



Report

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112a Great Russell Street Planning Statement

June 2015

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Appendix I	Decision notice dated 26 Sept 2014 (ref. 2013/5075/P)
Appendix II	Officer's delegated report (ref. 2013/5075/P)
Appendix III	Pre-application response dated 18 March 2015 (ref. 2015/1063/PRE)

1. Introduction

- 1.1 This Planning Statement has been prepared by GVA and is submitted in support of a revised application for the change of use of basement levels -4 and -5 of the NCP Car Park at 112a Great Russell Street. The application is made on behalf of Criterion Capital ('the applicant'). The application is submitted to the London Borough of Camden ('the council'). This statement demonstrates the planning case in support of the proposals in the context of relevant planning policy.
- 1.2 The proposed development involves the change of use of the basement levels -4 and -5 of what is presently used as a car park, to provide a hotel (Use Class C1), providing 166 bedrooms.
- 1.3 This planning application is the resubmission of a previously refused scheme. Following the refusal of 2013/5075/P, the applicant has reviewed the reasons for refusal and has addressed each of them in turn. It is now considered that the scheme satisfies the relevant policy tests.
- 1.4 The development proposals have been subject to pre application consultation with planning and sustainability officers at London Borough of Camden which has directly informed the scheme and the supporting documents of this resubmission.

Supporting Information

- 1.5 This statement should be read in conjunction with the following documents submitted in support of the application:
- Application form and certificates;
 - Application Drawings;
 - Design and Access Statement;
 - Air Quality Assessment;
 - Sustainability and Energy Statement, including BREEAM Pre-Assessment;
 - Summary of MEP Systems;
 - Existing Services Plans
 - Noise Impact Assessment;

- Transport Assessment;
- Basement Impact Assessment;
- Draft Construction Management Plan;
- Draft Hotel Management Plan;
- Fire Safety Assessment;
- Draft S.106 Agreement.

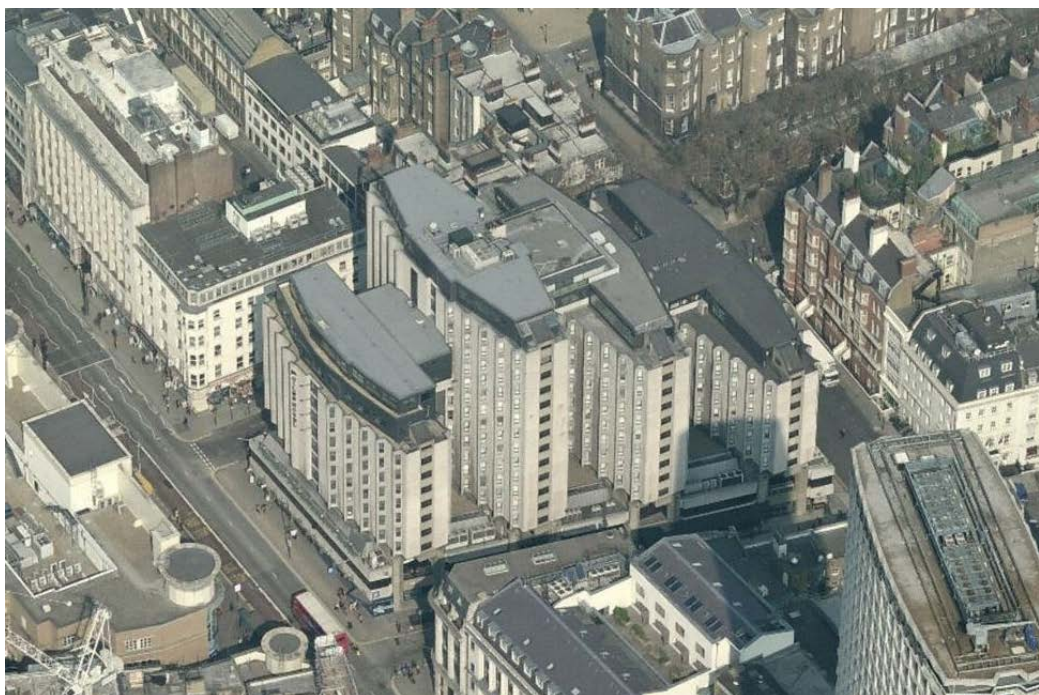
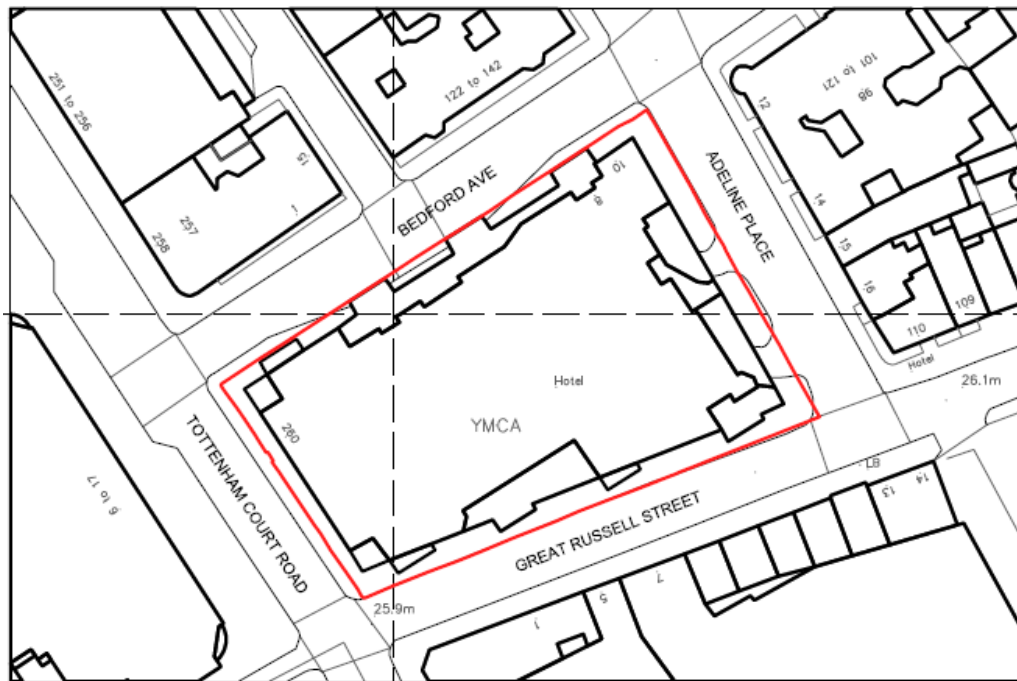
1.6 Whilst the above documents should be reviewed fully in order to gain a complete understanding of the planning application, this statement summarises their findings in the context of the planning policy framework that is applicable to the site.

1.7 In setting out the planning case in support of the proposals, the remainder of this Planning Statement is structured as follows:

- Section 2 describes the site location and its surroundings;
- Section 3 sets out the planning history, including a pre-application enquiry;
- Section 4 describes the development proposals;
- Section 5 discusses the planning policy considerations; and
- Section 6 provides the conclusions.

2. Site & surroundings

2.1 The site comprises a substantial modern post-war building occupying an entire street block. It is bounded to the south by Great Russell Street, to the north by Bedford Avenue, to the east by Adeline Place and to the west by Tottenham Court Road.





- 2.2 The application relates to the basement of this building above, which is currently used as a car park providing 140 off-street parking spaces at basement levels -4 and -5.
- 2.3 The site entrances are located on Great Russell Street and Adeline Place. Tottenham Court Road is approximately 80 metres west of the junction of Great Russell Street and Adeline Place, and Bloomsbury Street is approximately 150 m to the east.
- 2.4 The site is surrounded by hotels, offices and small retail developments, with major retail on Tottenham Court Road. Immediately above the site is St Giles Hotel which is accessed from Bedford Avenue. There is also a YMCA which is accessed from Great Russell Street, adjacent to the pedestrian entrance to the car park. To the east, there are hotels on Great Russell Street.
- 2.5 The existing building is not listed, and the site is not located within a conservation area. The site is however adjacent to the Bloomsbury Conservation Area and borders the Bedford Square/Gower Street and New Oxford Street/High Holborn/Southampton Row character areas. It should be noted that the site is not identified as contributing to either of these character areas.

- 2.6 The site is located within the Central Activities Zone (CAZ) as defined by the London Plan, and as such the surrounding area is characterised by a mix of uses including commercial, residential, cultural and leisure uses.
- 2.7 The application site has an excellent level of accessibility, illustrated by a Public Transport Accessibility Level (PTAL) of 6b, which is the highest possible rating. The site is within close proximity to Tottenham Court Road Station which will provide links via the new Crossrail line. In addition to this the site is also within close proximity to Goodge Street, Holborn and Russell Square Stations offering links to the Central, Piccadilly and Northern lines respectively.
- 2.8 The site is also easily accessible by bus, being within close proximity to Tottenham Court Road.
- 2.9 A Santander Cycle Hire Docking Station is located on Great Russell Street.
- 2.10 Further detail on the accessibility of the site is set out in the accompanying Transport Assessment.

3. Planning history

- 3.1 The application site has been the subject of three previous planning applications. The most recent is the refusal of planning permission in September 2013 (ref. 2013/5075/P) for the *“change of use of part ground floor and basement levels -4 and -5 from public car park (sui generis) to 166 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations along Great Russell Street and Adeline Place.”*
- 3.2 Prior to this, two applications were withdrawn by the applicant in July 2012 and October 2012 respectively for similar development proposals involving the change of use of basement levels -4 and -5 from car park (Sui Generis) to 175 bedroom hotel (Class C1).

(i) Previous refusal

- 3.3 A planning application (ref. 2013/5075/P) was refused on the 26th September 2014 for the following 8 reasons:

- Reason refusal 1 - ventilation:

“The applicant has failed to demonstrate that the ventilation equipment necessary to ensure acceptable amenity for future occupants can be wholly contained within the building. In the absence of such information the proposals are likely to have an unacceptable impact on the amenity of the occupants, the external appearance of the building and the character of the area, contrary to policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework and policies DP24 (Securing High Quality Design) and DP26 (Managing the Impact of Development on Occupiers and Neighbours) of the London Borough of Camden Local Development Framework Development Policies.”

- Reason for refusal 2 - sustainability:

“The applicant has failed to demonstrate that the proposals have been designed in accordance with the energy hierarchy (in particular with regard to stage 2 consideration of Combined Heat and Power) and would achieve a BREEAM level of “very good” and carbon reduction savings of at least 20% on an agreed baseline. In the absence of a S.106 legal agreement securing the necessary sustainability measures including a post completion BREEAM certification, the development would fail to make the fullest contribution to

the mitigation of and adaption to climate change, contrary to policies CS13 (Tackling Climate Change through promoting higher environmental standards) and CS19 (Delivering and Monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and Policies DP22 (Sustainable Development and Construction), DP23 (Water) and DP32 (Air Quality) of the London Borough of Camden Local Development Framework Development Policies”.

- Reasons for refusal 3 to 8 - lack of a S106 Agreement:

3.4 The officer's delegated report stated that Reasons for Refusal 3 to 8 could be overcome by agreeing mitigation in the form of a S.106 legal agreement.

(ii) Previous Consultation Responses to Refused Application

3.5 A number of public objections and a petition were received in response to the previous application, which we summarise below:

- Building Regulations - The proposal does not provide adequate fire egress;
- Principle of development - in terms of overdevelopment and inappropriate location;
- Design - Vents inappropriate for Bloomsbury Conservation Area;
- Basement Impact - Impact of basement on structure;
- Amenity - Unacceptable noise from operation of hotel and impact upon St Giles Hotel and the YMCA;
- Traffic, Transport, Parking and Servicing - Impacts resulting from the intensification of use;
- Poor standard of proposed accommodation;
- Waste - insufficient consideration of the amount of waste and servicing.

(iii) Pre-application Enquiry

3.6 In February 2015 a request for pre-application advice was submitted to Camden Council to address the Reasons for Refusal and neighbour objections set out above. The key revisions to the scheme – responding to the Council's reasons for refusal – and the Council's subsequent response can be summarised as follows:

- In order to address Reason 1 for Refusal, which related to ventilation equipment the applicant's consultants have produced a MEP Systems report. MEP services will be run within false bulkheads in the hallways leading to a large plant room.

