

Address:	Four Points Flex Hotel 8-11 Upper Woburn Place London WC1H 0JW		3
Application Number(s):	2025/4768/P	Officer: Christopher Smith	
Ward:	Bloomsbury		
Date Received:	10/11/2025		
Proposal:	Erection of a part two-, part seven-storey side extension, a mansard roof extension and a basement extension and ancillary works, and relocation of existing kitchen extract plant from the flat roof of the ground floor extension to the main roof and installation associated duct work, associated with existing hotel use (Class C1).		
Background Papers, Supporting Documents and Drawing Numbers: Drawings – Existing: AL(00)001, AL(00)009 to AL(00)018 (all Rev. A); AL(00)022, AL(00)026, AL(00)027, AL(00)029; AL(00)030 to AL(00)033 (all Rev. A). Drawings – Proposed (Demolition): AL(10)009 Rev. B, AL(10)010 Rev. B, AL(10)011 to AL(10)018 (all Rev. C). Drawings – Proposed: AL(00)109 Rev. I, AL(00)110 to AL(00)117 (all Rev. K), AL(00)118 Rev. L, AL(00)119 Rev. H; AL(00)200 to AL(00)203; AL(00)300 Rev. L, AL(00)301 Rev. M, AL(00)302 Rev. I, AL(00)303 Rev. H. Supporting Documents: Planning Statement (October 2025) Design and Access Statement (amended, March 2026) Construction Management Plan Proforma (September 2025) Daylight and Sunlight Assessment (October 2025) Delivery and Servicing Strategy (October 2025) Transport Statement (October 2025) Travel Plan (October 2025) Energy/Sustainability Statement (October 2025) BREEAM Pre-Assessment (March 2026) Fire Statement Form (October 2025) Heritage Statement (October 2025) Plant Noise Impact Assessment (October 2025) Arboricultural Impact Assessment & Method Statement Report (June 2026) External Materials Schedule (Rev. A, March 2026) Thermal Comfort Analysis (March 2026)			

RECOMMENDATION SUMMARY:	
Grant conditional planning permission subject to a Section 106 Legal Agreement	
Applicant:	Agent:
Splendid (Euston) Limited C/O Agent	Mariam Malakzi Centro Planning Consultancy 2nd Floor, Abbey House 74-76 St John Street London EC1M 4DT

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class C1	Hotel	3,966	4,921	+955
Total	All uses	3,966	4,921	+955

Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	0	0	0	0
Cycle parking (non-residential)	0	2	0	+2

EXECUTIVE SUMMARY

- i) The application is for an infill side extension of the existing building, plus a further extension to the roof and an extension to the basement, and additional ancillary works, to provide additional visitor accommodation on site. The development would provide an uplift in hotel floorspace of 955sqm.
- ii) The land use on site would not change as the existing building is currently in hotel use (Class C1). The proposed development cannot incorporate housing and as such a financial contribution would be provided in lieu of this on-site housing provision instead, in line with the requirements of policy H2 of the Camden Local Plan, to be secured through Section 106 agreement.
- iii) The proposal would refurbish and extend an existing building that is identified as a positive contributor to the Bloomsbury Conservation Area. Demolition would be kept to a minimum and would generally only occur to improve access or the quality and functionality of the internal accommodation. There would be no harm to the conservation area and as such it is considered the proposed development would preserve the character and appearance of the Bloomsbury Conservation Area and would not negatively impact the setting of other nearby heritage assets.
- iv) The proposed extensions and other associated works would have high-quality architecture as demonstrated through their well-considered composition, detailing and materiality and as such it is considered the proposal would not negatively impact the character and appearance of the host building and the surrounding area.
- v) Objections were raised to the design impact of the proposal by the Bloomsbury CAAC and a local residents and traders group. However, the

design of the extensions, which would infill an existing recess to the side and rear of the site and would involve the addition of a single mansard storey only at roof level, would be subordinate in scale to the existing building and would not create an extended building that appears out of keeping with local character. Materials would also match the host building and, in terms of the mansard, neighbouring buildings. As such, the proposed works are considered acceptable in design terms.

- vi) Objections from the same parties were also raised in terms of the heritage impact of the proposal, given that the site is located within the Bloomsbury Conservation Area and there are Grade II* listed buildings adjacent to the site on Woburn Walk. However, the increased massing would not affect the buildings on Woburn Walk due to the separation between the buildings and the already distinct change in character and building typology between those listed buildings and the hotel on the host site. The subordinate scale and massing of the proposals and the use of materials to match the existing building and area also means the conservation area would not be adversely affected. Therefore, it is considered that there would be no harm to local heritage assets arising from this proposal.
- vii) The proposed development has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook and privacy. The proposed end uses would also not create significant levels of additional noise disturbance.
- viii) Objections were raised to the amenity impact of the proposal, particularly in terms of noise and disturbance impacts, by a local residents and traders group. Construction works would be managed through planning obligations secured through a section 106 legal agreement and hotel plant equipment would be relocated to roof level. The proposal would replace some existing outdoor hotel amenity areas with new buildings. Therefore, it is considered that the proposal would be acceptable in terms of its noise and disturbance impact.
- ix) The proposed development would be car-free and would support sustainable transport methodologies through the provision of additional secure cycle parking on-site plus financial contributions in support of public realm and other local transport improvements, to be secured through Section 106 legal agreement.
- x) Objections were raised to the transport impact of the proposal, particularly in terms of impacts on access arrangements to Woburn Walk, by a local residents and traders group. However, Woburn Walk will retain pedestrian-only access and will not be used for construction vehicles. Ongoing access to Woburn Walk would be ensured through the construction management plan secured through a section 106 legal agreement.
- xi) The proposed development minimises energy demand through exceeding the relevant carbon reduction policy targets for commercial development and achieving BREEAM 'excellent' certification through the provision of air

source heat pumps, PV panels, a green roof and the use of sustainable building materials.

- xii) Construction works necessary for this proposed development are required to adhere to a detailed construction management plan, supported by appropriate financial contributions, to be secured through Section 106 legal agreement, which would protect the amenity of nearby residents and minimise the impact of the development on the local public realm.
- xiii) The scheme complies with the development plan as a whole and therefore is recommended for approval, subject to conditions and a Section 106 legal agreement.

OFFICER REPORT

Reason for Referral to Committee:

Minor development where this involves the construction of upwards of 500 sq. metres of non-residential floorspace [Clause 3(ii)], and; subject to the completion of a legal agreement that secures non-standard financial contributions of more than £50,000 [Clause 3(iv)].

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Central London Area
Conservation Area	Bloomsbury
PTAL (Public transport accessibility)	6B (best)
Crossrail	Crossrail 2 area
Protected Vistas (from the London View Management Framework)	- Primrose Hill summit to St Paul's Cathedral (4A.1) - Greenwich Park Wolfe statue to St Paul's Cathedral (5A.2) - Blackheath Point to St Paul's Cathedral (6A.1)
Underground development constraints	- Subterranean (groundwater) flow - Slope stability
Article 4 Basements	All basement works require planning permission
Contaminated Sites Potential	Former hospital in the area

Table 1 - Site designations and constraints

Description

1.2 The site is located on the north-eastern side of Upper Woburn Place, on the southern side of the junction with Woburn Walk. The site area is approximately 0.08 hectares (800sqm).



Figure 1 – Site location

- 1.3 The host property is a part seven, part eight storey building plus basement. The site is currently occupied by a hotel that has been recently refurbished.
- 1.4 The surrounding area includes buildings that range from three to eight storeys, encompassing a mix of uses including commercial, hotel, retail, restaurants and bars, and residential use. The larger buildings typically front onto Upper Woburn Place with lower scale properties, such as the three storey buildings on Woburn Walk, located on side streets.



Image 1 – Existing site from Upper Woburn Place

- 1.5 The site is located within the Bloomsbury Conservation Area. The host property is not listed, although it is considered a positive contributor to the conservation area.

- 1.6 There are several listed buildings in the surrounding area including the Grade II listed BMA House immediately to the south, Grade II* listed properties on Woburn Walk immediately to the east and the Grade I listed Church of St. Pancras to the north.



Figure 2 – Map of local heritage designations

- 1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 6B (Best) and is close to several London Underground stations including Euston Station, Euston Square and Russell Square, as well as a range of bus services.

2. THE PROPOSAL

- 2.1 The proposal is for a part two, part seven storey side extension, a mansard roof extension and a basement extension, the relocation of existing kitchen extract plant to the main roof facilitated by the installation of associated duct work, and other ancillary works, which are all associated with existing hotel use (Class C1).
- 2.2 The part two/part seven storey extension is proposed on the northern side of the building extending from the ground floor up to the eighth floor (inclusive). The ground and first floors would appear as a side extension to the existing stone-clad lower part of the existing building and would provide new secondary point of arrival facilities for the hotel activities. From the second floor upwards, the extension would have a brick finish and would be stepped in from the elevations below it. Additional hotel accommodation and plant storage would also be provided within a proposed new mansard roof to form a ninth storey.

- 2.3 The basement extension would infill an existing rear open courtyard area at lower ground level. There will be no excavation. It would be finished with a green roof and rooflights. An extended terrace for occupiers of the hotel would be created adjacent to the green roof at ground floor level, within the recessed part of the building behind its existing eight storey rear projection.



Image 2 – Development from the north on Upper Woburn Place



Image 3 – Development from the east on Woburn Walk

- 2.4 The proposal would also provide a new roof-level location for the kitchen extract equipment which is currently located on a rear first floor terrace, for which permission was originally granted in April 2025 (Ref. 2025/0886/P), and which was not constructed in accordance with the approved plans. Following an enforcement investigation a separate application has been submitted to regularise this equipment in its current location (Ref. 2026/0792/P) which remains under assessment. Notwithstanding that recent application, this proposal would include an alternative long-term solution for the kitchen plant at roof level.
- 2.5 The proposals were amended in January 2026 to include a brick pier enclosure on the southern side of the building's outrigger which would accommodate re-routed kitchen extract ductwork and enable the extract equipment to be located on the new roof.

3. RELEVANT HISTORY

The site

- 3.1 The site has an extensive planning history related to its ongoing use as visitor accommodation, including advertisement consent, telecommunications and approval of details applications.
- 3.2 Applications for planning permission that have been decided since 2014 are reported below.
- 3.3 2014/4201/P. Installation of new shopfront to the rear section of the building to Woburn Walk elevation with associated entrance, external decking, access stair and railings for use by the ancillary restaurant following the conversion of the existing conference room in association with the existing hotel use and the display of 3 x non-illuminated advertisements to the front and side elevations. Permission Granted 01-12-2014.
- 3.4 2023/2778/P. The replacement of single glazed windows with double glazed units across all elevations; replacement roof plant including installation of PV panels and associated works. Permission Granted 04-10-2023.
- 3.5 2023/3680/P. Erection of a single storey extension, erection of an electrical substation, following the demolition of the existing substation & enclosure installation of new front entrance, removal of a goods lift and enclosure from the front of the building, all on Woburn Walk at ground floor level, replacement of the existing goods platform lift to the front elevation and amendments to the rear terrace (south) at basement level and erection of an open-sided canopy. Permission Granted 13-03-2024.
- 3.6 2024/2183/P. Variation of condition 2 (approved drawings) of planning permission 2023/3680/P dated 13/03/2024 for the Erection of a single storey extension, erection of an electrical substation, following the demolition of the

existing substation & enclosure installation of new front entrance, removal of a goods lift and enclosure from the front of the building, all on Woburn Walk at ground floor level, replacement of the existing goods platform lift to the front elevation and amendments to the rear terrace (south) at basement level and erection of an open-sided canopy.; namely, external changes to the replacement gates, changes to doors and windows, revised staircase design, revised canopy design and inclusion of a security gate) and a revised platform lift. Permission Granted 19-11-2024.

