

Planning & Heritage Statement

In respect of

Alterations and additions to existing hotel

at

Double Tree by Hilton Hotel – London West End 92 Southampton Row London WC1B 4BH

On behalf of

Southampton Row Hotel LLP

USP1006 April 2021



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1 INTRODUCTION

- 1.1 This planning application has been submitted on behalf of Southampton Row Hotel LLP for internal configuration to create 11 guest rooms, creation of new lightwells to ground and lower ground levels, removal of existing roof lanterns, plant, AHU and external ventilation shaft from ground floor roof and creation of mezzanine level to provide the upper floor accommodation for 2 x duplex rooms at the Doubletree by Hilton Hotel, 92 Southampton Row, London WC1B 4BH.
- 1.2 This established hotel operation provides accommodation for business visitors and tourists in this highly accessible location which is nearby various public transport routes, as well as a number of tourist attractions and business facilities. The property is located within the Bloomsbury Conservation Area, but is not listed.
- 1.3 The proposal relates to the existing hotel (C1 Use Class) and seeks to improve underutilised space at lower ground and ground floor. The hotel has undergone internal refurbishment which has reconfigured the back of house and support accommodation at these levels. As a result the areas of back of house accommodation and meeting rooms to the north side of the ground and lower ground levels are no longer required to serve the hotel and are redundant. It is therefore proposed to make better use of this accommodation and provide additional hotel rooms as part of the overall hotel use.
- 1.4 To facilitate the creation of these rooms the scheme will involve internal changes to the layout at this level and the provision of three new lightwells providing daylight to the accommodation to these levels and replacing the current large roof lantern structures above the ground floor roof level in this location. Two of the lightwells will extend to ground floor, with the third extending to lower ground level.
- 1.5 The proposals also aim to consolidate the existing plant equipment, to tidy up the ground floor roof element to the north side of the hotel and improve the external appearance of this part of the hotel. The proposal will remove the existing plant and equipment from the roof, including the large AHU, ducting and ventilation shaft which runs up the side elevation of the building to roof level. These elements would no longer be required due to the internal changes which have been undertaken within the hotel and the proposal provides the opportunity to remove these from the property. The large roof lantern structures to this roof would also be removed.
- 1.6 The western part of the roof, which currently contains the large roof lanterns and is within the lightwell area between the main part of the hotel building and Ormonde Mansions (to the north), will be retained at the current level and finished with a new single ply membrane to tie in with the existing roof finish, providing an open and clear roof level. The north eastern part of the roof, which is located beyond the rear of Ormonde Mansions and contains an array of plant and equipment which is to be removed, will replace this plant with a new mezzanine level. This mezzanine will provide the upper floor of two units to be provided at ground floor level, creating the two duplex rooms. The majority of the new mezzanine level will be located below the level of the current roof within the existing built envelope of the building, with n new element rising above the roof replacing the plant elements and extending to the level of the current parapet roof.



- 1.7 The proposals have been developed following the refusal of planning permission for a larger scheme, which proposed more extensive works and built form above roof level, including within the lightwell area between Ormonde Mansions and the main hotel building. The reasons for refusal and consultation comments have been reviewed and considered in full and the proposed scheme developed with input from the architects and daylight/sunlight consultants to address the previous concerns.
- 1.8 The proposed scheme significantly reduces the new extent of built form, removing new development from the "lightwell" area between Ormonde Mansions and main hotel building. It limits extensions to the building to areas to the rear beyond Ormonde Mansions where it will replace existing plant, removing visual clutter and improve the use and appearance of this part of the building within the current parapet height.
- 1.9 This Planning Statement sets out the key planning policies in relation to the site, summarises the additional work and information that has been undertaken and included in the application and assesses the proposal against the Development Plan policies and NPPF.



