



Planning & Development Ltd

JMS PLANNING & DEVELOPMENT LIMITED

PLANNING STATEMENT

**IN SUPPORT OF A CHANGE OF USE,
REFURBISHMENT AND RECONFIGURATION OF
EXISTING GROUND FLOOR AND BASEMENT
AT**

**23 EUSTON ROAD, KINGS CROSS,
LONDON, NW1 2SB**

December 2019

Client: St Pancras Hotel Group

Project: 23 Euston Road, Kings Cross, London, NW1 2SB

Date: December 2019

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SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared by JMS Planning & Development Ltd (JMSP+D) on behalf of Megaro Hotel Limited in support of a full planning application for change of use of the ground floor and basement from a Bank (A2 Use Class) to a Hotel (C1 Use Class) together with the associated refurbishment and reconfiguration of the existing ground floor and basement at 23 Euston Road, Kings Cross, London, NW1 2SB. It is intended that the application site will form part of the highly successful Megaro Hotel which is located around and above the application site.
- 1.2 The application site was formerly a Barclays Bank but is now vacant having closed in October 2019. With the rising popularity in mobile and online banking, high street banking is becoming less popular and as a consequence there is a move away from traditional physical branches. The closure of the former Barclays Bank is therefore part of a growing high street trend. The applicant is the freeholder of the site and is also the freeholder and operator of the Megaro hotel which encompasses the application site. The applicant has therefore decided to extend the existing hotel to incorporate the existing, vacant former bank.
- 1.3 Tourism is key to London's economy, with London being the second most visited City in the world. The proposed change of use is therefore in line with the aspirations of National policy, the London Plan and Local Planning policies which seek to ensure that improved and enhanced tourist facilities are provided into the future. The application will therefore remove a currently vacant unit, improve the vitality and viability of the local area and create more than 20 new jobs as well as removing existing anti-social behaviour outside the site which has previously occurred outside of banking hours.
- 1.4 Accordingly a description of the site and surrounding area is provided at Section 2. An overview of the site's planning history is provided at Section 3. Details of the application proposal are set out at Section 4, with an overview of planning policy provided at Section 5. A description of the key planning issues are detailed at Section 6, with the conclusions set out at Section 7. This Planning Statement is also accompanied by a Design and Access and Heritage Statement.

SECTION 2: THE SITE AND SURROUNDING AREA

- 2.1 The application site comprises the basement and ground floor level of 23 Euston Road, Kings Cross, London, NW1 2SB.
- 2.2 The application site is located at the junction of Euston Road (A 501) and Belgrove Street opposite King's Cross St Pancras Underground and Railway Station which serves the Circle, Hammersmith & City and Metropolitan, Northern, Piccadilly and Northern Lines and inter-city rail services to the East of England, Yorkshire, North East England and eastern and northern Scotland. In addition, the site benefits from several bus stops in the vicinity serving bus routes 68, 168, 259, 17, 10, 59, 91, 46, 390, 30, 73, 476, 45, 205, 63 and 214. The application site has a PTAL rating of 6b which is excellent.
- 2.3 The existing site can be accessed through the main entrance in the corner junction of Euston Road and Belgrove Street
- 2.4 As stated, the application site was previously occupied by Barclays Bank which closed its branch at this location on 25 October 2019. Upper levels above the application site are occupied by the Megaro Hotel (Use Class C1).
- 2.5 The site is located within the Kings Cross Conservation Area. The implications of this are covered within the accompanying Heritage Statement.

SECTION 3: PLANNING HISTORY

3.1 An online review of the site's planning history has been undertaken, the planning records of relevance to the proposal are detailed below:

Application Reference	Proposal	Decision	Dated
2015/2183/P	Replacement of existing 2 x Automatic Teller Machine (ATM) and alterations to existing windows all at ground floor level to accommodate internal equipment cabinets to Barclays Bank (Class A2).	Granted	10/07/2015
2014/3991/L	Display of four internally illuminated projecting lantern signs (Listed Building Consent)	Withdrawn	18/06/2014
2014/3844/A	Display of four externally illuminated projecting lantern signs (Advertisement Consent)	Granted	18/06/2014
2010/4862/P	Replace existing fan light sections of windows with new glass louvres to five ground floor windows the side elevation (Belgrave Street) of existing bank (Class A2)	Granted	09/11/2010
2010/4797/P	Change of use of part ground floor and basement from financial and professional services (Class A2) to Hotel (Class C1) in association with existing hotel on upper floors, with ancillary bar at basement floor level and associated alterations, including installation of new hotel entrance on Belgrave Street and alterations to the existing Euston Road including alterations to fenestration details at ground floor level.	Granted	05/11/2010

