

<b>Address:</b>	Travelodge Hotel 10 Drury Lane London WC2B 5RE		<b>1</b>
<b>Application Number(s):</b>	2024/0436/P	<b>Officer:</b> Christopher Smith	
<b>Ward:</b>	Holborn and Covent Garden		
<b>Date Received:</b>	05/02/2024		
<b>Proposal:</b>	Erection of a two storey extension forming a new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of under croft at level 3 and new flat roof link to extend existing hotel bar/restaurant; and other ancillary works.		
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>			
Existing Drawings: Site Location Plan; J9348/10 to 13 (all Rev. A), J9348/15 Rev. A, J9348/16.			
Proposed Drawings: J9348/20 Rev. H, 21 Rev. G, 22 Rev. F, 23 Rev. H, 25 Rev. M, 27 Rev. B, 32 Rev. C, 33 Rev. E, 34 Rev. E, 35 Rev. D, 43 Rev. D; IG22/185/201 Rev. P5.			
Documents: Air Quality Assessment dated February 2024, Level 1 FRA & Drainage Strategy Report dated February 2024, Environmental Sound Level Survey and Plant Noise Assessment dated March 2024, Design & Access Statement dated February 2024, Transport Statement & Travel Plan dated February 2024, Construction Phase SHEQ Management Plan dated January 2024, Covering letter dated February 2024, Security Needs Assessment dated February 2024, Planning Statement dated February 2024, Fire Strategy Report dated February 2024, Daylight & Sunlight Report dated February 2024, Heritage Statement dated February 2024, Energy Statement dated September 2024, Sustainability Statement dated September 2024, Urban Greening Factor calculation sheet (undated).			
<b>RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement</b>			
<b>Applicant:</b>	<b>Agent:</b>		
Travelodge Hotels Ltd and Falkerstone Ltd c/o Agent	Nick Jenkins Smith Jenkins Ltd 7 Canon Hamett Court Wolverton Mill Milton Keynes MK12 5NF		

## ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
C1	Hotel	16,175	17,192	+ 1,017
<b>Total</b>	<b>All uses</b>	16,175	17,192	+ 1,017

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	22	0	- 22
Car - Disabled accessible	2	2	+/- 0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long and short stay	28	34	+6

## EXECUTIVE SUMMARY

- i) The proposed development is for a two-storey extension to create a step-free entrance to the hotel off Drury Road. It also includes the infilling of the rear undercroft to extend the existing hotel bar/restaurant and the infilling of the existing car park below the existing podium level to form 55 new hotel bedrooms, with a total of 1,017sqm of new hotel floor space provided.
- ii) The development would support the economic, social and cultural role of Central London, including Central Activity Zone functions, and would bring growth in jobs and economic activity to this part of Camden. It would help to meet the anticipated future growth in demand for visitor accommodation in London as identified by the Camden Local Plan and the London Plan. The existing business would remain suitable for a town centre location.
- iii) Policy H2 requires that in the Central London Area (CLA), development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing. However, the highly unusual design and layout of the existing building on the site creates significant practical limitations to providing housing on this site. Noting this and the lack of other suitable sites locally

the Council has instead secured the policy compliant payment in lieu of £762,750 towards housing in the Borough.

- iv) The detailed design of the two storey extension on Drury Lane would be of a high quality and has been developed through detailed discussions with officers in order to ensure it would not impact negatively on the character and appearance of the existing hotel or the local area, whilst also providing significant level access improvements for users of the hotel. There would be no harm to local heritage assets as the result of the proposal.
- v) The amenity of local residents and businesses would not be adversely affected by the proposal as the development has been sensitively designed to manage potential noise and other operational impacts, and there would no negative impacts from a loss of daylight or sunlight, loss of outlook or privacy, or increased light spill.
- vi) The development would infill existing areas on the site and would not lead to extensive demolition. It would also meet the required carbon reduction targets and would remove most existing car parking spaces from the site which means the development would be air quality neutral.
- vii) The development would be car free other than for two wheelchair accessible parking spaces. Cycle parking provision at the site would increase.
- viii) The scheme complies with the development plan as a whole and as such it is recommended that the application is granted subject to a Section 106 legal agreement.

## OFFICER REPORT

**Reason for Referral to Committee: Major development involving the provision of more than 1,000 sqm of non-residential floorspace (Clause 3(i)); and subject to the completion of a legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).**

### 1. SITE AND BACKGROUND

#### ***Designations***

- 1.1 The following are the most relevant designations or constraints:

<b>Designation</b>	<b>Details</b>
Central London Area	n/a
Local Centre	Seven Dials
Secondary Commercial Frontage	Covent Garden
Archaeological Priority Area	London Suburbs
Conservation Area (adjacent to)	Seven Dials (Covent Garden)
PTAL (Public transport accessibility)	3-4
Underground development constraints and considerations	- Subterranean (groundwater) flow - Slope stability

*Table 1 - Site designations and constraints*

#### ***Description***

- 1.2 The site is an existing Travelodge Hotel located on the western side of Drury Lane to the north of the junction with Shorts Gardens. It has a unique brutalist-style design of between two and 12 storeys in height, with the hotel activities spread irregularly over many levels, including within the adjacent ten storey building at 180 High Holborn which is not part of the application site (though is within the applicant's ownership).
- 1.3 The hotel shares its site with three single storey commercial units that front directly onto Drury Lane, and another commercial unit that fronts onto Shorts Gardens.
- 1.4 The hotel is primarily accessed from two open stairways; one to the north of the row of commercial units onto Drury Lane and another at the corner of Drury Lane and Shorts Gardens. At the top of these sets of stairs is the main reception – a single storey lightweight frame structure that sits on top of a concrete podium. Behind (to the west of) the reception at podium level is an undercroft area that is currently used for storage. The remaining parts of the

building above podium level are set out in an S-shape and over varying heights, with a part-five part-nine storey elevation onto Shorts Gardens and a twelve storey angled elevation onto Drury Lane. As can be seen in Figure 2 below the height of the various elements of the building varies considerably across the site.

- 1.5 The site is serviced from the gated vehicle access points on Shorts Gardens and High Holborn. Service and storage areas are currently located below the podium and to the rear of the building to the north and west.
- 1.6 The site covers an area of 0.24 hectares in total.
- 1.7 The surrounding area is predominantly commercial in character with a range of businesses visible on Drury Lane, Shorts Gardens and High Holborn. The Dudley Court sheltered housing estate is located to the rear (west) of the site, separated from the application site by the service access road.

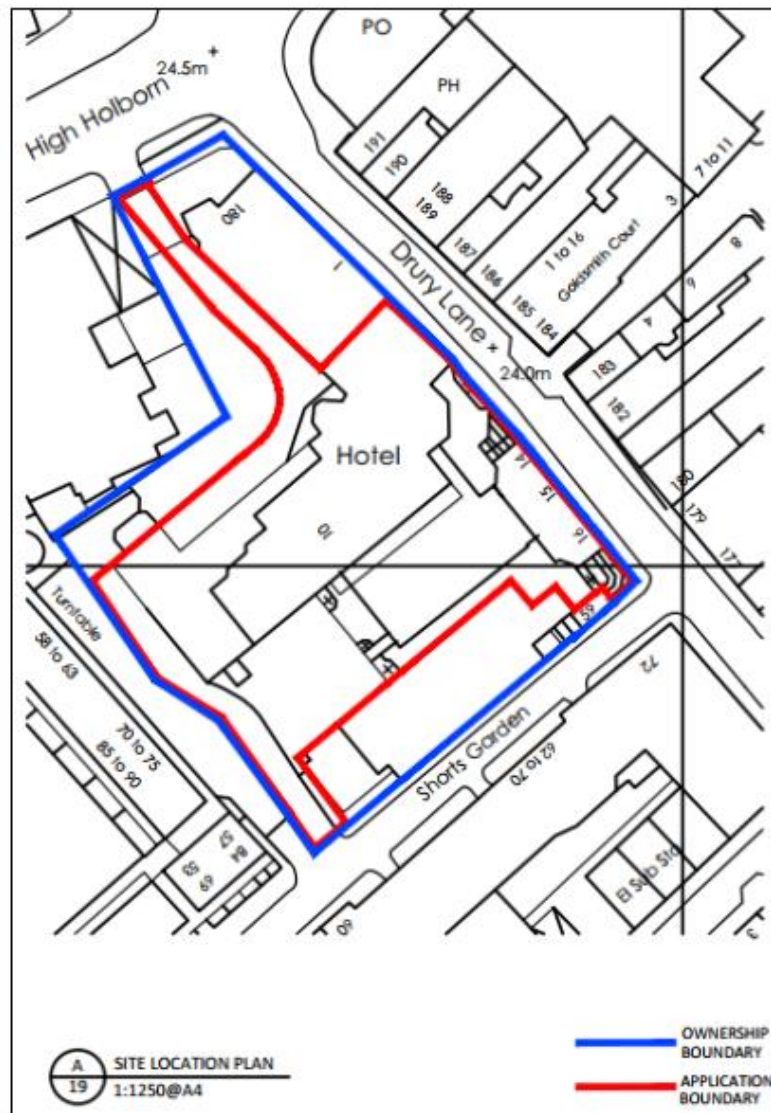
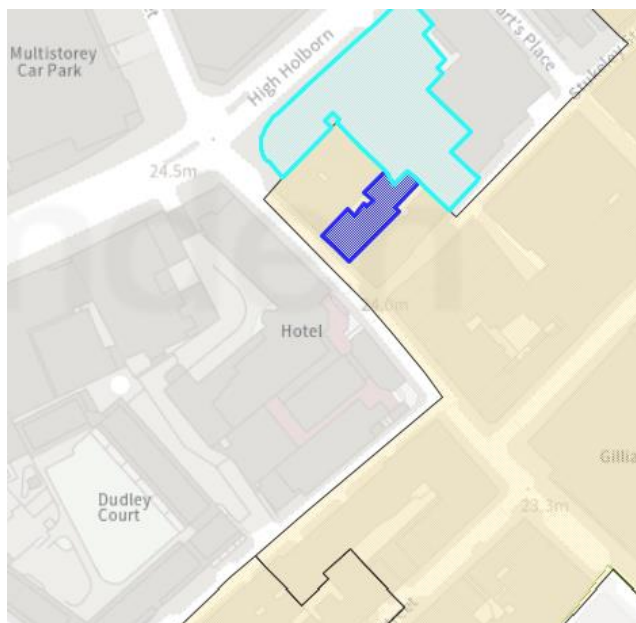


Figure 1 – Existing site location plan



Figure 2 – Aerial image of existing hotel

- 1.8 The site is not listed or located within a Conservation Area. The Seven Dials Conservation Area is adjacent to the site on its eastern and southern sides. Nos. 186 and 187 Drury Lane opposite the site are Grade II listed. Opposite the site no. 181 High Holborn is locally listed.



Key	
Yellow	– Conservation Area
Dark Blue	– Listed Building
Light Blue	– Locally Listed Building

Figure 3 – Map of local heritage designations

- 1.9 The site has a Public Transport Accessibility Level (PTAL) rating of 6B (highest) as it is close to Holborn and Covent Garden London Underground Stations, as well as many local bus services.

## **2. THE PROPOSAL**

- 2.1 The proposal is for the erection of a two storey entrance to the hotel by infilling the existing northernmost stepped entrance onto Drury Lane, the extension of the existing hotel bar/restaurant by infilling the rear undercroft, and the provision of 55 new hotel bedrooms by infilling the existing car park and service area located below the existing podium level.
- 2.2 These works would create a total of 1,017sqm of new hotel floor space.
- 2.3 Other ancillary works are also proposed, including the installation of a handrail and access control gate to the existing ramped access.

## **3. RELEVANT HISTORY**

### ***The site***

- 3.1 There have been a wide range of applications submitted on this site since this building was completed in 1964.
- 3.2 Since then, most other extensions have related to the piecemeal alteration and extension of the building, telecommunications equipment installations or advertisement consent applications for signage.
- 3.3 Applications that do not fall into the categories referenced above that have been submitted since 2015 are referenced below:
- 3.4 2015/5430/P. Infilling of colonnade at ground and first floor level to provide 6 additional hotel rooms and separate ground floor retail unit (Use Class A1). Granted subject to legal agreement 11<sup>th</sup> March 2016.
- 3.5 2017/6234/P. Temporary change of use of ground floor unit from retail (Class A1) to marketing suite (sui generis) for 3 years to include installation of external condenser unit and associated louvres; alterations to existing façades and associated works. Granted 29<sup>th</sup> January 2018.
- 3.6 2019/2643/P. Variation of condition 6 (use of flat roofs as amenity terraces and commercial drinking/eating areas) of planning permission dated 07/10/09 ref: 2009/2628/P (for change of use from office to hotel with erection of single storey glazed extension to Drury Lane elevation; replacement of glazed wall with rendered wall and new fire exit to High Holborn elevation), namely to allow outdoor seating associated with the hotel on the raised terrace adjoining its front entrance on Drury Lane. Granted subject to legal agreement 6<sup>th</sup> January 2021.

