

Delegated Report		Analysis sheet		Expiry Date: 05/08/2019		
		N/A		Consultation Expiry Date: 14/07/2019		
Officer			Application Numbers			
John Diver			2019/2985/P			
Application Address			Drawing Numbers			
Imperial Hotel 61-66 Russell Square London WC1 5BB			Refer to draft decision notice			
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature			
Proposal(s)						
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)						
Recommendation:		Grant Conditional Permission subject to S106 Agreement				
Application Type:		Full Planning Permission				
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice				
Informatives:						
Consultations						
Adjoining Occupiers:			No. of responses	00	No. of objections	00
Summary of consultation responses:		Multiple site notices were displayed in a considerable radius to the site from 14/06/2019 (expiring on 08/07/2019) and a press noticed was displayed in the local press from 13/06/2019 (expiring on 20/06/2019). To date, no objections have been received.				
External Consultees, Conservation Area Advisory Committees/ Other societies		As the proposed development is located at a height of more than 30.0m in height, the application was referred to the Greater London Authority (GLA) to consider any potential strategic London-wide planning issues. The GLA responded that the proposal does not give rise to any new strategic planning issues. As such, the Council is not required to consult the				

	<p>GLA further on this application. Any decision notice and S106 legal agreement should be sent to the GLA.</p> <p>The Bloomsbury CAAC were formally consulted. To date, no response has been received.</p> <p>The Bloomsbury Association were formally consulted. To date, no response has been received.</p>
--	--

Site Description

The site comprises of a 10-storey hotel located on the eastern side of Russell Square. Outline planning consent was granted on 28th 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 building is constructed of steel framing and structure, with brick and concrete panels and forms an asymmetrical “T” shape with a curved rear projection that backs onto Queen Square. The front elevation of the building consists mainly of horizontal concrete bands that follows the rhythm of the angled windows across the building. At the top of the building, there is a holding room for the hotel plant and lift overruns which is set back away from the front elevation of the building and follows the curved rear wing. This existing “eleventh” storey cannot be viewed from either Russell Square at the front, or Queens Square at the rear.

At ninth-floor level (10th storey of the building) the appearance of the horizontal band and windows are flush. At a portion of the building at ground to sixth floor level, the concrete bands are flush (the windows are still angled) which is positioned above the entrance from Russell Square into the courtyard where the main reception and entrance is located. At ground, first and ninth floor level, these horizontal bands feature gold vertical strips. The second storey (first floor level) of the hotel building has a larger and vertically elaborated window design. The gold elements that are within the horizontal banding on some levels are seen within the fenestration at first floor level.

At ground floor level, there are retail units and an ancillary restaurant/bar, which consists of a single-storey front conservatory style extension. The restaurant/bar has both an internal connection to the hotel building as well as access from the public highway. The main entrance to the hotel is accessed via a central courtyard within the site. The upper floors of the building consists of hotel suites, staff quarters and offices, meeting rooms and the hotel restaurant and bar.

The site is located within the Central Activities Zone (CAZ), although it is not located within a designated frontage, town centre or local area as designated within Camden Planning Guidance (CPG) Town Centres.

The building is located within the Bloomsbury Conservation Area and it is not a listed building. It is described within the Bloomsbury Conservation Area Appraisal and Management Strategy as a building that makes a neutral contribution to the wider conservation area. The building is 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 Imperial Hotel is 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.**

2019/2464/P- 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). **Under determination.**

2019/2766/P- 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). **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)

H2 (Maximising the supply of self-contained housing from mixed use schemes)

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)

D3 (Shopfronts)

CC1 (Climate change mitigation)

CC2 (Adapting to climate change)

CC4 (Air quality)

CC5 (Waste)

T1 (Prioritising walking, cycling and public transport)

T2 (Parking and car-free development)
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 Hotel is a privately owned and run hotel that has remained a major player in the Bloomsbury hotel sector ever since it first opened in the 1960's. The hotel is of large scale, offering 382 rooms at present and so is a major contributor to the visitor and tourist accommodation in the area. As well as the rooms, the hotel also features a number of ancillary internal uses such a hotel bars, restaurants and conference / meeting rooms. However, since its first opening the hotel is 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 hotel with the intention of upgrading it from a 2* to a 4* facility.

2. Proposal

2.1 The proposed refurbishment includes rationalisation of layouts, improvements to rooms and facilities, repositioning of uses within the building as well as extensions to the building at roof level. Existing guest facilities such as the lounge, restaurant, bar and conferencing suites would be relocated from their existing position on the first floor to the replacement rooftop storeys, with the first floor to be converted to hotel bedrooms. The works would see an overall net reduction in hotel beds of 7 (resulting total 375). The additional facilities would remain ancillary to the main hotel use (C1) and would fall within the same planning unit / continue to be operated as a single entity. In light of this, no changes of use are proposed as part of this application and the internal alterations shown on plans would not require express planning consent.

