

Planning & Design Statement

187 Bedroom Hotel

112A Great Russell Street, Bloomsbury

December 2022

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1. Introduction

- 1.1. This statement has been prepared on behalf of Central London Investments Limited in support of its planning application ('the Application') pursuant to Section 73 of the Town and Country Planning Act 1990 (as amended) in relation to planning permission ref: 2015/3605/P (referred to as 'the Original Application')¹, for a 166 room hotel at basement levels -4 & -5 at 112A Great Russell Street, London, WC1B 3NP. Planning permission was granted on appeal on the 4th November 2016 (PINS ref: APP/X5210/W/16/3147078).
- 1.2. This application seeks variations to conditions, fundamentally a minor material amendment to increase the number of bedrooms from 166 to 187 rooms (these changes are described in full at Appendix 1). The application also provides an enhanced level of information and detail, such that, if approved, the planning permission would not be subject to conditions requiring discharge (a schedule of suggested re-wording of relevant conditions is provided at Appendix 2).
- 1.3. The primary purpose of this statement is to assess relevant land use considerations.
- 1.4. Section 2 of the report provides the description of the application site and the surrounding area. Section 3 examines the planning context. Section 4 of this report establishes the decision making framework here. Section 5 reviews the proposal against relevant policies. Section 6 assesses other planning considerations. Section 7 concludes the Statement.
- 1.5. This statement should be read in conjunction with the Planning Statement (dated June 2015) which formed part of the Original Application, and the Planning Inspector's appeal decision letter (dated November 2016).

¹ Amended under NMA ref: 2020/1438/P

2. Description of Application Site and Surrounding Area

Site Description

- 2.1. The site is a component part of a substantial modern post-war building occupying an entire street block. It is bounded to the south by Great Russell Street, to the north by Bedford Avenue, to the east by Adeline Place and to the west by Tottenham Court Road.
- 2.2. The site predominantly comprises levels -4 & -5 of the basement of the building, which historically has been used as a pay and display car park, and which is currently undergoing conversion into a hotel.
- 2.3. The site entrances are located on Great Russell Street and Adeline Place. Tottenham Court Road is approximately 80 metres west of the junction of Great Russell Street and Adeline Place, and Bloomsbury Street is approximately 150 m to the east.
- 2.4. The site is surrounded by hotels, offices and small retail shops, with major retail on Tottenham Court Road. Immediately above the site is the St Giles Hotel which is accessed from Bedford Avenue. There is also a YMCA which is accessed from Great Russell Street, adjacent to the pedestrian entrance to the car park. To the east, there are hotels on Great Russell Street.
- 2.5. The existing building is not listed, and the site is not located within a conservation area. The site is however adjacent to the Bloomsbury Conservation Area and borders the Bedford Square/Gower Street and New Oxford Street/High Holborn/Southampton Row character areas. It should be noted that the site is not identified as contributing to either of these character areas.
- 2.6. The site is located within the Central Activities Zone (CAZ) as defined by the London Plan, and as such the surrounding area is characterised by a mix of uses including commercial, residential, cultural and leisure uses.
- 2.7. The application site has an excellent level of accessibility, illustrated by a Public Transport Accessibility Level (PTAL) of 6b, which is the highest possible rating. The site is within close proximity of Tottenham Court Road Station which serves the Northern, Central Underground lines, and the recently opened Elizabeth line. In addition to this, the site is within close proximity of Goodge Street, Holborn and Russell Square Underground Stations offering further links to the Central, Piccadilly and Northern lines.
- 2.8. The site is also easily accessible by bus, being within close proximity of Tottenham Court Road.

3. Planning Context

The Original Permission

- 3.1. The application seeks an amendment to planning permission (ref: 2015/3605/P), allowed on appeal on 4th November 2016². The description of the consented development is as follows:

“Change of use of part ground floor and basement levels -4 and -5 from Car Park (sui generis) to 166 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place”.

- 3.2. Permission was granted subject to conditions and a s.106 agreement.

Amendment to the Original Permission

- 3.3. The original Consent has been subsequently varied via a non-material amendment (LPA ref: 2020/1438/P). Thus, the operative consent is to be understood with reference to both the aforementioned appeal decision letter and this NMA decision letter, in combination.

- 3.4. The amendment related to changing the description of development, simply omitting the reference to the number of hotel rooms. Thus the operative description of development is as follows:

“Change of use of part ground floor and basement levels -4 and -5 from Car Park (sui generis) to a hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place”.

- 3.5. With the consent of the NMA application, the decision notice introduced an additional condition (14), which states the following:

“The development hereby permitted shall not comprise more than 166 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission”.

- 3.6. This non-material amendment was made simply as a result of the ‘Finney’ ruling³ in November 2019. The upshot of this ruling is that it is unlawful for a minor material amendment to result in a proposal which is inconsistent with the operative part⁴ of the ‘parent’ planning permission. In this case, the minor material amendment involves increasing the number of hotel bedrooms to 187, and hence this would have

² Appeal Decision Letter at Appendix 3

³ Finney v Welsh Ministers [2019] EWCA Civ 1868

⁴ Operative part means the description of development in this context

otherwise been inconsistent with the reference to 166 rooms within the description of development within the appeal decision letter – hence the NMA removes the reference to the number of hotel rooms within the operative description of development.