Application Reference	Proposal	Decision	Dated
2010/3952/A	Display of 1 X internally-illuminated projecting sign and 2 X internally-illuminated hanging signs (in windows) to front elevation and 2 x internally-illuminated fascia signs to front and side elevation of existing bank (Class A2)	Granted.	16/09/2010
2010/3219/P	Installation of 4 external lights and formation of new opening in existing railings to side elevation and installation of 2 CCTV cameras on front elevation of existing bank (Class A2).	Granted	17/08/2010
8600331	Infilling the basement area of Belgrove Street frontage to provide additional office space. Installation of a second automatic cash dispenser. Relocation of night safe to Belgrove Street together with formation of an access path.	Granted	09/04/1986
CA/51/B	Erection at 23 Euston Road, NW1 of two sets of individually illuminated letters; each set reading 'Barclays Bank'.	Granted	09/01/1974
CA/51/A	Erection at 23 Euston Road of one illuminated single sided fascia sign on the splayed corner measuring 0.72m (2' 6") x 1.25m (5' 0"). Overall height 4.32m (14' 2"), coloured blue with white eagle motif.	Granted	28/09/73

3.2 The above table represents all the planning history that is available online. The planning history demonstrates that the site has been used historically as a Bank (Use Class A2) with neighbouring uses comprising a Hotel (Use Class C1).

SECTION 4: THE PROPOSAL

- 4.1 This planning application seeks full planning permission for a change of use of the basement and ground floor from A2 (Bank) to C1 (Hotel) together with associated reconfiguration works at 23 Euston Road, Kings Cross, London, NW1 2SB.
- 4.2 Historically the ground floor and basement of the application site have been used as a Bank (Use Class A2). The use of the ground floor was split between that which was used as a public area and that which was used privately by the bank as offices.
- 4.3 A lift and stairs lead to the basement which was also used by the Bank with a staff room, male and female toilets and storage areas.
- 4.4 Broadly speaking the works necessary to facilitate the change of use would comprise the establishment, remodelling and refitting of internal restaurant space on the ground floor with tables and chairs, booths, seating for customers and a bar to form part of the adjacent Megaro Hotel. There would also be the addition of a new external terrace area on Belgrove Street. Works to the basement would be minimal comprising the reconfiguring of the existing toilets, staffroom and storage areas to provide extended male, female and DDA toilet facilities.
- 4.5 The external terrace area would comprise black painted metal railings, with hardwood timber trellis and hardwood timber planter boxes, surface mounted heater lamps and pink and grey retractable awning with signage.
- 4.6 The externals of the building would remain largely as existing, minor changes proposed would include surface mounted external lighting to the side of the building, surface mounted 'Magenta' signage letters and protruding sign and replacement windows within the existing window structure.
- 4.7 The proposal would seek to retain existing hardwood timber entrance doors and frames with the existing fanlight to be replaced with clear glass and signage patterned film. A black painted metal framed clear double glazed hinged external door would provide access to the external terrace.

4.8 Overall it is considered that the proposed change of use would result in an enhanced tourism offer with minimal design changes which will result in enhancement to Conservation Area. This is expanded upon further within the Design and Access and Heritage Statement submitted in support of this document.

SECTION 5: PLANNING POLICY

5.1 This section of the Planning Statement sets out relevant general national and local planning policy relevant to the proposed development. Relevant design, access and heritage policies are detailed within the accompanying Design and Access and Heritage Statements.

National Planning Guidance

National Planning Policy Framework (February 2019)

5.2 The revised National Planning Policy Framework (NPPF) (February 2019) constitutes guidance for local planning authorities and decision takers. It is a material consideration in the determination of planning applications (paragraph 2).

5.3 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).