2.2 As such, planning permission is sought for the following external alterations and extensions to the host building (grouped by areas of work):

- 1) (Roof alterations) Demolition of existing top floor (10th) hosting roof plant; increasing the height of existing 9th floor (by 0.9m) and replacement of additional storey above (10th) with set back and roof terraces to both wings. These top two storeys would contain the reprovided hotel lounge and bar, restaurant and conferencing and meeting room facilities.
- 2) (Street frontage improvements) Demolition of projecting raised platforms to Russell square frontage at street level; replacement of glazed frontage with feature columns and lighting at street level to restore original building line and increase footway below canopy. Creation of new entrances and shopfronts.
- 3) (Elevational alterations) In a bid to improve the amenity standards of hotel rooms that face into the rear courtyard, windows within the rear elevation of the front wing (north east elevation) and the side elevation of the rear wing (south eastern elevation) would all be enlarged and replaced. The new windows would feature larger areas of glazing as well as openable picture windows with mesh guard rails. At ground floor level the reception entrance would also be overhauled in the same design approach as the Russell square frontage. The Russell Square façade (south west) would be repaired and cleaned but otherwise remain in its original state between 2nd and 8th floor levels.
- 4) (New lift core) A further extension to provide a new lift core would project off the north western elevation that faces into the rear service yard. This lift would serve all floors

between GF and 9th floor levels. The lift shaft would project by 2.3m and have a width of 2.2m.

- 5) (Courtyard landscaping) Revised treatment to internal courtyard elevation and replacement hard landscaping. Within the entrance courtyard, the proposed hardstanding materials include new paving, edging and conservation style kerbs. This would result in a newly surfaced vehicle drop off point around the existing courtyard fountain

2.3 In relation to the roof top works proposed (1), the ninth-floor level at the front elevation would increase by 0.9m (as measured externally) which would result in the existing building increasing in the maximum terminating height to 33.9m from ground level (existing 33.0m). The 10th floor roof extension above would be set back from the front and rear roof edges of either wing so as to reduce its visual impact. To the front wing, the extension would have a height of 3.6m and to the rear wing 5m. The maximum terminating height of the building would therefore be increased to 39m. Overall, the works would result in an uplift of 297sqm of new floorspace.

3. Assessment considerations

3.1 The main issues for consideration are:

- Land use;
- Design and heritage;
- Neighbour amenity;
- Transport;
- Energy and sustainability;
- Economic development;
- Community Infrastructure Levy (CIL);
- Planning obligations.

4. Land Use

Hotel uplift (C1)

4.1 The proposed uses such as the new lounge bar, restaurant and conference meeting rooms within the refurbished and extended floorspace are considered not to be new separate uses but ancillary uses within the existing hotel (C1) use. The main operation of the building is to provide hotel accommodation to guests and the new operations proposed as a result of the development are minor in scale and usage in comparison to the provision of hotel rooms and are provided within the hotel envelope. The replacement facilities proposed are typical ancillary uses of hotel buildings. As discussed the works would therefore not involve any change of use. The proposed uplift of hotel floorspace would increase the sustainability and viability of an existing and established hotel within a highly accessible location in the heart of Bloomsbury. As such the proposed uplift is acceptable in principle.

Mixed use development / housing (C3)

4.2 Policy H2 of the Camden Local Plan states that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the

supply of housing. In the Central London area where more than 200sqm (gross) additional floorspace is provided, it is expected that 50% of all additional floorspace is to be housing. However, the policy also states that where the inclusion of housing is not appropriate for the area and cannot be practically achieved on site such a contribution may not be sought. There is a number of criteria listed in policy H2 used to inform whether a mix of uses should be sought. They are as follows:

- 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 of the Local Plan gives to the jewellery sector in the Hatton Garden area (not applicable in this proposal);
- 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.

4.3 As the physical uplift of floorspace proposed is 297sqm, the development meets the threshold to assess if the incorporation of residential use should be sought in line with criteria a-e as listed in the previous paragraph. Should the assessment conclude that the mix of a residential use within the proposed scheme concludes that housing is not required or suited, then the housing provision would no longer be required (including off-site provision and payment in lieu). Based on an overall uplift of 297sqm, this policy sets an expectation for the delivery of 148.5sqm of residential floorspace. This would provide around 2x residential units (2/3 bedrooms).

a) Character of the development, the site and the area.

