

SANDY BROWN

Consultants in Acoustics, Noise & Vibration

**The Chairman
Bloomsbury Association
c/o 8 Gower Street
London
WC1E 6DP**

15306-L01-C

19 August 2015

112A Great Russell Street, planning application 2015/3605/P *Acoustics review*

Dear Sir

At your request, I have undertaken a review of the acoustics and noise issues related to the application to build an underground hotel in the existing car park at the above address. The review has been of all the documents available for download from the council's web portal, the key items of which have included the following:

1. Architectural plans and sections 2897/P/01 to 08 and 11 to 19 from Proun
2. Services plans ending in GA-M-570-7000, 7004 and 7005 from Hoare Lea.
3. Planning Statement from GVA dated June 2015
4. Design and Access Statement from Proun dated May 2015
5. Overview of Proposed Mechanical and Electrical Systems document from Hoare Lea dated 08 May 2015
6. Noise Impact Assessment from Hawkins Environmental dated 2 June 2015
7. Draft Hotel Management Plan from Criterion Hotels dated April 2015
8. Construction Management Plan from Sisk, undated

The proposal is understood to comprise the construction of 166 small windowless hotel rooms in the lowest levels of the carpark. This requires new heat rejection plant and power provision, the relocation of some existing plant, and a large amount of air to be moved in and out of the space by a mechanical ventilation system. There are also concerns with potential noise from increased pedestrian traffic and noise from congregating, servicing, and construction.

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The previous scheme is understood to have been refused in 2014, with the acoustics reasons understood to include that plant and activity noise egress had not been adequately addressed, which I have reviewed herein for this latest application.

Note that bulleted items in this letter are our recommended actions.

Review of the mechanical and electrical systems

The application has provided an overview of the mechanical and electrical systems as well as very preliminary strategy drawings. This provides the following in relation to what could affect the neighbours:

1. A plant room at ground level off Adeline Place to contain heat rejection plant and a standby generator among other potential plant.
2. Ventilation duct path from louvres at the façade of Adeline Place down the car park ramps to ventilation plant located in the basements, as well as air scrubbers.
3. A new power substation located off Adeline Place.
4. Relocation of some existing basement plant.
5. Other plant at locations not currently known.

Ground level plant room on Adeline Place

The 'external' units of the air source heat pumps (ASHP) are understood will be located in the plant room at Ground Level that is louvred to Adeline Place.

Due to the number, size and expected noise level of these units (and any other plant located here), it is expected that suitable acoustic enclosures would be needed for the ASHP units (and other plant) and/or acoustic louvres at the façade.

- A full assessment of the noise from this and all other externally affecting plant must be made a condition of any planning approval.
- Such an assessment should understand that such plant inherently contains attention catching characteristics (discrete notes and/or distinct impulses) and must therefore be designed to have a noise level at 1 m from the nearest neighbouring façade of 10 dB below the existing lowest background noise level (L_{A90}), as per Camden's UDP, rather than 5 dB below.
- A measurement test of the resulting noise levels should also be required before the plant is allowed to operate.

Ducted ventilation openings on Adeline Place

Ventilation ducts are planned to draw in and discharge air through vertical louvres to be located on the Adeline Place façade. The exact location and size of these is not given, yet the

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look of these and the noise levels emanating from them would be issues for the amenity of the neighbours and should thus be reviewed for their acceptability.

Note that louvres to ducted air paths should not be restricted in size simply for the sake of reducing visual impact. It is important that the airflow required can pass through the louvre without causing excessive regenerated noise. Therefore, an improved louvre product might be a way to balance the size needed. Currently the ducts are shown as 600 mm x 600 mm each handling an air volume of 2.5 m³/s, which equates to a velocity of ~6.9 m/s. This should be slowed down closer to the façade openings to ensure regenerated noise is controlled.

- Ensure that regenerated noise from airflow through external louvres is included in any noise egress assessment.

This ventilation air is stated to require air scrubbers. The location of these and their noise impact has not been stated in the application.

- If the air scrubbers are to be located in an area open to the outside of the building, they must be included in the noise egress assessments.

