environmental Health officers who conclude that neither proposal would result in detrimental impacts to any surrounding residential occupier. In order to ensure that the level of attenuation set out in these reports is achieved on site and to protect the amenity of the local area, they do however suggest conditions relating to:
- Maximum noise emissions cap (i & ii);
  - For plant equipment and ducts to be mounted on anti-vibration pads (i & ii);
  - For noise levels within hotel rooms to remain within noise standard specified in BS8233:2014 (i & ii)
- 6.5. In addition to the above, some concern is still retained that, owing to the limited site access, the construction phase of the super plant application could give rise to issues of disturbance for local residents if not properly controlled. As a result this application (i) would need to be subject to a s106 legal agreement to secure a full construction management plan prior to implementation. This will be discussed further in the following section. Subject to aforementioned conditions (i & ii) and s106 legal agreement (i), the proposed developments are considered to remain in accordance within policies A1 and A4.

## **7. Transport (i & ii);**

- 7.1. Neither proposed development would involve a net uplift in floorspace, meaning that in this instance there would be no need for additional cycle or car-free provisions to be secured. Full details of the resulting servicing and delivery requirements for the hotels have been provided in support of the applications. This confirms that the existing servicing arrangements can continue without impingement and that the level of servicing will not significantly increase. As mentioned above, the construction phase of the super plant development is considered potentially harmful unless closely managed. In this instance this application (i) would need to be subject to a s106 legal agreement to secure a full CMP to mitigate and avoid against any such detrimental impacts upon local highways conditions, pedestrian safety and local amenity. A monitoring fee would also be required in order to ensure that the CMP can be effectively monitored, reviewed and, if necessary, enforced against during the course of works. Owing to the difficult site access, constraints and issues of potential cumulative impacts, a contribution of £7,564.50 is required. This would be indicative of a 'medium impact site' in accordance with the adopted CMP Implementation Support Contribution levels.
- 7.2. In addition, as the second application would involve the installation of grills adjacent to the public footway, it would be necessary for the Council to secure a highways contribution to cover the costs of repair to this adjacent section of pavement in case of damage. The Council's highways engineers have been instructed to calculate the cost of such repairs. It is noted however that a highways contribution covering the cost of the repair of a larger extend of the same area of footway was secured under the associated application for rooftop works. As this contribution covered the cost of the repair of the same area, it is not necessary to require a second payment in this instance. Subject to this obligations, the works are considered to remain in accordance with policies T1, T2 and T3.

## **8. Energy and sustainability (i);**

- 8.1. As the super plant application would involve the demolition and replacement of a section of the hotel, an energy and sustainability statement has been prepared in support of the first application (i).
- 8.2. This report indicates that the energy strategy follows the energy hierarchy of 'be lean, be clean, be green'. The construction and materials of the build results in an efficient thermal envelope for the reduction of outward heat transmittance. At roof level, PV cells would provide onsite renewable energy and to reduce demand on the grid.
- 8.3. Following an initial review by the Council's Sustainability officers, the submitted Energy and Sustainability report were updated multiple times during negotiations. As a result, the development would now result in a 22.4% reduction in CO2 emissions below Part L of Building Regulations, which is in excess of the 20% policy target. Whilst the BREEAM score for the new building would not meet 'Excellent' rating due to the constraints of the existing building, a commitment to achieving 'Very Good' has been made. The Council's Sustainability officers conclude that the applicants and adequately justified all shortcomings and that the overall offer would remain policy compliant. Overall, in sustainability and energy considerations, this is considered acceptable. This is as suitable renewable and sustainable elements have been incorporated into the design and construction. A condition would be attached upon approval to secure details of the PV cells as well as a condition that the design and construction of the development is carried out in accordance with the submitted energy and sustainability statement. This is to ensure that the sustainable measures proposed are developed accordingly.
- 8.4. In addition, an air quality assessment was also submitted in relation to this application to test the potential impacts of the development upon local conditions. This concludes that the primary risk to increased local air quality arising from the development would be from the construction phase of development. As such as part of the CMP to be secured there will be a requirement for air quality monitoring and dust suppression measures to be used throughout the build. Though the dispersion of the emissions from the back up generator have not been provided at this stage, it is noted that the generator would operate in emergencies only and so would not result in a worsening of local air quality other than in the event of a major power failure, which would remain short term if it were to occur.
- 8.5. In light of the above the proposed development is considered to remain in accordance with policies CC1, CC2, and CC4 of the Local Plan.
- 8.6. As the flues and grills application would not involve any changes of use or creation of new floorspace, there was no requirements for an energy or sustainability statement (ii).

## **9. Recommendations:**

- 9.1. (i) Grant conditional planning permission subject to s106 legal agreement.
- 9.2. (ii) Grant conditional planning permission
- 9.3. Legal agreement heads of terms to include:
  - Construction management plan plus monitoring fee (£7,564.50) (i)