- 3.7 2024/2540/P. Details to discharge Condition 3 (materials) of planning reference 2023/3680/P dated 13/03/2024 for the erection of a single storey extension, erection of an electrical substation, following the demolition of the existing substation & enclosure installation of new front entrance, removal of a goods lift and enclosure from the front of the building, all on Woburn Walk at ground floor level, replacement of the existing goods platform lift to the front elevation and amendments to the rear terrace (south) at basement level and erection of an open-sided canopy. Permission Granted 30-09-2024.
- 3.8 2024/3948/P. Retention of the existing air source heat pumps and kitchen extract plant, and the erection of acoustic screening on the electrical substation and kitchen roofs to replace the existing louvre screens. Permission Refused and Warning of Enforcement Action to be Taken 05-02-2025.
- 3.9 2025/0886/P. Relocation of the existing/temporary air source heat pumps and associated structure to rear external terrace, and the erection of acoustic louvred enclosure. Permission Granted 25-04-2025.
- 3.10 2026/0792/P. Retrospective planning permission for the Kitchen Extract Plant on the flat roof above the ground-floor kitchen, and acoustic screening jackets added to the Air Source Heat Pumps in the basement courtyard. Currently under assessment.
- Application submitted in response to enforcement case ref. EN25/0768 regarding noise disturbance, design and siting of kitchen plant which received permission in April 2025 under application ref. 2025/0886/P but has not been constructed in accordance with the approved plans.

4. CONSULTATION

Statutory consultees

Thames Water

- 4.1 No objections.

Transport for London

- 4.2 No objection in principle. Requires further information regarding the proposed construction traffic arrangements and their impact on the Transport for London Road Network (TLRN).

Officer response: TLRN impact can be managed through the construction management plan, which will be secured through s106 legal agreement. See Section 15 'Transport' below for a detailed assessment.

Transport for London (Crossrail 2)

- 4.3 No objections.

Local groups

Bloomsbury CAAC

- 4.4 Objection covering the following issue(s):

Design & Heritage

- Significant increase in scale and bulk from Woburn Walk.
- Poor design of mansard and rear extension.
- Increased overbearingness and 'canyon effect'.
- Harm caused to the conservation area and setting of listed buildings.

Other matters

- Drawings show insufficient local context.

Officer response: The appearance of the extensions is considered appropriate by the Council's Design and Conservation Officers. See Section 8 'Design and Heritage' below for a detailed assessment. The design of the extensions, which would infill an existing recess to the side and rear of the site and would involve the addition of a single mansard storey only at roof level, would be subordinate in scale to the existing building and would not create an extended building that appears out of keeping with local character. Materials would also match the host building and, in terms of the mansard, neighbouring buildings. The submitted drawings are considered suitable and of sufficient quality for an appropriate planning assessment to be made.

Residents and Traders of Woburn Walk and Duke's Road

- 4.5 Objection covering the following issue(s):

Design & Heritage

- Significant increase in scale and bulk from Woburn Walk.
- Poor design of mansard and rear extension.
- Increased overbearingness and 'canyon effect'.
- Harm caused to the conservation area and setting of listed buildings.

Officer response: The appearance of the hotel extension is considered appropriate by the Council's Design and Conservation Officers. See Section 8 'Design and Heritage' below for a detailed assessment. The design of the extensions, which would infill an existing recess to the side and rear of the site and would involve the addition of a single mansard storey only at roof level, would be subordinate in scale to the existing building and would not create an extended building that appears out of keeping with local character. Materials would also match the host building and, in terms of the mansard, neighbouring buildings.

Local Amenity

- Noise and air pollution from construction works
- Ongoing noise and air pollution from plant equipment
- Increased noise from use of courtyard
- Increased security risks from siting of construction hoardings

Officer response: Some disturbance from construction works is inevitable in a highly urbanised environment. However, proposed works will be closely managed through planning obligations as described in Section 14 'Transport' below. Plant and kitchen extract equipment would be relocated to the roof as part of this application with noise, vibrations and emissions limited by condition. The existing courtyard is proposed to be filled-in and not extended, which should eradicate noise from patrons in this area. The Council will request that local safety measures are detailed within the construction management plan that will be secured through planning obligations in the event that this application is granted permission.

Transport

- Reduced access to Woburn Walk for homes and businesses

Officer response: The construction management proforma submitted with the application states that Woburn Walk will retain pedestrian-only access and will not be used for construction vehicles. The Council will ensure access to Woburn Walk is retained through the construction management plan that will be secured through planning obligations in the event that this application is granted permission.

Adjoining occupiers

- 4.6 Three site notices were displayed on local streets including on Upper Woburn Place, Woburn Walk and Burton Street. The notices were displayed on 12th November 2025 until 6th December 2025. The application was also advertised in the local newspaper on 20th November 2025 (expiring 14th December 2025).
- 4.7 Following the submission of amended plans which moved the kitchen extract equipment up to the roof a public re-consultation was activated with site

notices displayed on 19th February 2026 until 14th March 2026 and a re-advertisement posted in the local newspaper on 19th February 2026 (expiring 15th March 2026).

- 4.8 No objections have been received from adjoining occupiers (other than those included within the residents' and traders' group referenced above).

5. POLICY

National and regional policy and guidance

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

[Draft National Planning Policy Framework 2025 \(Draft NPPF\)](#)

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

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

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG3 Creating a healthy city](#)

[GG5 Growing a good economy](#)

[Policy SD4 The Central Activities Zone \(CAZ\)](#)

[Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

[Policy D3 Optimising site capacity through the design-led approach](#)

[Policy D4 Delivering good design](#)

[Policy D5 Inclusive design](#)

[Policy D10 Basement development](#)

[Policy D12 Fire safety](#)

[Policy D14 Noise](#)

[Policy E10 Visitor infrastructure](#)

[Policy E11 Skills and opportunities for all](#)

[Policy HC1 Heritage conservation and growth](#)

[Policy HC3 Strategic and Local Views](#)

[Policy HC4 London View Management Framework](#)

[Policy G1 Green infrastructure](#)

[Policy G5 Urban greening](#)

[Policy G6 Biodiversity and access to nature](#)

[Policy SI 1 Improving air quality](#)

[Policy SI 2 Minimising greenhouse gas emissions](#)

[Policy SI 3 Energy infrastructure](#)

[Policy SI 4 Managing heat risk](#)

[Policy SI 5 Water infrastructure](#)

[Policy SI 12 Flood risk management](#)

[Policy SI 13 Sustainable drainage](#)

[Policy T1 Strategic approach to transport](#)

[Policy T2 Healthy Streets](#)

[Policy T3 Transport capacity, connectivity and safeguarding](#)

[Policy T4 Assessing and mitigating transport impacts](#)

[Policy T5 Cycling](#)

[Policy T6 Car parking](#)

[Policy T7 Deliveries, servicing and construction](#)
[Policy T9 Funding transport infrastructure through planning](#)
[Policy DF1 Delivery of the Plan and Planning Obligations](#)
[Policy M1 Monitoring](#)

London Plan Guidance (LPG)

[Accessible London SPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[London View Management Framework SPG](#)
[Urban greening factor LPG \(February 2023\)](#)
[Air quality positive LPG](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)
[Policy C5 Safety and security](#)
[Policy C6 Access for all](#)
[Policy E1 Economic development](#)
[Policy E2 Employment premises and sites](#)
[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 CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[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 CPG - March 2019](#)
[Air Quality - January 2021](#)
[Amenity - January 2021](#)
[Basements - January 2021](#)
[Biodiversity CPG - March 2018](#)

[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Employment sites and business premises - January 2021](#)
[Energy efficiency and adaptation - January 2021](#)
[Transport - January 2021](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

Bloomsbury Conservation Area appraisal and management strategy (2011).

Proposed Submission Draft Camden Local Plan (DCLP)

- 5.1 The [Proposed Submission Draft Camden Local Plan](#) was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The examination of the draft Local Plan is currently ongoing, and hearings were held from 19 May 2026 to 11 June 2026.
- 5.2 Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.
- 5.3 The Proposed Submission Draft Camden Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

Draft London Plan

- 5.4 The draft London Plan was published on 16th July 2026 for consultation. Its weight at this time ahead of any responses to consultation will be extremely limited. None of its draft policies are considered relevant to this application to the extent that they would affect the assessment undertaken below.

6. ASSESSMENT

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

7.	Land use
8.	Design and heritage
9.	Impact on neighbouring amenity
10.	Sustainability and energy
11.	Trees, greening and biodiversity
12.	Air quality
13.	Land contamination
14.	Flood risk and drainage
15.	Transport
16.	Employment and training opportunities
17.	Community infrastructure levy (CIL)
18.	Conclusion
19.	Recommendation
20.	Legal comments
21.	Conditions
22.	Informatives

7. LAND USE

- 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.

Proposed extension of existing hotel uses

- 7.3 London Plan Policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure that it can meet the accommodation demands of tourists who want to visit the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.

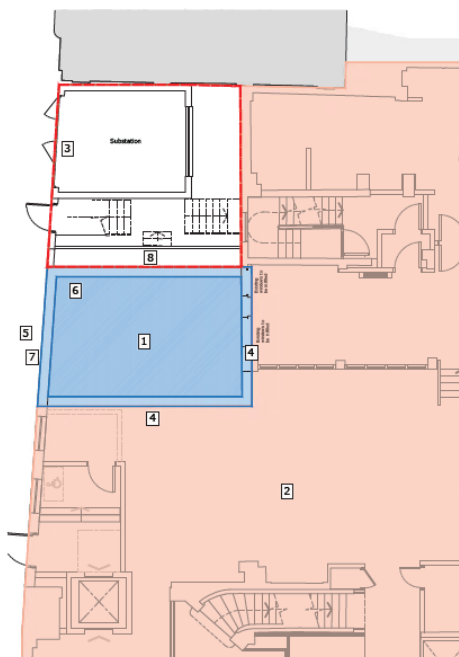
- 7.4 Policy E3 of the Camden Local Plan recognises the important of the visitor economy in Camden. It states that the Council will support tourism development and visitor accommodation and confirms that large-scale tourism development and visitor accommodation are expected in Central London. The policy also states that all tourism development and visitor accommodation should be easily reached by public transport and should not harm local character or residential amenity.
- 7.5 The site is located within a part of the Central London area with the highest possible transport accessibility (PTAL of 6b). 955sqm of new hotel floorspace would be created. The proposed development would utilise the site more effectively, increasing the density of the existing visitor accommodation activities on it and providing an additional 39 bedrooms. The applicant has also stated that the number of jobs on site would increase by two.
- 7.6 As such, the increased provision of hotel space on the existing site is supported in principle in land use terms.

Non-provision of self-contained housing

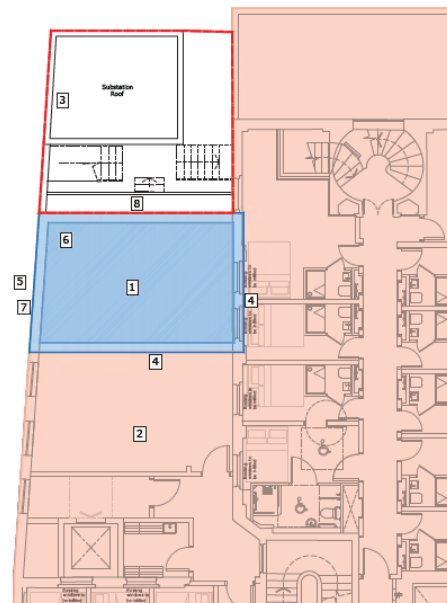
- 7.7 Policy H2 of the Local Plan states that where new non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses. The policy goes on to state that, in the Central London Area (CLA), development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing, subject to considerations relating to the character of the area, development and site, site-specific constraints, compatibility with existing and proposed uses, and other relevant matters.
- 7.8 Policy H2 also states that the required amount of housing should be provided on-site, unless this is not practical or the housing could be more appropriately provided elsewhere, including on alternative sites nearby. The policy notes that developments where less than 1,000sqm of new floor space is proposed may not be suitable for on-site self-contained housing. In exceptional circumstances the Council will accept an appropriate payment in lieu of on-site self-contained housing.
- 7.9 The assessment process for Policy H2 therefore utilises two stages: parts (a)-(e) of the policy, relating to the character of the area, development and site, site-specific constraints, compatibility with existing and proposed uses, and other relevant matters; and parts (f) to (j) of the policy which assesses practical matters such as safety/security, available floorspace, land use mix efficiency, development economics and other potentially applicable alternative approaches.
- 7.10 The proposed development consists of an infill side rear extension, an infill extension at basement level, and a mansard roof extension and would

increase the amount of non-residential floor space on site by 955sqm which results in a requirement for 477.5sqm of self-contained housing.