First Minor Material Amendment Application and Appeal

- 3.7. Following the consent of the NMA application, an application for a minor material amendment to increase the number of bedrooms from 166 to 208 rooms was made in July 2020. The application was refused in April 2022 for the following reasons:

“1. The proposed increase in hotel bedrooms and associated reduction in communal and back of house space, including the reduced number of customer lifts, would result in the provision of poor quality visitor accommodation which fails to meet an acceptable standard of accessible and inclusive design contrary to policies C6 (Access for all) and D1 (Design) of the Camden Local Plan 2017.

2. The proposed increase in hotel bedrooms and associated reduction in back of house space by reason of increased levels of activity from servicing, some of which may have to take place on-street, an increased number of customers/guests and additional plant equipment would result in noise, disturbance and obstruction which would have an unacceptable impact on local amenity, contrary to policies A1 (Managing the impact of development), E3 (Tourism), T1 (Prioritising walking, cycling and public transport) and A4 (noise and vibration) of the Camden Local Plan 2017.

3. The proposed development in the absence of a Section 106 deed of variation to link this application to the parent permission's (Ref: 2015/3605/P) Unilateral Undertaking dated 13/10/2016, and including additional employment and training provisions, would fail to take account of its increased demands and impacts on the local and wider area and its population contrary to policies A1 (Managing the impact of development), E1 (economic development), E3 (tourism), CC1 (climate change mitigation), CC2 (adapting to climate change), T2 (parking and car-free development), T4 (sustainable movement of goods and materials) and DM1 (delivery and monitoring) of the Camden Local Plan 2017.”

- 3.8. An appeal against the refusal of this application has been lodged, including an application for costs. The present application is in effect a duplicate of this application, and has been made with the intention of securing a local permission for the additional rooms, without the need to undergo the full process of an appeal.
- 3.9. The first reason for refusal is addressed through the submission of an Accessibility Note by David Bonnett Associates. The Note demonstrates that the proposed development is compliant with the accessibility policies cited in the refusal notice.

- 3.10. To address the second reason for refusal, a Transport Note by TPP was submitted with the appeal. The Note included calculations on trip generation for the proposed hotel, which proved that the small increase in rooms would have a negligible impact on pedestrian comfort on the surrounding streets.
- 3.11. A Noise Technical Note was also submitted with the appeal, which explained that the increase of rooms would not require additional plant that would increase noise levels and that the additional activity would not cause noise levels to rise above ambient noise levels in the area.
- 3.12. The third reason for refusal is technical in nature and would be addressed by the signing of an Section 106 Agreement if the appeal were to be allowed.
- 3.13. For the avoidance of doubt, the additional evidence submitted as part of the appeal has been reviewed with reference to the 187-room scheme. The effects identified in each of these notes are either the same or reduced under the proposal for fewer rooms.

Proposed Minor Material Amendments to the Scheme

- 3.14. The Original Consent has been implemented, via operational development at street level, facing onto Adeline Place. Also, significant progress has been made internally, and the two basement levels have for many months been substantially completed.
- 3.15. Since implementation the Applicant has revisited the proposed design and uncovered the potential to deliver additional efficiencies in terms of the internal layout.
- 3.16. As a consequence, a minor material amendment is sought to increase the number of bedrooms from 166 to 187 rooms (these changes are described in full at Appendix 1). The application also provides an enhanced level of information and detail, such that, if approved, the planning permission would not be subject to conditions requiring discharge (a schedule of suggested re-wording of relevant conditions is provided at Appendix 2).

Procedural Matters

- 3.17. This application is submitted pursuant to s.73 of the Town and Country Planning Act 1990, which allows variations to be made to conditions attached to an existing planning consent. Since 2009⁵, Central Government has advised local authorities to utilise s.73 of the Act to facilitate amendments to planning permissions. The intention is to provide flexibility where amendments to planning permissions are sought.

⁵ Greater Flexibility for Planning Permissions: Guidance (November 2009), now replaced by the relevant part of the NPPG.

- 3.18. The term 'minor material amendment' is not defined in statute, however guidance indicates that this applies to proposals *"where its scale and/or nature results in a development which is not substantially different from the one which has been approved"*⁶.
- 3.19. The nature of the development would be unchanged – it would continue to be a hotel. The scale of the development would be unchanged in terms of the amount of floorspace. The increase in the number of rooms would be 13%.
- 3.20. When determining a s.73 application it is to be noted that the original development has already been judged acceptable in principle.
- 3.21. The scope of s.73 to make minor material amendments has been recently tested within the Courts, in the case of *Vue Entertainment Ltd v City of York Council [2017] EWHC 588*. In that case the situation revolved around an amendment to a cinema proposal from one of 12 screens and 2,000 person capacity, to one of 13 screens and 2,400 person capacity with an 80% floorspace increase (which is clearly a far more substantial amendment compared to what is being proposed at the Application Site). Collins J held that:

"It is to be noted that section 73 itself, as I have said, does not in terms limit the extent to which an amendment of conditions can be made. It does not have, on the face of it, to be within the adjective "minor", whatever that may mean in the context.