### ***Other relevant applications***

- 3.7 2023/3870/P & 2023/3901/L. Change of use of part of basement car park and one ground floor retail unit to hotel with ancillary food and beverage

use, including alterations to upper basement floor slab, installation of plant, acoustic enclosures and PV panels at roof level, and associated works.

- Planning permission and listed building consent are to be granted subject to completion of a S106 agreement for the infilling of an underground car park to provide windowless hotel rooms at the Brunswick Centre, following a resolution in favour of this being given by Planning Committee on 21<sup>st</sup> March 2024.

3.8 2015/3605/P. 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. Refused 4<sup>th</sup> February 2016. Appeal Allowed 4<sup>th</sup> November 2016.

- This is a recent appeal decision that allowed redevelopment of an underground car park for windowless hotel rooms in the sub-basement levels below the St. Giles Hotel in Bloomsbury.

#### 4. CONSULTATION

##### ***Statutory consultees***

##### Thames Water

4.1 No objections.

##### TfL – Spatial Planning

4.2 No objections, subject to further details of cycle parking and robust travel plan measures.

##### TfL – Crossrail 2

4.3 No comments to make.

##### Historic England – Greater London Archaeological Advisory Service (GLAAS)

4.4 No objections.

##### Metropolitan Police – Designing Out Crime Officer

4.5 No objections, subject to further consideration of their recommendations.

##### London Fire Brigade

4.6 Observations and recommendations provided with regard to the detailed fire safety design. Points raised in respect of the design of evacuation lifts, fire curtains, green roofs, and electric scooters, bikes and vehicles and their related equipment. No objections have been raised.



Camden Environmental Health – Contaminated Land

- 4.7 No objections, subject to a condition in the event of unexpected contamination being encountered.

Camden Environmental Health – Pollution Planning Officer

- 4.8 No objections, subject to conditions regarding noise management in respect of noise limitations and management of vibration.

Camden Transport Officer

- 4.9 No objections, subject to conditions and planning obligations secured through legal agreement.

Camden Design Officer

- 4.10 No objections. Development design has been amended in accordance with comments and guidance provided.

Camden Conservation Officer

- 4.11 No objections.

Camden Lead London Flood Authority

- 4.12 No objections, subject to conditions.

Camden Air Quality and Energy/Sustainability Response

- 4.13 No objections, subject to conditions. Further improvements to provision of solar PV panels should be sought. Overall BREEAM score is very good, which is supported. It is understood that the proposal cannot meet 'excellent' due to the nature of the proposed extension, constraints of the existing building, site location and constraints of the applicable BREEAM scheme. This is acceptable subject to the applicant demonstrating they have taken all reasonable steps to ensure the potential credits score is maximised.

Camden Inclusive Economy

- 4.14 No objections, subject to securing employment measures through legal agreement.

***Local groups***

Seven Dials CAAC

- 4.15 No comments received.

Seven Dials Trust

- 4.16 No comments received.

***Adjoining occupiers***

- 4.17 Two sites notice were displayed, one on Drury Lane and another on Shorts Gardens. The notices were displayed on 15<sup>th</sup> March 2024 until 8<sup>th</sup> April 2024

and the application was advertised in the local paper on 14<sup>th</sup> March 2024 (expiring 7<sup>th</sup> April 2024).

4.18 Objections were received from one local household. The objections received are described in full on the Council's website. The key issues raised are.

- Increase in vehicle traffic congestion.
- Overcrowding of pedestrian environment.
- Inappropriate location for the main hotel entrance.

*Officer response: The development is expected to reduce vehicle traffic to the site due to its significant reduction in car parking availability on site. The proposal has been designed to accommodate further circulation and reception space internally which would help to prevent hotel patrons waiting on street. Further response to the development siting and design is provided in Section 10 (Design and Heritage) below.*

## 5. POLICY

### ***National and regional policy and guidance***

[National Planning Policy Framework 2023 \(NPPF\)](#)

[Draft National Planning Policy Framework 2024 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

### ***Local policy and guidance***

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy H1 Maximising housing supply](#)

[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)  
[Policy CC5 Waste](#)  
[Policy TC2 Camden's centres and other shopping areas](#)  
[Policy TC4 Town centre uses](#)  
[Policy T1 Prioritising walking, cycling and public transport](#)  
[Policy T2 Parking and car-free development](#)  
[Policy T4 Sustainable movement of goods and materials](#)  
[Policy DM1 Delivery and monitoring](#)

### Supplementary Planning Documents and Guidance

*Most relevant Camden Planning Guidance (CPGs):*

[Access for All - March 2019](#)  
[Air Quality - January 2021](#)  
[Amenity - January 2021](#)  
[Basements - January 2021](#)  
[Biodiversity - March 2018](#)  
[Design - January 2021](#)  
[Developer Contribution - March 2019](#)  
[Employment sites and business premises - January 2021](#)  
[Energy efficiency and adaptation - January 2021](#)  
[Housing - January 2021](#)  
[Town centres and retail - January 2021](#)  
[Transport - January 2021](#)  
[Water and flooding - March 2019](#)

### Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The consultation closed on 13 March 2024. The DCLP is a material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

## **6. ASSESSMENT**

6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

<b>7</b>	<b>Land use</b>
<b>8</b>	<b>Quality of Hotel Accommodation</b>
<b>9</b>	<b>Impact on Neighbouring Amenity</b>
<b>10</b>	<b>Design and Heritage</b>
<b>11</b>	<b>Sustainability and Energy</b>
<b>12</b>	<b>Flood Risk and Drainage</b>

13	<b>Ecology and Biodiversity</b>
14	<b>Air Quality</b>
15	<b>Transport</b>
16	<b>Land Contamination</b>
17	<b>Fire Safety</b>
18	<b>Employment and Training Opportunities</b>
12	<b>Community Infrastructure Levy (CIL)</b>

## 7. LAND USE

### *Proposed hotel uses*

- 7.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.
- 7.2 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site. The Council anticipates Central London playing a key role in facilitating that growth. The supporting text to Policy G1 states that the Council shall promote and encourage high-quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough, whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other relevant planning objectives.
- 7.3 Policy E1 of the Local Plan states that the Council will support businesses of all size, and the supporting text to E1 identifies that jobs in the borough are provided by many types of uses, including hotels. Policy E3 of the Local Plan states that the Council recognises the importance of the visitor economy in Camden and therefore supports tourism development and visitor accommodation proposals in principle, particularly where this is located in Central London. Policy SD6 of the London Plan also supports hotel development in town centre locations.
- 7.4 The site is located within a Central London area with the highest possible transport accessibility (PTAL of 6b). The proposed development would utilise the site more effectively through increasing the density of the activities on it.
- 7.5 The proposal would result in the expansion of the existing hotel use (Class C1) at the site in the form of 1,017sqm of new floor space. This would be mostly provided below the existing podium level within a servicing and car

parking area for the hotel that is currently underutilised. The merits of the 'windowless' typology of hotel accommodation will be discussed in the 'quality of hotel accommodation' section below.

- 7.6 There are two other principal elements of this proposal – the new entrance onto Drury Lane which would provide a sheltered entrance including lift access directly from that street, and the bar/café extension of 241sqm which would infill an existing undercroft courtyard area to the rear (western end) of the existing hotel site at podium level.
- 7.7 The application site is an existing hotel in the Central London area, where there is a high and increasing demand for visitor accommodation. The development proposes 55 new 'windowless' hotel rooms located below the podium level of the existing building. This style of hotel room is an emerging typology in the short-stay/budget market that is becoming increasingly common in urban areas where demand for visitor accommodation is at its highest.
- 7.8 The existing hotel floorspace, plus the newly proposed expanded bar/café area and entrance including improved level access arrangements, provides ancillary areas in support of these new rooms, and the development is expected to create at least five permanent new full time jobs as a result of the increase in floorspace, as well as jobs in construction, training and apprenticeships for local people. Further details of employment measures secured are provided in the 'employment and training opportunities' section below.
- 7.9 The existing hotel operates over a period of 24 hours and is effectively managed on this basis. There are no plans to change this arrangement as part of this application.
- 7.10 Therefore, as there is strong policy support for expanded hotel accommodation in the Central London area from both the Local Plan and the London Plan due to increasing demand for visitor accommodation, which this proposal would help to meet, as well as providing a contribution towards delivering jobs and economic growth in Camden, it is considered that the provision of new hotel accommodation at this site is acceptable in principle in land use terms, subject to all other relevant material considerations also being acceptable as discussed in the sections below.

#### ***Non-provision of self-contained housing***

- 7.11 Policy H2 of the Local Plan states that where new development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses. The policy continues to state that, in the Central London Area (CLA), development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing.

- 7.12 As this development proposes more than 1,000sqm of new floorspace it is considered that housing is required as part of this development. However, it is acknowledged that the site is highly unusual in terms of its physical appearance and layout, given the hard surfacing that covers the site, the extreme variations in height across it, and the various undercrofts, service roads and infill buildings that are located throughout it. This creates very substantial practical limits to the appearance, layout and typology of housing that could be provided on this site. These limits are likely to be very challenging to overcome.
- 7.13 As such, it is considered that on-site housing would not be considered suitable in the specific circumstances relating to this development proposal. The nature of the dense urban environment of the local area also means that there are no other appropriate developable sites immediately available nearby where housing could be provided instead.
- 7.14 Therefore, Policy H2 allows that, in an exceptional situation such as this, a payment in lieu of providing new housing on-site may be secured instead. This has been calculated at £762,750 (1,017sqm x 50% x £1,500) and shall be secured through S106 legal agreement.

## **8. QUALITY OF HOTEL ACCOMMODATION**

- 8.1 The NPPF (Paragraph 135), the London Plan, and Local Plan Policy A1 seek to secure a good standard of amenity for all future occupants of buildings.
- 8.2 The principle of subterranean hotel rooms has already been established within Camden through planning application ref. 2015/3605/P at 112A Great Russell Street (St. Giles Hotel), which was allowed at appeal on 04/11/2016. both those permissions related to the conversion of basement car park levels to windowless hotel rooms, in a similar manner to this application.
- 8.3 Similarly, planning permission and listed building consent (refs. 2023/3870/P and 2023/3901/L) are to be granted subject to completion of a S106 agreement for the infilling of an underground car park to provide windowless hotel rooms at the Brunswick Centre, following a resolution in favour of this being given by Planning Committee on 21<sup>st</sup> March 2024.
- 8.4 As part of the 2016 appeal decision the Inspector noted that visitors to London have a wide choice of hotel accommodation, and that as part of that choice some people may decide that the benefits of a highly accessible location, close to a range of visitor attractions, would outweigh the absence of a window and the related amenities that would bring in terms of daylight, ventilation or a view. The decision to book a room with a window, or not to do so, rests with the visitor.

- 8.5 The hotel provider is proposing to utilise mechanical ventilation to allow fresh air to circulate within the proposed hotel room spaces to maximise the quality of these spaces, which would otherwise remain as void storage and car parking areas. Lighting within the rooms would be automatically triggered ambient lighting. See Figure 4 below for an example of room lighting and layout. The location of vents for the ventilation units must be set away from sources of pollution to protect internal air quality. This matter can be controlled by condition (condition 8).



*Figure 4 – Image of an example hotel room*

- 8.6 All of the proposed rooms would have access to the same facilities as the existing rooms, including the proposed bar/café and the new lift access.

- 8.7 Noise from local streets is not expected to be significant enough to impact on the quality of accommodation given that none of the proposed rooms would be located immediately adjacent to either Drury Lane or Shorts Gardens, due to their siting within the centrally located void area of the existing building. All rooms are expected to be appropriately insulated.
- 8.8 Six of the 55 rooms (11%) would be adapted for ease of access by wheelchair users. This proportion of accessible guest rooms will be secured by condition (Condition 6). Level access to these rooms would be available via either the proposed new lift or via an existing ramp access at the rear of the site onto Shorts Gardens.
- 8.9 The standard of accommodation is therefore considered to be acceptable.