- 7.11 The site is very constrained given it is sited in a highly urbanised Central London area and is covered entirely by an existing hotel and associated activities. The heritage considerations of the site, given it is a positive contributor to the conservation area it is located within, and given the site is also located near to listed buildings, place significant limits on the size and layout of potential extension, as does the proximity of residential uses nearby.
- 7.12 It is considered that there is some potential scope for self-contained residential accommodation on this site in principle given such a use is reasonably compatible with visitor accommodation and also given that there is some potential space available above ground floor level on parts of the existing site, such as the side return area to the rear of the building and at roof level where parts of this development proposal would be located. As such, regarding the first part of policy H2, it is considered possible to locate self-contained housing on site.
- 7.13 In terms of the second part of policy H2 (Parts f-j), parts (f) and (g) require any self-contained housing to add to community safety via an active street frontage and to provide sufficient floorspace for the new accommodation.
- 7.14 These steps could be met by providing residential accommodation accessed from the street on Woburn Walk, as shown on the figure below (proposed location of a new home over ground and first floors is shown in blue), or through providing residential accommodation at roof level and incorporating a new residential core at ground level.



Proposed Scheme showing residential option (Ground Floor Level)



Proposed Scheme showing residential option (First Floor Level)

Figure 3 – Plan showing analysis of potential siting of a potential new home (shaded in blue) on the site over ground and first floor levels with access onto Woburn Walk to the left

- 7.15 However, in respect of parts (h) and (i) of the policy, which requires the combined mix of the uses to constitute an efficient use of land and development economics, some problems arise which relate principally to the requirement for two separate access cores (one for each of the self-contained residential and hotel uses) if residential accommodation was to be provided on site alongside the proposed hotel extension.
- 7.16 The applicant has submitted an analysis of the challenges for self-contained housing which is summarised within page 33 of their *Design and Access Statement*.
- 7.17 Within the envelope of the side and rear elements of the proposed extension only the lift core and one additional room can be accommodated at each level above first floor. The scale of the extension is considered not to have significant scope for increase on design and heritage grounds. This limited amount of space per floor provides no viable opportunity to incorporate an additional separate core and circulation space that would be required if residential accommodation was also to be provided, whether that be on the extended floors to the rear of the hotel or within any part of the proposed roof level mansard upward extension.
- 7.18 The ongoing operational nature of the hotel, and the fact this has been recently refurbished, also means that retrofitting a residential core elsewhere on site is also very difficult to achieve without another costly comprehensive refurbishment of the hotel floorspace. As such, for practical and financial reasons the proposed new floors above first floor level, including the new mansard roof area, can be ruled out as locations for potential new housing.
- 7.19 Focussing thereafter on the ground and first floors, the scope of potential residential accommodation is further limited by the existing substation and fire escape at ground level for which there are no alternative locations. See figure above which shows the substation and fire escape areas (outlined in red) as well as identifying the only possible potential location for a two-storey dwelling which would be fronting onto Woburn Walk (in blue).
- 7.20 A two storey dwelling in this area is technically feasible, however it would not be of an appropriate quality as it would be single aspect (windows could not be installed in any elevation other than to the north, due to the siting of the existing hotel and party wall restrictions) and consequent low daylighting. It would also result in the loss of two guestrooms at first floor level which would impact negatively on development viability.

Non-provision of self-contained housing - summary

- 7.21 The provision of a single new core to reach the proposed roof accommodation is a main justification for the scale and size of the development as proposed. It is considered that an extension with the additional scale needed to incorporate a further core for residential access would not be acceptable in design or heritage terms.
- 7.22 The inefficiency of the uses on site that would be caused by the additional core and circulation space required by a mixed hotel and residential use on site is therefore another reason why such a mix is not suitable in these circumstances. The applicant has also stated that any further loss of internal visitor accommodation floorspace for a residential core or circulation space would make this development proposal unviable in commercial terms.
- 7.23 As such, it is considered that on-site self-contained housing is not suitable in the specific circumstances relating to this development proposal and therefore residential accommodation is not required on-site in accordance with part (h) of Policy H2.
- 7.24 The applicant does not own any other sites in Camden. The highly developed nature of the urban environment locally plus the high cost and low availability of land also means that there are no other appropriate developable sites immediately available nearby where self-contained housing could be reasonably provided instead.
- 7.25 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 £716,250 (955sqm x 50% x £1,500) and shall be secured through S106 legal agreement.

8. DESIGN AND HERITAGE

- 8.1 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 - summary

- 8.2 The host property is an existing part seven, part eight storey hotel building plus basement.
- 8.3 The built environment in the surrounding area ranges between three to eight storeys, encompassing a mix of uses including commercial, hotel, retail,

restaurants and bars, and residential uses. The larger buildings typically front onto Upper Woburn Place with lower scale properties, such as the three storey buildings on Woburn Walk, on site streets.



Image 4 – View of existing site from western side of Upper Woburn Road

- 8.4 The front of the building faces onto Upper Woburn Walk, a busy thoroughfare, and the northern side is onto Woburn Walk, a more tranquil tree-planted, pedestrianised street with three storey early 19th century properties with commercial units at ground floor which are grade II* listed fronting onto it.



Image 5 – View of site from the east along Woburn Walk

Designated and non-designated heritage assets

- 8.5 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.
- 8.6 The application site is located within the Bloomsbury Conservation Area Sub Area 6 (Bloomsbury Square/Russell Square/Tavistock Square).
- 8.7 Adjoining the site to the south-east is the Grade II listed British Medical Association House. Opposite the site to the west (across Upper Woburn Walk) is the Grade II listed former Cora Hotel (now Euston Plaza Hotel). To the rear of the site (east) are the Grade II* properties on Woburn Walk including nos. 4-18 (even, including their respective 'A' properties) on the south side and nos. 1-9 (odd, including 9A) on the north side. The Grade II* property at no.16 Duke's Road also adjoins the northern side of Woburn Walk.

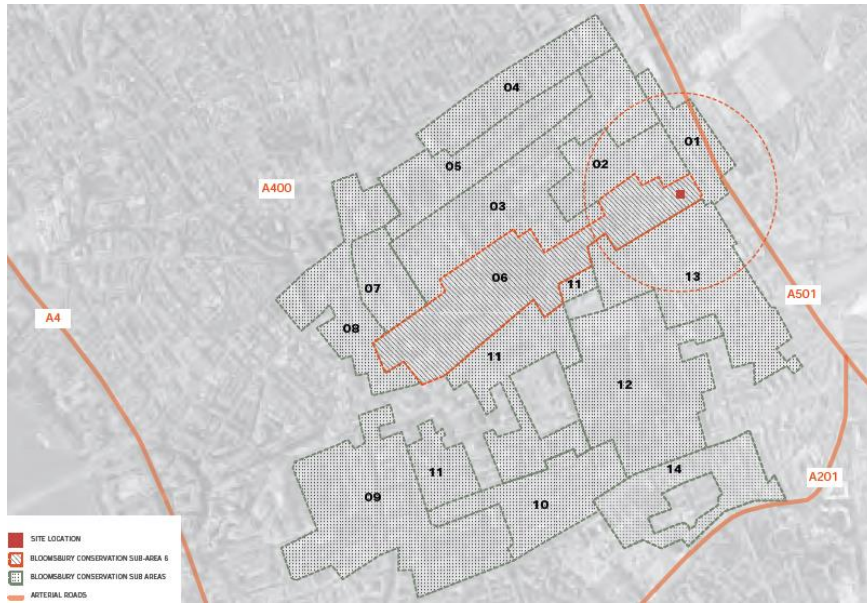


Figure 4 – Location of site within Bloomsbury Conservation Area (Sub Area 6 outlined in red)

- 8.8 The Grade I listed Church of St Pancras is located a short walk to the north of the site. The lamp posts on Woburn Walk are also Grade II listed.

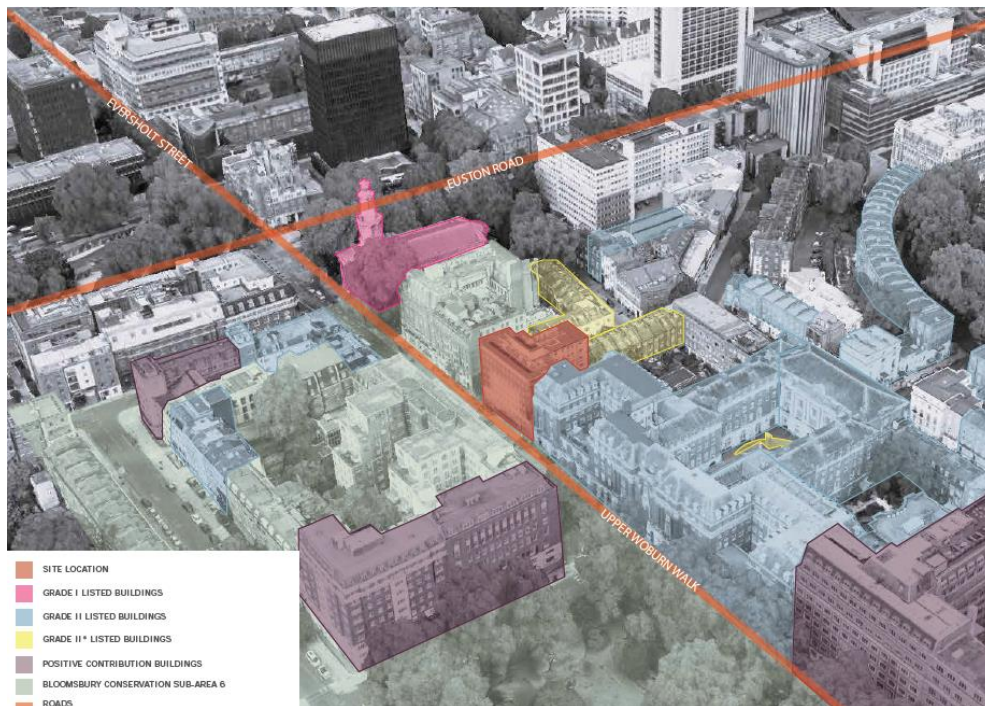


Figure 5 – Map of local heritage designations

- 8.9 The impact of the proposed development on these key heritage assets is discussed in the sections below.

Heritage asset impact – no harm

- 8.10 The host building has been identified as a building that makes a positive contribution to the Bloomsbury Conservation Area. The building replaced a

group of terraced houses and was constructed as an eight-storey hotel between 1923-25, although it didn't open until 1940. The front elevation is of rusticated stone from ground to fifth floors, with red brick above. The rear elevation, visible from Woburn Walk is constructed from yellow stock bricks. The architecture of the building has a strong relationship with surrounding buildings, particularly the Endsleigh Court building (unlisted, positive contributor) directly opposite.

- 8.11 The proposed mansard roof would be of a single storey and would cover the entirety of the roof including the proposed side/rear extension. The principle of the additional height is supported as it would not significantly change the overall scale and height of the building as viewed from Upper Woburn Place. This is demonstrated in the image below, which shows the amended building on the right.



Image 6 – Front of host building as existing (left) and proposed (right)

- 8.12 The impact of the additional height on Woburn Walk would be set away from the Grade II* listed buildings to ensure the increased massing does not affect their setting.
- 8.13 Views from Tavistock Square Gardens have also been interrogated and demonstrate the proposed additional roof massing is in keeping with the overall scale of the area. The additional height is acceptable in terms of the street scene, see Figure 6 below. The floor to ceiling height of the roof extension is greater than the floors below which creates a slightly top-heavy appearance. However, this height is necessary to enable the roof to provide good quality additional hotel accommodation and is considered not to be excessively visually prominent in the context of the amended building overall.
- 8.14 The roof extension materiality would appear in keeping with the conservation area by using appropriate slate roof tiles for its external finish. Within the immediate area roofs are generally slate clad creating a specific aesthetic that this proposal would accord with.