The scale and location of all equipment in the proposed plant room is outlined within the plans.

- The pre app response from the council stated that the additional information provided demonstrated that all the necessary services can be contained within the building and that subject to the drawings and information stated above, Reason 1 for Refusal could be overcome.
- Reason 2 for Refusal related to Energy Strategy and BREEAM. Previously the BREEAM statement failed to demonstrate that the proposal would achieve BREEAM 'Very Good'. Consequently, the applicant has submitted revised sustainability reports which demonstrate that a 'Very Good' standard is achievable. In addition to this the Energy Strategy demonstrates that a 25% improvement on Part L of the 2013 building regulations can also be achieved.
- During pre-application discussions, it was agreed that the proposals cannot be served by a boiler. In addition to this it was suggested that the proposals should include a connection point for a district heat network to ensure that it could connect at a later date if a connection became available.
- It was agreed at pre application discussion that the Heads of Terms of a Section 106 agreement were sufficient.

4. The proposal

- 4.1 The planning application to which this statement relates seeks to optimise the development potential of 112a Great Russell Street with a new hotel in this highly accessible central London location. Permission for the change of use is sought for the following development:

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

- 4.2 A schedule of accommodation is as follows:

Existing gross internal areas

Use	G	-1	-2	-3	-4	-5	Total
Car park	163.1	26.8	26.8	26.8	3158.8	3197.8	6600.1
YMCA	6.1	7.9	7.9	7.9			29.8
YMCA plant					144.5	129.5	274.0
Communal escape stairs	70.2	36.4	55.2	38.4			200.2
Total	239.4	71.1	89.9	73.1	3303.3	3327.3	7104.1

Proposed gross internal areas

Use	G	-1	-2	-3	-4	-5	Total
Hotel	149.2	39.1	39.1	39.1	3158.8	3197.8	6623.1
Electricity substation	20.0						20.0
YMCA plant					144.5	129.5	274.0
Communal escape stairs	70.2	36.4	55.2	38.4			200.2
Total	239.4	75.5	94.3	77.5	3303.3	3327.3	7117.3

Summary of revisions to scheme

- 4.3 Following the refusal of planning application (ref. 2013/5075/P) and the conclusion of the subsequent pre-application enquiry, advice a number of revisions have been made to the scheme to address any outstanding officer comments. These are summarised below:

- The number of rooms has been reduced to 166. This includes 17 accessible rooms;
- A technical report and drawings have been produced to demonstrate the location and size of the ventilation equipment;
- BREEAM Report produced and assessed in line with the energy hierarchy;
- S.106 Agreement to address the following:
 - Car free development;

- Contribution for improving footways including the removal of redundant crossovers in Adeline Place;
- Environmental, public realm, walking and cycling improvement contribution;
- Considerate contactors scheme;
- Employment training strategy;
- Apprenticeships;
- Local Procurement Code;
- Open Space contribution;
- Infrastructure to all for option to connect to CHP

5. Planning considerations

(i) Land use / principle of development

(a) Loss of existing use

- 5.1 The proposals involve the change of use of the existing car park (sui generis) to C1 use. The loss of the car park is considered acceptable as it is located within an area with an excellent level of public transport accessibility (PTAL 6B). It is therefore considered that the proposals are in conformity with Policy CS11 as the proposals would result in the promotion of sustainable travel.

This principle has been considered previously by the Council, and the loss of a car park in this location is not resisted by Development Plan Policy. The Council state:

There is no objection in principle to the loss of the public car park for the following reasons:

- *The site is located in an area with an excellent level of public transport accessibility. The reduction of public car parking would thus promote travel by sustainable means in keeping with the requirements of CS11 'Promoting sustainable and efficient travel'.*
- *The proposal would not affect parking arrangements for cyclists, people with disabilities, service vehicles, coaches or taxis and as such would not have an impact on those more desirable forms of parking.*
- *There are other private car parking options in the vicinity of the site that would cater for those who still felt it necessary to drive to the area.*
- *The proposal would not have an impact on existing on-street car parking spaces as the area is fully restricted by Controlled Parking Zones (CPZ).*
- *Given the alternative availability of parking in the area, and the high transport accessibility, the loss of these car parking spaces is not considered to have a material impact on the viability or function of businesses in the area. As such the proposal is not considered to be contrary to CS7 'Promoting Camden's Centres and Shops' or CS8 'Promoting a Successful and Inclusive Camden Economy'.*

(b) Proposed hotel use

- 5.2 London Plan Policy 4.5 (London's Visitor Infrastructure) states that the Mayor will, and boroughs and relevant stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors

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- and seeking to improve the range and quality of provision especially in outer London. The plan seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10 per cent should be wheelchair accessible; and to ensure that all new visitor accommodation is in appropriate locations such as within the Central Activities Zone (CAZ).
- 5.3 At a regional level there is a clear steer for the provision of hotel accommodation in the location of the development site i.e. close to central London and international and national transport termini.
- 5.4 This strategic approach is reflected at a local level whereby Policy CS1 (Distribution of Growth) seeks to promote a concentration of development in the Tottenham Court Road Growth Area and in other highly accessible locations.
- 5.5 Policy CS9 of the Camden Core Strategy recognises that in order to achieve a successful central London economy, the Council supports future growth in hotels as well as seeking to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area. This is re-iterated in Core Strategy Policy CS8 which recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.
- 5.6 Additionally, Policy DP14 (Tourism Development and Visitor Accommodation) of Camden Council's Development Policies DPD allows the Council to support tourism development and visitor accommodation by expecting new, large-scale tourism development and accommodation to be located in Central London, particularly the growth areas of Tottenham Court Road, King's Cross, Euston, and Holborn.
- 5.7 Given the site's location within the Central Activities Zone on the edge of the Tottenham Court Road Growth Area and alongside transport hubs, the area is well connected to central London. It is clear that the application site is in a sustainable and highly accessible location where the provision of hotel accommodation should be encouraged. A hotel in this location would constitute sustainable development of underutilised land as well as enhancing and promoting London's visitor infrastructure, thus contributing to the London Plan requirement of 40,000 net additional bedrooms by 2031.
- 5.8 Further to compliance with national and regional policy, a hotel in this location would also accord with LBC's development plan in principle as Policies CS1, CS9 & DP14 seek to direct land uses of this type to highly accessible areas. Overall, it is considered that the application site is in an excellent, sustainable and accessible location that would provide much needed hotel accommodation to improve London's tourism and business offer.
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- 5.9 As such, considering the thrust of policy set out above, it is recognised that this site is suitable for hotel development.
- 5.10 Residential accommodation is not appropriate within the -4 and -5 basement levels of this building. However, the provision of a hotel, whereby rooms can be artificially lit, is achievable. As such, a new hotel will bring additional life and vitality to this part of Camden. The hotel would result in new employment opportunities – creating 24 full time jobs – and would be an attraction for visitors to London, whether recreationally or professionally.
- 5.11 In conclusion, it is considered that the principle of a hotel in this location would be wholly compliant with national, regional and local policy and would provide an excellent facility within a highly accessible location.

Indeed, the principle of a hotel in this location has previously been agreed with the Council. The pre-application response (appendix 3) states:

There is no objection in principle to a hotel use in this location for the following reasons:

- *The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The proposal would help to achieve this goal.*
- *Local Planning Policy, including CS1 'Distribution of Growth', DP14 'Tourism Development and Visitor Accommodation' and FAAP Principle 8 identify the Tottenham Court Road area as a suitable place for hotel accommodation.*
- *The hotel would contribute to a successful and vibrant centre with a use that provides variety and choice and supports the continued growth of the sector and related employment in accordance with policies CS7 and CS8.*
- *The proposal would result in additional employment opportunities for local residents. In keeping with the requirements of policy CS8, employment training strategy, apprenticeships, and local labour and procurement would be secured via legal agreement if the application were to be recommended for approval.*
- *The NPPF seeks to promote a strong, responsive and competitive economy and as such the economic impact on existing hotels in the area is not considered to be relevant.*
- *A residential use, which would be the only other priority land use in this location, would not be acceptable underground.*

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- *If the Council were to consider approval of the scheme an appropriately worded condition would be recommended requiring the hotel to be retained as a single planning unit and for the purpose of short-term, temporary accommodation only.*

(ii) Design

(a) External changes, including materials

- 5.12 Due to the change of use of the building, there will be minimal alterations to the exterior of the building.
- 5.13 The main alterations to the exterior of the building will occur at the ground floor entrance areas on Great Russell Street and Adeline Place will match the existing. Materials proposed to be used include polyester powder coated metal framed windows and external doors and polyester powder crafted metal ventilation louvres.
- 5.14 Previously, the minor external changes to the building were considered acceptable and it was not considered that the development would impact on Bedford Square, due to its location.
- 5.15 With regard to plant, there was concern with the previous application that this would adversely impact upon the appearance of the building. In response to officer concerns the Air Quality Assessment confirms that the mechanical ventilation system will intake air from ground level, as there will be no access to the roof of the building.
- 5.16 It is also recommended that there is a planning condition relating to the provision and maintenance of an appropriate air scrubbing system.

(b) Internal alterations

- 5.17 The proposal involves the conversion of basement levels -4 and -5 into hotel accommodation with ancillary facilities such as reception area and lobby, linen store and plant rooms.
- 5.18 The existing entrance will be maintained, with the existing vehicular entrance to be used for servicing.
- 5.19 Vertical circulation within the building will be improved with the addition of two 23-person lifts, one of which will be a fire fighting lift. All existing stair cores will remain unchanged.
- 5.20 The guest rooms will comprise bedrooms with en-suite facilities. The following space standards will apply:

- Standard rooms - 11sqm including en suite; and
- Wheelchair Accessible rooms - 22sqm including en suite.

(c) Subterranean Development

- 5.21 The principle of basement development is considered acceptable. Basement development within this location will optimise the floorspace of a presently underutilised car park. As the site is within close proximity to a number of public transport hubs, the loss of the car park is considered acceptable.
- 5.22 With regards to previous comments surrounding the intensification of the use of the site, the location of the current car park is in a high PTAL location within the CAZ, within walking distance of public transport, shops, amenities etc. It is a location well-suited to a new hotel use. The proposal makes full and efficient use of the site in accordance with Camden Policy CS1. It is also important to note this did not form a reason for refusal. Indeed, Camden have previously advised the principle of the change of use is considered to be acceptable.
- 5.23 The application is accompanied by Basement Impact Assessment, in accordance with policy DP27.
- 5.24 Whilst the excavation is considered to be de- minimus in nature and in conformity with planning policy, it was advised during pre-application discussions that basement development has become an increasingly contentious issue with the Borough and as such to give members comfort the provision of a basement impact assessment would be advisable. As such the applicant is now submitting a Basement Impact Assessment.
- 5.25 The issue of 24 hour use was also raised as an issue with the previous application. It is not considered that C1 hotel use is any different to nearby residential uses in terms of access. It is considered that the CAZ is most suitable for 24 hour uses; however, as there are no ancillary facilities within the schedule of accommodation, it is highly unlikely that 24 hour access will occur. In line with DP16 and DP26, a draft Hotel Management Plan is now submitted with the application. It is not considered that there are any material amenity impacts that cannot be managed through a Hotel Management Plan.

(iii) Standard of accommodation

(a) Size & layout

- 5.26 The London Plan does not provide any guidance on minimum space standards for hotel accommodation.
- 5.27 As required by policies CS14 'Promoting High Quality Places and Conserving Our Heritage', SP24 'Securing High Quality Design' and DP29 'Improving Access' the proposal will provide 17 fully wheelchair accessible rooms achieving a total of 10% of rooms.
- 5.28 The ceiling height of the proposed development meets the standards considered acceptable for residential accommodation in the London Plan. The heights of the rooms are above minimum residential standards. Whilst the ceiling heights of the corridors are below 2.3m in places, this is considered acceptable due to the transitory nature of corridors.
- 5.29 Indeed, this has previously been considered acceptable by the Council and no objection has been raised. The pre-application response states:

In respect of ceiling heights, there are no prescriptive planning requirements for hotels. The proposed rooms would have headroom of 2.5m, in keeping with the standards normally considered acceptable for residential accommodation. While the corridors would have headroom of only 2.3m, as they are transitory spaces this is considered to be acceptable. As such the floor to ceiling heights are considered to be acceptable.

