

17 February 2022

F.A.O Mr Obote Hope
Planning Department
2nd Floor
London Borough of Camden
5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

Sent by email to planning@camden.gov.uk

The Savills logo consists of the word "savills" in a red, lowercase, sans-serif font, positioned on a solid yellow rectangular background.

Amelia Hunt
E: amelia.hunt@savills.com
DL: +44 (0) 7815032068

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Mr Hope,

Application for Full Planning Permission
County Hotel, 8-11 Upper Woburn Pl, Bloomsbury, London WC1H 0JW
Planning Portal Reference: PP-11006396

I write on behalf of Splendid Hospitality Group, to submit an application for full planning permission for works to the above-named site. The full description of development is as follows:

"Proposals for the installation of rooftop plant; the erection of the new substation and the replacement boundary wall; and removal of redundant goods lift."

The planning application submission has been made via the Planning Portal and includes the following documentation in addition to this cover letter:

- Application Form prepared by Savills;
- CIL Form prepared by Savills;
- Site Location Plan prepared by Axiom Architects;
- Design and Access Statement prepared by Axiom Architects;
- Existing and Proposed Plans, Elevations and Sections, prepared by Axiom Architects;
- Acoustic Report prepared by Scotch Partners;

The application fee of £462.00 + £28 Planning Portal Fee has been processed via the planning portal.

Site and Surroundings

The Site comprises the County Hotel (Use Class C1), which opened in the 1940's.

The County Hotel is immediately to the south and adjacent to the British Medical Association. It is situated on the corner with Upper Woburn Place and the pedestrianised Woburn Walk.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



The existing Hotel provides 175 guest rooms across 8 storeys. The basement and ground floors accommodate an ancillary bar, reception area, conference rooms, guest restaurant including office facilities and guest toilets at lower ground floor level.

The Site has an excellent public transport accessibility level (PTAL) of 6b (the best). Located centrally within the London Borough of Camden, along Upper Woburn Place, which is a busy north-south through road with high traffic volumes and equally high pedestrian footfall. Woburn Walk east of the site, in contrast, is a quiet pedestrian street running east from Upper Woburn Place through to Duke's Road. At its west end, Woburn Walk is bounded by tall buildings.

The site is located within Bloomsbury Conservation Area. The hotel is not statutory listed. However, the property is identified as making a positive contribution to the Bloomsbury conservation area. The site is surrounded by a number of statutory listed buildings such as:

- Nos. 2-16, Dukes Road (Grade II* Listed), Nos. 1-9 and 9A, Woburn Walk (Grade II* Listed) and; Nos. 4-18 and 4A-18A, Woburn Walk (Grade II* Listed);
- British Medical Association House (Grade II Listed); and
- Hilton Hotel London Euston (Grade II Listed).

An accompanying Heritage Assessment prepared by Savills Heritage provides further detail on the buildings, their significance and the impact of the proposed development. This is included within the accompanying Design and Access Statement.

Planning Policy Framework

The currently adopted planning development framework comprises the following documents:

- The London Plan (2021);
- Camden Local Plan (2017)

Under the current Local Plan, the site is designated as follows:

- Bloomsbury Conservation Area
- Flood Zone 1
- Located in Primrose Hill Point 4A.1 to St Paul's Cathedral Viewing Corridor
- London Panorama: Greenwich Park Viewing Corridor
- Located adjacent to the Metropolitan Walk

The following list comprises some of the key additional material considerations further to the above:

- The National Planning Policy Framework (NPPF)(2021).
- The National Planning Practice Guidance (NPPG) (2021)

We are aware of Camden's Planning Guidance Documents and consider the following documents most relevant to this proposal:

- Access for All CPG - March 2019
- Amenity CPG - March 2018
- Design CPG - March 2019
- Developer Contribution CPG - March 2019
- Employment sites and business premises CPG - March 2018
- Energy efficiency and adaptation CPG - March 2019
- Interim Housing CPG - as amended March 2019
- CPG 2 Housing - as amended March 2019
- Transport CPG - March 2019

Planning History

A planning history review of the Site has been undertaken using the online planning application records. A full summary is included in **Appendix 1** of this letter. The planning history primarily relates to smaller alterations and advertising around the base of the building and is not considered to be of much relevance to the current proposals.