## **9. IMPACT ON NEIGHBOURING AMENITY**

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works is also relevant and this will be dealt with in the 'Transport' section below. The thrust of these above policies is that the quality of life of current and future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

### ***Daylight and sunlight***

- 9.2 A Daylight & Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties.
- 9.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 9.4 Paragraph 129 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.
- 9.5 The approach is supported by the London Plan. The LP Housing SPG states:



*The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.*

### Methodology

- 9.6 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
  - *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
  - **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
  - *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
  - **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
  - *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*
  - **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
  - *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*

### Assessment

- 9.7 The proposed development would mostly infill an existing car parking and service area that is located below the existing podium and is almost entirely invisible from public areas. The two elements of the proposal that would be

erected above ground are the new two storey entrance onto Drury Lane and the bar/café extension to the rear of the site. The entrance structure would be separated from properties on the opposite side of Drury Lane by 9 metres. The bar/café extension would infill space below the existing nine-storey rear elevation of the hotel and would be sited 12 metres from the homes within Dudley Court to the west, which are separated from the host site by the existing service access road.

- 9.8 The Daylight & Sunlight Report has assessed the daylight and sunlight impacts to 50 windows serving 26 habitable rooms at seven properties closest to these new structures. The properties assessed are all on Drury Lane (nos. 180-187 including Goldsmith Court).
- 9.9 Properties within Dudley Court have not been assessed due to the infill nature of the proposed extension on that side of the site, which would replace an existing two storey curtain wall. As such, there would be no impact on properties to the west as the western elevation of the existing building would essentially appear the same (in terms of scale and mass and also in terms of detailed design) after the erection of the proposed development. See Figure 5 and 6 below for a comparison of the existing (top) and proposed (below) rear elevation.



Figure 5 – Existing rear elevation (lower part only)

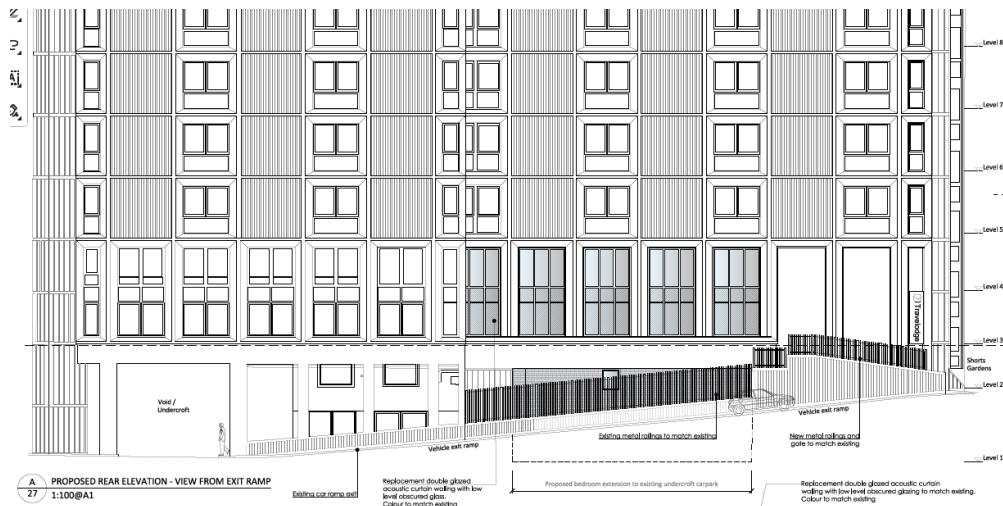


Figure 6 – Proposed rear elevation (lower part only)

- 9.10 The Drury Lane properties assessed would not be impacted at all, due to the size and scale of the host building and neighbouring buildings to the south which significantly screen sun and daylight from neighbouring residential properties to the east already. As such, the impact on the surveyed windows/rooms would be minimal and thus certainly within acceptable tolerances that would ensure compliance with the BRE guidelines.
- 9.11 There are no local public amenity spaces that would be overshadowed by this development proposal.
- 9.12 As such, it is considered that there is no noticeable negative impact to nearby residential properties from a loss of daylight and sunlight.

### **Outlook and Privacy**

- 9.13 The new hotel rooms would not have windows due to their siting below the existing hotel podium level. As such, they would not overlook any nearby residential properties. The proposed new two storey entrance would be located on the opposite side of Drury Lane to residential flats. The separation distance between the new entrance and these flats would be approximately 9 metres. The new entrance would be glazed at both ground and first floor level. The upper level would be set back from the street so that the separation distance from the top of the internal stairwell would be at least 12 metres from the windows of neighbouring flats.
- 9.14 The local area is a busy commercial frontage and as such it is considered that the pedestrian activity at ground level would not create any additional negative impacts to local residents in terms of increased overlooking.
- 9.15 The new entrance would replace existing steps that currently allows hotel patrons unrestricted outlook towards the flats opposite as they leave the hotel reception area, which is at podium level. Furthermore, there is nothing

to prevent passers-by from stopping to rest on these steps, further increasing potential overlooking towards the buildings opposite the site.

- 9.16 By bringing the steps into the domain of the hotel they would no longer be used for sitting by the general public which reduces the potential degree of overlooking experienced by the residents opposite. Furthermore, the extent of the steps would be reduced to enable the lift to be provided. Patrons of the hotel would be encouraged to linger in the hotel reception and extended café/bar areas, where seating is provided, rather than within this more spatially restricted entrance zone. Features of the design including the cladding panels that frame the windows would also help to minimise outlook towards nearby residential properties. The first floor windows would also be partially obscured by a panel to ensure that lift-related equipment is not clearly visible from the street. As such, overlooking from the first floor of the new entrance building towards neighbouring properties would be reduced compared to the existing situation with the publicly accessible steps.
- 9.17 The proposed café/bar area at rear would infill an existing undercroft area. As shown in Figures 5 and 6 above, the rear elevation facing Dudley Court would appear very similar in the proposed situation to the existing elevation. The replacement elevation would include obscure double glazing which would prevent outlook towards residential properties to the west.
- 9.18 In respect of outlook from nearby flats, the relatively low height and massing of the new entrance structure, particularly in relation to the 12 storey host building, means it would not appear imposing in outlook from such properties. The infill nature of the new rooms beneath the podium and the café/bar extension also means these elements would not impact on the outlook of neighbouring properties to the west of the site.
- 9.19 As such, it is considered that the proposals would not increase overlooking or negatively impact on the outlook of nearby residential properties and as such the development is considered acceptable in terms of its impact on outlook and privacy.

### ***Noise and Artificial Light***

- 9.20 The below ground rooms would not have windows and would also be insulated from the outside environment and as such would not directly create enough noise to disturb nearby residents. The replacement rear elevation proposed as part of this development would include both double glazing and an acoustic curtain walling design that would minimise noise emissions from the bar/café. This would sufficiently protect the amenity of residential properties located to the west of the site.
- 9.21 The increase in the number of rooms at the site would also increase the number of patrons visiting the hotel premises. Many patrons would be

expected to access the hotel via the new entrance, especially those with mobility needs or heavy luggage who would be keen to use the lift, though it is noted that another pedestrian access to the hotel also exists at the corner of Drury Lane and Shorts Gardens that is very prominent in the street scene particularly for visitors arriving from the east or south.

- 9.22 The new entrance has been designed to encourage patrons into the site, with waiting and congregating occurring within the expanded reception and bar/café area, rather than on the pavement on Drury Lane which is currently quite narrow. It is considered that currently groups are able to congregate on the landing to the northernmost stairway, in front of the reception area, or on the steps themselves. This will not be possible should the new entrance be built. As such, although an increase in patrons for the hotel is likely as the result of the expanded provision of rooms, it is considered that any potential increase in noise disturbance would be appropriately mitigated by the design of the entrance which would enable the waiting and congregating of groups to take place inside the hotel premises.
- 9.23 Vehicle disturbance is not expected to increase significantly on the existing situation. Most trips to the site are anticipated to be via active travel modes such as walking or cycling or via public transport. Taxi pick-up and drop-off activity is likely to increase as the result of these proposals but will be limited to specific areas away from residential properties where possible. Groups arriving in coaches would not be permitted to unload or pickup outside of this new entrance and would have to use local coach parking bays instead. Taxi and coach arrangements will be secured through s106 legal agreement. As such, increase in vehicle movements and drop-off/collections is not anticipated to be significant enough to cause a reason for refusal in this case.
- 9.24 The Council's Noise Officer has assessed the potential impact of noise from proposed plant equipment with reference to the acoustic assessment that has been submitted with the application. The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the existing building. The Noise Officer is satisfied that the submitted acoustic submission meets the guidelines in the Local Plan and therefore, subject to conditions restricting noise levels and preventing vibration of equipment (Conditions 16 and 17) would not have an adverse impact on the nearest residential properties with these mitigation measures as specified.
- 9.25 There would be lighting within the new two storey entrance structure and the extended bar/café area, however this would not be above that which would be expected from a typical commercial frontage in this existing commercial area and as such it is considered that a limited degree of additional light spill would not lead to excessive light disturbance to nearby

residential properties. External lighting is intended to be provided to public areas around the building to improve security and detector-activated lighting would be provided to recesses and doorways. External lighting would be designed not to spill excessively towards nearby residential properties. This can be secured by condition (Condition 11).

- 9.26 As such, it is considered there would be no unacceptable impacts on nearby residential properties in terms of disturbance from excessive noise or light spill.

## **10. DESIGN AND HERITAGE**

- 10.1 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Camden's Local Plan is supported by CPG (Design).

### ***Site and its surroundings***

- 10.2 The host building is formed of several elements of varying heights and is almost entirely covered by hard surfacing. The existing hotel has evolved over time with the linked buildings that were originally in differing uses – the former Drury Lane Moat House hotel and former British Telecom offices at St Giles House – now combined to form a single Travelodge hotel. The buildings extend over twelve stories including an existing podium which sits above a car park and back of house service area. These lower ground areas combine to create a double height void space below the existing podium.
- 10.3 The surrounding area is heavily urbanised and is mixed-use in land use and character. The primary uses are commercial with a mix of retail, office, and hotel uses evident. Residential accommodation is also provided for in the local area.
- 10.4 To the east of the site on Drury Lane, there are several mostly independent retail shops and cafes with residential and office uses above. These buildings are generally of late 20th Century design and are four to five storeys in height in the main, although some lower height buildings are also evident, particularly immediately opposite the site to the east. These buildings fall within the Seven Dials Conservation Area that extends eastwards from the centre of Drury Lane. Listed buildings are also located opposite the site which are discussed further below.

- 10.5 Immediately adjacent to the proposed new front entrance, on the western side of Drury Lane, there are three Class E retail units.
- 10.6 To the west of the site is Dudley Court, a 'U' shaped building backing onto the adjacent leisure centre (fronting High Holborn) and office. Dudley Court primarily comprises residential sheltered accommodation flats and an NHS medical centre.
- 10.7 To the south of the site is Shorts Gardens and the side elevation of 17-20 Drury Lane and 60-72 Shorts Gardens. This street is also within the Seven Dials Conservation Area.
- 10.8 High Holborn is located north of the site, which is a substantial thoroughfare characterised by commercial, residential and leisure uses. Abutting the hotel to the High Holborn frontage to the west is the fourteen storey LSE student accommodation building.
- 10.9 The primary pedestrian entrance to the existing hotel is from the podium level entrance courtyard located off Drury Lane that is accessed by two flights of steps; one at the corner with Drury Lane and Short's Gardens and another further to the north fronting solely onto Drury Lane.
- 10.10 Another entrance is available via an accessible ramp is located to the rear of the site onto Short's Gardens which currently provides the only level access to the site for hotel customers. The podium level (level 3, above the lower ground levels 1 and 2) is considered the ground floor to the hotel and it is this area that accommodates the hotel's entrance, reception and existing bar/cafe facilities.

#### ***Designated and non-designated heritage assets***

- 10.11 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 10.12 The designated heritage assets in the local area include the Seven Dials Conservation Area, which is adjacent to the site on its east and south sides, and 186 and 187 Drury Lane opposite the site, which are Grade II listed. These buildings are early 18<sup>th</sup> Century buildings finished in multi-stock brick that were originally terraced houses with ground floor shop units added later.
- 10.13 Nos. 181-183 Drury Lane, which are also located opposite the site, are positive contributors to the Conservation Area (CA).