(b) Safety (fire)

- 5.30 Vertical circulation will be improved with the addition of two 23-person lifts one of which will be a fire fighting lift. All existing stair cores will remain unchanged.
- 5.31 Information on the acceptability of the design of the hotel accommodation, such as travel distances, is set out within the Fire Safety Report that accompanies this application. The hotel accommodation is proposed to be provided with an automatic fire alarm and detection system designed in accordance with BS5839 Part 1 to an L2 standard. Disabled refuge spaces will be provided for the hotel providing a place where disabled occupants can take refuge prior to being evacuated. It is proposed that these are provided with communication to management for evacuation purposes. A management plan will be developed by the building management.

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- 5.32 As the hotel operates on multiple basement levels it will be provided with firefighting shafts. Each shaft will incorporate a firefighting stair, smoke clearance and a dry main. A fire fighting lift will also be provided as appropriate for each firefighting shaft concerned. Based upon the above proposals it is considered that adequate measures are provided to meet the functional requirements of the Building Regulations.

(c) Amenity space to communal areas of hotel

- 5.33 The hotel includes a basement lobby which would act as a communal area for guests. The lobby has been designed to be capable of accommodating guests arriving and departing the hotel, ensuring small groups of people congregate on site and not on the surrounding streets.
- 5.34 Due to the nature of the hotel accommodation and its anticipated guests, it is not considered likely that the development will impact upon surrounding amenity space. There is much evidence to suggest that the primary users of compact hotel accommodation are individuals working in business, consequently compact hotels are mainly used as 'crash pads'.
- 5.35 Camden Development Plan Policy DP26 seeks to secure a good standard of amenity for all future occupants of buildings. Whilst the proposal does not provide any open space on site, it will provide a contribution via Section 106 agreement to Public Realm improvements. This is considered to mitigate any impact the development would have upon public open space, thereby being in line with Policy CPG8.
- 5.36 The council have previously said :

With regard to noise from patrons, the hotel includes a basement lobby which would act as a communal area for guests, thereby reducing the likelihood of congregation on the footpath. Hotels, particular those without bar or restaurants, are not normally considered likely to result in amenity impacts over or above any other Central London use. Given the London CAZ location and mixed use character of the area it is considered reasonable for hotel uses, and the associated noise from patrons, to operate in the area.

(d) Air quality

- 5.37 In relation to the refused application, there was concern raised as to the air quality of the hotel rooms, given that the ventilation air intake was at ground level.

The council have previously said in their pre-application advice:

While Adeline Place is likely the least polluted of the streets surrounding the building, concern is raised that the air quality would be below applicable residential standards (which are considered to be the most appropriate benchmark). As intake from the roof has now been discounted, due to a lack of access, the proposal includes a filtration system which will seek to remove particulate matter. Please provide details of the likely efficacy of such a system as well as details of maintenance. Details of maintenance should be included in the draft hotel management plan.

- 5.38 Significant work has been undertaken by the applicant's air quality consultant's Hoare Lea to demonstrate that the development can meet air quality targets.
- 5.39 The location of the air intake for the ventilation system is proposed to be from the Adeline Place façade at the ground level. Air quality on this façade is likely to be better than on other facades along busier roads, however, the annual mean, and potentially the 1-hour mean NO₂ objectives are not met at this location, although both PM₁₀ objectives are achieved.
- 5.40 The location of the air intake for the ventilation system is proposed to be from the Adeline Place façade at the ground level. Air quality on this façade is likely to be better than on other facades along busier roads, however, the annual mean, and potentially the 1-hour mean NO₂ objectives are not met at this location, although both PM₁₀ objectives are achieved. The annual mean objective does not apply at hotel facades, but given the risk that the one hour NO₂ objective may be exceeded it is recommended that filtration NO₂ scrubber is fitted to the air intake.

(e) Accessible rooms

- 5.41 London Plan Policy 4.5 (London's Visitor Infrastructure) states that the Mayor will, and boroughs and relevant stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision. The plan seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10 per cent should be wheelchair accessible; and to ensure that all new visitor accommodation is in appropriate locations such as within the Central Activities Zone (CAZ).
- 5.42 The hotel floors will provide 17 wheel chair accessible guest bedrooms rooms, representing 10% of the total rooms.

(iv) Amenity impact

(a) Noise & disturbance

- 5.43 A draft Construction Management Plan has been prepared which accompanies this application, which seeks to minimise the impact of the development to neighbours during construction. The developer will also participate in the Considerate Contractors Scheme.
- 5.44 As with the refused application, the resubmission is considered likely to have an acceptable impact on the amenity of adjoining and nearby properties. As an operating hotel, to enable repeat custom, it is in the operator's interest to ensure that patrons can enjoy a good night's sleep. In fact it is customary for such hotel's to offer a good night's sleep guarantee.
- 5.45 A draft Hotel Management Plan is submitted with this planning application, demonstrating how these mitigation measures will work in practice.

(b) Sunlight, Daylight and Privacy

- 5.46 Given the subterranean nature of the development, the change of use will not impact upon the levels of daylight and sunlight within the vicinity of the site. In addition to this, there will be no issues with loss of privacy due to the windowless nature of the hotel.

(v) Transport

(a) Vehicles (cars, coach drop-offs, taxis)

- 5.47 The hotel is proposed to be car free in line with policy DP18 'parking standards and limiting the availability of parking' and DP19 'managing the impact of parking'. It has been proposed that as there is a 'no parking zone' in front of the entrance, this can be used informally for taxi pick-ups/drop offs; a similar arrangement has been used for St Giles Hotel. This was previously considered acceptable.

(b) Pedestrians

- 5.48 Pedestrians can currently access the site via the entrance on Great Russell Street. This provides access to stairs and a lift to the basement car park levels at -4 and -5. There are footways on both sides of Great Russell Street, Adeline Place, Bedford Avenue and Tottenham Court Road and these roads are lit.

(c) Bicycle parking

- 5.49 A secure bicycle store off Adeline Place provides capacity for 16 bicycles in the form of 8 Sheffield Stands. An additional 20 spaces (10 stands) are provided within the footway on Adeline Place, within the development site boundary.
- 5.50 This is in line with Camden's bicycle parking standards (1 space per 500sqm for staff and 1 space per 500sqm for guests), and is in accordance with TfL's standards which require 1 space per 20 bedrooms for long stay parking and 1 space per 50 bedrooms for short stay parking (i.e. 13 spaces).
- 5.51 Furthermore, the site's excellent public transport links and proximity to Cycle Hire stations will place less demand on cycle parking provision and provides further sustainable transport options.

(d) Deliveries and servicing

- 5.52 It is proposed that the service entrance will be to Adeline Place, with the existing vehicular cross-overs removed.
- 5.53 As the hotel does not have a food and beverage offer, the number of deliveries and servicing trips are significantly reduced, on a typical day the hotel would generate one servicing movement. The maximum number of daily servicing trips to the site is at most predicted to be 3 visits.

(vi) Energy Strategy and BREEAM Pre-Assessment report

- 5.54 A BREEAM report has been produced, and assessed in line with the energy hierarchy; Be Lean, Be Clean and Be Green. The 'Be Lean' model demonstrates that the Building Emission Rate was less than the Target Emission Rate- this complies with Criterion 1 of the Building Regulations Approved Document Part L2A. This therefore demonstrates sufficient improvements to achieve an overall carbon emissions reduction of 25%, providing sufficient BREEAM ENE credits to achieve a BREEAM rating of 'Very Good'. This is a considerable achievement given that 'Be Green' options cannot be utilised due to the constraints of being underground. Thus, there is no available roof space or routes for connection for Photovoltaics, Solar Hot Water panels or building mounted Wind Turbines.

5.55 The building Emission Rate has been reduced by 25.9 kgCO₂/m²/year (45%) through the introduction of 'lean' design measures. As a result of this, the baseline building had a calculated energy consumption of 113Wh/m²/year, whereas the 'be lean' model was calculated to be 62kWh/m²/year which equates to a 45% reduction in energy consumption.

- In summary, the following design measures were implemented to achieve a 25% reduction in annual carbon emissions:
- Improved domestic hot water generator Seasonal Coefficient of Performance (SCoP);
- Improved lighting system- LED lighting;
- Improved Air Source Heat Pump specification;
- Use of EC/DC motors;
- Inverter drives on pumps and fans;
- Improved air handling specification, lower Specific Fan Power (SFP);
- Improved thermal envelope, Wall U Value= 0.2 W/m²K, Floor U Value= 0.22 W/m²K;
- Improved air tightness= 3m²/hr/m² @ 50pa

(vii) Waste

5.56 The proposed development is in line with Camden Planning Guidance which states that 1 cubic metre of storage should be provided for every 300-500 sqm of commercial use. Therefore, based on the size of the hotel, 17 cubic metres of waste storage is being propose within the service area.

(viii) Planning obligations / legal agreement

5.57 In response to the Officer's Report of the previously refused scheme, a draft S.106 agreement has been drawn up in response to Informative 3 of the Decision Notice. The proposed Heads of Terms were agreed to be acceptable during pre-application discussions:

- Car free development;
- Contribution for improving footways including the removal of redundant crossovers in Adeline Place;
- Environmental, public realm, walking and cycling improvement contribution;

- Considerate contactors scheme;
- Employment training strategy;
- Apprenticeships;
- Local Procurement Code;
- Open Space contribution;
- Infrastructure to all for option to connect to CHP

(ix) Previous consultation responses

5.58 The below provides a summary of consultation responses and the applicant’s response.

Category	Detail of Representation	Response
Building Regulations	The proposal does not provide adequate fire egress. Insufficient space within building for adequate service infrastructure.	See paragraph 5.30 above. A fire report has been submitted as part of this application.
Principle	Overdevelopment of hotel use on site, setting an undesirable precedent. Inappropriate location for 24 hour use, underground hotel inappropriate., negative economic impact on other businesses, no demand for hotels, current hotel on site has previously breached planning laws.	See paragraphs 5.11 and 5.22 above, and draft Hotel Management Plan. Principle is acceptable in planning policy terms, and has been agreed with the Council.
Design	Unacceptable design of frontages including vents at street level, the proposal has an unacceptable impact on the adjoining Bloomsbury Conservation Area.	See paragraph 5.12 above, and the D&A statement. Design is in keeping with host property and does not adversely affect nearby conservation areas.
Basement Impact	Impact on structure of building.	See paragraph 5. 21. A Basement Impact Assessment has now been produced, concluding that there will be no impact.
Amenity	Unacceptable noise from traffic, patrons, plant, servicing vehicles (servicing hours should be restricted), construction, and staff. Existing hotel on site already constitutes a statutory noise nuisance. Unacceptable impact on local air quality. Impact to the YMCA premises, lift passing	See paragraph XX above. Noise and disturbance will be mitigated through the recommendations of the draft Construction Management Plan and draft Hotel Management

	through the YMCA premises; loss of plant/electrical/water supply access via car park; effect upon electrical cabling during construction; effect of requiring relocation of YMCA mechanical/electrical plant; impact to waste water pumps and back-up pumps benefitting YMCA and St Giles Hotel and issue of flooding previously; effect upon existing mechanical plant for car park ; impact to emergency escape routes from the YMCA; noise/vibration from construction and impact on structure of building, waste odour.	Plan.
Traffic, Transport, Parking and Servicing	Impacts associated with intensification of drop offs, servicing and refuse collection, impact on pedestrians, loss of public car parking, congestion. Service vehicles should not use Adeline Place or Bedford Avenue.	Please refer to Transport assessment for acceptability of proposals.
Standard of Accommodation	Poor quality for future guests, due to absence of windows and low floor to ceiling heights.	Please refer to the D&A statement and previous pre-application advice on the design acceptability of the proposal.
Waste	Insufficient consideration of the amount of waste and servicing.	Please refer to Transport assessment for acceptability of proposals.