5.4 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways:

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing;

- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

5.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision making, this means:

- Approving development proposals that accord with the development plan without delay, and
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless;
 - The application of policies in the framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole (paragraph 11).

5.7 The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making (paragraph 12).

5.8 Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work

proactively with applicants to secure developments 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).

- 5.9 Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing (paragraph 47). Local Authorities may give weight to relevant policies and emerging plans according to the stage at which they are at and the extent of unresolved objections (paragraph 48).
- 5.10 Planning policies and decisions should help create the conditions which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and where there are 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).
- 5.11 Planning policies should set out clear an economic vision and strategy which positively and practically encourages sustainable economic growth having regard to local industrial strategies and other local policies for economic development and regeneration; set criteria to identify strategic sites for local inward investment to match the strategy and meet anticipated needs over the plan period; seek to address potential barriers to investment; and be flexible enough to accommodate the needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances (paragraph 81).
- 5.12 Planning policies and decisions should recognise and address the specific locational requirements of different sectors (paragraph 82).

- 5.13 Planning policies and decisions should support the role that town centres play at the heart of local communities taking a positive approach to their growth management and adaptation. Policies should define a network and hierarchy of town centres and promote their long term vitality and viability; define extent of town centres and primary shopping areas; retain and enhance existing markets and, where appropriate, reintroduce or create new ones; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed looking at least 10 years ahead; where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well-connected to town centres and if these are not able to be identified, set out policies which should explain how identified needs can be met in other accessible locations that are well-connected to the town centre; and recognise that residential development often plays an important role in ensuring the vitality of centres and encouraging residential development on appropriate sites (paragraph 85).
- 5.14 Local Planning Authorities should apply a Sequential Test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available (or expected to become available within a reasonable period of time) should out of centre sites be considered (paragraph 86).
- 5.15 When considering edge of centre or out of centre proposals, preference should be given to accessible sites which are well-connected to the town centre. Applicants and Local Planning Authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centres or edge of centre sites are fully explored (paragraph 87).
- 5.16 When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, Local Authorities should require an Impact Assessment if the development is over a proportionate locally set floorspace threshold and if there is no locally set threshold the default threshold is 2,500 sqm of gross floorspace. This should include assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (paragraph 89).

- 5.17 Planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 117).
- 5.18 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

The Development Plan

- 5.19 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that all applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.20 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 the statutory development plan comprises The London Plan (Consolidated with Alterations Since 2011)(March 2016) and the Camden Local Plan (adopted 3 July 2017).
- 5.21 Each of the documents relevant to the application site is considered in turn below.

The London Plan (Consolidated With Alterations Since 2011) (March 2016)

- 5.22 Policy 4.5 (London's Visitor Infrastructure) confirms that the Mayor will, and Boroughs and relevant stakeholders should, support London's visitor economy and stimulate its growth and seek to achieve 40,000 net additional hotel bedrooms by 2036, of which 10% should be wheelchair accessible.
- 5.23 The supporting text to the policy (in respect to visitor infrastructure) at paragraph 4.25 confirms:

"Visitors play an important part in the City's economy. In 2012, London attracted nearly 28 million overnight visitors, comprising 16 million from overseas and 12 million

from the UK. A significant number of these are for business purposes. The Capital also receives 297 million day visitors a year. Together they help to support 253,000 jobs, 95.5% of the total employment for London.”

5.24 Paragraph 4.26 states:

“The Mayor’s tourism vision sets out key objectives to develop the quality of the accommodation; enhance visitor perceptions of value for money and improve the inclusivity and accessibility of the visitor experience. To ensure adequate hotel provision this plan sets a target of 40,000 net additional hotel rooms by 2036, recognising that over this period London may “mature” as a visitor destination leading to a reduction in historic growth rates. This trend will be closely monitored.”

5.25 Paragraph 4.31 states:

“Enhancing provision for businesses is a mayoral priority and requires improvement as much as to the quality of accommodation but also to the wider range of services required by this section of the market, including capacity for high quality, large-scale convenience centre functions in or around the CAZ.”

5.26 Policy 4.7 (Retail and Town Centre Development) sets out the Mayor’s approach to retail and town centre developments and states that in taking planning decisions on proposed retail and town centre development, a number of principles should be applied including the scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment. Retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport. Proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.