- 10.14 Non-designated heritage assets include 181 High Holborn, on the corner of Drury Lane and High Holborn, which is locally listed.
- 10.15 It is relevant to note that the application site is located outside the CA and is not a designated or non-designated heritage asset.

***Design and heritage assessment***

- 10.16 The development proposal consists of three main parts: the proposed hotel rooms that would infill the area below the podium; the proposed new double height entrance onto Drury Lane, and; the extension of the existing reception area at podium level to form a new bar/café area at rear.
- 10.17 The new hotel rooms and the café/bar extension would not significantly affect the appearance of the existing building. The only elements of these parts of the proposal that would be visible from the surrounding area would be the rear wall of the infill below the podium that constitutes the new hotel rooms and the replacement curtain walling and windows at the rear of the café/bar. These elements of the proposal would be visible from Shorts Gardens only.
- 10.18 The rear wall of the new hotel rooms would be predominantly screened from Shorts Gardens by the existing service ramp and railings. This lower ground level infill would be finished in grey brick to match the existing building. The works would be set back into the site from the street, within an existing service yard area, and would not be clearly visible in public views. It is therefore considered to be a minor functional addition to the street scene that is consistent with the service yard character of its siting. It would not harm the setting of the conservation area, from within which it would only be marginally visible. It would also not impact significantly on the character and appearance of the host building or the surrounding area.
- 10.19 The rear of the bar/café would replace the existing rear wall at podium level with a new curtain wall and windows of a practically identical appearance. The glazing on the lower parts of this double height elevation would be obscured, as is the case currently (see image below).





*Figure 7 – View of existing rear elevation from Shorts Gardens*

10.20 As such, this element of the proposal would also not harm the setting of the conservation area, from within which it would be marginally visible. It would also not impact significantly on the character and appearance of the host property or the surrounding area.



*Figure 8 – Image of proposed rear elevation from Shorts Gardens*

- 10.21 The most visible part of the development proposal would be the provision of the new double height entrance onto Drury Lane. The applicant wishes to provide a new entrance in this area to improve the accessibility of the site through installation of a lift as well as the general arrival experience for patrons. The entrance would enable level access to be provided directly off Drury Lane into a dedicated entrance lobby, with direct access thereafter into the main reception and other supporting facilities. Currently, the only level access to the site is not from Drury Lane but from the rear of the site accessed off Shorts Gardens. This ramped access is poorly lit, narrow, has a utilitarian character and requires individuals that require level access to use a separate secondary access that is at least 50 metres away from the existing main entrance.
- 10.22 The existing northern stairway and associated courtyard areas are currently underutilised due to their shaded nature and the greater visual prominence of the wider stairway located at the corner of Drury Lane and Shorts Gardens. The provision of a new entrance, as well as providing the accessibility benefits referenced above, would create a clear street presence for the hotel onto Drury Lane and would act as an extension of the existing secondary commercial frontage onto that street (which currently includes the shop units at 14-18 Drury Lane) through providing active frontage and natural surveillance onto the street in this area.



*Figure 9 – Proposed new entrance from south on Drury Lane*

- 10.23 The lower floor of the structure aligns with the street frontage and the height of the shop units to the south. The upper floor is set back, which enables the proposed lift to connect more directly to the reception area at podium level. This design and layout would also provide for an open welcome area

at ground level which would enable any arriving groups to shelter within the structure rather than lingering on-street.

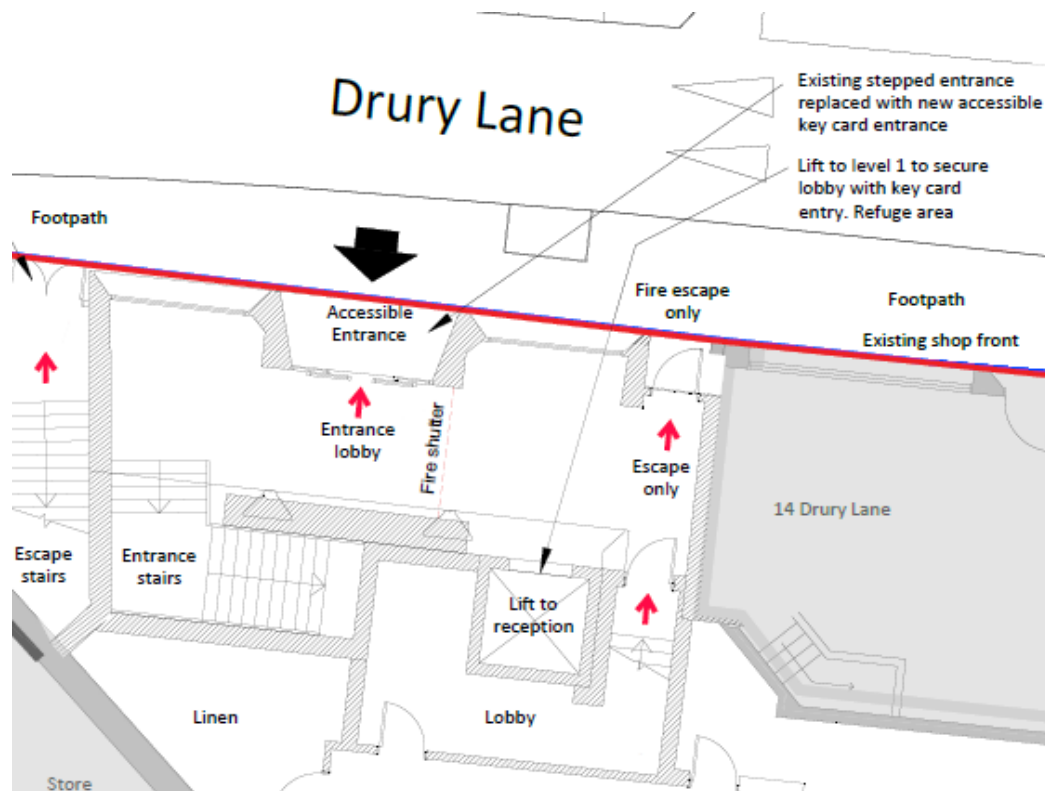


Figure 10 – Ground floor layout of new front entrance

- 10.24 The structure has been carefully designed to reflect key features of the main hotel building, including using a bespoke concrete finish to match, integrating series of bays and reflecting the mullions and transoms of its windows. Compared to the scale of the main hotel which extends up to 12 storeys in height this two storey feature with a set back upper level would be a relatively modest feature in terms of size and scale that would appear restrained in its surroundings and would not dominate the street scene. The proposed entrance would not appear as an excessively prominent feature when viewed from within the conservation area or from adjacent to the nearby listed and locally listed buildings across Drury Lane. Therefore, it is considered that this element of the proposal would not harm the setting of the conservation area, and would not harm the setting of nearby listed buildings or non-designated heritage assets. It would also not impact significantly on the character and appearance of the host property or the surrounding area.
- 10.25 The development proposal would also provide green/blue roofs above both the new entrance extension and above the existing shops on the west of Drury Lane, which would improve the visual appearance of this property from the upper levels of local residential properties. It is also proposed to re-paint the shop units to the front of the site as part of this proposal.

- 10.26 Other proposed improvements to the building include replacement of railings to the service area, addition of a security gate to the ramp off Shorts Gardens, and provision of a new handrail for the remaining stairway. These alterations and additions would further improve the security and accessibility of the building.
- 10.27 New lighting and CCTV will be provided to improve the security of the site and local area. Details of lighting will be secured by condition (Condition 11). The Metropolitan Police's Designing Out Crime Officer has raised no objections to this proposal.
- 10.28 Subject to the recommended conditions (Conditions 2 and 4) ensuring the detailed finishes and materials are executed in line with the high quality of design, the proposals would be sympathetic to the character and appearance of the local area and would be of an appropriately high standard which would preserve and enhance the character and appearance of the surrounding conservation areas and nearby listed buildings.
- 10.29 The Council's Conservation Officer has assessed the proposed development and has determined that there would be no harm to local heritage assets.
- 10.30 Officers therefore consider that as there is no harm arising to the setting of the Seven Dials Conservation Area from the infilling of the stairwell with a new double height entrance building and the extension of the bar/café area to the rear, nor would there be any harm to the setting of the nearby listed and locally listed buildings, and also noting the new hotel rooms would be constructed almost entirely underground below the existing podium, it is considered that there is no negative heritage impact from the proposed development. Nevertheless, it is also considered that the proposal brings significant public benefits including meeting a demand for hotel accommodation, provision of new permanent jobs and temporary construction jobs, significantly improving access to the site, improved safety and security of the site and local area, and other associated benefits.
- 10.31 Special regard has been attached to the desirability of preserving nearby listed buildings and their features of special architectural or historic interest, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.
- 10.32 Special attention has also been paid to the desirability of preserving or enhancing the character or appearance of the nearby conservation area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.
- 10.33 Therefore, it is considered that the proposed development is acceptable in design and heritage terms.

## 11. SUSTAINABILITY AND ENERGY

11.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

11.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

### ***Redevelopment strategy***

11.3 The development predominantly infills an existing double height below ground space that is currently used for car parking and servicing. The remainder of the development would infill existing space within the site in a rear undercroft and front stairway. No substantial demolition is proposed as part of this application. Some excavation of the stairwell may be required to enable the provision of the new entrance however this is relatively minor given the scale of the development and unavoidable if a new entrance is to be located on Drury Lane.

### ***Energy and carbon reductions***

11.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

11.5 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

### **Energy and carbon summary**

11.6 The following summary table shows how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	15%	18.5 %
Be green stage (renewables): CLP policy CC1	20%	25.2 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	39 %

*Table 1 - Carbon saving targets (for majors) and the scheme results*

- 11.7 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 11.8 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 11.9 This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30-year period) which in this case is 12.16 tonnes x £95 x 30 years = £34,652. This amount will be spent on delivery of carbon reduction measures in the borough.
- 11.10 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 39% below Part L requirements as shown in Table 1 above. The carbon offset of £34,652 will be secured by Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 11.11 London Plan policy SI 2 sets a policy target for non-residential development of at least 15% reduction through reduced energy demand at the first stage of the energy hierarchy.
- 11.12 In this case, the development exceeds the policy target of 15%, reducing emissions by 18.5% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing and lighting, and improved efficiency of heating and cooling equipment. The proposal includes energy efficient measures like mechanical ventilation heat recovery (MVHR) and low energy light fittings.

Be clean stage (decentralised energy supply)

- 11.13 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

11.14 In this case an assessment of the existing London Heat Map has been made and it has been demonstrated that there are no existing local networks present within connectable range of the scheme. The applicant has confirmed that they have space on site for a heat exchanger and thermal stores and as such is able to install pipework to their boundary to enable connection to a heat network in the future. This can be secured through s106 legal agreement.

Be green stage (renewables)

11.15 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

11.16 In this case, the development exceeds the policy target of 20%, reducing emissions by 25.2% at this stage through renewables, in compliance with the development plan. The proposal includes air source heat pumps to generate space heating and cooling.

11.17 There are no photovoltaic (PV) panels proposed on the roofs of the new above ground structures due to relatively small roof sizes and the layout/orientation of the available roof areas not providing high levels efficiency of any proposed panels due to their overshadowing by existing buildings. Whilst the minimum required reductions in carbon from renewables would be met by this development it is considered that an increased provision of PV panels is possible on the existing hotel to a degree that would be justifiable, and which would further offset the carbon from this development. Provision of additional PV panels on the roof of both the proposed and existing buildings must be explored and this can be secured by condition (condition 10).

11.18 The same condition will also secure a meter to monitor the energy output from the approved renewable energy systems (condition 10).

Be seen (energy monitoring)

11.19 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting through the provision of energy monitoring equipment.

11.20 The Energy and Sustainability Strategy secured by Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.

### ***Climate change adaption and sustainable design***

- 11.21 Local Plan policy CC2 expects non-residential development to meet BREEAM Excellent.
- 11.22 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 11.23 The BREEAM pre-assessment submitted with this application indicates an overall score of 63% which is very good. This does not meet the requirement of BREEAM 'excellent' as stated in Policy CC2. The development proposal meets the Council's minimum credit targets for energy (60%), water (60%) and materials (40%). It is appreciated that due to the infill nature of most of the proposed extensions and other constraints from the design of the existing building and the site location the target of excellent is unachievable for the proposed development. The Council's Sustainability Officer has reviewed the submitted pre-assessment and acknowledges that the target of very good is the maximum that can be achieved by this development. However, there may be scope for further improvements to the number of BREEAM credits that can be secured. The applicant will be required to investigate securing further credits as part of the Energy and Sustainability Strategy, which will be secured by s106 legal agreement.
- 11.24 The development incorporates blue/green roofs, which would enhance the biodiversity of the site and reduce surface water runoff. Details of this system will be secured by condition (condition 5). Furthermore, condition 19 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the 'Flood risk and drainage' section of this report below.