The ventilation plant connected to these ducts and louvres is shown to be located an advantageously long distance away down the car park ramps to the west end of each of the two hotel basement levels. This leaves plenty of room for the attenuation required to achieve Camden's cumulative noise egress limits at the neighbours, though none is currently shown in the preliminary services drawings.

- A plan and assessment for the attenuation measures required to achieve the noise egress limits should be submitted for review.

Currently the ductwork is shown to be routed through the new substation and terminating in the new cycle store, instead of to new louvres facing on to Adeline Place.

- An elevation should be required showing where these louvres will be, how large they are, and how they will look.

Standby generator

A standby generator is understood will be located in the plant room louvred to Adeline Place. This promises to be a very noisy item of plant that will need to be periodically tested as well as provide emergency power to the fire-fighting lift and shaft.

- Ensure such plant will be used for emergencies and testing only, not for standby generation of power for non-emergency uses.
- Ensure plant is only tested for limited periods and at times least disruptive to the neighbours.
- Ensure plant is adequately attenuated so as not to exceed the noise egress limits for emergency plant. Such limits must be clearly stated in the planning conditions.

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New substation

There is a new electrical substation proposed at Ground Level off Adeline Place. These can add significant new plant noise sources, typically tonal in nature due to the transformers usually present. The plant provided for new substations is many times not under the control of the project, but rather the providing utility.

- Special care must be taken to ensure that substation noise is included in the noise egress assessments and attenuation packages, and that these are properly reviewed.

Foul drainage

Due to issues with making new penetrations in the basement slab, foul drainage is said will be handled using vacuum drainage systems. A location is said to have been allocated for this, but it is not yet shown on the drawings.

- If the vacuum drainage systems are to be located in an area open to the outside, it must be included in the noise egress assessments.

Relocated basement internal plant

The mechanical services design overview says the relocated positions are shown on the drawings, but the new locations are not readily apparent.

These relocated plant items:

- should be kept reasonably near to where they are currently located, rather than moved further up the ramps toward the external louvres, to better ensure their noise does not disturb the external neighbours; and
- should be included in any assessment of noise egress to the neighbours to be presented to the council, including information on their existing noise, the potential effect of their new locations on noise egress to neighbours, and details of the attenuation measures to be employed.

Relocated ground level external plant

There are existing plant items in the areas set aside for the new substation and plant room which will require relocation, though this is not identified in the application documents. Some of these plant items are understood to have been identified by the council as a nuisance, though not yet brought into compliance.

- The relocation of ground level external plant items must include the provision and/or retention of any attenuation measures required to keep their noise within the established limits.

Review of the Noise Impact Statement

The Noise Impact Assessment provided with the application gives information about the environmental noise surveys undertaken at the site, reviews the current government and industry guidance as well as Camden's requirements, provides an assessment of noise egress from plant, and discusses the noise impact of the hotel, the YMCA and Crossrail.

Section 3: Noise measurement study

There are a number of concerns with the noise survey that has been used as the basis of the assessments undertaken:

- It was undertaken in March of 2012. It is our understanding that noise surveys generally need to be within the previous two years of an application in order to be considered suitable for use in setting environmental noise limits. The survey should be redone to better characterise the current noise environment.
- It was undertaken for a single 24-hour period that did not capture a weekend night or particularly the Sunday night to Monday morning period where background noise levels are typically their lowest, yet when the hotel plant will still be in operation. The length of the survey should be extended to include a full weekday and the weekend.
- It was taken at a location near existing operating plant that has been the subject of enforcement notices not yet cleared to the satisfaction of the local authority and the neighbours. All of these should be in compliance before the environmental noise survey is undertaken.
- It was taken at a location near existing operating plant, and thus not adequately representative of the noise levels experienced 1 m from the nearest neighbouring facades. The location should be adjusted to be representative of the receivers.

As such, we do not feel the levels used as a basis for setting noise limits for plant noise egress (Table 3.2) are suitable. A new noise survey should be undertaken that incorporates the above concerns.