It is, I suppose, possible that there might be a case where a change of condition, albeit it did not seek to vary the permission itself on its face, was so different as to be what could properly be described as a fundamental variation of the effect of the permission overall. But it is not necessary for me to go into the possibility of that in the circumstances of this case because I am entirely satisfied that that does not apply in this particular case.

Now it must be obvious that it is necessary, if there is to be an amendment which is likely to affect a would-be objector, particularly where as, here, the claimants were objectors on the basis of the adverse effect on their operation of the proposal that there must be proper notification, consultation and ability to make representations. There was such, and representations were made...

It follows that there is no prejudice so far as the claimants are concerned, because they have been notified and they have been able to make representations. Those representations have been taken into account, as have those by the other cinema operators and thus the position so far as that is concerned is precisely the same as it would have been had there been a need for a fresh application.

It follows that in all the circumstances of this case there really is nothing to be gained from the quashing of this decision, even it were a decision which had any unlawfulness in it".

⁶ NPPG – Flexible options for planning permissions Paragraph 017

New Consent

- 3.22. Fundamentally the application seeks to amend Condition 2 ('Approved Plans & Documents') such that the consented drawing references are replaced with the proposed drawing references, and Condition 14 ('Number of Hotel Rooms'), such that it refers to 187 rooms instead of 166.

The Planning Application Package

- 3.23. In practice, some of these plans/documents replace those referred to in the Original Consent. In other instances, some plans/documents referred to in the Original Consent remain up to date without any need for replacement/updates. This is explained in Appendix 4.

4. Decision Making Framework

- 4.1. The following section sets out the decision making framework that is relevant to the determination of this application.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan

- 4.3. The development plan comprises:
- Adopted GLA London Plan (March 2021)
 - Adopted Camden Local Plan (July 2017)

Material Considerations

- 4.4. The NPPF (July 2021) and National Planning Practice Guidance (NPPG) are important material considerations in decision-making.
- 4.5. At the heart of the NPPF remains a presumption in favour of sustainable development (paragraph 11). The presumption, which is set out in the framework, states that where this test is met, applications should be approved without delay.
- 4.6. The GLA and LB Camden Council have published supplementary guidance, evidence bases and other documents which are relevant to the determination of this proposal. These will be identified at the relevant points within this Statement, along with any commentary on the appropriate weight to be attached.

5. Planning Assessment

- 5.1. In light of the development objectives of the project, and in the context of planning policy, the following paragraphs consider the key considerations associated with the proposed amendments.

Land Use Considerations

- 5.2. The proposed amendments to the ground floor and basement levels -4 & -5 do not change the use of or increase the floorspace. As such the proposals do not increase the scope of land use considerations. It is however necessary to consider the proposed increase in hotel rooms, in the context of the latent demand existing, as well as other planning benefits – set out below.

Benefits of Hotels

- 5.3. Hotels (and other types of visitor accommodation) are of fundamental importance to a location's economy. As well as creating direct, indirect and induced employment and economic activity, they enhance the viability of local business and leisure economics.
- 5.4. *"The total gross value added contribution to GDP from the hospitality industry is estimated to have been £143 billion in 2014. This is equivalent to 10% of UK GDP"⁷.*
- 5.5. By another measure *"the hospitality industry is estimated to have supported a total of 4.6 million jobs in 2014 either through its own activities, its supply chain or the induced expenditure of its employees and those in its supply chain. This equates to 14% of the total employment in the UK"⁸.*
- 5.6. Businesses, whether domestic or international operations will often have requirements for visitors to remain within their vicinity for more than a day, in which case, visitor accommodation will need to be provided. An absence (or lack of cost effective options) of this type of accommodation can have serious implications for a business's ability to function properly and grow, and can create a lack of desire to locate in that particular destination.
- 5.7. The viability of leisure destinations is reliant on the existence of visitor accommodation in all its guises. Leisure attractions are heavily reliant on visitor patronage. Many of these visitors will be international or reside domestically, but sufficiently far away to require short term sleeping accommodation. Again, without an adequate available and cost effective supply of visitor accommodation, a location's leisure economy can suffer and become eroded.

⁷ Page 22, Economic contribution of the UK hospitality industry (September 2015), Oxford Economics (on behalf of the British Hospitality Association).

⁸ Page 8, Economic contribution of the UK hospitality industry (September 2015), Oxford Economics (on behalf of the British Hospitality Association).

- 5.8. Indeed, this general presumption is recognised by the London Plan (2021) which explains 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”*⁹.