Previous Engagement

Whilst for a more significant proposal to extend to the hotel to the rear of the site up to the site boundary with Woburn Walk, an initial pre-application meeting was held on 5th November 2020, in which Officers advised that the proposed extension along Woburn Walk should be revised. The following comments were made:

- The extension should not only improve the internal connections.
- Proposed extension does not consider its setting.
- Quality design should be considered for this extension as it is part of the conservations area

Following this initial meeting, the scheme was revised and the design team submitted an addendum at the beginning of December, with the revised proposal for the Ground floor extension along Woburn Walk. This option was then discussed during the meeting held on the 18th of January with the Camden conservation officer.

Proposals were further revised and the final pre-application meeting was held with Camden officers in January 2021. Written feedback was issued, in which the following points were raised:

- The proposed hotel use was considered acceptable, and while it was noted that the mixed-use Policy H2 should apply, it was considered that the configuration and use of the site would make it difficult to accommodate housing successfully on-site, and so the proposed use of the extensions for hotel use only was accepted.
- The additional height on the building was considered generally acceptable as it is in keeping with the scale of buildings in the surrounding area and has very limited visibility.
- It was advised that the proposed mansard be refined, and a more traditional approach using slates would be preferred. The windows could be more elegant, with slimmer cheeks to help the extension blend into the existing architecture of Bloomsbury.

- The Council's Conservation Officer reviewed revised proposals for the two-storey and was not convinced by the fenestration of the rear extension, suggesting further thinking towards this aspect of the proposal.
- Officers had no objection to the proposed gate, and the removal of the existing service lift from the front elevation was welcomed.
- It was not anticipated that the proposed two-storey extension along the rear elevation would have any impact on the neighbouring dwellings. However, it was noted that the proposed development may result in overshadowing of these properties.

Overall the proposals were supported by officers, however, for commercial reasons these proposals were not able to be progressed to the planning stage.

Proposed Development

Following the aforementioned positive Pre-Application consultation with Camden Borough Council in 2020, for the proposed extension of the hotel, the leaseholder, Splendid Hospitality Group, has opted to forgo the extension of the building in favour of a more straightforward internal refurbishment.

The hotel does not currently benefit from air conditioning and relies entirely on natural ventilation via opening windows. As part of the proposed upgrade works, an additional heating/cooling plant is required in the form of 14no. air source heat pump condensers and 3no. ASHP units for domestic hot water.

Existing windows are of the single glazed Crittall steel type and require refurbishment together with the addition of secondary glazing for improved energy efficiency and acoustic performance, considering the proximity to busy thoroughfares.

For safety reasons, it is appropriate to fix shut or restrict the opening of bedrooms windows, which will impact the efficiency of natural ventilation. The additional heating/cooling plant will place an increased loading on the power network and a new substation is required to facilitate this.

The comprehensive renovation works and full internal modernisation. As the majority of the renovation works will be internal and therefore unseen, and the building is not listed, planning permission is not required for these works.

In summary, planning permission is sought for the external changes which include the installation of the rooftop plant, the erection of a new rear substation and replacement boundary wall, and removal of goods lift in the front lightwell.

Planning Considerations

Design & Heritage

The principal heritage consideration is the potential effect of the proposals upon the setting and/or significance of the Bloomsbury Conservation Area and the heritage assets within. The Bloomsbury Conservation Area represents a period of London's early expansion northwards, dating from the Stuart period, which continued through the Georgian and Regency periods to around 1840. The significance of the Bloomsbury Conservation

Area as a heritage asset is derived primarily from its well-articulated townscape planning. Despite Bloomsbury's size and varying ownerships, its expansion northwards from roughly 1660 to 1840 has led to a notable consistency in the street pattern, spatial character and predominant building forms.