There are also issues with the assessment of the survey results. The consultant appears to be using an analysis method similar to that found in BS 4142:2014, which as a new standard does not yet apply to Camden's requirements.

- The L_{A90} used to set limits should be the lowest background noise level measured for the period, not the 'majority' noise level.

Based on their current survey data the L_{A90} noise level to be used as the basis for setting plant noise egress limits should instead be L_{A90} 56 dB during the day (instead of the 57 dB the report states), L_{A90} 54 dB in the evening (estimated as there was no Figure for evening noise levels) instead of the 56 dB the report states, and L_{A90} 51 dB at night (as the report states).

- These numbers must be changed once the updated noise survey is completed.

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Section 4: Plant noise impact assessment

The plant noise assessment presented in Section 4 is understandably vague at this early development of the design for the hotel's mechanical services systems, but it seeks to instead establish a noise limit for noise at 1 m outside the plant room's louvre. There are a number of issues with the assessment:

1. The limit set is 5 dB below the background noise level, assuming the plant will not have discrete continuous notes or distinct impulses. This was reportedly agreed with Camden. However, Air Source Heat Pumps have fans and compressors that produce discrete notes, and that cycle on/off causing distinct impulses. It is appropriate under Camden's policy to instead set the limit at 10 dB below the background noise level.
2. The assessment only considers the noise from the plant room. It does not take into account the noise from the new substation (also having discrete notes) and the louvred openings for the basement ventilation plant.
3. The assessment only mentions the ASHP units located in the ground level plant room off Adeline Place, though it is known that there will be a standby generator in this room, as well as the potential for other plant, all of which would cumulatively need to comply with the limit set at the louvre.

With questions about the age, length and conditions of the original noise survey, the determination of the L_{A90} level, the adequate provision for discrete notes and distinct impulses in the set limits, and the non-inclusion of other sources, the noise level allowable inside the plant room is likely to be much lower.

- The assessments of plant noise egress should be redone in light of the above issues to show that the proposal can be delivered in compliance with Camden's noise policy.

Section 5: Hotel noise impact assessment

This assessment states it is unlikely pedestrian noise will be a nuisance considering the existing high noise levels from Tottenham Court Road, the lack of a licensed premise as part of the application, and comparison with the similar entrance to the St Giles Hotel on Bedford Avenue.

It continues to discuss various ways a hotel management plan could alleviate lingering concerns including signage, or the reliance on hotel staff to intervene when there are groups congregating around the entrance. Such a plan is not provided with the application.

There are some lingering concerns with this:

- The assessment should address that there is understood to already be a pedestrian noise issue in the area (eg, drinkers and smokers loitering at the entrance stairs to Bedford Court), and how the addition of up to 330 new people coming from the hotel will cumulatively add to the issue as they look for restaurants, convenience shops, off-licences or other services in the area.

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- The assessment should address that there is understood to already be a noise issue with trucks, coaches and taxis parked all day with engines running that will be added to by the proposal.
- The assessment should address employees smoking at the employee entrance on Adeline Place.

Hotel Management Plan

The preliminary hotel management plan (HMP) summarises how the hotel is envisioned to be managed and covers noise related topics such as arrivals/exiting, security and servicing.

- The HMP should detail how it will be enforced, how such enforcement will be maintained over the life of the hotel (including any successor owners), how it will inherently keep the neighbours from the burden of policing its enforcement, what measures will be taken if there are violations and within what timeframe, and how it can be improved as needed over time.
- The HMP should provide details and specifics as to how the issues raised in the previous section will be addressed.

A Street Management Policy is said will be provided with the final HMP to manage anyone within the vicinity of the Hotel including passers-by needing assistance. Ground level staff (including a 24-hour concierge) are to ensure guest disperse promptly when leaving. Policy details are said will be determined in conjunction with the neighbours.

- The HMP should provide evidence of how guests arrive to similar nearby hotels to ensure the limited number of those arriving by taxi, coach or other motor vehicle will be realised. How might this change with time? How can it be controlled?
- The HMP should detail how noise from rolling suitcases of those arriving by public transport will be controlled.

A security patrol is said will be provided for the internal common areas, but this is not extended to include patrols of the external entrances for staff and guests.