2 SITE AND SURROUNDING AREA

- 2.1 The Hotel is located on Southampton Row and is a long established 4* hotel operation providing 281 hotel rooms, together with associated restaurant, bar and meeting facilities for guests. The site is all within a C1 Use Class.
- 2.2 The property is in an area of mixed character, which includes a range of hotels, office accommodation, education establishments, retail provision at ground floor and some residential uses, including Ormonde Mansion adjacent to the north.
- 2.3 The hotel is a 7-storey building on Southampton Row and consists of elements fronting Southampton Row to the west and Old Gloucester Street to the east, with two principal wings running west to east between these two frontage elements. Between these wings accommodation is provided at ground and lower ground level, resulting in accommodation at these levels across the full extent of the site.
- 2.4 The proposed area of works is to the north of the property and is contained behind both the Southampton Row and Old Gloucester Street elements, and no changes are proposed to these frontages. As such there are no views from the surrounding streets of the area where the external works are proposed.
- 2.5 The proposal relates to lower ground and ground floor levels which contain redundant back of house and meeting facilities which are no longer required as part of the hotel operation, and the ground floor roof which currently contains large roof lanterns, elements of plant and machinery, including a large AHU, ducting and ventilation shaft which runs up the side of the building to roof level.
- 2.6 The property is within the Bloomsbury Conservation Area, with the Conservation Area Appraisal (2011) noting Southampton Row to be a busy arterial route which contrasts with the character of the rest of the sub area. The townscape is of a larger urban grain and is essentially commercial in nature, with a selection of later 19th and 20th century buildings.
- 2.7 The Conservation Area Appraisal also notes that Southampton Row is well known for its hotel buildings, an important function in Bloomsbury. It states that the recently restored Bonnington Hotel is a notable example of an Edwardian hotel building. Situated at No 93, it has a wide brick frontage with neo-classical proportions and stone dressings.
- 2.8 The property is in an accessible location, benefitting from good public transport links with a PTAL of 6b. The hotel is within close and easy walking distance of Holborn tube station providing access to the Piccadilly Line and Central Line. Euston, Kings Cross and St Pancras National Rail stations are all within a 15 minute walk. There are also several bus stops located on Southampton Row, outside the entrance of the hotel, serving a variety of routes. The site is also readily accessible by walking and cycling, with good well-maintained pedestrian routes connecting the site to the wider area. The site is located close to a number of tourist attractions, as well as offices and conference venues, and as such the hotel provides for both business and tourist visitors.



Planning History

- 2.9 The 'Doubletree by Hilton' has operated from the hotel since 2009. Formerly the hotel was known as the Park Inn and the Boddington Hotel.
- 2.10 The property has been the subject of a number of applications for improvements and refurbishment since 2009. These include:
 - replacement of the entrance canopy granted in 2010 (2010/2069/P);
 - conversion of lower ground meeting rooms, ground/first floor plant and staff accommodation to provide 10 guest rooms with the creation of lightwells and associated alterations granted in 2014 (2014/1583/P);
 - demolition, reconfiguration of the 4th and 5th floor of Old Gloucester Street, and additional 4th floor to link buildings granted in 2016 (2015/7269/P);
 - erection of 1st to 3rd floor rear extension to provide additional 3 bedrooms around lightwell granted in 2019 (2018/0825/P).
- 2.11 Planning permission for double storey rear and side infill extensions at ground and first floor level and provision of 11 guest rooms at ground floor level was refused in February 2019. The reasons for refusal and consultation comments have been reviewed and considered in full and the proposed scheme in this application has been developed with input from the architects and daylight/sunlight consultants to address the previous concerns.

