

Leigh House Hotel, 1 Leigh Street,
London WC1H 9EW

Planning, Design, and Access Statement

May 2020



Issue Sheet

Report Prepared for: Gagen Raj

Leigh House Hotel, 1 Leigh Street, London WC1H 9EW

Planning, Design, and Access Statement

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1 Introduction

1.1 Instruction

- 1.1.1 This Planning, Design and Access Statement has been prepared by Lanpro Services in support of a Listed Building Consent application submitted on behalf of our client, Gagen Rajasekaran (hereafter referred to as "the Applicant"), in respect of minor internal and external alterations already undertaken at Leigh House Hotel, 1 Leigh Street, London, WC1H 9EW (hereafter referred to as "the Site").
- 1.1.2 The current application is therefore seeking retrospective Listed Building Consent (LBC) for those minor internal and external alterations.
- 1.1.3 The alterations undertaken are considered to constitute minor internal alterations and involves no substantial changes to the internal or external layout of the building. The works undertaken include limited external alterations at basement level and internal alterations at basement and ground floor level in response to the serving of an Enforcement Notice, dated 16th October 2019, from the London Fire Commissioner, as the responsible body for enforcing the Regulatory Reform (Fire Safety) Order 2005 in London. These works were time dependent and required to be carried out by 8th January 2020. A copy of the Enforcement Notice and correspondence received by our client from the London Fire Brigade (LFB) are included in **Appendix 1**.
- 1.1.4 This Planning, Design and Access Statement accompanies a retrospective Listed Building Consent application for:
- Creation of a new enclosed reception area at ground floor level through the removal of the former small guest room.
 - Removal of former reception kiosk.
 - Introduction of a double guest room and en suite bathroom on the basement floor level in the former breakfast room, breakfast room moved to rear of building in former single guest room.
 - Introduction of a new fire escape corridor allowing escape access to the front of the building from the new basement bedroom, entailing:
 - The introduction of a new partition between this corridor and the adjacent kitchen.
 - Swapping the location of the window and door on the basement's northern façade, re-using the door and replacing the non-original window frame with a new timber framed sash.

1.2 Submission Documents

- 1.2.1 In accordance with both national and local validation checklist, the documents outlined below collectively comprise the planning submission.
- 1.2.2 This report references these documents where relevant throughout, but they should be read in full. The planning submission comprises:
- Application Form and Ownership Certificate – prepared by Lanpro
 - Planning, Design and Access Statement – prepared by Lanpro
 - Site Location Plan – scale 1:1250 (dwg no. 1810-00-001)
 - Site Plan – scale 1:200
 - Pre-Existing and Existing Floor Plans – scale 1:100 (PL 001)
 - Pre-Existing and Existing Elevations – scale 1:100 (PL 002)
 - Heritage Statement – prepared by Lanpro

2 The Proposed Development

2.1 Site Context and Location

- 2.1.1 The application site, 'the Site', is located within the London Borough of Camden. The subject property is a hotel located in an end-of-terrace house which forms part of a grade II listed building consisting the properties 1-3 Leigh Street, located within the Bloomsbury Conservation Area. The terrace is oriented northeast to southwest along Leigh Street. As the property is end-of terrace, its primary entrance elevation faces northwest onto Leigh Street itself, which the southwestern 'end' elevation faces on the adjacent Marchmont Street.
- 2.1.2 The site falls within the designated Central Activities Zone in the adopted London Plan.
- 2.1.3 The subject property is made up of five floors, across which the hotel operated. This application refers only to work carried out on the basement and ground floor levels. The subject property is in good condition but has been subject to notable changes over time to its internal decoration and minor changes to the structure.
- 2.1.4 The Site is in a highly accessible location and has a PTAL rating of 6b. There are a number of bus stops at Euston Road, whilst Kings Cross and Euston tube stations, and Euston, St Pancras and King's Cross stations, are all within walking distance.

2.2 Relevant Planning History

- 2.2.1 The relevant 20th century planning history relating to the subject property has been reproduced below. The consents listed show that the site has been in continuous use as non-residential accommodation since at least 1975, with a change of use granted from student accommodation to hotel accommodation in 2010 (ref: 2010/1977/P). Intermediate applications show that the site has undergone minor alternations and cosmetic changes as required by the operational needs of the approved use on site.