5.27 Paragraph 4.26 sets of the Mayor’s Tourism Vision, it includes key objectives to develop the quality of accommodation; enhance visitor perceptions of value for money and improve the inclusivity and accessibility of the visitor experience. The aim is to ensure adequate hotel provision. The London Plan sets a target of 40,000 net additional hotel rooms by 2036.

The Camden Local Plan (July 2017)

5.28 Policy A1 (Managing Impact and Development) confirms that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity.

- 5.29 Policy A4 (Noise and Vibration) confirms the Council will seek to ensure that noise and vibration is controlled and managed.
- 5.30 Policy TC2 (Camden's Centres and Other Shopping Areas) states that the Council will promote successful and vibrant centres throughout the Borough to the serve the needs of residents, workers and visitors this includes through a number of measures including making sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres. It goes on to state that it will seek to protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre.
- 5.31 Policy TC4 (Town Centre Uses) sets out how the Council will seek to ensure that town centre uses do not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. The following considerations will be taken into account:
- a. the effect of development on shopping provision and the character of the centre in which it is located;
 - b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non implemented planning permissions and any record of harm caused by such uses;
 - c. the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;
 - d. the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail;
 - e. impacts on small and independent shops and impacts on markets;
 - f. the health impacts of development;
 - g. the impact of the development on nearby residential uses and amenity and any prejudice to future residential development;
 - h. parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
 - i. noise and vibration generated either inside or outside of the site;

- j. fumes likely to be generated and the potential for effective and unobtrusive ventilation; and
- k. the potential for crime and antisocial behaviour, including littering.

5.32 Planning conditions will also be used as a basis for seeking to mitigate potential impacts.

5.33 Appendix 4 (Centre Frontages) of the Camden Local Plan confirms that in the Kings Cross Central London Frontages (within which the site is located) no further food, drink and entertainment uses [our emphasis] will be permitted.

5.34 Policy E3 (Tourism) sets out the Council's position with respect to Tourism and states that the Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation through a number of measures including through expecting new, large scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of Kings Cross, Euston, Tottenham Court Road and Holborn. It goes on to state that all tourism development and visitor accommodation must be easily reached by public transport, provided any necessary pick-up and set down points, 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.

Supplementary Planning Guidance

5.35 Supplementary Planning Guidance documents which provide detailed planning guidance are relevant including Camden Planning Guidance 1 – Design.

Emerging Planning Policy

Draft New London Plan Consultation 2017

5.45 The latest published version of the Draft London Plan comprises the '*intended to publish*' Draft London Plan. This is currently awaiting confirmation from the Secretary of State in this regard.

- 5.46 Draft Policy SD7 (Town Centre: Development Principles and Development Plan Documents) states that boroughs should take a town centre uses first approach, discouraging out-of-centre development of main town centre uses.
- 5.47 Draft Policy E10 (Visitor Infrastructure) sets out the Mayor's position with respect to visitor infrastructure in London. It states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure. It states that the special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.
- 5.48 Paragraph 6.10.1 confirms *"London is the second most visited city in the world and the Mayor wants to spread economic and regeneration benefits by working with London and Partners to promote tourism across the whole of the city, including outside central London. This plan supports the enhancement and extension of London's attractions, particularly the town centres and well-connected parts of outer London, complemented by supporting infrastructure including visitor accommodation ..."*. Subsequent paragraph 6.10.2 confirms that *"given the importance of tourism to London's economy, London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the Capital. It is estimated that London will need to build an additional 58,000 bedrooms or serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum"*.
- 5.49 Paragraph 6.10.5 also confirms that *"improving the availability of accessible serviced accommodation is vital to ensure that as many visitors as possible can stay in London and experience its visitor attractions and business offer"*.

Summary of Planning Policy

- 5.50 Existing National and Development Plan policy is strongly supportive of tourism development, particularly that which will be located in growth areas such as near to Kings Cross. This is subject to proposals meeting criteria including that relating to accessibility and minimising amenity impacts. The site is highly accessible and the potential adverse impact on amenity is considered to be negligible as considered elsewhere in this report. On this basis it is considered that the proposal, which seeks to improve the tourism offer through the enhancement of an existing hotel, is wholly supported by planning policy.