The Issues Facing London and Camden

- 5.9. London has one of the world’s most important business economies, and is the second most visited city globally for international tourism. International and domestic tourists created 31.5 million overnight visitors within the capital in 2015¹⁰.
- 5.10. *“Given the importance of tourism to London’s economy, London needs to ensure that it is able to meet the demands of tourists that want to visit the Capital, and a most important aspect of that is to provide suitable accommodation for those that wish to visit. However, currently the supply of serviced rooms is tight and the cost of accommodation expensive. In 2015 London had the highest occupancy rate of all European cities, and the fourth highest average daily rate, behind Zurich, Paris and Geneva”*¹¹. The average daily rate in 2015 was £194.40¹².
- 5.11. Consequently, the London Plan explains that *“it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum”*¹³. In other words, the London Plan seeks more than a 10% uplift in the annual target, compared to its adopted counterpart.
- 5.12. LB Camden contains the second highest number of serviced accommodation rooms amongst London Boroughs – 18,038 or 12.4% of London’s total¹⁴. Based on demand, it is estimated that Camden will need to provide 1,595 additional rooms to meet the growing demand by 2041. This equates to 2.7% of London’s total demand. Accounting for losses across the Borough, the number increases to 2,113¹⁵ serviced accommodation rooms.
- 5.13. It is therefore helpful that Camden’s Local Plan (July 2017) acknowledges the importance of hotels to the Boroughs’ continued role as a business and leisure hub. It explains that *“Camden has a wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town’s markets and Covent Garden; venues such as the Roundhouse, Koko and the Forum; Regent’s Canal; and historic places, such as Hampstead and Bloomsbury. These attract high numbers of visitors*

⁹ Policy E10, London Plan

¹⁰ Page 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹¹ Page 3, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹² Table 7, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹³ Paragraph 6.10.2, London Plan

¹⁴ Table 4, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

¹⁵ Table 14, Projections of demand and supply for visitor accommodation in London to 2050, GLA, April 2017.

throughout the year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole". As well as the importance of visitor accommodation to the local economy, the Local Plan states "Camden's visitor economy provides around 16,500 jobs in the borough, 10% of all tourism related employment in Inner London (Study of the Visitor Economy in Camden 2009) and is worth £566 million per annum".

- 5.14. A Hotel Demand Study produced by Avison Young was submitted as part of the appeal documents and is also enclosed with this application. The Study contains detailed research into the Central London hotel market and finds evidence of frustrated demand (demand outstripping supply) throughout the year.
- 5.15. A market occupancy model is also conducted within the study, which predicts that the proposed hotel would achieve a very strong occupancy performance at 88%. This compares favourable with the UK as a whole, which had an average hotel occupancy rate of 75.5% in 2019. Given the extremely high occupancy rate, the Study explains that there is scope for further economy hotels in the site's local market.
- 5.16. The proposed development would therefore convey additional economic benefits to the local area. The Study estimates that – relative to the 166-room scheme – the proposed 187-room hotel would provide 4.5 more FTE jobs and an additional £2.2m in additional tourism spend.

The Appropriateness of a Hotel at Great Russell Street

- 5.17. The site falls within the Central Activities Zone, lies on the edge of the Tottenham Court Road Growth Area, and alongside transport hubs, making the area well connected to central London and beyond. As a consequence of all the above, it is one of the most sustainable locations in London. Locating a hotel at this site therefore stands entirely to reason.
- 5.18. The principle of delivering a hotel in this location is supported by planning policy across all levels of government.

Central Government

- 5.19. By definition, hotels are 'main town centre uses'¹⁶ and as such, the NPPF requires "*applications for main town centre uses to be located in town centres*"¹⁷. As explained above, the site falls within the Central Activities Zone and lies within the edge of the Tottenham Court Road Growth Area.

¹⁶ Glossary, NPPF.

¹⁷ Paragraph 24, NPPF.

- 5.20. The NPPF also states the importance of identifying opportunities for business growth in particular areas¹⁸. Furthermore, the NPPF emphasises the effective use of land and make as much use as possible of previously developed or brownfield land¹⁹.

Regional Government

- 5.21. Policy E10 of the London Plan follows similar trends in promoting hotel use, stating that: *“London’s visitor economy and associated employment be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure”*. The policy also seeks to direct new visitor accommodation to ‘appropriate locations’ within the Central Activities Zone (CAZ).

Local Government

- 5.22. Policy E3 (Tourism) of Camden’s Local Plan 2017 states that *“It recognises the contribution that tourism makes to the character of Camden and the way that is perceived by those living outside the borough, and also the substantial number of jobs it provides.”*.
- 5.23. Further the Local Plan outlines the opportunities for Camden, which states: *“The Council will guide tourism development that is likely to attract large numbers of people to Camden’s part of Central London, particularly the growth areas of King’s Cross, Euston, Holborn and Tottenham Court Road”*. The site is located within close proximity of Tottenham Court Road Station.
- 5.24. Lastly, the Council expects the following outcomes from the Growth Area as stated in the Local Plan *“Growth here is being supported by the transport enhancements as part of Crossrail due to open in 2018, in addition to upgrades to the Northern Line and ticket hall area. These works will see a significant increase in the number of passengers using this area and improvement of the public realm is a high priority. The London Plan expects a minimum of 500 new homes and 5000 new jobs to be delivered in the growth area. Based on the identified opportunity sites in the Sites Allocations document, the Council expects around 60% of homes and more than half of the jobs to be provided in Camden’s part of the growth area...”*

Summary

- 5.25. The adequate provision of visitor accommodation in Camden is of fundamental importance to the economic success of its Central London Area, Greater London, and the UK as a whole.
- 5.26. The site lies within close proximity to Tottenham Court Road Station, has PTAL 6b, and is hence is an appropriate location for a hotel in Camden.