## **12. FLOOD RISK AND DRAINAGE**

- 12.1 Policy CC3 states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The Council will require development to:
- a. incorporate water efficiency measures;
  - b. avoid harm to the water environment and improve water quality;
  - c. consider the impact of development in areas at risk of flooding (including drainage);
  - d. incorporate flood resilient measures in areas prone to flooding;
  - e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
  - f. not locate vulnerable development in flood-prone areas.



- 12.2 Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.
- 12.3 A Flood Risk Assessment and Drainage Strategy Report has been prepared in accordance with local and national planning policy and guidance documents including the London Borough of Camden SFRA, the London Plan and the NPPF. The proposed development complies with local and national planning policy on food risk and sustainable drainage.

#### Review Summary

- Flood risk: Not on a previously flooded street or in a Local Flood Risk Zone. Within Critical Drainage Area Group3\_005.
  - Types of conveyance/attenuation features: Blue/green roofs, below ground attenuation tank.
  - Greenfield runoff rate: 0.1 l/s.
  - Runoff rate restriction (l/s): 5.63 for a 1 in 100 yr +40% CC scenario
  - Runoff attenuation volume (m3): Blue roof – 11.5m3
- 12.4 The Council's Lead Local Flood Authority Officer has reviewed the submitted documentation. No flooding is expected during storm events. With consideration to the scope of works for the development, flood mitigation measures have been provided in the form of blue/green roofs and the existing basement attenuation tanks which would enable water to discharge to the combined sewer at a restricted rate. The runoff rate would be increased but this would be restricted at a controlled rate via a restrictor valve in the blue/green roof, and the attenuation tanks would discharge via a pumping station into the combined sewer within Shorts Gardens at a stepped rate. This would ensure there is a low risk of flooding from this development. Overland water flows would be directed towards local drains which is acceptable.
- 12.5 The development proposals meet the requirements of national and local planning policy from a flood risk and drainage perspective. Conditions (5 & 7) would be secured requiring the submission of sustainable drainage details (including blue/green roofs and info regarding the existing attenuation tanks) including the installation and maintenance of the drainage systems.

### **13. ECOLOGY AND BIODIVERSITY**

- 13.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible.
- 13.2 Policy G5 of the London Plan states that new major developments should contribute to urban greening. This includes securing an urban greening factor

for of 0.3 for commercial developments. Policy G6 of the London Plan requires improvements (net gain) in biodiversity on the site.

13.3 The site is not a designated ecological zone and is currently covered with hard surfacing, other than the existing green roof above the podium level infill building which provides for the hotel's reception area. No trees would be impacted by this proposal. The proposed development would incorporate three separate green/blue roofs to the eastern side of the site, above the proposed new entrance building and also above the existing retail units that front onto Drury Lane.

13.4 The green/blue roofs would cover an area of 174sqm. This would significantly improve the greening of the site. The applicant has claimed that the urban greening factor would be 0.31 which meets the required policy targets of the London Plan. No detailed urban greening factor plan has been provided in support of the applicant's position. However, the green roof areas shown on Figure 11 below shows significant levels of greening.

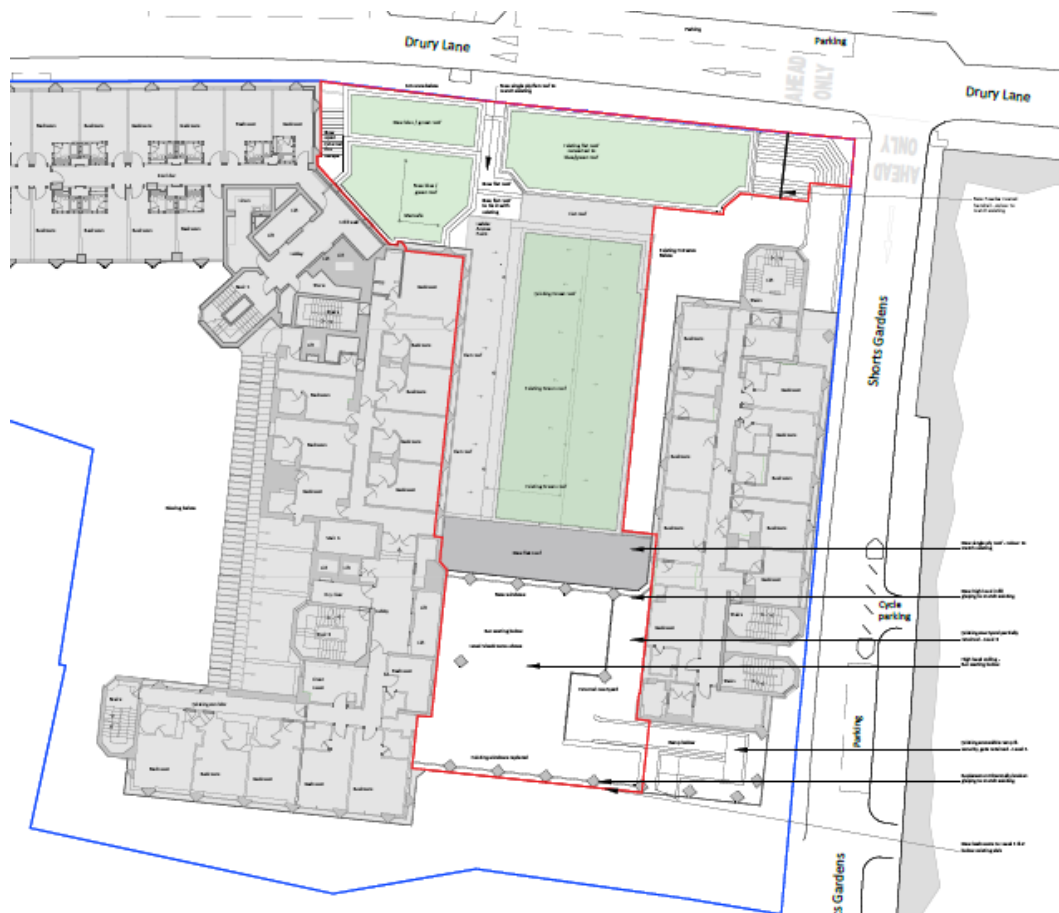


Figure 11 – Green roof plan

13.5 It is noted that this site and the proposed development have unique characteristics which make the comprehensive provision of biodiversity features difficult to achieve, including the substantial provision of existing hard surfacing, a range of roof typologies many of which are currently used

for plant equipment, many changes in land level, significant overshadowing of lower levels and the provision of the majority of the proposed development underground. However, it is considered that further investigations regarding the potential installation of biodiversity features, for example green roofs, throughout the hotel site could improve the current provision to a point at which the 0.3 target score could be met. This further investigation shall be secured by condition (Condition 9).

- 13.6 The application was submitted on 5<sup>th</sup> February 2024 which is prior to the current biodiversity net gain regulations coming into force on 12<sup>th</sup> February 2024. As such, this application is exempt from those new regulations which introduced statutory requirements for 10% Biodiversity Net Gain through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits. Nevertheless, the development would provide an increase in biodiversity at the site through the provision of the green/blue roofs which would meet the requirements of policy A3 of the Local Plan and policy G6 of the London Plan.
- 13.7 Full details of the green/blue roofs shall be secured by condition (including details of substrate, species and other relevant matters) (Condition 5).

#### **14. AIR QUALITY**

- 14.1 The whole of the Borough of Camden was declared an Air Quality Management Area (AQMA) in 2002 due to concern over the achievement of the long-term NO<sub>2</sub> AQS objective and short-term PM<sub>10</sub> AQS objective. Camden's Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality. Policy SI1 of the London Plan 2021 requires developments to be air quality neutral.
- 14.2 The applicant has submitted an Air Quality Assessment (AQA) report with the application. The AQA has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction, and emissions from road traffic generated by the completed and occupied development. It has also identified whether or not the proposed development is air quality neutral (as required by the London Plan).
- 14.3 The proposed development would be car free which reduces car use from the existing site significantly. The heating demand for the new units being provided would be through ASHPs and not combustion heating. The development would also use an existing backup generator as there is no need for a new one. As such, the development is considered to be air quality neutral.

14.4 There would be no construction works occurring above the first floor level of the existing site. The submitted documentation shows that there is a medium risk of dust from construction work and it is considered that this can be mitigated through real-time monitoring of such works, as well as through a construction management plan, which can be secured through a Section 106 legal agreement.

14.5 As such, it is considered that the proposed development would be compliant with Camden Council Local Plan as well as with Policy SI1 of the London Plan.

## **15. TRANSPORT**

15.1 London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor's strategic target of 95% of all trips in central London to be made by foot, cycle, or public transport by 2041.

15.2 London Plan Policy T1 also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

15.3 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.

15.4 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. The Holborn Liveable Neighbourhood (HLN), which is an infrastructure priority scheme, is located opposite the site to the east.

15.5 Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets out our objectives, policies, and measures for achieving this goal. In 2023 we reviewed our progress so far on the CTS and also set out our delivery plan for the period covering 2024/25. This was presented to Culture and Environment Scrutiny Committee on 6th February 2024. The plan includes commitments, all of which are pertinent to this application, and which will be expanded upon in later sections, to: introduce segregated cycle lanes on Shaftsbury Avenue segregated cycle corridor (primary route), which form part of a borough wide 'Healthy Routes - strategic cycling corridors' programme of works; continue

to expand the Council's dockless bike and e-scooter hire network, and; to contribute towards the implementation of the CTS Cycling Action Plan.

### ***Site and its Surroundings***

- 15.6 The site is located in the Central London area. High Holborn (A4) located approximately 50m north of the site forms part of the Strategic Road Network (SRN). The Council is the highway authority for the roads surrounding the site and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- 15.7 The closest London Underground stations are Tottenham Court Road and Holborn, located approximately 500m west and 450 east of the site respectively. Tottenham Court Road station also provides Elizabeth Line services. The closest bus stop is located on High Holborn (A4) approximately 100m north of the site.
- 15.8 The site is easily accessible from the Strategic Cycle Network with Cycleway C10 to the west at Endell Street and C52 to the south at Great Queen Street. The nearest Santander cycle hire docking station is located on High Holborn (A4) approximately 60m north of the site.
- 15.9 There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on St Giles High Street, Endell Street and Great Queen Street. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

### ***Trip Generation***

- 15.10 The proposal includes an additional 55 new hotel bedrooms, to provide a total of 520 rooms. The TRICS database was used to derive the anticipated person trip rates generated by the proposed extension, with one site used for analysis: Hampton by Hilton hotel at 157 Waterloo Road, London, SE1 8XA. A significant proportion of trips are projected to be taken by active travel or public transport. The vehicle trips will mainly comprise taxi pick-up / drop-off activity.
- 15.11 Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Tottenham Court Road and Holborn London Underground stations, bus stops on High Holborn (A4), and commercial, entertainment, shopping, and restaurant venues in Holborn.

- 15.12 Considering the increase in active travel to and from the site, a financial contribution should be secured through legal agreement towards the HLN and segregated cycle lanes on Shaftsbury Avenue (see below in para 15.25).

***Car parking and vehicle access***

- 15.13 The site is located in controlled parking zone CA-C (Single Yellow lines), which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday, with 24hrs Residents Bays. Vehicle access to the lower ground floor car park is from High Holborn to the north, whilst the exit is at Shorts Gardens to the south. The existing 24 car parking spaces will be removed, except for two accessible parking bays which will be retained on-site. The development is proposed as car-free except for these two parking spaces on the lower ground floor in line with Policy T2.
- 15.14 Officers expect most guests and staff to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policy A1.