4.4 It is not uncommon for hotel (use C1) and residential uses (use C3) to be compatible uses within a site and can co-exist. Furthermore, the wider Bloomsbury area is an example of an area that is mixed in its character and uses with the compatibility of residential and commercial uses together within single sites. However, given that adopted guidance requires all new residential accommodation to remain self-contained and independent, provision within the main floors of the hotel (i.e. GF – 8th) would remain unfeasible. It would require occupiers of residential flats to share cores, access and circulation routes with hotel guests and would not be workable as there would be no way to separate out units at these floors.

4.5 The character of the proposed development at ninth and tenth floor level would be of a typical shared/public area of a hotel with a lounge bar, restaurant and dining and conference rooms. The proposed works seek to isolate such uses to these floors, meaning that the main floors below can be rationalised for hotel rooms and noise and activity from these areas are separated from the hotel rooms below.

4.6 The Imperial Hotel operates 24 hours a day, fairly intensively given its scale and resulting number of patrons. The top floors will host much of the busier spaces within the hotel, including provision for bars and restaurants that will remain open until late and see a heavy and frequent footfall of guests, as well as continuous servicing activities to the site (deliveries, maintenance, cleaning etc.). In consideration of the existing day-to-day operation of the hotel, it would seem inappropriate to provide this small amount of residential floorspace within a large development that has continuous 24-hour activity all across the site, particularly during the night-time period. It would be expected that the proposed residential use would hinder the existing character of the hotel building and vice versa.

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

4.7 Though the existing building is of large scale, in order to secure on site provision, such housing would be expected to have a separate entrance and access, which would mean additional floorspace would need to be provided to accommodate potential stair cores, internal corridors and

lifts. This would either result in a reduction of either the proposed uplift or the existing floorspace of the hotel building. Should the floorspace to accommodate this be found from the proposed uplift, this would result in less floorspace being used for the hotel extension. This could be considered self-defeating as the resulting floorspace would make the lounge bar and dining unviable.

4.8 The proposed physical uplift of floorspace of 297sqm is in response to the Council's considerations on scale, bulk and its impact on the conservation area (please refer to section 3.0), and as such, more built mass would not be considered acceptable in design terms and cannot be developed to meet the Council's needs of policy H2. Within their submission, the applicant has used various proposed examples of allocating residential floorspace within the site. This is to demonstrate that the inclusion of residential floorspace cannot be practically achieved.

4.9 The first proposed location of residential was within the entrance courtyard where it was demonstrated that the proposed housing would not have adequate access to outlook, daylight and sunlight and that there would be direct overlooking from the hotel room windows. Future residential occupiers would also experience noise and fumes from vehicles accessing the courtyard for drop off, pick-ups and deliveries. The access would not be independent as it would take place via the entrance, courtyard and building. Furthermore, the operation of the hotel would be hindered as the proposed residential would obstruct access to guests and deliveries. Should the floorspace be raised to mitigate this, this would obstruct amenities experienced by the existing upper floor hotel room windows.

4.10 The second proposed location within the site is in the service yard located at the rear of the building. The amenity of the proposed residential floorspace would experience very poor amenity in regards to light, outlook, noise and fumes as well as noise from the hotel mechanical plant. Potential noise complaints from future residents would impede on the operation of the hotel. There is also no direct access to the public highway and as such, access to the proposed residential units would not be independent from the hotel.

4.11 The third proposed location is the existing hotel accommodation within the rear wing of the building. As the rear wing is located by the service yard, the same amenity concerns would arise as detailed within the previous paragraph as well as operational hindrance to the hotel. This would also lead to a decrease of hotel rooms which would result in a loss of revenue and business to the hotel. There is a regrettable minor loss of hotel rooms proposed in order to accommodate the development and a further loss of rooms and/or floorspace could lead to more loss of revenue, undermining the proposed development in turn.

4.12 The fourth location explored was the roof and the proposed development itself. The applicant argues that should residential be incorporated there, future occupiers would experience noise and general disturbance from the proposed operation and use of the lounge bar and restaurant. Access to the residential floorspace would be via the stair core/lift of the hotel building resulting in no independent access and conflict with the day-to-day operation of the hotel including fire and safety procedures. The applicant also argues that to provide residential and a suitable amount of extended hotel space required would increase the bulk of the extension further that would be contrary to the design policies of the Local Plan. The other option to accommodate the residential within the proposed envelope of the development would result in insufficient floorspace remaining to accommodate the proposed development, rendering the scheme unviable.

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

4.13 Not applicable in this proposal as the site is not located within 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.

4.14 As explained previously, the proposed residential accommodation is considered to not be compatible with the character and operational requirements of the proposed non-residential use (hotel extension). This is due to the fact that the proposed residential accommodation would have to share the same access as the hotel guests or services. The operations of the proposed

extension (lounge and restaurant) would be considered to impact on the amenity of the future residential occupiers, particularly during evenings and weekends when it is anticipated the proposed extension would have the most patronage and the proposed residential would most likely be used. The extension would be likely to be serviced and operated in a 24-hour manner in the same way as the hotel building even if not open to guests and patrons 24 hours a day.