Reference	Description	Decision
2016/3470/L	Erection of a mansard roof extension and alterations to internal partitions at basement, ground and third floor levels.	Refused 05/10/2016
2016/2895/P	External alterations including erection of a mansard roof extension.	Refused 05/10/2016
2010/1977/P	Change of use to a Hotel (Class C1)	Approved 25/06/2010
LSX 00 05081	Installation of nine shower pods to bedrooms, as shown by drawing numbers 001, 002, 003, 004, 005, (existing), 001-01, 002-01, 003-01, 004-01, 005-01 (proposed) and details 006.	LBC Approved 06/11/2000
LSX 00 04746	Floor strengthening and external wall strapping, as shown by drawing numbers 51856 S/01 Rev P1, 51856 S/02 Rev P1, 51856 S/03 Rev P1, 51856 S/04 Rev P1, 51856 S/05 Rev P1, 51856 S/06 Rev P1 as amended by letter from	LBC Approved 26/09/2000

	applicant dated 14th August 2000.	
93 70222	Retention of existing doorway at basement level as shown on drawing numbers 1 & 2.	LBC Approved 24/11/1994
93 01301	Retention of existing doorway at basement level as shown on drawing numbers 1 & 2.	Approved 24/11/1994
21677	Continued use as a student's hostel.	Approved 11/12/1975

2.3 Proposed Development

2.3.1 The current application is seeking retrospective Listed Building Consent (LBC) for minor internal and external alterations, undertaken on the 6th January 2020 as required by the operational needs of the hotel, including the need to improve the fire escape safety of the basement level bedroom to meet up-to-date fire regulations.

2.3.2 Those works undertaken and therefore subject to this application are:

- Creation of a new enclosed reception area at ground floor level through the removal of the former small guest room
- Removal of former reception kiosk
- Introduction of a double guest room and en suite bathroom on the basement floor level in the former breakfast room, breakfast room moved to rear of building in former single guest room
- Introduction of a new fire escape corridor allowing escape access to the front of the building from the new basement bedroom, entailing:
 - The introduction of a new partition between this corridor and the adjacent kitchen
 - Swapping the location of the window and door on the basement's northern façade, re-using the door and replacing the non-original window frame with a new timber framed sash.

2.3.3 The work undertaken involves no substantial changes to the internal or external layout of the building. The only external development has been the swapping of the basement level door and window positions. Internally, no major structural works have been undertaken, with only partition walls built or removed. Fixtures and plumbing associated with the uses of each room have been altered as needed, whilst staying in keeping with the operational needs of the hotel.

3 Planning Policy Context

3.1 Primary Legislation

3.1.1 Under Section 38 of The Planning and Compulsory Purchase Act 2004 ('The 2004 Act'), the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise.

3.1.2 This chapter identifies the local planning policies that provide the framework within which an application for residential use at the site would be determined, together with any relevant material planning considerations that may support a development proposal where there is found to be some conflict with the development plan.

3.2 National Planning Policy Framework (NPPF)

3.2.1 National planning policy is set out in the National Planning Policy Framework (NPPF), this document was originally published in 2014, but has since undergone consultation and review. A revised document was published on February 2019 to replace the original document and now forms the new framework. This provides a framework within which regional and local policy is set.

3.2.2 Those relevant parts of the NPPF for the determination of this application relate to the requirement for good design, the assurance of the vitality of town centres, promotion of sustainable transport, and the presumption in favour of sustainable development.

3.2.3 Paragraph 80 of the NPPF outlines the need for planning policies to support economic growth and productivity taking into account local business needs., whilst section 7 "Ensuring the vitality of town centres", as a whole sets a framework for how planning policies should actively support the role of town centres and town-centre uses in appropriate locations.

3.2.4 Paragraph 186 states when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

3.2.5 Paragraph 195 outlines that local planning authorities should refuse consent where a development proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 196 concerns development proposals that will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

3.2.6 Paragraph 200 encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets, to enhance or better reveal their significance. It also states that development proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset, should be treated favourably.