SECTION 6: KEY PLANNING ISSUES

6.1 Having reviewed the relevant planning policy background and the characteristics of the site and surrounding area and the proposed development, it is considered that the following issues are most relevant to the consideration of the application.

1. Need for Hotel Accommodation in London;
2. Retail and Tourism;
3. Neighbouring Amenity; and,
4. Accessibility and Parking Issues

The Need for Hotel Accommodation in London

6.2 Given the importance of the visitor economy to London there has been significant research on the value of tourism and the importance of hotels to London as well as the future demand for tourist bedspaces. All of this research supports the policy position that new hotels are desirable and are to be welcomed. It therefore follows that an extension to an existing successful hotel is also supported by policy and is to be welcomed. An overview of this research is set out below:

Policy E10 Visitor Infrastructure Matter 61 – Mayor of London EIP Paper (in respect to the Draft London Plan).

6.3 Paragraph 61.1 confirms that demand for visitor accommodation in London is expected to reach 196.4 million nights by 2041, up from 138.5 million visitor nights in 2015. (42.9 million international visitor nights in addition to 15 million domestic visitor nights). Paragraph 61.9 confirms the emerging London Plan requirement to provide additional 58,000 bedrooms by 2041.

6.4 Supply should be dealt with at the London level. Issues such as amenity and over concentration should be dealt with at Borough level (paragraph 61.14). Notably, emerging Plan Policy GG5 Growing a Good Economy, seeks to “*conserve and enhance*” London’s global competitiveness.

6.5 At Paragraph 61.3 the importance of tourism to London is recognised within the Mayor’s Economic Development Strategy and Cultural Strategy.

6.6 Emerging Plan Policy E10 (c) seeks to maintain a sufficient supply and range of serviced accommodation. E10 (d) and (e) promote serviced accommodation in the CAZ recognising the importance of tourism and business visitors to central London.

Projections of Demand and Supply for Visitor Accommodation in London to 2050 – GLA Economics Working Paper 88 (NLP/EC/011)

6.7 The above Report by GLA Economics confirms that London’s supply of serviced accommodation (ie, hotels, hostels, B&Bs and guest houses) in 2015 was 145,737 rooms. Most of this was located in central London.

6.8 Demand for London accommodation is projected to reach 196.4 million nights by 2041 from 138.5 million visitor nights in 2015. This is driven by a 42.9 million increase in international visitor nights, and a 15.0 million increase in domestic visitor nights.

6.9 Based on these demand projections it is estimated that London will need to add an additional 58,140 rooms to the serviced accommodation supply by 2041, at an average of 2,236 rooms per annum.

6.10 In terms of the number of new serviced accommodation rooms that will need to be delivered (ie, accounting for closures), it is projected that 77,019 new rooms will need to be provided, at an average of 2,962 new rooms per annum.

6.11 The database consolidated by GLA Economics estimates that there were 145,700 rooms available as serviced accommodation in London as of December 2015 across 2,070 different establishments, an average of 70 rooms per establishment.

Table 3: Visitor accommodation in London, 2015, by accommodation type

Type	Establishments	Rooms	Average rooms/establishment
Apartments	248	10,467	42
B&B	505	4,512	9
Hotel	1,253	127,975	102
Hostel	64	2,783	43
TOTAL	2,070	145,737	70

Source: AMPM Database and GLA Economics research

6.12 Spread of accommodation by Borough:

Table 4: Serviced accommodation room supply by London borough, December 2015

Borough	Number of bedrooms	Share of London
Westminster	38,480	26.4%
Camden	18,038	12.4%
Kensington and Chelsea	15,151	10.4%
Hillingdon	9,885	6.8%
Tower Hamlets	6,757	4.6%
City of London	6,064	4.2%
Southwark	5,802	4.0%
Newham	4,810	3.3%
Hammersmith and Fulham	4,590	3.1%
Lambeth	4,269	2.9%
Hounslow	3,915	2.7%
Islington	3,633	2.5%
Croydon	2,574	1.8%
Brent	2,417	1.7%
Ealing	2,275	1.6%
Greenwich	2,048	1.4%
Hackney	1,929	1.3%
Richmond-upon-Thames	1,719	1.2%
Barnet	1,485	1.0%
Wandsworth	1,393	1.0%
Redbridge	1,299	0.9%
Kingston-upon-Thames	1,218	0.8%
Enfield	791	0.5%
Harrow	718	0.5%
Waltham Forest	614	0.4%
Merton	578	0.4%
Havering	576	0.4%
Bexley	571	0.4%
Bromley	564	0.4%
Barking and Dagenham	562	0.4%
Lewisham	448	0.3%
Haringey	329	0.2%
Sutton	235	0.2%
Greater London	145,737	