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

4.15 This does not apply to this development as it is not publicly funded or serve a general public purpose.

4.16 As such, it has been demonstrated that the provision of residential floorspace in this development would be illogical for a number of site constraint and operational reasons. As these reasons have been demonstrated sufficiently, it is considered that the provision of 50% of the additional floorspace should not be allocated as residential and the requirement for housing is not applicable for this scheme. Therefore, the proposed development complies with policy H2 of the Local Plan and in regards to overall land use.

5. Design and conservation

5.1 The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should consider the character, setting, context and the form and scale of the neighbouring buildings, and the quality of materials to be used. Within areas of distinctive character or adjacent to one, it is considered development should reinforce those elements which contribute to and create the character in line with policy D2.

5.2 Supplementary to the above, the Bloomsbury Conservation Area Appraisal and Management Strategy states that "*Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area*" and that "*High quality design and high quality execution will be required of all new development at all scales*". As part of the execution of high quality design, the Management Strategy goes on to read "*In all cases the Council will expect original architectural features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair*".

5.3 As the rooftop extension would be located on a building that is over 30m in height, the application was referred to the GLA. This was namely for them to assess whether the development would impact upon London-wide views. In addition, the application was referred to the Council's external Design Review Panel (DRP) due to the sensitive location of the development adjacent to a number of listed buildings, a listed park and being viewed in longer local and London-wide views.

5.4 The existing context of Russell Square is of a variety of architectural styles and ages. Along the southern and western side of the square are rows of terraced Georgian buildings between three and four storeys. Along the north side, there are examples of Georgian and 20th century architecture. Along the eastern side, the diverse range of architecture is emphasised between the late Victorian architecture of the Russell Hotel and the post war developments of the Hotel President and the Imperial Hotel.

5.5 In regards to scale, the Imperial Hotel and Russell Hotel are the tallest and largest buildings within the Russell Square vicinity

5.6 The central and focal point of the existing context is Russell Square, a grade II listed park and garden that provides green and open space within a heavily built up area of Central London. From the square, all the buildings as described in the previous paragraphs are viewed to some extent. Due to the extent of Russell Square and the wide roads that surround it, it is considered that not only is the vicinity a mixed character of architectural styles but also an open character where the buildings can be seen wholly.

Rooftop extension

Scale, bulk, massing and position

- 5.7 CPG Design specifies that all extensions should be secondary and subordinate to the building being extended. Specifically in regards to roof developments, it advises that additional storeys are likely to be acceptable where good quality materials and details are used; and the visual prominence, scale and bulk would be appropriate having regard to the local context; and where alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form.
- 5.8 The subject building is ten-storey post-war “brutalist-like” building with a brick and concrete cladding exterior. The scale of the hotel building is considered heavy, bulky and large and it occupies a wide plot along the eastern side of Russell Square. The height of the building is also grand, being one of the tallest buildings in the vicinity.
- 5.9 In this instance, due to the characteristics of the building in terms of its scale it is considered that the proposed extension would not overwhelm the hotel building and that the existing roof of the building can accommodate the extension. Furthermore, the proposed extension would be set back from the front elevation of the building by 5.0m and as such, the bulk of the extension, its relationship to the building and the way it adjoins it would not be readily seen in most views of the building. The only view that would demonstrate this is when on the tenth-floor level.
- 5.10 The height of the new extension measured from the front would be 3.6m and single storey which is considered an appropriate height in conjunction with its bulk and set back from the front elevation. Overall, the extension is considered to sit respectfully and sympathetically atop the building.
- 5.11 Along the rear wing, the height would be increased by 1.2m from the previous terminating height of 3.9 (from the existing roof level) to 5.1m. The increase of the height along the rear wing is considered acceptable given that it would only be visible in wider views (as discussed below) and when entering the entrance courtyard of the hotel which has an existing enclosed character. Additionally, although the tallest building in the vicinity, the building is surrounded by dense development (around the rear) in which the increase of the hotel building is considered to not make a detrimental impact on this existing character. The bulk of the extensions along the rear wing of the hotel building would be approximately the same as the previous plant room and the remaining space on the roof would be formed into a rear amenity terrace. As such, the scale of the proposal along the rear wing is acceptable as there is no considerable change from the existing built form.
- 5.12 As such, the proposed rooftop extensions are considered secondary to the building being extended and would comply with the Council’s general principles on extensions. The DRP responded that they support the bulk, scale and massing of the proposed roof extension. This is in conjunction with the minor increase of the ninth-floor level.