6. CONCLUSION

- 6.1 The proposal involves the change of use of the -4 and -5 basement car park levels of 112a Great Russell Street to a hotel, providing 166 rooms.
- 6.2 Following the refusal of planning permission in September 2014 the design team have worked to respond to these reasons for refusal, and a pre-application enquiry with the London Borough of Camden took place in March 2015.
- 6.3 Further design optimisation work has been undertaken following the conclusion of the pre-application enquiry, and the development responds to previous officer comments. The principal amendments are the number of hotel rooms proposed (reduced to 166 rooms) and supporting information demonstrating the building's sustainability credentials and technical MEP specifications.
- 6.4 There are a number of commercial and functional benefits to the redevelopment proposals of this basement car park, including:
- The sustainable reuse of a basement car park
 - Additional visitor accommodation to the Borough and to London
 - A highly sustainable location in terms of access to public transport
 - Employment generation
- 6.5 There will be no adverse impact in transport and highways terms, and careful management will ensure there is no adverse impact to nearby residential amenity.
- 6.6 The scheme has been amended following the previous pre-application advice sought from the Borough and the previous reasons for refusal. Please refer to the full suite of supporting information which accompanies this submission.
- 6.7 For all of the above reasons it is considered that planning permission should be granted.

APPENDICES

1. Decision notice dated 26 Sept 2014 (ref. 2013/5075/P)
2. Officer's delegated report (ref. 2013/5075/P)
3. Pre-application response dated 18 March 2015 (ref. 2015/1063/PRE)

APPENDIX 1

Decision notice dated 26 Sept 2014 (ref. 2013/5075/P)

GVA Planning
10 Stratton Street
London
W1J 8JR

Tel 020 7974 4444
Textlink 020 7974 6866

planning@camden.gov.uk
www.camden.gov.uk/planning

Application Ref: **2013/5075/P**
Please ask for: **Alex McDougall**
Telephone: 020 7974 **2053**

26 September 2014

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Refused

Address:
112A Great Russell Street
London
WC1B 3NP

Proposal:
Change of use of part ground floor and basement levels -4 and -5 from public car park (sui generis) to 166 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations along Great Russell Street and Adeline Place.

Drawing Nos: Location Plan, 580/PL100, 580/PL101, 580/PL102, 580/PL103, 580/PL200, 580/PL202, 580/PL203A, 580/PL210A, 580/PL215, 580/PL252B, 580/PL300, 580/PL301, 580/PL310, 580/PL600, 580/PL601, Design & Access Statement, Noise Impact Assessment H1616 v04, Planning Statement, Transport Statement, Waste Management Strategy 0001-UA004423-UP21R-01, Supplementary Transport Note, and Revised Energy Statement R20154/C Rev 4.

The Council has considered your application and decided to **refuse** planning permission for the following reason(s):

Reason(s) for Refusal

- 1 The applicant has failed to demonstrate that the ventilation equipment necessary to ensure acceptable amenity for future occupants can be wholly contained within the building. In the absence of such information the proposals are likely to have an unacceptable impact on the amenity of the occupants, the external appearance of



the building and the character of the area, contrary to policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 (Securing high quality design) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.

- 2 The applicant has failed to demonstrate that the proposals have been designed in accordance with the energy hierarchy (in particular with regard to stage 2 consideration of Combined Heat and Power) and would achieve a BREEAM level of 'very good' and carbon reduction savings of at least 20% on an agreed baseline. In the absence of a s106 legal agreement securing the necessary sustainability measures including a post-completion BREEAM certification, the development would fail to make the fullest contribution to the mitigation of and adaptation to climate change, contrary to policies CS13 (Tackling climate change through promoting higher environmental standards) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Sustainable design and construction), DP23 (Water) and DP32 (Air quality) of the London Borough of Camden Local Development Framework Development Policies.
- 3 The proposed development, in the absence of a legal agreement to secure a hotel management plan for the planning of deliveries, waste removal, servicing, pick-up and set-down by taxis, the discouragement of group bookings, sustainable workplace and visitor travel, and security (including CCTV) would be likely to contribute unacceptably to traffic disruption, would be detrimental to the amenities of the area generally, and would fail to contribute to an environment that is safe and secure as well as deter and monitor incidents of crime contrary to policies CS11 (Promoting Sustainable and efficient travel), CS17 (Making Camden a safer place) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (The transport implications of development) and DP17 (Walking, cycling and public transport), DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- 4 The proposed development, in the absence of a legal agreement securing the development as car free would be likely to add to pressure on on-street parking, congestion and pollution in area, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP18 (Parking standards and the availability of parking) and DP19 (Managing the impact of parking) of the London Borough of Camden Local Development Framework Development Policies.
- 5 The proposed development, in the absence of a legal agreement to secure the submission of, and implementation of, a Construction Management Plan, would be likely to contribute unacceptably to traffic disruption and dangerous situations for pedestrians and other road users, and would be detrimental to the amenities of the

area generally, contrary to policies CS11 (Promoting Sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.

- 6 The proposed development, in the absence of a legal agreement to secure improvement to the forecourt and adjacent public highway, including the removal of redundant vehicular crossings and reinstatement of the footpath in Adeline Place, would harm the function of pedestrian connections and the amenity of the area generally, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (The transport implications of development) and DP17 (Walking, cycling and public transport) of the London Borough of Camden Local Development Framework Development Policies.
- 7 The proposed development, in the absence of a legal agreement requiring a contribution to secure pedestrian and environmental improvements to be undertaken in proximity to the site would be likely to result in an unacceptable impact on the local transport infrastructure, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (The transport implications of development), DP17 (Walking, cycling and public transport) and DP21 (Development Connecting to the Highway Network) of the London Borough of Camden Local Development Framework Development Policies.
- 8 The proposed development, in the absence of a legal agreement to secure apprenticeships, an employment training strategy and local procurement measures would fail to contribute towards the creation of local employment and business opportunities, support local businesses and to contribute to the regeneration of the area, contrary to policies CS8 (Promoting a successful and inclusive Camden Economy) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy.
- 9 The proposed development, in the absence of a legal agreement securing public open space contributions, would be likely to contribute unacceptably to pressure on the Borough's open space facilities, contrary to policies CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Core Strategy and policy DP31 (Provisions of, and improvement to, open space and outdoor sport and recreation facilities) of the London Borough of Camden Local Development Framework Development Policies.

Informative(s):

- 1 The proposal does not consider the servicing requirements of other users within the existing building. It is recommended that any future application clearly demonstrate the location of existing services within the building that may conflict with the proposed use and how they would be accessed for servicing.
- 2 You are advised that signage shown on drawings would require separate advertisement consent and is not considered within the scope of this decision.
- 3 You are advised that the harm identified in Reasons 3 to 8 could be overcome by agreeing acceptable mitigation by way of a s106 legal agreement.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ed Watson', written in a cursive style.

Ed Watson
Director of Culture & Environment

APPENDIX 2

Officer's delegated report (ref. 2013/5075/P)

Delegated Report		Analysis sheet		Expiry Date:		12/11/2013	
		N/A		Consultation Expiry Date:		19/09/2013	
Officer				Application Number(s)			
Alex McDougall				2013/5075/P			
Application Address				Drawing Numbers			
112A Great Russell Street London WC1B 3NP				Refer to draft decision notice.			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
Change of use of part ground floor and basement levels -4 and -5 from public car park (sui generis) to 166 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations along Great Russell Street and Adeline Place.							
Recommendation(s):		Refuse planning permission					
Application Type:		Full Planning Permission					
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice					
Informatives:							
Consultations							
Adjoining Occupiers:		No. notified	09	No. of responses No. electronic	107 15	No. of objections	106
Summary of consultation responses:		<p>Site Notice 23/08/13 – 13/09/13. Press Notice: 29/08/13 – 19/09/13.</p> <p>Objections were received from the following properties: Nos. 43A, 48, 51, 66, 95B, 104, 104A, 111, 112, 113, 115, 117, 118, 121 Bedford Court Mansions; 16 South Road, Bishop's Stortford, Herts; St Giles Hotel; YMCA and an unspecified address.</p> <p>Objections were raised on the following grounds:</p> <ul style="list-style-type: none"> • <i>Building Regulations</i> – The proposal does not provide adequate fire egress. Insufficient space within building for adequate service infrastructure. • <i>Principle</i> - Overdevelopment of hotel use on site, sets undesirable precedent, inappropriate location for 24 hour use, underground hotel inappropriate, negative economic impact on other businesses, no demand for hotels, current hotel on site has previously breached planning laws. • <i>Design</i> - Unacceptable design of frontages including vents at street level, the proposal has an unacceptable impact on the adjoining Bloomsbury 					

	<p>conservation area.</p> <ul style="list-style-type: none"> • <i>Basement Impact</i> - Impact on structure of building. • <i>Amenity</i> – Unacceptable noise from traffic, patrons, plant, servicing vehicles (servicing hours should be restricted), construction, and staff. Note that existing hotel on site already constitutes a statutory noise nuisance. Unacceptable antisocial behaviour from drug use and sale of drugs. Unacceptable impact on local air quality. Impact to the YMCA premises, lift passing through the YMCA premises; loss of plant/electrical/water supply access via car park; effect upon electrical cabling during construction; effect of requiring relocation of YMCA mechanical/electrical plant; impact to waste water pumps and back-up pumps benefiting YMCA and St Giles Hotel and issue of flooding previously; effect upon existing mechanical plant for car park; impact to emergency escape routes from the YMCA), noise/vibration from construction, and impact on structure of building, waste odour. • <i>Traffic, Transport, Parking and Servicing</i> - Impacts associated with intensification of drop-offs, servicing and refuse collection, impact on pedestrians, loss of public car parking, congestion. Service vehicles should not use Adeline Place or Bedford Avenue. • <i>Standard of Accommodation</i> – Poor quality for future guests, due to absence of windows and low floor to ceiling height. • <i>Waste</i> – Insufficient consideration of the amount of waste and servicing. <p>In addition, a petition with 90 signatures was submitted by Bedford Court Mansions Limited raising objection to the impact on quality of life neighbouring residential occupiers for the following reasons:</p> <ul style="list-style-type: none"> • <i>Amenity</i> - Noise from passenger and servicing vehicles, plant and ventilation equipment, 24/7 operations, from patrons returning to the site or congregating in the early hours. • <i>Design</i> - Damage to the character of the Bloomsbury conservation area, a factor in the deterioration of the environment.
<p>Bloomsbury Association</p>	<p>The Bloomsbury Association objection on the following grounds:</p> <ul style="list-style-type: none"> • <i>Process</i> - Insufficient local consultation with adjoining and nearby occupiers from Council and Developer. Insufficient pre-application discussion with Council. • <i>Building Regulations</i> – The proposal does not provide adequate fire egress. Insufficient space within building for adequate service infrastructure. • <i>Principle</i> - Overdevelopment of hotel use on site, sets undesirable precedent, inappropriate location for 24 hour use, underground hotel inappropriate, negative economic impact on other businesses, no demand for hotels. • <i>Design</i> - Unacceptable impact on the adjoining Bloomsbury conservation area. • <i>Amenity</i> – Unacceptable noise from traffic, patrons, plant, servicing vehicles (servicing hours should be restricted), construction, and staff. Note that existing hotel on site already constitutes a statutory noise nuisance. Unacceptable antisocial behaviour from drug use and sale of drugs. Unacceptable impact on local air quality. Impact on pedestrians

	<ul style="list-style-type: none"> • <i>Traffic, Transport, Parking and Servicing</i> - Loss of public car parking, • <i>Sustainability</i> – The proposal does not satisfy Council’s sustainability criteria. • <i>Standard of Accommodation</i> –Lack of fire safety and poor air quality constitutes a threat to public health and safety.
TFL (Borough Planning)	<p>TFL makes the following comments:</p> <ul style="list-style-type: none"> • Cycle parking provision meets the minimum standard but further provision should be made for visitors/guests • Non-provision of hotel parking is welcomed • Travel plan for employees and guests recommended and secured through condition or obligation • Shower/changing facilities for employees should be provided • Delivery and Servicing Plan (DSP) to be conditioned prior to occupation • No servicing to be undertaken on Tottenham Court Road • Construction Management Plan (CMP) and Construction Logistics Plan (CLP) to be conditioned prior to commencement
TFL (Crossrail)	<p>The application has been considered and the authority does not have any comment.</p>
Cllr Adam Harrison	<p>Councillor Adam Harrison objects on the following grounds:</p> <ul style="list-style-type: none"> • <i>Principle</i> – Overdevelopment of site • <i>Design</i> – Vents at street level have unacceptable impact on appearance of building, character of area. • <i>Standard of Accommodation</i> – Underground hotel unsuitable for human habitation, even for short periods. • <i>Amenity</i> – Noise from plant and equipment. • <i>Sustainability</i> – Unacceptable level of ventilation required.