- The HMP should detail how security will be maintained around the external portions of the site.

A Servicing Management Strategy is mentioned for the handling of rubbish and deliveries to the Adeline Place facade. There will be a small electric vehicle that ferries goods from the street level dropoff point down the existing upper car park ramp to the hotel. Deliveries are said will only be within normal work hours and spread out evenly through the day.

- The HMP should detail how internal and external plant will be maintained to ensure noise levels do not increase over time.

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- The noise from the electric vehicle should be included in the assessments for noise, as it cannot be assumed such a vehicle will have a quiet and non-tonal noise.
- The HMP should detail how goods will be transferred from delivery trucks to the vehicle. No elevation of the Adeline Place façade has been provided to inform how this will be configured.
- The HMP should provide details and specifics of how the refuse bin store will be operated and used.

Construction Management Plan

The construction management plan (CMP) included in the application summarises how the project is proposed to be delivered. It envisions a 40-50 week construction period that uses the existing car park ramps to provide access for construction materials and refuse from a hoarded area on Adeline Place. Construction would work from Level -5 up and out with the final works happening at the Adeline Place façade.

Site offices would be located within the building at Level -4 accessed from a worker entrance also on Adeline Place.

- Noise from entry turnstiles (eg, security beeps, metal bangs) should be kept to a minimum as these noises will be more constant throughout the construction process.
- The location of smoking areas, said to be away from either entrance area, should be agreed now and monitored to ensure no nuisance to the neighbours.

During unloading and loading of construction materials, it is envisioned there will be lane closures on Adeline Place and pedestrians will be diverted to the opposite side of the street.

- Truck movements should be kept to a minimum, distributed evenly over the course of the work day (only in approved noisy periods) and be routed such that they shall never need to reverse to avoid reversing alarms.
- A gas powered forklift will cause excess engine noise and fumes outside neighbouring residences windows. There are quieter items of machinery that could be employed for unloading purposes in line with best practical means.

Most works will take place within the building, but some external works are needed to configure the Adeline Place and Great Russell Street entrances.

- External noisy works and deliveries should be limited to typical two-hour periods with two-hour gaps between.
- Site hours currently do not preclude working on Bank Holidays, but should.

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Newsletters and other announcement means will be used to inform neighbours of upcoming works and potential disruptions, an example of which is included as an appendix to the CMP.

- Neighbours should not be burdened with having to police the agreed construction management plan. Clear contact details for issues must be given and responded to within an agreed maximum time frame.

Review of architectural drawings

- Doors to the new cycle store, substation, plant room and refuse bin store must have noise from their operation controlled by adequate soft closers that are maintained.
- The proposals should show a before and after façade drawing of Adeline Place, to help determine if its look will be acceptable.

Conclusions

There are still some major noise issues to be addressed with this updated submission. A summary of the bulleted actions recommended herein is as follows:

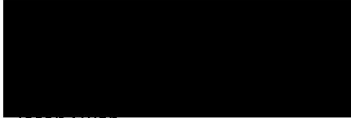
1. The environmental noise survey is not representative of the noise climate in the area and must be redone as detailed herein. Any nuisance issues with existing plant must be cleared before this new survey is undertaken.
2. When setting the limits for plant noise egress based on the data from the updated survey, the lowest L_{A50} values should be used, and limits for new plant should be set at least 10 dB below this lowest background noise level.
3. Suitable plant noise assessments must be provided for approval, which must include all externally affecting plant including but not limited to the substation, generator, ventilation plant, ASHPs, electric service vehicle and existing plant to be moved.
4. Any attenuation measures shown to be needed in these assessments must be provided, and a post-construction measurement test should be required to ensure it meets the requirements.
5. The assessment of the hotel's noise impact must take into account the concerns with existing pedestrian and traffic noise as well as the operational concerns with how the hotel will manage the issue when hotel staff are several storeys below.
6. A revised and detailed hotel management plan should cover the concerns of the neighbours as detailed herein in terms of noise and other issues.
7. A revised construction management plan should cover the concerns of the neighbours as detailed herein.
8. The architectural drawings should include soft closures for external services doors and an elevation drawing of the proposed louvres on Adeline Place.