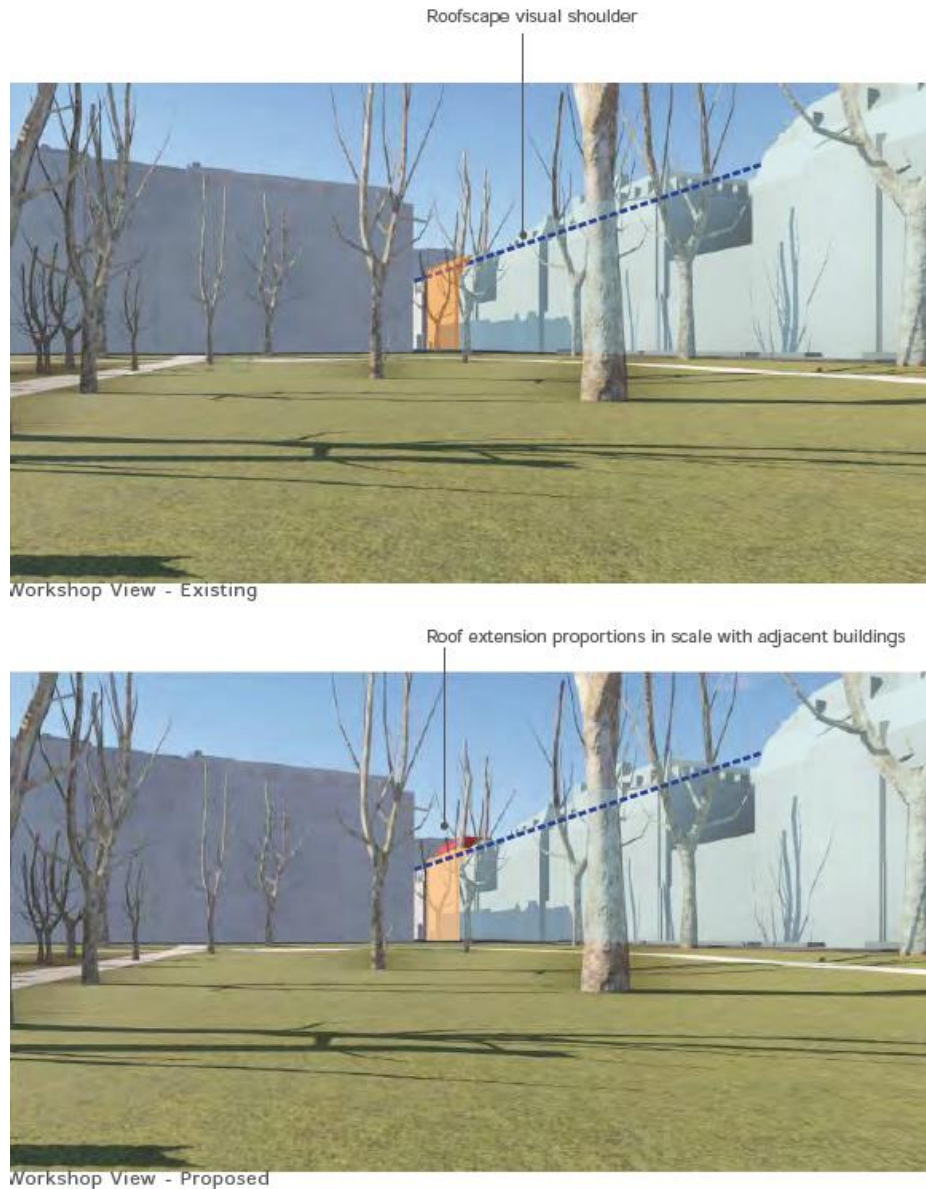


Figure 6 – Existing and proposed massing of building from Tavistock Square Gardens

- 8.15 The two-storey side/rear extension has been designed with a step-in across all but its lowest two floors. These steps would be a maximum of 1.05 metres (minimum 0.5 metres) on the northern side and 5.5 metres on the rear (eastern) side. This proposed stepped massing allied to the use of high-quality materials that match the existing hotel ensures that the extension would not be excessively visually prominent on Woburn Walk. Therefore, it would not harm the conservation area, nor would it affect the setting of the listed structures nearby on that street.
- 8.16 The ground and first floor two-storey element of the side/rear extension create a clear building line on the pavement edge which improves the coherence of this part of the building and the street. The internal building

levels affect the position of the windows and the door to the northern side of the extension, and whilst this means the composition of the façade in this area is not ideal from a heritage perspective, it is considered that a reasonable and acceptable solution has been achieved that does not harm any local heritage features.



Image 7 – Proposed rear and roof extensions of building from Woburn Walk

- 8.17 Other elements of the proposal, specifically those at basement level and to the south of the host building's rear outrigger feature, would not be visible from the wider surrounding area and therefore would not impact on local heritage.
- 8.18 Details of exact finishing materials and sample brick panels would be secured through condition (no. 3) to ensure that the final finish of the building is of a very high quality consistent with a location of such historic character.
- 8.19 The Council's Conservation Officer has reviewed this application and considers that there is no heritage harm to local heritage assets.
- 8.20 Overall, it is considered that there would be no heritage harm to the conservation area or nearby listed buildings, nor to their setting, as the result of the proposed development.



Figure 7 – Proposed north elevation showing ground & first floor consistent with that of the existing building

Design impact

- 8.21 As well as respecting local heritage and providing a well-considered holistic design a key driver of the proposed redevelopment is to maintain operability of the hotel during the works. As such, the layout of the extensions would ensure a completed redevelopment that provides an enhanced hotel environment that accords with the existing hotel layout.
- 8.22 The basement area to the south-east of the site would be infilled and fitted with a green roof with rooflight to provide space for five new hotel rooms. The existing courtyard isn't visible from public areas, and as such this element of the scheme would not affect the character and appearance of the area. The infill extension would be finished with roof lights and a green roof to maximise internal daylighting and urban greening. As such, this feature is supported in design terms. A rear terrace would also be slightly extended at ground level in a similar area, which is similarly hidden and therefore also supported.
- 8.23 The side/rear extension to the north-east of the building would be provided over eight storeys (including the proposed mansard) and would include a stair/lift core and new guest rooms. At roof level existing plant would be removed to facilitate a mansard extension to create an eighth floor.



Figure 8 – Proposed basement infill (left) and its roof at ground level (right)

- 8.24 The side and rear element of the proposals responds sensitively to the context, reinforcing the established building line at ground and first floor level, contributing to street-level activity, and enhancing the overall townscape quality. The massing and scale of the side/rear elevation have been limited to avoid visual dominance.
- 8.25 Materiality of this part of the proposal is complimentary, using muted and high-quality finishes to avoid visual discord with the relaxed pedestrianised character of Woburn Walk.



Figure 9 – Proposal at first (left) and second floor level (right) showing infill extension in yellow

- 8.26 The datum of the proposed ground and first floor extension has been taken from the host building to tie in with the existing stonework. The first floor

fenestration is provided to reflect the existing context including on the host building also. A larger entrance has been provided with recessed bay windows on either side, which mirrors the style of the nearby townhouses on Woburn Walk, and helps to balance the proposed new façade on that street. Servicing and plant will be integrated internally, ensuring no mechanical or waste infrastructure disrupts passers-by on Woburn Walk.



Figure 10 – Proposed extension at street level on Woburn Walk, showing the continued first floor datum from the existing building

- 8.27 The windows on the rear façade of the elevation have been aligned centrally to reflect the appearance of the existing rear elevation. This achieves a refined simplicity and uncluttered fenestration layout that does not compete with the listed townhouses on Woburn Walk.
- 8.28 At roof level the proposed slate mansard reflects a feature that is visible on other buildings in the area, and which carefully increases the scale of the building without excessively adding to its massing. The bulk of the mansard has been minimised in the design by relocating the internal lift shaft to a location further within the building and by ensuring all roof sides are sloped and not squared off in any areas.

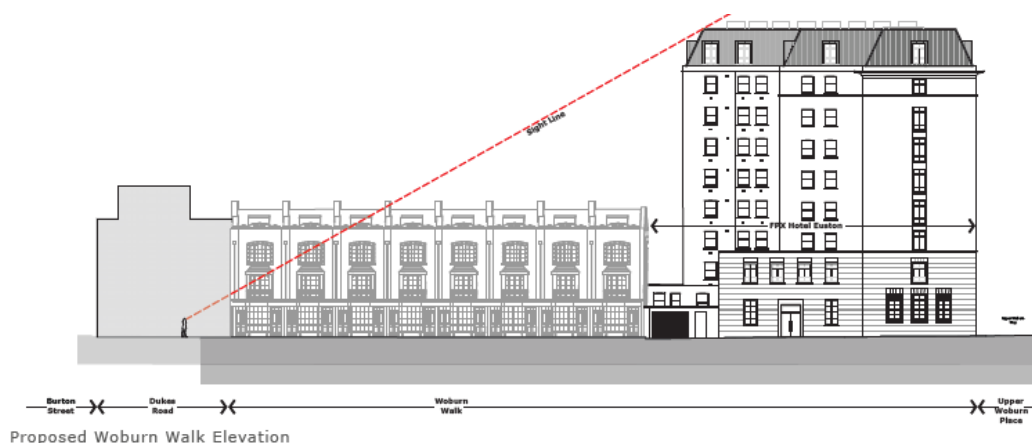


Figure 11 – Proposed sight line of roof extensions from Woburn Walk

- 8.29 The existing plant of the hotel would be strategically re-located to the roof level and set back sufficiently to ensure they are entirely screened in local

views. Ductwork would be contained within a dedicated brick pier feature to ensure such facilities aren't visible from the surrounding area. The height of the mansard roof has been kept as low as possible whilst also enabling good quality accommodation and the fenestration of the proposed extension would accord well with the rest of the building.

- 8.30 The proposed development would add a sensitively designed, subordinate extension to the existing hotel that currently reads as clearly separate from the historic street environment to the west. The side and rear infill extension would be stepped in from both the existing side elevation and substantially from the existing rear elevation above first floor level, which reduces its apparent bulk and massing in views from Woburn Walk.
- 8.31 The Council's Design Officer supports the scale, massing and materiality of the proposal subject to details being secured through condition (no. 3).

Design and heritage – summary

- 8.32 It is considered that there is no harm arising to the Bloomsbury Conservation Area nor to the setting of any other heritage assets as the result of the proposed development, as described above. From a design perspective the development would be a well-considered and high-quality contemporary addition to the building which accords with the character and appearance of the local area.
- 8.33 The proposal would create a high-quality hotel extension as part of a wider refurbishment of the building which would retain a strong presence on Upper Woburn Place and responds sensitively to the lower scale pedestrianised street of Woburn Walk to the north.
- 8.34 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the 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.
- 8.35 Special regard has also 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.
- 8.36 Therefore, it is considered that the proposed development is acceptable in design and heritage terms.

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.

- 9.2 Impacts from construction works are also relevant but are dealt with in the 'Transport' section rather than here. The thrust of the CLP 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 – non-residential premises

- 9.3 Paragraph 3.7 of the Amenity CPG states:

“Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report.”

- 9.4 In the case of this development proposal, many properties nearby are non-sensitive uses such as hotels, shop units and restaurants/café's. The impact of the proposed development on these non-residential activities is considered minimal given the scale and massing of the proposed extensions and as such limited weight is attached to any impacts.

Daylight and sunlight – residential premises

- 9.5 A *Daylight and Sunlight – Impact on Neighbouring Properties Report* by GIA has been submitted as part of the application which considers potential impacts in terms of daylight and sunlight upon neighbouring properties.
- 9.6 The area surrounding the site is predominantly commercial. The GIA Report states that Endsleigh Court (opposite the site to the west) is a residential building and there are mixed use buildings nearby on Woburn Walk (upper floors of nos. 4-8 to the east) that include residential accommodation.
- 9.7 Whilst there are other properties in the area with residential accommodation on site the GIA Report states they are too far away to be meaningfully affected by the proposed development in terms of day and sunlight impacts.
- 9.8 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.
- 9.9 Paragraph 130 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, if the resulting scheme would otherwise provide acceptable living standards.

Methodology

9.10 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

9.11 The GIA report states that the modest scale of the infill and extension nature of the proposal means the impact on the surrounding properties will be minimal and fully compliant with the BRE guidelines for daylight, sunlight and overshadowing, which are explained above.

9.12 Most properties close to the site are not residential properties. Of those that are, all windows on Endsleigh Court (opposite the site to the west) would be affected well below the VSC reduction threshold of 20% with reductions

ranging from 0% to 4.2%. None of the site-facing windows on that building are within 90 degrees of due south and therefore there would be no sunlight impact from this development.

- 9.13 The upper-level windows of the residential properties that could be affected on Woburn Walk would all face away from the development and as such impacts on those windows in terms of daylight and sunlight would also be minimal and therefore would be within acceptable limits.
- 9.14 The GIA report includes a supplementary study to appraise the effect of the scheme on the overshadowing of the pedestrian street at Woburn Walk. This shows that the already low levels of sunlight received by the street on the spring equinox (21st March) will not be noticeably diminished by the introduction of the proposed infill and roof extension. There would be a reduction in sunlight coverage on that date from 2% of the street to 0.7% of the street but, as can be seen from the figure below, only the far end of the street is affected.
- 9.15 The figure below also shows that there would be no change to the amount of sunlight received to residential gardens on that date, as they are already heavily overshadowed by surrounding buildings.