Site Description

The site is occupied by a large detached 20th century brutalist building bound by Great Russell Street to the South, Adeline Place to the East, Bedford Avenue to the north and Tottenham Court Road to the west.

The application relates to an existing public 5,267sqm basement providing 140 off-street public car parking spaces at basement levels -4 and -5 which is served by vehicle ramps from Adeline Place as well as pedestrian servicing/escape points at street level on Great Russell Street, Adeline Place and Bedford Avenue. It forms part of the existing building on site

The ground floor of the building is primarily comprised of A1, A2 & A3 uses. The YMCA sports facilities are accessed off of an entrance on Great Russell Street and extend into the other basement levels. The Bedford Avenue frontage is taken up by St Giles Hotel whose rooms occupy the upper floors in a series of tower elements. Servicing and access points are distributed around the building with the Adeline Place frontage dedicated to this purpose.

The site has the following additional characteristics:

- Although the application site is not listed and does not fall within a conservation area, the

Bloomsbury Conservation area borders the site to the north, east, and south along Bedford Avenue, Adeline Place and Great Russell Street respectively.

- Central Activity Zone (CAZ).
- Public Transport Accessibility Level (PTAL) of 6a 'excellent'.
- This section of Tottenham Court Road is a central London Frontage.
- The site directly adjoins a defined growth area in the Fitzrovia Area Action Plan (FAAP).
- The site is not located in an area of surface water flooding but is located in an area with a 1.33% chance of ground water flooding in any given year. In respect of Environment Agency flood maps, the property is outside of the defined floodplain for risk of flooding from rivers or sea, however, an exact flood risk category grade is not available for this individual site.

The area contains a mix of offices, residential and retail uses and there is a significant residential population in and around the area.

Relevant History

112A Great Russell Street (the application site)

2012/1825/P: Change of use of basement levels -4 and -5 from car park (Sui Generis) to 175 bedroom hotel (Class C1), creation of entrances from Adeline Place (doors and cladding) and Great Russell Street (canopy, entrance doors and ground floor extension to accommodate lift) and installation of metal gate onto Adeline Place. Withdrawn by Applicant 24/07/2012.

2012/3855/P: Change of use of basement levels -4 and -5 from car park (Sui Generis) to 175 bedroom hotel (Class C1), creation of entrances from Adeline Place (doors and cladding) and Great Russell Street (canopy, entrance doors and ground floor extension to accommodate lift) and installation of metal gate onto Adeline Place. Withdrawn by Applicant 02/10/2012.

In respect of comments by objectors concerning the St Giles Hotel, there have been planning applications in the last decade for various alterations at ground floor level as well as additions to the upper floors. There is also enforcement enquiry history related to the St Giles Hotel operation, it being noted that in most cases, there was no breach of planning control.

Relevant policies

National Planning Policy Framework 2012

National Planning Practice Guidance

London Plan 2011

London Housing SPG

Camden LDF Core Strategy 2010

CS1 Distribution and growth

CS2 Growth Areas

CS5 Managing the impact of growth and development

CS7 Promoting Camden's centres and shops

CS8 Promoting a successful and inclusive Camden economy

CS9 Achieving a successful central London

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

CS15 Protecting and improving our parks and open spaces and encouraging biodiversity

CS17 Making Camden a safer place

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the core strategy

Camden Development Policies 2010

DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

DP14 Tourism development and visitor accommodation

DP16 The transport implications of development

DP17 Walking, cycling, and public transport

DP18 Parking standards and limiting the availability of car parking

DP19 Managing the impact of parking

DP22 Promoting sustainable design and construction

DP24 Securing high quality design

DP25 Conserving Camden's heritage

DP26 Managing the impact of development on occupiers and neighbours

DP28 Noise and vibration

DP29 Improving access

DP31 Provisions of, and improvement to, open space and outdoor sport and recreation facilities

DP32 Air quality and Camden's Clear Zone

Camden Planning Guidance (updated 2013)

CPG1 Design

CPG3 Sustainability

CPG6 Amenity

CPG7 Transport

CPG8 Planning obligations

Fitzrovia Area Action Plan 2014

Assessment

Detailed Description of Proposed Development

The proposal is for change of use from a public car park (Use Class sui generis) to underground hotel (Use Class C1) with 166 rooms. 17 of the rooms (10.2%) would be wheelchair accessible. The total floor space would remain unchanged at 5,267m². The proposal would result in the loss of all 140 existing off-street car parking spaces, with none re-provided.

The following works are proposed:

- Internal fitout works at basement levels -4 and -5 including,
 - 149 standard hotel rooms (approx. 10sqm/room).
 - 17 wheelchair accessible rooms (approx. 14sqm/room).
 - 121sqm communal entrance hall (two storeys in height) with check in facilities, communal seating areas, internet stations and the like
 - 108sqm staff area including showering facilities, change rooms, staff room, kitchen, office and luggage store.
 - Associated service and storage areas. While it is not clear from the drawings, it appears that mechanical servicing for the rooms, including ventilation, would be in the wall space between the rooms.
 - The fit out works would appear to result in no further access between ground floor and basement levels via the existing vehicular access ramp.
- The proposal requires new internal ventilation running from the basement levels to the roof of the existing building. It is not clear from the drawings provided how this would be achieved.

- The proposal requires minor excavation at level -5 to provide lift underrun services. The additional excavation would have dimensions 5.7m (L) x 4.3m (W) x 1.35m (D), a total area of 24.5m² and volume of 33.1m³.
- Ground level alterations on Adeline Place including,
 - Converting the southern vehicular entrance to a cycle and waste storage area.
 - Infill existing vehicular entrances with new wall, air intake vents and doors.
- Ground level alterations on Great Russell Street including,
 - Converting the pedestrian access to the existing car park to the hotel entrance and lift foyer.
 - Replacement glazed aluminium framed shop front including double doors.
 - New cladding and fascia board for future signage.

During the course of assessment the proposal underwent substantial changes in response to concerns raised by the consultees and Council officers. The modifications include, but are not limited to, sustainability systems, internal design, and servicing areas. It was found that it would not be appropriate to ventilate the basement levels with air from street level as this air would be too polluted. Instead the Applicant proposed running vents to the roof of the St. Giles building.

The principal consideration material to the determination of this application and summarised as follows:

- Principle of development
- Design
- Basement
- Amenity Impact
- Standard of Accommodation
- Highways, Transport, Traffic, Parking & Servicing
- Waste
- Energy Efficiency and Sustainability
- Planning Obligations

Principle of Development

Loss of public car park

There is no objection in principle to the loss of the public car park for the following reasons:

- The site is located in an area with an excellent level of public transport accessibility. The reduction of public car parking would thus promote travel by sustainable means in keeping with the requirements of CS11 'Promoting sustainable and efficient travel'.
- The proposal would not affect parking arrangements for cyclists, people with disabilities, service vehicles, coaches or taxis and as such would not have an impact on those more desirable forms of parking.
- There are other private car parking options in the vicinity of the site that would cater for those who still felt it necessary to drive to the area.
- The proposal would not have an impact on existing on-street car parking spaces as the area is fully restricted by Controlled Parking Zones (CPZ).

- Given the alternative availability of parking in the area, and the high transport accessibility, the loss of these car parking spaces is not considered to have a material impact on the viability or function of businesses in the area. As such the proposal is not considered to be contrary to CS7 'Promoting Camden's Centres and Shops' or CS8 'Promoting a Successful and Inclusive Camden Economy'.

Hotel use

There is no objection in principle to a hotel use in this location for the following reasons:

- The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The proposal would help to achieve this goal.
- Local Planning Policy, including CS1 'Distribution of Growth', DP14 'Tourism Development and Visitor Accommodation' and FAAP Principle 8 identify the Tottenham Court Road area as a suitable place for hotel accommodation.
- The hotel would contribute to a successful and vibrant centre with a use that provides variety and choice and supports the continued growth of the sector and related employment in accordance with policies CS7 and CS8.
- The proposal would result in additional employment opportunities for local residents. In keeping with the requirements of policy CS8, employment training strategy, apprenticeships, and local labour and procurement would be secured via legal agreement if the application were to be recommended for approval.
- The NPPF seeks to promote a strong, responsive and competitive economy and as such the economic impact on existing hotels in the area is not considered to be relevant.
- A residential use, which would be the only other priority land use in this location, would not be acceptable underground.
- If the Council were to consider approval of the scheme an appropriately worded condition would be recommended requiring the hotel to be retained as a single planning unit and for the purpose of short-term, temporary accommodation only.

Overdevelopment, intensification of use

The proposal is not considered to represent overdevelopment or constitute an unacceptable intensification of use for the following reasons:

- The London CAZ is an area intended to be a focus for growth and the proposal seeks to make full and efficient use of the site including higher density development in accordance with Camden policy CS1 as well as London Plan 2011 policy 2.13 'Opportunity Areas and Intensification Areas'.
- In respect to concern about 24 hour operations, the proposal is located in the London CAZ and as such is within the most appropriate area for such uses. Furthermore, while hotels are 'open' at all hours of the day, they are comparable to a residential use in that this amounts to nothing more than people coming and going as they please. There is no space within the hotel for ancillary functions such as entertainment, bars, restaurants, conferences, weddings or the like, and as such the fact that patrons can come and go 24 hours a day is not considered likely to result in any material amenity impacts on adjoining or nearby properties that cannot be managed by a hotel management plan (see below for more information).
- The proposal is not considered to result in an unacceptable precedent as the proposal is unique and notwithstanding, all development is assessed on its own merits.

For the reasons listed above the proposal is considered to be acceptable in principle, subject to consideration of the matters below.

Design

Achieving high quality design and appearance as well as considering the impact upon the host building, street scene and the wider context, is a requirement of policies CS5 'Managing the Impact of Growth and Development', CS14 'Promoting High Quality Places and Conserving our Heritage', DP24 'Securing High Quality Design', DP25 'Conserving Camden's Heritage'.

Plant

Based on the location of the proposal underground and the significant number of potential occupants the proposal will require extensive servicing equipment, including ventilation ducts for clean air and smoke purging, fans, air exchangers, water piping, waste and storm water pumping equipment, fire egress, lighting and electricity cabling. While the existing smoke release ducts for the car park are *in situ* and shown on the plans, no details have been submitted as to the location or size of the other equipment. The floor plans simply have small 'servicing' pockets scattered across the floor plans. As such there is concern as to whether all of the proposed equipment will be located within the building and the implications on the appearance of the building if it cannot.

To overcome concerns relating to air quality, the proposed fresh air intake for the use would be located on the roof of the building, requiring extensive internal ducting. While the applicant has demonstrated that there is an internal ducting route possible, they have not outlined the extent of equipment that will be necessary to move air through the ducts. There is concern that implementation would require plant at roof level (to force air down to basement level) that would be visible from the street. By way of comparison, the plant required to extract air from even a modest commercial kitchen (at ground level) can be extremely voluminous. Any external equipment at roof level would likely have an unacceptable impact on the appearance of the building. As there is not sufficient information to demonstrate that the proposed development would have an acceptably impact on the appearance of the building or the character of the area the application is recommended for refusal. In this case it is not considered appropriate to impose a condition requiring details of such equipment as it may prove unfeasible for it to be contained within the building.