3.2.7 Paragraph 201 establishes that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building which makes a positive contribution to the significance of the conservation area should be treated as either substantial harm under paragraph 195 or less than substantial under paragraph 196, as appropriate taking into account the relative significance of the building affected and its contribution to the significance of the conservation area as a whole.

3.2.8 Section 12 Achieving well-designed places, paragraphs 124 to 132, outlines the Government's policy regarding design. It emphasises that "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities".

3.3 Local Planning Policy Context

3.3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area unless any material considerations indicate otherwise (our emphasis). In this case the development plan comprises:

- The London Plan (March 2016); and
- The Camden Local Plan (July 2017).

London Plan

3.3.2 The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London Boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by Councils and the Mayor. Further Alternations to the London Plan (FALP) were adopted in March 2015. In addition, Minor Alterations to the London Plan (MALP) were published in March 2016.

3.3.3 London Plan Policy 4.5 discusses the need for Local Development Frameworks to identify the growth and sustainment of facilities for tourism accommodation within the cultural and central activity centres in London. This includes the renovation of existing accommodation and the encouragement of high-quality accommodation.

3.3.4 London Plan Policy 7.4 discusses the local character of buildings, streets and open spaces and notes that development should have regard to the pattern and grain of development, allow positively contributing buildings to influence future character and is informed by the historic environment.

3.3.5 London Plan Policy 7.6 relates to architecture and requires buildings to be of the highest architectural quality and of a scale, composition and proportion which enhances the public realm. The policy notes that materials and details should complement the established local character and that the amenity of surrounding areas should not be unacceptably harmed by new development.

3.3.6 London Plan Policy 7.8 indicates that development should be sympathetic to the form, scale, materials and architectural details of heritage assets, and should, where appropriate conserve, restore and re-use heritage assets. The policy requires historic environments such as conservation areas to be preserved and enhanced and development affecting heritage assets and their settings to conserve their significance in a sympathetic manner.

Camden Local Plan

3.3.7 The Camden Local Plan was adopted in July 2017 and sets out the Borough Council's strategic and development management policies, covering the period 2016-2031.

3.3.8 Policy E1: Economic Development, gets policy setting for the Council to aim to create the conditions for economic growth, including through securing and safeguarding existing employment premises and through recognising the importance of employment generating uses such as leisure and tourism, whilst Policy E2: Employment premises and sites, goes on to give direct support to employment uses supporting the functioning of the Central Activities Zone

3.3.9 Policy E3: Tourism, gives support to the encourage of tourism development within suitable areas within the borough, including the protection of existing visitor accommodation where in appropriate locations.

3.3.10 Policy D1: Design, sets out the council's requirements for all developments to be of high-quality design, through respecting local context and character, using high quality materials, and aids the preservation or enhancement of the historic environment and heritage assets.

- 3.3.11 This links closely to Policy D2: Heritage, which sets the council’s framework for protecting and developing sympathetically to designated heritage assets, including listed buildings and conservation areas. The council will not permit development that results in harm to heritage assets, or less than substantial harm in such cases the benefits of the proposal convincingly outweigh the harm. This includes for listed buildings, resisting development that harms the special architectural and historic interest of the building.
- 3.3.12 Within Policy TC4: Town centre uses, Hotels (C1 use class) are defined as appropriate so long as it does not cause harm to the character, function, vitality and viability of the local area or to the amenity of neighbours.

