

**TOWN AND COUNTRY PLANNING ACT 1990
(AS AMENDED)**

**OBJECTION AGAINST PLANNING APPLICATION
(2019/5214/P) AT PREMIER INN, 1 DUKE'S ROAD**

Erection of a two-storey roof top extension and a seven-storey annexe extension to existing hotel (Use Class C1); formation of ground floor restaurant (Use Class A3); together with alterations to the external appearance, access, plant, car parking and associated works (total uplift 2990sq. m)

On behalf of Somerton House Residents' Association

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1 INTRODUCTION

- 1.1 This objection has been prepared by MZA Planning on behalf of Somerton House Residents' Association which represents the residents of the 32 flats located above the Premier Inn building.

2 SITE AND SURROUNDINGS

- 2.1 The application site is an existing Premier Inn hotel located on the corner of Duke's Road and Euston Road. The hotel is 6 storeys plus lower ground level. The western end of the hotel has a further 4-storey block on top of the hotel. This block contains 32 residential flats and it is known as 'Somerton House' which has a separate access from Duke's Road independent from the hotel.
- 2.2 There is a shared service yard/car park to the rear of the building. The yard is used for servicing and car parking for the hotel, and car parking for the residents of Somerton House.
- 2.3 The wider area is characterised by the commercial nature of Euston Road. The application site is partially located within the Bloomsbury Conservation Area with its northern boundary running through the site. The application property is not listed but there are a number of listed buildings within the immediate surrounding area.

3 RELEVANT PLANNING HISTORY

- 3.1 On 8 October 2019, the owners and operators of the Premier Inn brand, Whitbread Group PLC, submitted a planning application for the following development:

"Erection of a two-storey roof top extension and a seven-storey annexe extension to existing hotel (Use Class C1); formation of ground floor restaurant (Use Class A3); together with alterations to the external appearance, access, plant, car parking and associated works (total uplift 2990sq. m)."

4 PLANNING POLICY

- 4.1 National Planning Policy Framework (2019)
- 4.2 GLA London Plan (2016)
- 4.3 Camden Local Plan (2017)

5 OBJECTION

- 5.1 There are a range of grounds of objection which are elaborated below.

Character and appearance

- 5.2 Policy D2 of the Local Plan (2017) states that the Council will resist development outside of a conservation area that causes harm to the character and appearance of that conservation area.
- 5.3 Policy 7.8 of the London Plan (2016) also notes that development affecting heritage assets such as conservation areas and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.4 The abovementioned policies essentially seek to ensure that new development proposals do not result in any unacceptable visual harm to the character and appearance of the surrounding built environment, particularly if the development is likely to affect a heritage asset such as the setting of a Conservation Area.
- 5.5 The proposed development would technically take place just outside Bloomsbury Conservation Area. The proposed development would add significant additional bulk at an elevated level through an alien built form using uncharacteristic materials for the area particularly for the adjacent Bloomsbury Conservation Area. In this context, the proposal would unduly enclose the views out of the Conservation Area by significantly reducing the amount of sky visible whilst the design of the extension itself would create an uncharacteristic backdrop that is at odds with the predominant character and appearance of the Conservation Area. As such, the proposal is harmful to the Conservation Area.

- 5.6 The mock-up images below demonstrate the views from Bloomsbury Conservation Area (particularly Burton Street) which clearly show that the proposed development would create a harmful setting that would harm the views out of the Conservation Area.



Existing view from Burton Street in Bloomsbury Conservation Area



Proposed view from Burton Street in Bloomsbury Conservation Area

- 5.7 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) notes that Burton Street and surroundings have positive period characteristics across architectural styles and materiality. Examples include such features as moderate building heights, use of bricks and other traditional materials, and decorative late 19th and early 20th century buildings.
- 5.8 The proposed extension, which is contemporary in design approach, would appear as a visually odd addition that is out of character when viewed from the Conservation Area which is predominantly Victorian in architectural character. The additional height arising from the extension would be at odds with the modest building heights of the Conservation Area, creating a bulky backdrop. Furthermore, the materiality of the extension would also fail to be consistent with those used in the Conservation Area and the extension would appear as an alien feature readily visible from the Conservation Area. In this context, the extension would fail to relate to the Conservation Area satisfactorily and therefore would fail to preserve or enhance the character and appearance of the locality or the setting of the adjacent Conservation Area.
- 5.9 The NPPF specifically classes Conservation Areas and their settings as 'designated heritage assets' and requires applicants have a proper understanding of the significance of the heritage asset, and to design developments using appropriate expertise as necessary. It is clear that the applicant has failed to understand the significance of the Victorian character that contributes to creating this pleasant setting of the Bloomsbury Conservation Area and has not used any appropriate expertise in designing the proposed development. The quality of the local characteristics that make positive contributions to the setting of the Conservation Area will be severely compromised by the discordant design and materials proposed for this development.
- 5.10 Therefore, it is submitted that the proposal would be harmful to the character and appearance of the area, and would fail to preserve or enhance the character and appearance of the setting of the Bloomsbury Conservation Area. Therefore, the development is harmful to Bloomsbury Conservation Area which is contrary to the aims and provisions of Policy D2 of the Local Plan (2017) and Policy 7.8 of the London Plan (2016).