Ground floor frontages

The Fitzrovia Area Action Plan states that, "*any redevelopment of the St Giles Hotel should **improve** the street frontage, with the ground floor addressing the street and including active frontages along Tottenham Court Road and Great Russell Street. Blank frontages and large servicing areas should be avoided*" (emphasis added). The Great Russell Street pedestrian entrance would be replaced with a similar 'shopfront' with a new fascia board for future signage (not the subject of this application) which is considered to be acceptable subject to condition requiring detailed design information. The Adeline Place frontage is already 'service-based' in character. The proposal would replace existing vehicular entrances with walls, vents and doors to match the existing building. If approval were to be recommended a condition of consent would be included requiring matching materials be used and a financial contribution would be sought to remove the crossovers and reinstate the kerb and pavement.

In respect to objector's comments about possible impact to the character and appearance of Bedford Square, the combination of separating distance and discrete location at the ground floor means there is no impact identified.

Basement

The proposal includes additional excavation at Level -5. The application is not accompanied by a Basement Impact Assessment (BIA), as normally required by DP27. However, the proposed additional excavation of 33.1m³ would represent an additional 0.1% compared to the existing

35,000m³ basement. As such the excavation is considered likely to have negligible additional impact when compared to the existing building and the lack of a Basement Impact Assessment is not considered to be reason to refuse the application.

Amenity Impact

Consideration of any amenity impacts to neighbours is a requirement of policy CS5 'Managing the Impact of Growth and Development', CS9 'Achieving a Successful Central London' and DP26 'Managing the Impact of Development on Occupiers and Neighbours'.

Construction Impacts

The proposal is not considered likely to have unacceptable construction impacts for the following reasons:

- There is sufficient on-street space along Adeline Place to ensure work is carried out without significant adverse effect to the operation of the public highway. A separate license would need to be sought from Highways Management for any required hoardings, skips or materials storage on the highway.
- The area to be fit out currently benefits from vehicular access, albeit it from small vehicles only, which can be used to minimise the impact on the public domain.
- Based on the difficulty of the works a Construction Management Plan and participation in the Considerate Contractors Scheme would be secured by way of a legal agreement, in order to mitigate harm to the transport network, If approval were to be recommended in accordance with DP16 and an informative would be included noting the applicants requirements with regard to the Control of Pollution Act 1974.

Operational Noise

The operation of the proposed hotel is considered likely to have an acceptable impact on the amenity of adjoining and nearby properties for the following reasons:

- With regard to noise from patrons, the hotel includes a basement lobby which would act as a communal area for guests, thereby reducing the likelihood of congregation on the footpath. Hotels, particular those without bar or restaurants, are not normally considered likely to result in amenity impacts over or above any other Central London use. Given the London CAZ location and mixed use character of the area it is considered reasonable for hotel uses, and the associated noise from patrons, to operate in the area.
- Servicing would take place on Adeline Place. The proposal would replace the existing car park use and as such would likely result in net decrease in vehicular movements. Notwithstanding, if approval were to be recommended, servicing times would be limited by the hotel management plan secured by way of legal agreement.
- Noise and disturbance attributable to taxis and minicabs would be primarily restricted to the Great Russell Street frontage, away from the majority of nearby residential uses. Furthermore, any impact is balanced by the reduction in private vehicular trips with the ceasing of the public car park use and ensuring that the hotel is car-free.
- In respect of any noise and general disturbance attributable to coaches, the applicant has agreed to include as part of a hotel management plan a declaration that large groups would not be booked and as such minimise the likelihood that coaches would visit the site.
- With regard to noise from mechanical plant, the report submitted with the application has adequately demonstrated that it would be possible for the proposal to comply with the requirements of DP28. Notwithstanding, a condition is recommended for a noise survey prior to occupation to ensure that the noise criteria of the plant is met. Also, a condition requiring noise

levels near to sensitive buildings to be less than existing background measurements would be included.

- Notwithstanding, if approval were to be recommended a Hotel Management Plan would be secured by way of a legal agreement, in order to mitigate harm to the transport network and amenity of adjoining properties, in accordance with DP16 and DP26. The specific requirements of the Hotel Management Plan are discussed throughout this report.

Air quality

The proposal includes a sufficiently sized and dedicated waste storage area and the applicant has submitted a waste management strategy which is considered to be adequate to ensure that the proposal would have an acceptable impact on the air quality of the area, in accordance with policies CS18 and DP32.

Servicing

Camden LDF policy CS13 states that development must avoid harm to existing drainage systems. The proposal would share the basement with the YMCA club which occupies Levels -1 to -3. The YMCA club have stated that the equipment necessary to service their use is accessed from within the proposed hotel. This equipment includes sewer pumps. If these pumps fail it could, and has in the past resulted in the flooding of lower levels. The proposal does not adequately demonstrate how access for the maintenance of this equipment would be maintained. While this is considered to be a serious deficiency, it is a private matter between the applicant and the YMCA. As such an informative will be included recommending that this be considered as part of any future application if the current application is refused.

Other matters

It is noted that there are no issues for neighbours in respect of privacy, overlooking, loss of light or outlook posed by the external changes.

Concern was raised from objectors as to the impact of staff loitering around the service area on Adeline Place. The proposal includes a wide variety of facilities for staff at basement level which is considered to be sufficient to reduce the number of staff outside the building to those who need to smoke. Given the vibrant character of the area the proposal is not considered likely to result in a material increase in the number of people loitering at street level.

In respect of policy CS17 'Making Camden a Safer Place' it is considered that the proposal would not unacceptably impact safety, security, illegal drug use/sale or other crime in the area. Furthermore, any issues to do with crime and antisocial behaviour are a matter separate to planning and dealt with under criminal law.

Standard of Accommodation

It is a core planning principle of the NPPF (Paragraph 17), the London Plan (Policy 4.5), and the LDF (Policy DP26) to seek to secure a good standard of amenity for all future occupants of buildings.

In respect to objections about the hotel being underground and not benefitting from windows, there is no prescriptive planning policy or guidance precluding hotels in basements in terms of principle or amenity. Camden Policies DP22 and DP24 only refer to development being comfortable. Further, CPG6 'Amenity' which refers to the BRE 'Site Layout Planning for Daylight and Sunlight' (Oct 2011) is generally applied to residential (Class C3) situations only. Further still, in the exceptional instances where authorities may consider it appropriate to apply the standards to non-domestic buildings where

occupants have a “reasonable expectation” of daylight which may include hotels, this is for the purpose of protecting an existing neighbour from impact and not for considering the new building and its future occupiers. Furthermore, the BRE standards are guidance only. As such, there are no reasonable grounds on which to refuse the scheme on the principle of its underground location and lack of windows. Ultimately it would be up to prospective visitors to decide whether such rooms provide sufficient amenity for short stays.

There was some concern raised initially as to the air quality of the proposed hotel rooms given that the ventilation air intake was at ground level. However, the applicant provided confirmation that the air would be sourced from roof level. As such the air quality of the proposed use is considered to be acceptable, subject to a condition that the air be sourced from the roof as shown on the proposed plans.

However, as stated above, the applicant has not demonstrated that it is feasible to draw air from the roof without significant external plant. As plant may be necessary to ventilate the basement space; the lack of such equipment would render the basement uninhabitable. This is considered to be reason to refuse the application.

In respect of ceiling heights, there are no prescriptive planning requirements for hotels. The proposed rooms would have headroom of 2.5m, in keeping with the standards normally considered acceptable for residential accommodation. While the corridors would have headroom of only 2.3m, as they are transitory spaces this is considered to be acceptable. As such the floor to ceiling heights are considered to be acceptable.

Securing the safety of occupants is considered to be relatively simple in this case, subject to CCTV, access control for the entrance, controlling the reception foyer and lifts with fob access, safes in each room for patrons and ensuring waste room doorways are self-closing and locking. These details should be included in a hotel management plan, which would be secured by way of legal agreement were the application to be recommended for approval.

In respect of access for people with a disability as required by policies CS14 ‘Promoting High Quality Places and Conserving Our Heritage’, DP24 ‘Securing High Quality Design’ and DP29 ‘Improving Access’, the proposal provide 17 fully wheelchair accessible rooms and thus achieves the target of 10% of total rooms. The accessible rooms proposed are sufficiently sized and arranged to accommodate wheelchair users. The proposed hotel is accessed by two passenger lifts which are considered to be adequate given the scale of the proposed hotel. There is insufficient information in respect of entrance thresholds to ensure access to the hotel for wheelchair users. Should approval be granted it is recommended that conditions be included requiring an accessibility management plan be provided prior to construction and that the accessible rooms and lifts be provided prior to occupation and maintained in perpetuity.

The proposal does not provide any open space on site. Future occupants would seek open space alternatives in the vicinity of the site. The proposal would thus result in an increase in demand for public open space. As such it is considered necessary to secure a financial contribution by way of legal agreement toward the provision and maintenance of public open space in line with CPG8 if approval were to be recommended.

Several objectors raised concern relating to fire egress from the hotel. This is a building control matter not specific to the planning process. The applicant would need to demonstrate acceptable fire egress to operate.

Highways, Transport, Traffic, Parking & Servicing

London Plan (Chapter 6) and Camden policies CS9 'Achieving a Successful Central London' and C11 'Promoting Sustainable and efficient Travel' seek to promote sustainable transport including walking, cycling and public and improvement to streets and places

The application is supported by a Transport Assessment although no draft travel plan has been supplied in accordance with the abovementioned policies and DP16 'The Transport Implications of Development'.

Access and Servicing

The main visitor access is via Great Russell Street. The proposal includes dual doors which swing out. As the doors are between two supports of the building they are not considered likely to unacceptably impede pedestrians. There is a 'no parking zone' directly to the front of the entrance that could be used informally for taxi pick-up/drops-offs, which would be similar to the arrangement employed by the St. Giles Hotel, on Bedford Avenue.

The service entrance would be to Adeline Place. Both existing vehicular cross-overs would be removed. A planning obligation for removal of the redundant crossing in accordance with the abovementioned policies as well as DP16 'the transport implications of Development', DP17 'Walking Cycling and Public Transport'. While no openings to the site exist on Tottenham Court Road, due to the high traffic nature of that road it is considered appropriate to include a condition if approval is recommended to restrict servicing on that frontage.

The proposed hotel servicing would be on-street. The TA indicates deliveries would be between 0700 to 1800hrs every day including Sundays and bank holidays. Linen related deliveries would be daily and vending machines twice weekly. There is a loading bay on Bedford Avenue. A recent appeal decision for a hotel in the area at Brook House (Refs: APP/X5210/A/13/2207166 & APP/X5210/E/13/2207168) found that on-street servicing of a hotel would not cause any material harm to the living conditions of local residents. It appears that on-street servicing is a common arrangement for hotels in the area and there is sufficient space to allow it. Notwithstanding, delivery, waste and servicing planning would be secured as part of a hotel management plan by planning obligation if the council were to consider approval.

Parking

The hotel proposes no parking and if Council was to consider approval, an obligation would be required for the scheme to be car free in accordance with policies DP18 'Parking Standards and Limiting the Availability of Parking' and DP19 'Managing the impact of Parking'. Again, this is considered to be appropriate given the high PTAL of the site, and the policy objective of encouraging walking and cycling.

Having regard to London Plan cycle parking standards in Table 6.3, and Camden policy DP18/DP Appendix 2, 10 secured and sheltered spaces should be provided for employees. The proposal includes a cycle storage area to the service entrance on Adeline Place with space for 18 cycle parking spaces. The requirement for cycle parking for visitors is not considered necessary owing to the central London location and proximity of public cycle hire stations. As such the proposal is considered to provide appropriate cycle parking facilities. If approval were recommended, a condition would be included requiring that the bicycle spaces be provided as shown on the plans and maintained in perpetuity.

Trip generation and public transport impact

The Transport Statement (TS) provided with the application predicts that the majority of trips to the

site would be by walking or public transport, estimated at 79% of all trips. Based on the increased pedestrian movements it is considered reasonable to require public realm improvements be secured by way of financial contribution were the application to be recommended for approval. In order to maximise the use of sustainable forms of transport it is considered appropriate to require workplace and visitor travel planning as part of a hotel management plan to be secured by legal agreement if the council was to consider approval.