¹⁸ Paragraph 80, NPPF

¹⁹ Paragraph 117, NPPF

5.27. In conclusion, it is considered that increasing the number of rooms in this location would be wholly compliant with national, regional and local policy and would provide an excellent facility within a highly accessible location.

6. Other Planning Considerations

Design

External Changes

- 6.1. The proposal would result in minor alterations to the elevations of the buildings – comprising the entrance doorway onto Great Russell Street, and the majority of the ground floor onto Adeline Place. Alterations would occur as a result of the different internal layout versus the approved original one.
- 6.2. Permission was previously granted for a gate entrance and a steel door set with vision panel to the bike store and ventilation louvre panels and doors to the substation (Adeline Place). The proposal in this application retains the material and colours of the approved one but include only the use of ventilation louvre for all the accesses, gates doors and panels.
- 6.3. Lastly, it is sought to locate a louvre penthouse for the new air handling unit exhaust on the roof of the first floor. The colour will be matching that of the existing roof.

Sub-terranean Hotel

- 6.4. The original application consented 166 rooms below the ground floor level. The additional 21 rooms is not considered to raise any amenity issues to the hotel guests. The Planning Inspector in his appeal letter found that guests have the option to choose a variety of different accommodation options across London: *“Some of those who made written and/or oral representations were of the opinion that underground hotel rooms without windows are in principle an unsuitable way of accommodating visitors. Whilst that is a legitimate point of view, it does not find support in planning policy or guidance. Visitors to London have a wide choice of hotel accommodation. Perhaps some would choose not to sleep in an underground room. However, others may well decide that the benefits of a highly accessible location, close to numerous visitor attractions, would outweigh the absence of a window. I can see no land use planning reason why that choice should be precluded”*²⁰.

Internal Alterations

- 6.5. The revised plans would utilise the -4 & -5 basement levels in a more efficient manner to allow the total number of rooms to increase from 166 to 187.

²⁰ Appendix 3

Size & Layout

- 6.6. The London Plan does not provide any guidance on minimum space standards for hotel accommodation.

Transport

- 6.7. This application is supported by a revised Transport Assessment which confirms that the access arrangements approved under the Original consent remain acceptable for the proposed amended plans. Furthermore, the amendments will not lead to any significant highways effects over and above those identified in the transport assessment submitted with the Original Application, therefore no further mitigation measures are required to make the proposed development acceptable.

Cycle

- 6.8. The proposed amendments include an increase to the amount of cycle parking to serve the needs of the increase in number of hotel rooms. Please refer to the accompanying transport statement for explanation and justification of the proposed changes.
- 6.9. This is in line with the London Plan's bicycle parking standards which require 1 space per 20 bedrooms for long stay parking and 1 space per 50 bedrooms for short stay parking (i.e. 19 spaces).
- 6.10. Furthermore, the site's excellent public transport links and proximity to Cycle Hire stations will place less demand on cycle parking provision and provides further sustainable transport options.
- 6.11. The Applicant has made a £200,000 S106 'Cycle Hire Docking Station Contribution' and currently there is ongoing discussion with the Council and TfL around the new docking station being provided adjacent to the site. There is also the £133,500 S106 'Pedestrian, Cycling and Environmental Contribution', which has been made, for the purpose of improving the public realm for cycling in the vicinity of the site.

Deliveries and Servicing

- 6.12. An updated Delivery and Servicing Management Plan is submitted with the application to account for the proposed scheme amendments. This follows the principles established under the Original Consent, and subsequent discharge of the relevant S106 obligation, which has been judged to be acceptable.

Pedestrian Comfort

- 6.13. The Transport Note produced in support of the live appeal provides details of the proposed development's impact on pedestrian comfort. An assessment is conducted using Transport for London's methodology for calculating a grade for pedestrian comfort level. Accounting for the proposed development Great Russell Street scores an A- grade, which indicates that the footway would be comfortable in all areas.

- 6.14. Other roads (such as Adeline Place) that bound the site would score at least as highly, as the main entrance to the hotel is on Great Russell Street. Adeline Place also does not provide a walking desire line to a particular destination that is likely to attract a significant number of pedestrian trips and its footway is as wide as the footway on Great Russell Street.
- 6.15. The Transport Note concludes that a high level of pedestrian comfort would be maintained under the proposed development. Therefore, the impact on local amenity would be negligible.