***Coach parking and taxis***

- 15.15 There is an on-street coach parking bay located to the northwest of the site on High Holborn (A40) approximately 90m from the hotel. It is proposed to use this bay if coach parking is required.
- 15.16 The Council's Transport Officer has stated that coach parties (which may be outside the applicant's control) have the potential to cause delays and safety issues on Drury Lane and in close vicinity of the hotel if they are not effectively managed. Therefore, a planning obligation will be secured by legal agreement to ensure that no customers shall be picked up or dropped off by coach directly outside the hotel at any time, in accordance with Camden Local Plan Policy E3 (paragraph 5.60).
- 15.17 Taxi drop-off or pick up is proposed to take place on the street nearby where there are single yellow lines and taxi stands. The applicant must detail suitable locations to accommodate the taxis. This is especially relevant given the projected increase in taxi trips. This can be secured through the s106 legal agreement.

### ***Cycle parking, micromobility and travel plans***

- 15.18 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for C1 use, hotels: 1 space per 20 bedrooms long-stay, and 1 space per 50 bedrooms short-stay.
- 15.19 4 long-stay, secure and sheltered cycle parking spaces will be provided at the lower-ground floor level, where the existing cycle parking is already located, with a step free access by the use of the existing ramp. 2 short-stay cycle parking spaces will be provided at the hotel's Short's Gardens frontage in a form of a Sheffield type stand.
- 15.20 In total, 34 cycle parking spaces will be provided which meets the requirements of London Plan Policy T5 (Table 10.2) for the total of 520 hotel rooms that would be provided on site. TfL have requested that additional cycle parking is provided if possible and that cycle parking is provided in accordance with the London Cycle Design Standards. Further details can be secured by condition (Condition 12).
- 15.21 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured through a Section 106 legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.
- 15.22 A draft Travel Plan is contained within the Transport Assessment in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The projected modal share for walking and cycling is considered acceptable.
- 15.23 A Travel Plan, which should be a dedicated document covering all proposed uses, and an associated monitoring and measures contribution of £11,348, will be secured by legal agreement. The Travel Plan will be targeted towards staff and visitors. TfL have requested that the applicant should also consider funding public transport for staff, providing cycle maintenance sessions and funding cycling equipment to incentivise mode shifts towards active travel. These matters can be secured through the same s106 legal requirement.

### ***Deliveries and servicing***

- 15.24 The proposed development has a potential to generate three additional servicing trips per day. It is confirmed that delivery and servicing will take place from the lower ground floor in line with the existing arrangements. The vehicles will enter the site from High Holborn and at Short's Gardens.

### ***Pedestrian, cycling and environmental improvements***

- 15.25 In line with the projected increase in walking and cycle trips generated by the development and further promoted by the draft Travel Plan, and given the need for pedestrian, road safety and public realm enhancements, the Council has secured a contribution towards several improvement schemes to enhance the pedestrian and cycling environment in the vicinity of the site. This includes £80,000 towards improvements proposed through the HLN project and segregated cycle lanes on Shaftsbury Avenue.

### ***Construction management***

- 15.26 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A Construction Management Plan was submitted; however, the document does not adhere to the Council's guidance.
- 15.27 The site is located in close proximity of High Holborn (A40) which forms part of the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday.
- 15.28 The Council's primary concern is public safety, but officers also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.
- 15.29 The Council expects construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council.
- 15.30 A more detailed CMP document will be secured by s106 legal agreement in accordance with Local Plan Policy A1. This should be prepared using the Council's CMP proforma. A CMP Implementation Support Contribution of



£10,116 and CMP Impact Bond of £16,000 would also be secured by legal agreement.

- 15.31 To mitigate for potential damage to the public highway caused during demolition and construction for this development a modest highways contribution of £20,000 would be secured by legal agreement which will also contribute to the resurfacing of the public footway on Drury Lane.

### **Conclusion**

- 15.32 The proposal is acceptable in terms of transport implications subject to conditions, and planning obligations as set out above being secured through s106 legal agreement.

## **16. LAND CONTAMINATION**

- 16.1 Policy A1 of the Local Plan states that the Council will grant development unless it would cause unacceptable contamination risks.

- 16.2 Potentially historic contaminative land uses on/in the vicinity of the site include a hospital, workhouse and unknown industrial use. However, as no ground level soft landscaped areas are proposed, the potential pathways for contamination to reach the surface at this site are very limited.

- 16.3 The Council's Contaminated Land Officer has reviewed this application and considers there to be a low risk to the development from potential contamination. In addition, no ground level soft landscaped areas are proposed, limiting potential pathways on site. A condition (Condition 15) is recommended in the event that potentially harmful contamination is encountered during the development.

- 16.4 The development is acceptable in terms of its contamination risks, subject to a condition.

## **17. FIRE SAFETY**

- 17.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.

- 17.2 A Fire Strategy Report prepared by a suitably qualified third-party assessor has been submitted with the application. The new build elements that form part of this proposed development would be constructed of non-combustible materials to at least a fire rating of A2-s1, d0 (very low combustibility). The development has been designed to meet Building Regulations requirements.

17.3 The London Fire Brigade has been consulted on this application and raises no objections subject to a continuing review of fire safety being undertaken by the developer in accordance with Building Regulations requirements.

17.4 As such, the application is acceptable in respect of its fire safety.

## 18. EMPLOYMENT AND TRAINING OPPORTUNITIES

18.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3mill construction costs. To ensure local people benefit from these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.

### *During construction*

- **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). Three apprenticeships are expected from this proposal with a related support fee of £5,100.
- **Construction Work Experience Placements** - the applicant should provide two construction work placement opportunities of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the council's Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

### *Post construction*

18.2 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments which will result

in a net increase of 1,000sq m (GIA) or more of employment space including office, hotel and leisure developments.

18.3 The proposal includes the provision of 55 new hotel rooms which is expected to provide five new jobs on site. The end use is a budget hotel chain and as such the number of jobs anticipated to be created by these extensions is not as great as it could be with a 'full service' hotel. As such, of these five jobs it is considered securing one as an end user apprenticeship for a rolling period of 5 years is considered acceptable. Local employment and training initiatives will also be supported by a financial contribution of £3,995 which will be secured through legal agreement.

18.4 The above measures would be included in a package of Employment and Training measures secured by s106 agreement in accordance with CLP policy E1 and the CPG.

## 19. COMMUNITY INFRASTRUCTURE LEVY (CIL)

19.1 The CIL applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.

19.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£140 x 1,017sqm = 142,380**.

19.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone A where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is **£110 x 1,017sqm = £111,870**.

## 20. CONCLUSION

20.1 The proposed development is for a two storey step-free entrance to the Drury Road elevation, the infilling of the rear undercroft to extend the existing hotel bar/restaurant and the infilling of the existing car park below the existing podium level to form 55 new hotel bedrooms, with a total of 1,017sqm of new hotel floor space provided.

20.2 The development would support the economic, social and cultural role of Central London, including Central Activity Zone functions, and would bring growth in jobs and economic activity to this part of Camden. It would help to meet the anticipated future growth in demand for visitor accommodation in London as identified by the Camden Local Plan and the London Plan. The existing business would remain suitable for a town centre location.

- 20.3 Policy H2 requires that in the Central London Area (CLA), development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing. However, the highly unusual design and layout of the existing building on the site creates significant practical limitations to providing housing on this site. Noting this and the lack of other suitable sites locally the Council has instead secured a the policy compliant payment in lieu of £762,750 towards housing in the Borough.
- 20.4 The detailed design of the two storey extension on Drury Lane would be of a high quality and has been developed through extensive discussions with officers in order to ensure it would not impact negatively on the character and appearance of the existing hotel or the local area, whilst also providing significant level access improvements for users of the hotel. There would be no harm to local heritage assets as the result of the proposal.
- 20.5 The amenity of local residents and businesses would not be adversely affected by the proposal as the development has been sensitively designed to manage potential noise and other impacts, and there would not no other negative impacts from a loss of daylight or sunlight, loss of outlook or privacy, or increased light spill.
- 20.6 The development would infill existing areas on the site and would not lead to extensive demolition. It would also meet the required carbon reduction targets and would remove most existing car parking spaces from the site which means the development would be air quality neutral.
- 20.7 The development would be car free other than for two wheelchair accessible parking spaces. Cycle parking provision at the site would increase.
- 20.8 The scheme complies with the development plan as a whole and as such it is recommended that the application is granted subject to a Section 106 legal agreement.

***Public benefits***

- 20.9 No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weigh against that harm.

- Meeting a defined demand for hotel accommodation in Central London
- Improvements to the local and wider London economy
- Provision of a contribution in lieu towards new housing in Camden
- Provision of permanent end user and temporary construction jobs
- Much improved level access to the hotel
- Improved safety and security
- Improved site biodiversity, ecology and drainage

- Other benefits as described in this report.

## **21. RECOMMENDATION**

21.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Housing Payment in Lieu Contribution of £762,750
- Energy and Sustainability Strategy
  - Including further investigations to maximise BREEAM credits
  - Including related reporting and monitoring
- Carbon Offset Contribution of £34,652
  - Figure to be reviewed if PV panels are provided
- Construction Management Plan (CMP)
- CMP Implementation Support Contribution of £10,116
- CMP Impact Bond of £16,000
- Car Free
- Travel Plan and Monitoring and Measures fee of £11,348
  - Including measures to incentivise shifts towards active travel
  - Consideration of subsidising public transport for staff
  - Consideration of provision of cycle maintenance sessions
  - Consideration of subsidising cycle equipment
- Highway Works of £20,000
- Micromobility Improvements of £10,000
- Electric Vehicle Charging of £20,000
- Holborn Liveable Neighbourhood & Public Realm Improvements of £80,000
- Coach and Taxi Management Strategy
- Heat Network Connection Plan
- Employment and Training Measures
  - One end user apprenticeship for a rolling period of five years
  - Three construction apprenticeships and support contribution of £5,100
  - Two Construction work experience placements
  - Local recruitment
  - Local procurement
  - Local employment and training contribution of £3,995

## **22. LEGAL COMMENTS**

22.1 Members are referred to the note from the Legal Division at the start of the Agenda.

## **23. CONDITIONS**

### ***Standard conditions***

#### **1 Time limit**

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

#### **2 Approved drawings**

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

Existing Drawings:

Site Location Plan; J9348/10 to 13 (all Rev. A), J9348/15 Rev. A, J9348/16.

Proposed Drawings:

J9348/20 Rev. H, 21 Rev. G, 22 Rev. F, 23 Rev. H, 25 Rev. M, 27 Rev. B, 32 Rev. C, 33 Rev. E, 34 Rev. E, 35 Rev. D, 43 Rev. D; IG22/185/201 Rev. P5.

Documents:

Air Quality Assessment dated February 2024, Level 1 FRA & Drainage Strategy Report dated February 2024, Environmental Sound Level Survey and Plant Noise Assessment dated March 2024, Design & Access Statement dated February 2024, Transport Statement & Travel Plan dated February 2024, Construction Phase SHEQ Management Plan dated January 2024, Covering letter dated February 2024, Security Needs Assessment dated February 2024, Planning Statement dated February 2024, Fire Strategy Report dated February 2024, Daylight & Sunlight Report dated February 2024, Heritage Statement dated February 2024, Energy Statement dated September 2024, Sustainability Statement dated September 2024, Urban Greening Factor calculation sheet (undated).

Reason: For the avoidance of doubt and in the interest of proper planning.

### ***Pre-start conditions (any works)***

#### **3 Air Quality Monitoring**

No demolition or development shall commence until all the following have been complied with:

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b) A confirmation email should be sent to [airquality@camden.gov.uk](mailto:airquality@camden.gov.uk) no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and

- c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.

Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan.

#### **4 Detailed design drawings and samples**

Notwithstanding the details shown on the approved plans, prior to commencement of relevant works, detailed drawings, including samples of materials as appropriate, in respect of the following for the new front entrance, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

- a) Detailed drawings including plans, coloured elevations and sections of all windows (including jambs, head and cill), external doors, glazing, parapets, and associated elements as appropriate at a scale of 1:20;
- b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site);
- c) Sample bay panel of materials to be provided at a minimum of 1 metre by 1 metre (provided on site / at agreed location for review) to include top corner of typical window with all neighbouring materials and details.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

#### **5 Details of blue/green roofs**

Prior to commencement of the relevant works, full details of the green/blue roofs in the areas indicated on the approved plans shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a) a detailed scheme of installation and maintenance
- b) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used

c) full details of substrate depth, planting species and density.

The green/blue roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

## **6 Wheelchair and accessible rooms**

Prior to commencement of the development hereby approved a plan shall be submitted to the local planning authority for its written approval that confirms the location of a minimum of six wheelchair accessible hotel rooms within the proposed lower ground floor areas (levels 1 and 2). Once approved the rooms shall be retained as wheelchair accessible for as long as the development is in existence.