4 Planning Policy Context

4.1 Impact of Assessment

- 4.1.1 The alterations undertaken are considered to constitute minor internal alterations and involves no substantial changes to the internal or external layout of the building. The works undertaken include limited external alterations at basement level and internal alterations at basement and ground floor level in response to the serving of an Enforcement Notice, dated 16th October 2019, from the London Fire Commissioner, as the responsible body for enforcing the Regulatory Reform (Fire Safety) Order 2005 in London. These works were time dependent and required to be carried out by 8th January 2020.
- 4.1.2 The subject property forms part of a largely symmetrical terrace of gault brick and stucco-faced four-storey town houses with slate roofs, dated to 1810-13. The significance of the subject property is largely derived from the architectural interest of its principal street facing elevations, notably to Leigh Street, its scale and composition, its use of simple architectural detailing and materials, its corner location and its relationship to the adjacent terrace houses and streets.
- 4.1.3 The layout of the subject building is largely a result of the conversion of the original house into a student hostel in 1975 and subsequent adaption into a hotel. Original fixtures and fittings appear to have been lost over the course of its history, again most notably when the property was converted from a house and its arrangement altered to meet the needs of a student hostel.
- 4.1.4 As a result, the basement and ground floor do not retain any notable original fixtures or fittings internally that contribute to the buildings significance. The decorative features in place are all also a result of the conversion to a hotel in 2010. External fenestration to ground, first, second and third floor is of historic interest. The basement has however been subject to additional alterations which have seen original windows and doors removed and replaced.
- 4.1.5 Based on the above the works subject to this retrospective LBC application will be considered in terms of their impact on the significance of this listed building.

Ground Floor Alterations

- The creation of a new enclosed reception area at ground floor level through the removal of the former small guest room.
- 4.1.6 The ground floor plan layout of the subject property is the result of later 20th century alterations to the subject property, notably its conversion into a student hostel and hotel.
- Removal of former reception kiosk
- 4.1.7 The reception kiosk was a non-original feature of no architectural or historical value. Its removal has in no way affected the special interest of the listed building.

Basement Floor Alterations

- 4.1.8 Historically, the basement level, as a largely functional service space, was never intended to be of the same status as the upper floors. Original fixtures and fittings would therefore have been relatively plain and utilitarian, and these have been lost over the course of its history, notably as a result of its conversion into a student hostel.
- Introduction of a double guest room and en-suite bathroom on the basement floor level in the former breakfast room, the introduction of a corridor from staircase to fire door and cessation of cooking in the kitchen to reduce fire risk.
- 4.1.9 The proposed works have seen the basement dining area and bedroom converted into the above. This has required the installation of stud partitioning. No historical or structural walling has been removed and the layout itself is a consequence of the later conversion of the building. The internal works have not, therefore, had any material impact on any

- aspect that contributes to the significance of the listed building and are believed to be in accordance with all relevant policy and legislation.
- 4.1.10 Introduction of a new fire escape corridor allowing escape access to the front of the building from the new basement bedroom, entailing
- The introduction of a new partition between this corridor and the adjacent kitchen
- 4.1.11 As above, these works are wholly internal and restricted to an area devoid of historic fabric or fixtures and fittings of architectural or historic interest. The works have not therefore had any material impact on any aspect that contributes to the significance of the listed building and are therefore believed to be in accordance with all relevant policy and legislation.
- Swapping the location of the window and door on the basement's northern façade, re-using the original door and replacing the non-original window frame with a new timber framed sash
- 4.1.12 As above, the basement has been much altered and has lost all original fixtures and fittings. This also includes the fire door in question which was subject to an application which was granted permission in 1994 (Application No: 9301301). This application was for *'Removal of basement window, minor alterations to structural opening. Installation of hardwood external door.'* This confirms that the door was not original, and that the door was created where a window had previously been (see Fig. 21 in the Heritage Statement). This has been replaced with a new double glassed timber sash window. Double glazing has been introduced to meet part L requirements, as well as to better meet current use considerations.
- 4.1.13 The earlier door opening to Leigh Street was infilled with brick and concrete blocks up to the level of the new windowsill. This was then rendered and painted to match the existing. A new window was then introduced to match the dimensions and style of other windows in the property and was custom made and installed in the space. This has in effect reintroduced a window that was previously replaced with a door. It has therefore re-established the historic configuration.
- 4.1.14 The fire door, now located at the corner, was relocated from its former position on the Leigh Street elevation. It has replaced the window in this position. This required the removal of the windowsill and the wall below. This work did not impact on any historic fabric as the wall below the windowsill was built using blocks and plastered using plasterboard, when an old recessed door had been removed to insert the previous window, which was also non-original. This window was a later replacement 4 over 4 horned sash window (see Fig. 22 in the Heritage Statement).
- 4.1.15 As above, this has resulted in the external elevations being returned to their earlier more historic configuration.
- 4.1.16 As a result of the change of use from house to a hostel and later hotel the original layout and fixtures and fixtures associated with the earlier house were largely stripped out and reconfigured. This has meant that the significance of this building is largely derived from the architectural value of its external elevations, and its group and streetscape value as part of a wider architectural composition, as well as its historical value.
- 4.1.17 The proposed works are considered to have resulted in no harm to any attribute that contributes to the significance of this property and its rationale for designation. The works have been limited in scale and restricted in nature and have also only affected non-original fabric and a much-altered internal configuration. In addition, the works have been undertaken to comply with fire safety, this is both wholly appropriate given the building use but also important in terms of reducing risk to the significance of this building through loss by fire. As a result, the proposals will result in no harm to the setting of the listed building or impact on the character and appearance of the conservation area and fully comply with policies D1 and D2 of the Local Plan.