Source: AMPM database, GLA Economics analysis

6.13 The following table set out the net change in accommodation supply by Borough:

Table 5: Net change in accommodation room supply by London borough, 2011-2015

Borough	Net change in supply: 2011-2015	% of London change in supply
Southwark	1,951	10.2%
City of London	1,880	9.8%
Newham	1,689	8.8%
Tower Hamlets	1,552	8.1%
Camden	1,391	7.3%
Westminster	1,386	7.2%
Greenwich	1,283	6.7%
Hounslow	1,059	5.5%
Brent	782	4.1%
Lambeth	766	4.0%
Hackney	732	3.8%
Hillingdon	560	2.9%
Wandsworth	539	2.8%
Hammersmith & Fulham	512	2.7%
Islington	463	2.4%
Croydon	385	2.0%
Redbridge	335	1.7%
Richmond-upon-Thames	330	1.7%
Ealing	328	1.7%
Enfield	288	1.5%
Kingston-upon-Thames	229	1.2%
Barnet	199	1.0%
Bexley	176	0.9%
Bromley	146	0.8%
Lewisham	141	0.7%
Waltham Forest	125	0.7%
Barking & Dagenham	80	0.4%
Merton	17	0.1%
Havering	12	0.1%
Haringey	9	0.0%
Sutton	0	0.0%
Kensington & Chelsea	-28	-0.1%
Harrow	-169	-0.9%
Greater London	19,148	

Source: AMPM database, GLA Economics analysis

6.14 It is estimated that London will need to deliver an additional 58,140 rooms by 2041. In terms of the number of new serviced accommodation rooms that will need to be delivered (ie, accounting for closures), it is projected that 69,170 new rooms will need to be provided.

6.15 Serviced accommodation supply is projected to increase to reach 209,908 rooms by 2041, an increase of 64,171 rooms on the 2015 supply of 145,737. Of this increase, the Report states that 15,912 rooms are expected to be added between 2016 and 2018 based on the current development pipeline.

London and Partners (the Mayor's Official Promotion Agency). A Tourism Vision for London

6.16 By 2025 London is projected to attract over 40 million overnight visitors a year, 30% more than 2016's 31.2 million visitors.

- 6.17 Paragraph 2.1.2 confirms Tourism plays a vital role for London. The Report confirms that the sector employs 700,000 people and contributes £36 billion a year to the economy 11.6% of the capital's GDP. At paragraph 25 it is estimated that London needs at least an additional 23,000 hotel rooms by 2025 (April 2017 GLA Economics).

London's Hotels: Expanding Social Spaces, Research Paper Public by New London Architecture Published in December 2019

- 6.18 The research paper identifies that social spaces in hotels are not solely confined to the lobby and ground floor areas: with good engineering, rooftops can be freed of bulky services and transformed into gardens, bars and restaurants. Food and beverage remain a key component to any hotel's offer. Hotel restaurants have become destinations in their own right: across London there is now a plethora of different and unique offers, from casual cocktail bars to Michelin-starred restaurants.
- 6.19 Hotels have to expand their social offer, both in their physical and virtual spaces and reposition themselves as new urban social hubs in order to incorporate these transformations. Future guests will demand the most up-to-date technologies for an enhanced hospitality experience.
- 6.20 It confirms that there is a need for a greater understanding and evidence of a hotel's social value and contribution to local neighbourhoods.