Reason: To secure appropriate access for disabled people, older people, and others with mobility constraints, in accordance with policies H6 and C6 of the Camden Local Plan 2017.

## **7 Sustainable drainage details**

Prior to commencement, full details of the sustainable drainage system including the approved blue/green roofs and attenuation tanks shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate the approved run off rates approved by the Local Planning Authority.

If necessary, a revised drainage statement, SuDS pro-forma and supporting evidence should be included and the following information should be provided: The proposed SuDS or drainage measures including storage capacities; the proposed surface water discharge rates or volumes; a lifetime maintenance plan, including the owner of the SuDS maintenance.

Systems shall thereafter be installed, retained and maintained in accordance with the approved details.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.

## **8 Air inlet locations**

Prior to commencement, detailed drawings, or samples of materials as appropriate, in respect of the siting and design of ventilation and air inlet grilles for the approved hotel rooms shall be submitted to and approved in writing by the local planning authority. Such grilles shall be located away from main sources of air pollution.

Systems shall thereafter be installed, retained and maintained in accordance with the approved details.



Reason: To protect the quality of life of occupiers of the development in accordance with policy A1 of the London Borough of Camden Local Plan 2017.

**9 Urban greening**

Prior to commencement, a detailed urban greening factor plan showing a development UGF of at least 0.3 shall be submitted to the local planning authority for its written approval. The plan shall be produced in accordance with the Mayor of London's UGF guidance. Once approved the greening measures secured shall thereafter be installed, retained and maintained in accordance with the approved details.

Reason: To protect the quality of life of occupiers of the development in accordance with policy G5 of the London Plan 2021.

***Prior to occupation or use***

**10 Photovoltaic study and energy monitoring**

Prior to first occupation of the development hereby approved, a study shall be undertaken as to the suitability of existing roofs for new photovoltaic cells and associated equipment. Details shall also be provided that demonstrate the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for any each PV system, including safe roof access arrangements, shall be provided, should they be feasible. If agreed cells shall be installed in accordance with the details approved and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

**11 Lighting**

Prior to the first occupation of the development hereby approved a detailed design scheme for the lighting to public areas and access points at the site shall be submitted to the local planning authority for its written approval. The submission shall include details of typology and light spill from such lighting. Once approved the details shall be installed, maintained and retained as such thereafter.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

**12 Cycle parking**

Full details of the proposed minimum of 34 cycle parking spaces shall be provided submitted to and approved by the local planning authority prior to the first occupation of the development hereby approved. The cycle parking shall be designed to meet London Cycling Design Standards requirements.

The cycle storage areas (and associated facilities) shall be provided in their entirety prior to the first occupation of the development, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the Camden Local Plan 2017 and Table 6.3 of the London Plan 2021.

**13 Waste and refuse storage**

The refuse and recycling facility as approved shall be provided prior to the first occupation of the development hereby approved and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

***Compliance conditions***

**14 Non-road mobile machinery (NRMM)**

No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

**15 Contaminated Land**

If, during development, contamination is found to be present at the site then no further development shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this contamination will be dealt with.

Reason: To safeguard future users of this site and the wider environment from risks associated with the contaminated land, in accordance with policies D1 and A1 of the Camden Local Plan 2017.

**16 Noise limits for plant**

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

**17 Anti-vibration isolators for plant**

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

**18 No additional external fixtures**

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

***Building regulations (imposed optional requirements)***

**19 Water use (building control optional requirements)**

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

**24. INFORMATIVES**

<b>1</b>	<i>Construction and demolition works and associated activities at the development, audible beyond the boundary of the site should not be carried out other than between the hours of 07:00 – 19:00 Monday to Friday daily, 08:00 – 13:00 on Saturdays and at no other times, including Sundays and Public/Bank Holidays, unless otherwise agreed with the Environmental Health Officer.</i>
<b>2</b>	<i>21 days prior to the commencement of any site works, all occupiers surrounding the site should be notified in writing of the nature and duration of works to be undertaken. The name and contact details of a person responsible for the site works should be made available for enquiries and complaints for the entire duration of the works and updates of work should be provided regularly. Any complaints should be properly addressed as quickly as possible.</i>
<b>3</b>	<i>Best Practicable Means (BPM) should be used in controlling dust emissions, in accordance with the Supplementary Planning Guidance issued by the GLA 2014 for The Control of Dust and Emissions from Construction and Demolition</i>
<b>4</b>	<i>All waste materials and rubbish associated with demolition and/or construction should be contained on site in appropriate containers which, when full, should be promptly removed to a licensed disposal site.</i>

5	<p><i>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</i></p>
6	<p><i>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</i></p>
7	<p><i>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</i></p>
8	<p><i>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</i></p>

9

**Biodiversity Net Gain (BNG) Informative (1/2):**

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.

Based on the information provided, this will not require the approval of a BGP before development is begun because the planning application was made before 12<sup>th</sup> February 2024.

++ Summary of transitional arrangements and exemptions for biodiversity gain condition

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.
2. The planning permission is retrospective.
3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
4. The permission is exempt because of one or more of the reasons below:
  - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
  - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
  - The application is a Householder Application.
  - It is for development of a "Biodiversity Gain Site".
  - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).

	<p>- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).</p>
<p>10</p>	<p><b>Biodiversity Net Gain (BNG) Informative (2/2):</b></p> <p><u>+ Irreplaceable habitat:</u>  <i>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</i></p> <p><u>++ The effect of section 73(2D) of the Town and Country Planning Act 1990</u>  <i>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</i></p> <p><u>++ Phased development</u>  <i>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</i></p>

# Planning Committee

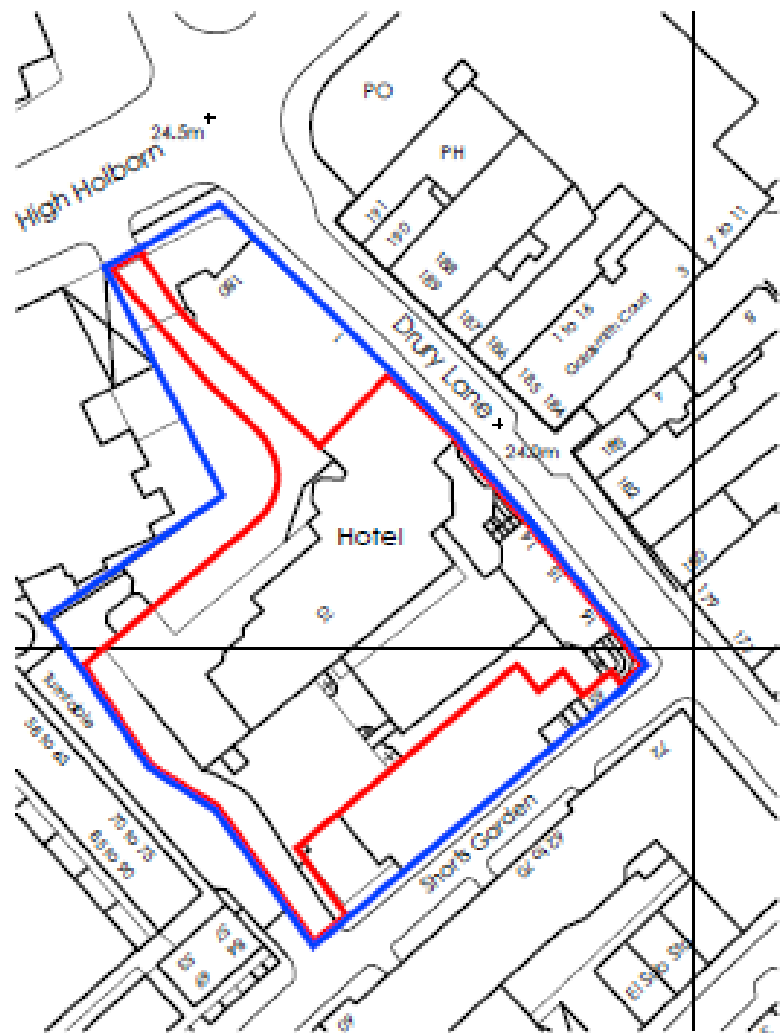
12<sup>th</sup> December 2024

2024/0436/P

**Travelodge Hotel  
10 Drury Lane  
London  
WC2B 5RE**

Erection of a two storey extension forming a new step free entrance at street level; works to car parking area and addition of new floor to create 55 new hotel bedrooms at levels 1&2; infilling of undercroft at level 3 and new flat roof link to extend existing hotel bar/restaurant; and other ancillary works.



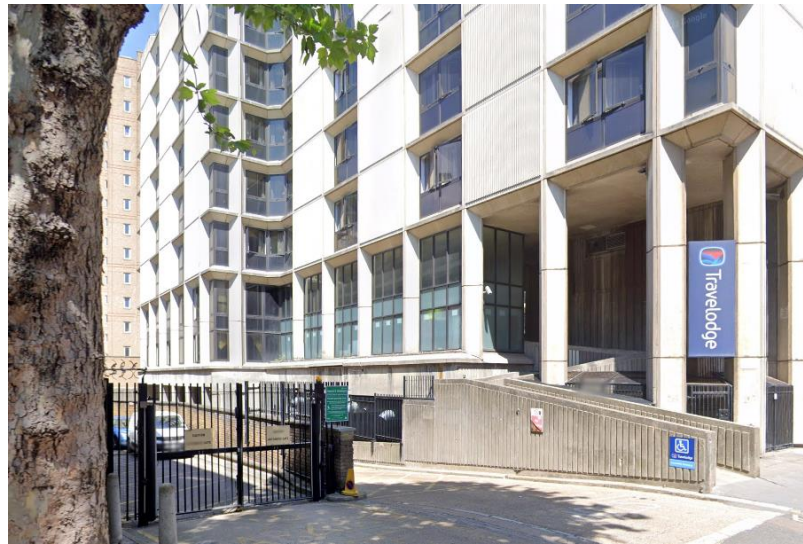


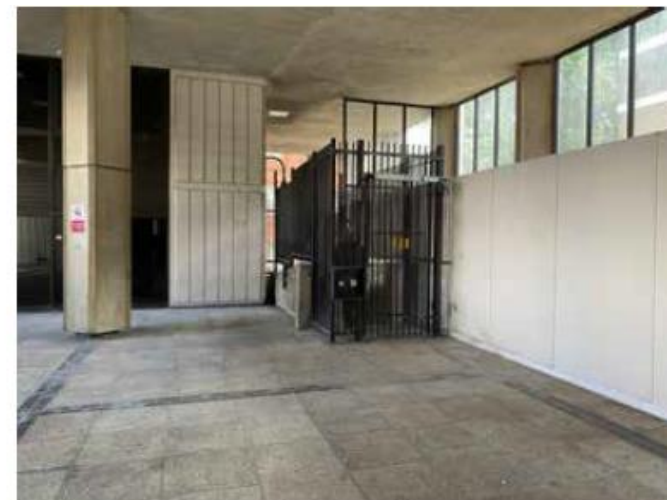
A SITE LOCATION PLAN  
1:1250@A4

— OWNERSHIP BOUNDARY  
— APPLICATION BOUNDARY

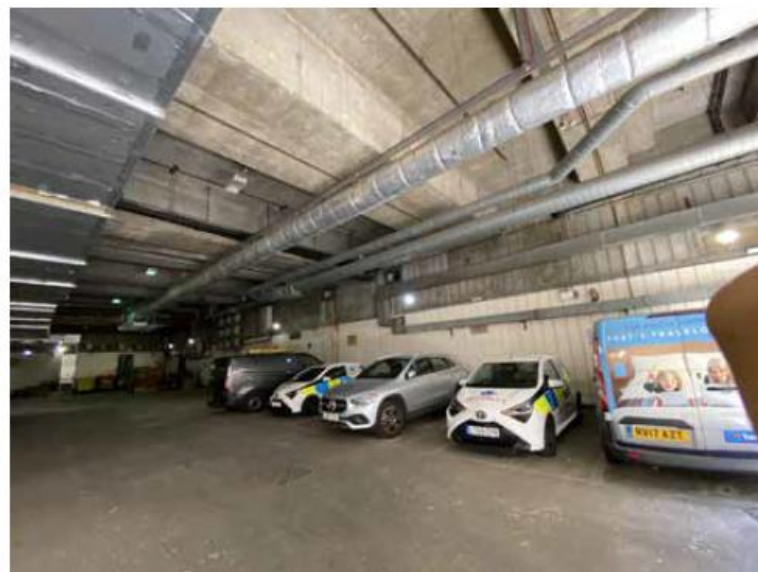


VIEW FROM THE NORTH EAST (EXISTING)