Accessibility

- 6.16. The enclosed Accessibility Note explains that the proposed development is compliant with the relevant accessibility policies in the Local Plan.
- 6.17. The Accessibility Technical Note drew on the findings of the Lift Traffic Analysis Report and the Lift Maintenance Agreement which are both submitted with the application. The Lift Traffic Analysis Report used the peak one-way trip demand calculated in the enclosed Transport Technical Note. Table 4 of the Transport Technical Note found that a peak of 82 one-way trips are projected for the proposed development.
- 6.18. The Lift Traffic Analysis Report finds that – even in a worst case scenario where all 82 guests arrived separately and use the lift one-by-one – the lift would have the capacity to accommodate this demand in less than an hour. Under a more realistic assumption that three guests would use the lift together, the peak hourly demand could be accommodated in less than 20 minutes.
- 6.19. Based on this information, the Accessibility Technical Note concludes that the provision of a single lift would be sufficient to satisfy the access requirements of the hotel.
- 6.20. The Lift Maintenance Agreement confirms that the Applicant has made suitable provision in the event that the lift requires repairs. A response time of 2 hours has been agreed for general repairs and 1 hour to respond when an entrapment rescue is required.
- 6.21. The range of documents submitted demonstrate that a range of considerations have been accounted for to ensure that the provision of a single lift will meet the operational requirements of the proposed hotel.

Fire Safety

- 6.22. The Fire Statement outlines that compliance with all aspects of Policy D12 is achieved through *inter alia* fire-resistant materials, water mist suppression and a suitable detection and alarm system.
- 6.23. Policy D5 relates to accessibility more generally but the B5 component of this policy states that:

“In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.”²¹

- 6.24. The policy is somewhat ambiguous on what constitutes a ‘core’, but the draft Fire Safety London Plan Guidance offers more clarity. The draft Guidance contains template forms intended to be used to demonstrate compliance with Policies D5 and D12. Forms 1 and 2 include the requirements to comply with Policy D5(B5):

“Where a lift core is provided, at least one lift is an evacuation lift”²²

- 6.25. It is clear from the wording of the draft Guidance that ‘cores’ referred to in Policy D5(B5) are specifically ‘lift cores’. The proposed development contains one lift core, which includes an evacuation lift. Therefore, it is compliant with the requirements of London Plan Policy D5(B5).
- 6.26. In the event of a fire, a simultaneous evacuation strategy using the stairs is proposed for those not requiring level access. For wheelchair users, a refuge space strategy is proposed using dedicated areas next to the escape stairs.
- 6.27. This strategy was considered to be acceptable by officers in the Committee Report for the previous application, who acknowledged that this is a suitable alternative strategy given that additional lifts cannot be provided.

Flood Risk

- 6.28. The application site falls within Flood Zone 1 and is at low risk of flooding. An updated Flood Risk Assessment has been prepared to account the increase in the number of hotel rooms.

Sustainability

- 6.29. An addendum to the Energy Statement, which formed part of the Sustainability Strategy submitted as part of the Original Application, has been submitted with this application. The Statement updates the existing approved strategy to account for the additional 21 rooms within the development, with reference to the 2021 Part L of Building Regulations.
- 6.30. The savings and proposed efficiency measures outlined within the report result in dwellings across the scheme achieving a reduction in regulated emissions of 45.5% against the 2021 Part L Building

²¹ London Plan (2021), p. 122

²² Draft Fire Safety London Plan Guidance (2022), p. 29 and 30

Regulations. Therefore, this fully satisfies the applicable planning policies relating to energy conservation, distributed energy networks and renewable energy.

Air Quality

- 6.31. The updated Air Quality Assessment confirms that the air quality at basement levels -4 & -5 would remain acceptable under the proposed amended plans.
- 6.32. Further, an air quality neutral assessment has been undertaken in line with Policy SI 1 of the London Plan. It was determined that the proposed development will be '*Air Quality Neutral*', as there are no building emissions and negligible transport emissions associated with the proposed development.

Noise

- 6.33. An updated Noise Assessment, confirms the revised proposals will not cause any additional effects or disturbance to the existing local residents or occupants of the proposed hotel, compared to the Original Application scheme.
- 6.34. Noise attenuation information accompanying the application also confirms that the requirement set out in Condition 9 for plant noise to be 15dB or more below background levels would be possible to achieve.

Local Community Engagement

- 6.35. Prior to submission of the previous application the Applicant has engaged in consultation with local residents and interested parties, to present the draft proposals and provide the opportunity to engage in the design developments.
- 6.36. One consultation response was received, from the Bloomsbury Association. Consideration has been given to these comments received and the proposals have been revised accordingly, where appropriate.
- 6.37. On the basis that the scheme design has not significantly changed since this application, it would not be appropriate to engage further for this application.