Figure 12 – Showing sun-on-ground (in yellow) impact in exiting (upper) and proposed (lower) situations

- 9.16 As such, the proposed development is considered compatible with both the London Plan and Camden's Local Plan with regard to daylight and sunlight impacts, and in terms of overshadowing of nearby public spaces.

Outlook and Privacy

- 9.17 For similar reasons to the day/sunlight assessment above, noting that the existing hotel building is already substantial in size and would be extended through an infill side/rear extension and additional roof space only, and that

neighbouring residential windows are either well-separated from the site by an existing road or face away from the building, it is considered there would be no negative impact to the outlook and privacy of nearby residential uses.

- 9.18 The existing hotel amenity areas at rear would be enclosed through this proposal which would reduce potential for overlooking from these areas by hotel patrons. An existing terrace within the southern recess would be extended to the rear however given it would be sited within this recess between the host building immediately to the north and the non-residential Tavistock House to the south, and given the outlook from the terrace would not include direct views towards any residential properties, the potential for additional overlooking from this area would be minimal. The green roof is not permitted for use as an amenity area which would be controlled by condition (no. 9).

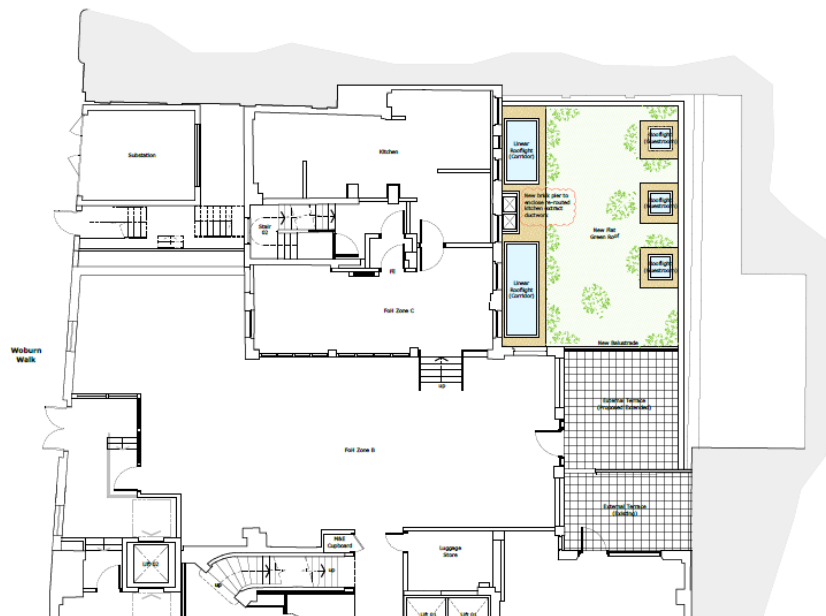


Figure 13 – rear of site at ground floor showing existing and proposed terraces adjacent to the new (inaccessible) green roof

Noise and Odours

- 9.19 Policy A4 of the Local Plan seeks to ensure that noise and vibration is controlled and managed, with regard to the thresholds as stated in Appendix 3 of the Plan.
- 9.20 Although the intensity of the uses within the building is expected to increase as a result of this proposal the site is already located in a busy commercial part of the Central London Area and as such it is considered that the noise associated with comings and goings to and from the site, as it would be extended by this proposed development, would not increase disturbance to local residents or businesses above and beyond the existing situation.

- 9.21 The proposed side/rear extension would include an entrance off Woburn Walk. However, there is already an existing hotel access in that location, adjacent to the existing courtyard amenity area which would be infilled. It is considered that any increase in pedestrian activity in this area would not be significant in terms of its creation of additional noise disturbance, given that Woburn Walk is already a commercial street with shops and food/drink vendors.
- 9.22 As discussed above, a rear terrace at ground level would be expanded. However, the terrace is not significant in size and is not sited close to residential properties. Given that two existing amenity areas for the hotel are being replaced it is considered that this extended space would not cause additional noise disturbance to existing residents.
- 9.23 The *Noise Impact Assessment* submitted with the application explains that the proposed plant has been specified to ensure no impact on the amenity of surrounding residents through increased noise.
- 9.24 Plant equipment would be installed at roof level as far away as possible from the nearest residential receptors. Noise from the proposed plant is considered to have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building and the proposed development itself.
- 9.25 Camden's environmental noise criteria requires that external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises.
- 9.26 It is considered that the proposed plant installations should therefore be capable of achieving the Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors.
- 9.27 Furthermore, the kitchen extract equipment has been integrated into the development through a brick pier feature on the southern elevation that would discharge emissions at roof level as far away as possible from residential properties, with fumes to be controlled through condition (no. 6).
- 9.28 The Council's Environmental Health Officer has raised no objections subject to conditions (nos. 4 & 5) that would control noise and vibration emissions from the proposed plant equipment.
- 9.29 It is relevant to note that although there is an existing enforcement case open relating to ongoing noise disturbance, design and siting concerns for kitchen extract plant at this site, which is currently positioned on a ground floor flat

roof to the rear (east) of the site, these matters are in the process of being resolved through application ref. 2026/0792/P which remains under assessment. The proposed development, should it be granted permission and completed, would provide a long-term solution to the noise and other concerns relating to that plant. However, application ref. 2026/0792/P intends to secure an alternative solution in the short term through the installation of a brick screen and other noise control methodologies such as power controls. Matters relating to impacts from the existing plant are therefore being addressed under that other application and this application focusses solely on the proposed long-term plant solution as described in the sections above.

- 9.30 As such, it is considered there would be no unacceptable impacts on nearby residential properties in terms of disturbance from excessive noise and odours, subject to conditions.

10. SUSTAINABILITY AND ENERGY

- 10.1 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.
- 10.2 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

- 10.3 This development proposal to extend the hotel has come forward as part of the longer-term refurbishment of the existing hotel which started in 2023. As such, the sustainability of the extended hotel is necessarily constrained by the existing building, works already completed, wider qualitative aims of the proposed development such as the desire to improve accessibility, and design and heritage considerations as described in the relevant sections above.
- 10.4 Sustainability features for this proposal include air source heat pumps which will drive heating, cooling and hot water systems and the generation of electricity on site which will be provided via a 11-panel photovoltaic (solar) array.
- 10.5 The development aims to achieve resource efficiency through recycling and reuse of materials and as such a condition (no. 12) will be secured requiring a minimum of 95% of construction and demolition waste to be reused,

recycled, or recovered, and 95% or greater of demolition/strip out and construction waste will be diverted from landfill and put to beneficial use.

Energy and carbon reductions

- 10.6 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). 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).

Total carbon reductions

- 10.7 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline for non-residential developments now already includes low carbon heating measures (such as ASHP) before the reduction is calculated.
- 10.8 For non-residential extension and refurbishment schemes of between 500sqm and 1000sqm of new floor space, such as this, on-site carbon should be reduced as much as possible in accordance with Policy CC1 of the Local Plan. There is no specific percentage reduction target to meet and instead the requirement is to maximise reductions as far as possible.
- 10.9 The table below shows the level of carbon reduction the proposed development would achieve.

Energy strategy	Non-residential new-build		
	Total tCO2	Stage reduction, tCO2	Stage reduction, %
Baseline	13.68	N/A	N/A
Be Lean	8.85	4.8	35.3%
Be Clean	8.85	0.0	0.0%
Be Green	6.99	1.9	21.1%
TOTAL	6.99	6.7	48.9%

Figure 14 – Table showing carbon reduction levels

- 10.10 In this case, using the up-to-date Part L 2021 carbon calculations, the development meets the carbon reductions policy target for major developments of a 35% reduction overall (48.9% achieved in total), which is considered acceptable given the scheme it achieves major development targets despite not being a major development.

Be lean stage (reduce energy demand)

- 10.11 London Plan policy SI 2 sets a policy target of at least a 15% reduction through reduced energy demand at the first stage of the energy hierarchy for commercial developments.
- 10.12 In this case, the development exceeds the policy target of 15% by reducing emissions by 35.3% at this stage through energy efficient design, in compliance with the development plan. The proposed development includes high quality insulation, low energy lighting and energy efficient plant. The cooling hierarchy has been utilised to minimise overheating through measures such as green roofs, low heat LED lighting and the use of low G-value glazing to minimise solar gains internally.
- 10.13 It is acknowledged that some active cooling (air conditioning) already exists within the hotel and the extension will need to reflect that existing arrangement, given the high level of connectivity between the host building and the extension. The proposal would include energy efficient mechanical ventilation systems with heat recovery to help keep the building at suitable temperatures. The central air handling units make use of the proposed integrated air source heat pumps to meet the baseline ventilation heating and cooling loads.
- 10.14 The *Thermal Comfort Analysis* report submitted with the application demonstrates that natural ventilation would usually be sufficient to cool the building. However, the roadside location of the hotel and its noisy acoustic environment means that hotel windows cannot be opened for long-enough periods of time that would overcome the risk of overheating. As such, active cooling is considered justified in this case. The applicant has demonstrated that all practicable measures within the cooling hierarchy have been integrated into the scheme and tested through thermal modelling. Final details of active cooling measures shall be secured by condition (no. 7).

Be clean stage (decentralised energy supply)

- 10.15 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.
- 10.16 It is important to note in this case that, although the proposed development includes a substantial refurbishment of the existing building, it is only a minor planning application in floorspace terms. Furthermore, there are no existing or planned heat networks close to the site, according to the London Heat Map, that this minor proposal could connect to.
- 10.17 As such, it is considered that a connection from the site to a local heat network would not be feasible at this time and thus cannot be insisted upon in for this development proposal.

Be green stage (renewables)

- 10.18 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.
- 10.19 The development meets the policy target of 20%, reducing emissions by 21.1% at this stage through renewables in the form of photovoltaics on the roof. The roof area is required for plant storage as well as PVs and as such the amount of space for generation is necessarily limited.

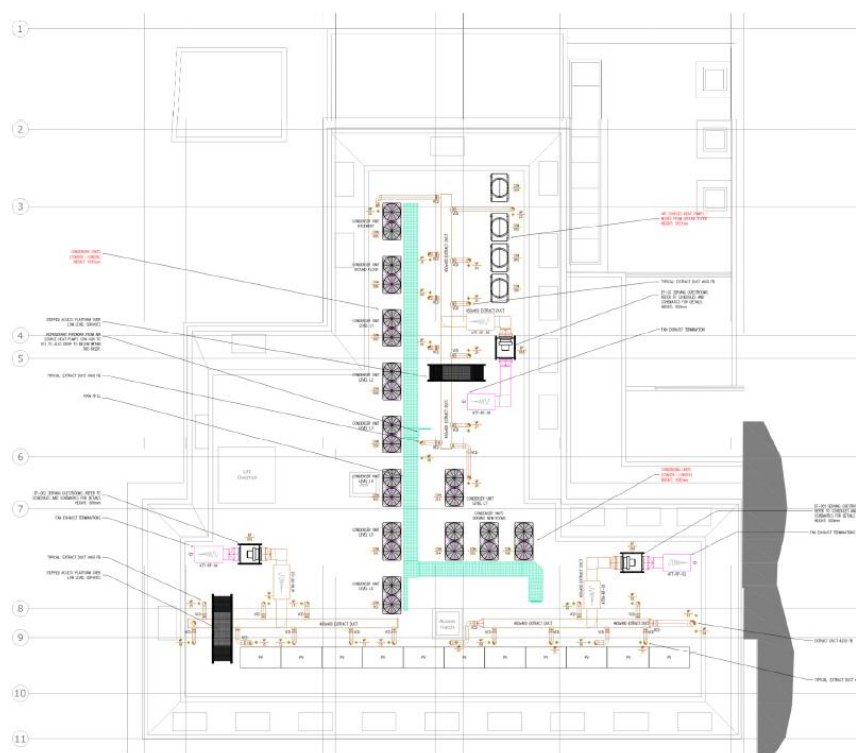


Figure 15 – Proposed plant layout at roof level

- 10.20 The Council's Sustainability Officer accepts the roof space limitations and is generally supportive of the overall carbon reductions achieved, noting that the carbon reductions achieved are policy compliant.
- 10.21 Monitoring of the energy output from the development would be secured through the Section 106 legal agreement.