Detailed design

- 5.13 The proposed roof form of the extensions are of a folded plate design which would appear as waves when viewed from the terrace of the tenth-floor level, as well as from views in Russell Square and longer views from the upper levels of taller buildings in the wider area with the Senate Building being a nearby notable example. The form of the roof is considered appropriate and interesting which provides a strong visual connection to the detailed design of the front elevation of the existing hotel building which features folded waved detailing with the concrete panels between the second and eight floors. The glazing detail at the front elevation is considered acceptable although this would not be appreciated fully unless on the tenth-floor level. The glazing arrangement and form of the extension is also reflected at the rear elevation.
- 5.14 The extension along the rear wing also has a folded waved form and as is slightly higher than the extension along the building core. The two roof forms appear to follow one another in their

pitches from north to south. The relationship between the two roofs and the relationship and the connection between the front and rear part of the extensions are considered acceptable. This relationship would not be seen unless in longer views from the upper floors of nearby buildings across the square such as the Senate Building.

- 5.15 The double height detail of the ninth and tenth-floor levels when viewed from the entrance courtyard is considered acceptable as this would not be visible from the mainly public views of Russell Square and is considered to provide an improvement and some interest to this elevation which contains the main hotel entrance at ground floor level). The use of brise soleil to provide shading and comfort to the proposed restaurant users is an appropriate design function for the exterior as well.
- 5.16 The brise soleil would not be featured on the north-western elevation (the rear wing) and as such a simpler design with the panelling, glazing and cladding would be formed which is considered appropriate.
- 5.17 At the rear of the wing the detailed design of the extension matches that of the front elevation of the extension along the building core. As such, there is no objection to this design at the rear.
- 5.18 The proposed material palette for the roof extensions are considered appropriate and provide some connection or relationship to the existing material palette of the existing hotel building. The DRP commented that the proposed materials should be as “honest” as the material palette of the building. It was recommended that perhaps lightweight materials should be proposed resulting in a lightweight structure atop of the hotel building.
- 5.19 Upon further review of the proposed materials, the Council considers that the material choice is “honest” to the host building given its steel framing and concrete panelling. The building is considered to be “brutalist-like” or does not have the characteristics for it to be considered a wholly Brutalist building, in which concrete would have been used for the structure instead of steel framing clad in concrete panels. As the extension is simply taking the core material elements (steel frame and concrete panels) from the existing building and incorporating that into the material choice and design of the tenth-floor extension, the Council has no objection to this.
- 5.20 The use of glazing for the front, side and rear elevations is considered acceptable as are the metal cladding and aluminium brise soleil. Upon approval, conditions would be attached to secure further details including material samples of the of the proposed materials of the tenth-floor extension to ensure the proposed materials are of a high quality and sit well with the existing materials of the hotel building.
- 5.21 Further details of the proposed materials including samples will be attached upon approval. This is to ensure that the materiality of the shopfronts would be of a high quality design that does not detract from the character and appearance of the wider conservation area.

Ninth-floor reconstruction

Scale, bulk and mass

- 5.22 The increase of the height of the ninth-floor level by 0.9m (externally) is acceptable given the large massing of the existing building. Given the tall and large built form of the existing building, the increase is considered to be marginal and although it would be seen in direct views, would not be that noticeable. Only the height is being increased and the ninth-floor is not being widened or deepened from its existing perimeters.

Detailed design/proposed materials

- 5.23 To the front elevation, the detailed design of the reconstructed ninth-floor level follows the rhythm of the vertical bands of the floors below. The elevation is punctuated at intervals by the fins of the metallic cladding frame that surrounds the proposed windows. The fins correlate with the proportions of the building and the folded concrete bands. Each end would feature matching

brickwork following the design of the rest of the hotel building below. The proportions of new windows and balconies also sit well with the rest of the elevations. A new concrete panel band with inset gold mosaic detail would complete the reconstructed floor. Its heavy appearance and detailed design that draws on the gold elements in the vertical bands below is considered an appropriate design element that terminates the height of the building's core and overall responds to the age and style of the hotel building.

- 5.24 At the rear of the building core and the rear of the rear wing at ninth-floor level, the detailed design as seen along the front elevation (at ninth-floor level) is reflected. The detailed design of the brickwork framing the windows and metal bandings is acceptable.
- 5.25 Further details of the proposed materials including samples will be attached upon approval. This is to ensure that the materiality would be of a high quality design that does not detract from the character and appearance of the wider conservation area.

London and Local Views

London-wide views

- 5.26 The hotel building is identified as being within designated London panoramas from Primrose Hill to Greenwich Park, as described in the London Plan and its supplementary planning guidance (London View Management Framework).
- 5.27 Within the application submission, it has been demonstrated that the proposal does not affect these views from either Primrose Hill or Greenwich Park. In particular, a development within the City of London would block the proposed scheme in views from Greenwich Park. As discussed in paragraph 3.3, the application was referred to the GLA. No objection was received on the proposed scheme with no further requirement for referral once a decision by the Council is made. As such, it is considered that the proposal does not affect upon London-wide views.