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This completes our comments at this time. Please do contact us if you require additional information.

Yours sincerely



Jason Swan
Partner

For and on behalf of
Sandy Brown Associates LLP



112A GREAT RUSSELL STREET, LONDON WC1B 3NP

CHANGE OF USE OF PART GROUND FLOOR AND BASEMENT LEVELS -4 AND -5 FROM CAR PARK (SUI GENERIS) TO 166 BEDROOM HOTEL (CLASS C1), INCLUDING ALTERATIONS TO GROUND FLOOR ELEVATIONS ON GREAT RUSSELL STREET AND ADELINE PLACE.

Application for planning permission: 2015/3605/P

22 August 2015

The Bloomsbury Association objects to this application and a summary of our concerns was contained in our representation dated 2 August 2015. We indicated that we would be elaborating on these in subsequent submissions, of which this is the first. Further submissions will follow.

We recognise that the applicant has not varied the design proposal substantially but is seeking to address the reasons for refusal given in the previous application, 2013/5075/P, in order to address a deficiency in the lack of sufficient technical justification for the proposal. The application seems to be based on demonstrating that all the past reasons for refusal can be met and all the objections made can be overcome. It is a classic strategy charted by planning lawyers but one that makes it difficult to challenge without comparable specialist advice.

We are, as our summary statement indicated, particularly concerned that the proposal represents an over development of the site for a single use - hotel - to the extent that its cumulative impacts on and off-site cannot be shown to be manageable. It is difficult to quantify over development from first principles and the approach we have taken is to undertake a high level technical review of the supplementary information accompanying the application and assess whether it is sufficiently robust to demonstrate that the proposal is achievable without unmanageable, harmful environmental impact.

Noise Impact Assessment

This is a challenging development proposal, not only because of the immediate need to address the issues that it presents to local residents but also because, so far as we are aware, it has never been done before, either in London or the UK. There are 'pod' hotels elsewhere but it would be a challenge to find one built entirely underground anywhere in the world. There are defense establishments that involve habitation at depths but they are purpose built and places of last resort, not accommodation of choice and not created out of the inner depths of another building in another use.

The underground ventilation system is, of course, the essential life support system of this proposal. All air-conditioning and ventilation plant will be at pavement level on Adeline Place, directly opposite residential buildings, including massive provision for 'fresh' air intake and extraction using the volume of existing car park access ramps. It will operate 24-hours a day, 7 days a week and the car park ramps will be used as the biggest air inlet and exhaust ducts in London not connected with the underground railway system. It will be noisy.

The Noise Impact Assessment is based entirely on a noise survey undertaken by Hawkins Environmental. It was carried out a considerable time ago, in March 2012. We considered it unreliable at the time of the last application and more so now, as the local noise climate has changed substantially since. It was also measured at second floor level, immediately outside the plant room of the St Giles Hotel, which seems hardly representative of background noise levels.

Noise emissions from existing plant on Adeline Place have been regularly monitored by the Council's Environmental Health Team. The most recent was on 11 August 2015 when a site visit by

Environmental Health Officers concluded that noise emissions were potentially at a level to constitute a statutory nuisance. We therefore feel that the survey should be undertaken with existing plant turned off rather than it being considered representative of normal conditions.

We have suggested that the survey should be repeated from a location at first floor level of the residential building opposite and have indicated that we can facilitate this if the applicant is agreeable. Otherwise we will remain skeptical about any conclusions reached by the applicant's consultants on the noise impact of proposals that are based on unreliable survey results.