Be seen (energy monitoring)

- 10.22 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. The applicant has agreed to this reporting, which shall be undertaken via automated building management and energy monitoring equipment.

- 10.23 The Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.
- 10.24 Summary
- 10.25 The proposal is considered acceptable in terms of its carbon reduction measures overall as it meets carbon reduction targets in accordance with Policy CC1 of the Camden Local Plan.
- 10.26 As such, it is considered that the proposed development is acceptable in terms of its carbon reduction measures.

Climate change adaption and sustainable design

- 10.27 Local Plan policy CC2 expects non-residential development to meet BREEAM 'Excellent' and the application meets this requirement by achieving a target score of 76.8%. This will be secured through s106 legal agreement.
- 10.28 CLP policy CC3 and London Plan policy SI12 and SI13 also seek to ensure development does not increase flood risk, reducing the risk of flooding where possible. To ensure this occurs development should incorporate sustainable drainage systems (SUDS) and water efficiency measures wherever possible.
- 10.29 The development incorporates SUDS in the form of a green roof provided over the proposed basement extension. This will contribute to minimising surface water runoff and maximising site greening and biodiversity. Further details can be secured by condition (no. 8).
- 10.30 Flood risk is covered in more detail in the 'Flood risk and drainage' section of this report.

11. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 11.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation.
- 11.2 There are no trees on the host site. However, the surrounding area includes street trees on Woburn Walk and trees within the rear amenity spaces of the properties fronting onto Woburn Walk.

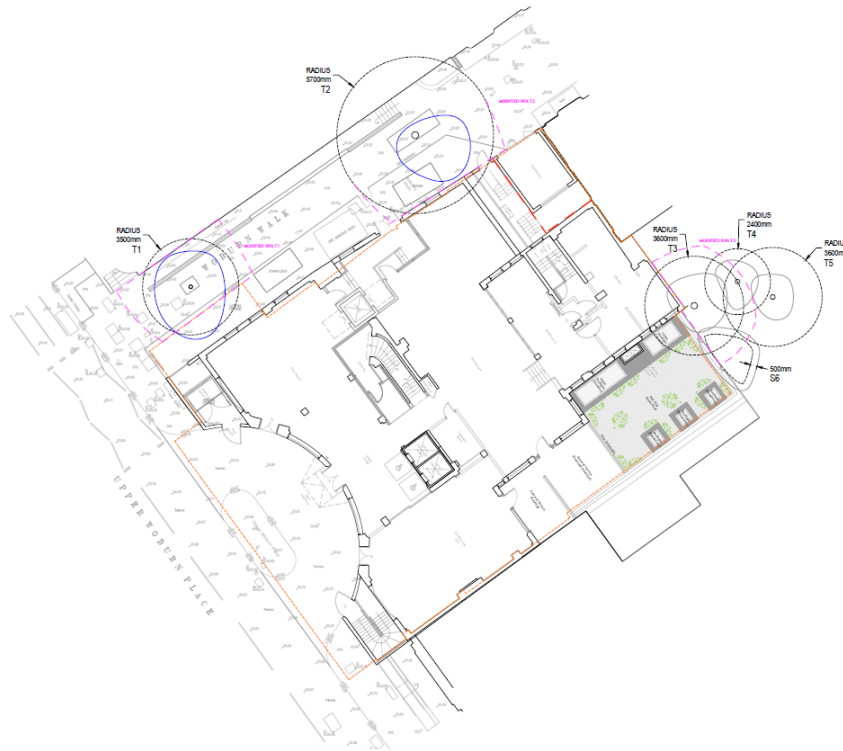


Figure 16 – Plan showing trees around the existing site

- 11.3 An *Arboricultural Impact Assessment and Method Statement* report has been submitted with the application. The street trees will be protected by fencing, and some pruning of other neighbouring trees may be required but would be within reasonable limits. Given these trees are outside of the application site and owned by others the applicant will be required to seek the permission of those owners before undertaking any tree works. Tree works applications may also be required. Permission for this pruning is not given as part of this application. The principle of the proposed tree works has been reviewed by the Council's Tree Officer who has confirmed that the impact of the scheme on local trees would be of an acceptable level and the proposed tree protection details are considered sufficient to demonstrate that the trees can be adequately protected, subject to submission of the appropriate tree works applications as necessary.
- 11.4 The Tree Officer recommends a condition (no. 10) to ensure tree protection measures are in accordance with the submitted plan.
- 11.5 The development incorporates a green roof over the proposed basement extension, which helps to maximise site greening and biodiversity and would be an improvement on the amount of greening provided at the existing hotel. Details of the green roof will be secured through condition (no. 8).
- 11.6 Given the above, the proposals are considered acceptable in terms of tree protection and greening in line with the development plan.

Statutory Biodiversity Net Gain

- 11.7 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 11.8 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 11.9 This gain can be achieved 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.
- 11.10 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an on-site 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.
- 11.11 An appropriate informative will added to any planning permission, should it be granted.

12. AIR QUALITY

- 12.1 Camden Local Plan policy CC4 is relevant with regards to air quality. An Air Quality Assessment (AQA) has been undertaken and submitted as part of the sustainability documentation for this application.
- 12.2 The application site is located within an area of poor air quality. In particular, the façade portion of the existing hotel facing the main road is subject to a very high concentration of NO₂.
- 12.3 The proposals would be car-free and the direct impact on local traffic activity from the proposed development is expected to be negligible in air quality terms as access to the site would be primarily from public transport.
- 12.4 Energy and hot water for the extension would be provided by air source heat pumps which would not worsen air quality in the local area. Fumes from the re-located kitchen extraction equipment would be controlled by condition (no. 6)
- 12.5 As such, the development's impact would be neutral in terms of its operational air quality impacts.

13. LAND CONTAMINATION

- 13.1 Policy A1 of the London Borough of Camden Local Plan states that the impact of development including from land contamination shall be appropriately managed.
- 13.2 No historic potentially contaminative land uses have been identified on the subject site. No soft landscaped areas (at ground level) are proposed, nor would any new contamination pathways or sensitive receptors be introduced. However, there will be some ground disturbance entailed in the basement extension. The Council's Land Contamination Officer was consulted on this application and raises no objections. A condition (no. 13) would be secured so that in the unlikely event that contamination is encountered works shall cease and an appropriate remediation plan shall be developed.
- 13.3 As such, the application is acceptable in terms of land contamination considerations, subject to a condition.

14. FLOOD RISK AND DRAINAGE

- 14.1 Policy CC3 is relevant with regards to flood risk and drainage. The site is located within a Flood Zone 1, which is an area that is least likely to flood.
- 14.2 The site is at low risk of fluvial, tidal and groundwater flooding. The level of potential surface water flooding is also not significant in this area. The basement area currently exists and would only be infilled as part of this proposed development. No new excavation works are proposed. Surface water drainage of the site would be improved through the provision of a green roof which will increase surface water attenuation.
- 14.3 Thames Water have not objected to these proposals and the Council's Lead Local Flood Officer also raised no objections.
- 14.4 As such, the proposed measures are considered acceptable in terms of flood risk and drainage.

15. TRANSPORT

Policy context

- 15.1 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.
- 15.2 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.
- 15.3 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 our objectives, policies, and measures for achieving this goal.
- 15.4 The Council's priorities include increasing walking and cycling; improving public transport in the Borough; reducing car ownership and use; improving the quality of our air; and making our streets and transport networks safe, accessible, and inclusive for all.
- 15.5 Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to our transport observations.
- 15.6 London Plan Policy T1 states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor's strategic target of 95% per cent of all trips in central London to be made by foot, cycle, or public transport by 2041, and 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.

Site location and access

- 15.7 The site is within the Bloomsbury Conservation Area on the east side of Upper Woburn Place, which forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. This site is also located approximately 130m south of Euston Road, which is part of Transport for London Road Network (TLRN). TfL is the highway authority for this road and is therefore responsible for its maintenance.
- 15.8 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). The closest London Underground stations to the site are Euston, King's Cross and Russell Square, located approximately 450 north, 750 north-east and 700 south of the site, respectively. Euston and King's Cross stations also provide national rail services. The site is well connected to the bus network, with several stops located on Upper Woburn Place and Euston Road.
- 15.9 The nearest Santander cycle hire docking station is located on Endsleigh Gardens, approximately 100m north of the site. The nearest dedicated

parking bays for dockless rental e-bikes and rental e-scooters are located on Endsleigh Gardens and Tavistock Square, approximately 100m north and 230m south of the site, respectively. However, these bays are already showing signs of overcapacity and increasing demand.

- 15.10 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades of 3 and 5 in the vicinity of the site, which indicates significant opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 15.11 The national TRICS database was used to derive the anticipated total person trip rates for the proposed development, with comparable hotel sites considered based on location, size, accessibility from public transport and car parking availability. The net change in multi-modal trips, based on a hotel extension of 39 additional guest rooms and as presented in Table 5.1 of Transport Statement, is reproduced here:

	Cars		Cyclists		Public Transport		Walk		Goods Vehicles	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
TOTAL (whole day)	18	18	5	5	58	49	64	74	2	2

- 15.12 The overall number of new trips is expected to total 295. Although some new car trips are shown it is expected that the actual number of cars would be lower in reality due to the excellent public transport accessibility of the site and the lack of available parking both on site and in the local area. The proposed development will result in a significant increase in person trips on foot and via public transport. Based on other similar developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Euston, King's Cross and Russell Square stations, nearby bus stops and shopping, entertainment and restaurant venues.
- 15.13 Given this increase in active travel is generated by the uplift in hotel bedrooms, the applicant must provide a financial contribution towards active

travel schemes in the local area, including public realm improvements, which will be secured through section 106 legal agreement.

Travel planning

- 15.14 A draft travel plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. An updated travel plan, including modal share projections for both walking and cycling in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy, and associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Cycle parking

- 15.15 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) the standards are: 1 space per 20 bedrooms long-stay, and 1 space per 50 bedrooms short-stay.
- 15.16 Two long-stay cycle parking spaces would be provided at basement level, accessed via the existing goods lift which can be reached from the front of the site at ground floor level. One visitor cycle space will be provided in the form of a Sheffield stand on the public highway. Details of on-site cycle parking will be secured by condition (no. 11). An off-site cycle parking contribution of £300 will be secured via Section 106 legal agreement. The proposed cycle parking provision is in accordance with London Plan policy and CPG Transport guidance and is therefore acceptable.

Car Parking

- 15.17 The site is in controlled parking zone CA-D (Kings Cross Area), which operates relatively limited hours for a central London location, from 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday. There is no motor vehicle parking on site.
- 15.18 The development would be secured as car-free by legal agreement.
- 15.19 As there is no Blue Badge parking provided on site it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site.
- 15.20 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 when controls are not active (i.e. overnight, on Saturday evenings or on Sundays).

- 15.21 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 Section 106 legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

Coach and taxi parking

- 15.22 The existing hotel has no existing controls over taxi and coach visits to the site and their parking arrangements. The proposed development has the potential to cause an increase in coach party visits to the site which could increase periods of occupation of the existing 'drop-off' parking space at the front of the site and subsequently impact vehicle movements and highway safety on Upper Woburn Place.
- 15.23 As such, it is considered reasonable that a taxi and coach access management plan is submitted to the Council to ensure that impacts on Upper Woburn Place in the vicinity of the hotel are minimised and controlled where appropriate. This can be secured by s106 obligation secured through legal agreement.

Micro and shared mobility improvements

- 15.24 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.
- 15.25 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 15.26 A cycle/e-scooter hire improvements contribution of £5,000 would therefore be secured as a Section 106 planning obligation if planning permission is granted. 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.

Pedestrian, cycling and environmental improvements

- 15.27 Securing financial planning obligations from developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.
- 15.28 In line with the increase in walking and cycle trips generated by the proposed development (148 new trips), and with further future pedestrian and cycle trips to be promoted by the requested Travel Plan, we will seek a financial contribution of £80,000 towards infrastructure improvement schemes and public realm enhancements in Russell Square and Gordon Square areas and in Fitzrovia, the Euston to Kings Cross "Wellbeing Walk" to improve the parallel route south of Euston Road especially for pedestrians with wider road safety, cycling and public realm enhancements and the extension of bus lanes and/or bus lane hours of control on Upper Woburn Place bus corridor, incorporate cycling, walking and wider road safety improvements where feasible, and junction improvements around Russell Square.
- 15.29 This contribution would be secured by a legal agreement if planning permission is granted.