The TS demonstrates that the number of car and taxi trips generated by the proposal would be less than that of the existing car park and as such are considered to have an acceptable impact on traffic.

Although, no information is provided in respect of public transport demand compared to available capacity, it is considered that it could be accommodated given the high PTAL in this central London location.

The Fitzrovia Area Action Plan states that, *“the Council will expect visitor accommodation to be accessed primarily by public transport and will seek to use planning conditions and/ or legal agreements to secure transport management plans. The Council will expect transport management plans to control pick-up and set-down by taxis and coaches”*. In this case it is considered that the transport management elements can be included as part of a wider hotel management plan, which would be secured by way of legal agreement were approval to be recommended.

Construction period

Given the scale of the works, location of the site, the site constraints and proximity of residential properties it is considered that a Construction Management Plan (CMP) should be provided prior to construction to minimise the impacts of the fit out works. As the proposal would likely require vehicles parking offsite it is considered that the CMP should be secured by way of legal agreement, to ensure that the Council has the ability to review and seek amendment to the CMP during the construction process. As such a CMP would be secured by way of legal agreement if the application were to be recommended for approval.

Waste

The proposal includes repurposing part of the existing ground floor south car park entrance on Adeline Place as a waste storage area. Camden planning guidance requires that 1 cubic metre of storage space be provided for every 300-500sqm of a commercial use. As the proposal is for a hotel use it is considered that the waste generation would be to the high end of this spectrum. Based on the size of the hotel, the proposal should provide 17 cubic meters of waste storage area. The waste storage area would have a floor area of approximately 17sqm and a floor to ceiling height of 2.4m and as such is considered to be acceptable. The waste area is considered to be adequately separated from the adjoining residential flats on the eastern side of Adeline Place so as not to have an unacceptable odour impact. The issue of the collection of waste is considered in the Servicing section above.

Should approval be granted it is recommended that a condition be included requiring that the waste storage area be provided prior to occupation and maintained thereafter.

Energy Efficiency & Sustainability

Camden policy CS13 seeks to reduce the effects of and adapt to climate change, produce energy locally, use water efficiently, reduce the potential for flooding, and reduce carbon emissions.

Energy

The London Plan requires development to make the fullest contribution to climate change mitigation. This includes minimising CO₂ emissions according to Policy 5.2 as well as requiring a range of measures to be incorporated into schemes pursuant to Policies 5.9-5.15. The overall approach to energy should be in line with the Mayor's Energy Hierarchy (i) using less energy ('be lean'); ii) supplying energy efficiently ('be clean'); iii) using renewable energy ('be green'). This approach is reflected in Council's policies CS13 'Tackling Climate Change through Promoting Higher Environmental Standards' as well as DP22 'Promoting Sustainable Design and Construction' and DP24 'Securing High Quality Design'.

In addition to following the approach of the energy hierarchy, CPG3 requires that 20% of the total CO₂ reduction be achieved through the use of on-site renewable technologies. The application includes an energy statement which concludes that a 31.2% reduction in CO₂ emissions would be achieved. However insufficient information has been provided to demonstrate how the baseline and predicted CO₂ emissions have been calculated making it impossible to verify the proposed CO₂ emissions reduction (see 'be green section for further detail).

Be Lean

In line with the first element of the hierarchy the energy statement outlines the passive energy savings measures to be employed. Those include, but are not limited to, the following:

- The proposal would not be affected by weather conditions such as solar gain as it is located underground with no windows.
- The proposal would be highly insulated naturally as there are minimal exposed facades.
- Measures would be taken to reduce air leakage.
- Heat recovery systems on the ventilation systems

While the energy statement does not seem to indicate how far these measures would reduce CO₂ emissions below the stated baseline, given the floors are below ground the passive measures proposed are considered to be sufficient.

Be Clean

With regard to the second element of the hierarchy and Council's CPG3 'Sustainability' the Applicant is asked to demonstrate that they have considered the viability of connecting to an existing or proposed Combined Heat & Power (CHP) network. The site is within a 1km radius of both the Euston Road network and University College London network and is within 500m of the future British Museum network. The applicant does not adequately consider the possibility of connecting to an existing or planned CHP network as no evidence or correspondence with the network operators has been provided. The feasibility of CHP on site has been ruled out by Council due to the lack of acceptable means of ventilating the equipment without unacceptable impacts on air quality. As the applicant has not reasonably demonstrated that a connection to CHP is unviable, and as a legal agreement would normally be required to ensure such a connection took place if it were viable, the lack of information is considered to be reason to refuse the application.

Be Green

With regard to the third element of the hierarchy CPG3 requires that 20% of the CO₂ reduction be achieved through the use of on-site renewable technologies.

The energy statement dismisses the possibility of any roof mounted solar renewable technologies citing lack of service access to the roof. However, such access appears to be proposed to ventilate

the building. As such it does not follow that access could not be made for roof mounted renewable equipment.

The energy statement commits to achieving the 20% savings through the use of high efficiency air-source heat pumps. While this is acceptable, and technically feasible in principle, were the proposed ASHP models to be installed, the applicant has not provided calculations using recognised calculation methodology, or produced BRUKL reports for the 'before ASHP' and 'after ASHP' scenarios, to demonstrate the claimed CO₂ reduction would be achieved.

Sustainability

Energy is not the only element that determines the sustainability of a building. Other factors include, but are not limited to, water use, materials, waste, transport and pollution. CPG3 requires that such proposals include an assessment demonstrating that the scheme adequately minimises resource use by meeting a minimum 'very good' BREEAM standard. A BREEAM assessment has not been provided.

Overall, insufficient information in respect of BREAAM, viability of connection to CHP and a scheme that fails to demonstrate that the target CO₂ reduction can be met is not considered acceptable. It is not considered that these matters can be resolved by way of conditions or legal agreement due to the constraints imposed by an underground use. As such, this represents a reason for refusal being contrary to the abovementioned policies and guidance.

It should be noted that the applicant was provided with several opportunities to provide the necessary evidence and information. However, it was not forthcoming in a timely manner.

Planning Obligations

In the case of an approval and accordance with CS19 'Delivering and Monitoring the Core Strategy' and CPG8 'Planning Obligations', the following obligations would be sought in support of ensuring the development is sustainable, to meet the particular needs and requirements for the operation of the scheme and to mitigate identified impacts to make the scheme acceptable in accordance with Circular 11/95:

- Car-free
- Hotel Management Plan (including, but not limited to, planning deliveries, waste removal, servicing, pick-up and set-down by taxis, group bookings, workplace and visitor travel and security including CCTV)
- Construction Management Plan
- Contribution for improving footways including removal of redundant crossovers in Adeline Place
- Environmental, public realm, walking and cycling improvement contribution
- Considerate Contractors Scheme
- Employment training strategy
- Apprenticeship: 1 no. per £3m build cost plus £1,500 per apprentice
- Local Procurement Code if value >£1m
- Open space contribution of £16,842.60
- Infrastructure to allow for option for connection to CHP network

Note that separate approval licenses may be necessary in respect of works affecting the public highway. Also, the above heads of term are separate and exclusive of any further approvals with respect of s278 of the Highways Act or and financial contributions for monitoring costs.

CIL

The proposed floor space may be liable to the Mayor's Community Infrastructure Levy (CIL). The contribution for developments within Camden is set at £50 per square metre. As such this development may be liable for a contribution of £263,350.00 (5,2676sq.m x £50). However, it is noted that the applicant may seek an exemption based on existing floorspace in use. A standard informative is attached to the decision notice drawing CIL liability to the Applicant's attention.

Conclusion

The proposal is considered to be unacceptable for the following reasons:

- In the absence of information demonstrating that the necessary ventilation equipment can be wholly contained within the building, the proposal could have an unacceptable impact on the appearance of the building and the character of the area. Furthermore, if such equipment were not provided, the proposal would provide an unacceptable standard of accommodation.
- In the absence of information demonstrating that the proposal has fully complied with the requirements of the energy hierarchy, has not provided any baseline standard on which to test the sustainability of the building, and without an appropriate BREEAM assessment, the proposal fails to maximise its sustainability.
- Given the lack of an appropriate legal agreement, the necessary contents of which are outlined in this report, the proposal would fail, on balance, to be acceptable. It is noted however that this reason could be overcome with an appropriate agreement.

It is considered that the first two outstanding issues raised above cannot be addressed by way of detailed conditions because they are fundamental to the assessment of the application.

Recommendation

Refuse Planning Permission

APPENDIX 3

Pre-application response dated 18 March 2015 (ref. 2015/1063/PRE)

Date: 18/03/15
Your ref: N/A
Our ref: 2015/1063/PRE
Contact: Alex McDougall
Direct line: 020 7974 2053
Email: Alex.McDougall@camden.gov.uk

**Advice and Consultation
Planning and public protection**
Culture & environment directorate
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WC1H 8EQ

Mr. Tom Edmunds
GVA Planning
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W1J 8JR

Tel: 020 7974 5613
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planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Mr Edmunds

Re: Pre-application advice relating to the proposed change of use from car park to hotel at 112A Great Russell Street, London, WC1B 3NP
Drawing No(s): 2897/P/01/A, 2897/P/02/A, 2897/P/03/A, 2897/P/04/A, 2897/P/05, 2897/P/06, 2897/P/07, 2897/P/08, 2897/P/11/C, 2897/P/12/A, 2897/P/13/A, 2897/P/14/A, 2897/P/15/C, 2897/P/16/C, 2897/P/17/B, 2897/P/18/A, 2897/P/19, LDN001_01A, 1441010-HL-XX-B4-GA-M-570-7004-P1, 1441010-HL-XX-B5-GA-M-570-7005-P1, 150110-SK001-P1, 1441010-HL-XX-B4-GA-M-570-7004-P3, 1441010-HL-XX-B5-GA-M-570-7005-P3, Drainage Strategy by Pinnacle dated February 2014, Overview of Proposed Mechanical and Electrical Systems by Hoare Lea undated, Energy and Sustainability Strategy Overview Rev: A, by Hoare Lea dated January 2015, Energy Part L Compliance and BREEAM Assessment Rev: A by Hoare Lea dated February 2015, BRUKL Output Document dated February 2015, Air Quality Memorandum by Hoare Lea dated February 2015, and Draft Transport Statement by Transport Planning Practice dated February 2015.

Thank you for your enquiry received on 20/02/15 regarding the proposed change of use of part ground floor and basement levels -4 and -5 from public car park (sui generis) to 226 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations along Great Russell Street and Adeline Place.

Background

The site is occupied by a large detached 20th century brutalist building bound by Great Russell Street to the South, Adeline Place to the East, Bedford Avenue to the north and Tottenham Court Road to the west.

The application relates to an existing public 5,267sqm basement providing 140 off-street public car parking spaces at basement levels -4 and -5 which is served by vehicle ramps from Adeline Place as well as pedestrian servicing/escape points at street level on Great Russell Street, Adeline Place and Bedford Avenue.

The ground floor of the building is primarily comprised of A1, A2 & A3 uses. The YMCA sports facilities are accessed off of an entrance on Great Russell Street and extend into

the other basement levels. The Bedford Avenue frontage is taken up by St Giles Hotel whose rooms occupy the upper floors in a series of tower elements. Servicing and access points are distributed around the building with the Adeline Place frontage dedicated to this purpose.

The site has the following additional characteristics:

- Although the application site is not listed and does not fall within a conservation area, the Bloomsbury Conservation area borders the site to the north, east, and south along Bedford Avenue, Adeline Place and Great Russell Street respectively.
- It is located within the Central Activity Zone (CAZ).
- The site has a Public Transport Accessibility Level (PTAL) of 6a 'excellent'.
- This section of Tottenham Court Road is a central London Frontage.
- The site directly adjoins a defined growth area in the Fitzrovia Area Action Plan (FAAP).
- The site is not located in an area of surface water flooding but is located in an area with a 1.33% chance of ground water flooding in any given year. In respect of Environment Agency flood maps, the property is outside of the defined floodplain for risk of flooding from rivers or sea, however, an exact flood risk category grade is not available for this individual site.