The below heritage assets have been scoped in light of any perceived visual shift in their setting as well as views to/from them:

1. Church of St. Pancras (Grade I listed)
2. 1-9 & 9A [and] 4-18 & 4A-18A Woburn Walk (Grade II* listed)
3. British Medical Association House (Grade II listed)
4. Hilton Hotel and attached Railings (Grade II listed)

As discussed above, the proposals seek to install a rooftop heating and hot water plant, erect a new substation at ground floor level incorporating a replacement boundary wall, and remove the redundant goods lift at the front of the hotel.

In greater detail, proposals for the rooftop plant seek to install 13 air conditioning condenser units for cooling, and 3 air-source heat pumps for hot water. These units will be screened by a new plant enclosure, with the chosen materials carefully considered to minimise the impact on the setting and character of the conservation area. Consequently, a grey louvred screen is proposed, which will be 2.1 metres in height, reducing both the noise and visibility of the plant. The proposed plant will also be sufficiently set back, with the existing building itself screening views of the new plant from the street level within the conservation area.

At ground level, within the rear lightwell adjacent to Wolburn Walk, a new substation, coupled with a replacement boundary wall is proposed. The units will be screened using materials that deliver a dark grey finish to best reflect neighbouring buildings, as per the original pre-application designs. This will see a combination of brick walls and an asphalt clad concrete slab roof. The louvred doors will allow a view through the replacement wall as to not create a solid form. These will also have a dark grey finish. The height of the proposed replacement wall will follow the height of the head of the existing shop windows and entrance floors, allowing the existing fascia and signage to remain prominent. This intervention has been designed with the surrounding conservation area in mind to protect and enhance the appearance and character. The existing boundary wall already provides partial screening of the proposed new substation, and with the improved replacement wall, views into this space from street level would be further reduced.

Additionally, removal of the existing goods lift within the front lightwell is proposed, with the existing slab extended to cover the void at the ground floor level. The location of the existing gated entrance at the pavement level will be removed and infilled to match the existing wall. Therefore, there will be no visual impact on the character and setting of the conservation area.

Having reviewed the above proposals in the views alongside our Heritage colleagues, it is considered that the proposals will cause no harm to the significance or setting of the Bloomsbury Conservation Area, factoring in the heritage assets within.

This is overwhelmingly owed to a lack of inter-visibility between the heritage assets and the Site. In relation to the Grade II* listed 1-18A Woburn Walk, there will be only a fragmentary shift in the visual perception of the streetscape, only evident from the west, with the proposed sub-station projecting only marginally over the boundary wall.

This minimal visual shift equally applies in relation to views from Cartwright Gardens, the perimeter of the new plant shown to project only a small fraction over the existing roofline. In relation to all other viewpoints, as assessed on VU. City, there will be no visual change whatsoever upon the setting of the heritage assets, namely the Church of St Pancras, Hilton Hotel and British Medical Association building, as well as the wider Bloomsbury Conservation Area, owing to the proposed development being almost entirely invisible to these; thus their historic-architectural coherency will be preserved.

Overall, it is considered that the proposals are minor in nature, sensitively designed and will not cause any harm in heritage terms to the conservation area or the setting of adjacent listed buildings.

Amenity

Noise Impact

An assessment has been undertaken of the expected noise impact from rooftop equipment which will be introduced at the site. The accompanying Acoustic Report has been submitted to support the planning application where greater detail on the findings of the aforementioned report can be found.

The rating level of plant noise is predicted to remain at least 10 dB below the background sound level during normal operation and at least 1 dB below the background sound level when all of the plant is operating simultaneously at maximum duty. This maximum duty scenario is very unlikely to occur in practice.