Highway works

- 15.30 Where construction works have the potential to result in damage to the public highway the Council requires a highways contribution is secured by legal agreement if planning permission is granted. For a development of this size and scale a contribution of £20,000 will be secured.

Construction management

- 15.31 The site is located on Upper Woburn Place which forms part of the Strategic Road Network (SRN), and near Euston Road, which is part of the TLRN. 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. Our primary concern is public safety, but we 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. A more detailed Construction Management Plan (CMP) document will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

- 15.32 TfL raised no objections to the development subject to further information regarding construction management and its impact on the TLRN being secured. This will also be secured through legal agreement as part of the CMP.
- 15.33 The Council will expect 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. The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 15.34 Implementation support contributions of £10,116 and construction impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.
- 15.35 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction shall also be secured by legal agreement.

Deliveries and servicing

- 15.36 Servicing will remain in line with existing arrangements from Upper Woburn Place, utilising mainly light goods vehicles. Deliveries will be scheduled to occur outside of peak hours, specifically between 10:00 AM and 2:00 PM, Monday to Friday.
- 15.37 Delivery and Servicing would remain consistent with the existing situation on site. Linen servicing is undertaken three times a week, with the lorry providing both delivery and collection in one visit. The Council's Transport Officer has no objection to this arrangement and therefore it is considered acceptable.

Summary

- 15.38 The proposal is acceptable in terms of transport implications subject to the securing of planning obligations through s106 legal agreement, as described in the paragraphs above.

16. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 16.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it provides close to 1,000sqm of new floor space and is expected to exceed £3million in construction costs (costs currently estimated at circa £9million).
- 16.2 To ensure local people benefit from these opportunities in line with Local Plan Policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.
- **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. For this application this is expected to be three apprenticeships.
 - **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 King's Cross Construction 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.
- 16.3 Camden Planning Guidance (Employment Sites and Business Premises) sets out that the Council will seek to secure employment and training contributions through Section 106 agreements from commercial developments, including hotel uses, where these generate employment opportunities. The CPG supports contributions from schemes which create employment, including hospitality uses, and provides a specific methodology for hotel developments based on the number of bedrooms. The contribution will be used to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden.

- 16.4 The applicant has indicated that the proposal would result in a net increase of approximately 2 full-time equivalent jobs. However, the Council applies a standardised approach to estimating employment generation in hotel developments, as set out in the Camden Planning Guidance.. This assumes a ratio of 0.5 full-time equivalent jobs per hotel bedroom. A financial contribution of **£5,724 (index linked)** is therefore considered appropriate and would be secured through a Section 106 agreement to support local employment and training initiatives.
- 16.5 As part of these end user employment measures an on-site apprenticeship shall also be secured.
- 16.6 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, which shall also include joining the Camden Inclusive Business Network and working with Good Work Camden and the Council's Inclusive Economy Service to recruit locally and provide employment support to those who require it.

17. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 17.1 The CIL applies to all proposals which add 100m² of new floorspace. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 17.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£76,400** (955sqm x £80). Indexing has not been applied to this figure.
- 17.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone A (central) where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is **£105,050** (955sqm x £110 for hotel uses). Indexing has not been applied to this figure.

18. CONCLUSION

- 18.1 The application is for an infill side extension of the existing building, plus a further extension to the roof and an extension to the basement, and additional ancillary works, to provide additional visitor accommodation floor space on site. The development would provide an uplift in floorspace of 955sqm.
- 18.2 The land use on site would not change as the existing building is currently in hotel use. The proposed development cannot incorporate housing and as such a financial contribution would be provided in lieu of this on-site housing

provision instead, in line with the requirements of policy H2 of the Camden Local Plan, to be secured through Section 106 agreement.

- 18.3 The proposal would refurbish and extend an existing building that is identified as a positive contributor to the Bloomsbury Conservation Area. Demolition would be kept to a minimum and would generally only occur to improve access or the quality and functionality of the internal accommodation. There would be no harm to the conservation area and as such it is considered the proposed development would preserve the character and appearance of the Bloomsbury Conservation Area and would not negatively impact the setting of other nearby heritage assets.
- 18.4 The proposed extensions and other associated works would have high-quality architecture as demonstrated through their well-considered composition, detailing and materiality and as such it is considered the proposal would not negatively impact the character and appearance of the host building and the surrounding area.
- 18.5 The proposed development has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook and privacy. The proposed end uses would also not create significant levels of additional noise disturbance.
- 18.6 The proposed development would be car-free and would support sustainable transport methodologies through the provision of additional secure cycle parking on-site plus financial contributions in support of public realm and other local transport improvements, to be secured through Section 106 legal agreement.
- 18.7 The proposed development minimises energy demand through exceeding the relevant carbon reduction policy targets for commercial development and achieving BREEAM 'excellent' certification through the provision of air source heat pumps, PV panels, a green roof and the use of sustainable building materials.
- 18.8 Construction works necessary for this proposed development are required to adhere to a detailed construction management plan, supported by appropriate financial contributions, to be secured through Section 106 legal agreement, which would protect the amenity of nearby residents and minimise the impact of the development on the local public realm.
- 18.9 The scheme complies with the development plan as a whole and therefore is recommended for approval, subject to a condition and obligations secured through a Section 106 legal agreement.

Public benefits

18.10 No harm has been identified to heritage assets but if the committee decides there is harm, there are several public benefits that could weigh against that harm.

- Meeting increased demand for visitor accommodation in the Central London Area.
- Permanent jobs on-site and temporary jobs construction.
- Apprenticeships and work experience placements.
- Improved site greening and surface water retention.
- Provision of dedicated cycle parking and financial contributions towards wider sustainable transport improvements.
- Financial contributions towards public realm improvements.

19. RECOMMENDATION

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

- Affordable Housing Payment in Lieu of £716,250
- Energy and Sustainability Report
- 'Be Seen' Energy Monitoring
- Car Free Development
- Coach and Taxi Management Plan
- Construction Management Plan (CMP) (in consultation with TfL)
- CMP Implementation Support Fee of £10,116
- CMP Impact Bond of £16,000
- Highways Contribution of £20,000
- Construction Working Group
- Cycle Parking Contribution of £300
- Disabled Parking Space Contribution of £4,000
- Electric Vehicle Charging Point Contribution (Fast Charge) of £20,000
- Micromobility Parking Contribution of £5,000
- Travel Plan (TP)
- TP Monitoring and Measures Contribution of £11,348
- Pedestrian Cycling and Environment contribution of £80,000
- Employment and Training (E&T) Measures
 - E&T Financial Contribution of £5,724 (index linked)
 - 3 Construction Apprentices
 - Construction Apprentice Support Fee of £5,100
 - 2 Construction Work Experience Placements
 - 1 End User Apprentice
 - Local Recruitment (Target of 20% of Workforce, Working with Euston Skills Centre)

- Local Procurement (Target of 10% of Value of Construction Contract, Camden Local Procurement Code)
- Other Related E&T Measures including
 - (i) Joining the Camden Inclusive Business Network
 - (ii) Working with Good Work Camden and the Council's Inclusive Economy Service to recruit locally and provide supported employment initiatives, if appropriate

20. LEGAL COMMENTS

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

21. CONDITIONS

1.	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.	The development hereby permitted shall be carried out in accordance with the following approved plans and documents: Drawings – Existing: AL(00)001, AL(00)009 to AL(00)018 (all Rev. A); AL(00)022, AL(00)026, AL(00)027, AL(00)029; AL(00)030 to AL(00)033 (all Rev. A). Drawings – Proposed (Demolition): AL(10)009 Rev. B, AL(10)010 Rev. B, AL(10)011 to AL(10)018 (all Rev. C). Drawings – Proposed: AL(00)109 Rev. I, AL(00)110 to AL(00)117 (all Rev. K), AL(00)118 Rev. L, AL(00)119 Rev. H; AL(00)200 to AL(00)203; AL(00)300 Rev. L, AL(00)301 Rev. M, AL(00)302 Rev. I, AL(00)303 Rev. H. Supporting Documents: Planning Statement (October 2025) Design and Access Statement (amended, March 2026) Construction Management Plan Proforma (September 2025) Daylight and Sunlight Assessment (October 2025) Delivery and Servicing Strategy (October 2025) Transport Statement (October 2025) Travel Plan (October 2025) Energy/Sustainability Statement (October 2025) BREEAM Pre-Assessment (March 2026) Fire Statement Form (October 2025) Heritage Statement (October 2025) Plant Noise Impact Assessment (October 2025) Arboricultural Impact Assessment & Method Statement Report (June 2026) External Materials Schedule (Rev. A, March 2026) Thermal Comfort Analysis (July 2026) Reason: For the avoidance of doubt and in the interest of proper planning.
3.	Notwithstanding the details shown on the approved plans, prior to commencement of works detailed drawings, or samples of materials as appropriate, in respect of the following, 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, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20; b) A sample panel of the façade at 1:1 scale (minimum 1m x 1m in size) of the bay demonstrating the window reveal, proposed colour, texture, face-bond and pointing shall be provided on site and approved in writing by the local planning authority. The approved panel shall be retained on site until the work has been completed. c) 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). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and, d) Typical details of any railings and balustrades at a scale of 1:20, including method of fixing. The works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the development works. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the Camden Local Plan 2017.
4.	The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/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 premises are 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.
5.	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.
6.	The new hotel accommodation hereby approved shall not be occupied until the approved fume extraction and filtration system has been fully implemented. The approved fume extract system shall thereafter be retained and remain operational for the duration of the use hereby approved.

	The installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and discharge outlet, must be in accordance with the 'EMAQ+Control of Odour and Noise from Commercial Kitchen Exhaust Systems. Reason: To safeguard the appearance of the premises and the wider area and to ensure no nuisance or disturbance is caused to the detriment of the amenities of adjoining occupiers or to the area generally in accordance with policies A1, A4 and D1 of the Camden Local Plan 2017.
7.	The new hotel accommodation hereby approved shall not be occupied until evidence has been submitted and approved in writing by the Local Planning Authority, demonstrating that measures to adapt to climate change have been implemented and that overheating risk has been managed. The evidence must demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed and any feasible measures implemented. The measures to be implemented should include openable windows, solar PVs on the roof, LED/efficient lighting, internal blinds, insulated pipework, and mechanical ventilation as appropriate in accordance with the approved TM52 Thermal Comfort Analysis report dated July 2026. Reason: To ensure that the development reduces the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.
8.	Prior to commencement of the relevant part of the above-ground development, full details in respect of the approved green roof at ground floor level shall be submitted to and approved in writing by the local planning authority. Details of the green roof provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth (expected to be at least 150mm for substrate at the intensive green roof) is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter. Reason: To ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies.
9.	The flat green roof of the rear basement extension hereby approved shall not be used at any time as amenity space, and any access out onto this area shall be for maintenance purposes only.

	Reason: To safeguard the amenities of the adjoining neighbours in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.
10.	Prior to the commencement of works on site, tree protection measures shall be installed and working practices adopted in accordance with the document entitled Arboricultural Impact Assessment & Method Statement dated June 2026 ref. AIA/MF/0225/25. All trees on the site, or parts of trees grow from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details. The development shall be monitored by the project arboriculturalist in accordance with the approved report. Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.
11.	The new hotel accommodation hereby approved shall not be occupied until details of the provision to be made for cycle parking have been submitted to and approved in writing by the Local Planning Authority. The cycle parking shall thereafter be implemented in full in accordance with the approved details before the use hereby permitted commences and shall thereafter be retained solely for its designated use. Reason: To ensure adequate cycle parking is available on site, to promote sustainable modes of transport, and so safeguard the visual amenity of the area in accordance with policies A1 and T1 of the Camden Local Plan 2017.
12.	Prior to commencement of development, a waste management plan shall be submitted demonstrating how 95% of construction and demolition waste will be reused/recycled/recovered and 95% of excavation waste used for beneficial purposes. The plan shall thereafter be delivered in accordance with the approved details. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.
13.	If during construction/demolition works, evidence of potential contamination is encountered, works shall cease and the site fully assessed to enable an appropriate remediation plan to be developed. Works shall not recommence until an appropriate remediation scheme has been submitted to, and approved in writing by, the local planning authority and the remediation has been completed. Upon completion of the building works, this condition shall not be discharged until a closure report has been submitted to, and improved in writing by, the local planning authority. Reason: To ensure the impact of development is managed appropriately in accordance with policy A1 of the London Borough of Camden Local Plan 2017.