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3 PROPOSED DEVELOPMENT

- 3.1 The proposal reuses existing back of house and support accommodation within the current hotel building which is now redundant, and makes internal changes to the layout of the ground and lower ground floor level to provide additional hotel rooms.
- 3.2 The existing site is in C1 Hotel use and the proposal does not propose any change of use.
- 3.3 To facilitate natural light to the new rooms three new lightwells are to be provided. Two will extend to ground level, with one extending to lower ground floor.
- 3.4 The proposal includes the removal of the large roof lanterns at ground floor roof level in this location. The roof will be made good in this location and reroofed in a single ply membrane in mid/dark grey to tie into the existing roof finish.
- 3.5 In addition, the proposal includes the removal of the plant and equipment that is currently located on the eastern part of the ground floor roof in this location. The existing AHU, ducting and ventilation shaft which runs up the full extent of the side of the building to the roof will all be removed from this area. These elements of plant are removed due to the changes undertaken to ground floor which means that these elements of servicing are no longer required or are now internalised within the building.
- In this location a small addition will be constructed to replace the plant and equipment currently positioned in this area. This built form will sit within the height of the existing parapet in this location and will enable the provision of an upper level to two hotel rooms being created at ground floor. The majority of this mezzanine accommodation will be delivered within the envelope of the current building, with the addition providing the completion of this accommodation in place of the existing plant. The proposal will be constructed of London Stock bricks to match the predominant external material of the hotel. The small additional built form will therefore match the current appearance of the hotel and provide an improved visual appearance compared to the existing plant and equipment to be removed from this location.
- 3.7 No changes are proposed to the frontages of either Southampton Row or Old Gloucester Street.
- 3.8 The proposal will not result in any changes to the servicing of the hotel.
- 3.9 Overall the proposal will provide an additional 11 hotel rooms.



4 PLANNING POLICY

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be considered in accordance with the statutory Development Plan and other material considerations.
- 4.2 The National Planning Policy Framework (NPPF), updated in 2019, forms the national planning policy guidance document, and is supported by the National Planning Practice Guidance, which is an online resource.
- 4.3 The Development Plan for Camden consists of the London Plan (2016) and the Camden Local Plan (2017).

National Planning Policy Framework (2019)

- 4.4 The NPPF includes a requirement on local planning authorities to plan positively for growth.
- 4.5 The purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 sets out three overarching objectives:
 - a) An economic objective to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right times 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 support communities, health, social and cultural well-being;
 - An environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.
- 4.6 Paragraph 80 supports economic growth and productivity, and gives significant weight to local business needs. Paragraph 117 states that planning policies and decision should promote an effective use of land.
- 4.7 Paragraph 124 identifies good design as being a key aspect of sustainable development, paragraph 127 highlights the need to ensure the amenity of existing and future users, and paragraph 184 recognises the importance of conserving the historic environment.

Camden Local Plan (2017)

- 4.8 The site is located in the Central London Area and a Conservation Area as identified on the Local Plan Policies Map. The following policies are relevant to the application:
 - G1 Delivery and Location of Growth
 - E1 Economic Development



- E3 Tourism
- D1 Design
- D2 Heritage
- A1 Managing the Impact of Development



5 PLANNING & HERITAGE APPRAISAL

- 5.1 The majority of works result from internal alterations to the layout of the existing building, reusing vacant and redundant back of house and meeting space to provide hotel rooms. The use of the property remains within Use Class C1 and there is no change of use.
- 5.2 To facilitate these improvements and beneficial reuse of this space within the hotel some external physical alterations are required to the building. This includes the introduction of additional lightwells, removal of existing roof lanterns and making good of the existing roof, removal of existing plant, machinery and ducting and provision of a small addition within the height of the parapet. The planning and heritage considerations of these elements of works are considered below.