Local Views

- 5.28 The hotel building appears in views as identified within the Bloomsbury Conservation Area Appraisal and Management Strategy. These are: from the centre of Russell Square, the south side of Russell Square, the north-east corner of Queens Square (looking west), from the western side of Southampton Row (looking north) and from the junction of Russell Square and Woburn Place (looking south).
- 5.29 *Centre of Russell Square:* Due to the set back of the roof extension from the front elevation of the building core, views from this point would be of the front elevation of the hotel building with the roofline of the extension above it visible. Due to the angle and positioning of the roofline in relation to the centre of Russell Square and the use of concrete panelling for the roofline of the extension, the proposed extension would be seen as marginal increase of height from top horizontal band of the building's façade. The existing plant room can viewed from this angle and it is considered that the proposal in its appearance is a continuation of the front elevation and would not have a significant impact on this view in which the hotel is a background to Russell Square. During the summer, views would be obscured by the matured trees.
- 5.30 *South side of Russell Square:* From this view, the existing bulk and mass of the building can be appreciated due to the width of the road and framed between the trees of Russell Square to the left and the Georgian terrace to the right. This provides openness to the character of this part of the conservation area (and the view). The proposal would result in views of the proposed roof form and the top of the columns of the extension. It is considered that as a result of the development, this view and setting of the conservation area would not be impacted as the open character observed would still be retained.
- 5.31 *Queens Square:* The proposed elevation drawings, sections and photomontages demonstrates that the proposal would not be visible from Queens Square.

- 5.32 *Southampton Row*: The existing view from this point is of the buildings of the eastern side of Southampton Row which although not listed are positive contributors to the conservation area. The flank wall of the hotel building provides a backdrop to these buildings with the roofline of the hotel building and its neighbours in the foreground being clearly read as well as its relationship (the hotel building being the larger building). Further, behind the Imperial Hotel, the roofline of the Russell Hotel can be seen.
- 5.33 The flank wall of the extension would be visible from this view as a result of the proposal; however, due to the set back of the extension, it is not dominating or make the building loom in its appearance. The roofline of the neighbouring buildings and the Russell Hotel can still be appreciated in this view. Furthermore, the relationship of the Imperial Hotel being the tallest building in comparison to its neighbours in the foreground is maintained without it being exacerbated by the additional height from the extension. As such, the setting of this part of the conservation area is not negatively impacted by the proposal.
- 5.34 *Woburn Place*: In the foreground from this vantage point, is the Russell Hotel which looms with the north east corner of Russell Square viewed to the centre and right hand side. The Imperial Hotel is in the background rising up behind the President Hotel providing the relationship of scale between these two neighbouring hotels.
- 5.35 As a result of the proposal, the proposed flank wall of the extension would be visible maintaining this relationship between the Imperial and President without it being exacerbated in this view. The view (and therefore) setting of the Russell Hotel and the Russell Square in the foreground is considered to not be impacted as a result of the proposal.
- 5.36 Overall, it is considered that the proposed roof extension would not cause harm to local views within the Bloomsbury Conservation Area.

Ground floor alterations/proposed shopfronts

- 5.37 At ground floor level, the existing front gantry would be removed which is welcomed by the Council. This existing structure is considered to detract from the overall appearance of the hotel building and is a detracting feature from the street scene. As a result of the removal of the gantry, the front elevation of the building at ground floor level would return to its original form.
- 5.38 Further alterations to the front elevation at ground floor level include the installation of new shopfronts across the building's width (apart from the entrance access). The shopfronts would have metal fins and framing with glazing that replicates the design of the tenth floor extension above.
- 5.39 The DRP responded that the proposed shopfronts do not need to be of the same design as the rooftop extensions as they will be responding to two different contextual situations. While the Council acknowledges this, it is considered that whilst the shopfronts and extensions would not be read within the same view, the design of both responds well to both contexts at both ground floor and tenth floor levels. The proposed shopfronts are considered contemporary and appropriate and are an addition that are sympathetic to the age and style of the building.
- 5.40 Further details of the proposed materials including samples will be attached upon approval. This is to ensure that the materiality of the shopfronts would be of a high quality design that does not detract from the character and appearance of the wider conservation area.
- 5.41 In light of the above, the works would preserve the character and appearance of the host building and that of the wider conservation area. 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

- 6.1 Policy A1 of the Camden Local Plan seeks to ensure that the amenity of neighbouring occupiers and properties are protected. It states 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 and in some instances 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 at the front of the site and Queen Square to the rear of the site. The nearest residential uses identified are located in Queen Court at the northern end of Queen Square (located approximately 80m to the east of the application site).
- 6.3 Due to the minimal physical scale of the ground floor front elevation works and the alterations to the courtyard, it is considered that these aspects of the development would not impact upon the amenity of residential occupiers or the users of nearby commercial (A1/A3/A4/B1) and non-residential institutions (D1) in the vicinity. The following assessment relates to the reconstruction of the ninth-floor level and the proposed extension at tenth floor level.