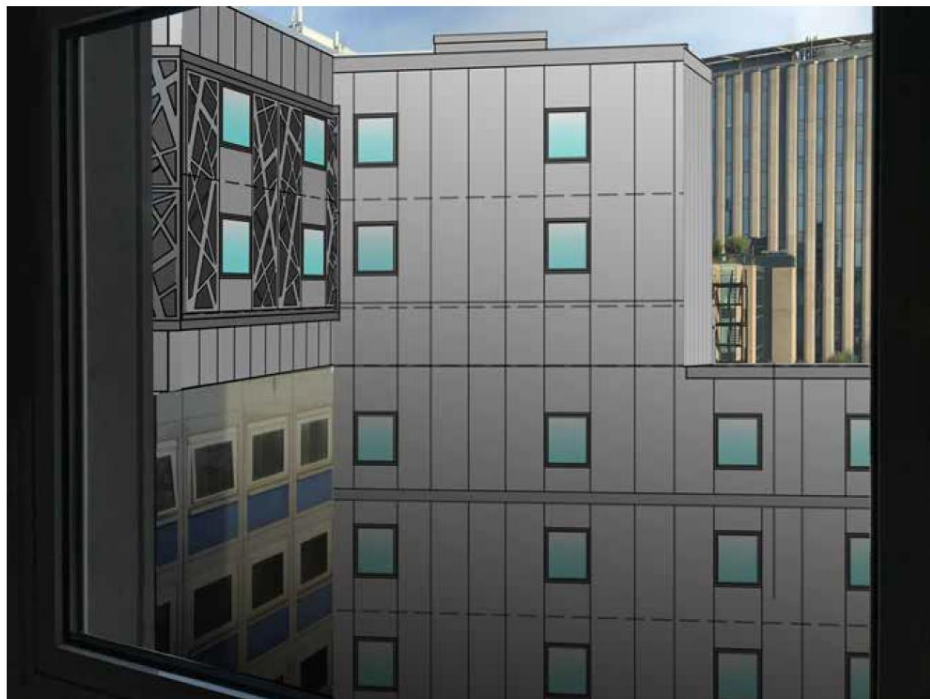
Neighbours' living conditions

- 5.11 Policy A1 of the Local Plan (2017) states that the Council will seek to protect the quality of life of occupiers and neighbours. It goes on to note that the Council will consider factors such as visual privacy, outlook, sunlight, daylight, overshadowing, fumes and noise to ensure that the amenity of neighbours is protected.
- 5.12 Policy 7.6 of the London Plan (2016) notes that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 5.13 The abovementioned policies essentially seek to ensure that new development proposals do not result in any unacceptable harm to the living conditions of neighbouring residents.
- 5.14 The proposed development would add some significant built form within very close proximity to the neighbouring residents at Somerton House. This additional bulk would significantly reduce the level of outlook enjoyed by the neighbouring residents within their habitable rooms such as living rooms and bedrooms. Furthermore, the proposed extension would significantly increase the sense of enclosure for the neighbouring residents to a detrimental level.
- 5.15 This excessive bulk in such close proximity to Somerton House naturally has a very big impact on the levels of daylight and sunlight received by the neighbouring residents at Somerton House. The applicant's Daylight and Sunlight Report clearly reports that nine windows at Somerton House would experience VSC reductions of over 20%, which are in excess of the 20% parameter suggested as acceptable by the BRE guidelines. It is therefore evident that the proposed extension is excessive in scale in such close proximity to neighbouring residents and the proposal would result in unacceptable reductions to the levels of daylight and sunlight enjoyed by the neighbouring residents at Somerton House.
- 5.16 The objectors have prepared a number of mock-up images below to visually demonstrate that the proposed development would reduce the

levels of outlook and natural light to unacceptable levels for the neighbouring residents at Somerton House. Furthermore, the images show that the sense of enclosure would also increase unacceptably for the neighbouring residents.



Existing view from a habitable room in Somerton House



Proposed view from a habitable room in Somerton House



Existing view from a habitable room in Somerton House



Proposed view from a habitable room in Somerton House



Existing view from a habitable room in Somerton House



Proposed view from a habitable room in Somerton House

- 5.17 In addition, the increased kitchen fumes from the larger commercial kitchen at Premier Inn would be vented out to a smaller space. This means that dispersion of fumes would be restricted and the residential flats directly above Premier Inn would suffer from increased fumes.
- 5.18 The decreased service yard space to the rear of the hotel building means that vehicles would be forced to undertake complex manoeuvring in the

much tighter space, causing much more noise pollution in a more confined area. The residential flats above Premier Inn would suffer from the increased noise pollution.

- 5.19 In the light of the above, it is clear that the proposed development at the application site would be harmful to the living conditions of the neighbouring residents, particularly through the loss of outlook and natural light, and the increased sense of enclosure. Furthermore, the neighbouring residents would suffer from increased fumes and noise pollution. This is contrary to the provisions of Policy A1 of the Local Plan (2017) and Policy 7.6 of the London Plan (2016).

6 CONCLUSION

- 6.1 The proposed development would be harmful to the character and appearance of the surrounding area, and would fail to preserve or enhance the character and appearance of the setting of the Bloomsbury Conservation Area.
- 6.2 The proposed development would detrimentally affect the amenities enjoyed by the neighbouring residents.
- 6.3 It is important for the planning officer to visit Somerton House to view the proposal and fully understand the impact on their properties.
- 6.4 The proposed development would fail to meet the aims and provisions of the LPA's Development Plan.
- 6.5 The LPA is respectfully requested to refuse the planning application.