The area contains a mix of offices, residential and retail uses and there is a significant residential population in and around the area.

Relevant History

2013/5075/P: Change of use of part ground floor and basement levels -4 and -5 from public car park (sui generis) to 166 bedroom hotel (Class C1), including alterations to openings, walls and fascia on ground floor elevations along Great Russell Street and Adeline Place. Refused 26/09/14 (please see details below).

Assessment

The proposal is similar to that previous refused under planning application ref: 2013/5075/P. The primary difference is an increase in the size of the proposed hotel from 166 rooms to 226 (a 36% increase).

As per the previous application, the principle of the change of use is considered to be acceptable. The primary consideration is whether the proposal overcomes the reasons for refusal of the previous application. In addition, several additional concerns arise due to the proposed increased capacity of the hotel, namely:

- Amenity of Neighbouring Properties
- Standard of Accommodation
- Transport
- Waste

Reasons for Refusal

The following is the list of reasons for refusal of the previous application (2013/5075/P) and how the proposal responds:

1. *The applicant has failed to demonstrate that the ventilation equipment necessary to ensure acceptable amenity for future occupants can be wholly contained within the building. In the absence of such information the proposals are likely to have an unacceptable impact on the amenity of the occupants, the external appearance of the building and the character of the area, contrary to policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 (Securing high quality design) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.*

More detailed drawings and reports have been provided to demonstrate that all necessary services can be contained within the building. MEP services will be run within false bulkheads in the hallways leading to a large plant room. As such the proposal appears to have overcome this reason for refusal. You are advised to please outline the scale and location, as best as possible, of all equipment in the proposed plant room.

While not a reason for refusal of the previous application, significant concern was raised as to the ability of the development to accommodate, and provide sufficient access to, existing pumping infrastructure required by the YMCA. Please outline on the drawings all plant relating to the existing uses on the site, and show how access will be maintained to these areas for maintenance.

2. *The applicant has failed to demonstrate that the proposals have been designed in accordance with the energy hierarchy (in particular with regard to stage 2 consideration of Combined Heat and Power) and would achieve a BREEAM level of 'very good' and carbon reduction savings of at least 20% on an agreed baseline. In the absence of a s106 legal agreement securing the necessary sustainability measures including a post-completion BREEAM certification, the development would fail to make the fullest contribution to the mitigation of and adaptation to climate change, contrary to policies CS13 (Tackling climate change through promoting higher environmental standards) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Sustainable design and construction), DP23 (Water) and DP32 (Air quality) of the London Borough of Camden Local Development Framework Development Policies.*

A revised sustainability proposal has been submitted with the following details:

Energy strategy

- The proposal targets a 25% improvement on Part L 2013 building regulations. While this falls short of the London Plan target of 35% there is some flexibility for existing buildings. Please include details of the measures taken to achieve

the 25% level and why the full standard could not be achieved, including Part L modelling report setting out assumptions such as envelope U-values, system efficiencies, air source heat pump, COPs, etc. Post construction testing would be secured via legal agreement.

- Please provide regulated and unregulated energy demands in kWh/yr (broken down into use type – heating, hot water etc) and associated CO2 emissions at *each* stage of the energy hierarchy. Outputs of the ASHP (kWh/yr) and energy required to operate the heat pump should also be made clear.
- It is generally accepted that the proposal cannot be served by a boiler, as this would require a route for flues up the building which would cut through other premises. Please include details of the scheme's Part L performance compared with that of a scheme that would be served by gas boiler.
- District heating connection:
 - The existing Bloomsbury/British Museum and UCL networks may be too far from the site for a viable connection. However, the operators should be contacted to inquire as to any spare capacity, plans for expansion, and technical details such as operating temperatures and carbon content of heat. Details of distances and correspondence should be included with the application.
 - The project will have the ability to connect to future networks for space heating and domestic hot water, which is welcomed. Please provide details of this connection point, including location and type of heat exchanger and interaction with systems currently proposed.
- On site CHP has not been proposed on the basis that it is a relatively small scale project and would require flues up to the roof of the building (due to air quality concerns), which does not appear practicably achievable. While this is generally acceptable a justification summary for not including CHP should be included with the report.

BREEAM

- A pre-assessment has been completed demonstrating that a 'very good' standard is achievable. While this standard is in line with core policy, there is more recent guidance which aspires to the 'excellent' standard. The pre-assessment report should provide a short justification where credits are not achievable. Post construction testing would be secured via legal agreement.

3. – 9. *Legal Agreement*

It is noted that a legal agreement with the following heads of terms, and draft contribution figures, would also be required:

- Construction Management Plan (inc. Construction Logistics Plan)
- Hotel Management Plan (inc. Delivery and Servicing Plan)
- Workplace and Guest Travel Plan (inc. monitoring fee TBD)
- Car-free agreement
- Highways improvements contribution (TBD)
- Pedestrian and environment improvement contribution (TBD)

- Apprenticeships (1/£3mil build cost), employment strategy and local procurement
- Open space contribution (approx. £14,226.00)

Amenity of Neighbouring Properties

The increase in the number of hotel guests will lead to an increased number of trips to and from the site, both in terms of road and pedestrian traffic. While the previous application was not refused on the ground of amenity impact on adjoining properties the introduction of additional guests means that these impacts will need to be reconsidered. Significant objection was received to the previous application from the residential units opposite Adeline Place.

It is noted that the previous application sought to require a hotel management plan by way of condition. Due to the increase in the number of potential occupants it is considered that a draft hotel management plan and serving plan be provided at application stage which outlines the types of measures that will be imposed to reduce the impact on adjoining properties, such as, but not limited to: delivery and servicing plan and times, antisocial behaviour strategy, etc.

Standard of Accommodation

Size & Layout

As part of the assessment of the previous application there was much discussion as to the size of the hotel rooms. A size of 10sqm for standard rooms and 14sqm for wheelchair rooms was ultimately agreed. The current proposal has reverted to smaller room sizes, seemingly less than 9sqm, in order to accommodate additional rooms. While there are no standards for hotel room sizes, concern is raised as to the amenity provided by these smaller rooms.

Amenity Space

A contention with the previous application (as originally submitted) was a lack of communal amenity space where guests could gather internally, to minimise the likelihood that they would spill out into the street and create amenity impact on adjoining properties. The solution proposed was a two storey lobby area which would provide an alternative communal space for guests. The currently proposed communal lobby appears to be roughly the same size as that previously proposed. Given that the proposal results in a material increase in the capacity of the hotel it is considered that there should be a commensurate increase in the size of the lobby area (i.e. 36% increase).

Air Quality

The hotel would be ventilated from air sourced from ground level on Adeline Place. While Adeline Place is likely the least polluted of the streets surrounding the building, concern is raised that the air quality would be below applicable residential standards (which are considered to be the most appropriate benchmark). As intake from the roof has now been discounted, due to a lack of access, the proposal includes a filtration system which will seek to remove particulate matter. Please provide details of the likely efficacy of such a

system as well as details of maintenance. Details of maintenance should be included in the draft hotel management plan.

Accessible Rooms

The proposal would be required to provide 10% of all rooms as wheelchair accessible; in this case 23 rooms. As discussed above a minimum size of 14sqm was ultimately agreed to be acceptable as part of the previous application. Please note on the drawings the units which will be accessible and provide a detailed layout, similar to that provided for the standard rooms, which demonstrates how all appropriate dimensions will be achieved.

Transport

After significant discussion and revision all transport impacts, subject to a satisfactory legal agreement, were resolved during assessment of the previous application. However, the proposal now includes an additional 60 rooms, a 36% increase to the previous application, which will require reconsideration of the potential transport impacts.

Vehicular Traffic

During assessment of the previous application concern was raised that coach trips associated with the use would have an unacceptable impact on the traffic network in the vicinity of the site. The Transport Statement submitted fails to provide detailed information as to how the underground site will manage taxi and coach arrivals, merely stating that provision is available on-street for taxis and that there will be no coach arrivals. No analysis has been undertaken to support the statement that no coaches would arrive in connection to this hotel or how this would be enforced. Experiences within LB Camden suggest this statement to be unsubstantiated. A number of similar hotels operate in the borough and these often have coach arrivals to the site for large groups of travellers. This is of particular concern as the increased number of rooms being sought has a higher likelihood of attracting coach parties.

Furthermore, the West End Project, which will result in significant changes to how traffic can move around the site, has not been considered as part of the Transport Statement. The ability of taxis to drop off passengers to the front of the site may be compromised by the West End Project. An analysis of the impact of the West End Project on the proposed hotel should be included in the Transport Statement.

Pedestrian Traffic

The Transport Statement submitted does not fully address the cumulative impacts of the proposal on public transport capacity or pedestrian flows and pedestrian comfort levels. A Workplace and Guest Travel Plan should be submitted to detail how these increased movements will be managed or mitigated.

Please note that, as a matter of public safety, all external doors should open inwards as opposed to out into the pedestrian environment.

Cycle Parking

Please note that the cycle parking requirements have been updated since the submission of the previous application. The revised London Plan now seeks 1 space per 20 bedrooms for long stay and 1 space per 50 bedrooms for short stay. As such the proposal would be required to provide 16 spaces. It is noted that the proposal provides 16 spaces and as such is considered to be acceptable in this regard. Please provide change rooms, showers and lockers as part of the staff facilities to encourage cycling to work. Such details should be shown on the proposed drawings.

Servicing

The proposal seeks to service the site from Adeline Place. However, Adeline Place and the surrounding streets will be significantly affected by the West End Project. A draft delivery and servicing plan should be included with the application which responds to the changes proposed as part of the West End Project.

Waste

The additional capacity of the hotel will result in the generation of more waste. However, the revised drawings show a significant reduction in the size of the waste storage area. It is considered that the currently proposed waste area would not be sufficient for the proposed use and an alternative arrangement should be proposed. Camden planning guidance requires that 1 cubic metre of storage space be provided for every 300-500sqm of a commercial use. As the proposal is for a hotel use it is considered that the waste generation would be to the high end of this spectrum. Based on the size of the hotel, the proposal should provide 17 cubic meters of waste storage area.

Other

Basement

Camden LDF policy DP27 generally requires that a basement impact assessment be included with any application involving excavation. The assessment of the previous application concluded that the small amount of excavation required to accommodate the proposed lifts was likely to have a negligible impact on the existing building and groundwater conditions and thus a BIA was not required.

However, basement applications have become increasingly contentious over the last few months. The current Development Control Committee have been intensely scrutinising all such proposals. As such it may be that the lack of a basement impact assessment is raised as a concern by committee members. As such it is recommended that as a minimum a statement from an appropriately qualified engineer be provided which provides a preliminary opinion on the likely impact of the proposed excavation on the stability of the existing building and the groundwater environment.

CIL

Please note that proposal may be liable to the Mayor's Community Infrastructure Levy (CIL). The contribution for developments within Camden is set at £50 per square metre.

Please also be advised that the Camden CIL will come into effect in April 2015. Further advice can be found on our [website](#).

Documents

In addition to the other standard requirements, the following documentation should be submitted with the application:

- Detailed drawings of wheelchair rooms.
- Design and Access Statement
- Air Quality Assessment
- Noise Impact Assessment
- Planning Statement
- Sustainability & Energy Statement (inc. BRUKL reports)
- BREEAM Pre-assessment
- Transport Statement
- Basement Impact Assessment
- Draft Construction Management (inc. Construction Logistics Plan)
- Draft Hotel Management Plan
- Draft Delivery and Servicing plan
- Draft Workplace and Guest Travel Plan

Please note that the application should be submitted electronically (i.e. no paper copies), preferably through the [Planning Portal](#).

Conclusion

It is considered that the increase in the number of rooms, and the associated knock on impacts on the reduced standard of accommodation resulting from smaller rooms and impact on the amenity of adjoining occupiers and the traffic network due to additional movements to and from the site, are likely to render the proposal unacceptable. However, subject to an appropriate reduction in the number of rooms and an increase in their size, and satisfactorily overcoming the other concerns raised above, the proposal is likely to be considered acceptable.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Control section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 2053.

Yours sincerely,

Alex McDougall
Planning Officer – West Area Team