A review of the applicant's Noise Impact Assessment has been undertaken by Sandy Brown Associates and is included with this statement. It concludes that there are some major noise issues to be addressed in the proposal as follows:

1. The environmental noise survey is not representative of the noise climate in the area.
2. Any nuisance issues with existing plant must be cleared before a new survey is undertaken.
3. The levels used as a basis for setting noise limits for plant noise egress are unsuitable. When setting the limits for plant noise egress based on the data from the updated survey, the lowest L_{A90} values should be used, and limits for new plant should be set at least 10 dB below this lowest background noise level.
4. Suitable plant noise assessments must be provided for approval, which must include all externally affecting plant including but not limited to the substation, generator, ventilation plant, ASHPs, electric service vehicle and existing plant to be moved.
5. Attenuation measures shown to be needed in these assessments must be provided, and a post-construction measurement test should be required to ensure it meets the requirements.
6. The assessment of the hotel's noise impact must take into account the concerns with existing pedestrian and traffic noise as well as the operational concerns with how the hotel will manage these issues when hotel staff are several storeys below.
7. A revised and detailed hotel management plan should cover the concerns of neighbours in terms of noise and other issues.
8. A revised construction management plan should address the concerns of neighbours.
9. The architectural drawings should include soft closures for external services doors and an elevation drawing of the proposed louvers on Adeline Place.

Most concerning is that the exact number or type of equipment has not been specified; therefore it is not possible to conduct a detailed assessment of noise emissions. This is fundamental as the type of air handling equipment likely to be used is relatively large and very noisy, which is why they are normally installed on the roofs of high buildings, and not at street level.

There is, at best, some uncertainty here. So, too, is the prospect of future deterioration of the noise climate through lack of equipment maintenance and general degradation of plant over time. It would be unreasonable to expect residents to be able to measure any increase in noise level differences over a period, and equally unreasonable to place the burden on the Council for periodic surveys and monitoring to ensure compliance with any conditions.

The NPPF, in paragraph 123, states that planning policies and decisions should aim to:

- avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
- mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

As currently proposed, we feel that the development could be over-heavily reliant on conditions to regulate and control its severe environmental impact on residential uses on Adeline Place, the effect of which will extend to 24/7 - an impact that has not been satisfactorily resolved in technical information submitted with the application. Planning control mechanisms are a poor substitute for certainty and this would place an impossible burden on both local residents to monitor and report incidents of malfunction and on the Council to enforce such conditions. Situations have arisen recently at this same location where the Council has been unable to take planning enforcement action against noise emissions from plant installed at street level on Adeline Place without planning permission so we are skeptical about whether the use of planning conditions to regulate noise emissions from this proposal could be considered either reasonable or enforceable. It would also be wholly inappropriate to use a S106 agreement for this purpose.

When imposing planning conditions paragraph 206 of the NPPF outlines six tests planning conditions must adhere to: they 'should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects'. Paragraph 21a-004 of the PPG goes on to advise that a condition will not be considered 'reasonable in all other respects' if the condition seeks to make development that is unacceptable in planning terms acceptable. We feel that such matters should be resolved through the planning application process and not through the use of planning conditions.

Policy DP28 of the Council's LDF confirms that the Council will not grant planning permission for development likely to generate noise pollution or development sensitive to noise in locations with noise pollution, unless appropriate attenuation is provided. Adequate attenuation is not proposed in the planning application to show that the proposal can be delivered in compliance with Camden's noise policy.

For the reasons outlined above, we consider the Noise Impact Assessment submitted with the planning application to be potentially misleading in terms of outlining the existing noise conditions experienced by local residents. The noise survey on which it is based is fundamentally flawed and, as such, we do not consider that the Assessment adequately addresses the requirements of paragraph 123 of the NPPF or Policy DP28 of the Council's LDF. We conclude that the Noise Impact Assessment is not sufficiently robust to demonstrate that the proposal is achievable without unmanageable, harmful environmental impact.

The grant of planning permission on this basis would be unsafe and inconsistent with the Council's and national planning policies. We therefore urge the Council to refuse the application.

Jim Murray
Chairman
Bloomsbury Association

Copies to:
Keir Starmer, MP
Andrew Dismore, GLA
Councillor Adam Harrison, London Borough of Camden
Councillor Sabrina Francis, London Borough of Camden
Councillor Rishi Madhani, London Borough of Camden
Councillor Sue Vincent, London Borough of Camden
Raymond Yeung, London Borough of Camden
Bloomsbury Conservation Area Advisory Committee
Local residents and businesses