Principle of Development

- 5.3 Policy G1 of the Camden Local Plan identifies that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's needs and harness the benefits for those who live and work in the borough. It supports the delivery of growth through high quality development and promoting the most efficient use of land and buildings.
- Policy E1 seeks to deliver a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. It supports businesses of all sizes and recognises the importance of leisure and tourism to the economy and employment generation. The supporting text highlights that the visitor economy in Camden provides around 16,500 jobs in the borough, 10% of all tourism related employment in Inner London and is worth £566 million per annum.
- 5.5 London Plan Policy 4.5 supports London's visitor economy and encourages Borough's to stimulate growth. Policy E3 of the Local Plan recognises the importance of the visitor economy in Camden and supports tourism development and visitor accommodation. New tourism development and visitor accommodation is to be located in Central London. Visitor accommodation is to be easily reached by public transport, provide pick up and set down points, maintain and balance the mix of uses in the area, local character, residential amenity, services, the environment and transport system, and not lead to a loss of permanent residential accommodation.
- 5.6 A key part of the borough's role as set out in the Development Plan is providing opportunities for economic growth, investment and additional employment. The London Plan and Local Plan support tourism, with a recognition that the visitor economy is a significant generator of employment and investment in the borough. The provision of good quality and accessible visitor accommodation, important to supporting and providing access to the range of key cultural, visitor and business attractions located within the borough is essential to support tourism and business in the city.
- 5.7 Policies G1 and E1 of the Local Plan support growth in the borough, particularly within Central London, supports making the most efficient use of land and buildings and supports existing businesses and employment generation.



- 5.8 The importance of visitor accommodation and contribution that the refurbishment and extension of existing hotels can make to hotel provision is highlighted in the London Plan, with Local Plan Policy E3 providing a positive approach to additional hotel accommodation within accessible central London locations such as the application site.
- 5.9 Whilst the COVID-19 pandemic has resulted in a short term reduction in hotel use, it is anticipated that the reduction in restrictions from 2021 onwards will result in a return to hotel accommodation demand, as well as an increased need for hotel rooms to cater for additional business use by those who are no longer living and working in the city on a full time basis.
- 5.10 The site is located in a highly accessible central London location, within easy walking distance of services and facilities, businesses and cultural and tourism attractions. The site is also highly accessible by public transport options, providing sustainable transport options across the city and beyond.
- As identified in the Conservation Area Appraisal, Southampton Row is well known for its hotel buildings, an important function in Bloomsbury. The scheme makes use of redundant and underutilised back of house and support accommodation, converting the existing floorspace to provide additional rooms. The proposal also removes existing unsightly external plant and equipment, and large protruding roof lanterns, making good the roofs of these areas and providing a small extension to the rear part of this ground floor roof to deliver rooms in place of the current external plant. The proposal will therefore provide additional rooms within an existing high-quality hotel, making more efficient use of the land and building, and improving the appearance of the building.
- 5.12 The proposal will deliver additional hotel bedrooms to this existing hotel, which is in an accessible central location, in close proximity to a number of tourist attractions and business destinations. The proposal will not result in the loss of any existing residential accommodation and will assist in maintaining the hotels commercial viability. The proposals will be serviced from and operate as part of the existing hotel and will assist in meeting the borough and the city's need for visitor accommodation. The principle of additional hotel accommodation associated with the current hotel in an area characterised by a mix of uses, including hotel accommodation, is therefore supported by the London Plan and Local Plan policies G1, E1 and E3.

Design & Heritage

- 5.13 Policy D1 of the Local Plan seeks to secure high quality design in development. Development should respect local character and context; preserve or enhance the historic environment and heritage assets; comprise details and materials that are of high quality and complement the local character; is inclusive and accessible; and carefully incorporates building services equipment.
- 5.14 Policy D2 of the Local Plan relates to heritage and requires developments to preserve, and where appropriate, enhance heritage assets and their settings, including conservation areas. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. In conservation areas development be required to preserve, or where possible, enhance the character or appearance of the area.