Loss of Banking Facilities

- 6.21 The unit was previously occupied by Barclays Bank, closing on 25 October 2019. This is in line with current banking trends. More than a third of the UK's Bank branches have shut for good in less than 12 years. Whilst, a recent Which? Report confirmed that hundreds of those that remain have reduced their opening hours. The consumer group, Which? found there were 3,303 closures to the Bank branch network between January 2015 and August 2019. These closures are primarily driven by the 'Big Four' Banks, namely the Royal Bank of Scotland Group, Barclays, HSBC and Lloyds Banking Group. RBS closed almost three-quarters, or 412 of its branches across the UK. NatWest, which is also part of RBS, closed 638 branches (by far the most branches overall) representing almost half of the Bank's branch network. Similarly, Ulster Bank shut 35, or 44% of branches that used to operate in Northern Ireland. Overall, the report that the UK branch network has reduced from 9,803 to 6,549 outlets in

four and a half years, with the closures being offset by 49 branches opened by the challenger Banks such as Metro etc. Of the UK's Bank branches that remain open, 298 operate reduced opening hours of four days a week or fewer.

6.22 Of the big financial players, only Nationwide has retained a significant number of its branches (96%).

6.23 As such, the closure of the former Barclays premises is a commercial decision by the Bank which has resulted with the applicant being left with a vacant unit. As such, whilst the application seeks a change of use against A2 use (Bank), the application does not directly result in the loss of banking facilities on site as no Bank exists. Rather, the loss is simply one of Financial and Professional Services Use (Use Class A2) which could be used for a number of uses other than simply a Bank.

6.24 As such, the loss of banking facilities on the site should not be considered a significant factor which weighs against the change of use. Rather, the proposed change of use should be seen as a pragmatic response to structural changes within the UK banking industry which has resulted with the applicant being left with vacant premises in a prominent location.

6.25 The proposal site is located within the Kings Cross Central London Primary Frontage to which Camden Planning Guidance Document – Town Centres and Retail adopted in March 2018 is of relevance. Policy TC4 (Town Centres) and Appendix 4 (Centres) of the Camden Local Plan are also of relevance.

The Principal of the Use

6.26 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6).

6.27 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways:

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing;
- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

6.28 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

6.29 The bringing back of a vacant unit into beneficial use by the extension of an existing hotel in accordance with a recognised need for enhanced tourist infrastructure in London means that there are economic benefits to the proposal. As stated, in the new London Architecture Report published in December 2019. the application proposal will have an important social role. In addition, given the environmental improvements to the exterior of the site and the removal of the anti-social behaviour which has previously been occurring outside the site out of banking hours, it is considered the application proposal has both a social and environmental benefit. On this basis, it is considered the application comprises sustainable development and, as such, there is a planning policy presumption in favour of a grant of planning permission.

- 6.30 The proposal would result in the loss of a Bank (Use Class A2) and the addition of a Hotel (Use Class C1) to be used as a restaurant.

Town Centre and Vitality and Viability Issues

- 6.31 The application site is currently vacant and has been vacant since October 2015. There is no prospect of the site being reoccupied by a Bank. Relevant Development Plan policy does not seek to protect A2 uses in this location. Conversely, the extension of existing hotels and improvement to existing visitor infrastructure in London is supported at all levels of the Development Plan. The application proposal seeks an extension of the Megaro Hotel to incorporate a new restaurant and bar, which will provide additional facilities to residents of the hotel as well as providing an enhanced external environment and providing vitality and viability, activity within the streetscene and activity which is visible from the street. Given its location within the Central Activity Zone and in a Primary Frontage, which is dominated by an existing hotel, the extension of the hotel to this location is considered entirely appropriate. The application does not result in the loss of any A1 floorspace. On this basis, it is considered that the change of use proposal is entirely in accordance with relevant Development Plan policy.
- 6.32 Furthermore, adopted policies specifically seek to promote and encourage development which would improve and enhance the available tourism offer. Given that the proposal would enhance the offer of an existing hotel it is considered to be supported by policy.
- 6.33 As stated above, the proposal is part of a growing trend, with the rising popularity in mobile banking, high street banking is becoming less popular and as a consequence there is a move away from traditional physical branches. The proposed change of use of the Bank to a Hotel, would be a logical extension of existing neighbouring uses and would seek to improve the tourism offer available in a key location for tourists in London. Tourism is key to London's economy, with London being the second most visited City in the world.
- 6.34 The proposed change of use is therefore in line with the aspirations of National policy, the London Plan and Local Planning policies which seek to ensure that improved and enhanced tourist facilities are provided into the future.