Outlook and sense of enclosure

- 6.4 As the proposed extension would be set back from the front elevation and set in from the north and south elevation along the building's core, it is considered that the proposed extension would not impact upon the outlook of the buildings that surround Russell Square. There would be a minor alteration in the outlook as in some views, the new roof of the extension would be visible; however, this would not be regarded as a material or adverse change in the outlook. Furthermore, due to the considerable separation distance between the application building and the buildings which surround Russell Square and the sight angles (due to the high positioning of the extension with the setback), it is also considered that these factors contribute to the proposed extension not impacting upon the outlook from these buildings.
- 6.5 At the rear, as the proposal demonstrates that it would not be visible from Queen Square, it is not considered that the proposed extension along the rear wing would impact upon the outlook from the buildings that surround Queen Square in particular Queen Court which is in residential use.
- 6.6 As such, it is considered that the proposed rooftop development would not cause a sense of enclosure to the surrounding properties, particularly those in residential use.

Daylight/Sunlight

- 6.7 As the proposed extension would be set back from the front elevation of the building core by 5m and would be single storey in height, it is considered that the proposed extension would not impact upon the daylight and sunlight experienced by the buildings that surround Russell Square. This is in conjunction with the raising of the ninth-floor that would add some further height. This is, again, due to the considerable distance between these buildings, the angles and the setback from the extension.
- 6.8 The proposed extension along the rear wing is considered to not impact the daylight and sunlight experienced from the rear windows of Nos. 12-19 Queen Square (which are in educational (D1) use), due to its set back from the rear elevation of the rear wing. It is considered that the proposal would not impact upon the daylight and sunlight of the west facing upper windows of Queen Court (in residential use) located approximately 70m away.
- 6.9 It is considered in this instance that a daylight and sunlight assessment is not required. This is due to the set back of the proposed extension from both the front and rear, the existing dense and built

up nature of the vicinity (particularly at the rear of the site), and the fact that the uses that immediately adjoin the site are not in residential (C3) use.

Overlooking/Privacy

- 6.10 The proposed reconstruction and extension at tenth floor level is considered to not cause new opportunities or increased levels of overlooking to neighbouring residential occupiers at Queen Court as there would be a considerable separation distance of approximately 70m.
- 6.11 Otherwise, the proposed extension would overlook views that are already overlooked such as Russell Square, Queen Square, the entrance courtyard, the service yard of the hotel and the rear of Nos. 12-19 Queen Square. This is considered acceptable and not a harmful or adverse change in relation to neighbouring sites which are not residential in use.

Noise, vibration and odour

- 6.12 The proposed extension would generate noise from general patronage that is considered to not be harmful to the neighbouring commercial and educational uses, nor Queen Court that is in residential use. No mechanical plant is proposed in this application and as such it is considered that there would be no concerns from noise, vibration or odour generating from the development.

Light Spill

- 6.13 Due to the glazed nature of the western, southern and eastern elevation of the extension, light would be emitted through the glazing. It is considered that the lighting emitted would not be harmful to the residential occupiers at Queens Court, nor would it be harmful to the amenity of the general area. As the extension would be set back from the front and rear elevation and the neighbouring buildings are considerably smaller in height, the potential light spill would not be visible and the proposed extension is not considered to result in a "beacon" on top the existing hotel building.
- 6.14 The proposed interior lighting is anticipated to not be strong considering the proposed use and function of the reconstructed ninth-floor and tenth-floor extension. The only opportunity where the extension and the minor light emitted during the evening period would be from the upper levels of the Senate Building located behind the western buildings of Russell Square (approximately 300m to the west). This building is in educational (D1) use.

7. Transport Impact

- 7.1 The applicant has submitted a transport statement that details that the application site is located within a highly accessible Central London location including a number of London Underground stations as well as being served by bus route, cycling routes and walking. The transport statement assesses that as the proposals do not increase the number of hotel bedrooms and would accommodate a relocated dining and drinking area, it would not result in significant changes to the existing situation in regards to transport.
- 7.2 The proposed development would generate an increase in numbers of visitors to the site; however, due to the accessible Central London location of the site, the additional person trips are likely to be dispersed amongst different transport modes such as the London Underground, bus, cycling and walking. This would be no different to the existing situation and it is considered that even though there would be anticipated rise in trips to the hotel, it would be not be at a level that would put strain on these aforementioned transport modes.
- 7.3 Taxi trips would be generated to the hotel in the same way as the existing situation using the entrance courtyard accessed from Russell Square. The proposed development would be likely to result in an increased use of taxi hire to and from the hotel site; however, it is considered it would not be at a harmful level to the nearby highway network, nor would it contribute to traffic and congestion in the immediate area.