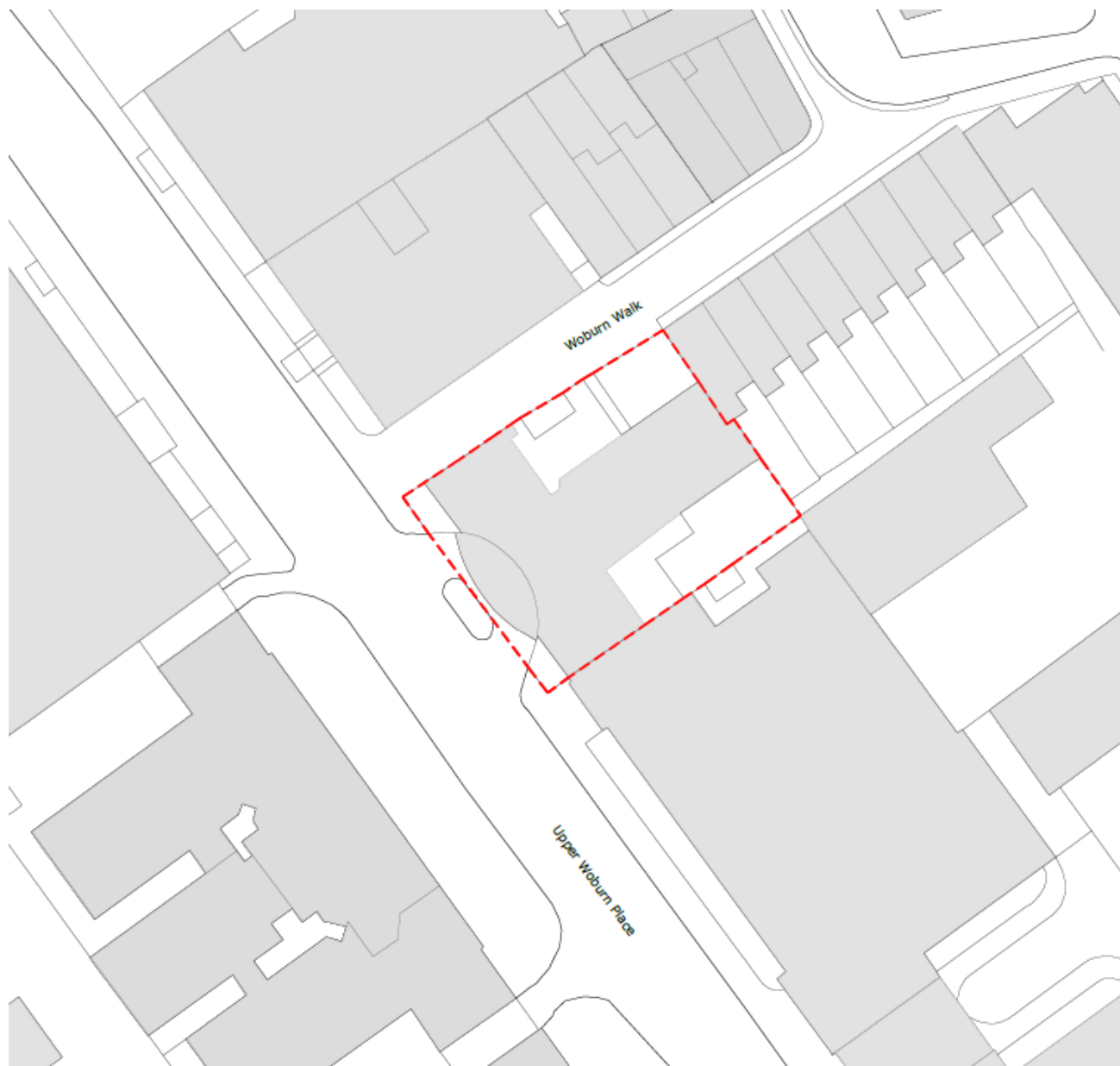
22. INFORMATIVES

1.	<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>
2.	<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 www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</i>
3.	<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 – 18:00 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>
4.	<i>At least 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>
5.	<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>
6.	<i>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</i>
7.	<i>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website or contact the</i>

	<i>Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444).</i>
8.	<i>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</i>
9.	<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 & 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>
10.	<i>This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk.</i>
11.	<i>Transport for London is prepared to provide to information about the proposed location of the Crossrail 2 tunnels and structures. It will supply guidelines about the design and location of third party structures in relation to the proposed tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the construction and use of the tunnels. Applicants are encouraged to discuss these guidelines with the Crossrail 2 engineer in the course of preparing detailed design and method statements.</i>
12.	<i>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</i>
13.	<i>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</i>

	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 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). ++ 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). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
14.	+ Irreplaceable habitat: 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. ++ The effect of section 73(2D) of the Town and Country Planning Act 1990 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.

	++ Phased development <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>
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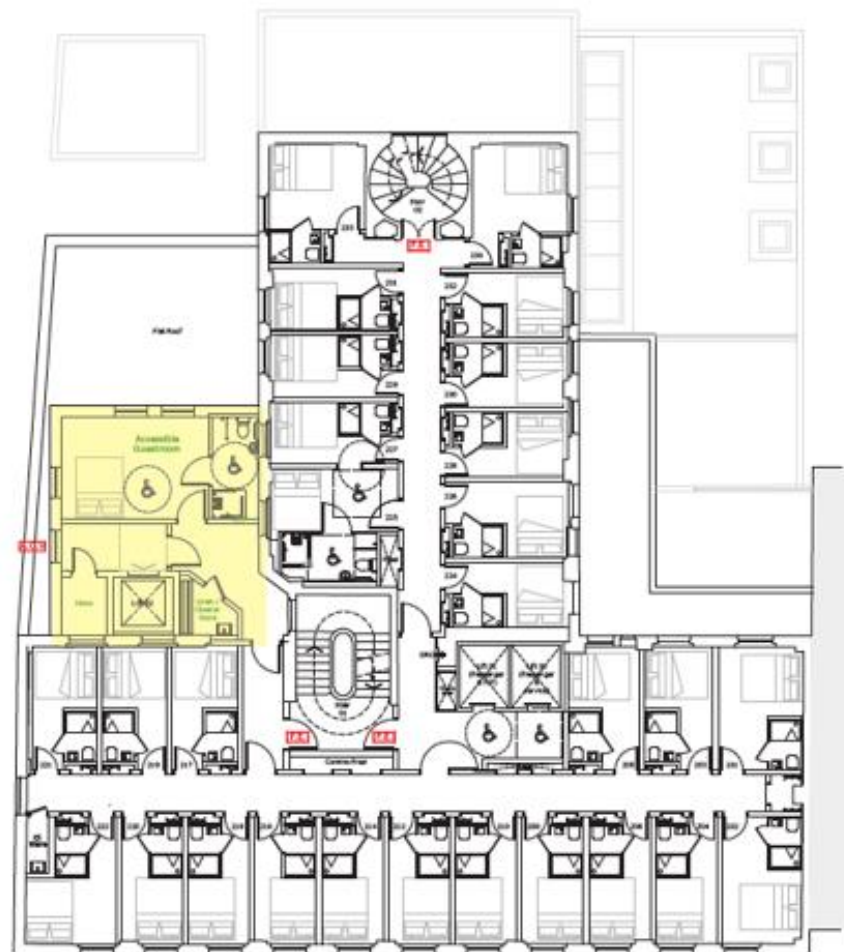
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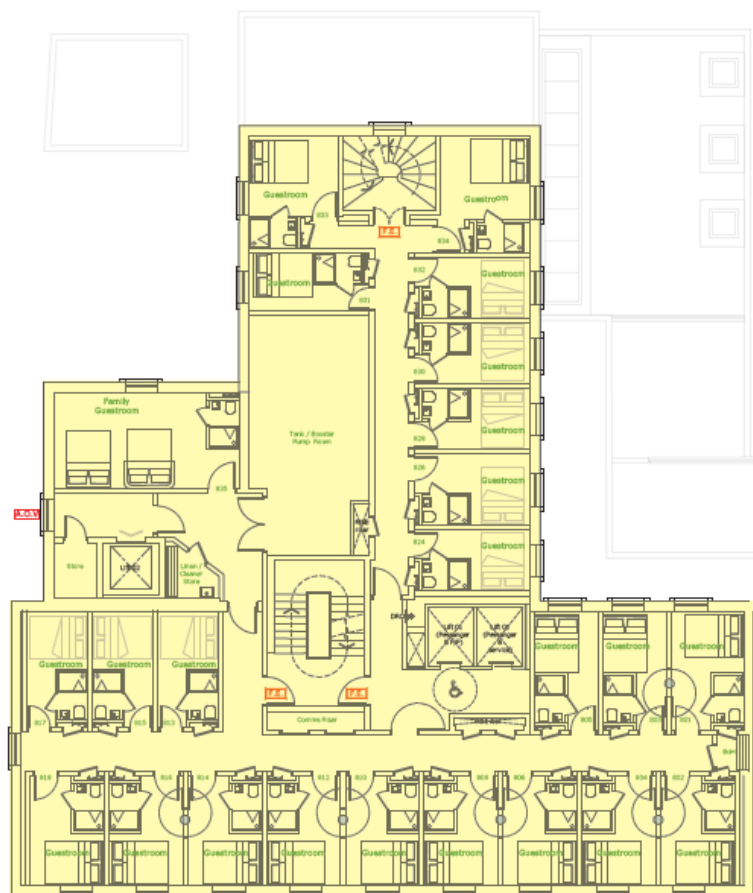
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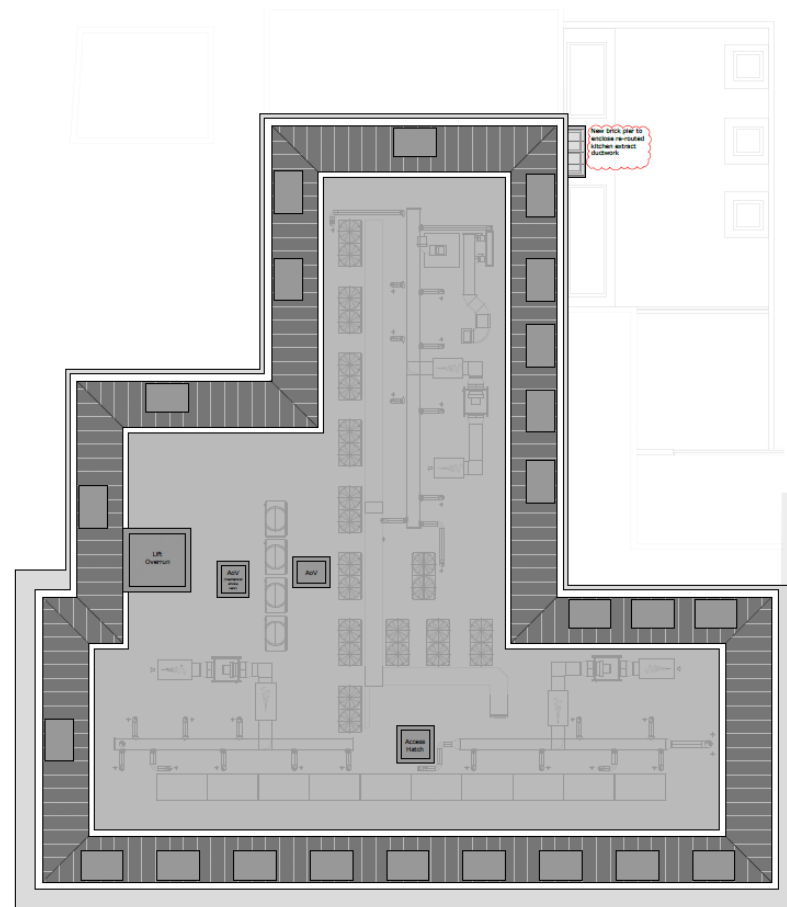
First



Upper



Roof



Roof Plant

Roofscape visual shoulder



Workshop View - Existing

Roof extension proportions in scale with adjacent buildings



Workshop View - Proposed