Residential Amenity

- 6.35 The proposed change of use would facilitate the addition of an external terrace area to be used for dining on the Belgrove Street frontage in addition to the internal dining space which is proposed.
- 6.36 The addition of an external terrace area for diners has the potential for some limited adverse impacts upon residential amenity. The main potential adverse impact is likely to arise as a consequence of noise from those dining on the terrace. Policies are clear that while tourism and related uses are encouraged this is on the basis that such uses do not give rise to unacceptable impacts upon amenity and that any proposal is accessible.
- 6.37 However, when considering the potential adverse impact of noise it is important to consider the wider site context. While there may be some limited noise impacts associated with the use of the terrace by customers, these would be very minimal when considered in the context of the existing use of the surrounding area by cars, traffic and people.
- 6.38 The location of the proposed outdoor seating is situated on Belgrove Street in close proximity to the busy Euston Road which has four lanes of traffic (two lanes in each direction) and experiences high volumes of traffic levels at all hours of the day and night. Opposite the site, on the opposite side of Belgrove Street, is Access Self-Storage and at the front of the site Kings Cross Post Office (with storage use at other levels). As such, there are no residential units which are located in close proximity to the area of outdoor seating.
- 6.39 As a relatively small element of the development in the area, it is not considered the application has any significant adverse impact on local amenity. In this respect, it is considered that the proposed development should be considered acceptable.

Job Creation

- 6.40 The application proposal will secure the creation of a number of new jobs at the Megaro Hotel. In total, more than 20 new jobs are to be created. This will involve new chefs, waiting staff, mixologists, bar staff, etc. As such, the application proposal will result in a net gain of jobs on the site. There is no loss of jobs associated with the Bank – this having already closed.

Accessibility and Parking

6.41 The site has a Public Transport Accessibility Level (PTAL) of 6b which is excellent. It is considered that the development that will be created will be utilised by people who would make use of the abundant local public transport network and would not require a motor vehicle. As such, no parking is proposed as part of the change of use.

SECTION 7: CONCLUSIONS

- 7.1 This Planning Statement has been prepared by JMS Planning & Development Ltd (JMSP+D) on behalf of Megaro Hotel Limited in support of a full planning application for change of use of the ground floor and basement from a Bank (A2 Use Class) to a Hotel (C1 Use Class) together with associated refurbishment and reconfiguration of the existing ground floor and basement works at 23 Euston Road, Kings Cross, London, NW1 2SB. It is intended that the application site will form part of the highly successful Megaro Hotel which is located around and above the application site.
- 7.2 The application site was formerly a Barclays Bank but is now vacant having closed in October 2019. With the rising popularity in mobile and online banking, high street banking is becoming less popular and as a consequence there is a move away from traditional physical branches. The closure of the former Barclays Bank is therefore part of a growing high street trend. The applicant is the freeholder of the site and is also the freeholder and operator of the Megaro hotel which encompasses the application site. The applicant has therefore decided to extend the existing hotel to incorporate the existing, vacant former bank.
- 7.3 Tourism is key to London's economy, with London being the second most visited City in the world. The proposed change of use is therefore in line with the aspirations of National policy, the London Plan and Local Planning policies which seek to ensure that improved and enhanced tourist facilities are provided into the future. The application will therefore remove a currently vacant unit, improve the vitality and viability of the local area and create jobs as well as removing existing anti-social behaviour outside the site which has previously occurred outside of banking hours.
- 7.4 In addition, the application proposal will bring a vacant unit back into beneficial use, create new jobs and provide enhancement to the existing Megaro Hotel. The creation of the new restaurant will also address existing anti-social behaviour issues which have been occurring outside the Bank outside of normal trading hours and have continued following the closure of the Bank.

- 7.5 All relevant material planning considerations have been assessed including potential impacts upon residential amenity and accessibility. These assessments concluded that there would be no adverse impacts as a consequence of the proposals. Conservation and design matters are considered within the associated Design and Access and Heritage Statement and again, the proposals are considered acceptable in this regard.
- 7.6 On the basis of the above it is considered that planning permission should be granted.