7. Conclusion

- 7.1. This Planning Statement has been prepared by Centro Planning Consultancy on behalf of Central London Investments Limited (“the Applicant”), the landowner, in support of minor material amendment application at 112A Great Russell Street, London, WC1B 3NP, to LB Camden Council. In essence, the proposed amendment is for a 187 room hotel, compared to the consented 166 room hotel.
- 7.2. Recent case law (*Vue Entertainment Ltd v City of York Council [2017] EWHC 588*) confirms that the MMA procedure is appropriate and lawful in this instance.
- 7.3. The Site is an appropriate location for hotel use given its location within the Central Activities Zone and proximity to the boundary of Tottenham Court Growth Area and Tottenham Court Underground Station.
- 7.4. This Statement has demonstrated that the proposed development complies with the overall objectives of national, regional and local policy guidance, and in so doing, would deliver a sustainable development of the site that would contribute to the supply of visitor accommodation in the Central Activities Zone – a significant planning benefit.
- 7.5. This benefit would be realised without any increase to the volume of the building nor the basement approved under the Original Consent. Furthermore, no major external changes are proposed compared to the Original scheme. Other planning effects arising (highways, environmental, and technical etc) would be only marginally different, and far outweighed by the benefit of the additional rooms.
- 7.6. Evidence provided as part of this planning application demonstrates that the reasons for refusal put forward as part of the First Minor Material Amendment Application are now resolved.
- 7.7. Overall, the proposal is in full accordance with the development plan, and no material considerations indicate otherwise. Consequently, the application should be approved without delay.

Appendix 1 – Physical Changes

Ground Floor

- For the hotel lobby, minor internal revisions are proposed. The revisions will allow a better internal layout of the lobby and will rationalise the number of lifts within the lobby and Core 1 of levels -4 & -5.
- Internal and external alterations to the Adeline Place entrance.
- The proposed substation is to be installed within 'basement ramp -4' (as opposed to 'basement ramp -5'), as required by UK Power Networks.
- The reallocation of the substation will have the effect of switching the function of the two existing ramps. Under the consented plans 'basement ramp -4' was used for servicing the hotel. The reallocation of the substation will cause 'basement ramp -4' to become obsolete. Consequently 'basement ramp -5' will become the new servicing route for the hotel.
- Removing both of the existing vehicle crossovers remains part of the proposal.
- Reduction of proposed on-site cycle parking spaces from 32 to 19. The revised number (19) would comply with adopted the London Plan requirements and Camden's Transport Guidance document (2019), which seeks an additional 20% of spaces over and above the London Plan.

Levels -4 & -5

- Internal reconfiguration of the layout to increase the number of rooms from 166 to 187.
- Hotel Lobby to be relocated.
- Reception area removed from level -5.
- Additionally, it is sought to introduce minor revisions in all three Cores (1, 2 & 3) of both levels (-5 & -4). The aim is to improve the layout of the cores and to reflect the changes aforementioned in the paragraphs above. Furthermore, the proposals rationalise the number of lifts within Cores 1 & 3.

Elevations

- The proposal would result in minor alterations to the elevations of the building – comprising the entrance doorway onto Great Russell Street, and the majority of the ground floor onto Adeline Place. Alterations would occur as a result of the different internal layout versus that approved.

Appendix 2 – Condition Changes

Condition 1

Now obsolete on the basis that the original consent is implemented.

Condition 2

Original Condition

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

2897/L/01, 2897/P/01B, 2897/P/02B, 2897/P/03B, 2897/P/04B, 2897/P/05B, 2897/P/06A, 2897/P/07, 2897/P/08A, 2897/P/11F, 2897/P/12C, 2897/P/13C, 2897/P/14D, 2897/P/15G, 2897/P/16G, 2897/P/17D, 2897/P/18C, 2897/P/19B, 2897/P/31, 2897/P/32, DMWR/A3/3233/PL-00300revP1.

Revised Condition

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

GRS-1101 C10; GRS-1102 C10; GRS-1103 P5; GRS-1104 C3; GRS-1105 C2; GRS-1152 C1; GRS-1153 C1; GRS-1154 C1; GRS-0170 P2; GRS-0171 P3; Drainage Drawings (x5 dated 21-July-2020); W602-MYC-00-00-DRME-5921; W602-MYC-00-00-DR-ME-5924-Rev R3. Air Quality Assessment by Hawkins Environmental dated 22 November 2022; Covering Letter by Centro Planning Consultancy dated 12 December 2022; Drainage Strategy by MY Construction dated 28 November 2022; Energy Strategy Report by Syntegra dated December 2022; Hotel Management Plan by Criterion Capital, dated November 2022; Mechanical Drawings, by MY Construction dated 26 June 2020; Noise Assessment by Hawkins Environmental dated 24 November 2020; Planning and Design Statement by Centro Planning Consultancy dated December 2022; Servicing Management Plan by Criterion Capital dated November 2022; Transport Assessment by TPP dated November 2022; Travel Plan by TPP dated November 2022; Drainage Technical Note by MY Construction dated 14 August 2020; Accessibility Technical Note, by David Bonnett Associates dated August 2022; Fire Statement by Marshall Fire dated 6 December 2022; Hotel Demand Study by Avison Young dated 1 June 2022; Lift Maintenance Agreement by KONE (no date); Lift Traffic Analysis Report by The Lift Consultancy dated 12 December 2022; Noise Technical Note by Hawkins Environmental dated 21 November 2022; Transport Note by TPP dated November 2022.