4.2 Amenity

4.2.1 Due to the nature of the works undertaken, the alterations have improved and ensured better health and safety conditions for employees and current and future visitors of the subject property which operates as a hotel. The proposal will not have an impact on neighbouring amenity by way of overlooking or loss of privacy as no new external openings have taken place. The proposal therefore complies with policies D1 and TC4 of the Local Plan.

4.3 Access

4.3.1 The Site is in a highly accessible location and has a PTAL rating of 6b. There are a number of bus stops at Euston Road, whilst Kings Cross and Euston tube stations, and Euston, St Pancras and King's Cross stations, are all within walking distance. The area is also well served by open spaces with Cartwright Gardens, Tavistock Square and Corams Fields Pitches all located within 1km of the site.

4.3.2 As part of the changes required by the LFB in their Enforcement Notice dated 16th October 2019 (see **Appendix A**), the applicant was required to ensure adequate emergency routes and exits, for use by relevant persons in the premises, are available and can be safely and effectively used at all relevant times. This can be achieved by:

1. Either removing the open reception booth or reconstructing the booth with fire rated material (to provide at least 30 minutes fire resisting integrity).
2. Providing two suitable door lobby protection to the kitchen and Bedroom 1, located directly onto the stairwell at basement level. An alternative solution maybe considered within the fire risk assessment.

4.3.3 Accordingly, the works have been undertaken to comply with fire safety, which is a key planning consideration in terms of reducing risk to the significance of this building through loss by fire.

5 Conclusion

5.1 Conclusions and Recommendations

- 5.1.1 The NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. This statement has identified the heritage assets with a potential to be sensitive to the proposed works, it has considered their significance and assessed the impacts of the proposed works on their significance.
- 5.1.2 The heritage assets considered to be sensitive to development have been identified as the subject property (1 Leigh Street), which is a listed building in the Bloomsbury Conservation Area.
- 5.1.3 Retrospective LBC is being sort for minimal internal works and the relocation of a basement window and door. The works were undertaken based on requirements set by London Fire Brigade (LFB) with respect to fire safety.
- 5.1.4 The Heritage Statement assessment has confirmed that the subject property had experienced notable change over time, including its original conversion from a house to student hostel and later hotel. As a result, internally no fixtures and fittings of historic or architectural interest survived prior to the works subject to this application having been undertaken. As a result, the internal works have resulted in no harm to any attribute that contributes to the significance of the listed building. The only external works undertaken have been the relocation of an existing fire door to the location of a former corner window and the replacement of the former fire door with a new window to match. This work has in effect resulted in the reconfiguration of an earlier more historic arrangement to the basement and has not impact on any fabric or fixtures of architectural or historical interest. Indeed, the reconfiguration to an earlier form can be considered an enhancement.
- 5.1.5 The proposed works will therefore result in no harm to any aspect of the building that contributes to the significance of the grade II listed terrace or the wider Bloomsbury Conservation Area. As a result, the proposed works are believed to be in accordance with all relevant national and local planning policy.

Appendix A

**Copy of LFB Enforcement Notice dated 16th October 2019 and
Extension of Time in respect of Enforcement Notice dated 6th
January 2020**