- 5.15 The scheme largely makes use of existing floorspace, which is no longer required for its previous functions, and makes use of this accommodation to provide additional hotel rooms. Three new light wells are inserted into the existing building to provide improved light levels to these rooms, replacing the large roof lanterns that currently protrude above the ground floor roof in this area currently. The light wells proposed will have no additional external manifestation, being formed of openings within the roof with no additional protruding elements or structure above the ground floor roof. Where the existing roof lanterns are removed from the western part of the roof, closest to Ormonde Mansions, the roof will be made good at its current level and finished with a single ply membrane roof tying into the existing roof finish and providing a consistent, clear and uncluttered appearance. No new additions are proposed within the 'light well' area between the hotel and Ormonde Mansions.
- 5.16 To the eastern part of the ground floor roof the current plant and equipment will be removed. The large air handling unit, duct work and vent will be removed as part of the works. This equipment is either no longer required as the support accommodation functions in the levels below are removed, or is internalised within the building. A small extension is proposed to the rear of this area, furthest from Ormonde Mansions, which will extend 1.5 metres above the ground floor roof in the location of the current plant to be removed. The extension will however sit below the height of the existing parapet in this location.
- 5.17 The heritage significant of this undesignated heritage asset is its contribution to the character and appearance and setting of the Conservation Area. The character of the conservation area in this location, as set out within the Conservation Appraisal is the large scale, largely commercial, urban grain; its brick frontages, proportions and detailing; and use of brick and stone materials.
- 5.18 The proposal will replace the existing plant and equipment. It will not add any additional bulk in this location given the removal of the existing structures. The form, scale and design of the small extension has been designed taking account of the surrounding properties, the design and materiality of the building and neighbours, and the characteristics of the building and conservation area.
- 5.19 The character and appearance of the roof and building will be improved by replacing the unsightly and exposed plant and machinery with a small brick extension which will match the material of the existing hotel and sit below the parapet in this location. The proposals are not visible from within the streetscene, but will improve the appearance and outlook in private views and from the windows of surrounding properties. The proposal will not be visually prominent but will represent an enhancement of the appearance of the building, and the character of the conservation area as a result.
- 5.20 The extension is of a high architectural quality, meeting the functional requirements of new hotel accommodation and providing good quality new rooms responding to the buildings use and form. The design respects the local character and context, enhances the building and appearance of the historic asset and improves the building services arrangements. The proposal does not result in any harm to the either the undesignated heritage asset or the Bloomsbury Conservation Area, or setting of surrounding positive contributors, but will enhance the character and appearance of the area. The proposal is therefore compliant with policy D1 and D2 of the Local Plan and NPPF.



Amenity

- 5.21 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. It confirms that planning permission will be granted for development unless this causes unacceptable harm to amenity. Factors that will be considered include: visual privacy, outlook; sunlight, daylight and overshadowing; artificial lighting levels; transport impacts, construction phase impacts including the use of Construction Management Plans; noise and vibration levels.
- 5.22 The proposal will improve the outlook from surrounding properties. The scheme removes the large roof lanterns from the western end of the ground floor roof in this location, closest to Ormonde Mansions, and makes good the roof with a clear and unobstructed roof at the existing level. To the eastern end, beyond the rear of Ormonde Mansion, the proposal removes the existing large AHU, servicing equipment and ducting. The replacement built form, finished in materials to match the existing hotel and set below the height of the current parapet wall in this location, will improve the finish and visual appearance of this part of the roof from surrounding properties, without providing additional massing.
- 5.23 The proposals do not result in any loss of light or overshadowing. The scheme removes structure from the western part of the roof closest to Ormonde Mansions, remove potential obstructions, whilst the built form proposed to the eastern part of the roof replaces existing plant and machinery, and will not provide additional bulk and sits below the height of the parapet wall in this location, which is to be retained.
- 5.24 The proposal will not result in any additional loss of privacy or overlooking, as there are limited new opening proposed, and where these are located they are positioned with existing parapet walls preventing views to surrounding windows.
- 5.25 The proposal reduces artificial light spillage through the removal of the large roof lanterns that previously covered the majority of the western part of the roof and served the accommodation below.
- 5.26 The proposal will not result in any adverse transport impacts. The Transport Statement submitted demonstrates that the additional 11 rooms will result in a negligible impact on the surrounding transport network when considered in relation to the current 281 rooms within the hotel, and the existing usage of the transport network. The site is in a highly accessible location, with local facilities, services and attractions within close walking distance, and a variety of public transport options connecting the location to the wider city and beyond.
- 5.27 Details of construction management are set out in within the Design and Access Statement. The plan aims to minimise the affect of construction works on neighbours and proposes measures to reduce the effects of the works. The majority of works and activity is to take place within the hotel, whilst the scheme minimises the need for any external cranes or scaffold. Welfare facilities will also be provided within the hotel to remove the need for external cabins and activity. Working hours will follow current Council requirements.
- 5.28 Deliveries will take place from Old Gloucester Road, via the existing service entrance into the Hotel. The external area of works above the ground floor roof will be fully enclosed with a temporary opaque enclosure to minimise dust. Best practice will be followed and noise and dust