Car-free development

- 7.4 The nearest stations are Russell Square (Piccadilly Line) and Holborn (Piccadilly and Central Line), whilst the nearest bus stops are located on Southampton Row and Woburn Place. The site has a PTAL score of 6B (best). The site is located within the Kings Cross controlled parking zone (CA-D), which operates from Monday to Friday 08:30-18:30 and Saturdays 08:30-13:30.
- 7.5 Due to the existing nature of the hotel which contains an underground car-park, the minimal physical uplift of the development, and the nature of its use within Central London, it is considered that a S106 legal agreement to acquire the development as car-free is not necessary. Staff, guests and everyday patrons are most likely to access the site via public transport and/or walking.

Construction Management

- 7.6 Policy T4 of the Local Plan states that CMPs should be secured to demonstrate how developments would minimise impacts from the movement of goods and materials during the construction process (including demolition works). For some developments this may require control over how the development is implemented (including demolition and construction) through a CMP.
- 7.7 The proposal would involve a significant amount of construction works which is likely to generate a significant number of construction vehicle movements during the overall construction period. The primary concern for the Council is public safety but also to ensure that construction traffic does not create (or add existing) traffic congestion. The applicant has submitted a draft CMP as part of the application submission. The CMP will also require the submission of air quality monitoring and mitigation details to ensure that the works do not result in any issues of localised air pollution in line with policy CC4.
- 7.8 Planning permission is subject to a S106 legal agreement to secure a detailed CMP in the Council's pro-forma) and a CMP implementation support contribution of £7,620. It is noted that regardless of the draft CMP, a detailed CMP is required to be secured by legal agreement.
- 7.9 It should be noted that the Council will need all construction vehicle movements to be scheduled to avoid morning and afternoon/evening peak periods. The Council will also require the principal contractor to register the development with the Considerate Constructors Scheme. The principal contractor will also need to comply with the CLOCS standard as discussed in the Council's CMP pro-forma. It is expected that meaningful consultation is undertaken by the principal contractor prior to the submission of the first draft of the CMP to the council.

Highways Contribution

- 7.10 The Council will expect works affecting highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport links and road and footway surfaces following development in line with policy A1.
- 7.11 The proposal could lead to significant levels of damage to public highway adjacent to the site along Russell Square. The Council would need to repair any such damage (e.g. repaving of the adjacent footpath). The highway works would also ensure that the proposed development interfaces seamlessly with the adjacent public highway. The highway contribution would be secured by a S106 legal agreement. A request for the exact costing for these works was being prepared by the Council's Highways Engineers at the time of writing and, once produced, will be incorporated into the legal agreement.

Cycle parking

- 7.12 The submitted transport statement indicates that as a result of the proposed development, the number of full time staff employed would increase from 110 to 120 and part-time staff increased from 10 to 15. The overall amount of staff would increase from 120 to 135. As such, in line with the London Plan and CPG Transport, a condition would be attached to ensure that the development

provides 17x cycle parking facilities that are secured and covered at ground floor level within the site. This is to encourage more sustainable modes of transport to the site such as cycling. As there remains sufficient space within the overall site to accommodate this requirement, this can reasonably be secured via condition.

8. Sustainable Design and Construction

8.1 In line with policies CC1 and CC2, the Council will require development to incorporate sustainable design and construction measures. The applicant have submitted energy, BREEAM and sustainability statements which 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 to reduce demand.

8.2 Following an initial review by the Council's Sustainability officers, the submitted Energy and Sustainability report were updated multiple times during negotiations. The development would result in a 16.5% reduction in CO2 emissions below Part L of Building Regulations. Whilst it is the case that a reduction of 19% is generally expected for new build residential development, given that the development would represent an extension to an existing building and would remain in commercial use this is not objectionable. 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.

8.3 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.

9. Community Infrastructure Levy (CIL)

9.1 Should the application be granted planning permission, the scheme would be liable for both the Mayoral CIL and the Camden CIL.

9.2 Based on the information given on the submitted plans and CIL form, the charge is likely to be £26,750 (535sqm x £50) for the Mayor's CIL and £267,500 (535sqm x £500) for the Camden CIL. This is an estimate and the final amount would be subject to indexation and agreed final floorspaces.

10. Recommendation

10.1 Grant Planning Permission subject to S106 Agreement.

S106 clauses:

- i. Construction Management Plan and implementation fee (£7,620);
- ii. Highways Contribution (£tbc);