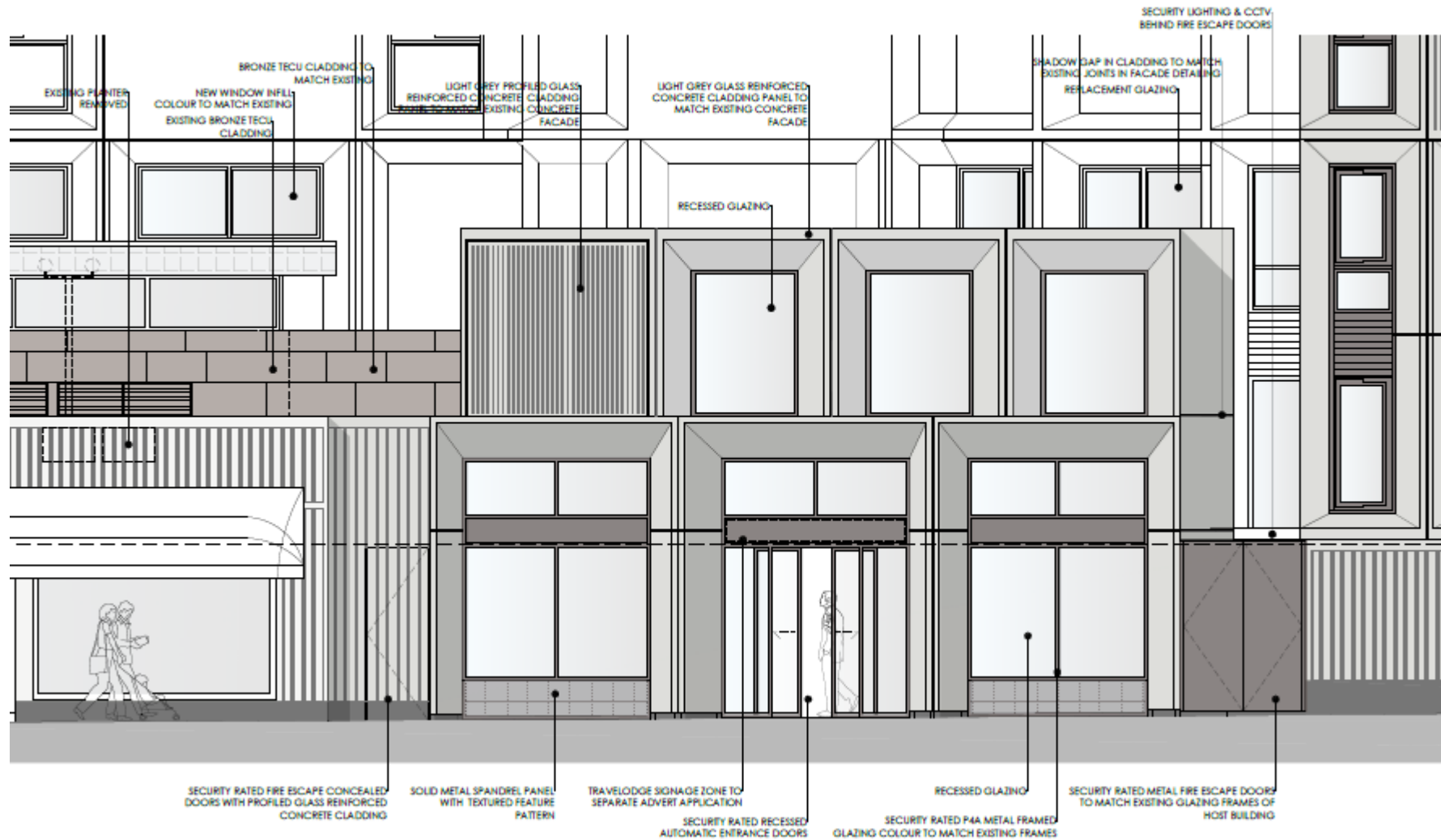


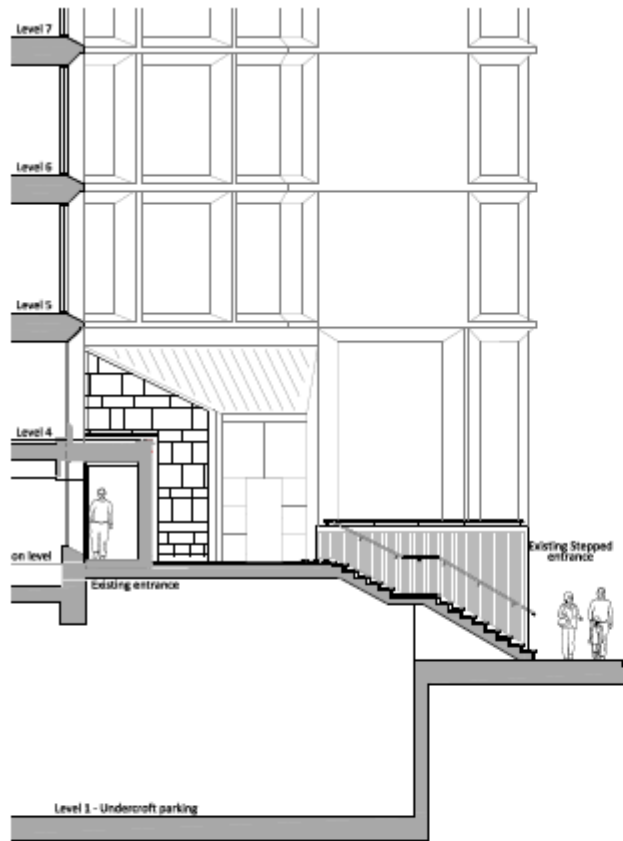


Various views of level 3 under croft

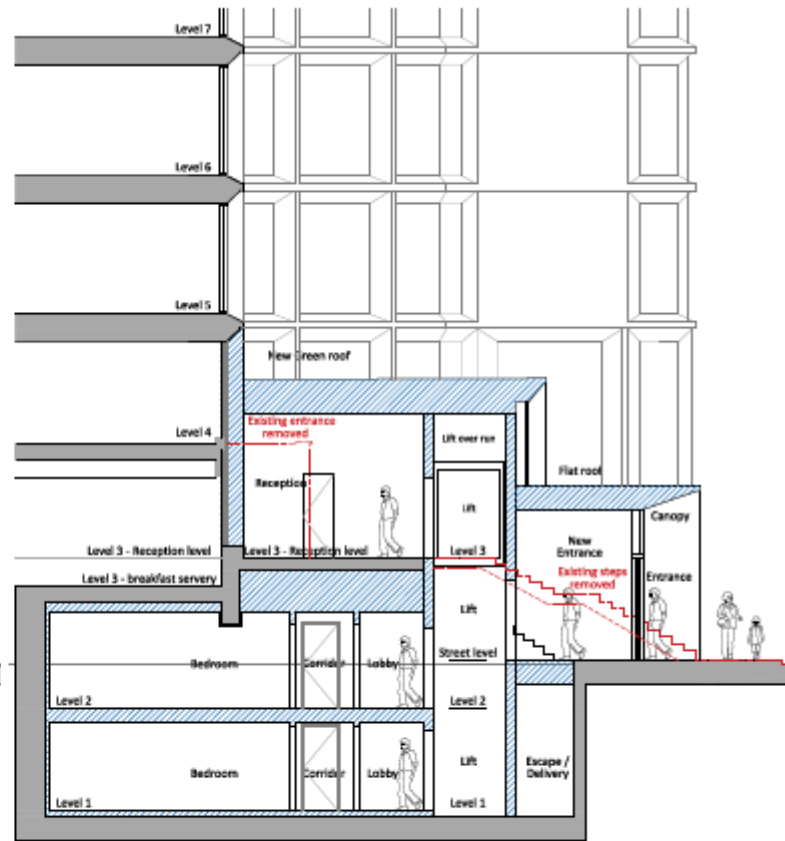


View of car park



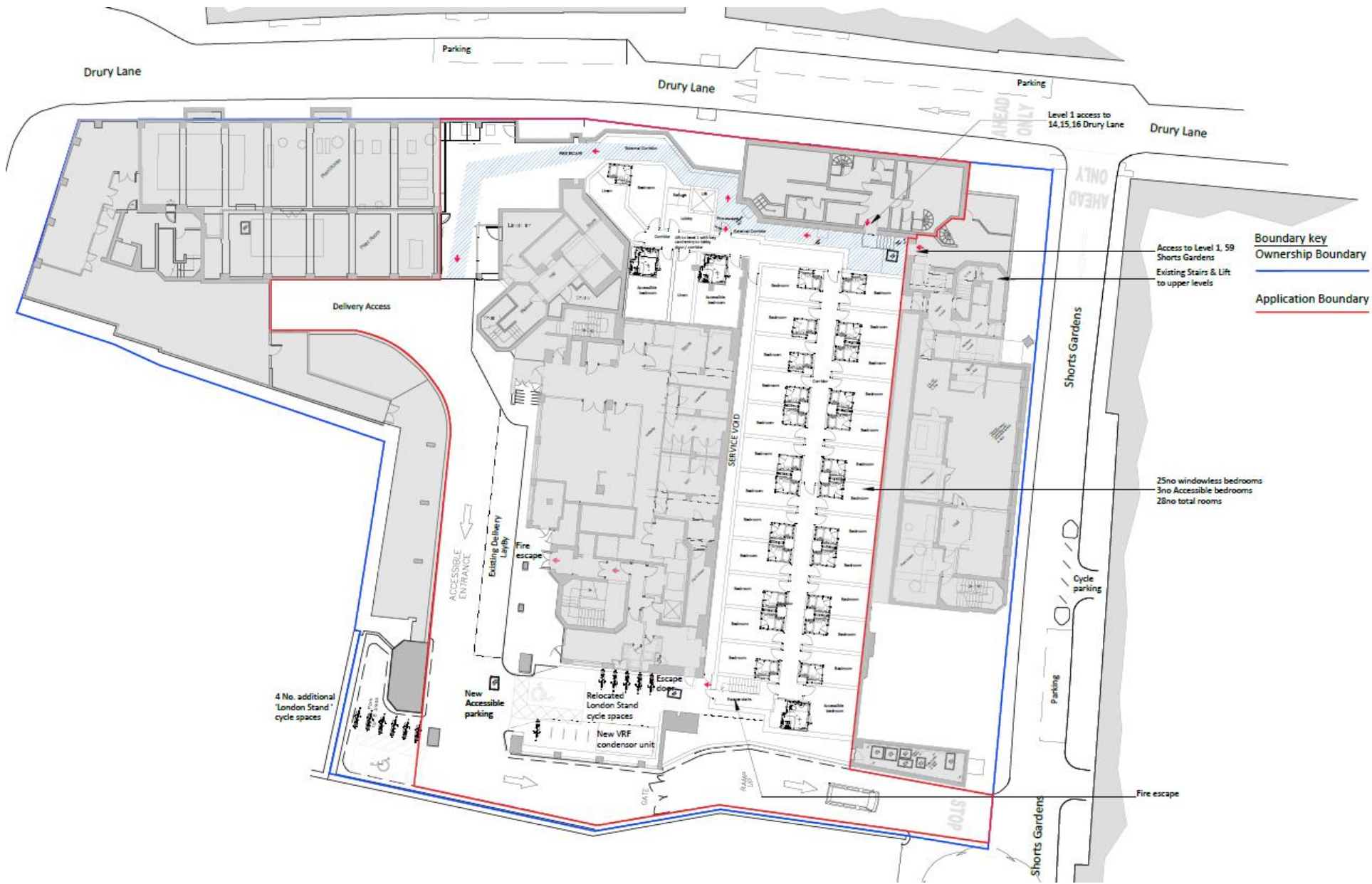


A OUTLINE SECTION A-A - EXISTING  
43 1:100@A2



B PROPOSED OUTLINE SECTION A-A  
43 1:100@A2





**Boundary key**  
 Ownership Boundary  
 Application Boundary

Access to Level 1, 59  
 Shorts Gardens  
 Existing Stairs & Lift  
 to upper levels

25no windowless bedrooms  
 3no Accessible bedrooms  
 28no total rooms

4 No. additional  
 'London Stand'  
 cycle spaces