mitigation measures employed in relation to works to remove existing external structure and equipment.

- 5.29 The contractor will be required to sign up to the Considerate Constructors Scheme and follow guidance within Camden's Considerate Contractors Manual. A full Construction Management Plan, including the Council's Construction Management Plan Pro-Forma will be completed and agreed with the Council prior to the commencement of works on site.
- 5.30 The proposal will ensure adequate living standards are maintained in this urban city environment for existing occupiers of the neighbouring properties and the scheme is therefore compliant with Local Plan policy A1.



6 CONCLUSION

- 6.1 The proposals will deliver 11 additional hotel rooms to the current hotel operation, assisting to meet additional need for visitor accommodation within London. The location is highly accessible and in close proximity to a number of major visitor attractions and business facilities, with the hotel utilised by tourist and business guests. The proposal utilises existing accommodation making more effective use of the building through the reuse of this redundant and underutilised area of back of house and support accommodation. The proposal also removes and replaces existing roof lanterns and plant equipment on the ground floor roof, providing an improved appearance and character to the building and conservation area. The proposal makes effective use of the site and represents sustainable development.
- 6.2 The works are contained within the site, with no views from the surrounding streets. The small element of extension to the roof is of a high architectural quality, responding to the buildings use and form, and is sited within the existing parapet in this location. The character and appearance of the roof and building will be improved by replacing the unsightly and exposed plant and machinery with a small brick extension which will match the materials of the existing hotel and sit below the parapet in this location. The proposal does not add any additional bulk in this location given the removal of the existing structures. This revised proposal therefore fully addresses Reason for Refusal 1 of application 2019/6435/P.
- 6.3 The design respects the local character and context, providing an improved appearance which is more sympathetic than the current structures, and enhances the host building and its appearance within its surroundings. The proposal does not result in any harm to the either the undesignated heritage asset or the Bloomsbury Conservation Area, or setting of surrounding positive contributors, but will enhance the character and appearance of the area. The proposal enhances the character and appearance of the property and is compliant with policy D1 and D2 of the Local Plan.
- 6.4 This amended proposal does not propose any new external bulk and massing within the 'lightwell' area between the side of the hotel and Ormonde Mansions. The roof to the western part of the ground floor in this location is to have the current large roof lanterns removed with the roof made good at the current level. The proposal will provide a clear and unobstructed roof as viewed from the surrounding properties. The small extension to the eastern end of the roof, furthest from Ormonde Mansions sits below the existing parapet and replaces the current plant and equipment. In place of the exposed plant and ducting the proposal provides a small extension in materials to match the current hotel. Overall the proposals will therefore reduce the bulk and scale of roof elements across the roof, providing a small built element in matching materials to the hotel and replacing the plant, and improving the outlook from the neighbouring properties. The proposals will not result in any increased sense of enclosure as the new extension sits within the current height of the parapet in this location and replaces the existing plant, whilst the current large roof lanterns protruding above roof level will be removed. The proposals are compliant with Policy A1 and the revised scheme fully addresses Reason for Refusal 2 of application 2019/6435/P.
- 6.5 The application delivers additional accommodation to support the current use in a highly accessible central location and the proposals will not have any material harmful impact in respect



of character and appearance of the building or conservation area, or the amenity of surrounding properties. As such the proposal is compliant with Policies G1, E1 and E3 of the Local Plan and is in accordance with the London Plan and NPPF, and represents sustainable development.