It is concluded that, when operating at or below the proposed duty limit, the plant at The County Hotel is predicted to have the Lowest Observable Adverse Effect Level at all applicable noise-sensitive receivers and therefore comply with the Local Authority's anticipated conditions.

Access

Access to the hotel for guests and staff will be unchanged by the proposed development. Disabled access to all parts of the hotel including The Resting Hare public house can be made via the main entrance of the hotel off Upper Woburn Place.

Existing lifts will be upgraded to improve accessibility including converting one lift for emergency escape use. Access to the rooftop plant will be restricted to maintenance staff via the eighth-floor plant room. Access to the substation will be restricted to persons who are specifically authorised to enter a high-voltage zone. The replacement boundary wall and security fence flanking the entrance to the substation ensure that members of the public cannot stray into the substation in accordance with the Electrical Safety, Quality and Continuity Regulation 2002. There is no requirement for a substation to be designed with access for the disabled.

Conclusion

In summary, planning permission is sought for external changes alongside an internal refurbishment which include the installation of the rooftop plant, the erection of a new substation and replacement boundary wall, and removal of goods lift.

As described above, the proposed alterations will form part of the extensive refurbishment of the County Hotel, ensuring a viable future for a building in a prime location that contributes to the character of the Bloomsbury Conservation Area.

The proposed development is considered to be minor and it has been carefully considered to ensure no harmful impact on neighbouring listed buildings or the Conservation Area.

We would be grateful if officers could confirm receipt of the planning application and requisite fee. We look forward to confirmation that the application has been validated without delay.

Should you have any queries regarding the submission of the planning application, or any matter in respect of the planning application, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in dark ink, appearing to read "Savills" in a stylized, cursive script.

Amelia Hunt
Savills

Appendix 1 – Planning History

Reference:	Description:	Decision:
2015/1322/P	Details of acoustic screens, balustrade, gate and fence details required by condition 4 of planning permission 2014/4201/P dated 1st December 2014 for: (Installation of new shopfront to the rear section of the building to Woburn Walk elevation with associated entrance, external decking, access stair and railings for use by the ancillary restaurant following the conversion of the existing conference room in association with the existing hotel use and the display of 3 x non-illuminated advertisement to the front and side elevations)	Granted 20-04-2015
2014/4202/A	Advertisement consent to display 3 x non -illuminated signs.(Revised)	Granted 01-12-2014
2014/4201/P	Installation of new shopfront to the rear section of the building to Woburn Walk elevation with associated entrance, external decking, access stair and railings for use by the ancillary restaurant following the conversion of the existing conference room in association with the existing hotel use and the display of 3 x non-illuminated advertisement to the front and side elevations.	Granted 01-12-2014
PS9804505	Siting of two public payphone kiosks. (Plans submitted).	Agreed in default (telecoms) 29-05-1998
PS9705011	Siting of one public payphone. (Plans submitted).	Agreed in default (telecoms) 23-09-1997
AD858	The retention in Woburn Walk of two non-illuminated single-sided directional signs measuring 1'6" (0.48m) x 9" (0.25m) in stainless steel with black and blue lettering with their lower edges 7'6" above ground level.	Permission 21-09-1978
CA1404/A	A non-illuminated single-sided directional sign having black letters to read "JOHN THOMPSON LTD" with black arrow on a stainless steel ground, fronting Woburn Walk. Overall length 1'6" (0.48m), depth 9" (0.25m), overall height 8'3" (2.51m).	Registered 29-01-1970
AC186	An internally illuminated box sign crested over basement area, with white lettering and red outlines to the dimensions shown upon drawing submitted.	Permission 08-01-1951
AC49	The words "COUNTY HOTEL" in out letters illuminated with neon tube showing green, upon the flank wall giving on to Woburn Walk, of the County Hotel, Upper Woburn Place.	Permission 14-09-1949