Condition 3

Original Condition

3. Prior to first occupation of the development, an Air Quality Report shall be submitted to and approved in writing by the local planning authority. The report shall provide evidence that an appropriate NO2 scrubbing system on the mechanical ventilation intake has been installed. The system shall be generally in accordance with the recommendations of the submitted Air Quality Assessment by Hoare Lea dated 22 May 2015. The report shall include a detailed maintenance plan for the system. The scrubbing system shall thereafter be operated and maintained in accordance with the approved report for the lifetime of the development.

Revised Condition

3. Prior to first occupation of the development, an Air Quality Report shall be submitted to and approved in writing by the local planning authority. The report shall provide evidence that an appropriate NO2 scrubbing system on the mechanical ventilation intake has been installed. The system shall be generally in accordance with the recommendations of the submitted Air Quality Assessment by Hawkins Environmental, dated 1 May 2020. The report shall include a detailed maintenance plan for the system. The scrubbing system shall thereafter be operated and maintained in accordance with the approved report for the lifetime of the development.

Condition 6

Original Condition

6. Before the development commences, details for the provision of a minimum of 8 covered, secure and fully enclosed cycle storage/parking spaces for staff and 24 cycle parking spaces for visitors shall be submitted to and approved in writing by the local planning authority. The cycle parking facilities should be designed to Camden Council's design specifications as detailed in CPG7. The cycle parking facilities shall be provided as approved prior to the occupation of the development and shall thereafter be permanently retained as such.

Revised Condition (to be removed)

6. Nineteen secure and covered cycle parking spaces will be provided within the development for staff and visitors of the hotel, accessible from Adeline Place. This level of provision is in excess of the draft New London Plan standards which requires a minimum of 1 space per 20 bedrooms for staff and 1 space per 50 bedrooms for visitors. This provision also adheres to Camden's Transport Planning Guidance. This detail is contained on the Architects drawings, compliance with which can be controlled via condition 2.

Condition 9

Original Condition

9. Prior to the commencement of the authorised use, a written acoustic report detailing measures to control noise from fixed plant and equipment shall be submitted to and approved in writing by the local planning authority. The noise level from any plant and equipment, together with any associated ducting

or vents, shall be 15 dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise sensitive premises. The method of assessment is to be in accordance with BS4142:2014. The plant and equipment shall be installed and constructed in accordance with the approved scheme and shall be permanently maintained as such thereafter. Prior to the plant being used a validation test shall be carried out following completion of the development. The use hereby permitted shall not commence until a report of the validation test has been submitted to and approved in writing by the local planning authority.

Revised Condition

9. Prior to the plant being used a validation test shall be carried out following completion of the development. The use hereby permitted shall not commence until a report of the validation test has been submitted to and approved in writing by the local planning authority.

Condition 10

Original Condition

10. Development shall not commence until a drainage strategy has been submitted to and approved in writing by the local planning authority. The strategy should be prepared in consultation with the sewerage undertaker and should demonstrate that the existing and proposed foul and surface water connection points and peak flow rates will have an acceptable impact on the public sewer system. The drainage strategy shall be implemented as approved before the first occupation of the development hereby permitted.

Revised Condition (to be removed)

10. Revised drainage report produced by MY Construction addresses all the points required in the original condition, and its compliance can be secured via condition 2.

Condition 12

Original Condition

12. Prior to the installation of any electrical plant or equipment in basement levels -4 or -5, details of the installation shall be submitted to and approved in writing by the local planning authority. The details should be prepared in consultation with Transport for London to ensure that the plant or equipment does not harm the operation of the transport system. Any plant equipment installed shall thereafter be operated and maintained in accordance with the approved details.

Revised Condition (to be removed)

12. The detailed electrical plant information produced by MY Construction addresses all the points required in the original condition, and its compliance can be secured via condition 2.

Condition 14

Original Condition

14. The development hereby permitted shall not comprise more than 166 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.

Revised Condition

14. The development hereby permitted shall not comprise more than 187 hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission.

Appendix 3 – Appeal Decision Letter

Appendix 4 – Schedule of Updated Information

Document/Plan Title	Comment
Application Form & Certificate	New application form submitted
CIL Form	New CIL form submitted
Planning Statement	Revised statement submitted which should be read in conjunction with the Planning Statement relating to the Original Consent
Drawings	Revised drawings submitted
Noise Assessment	Revised version submitted, updated in November 2022
Air Quality Assessment	Revised version submitted, updated in November 2022
Service Management Plan	Revised version submitted
Hotel Management Plan	Revised version submitted
Drainage Strategy	Revised version submitted
Transport Assessment & Travel Plan	Revised version submitted, updated in November 2022
Energy/Sustainability Statement	Revised version submitted
Fire Statement	Revised version submitted
Employment Training Plan	No need for revisions

