

Briefing note- additional information in relation to RN: 2015/3605/P

Introduction

This note provides further information in relation to representations made during the consultation period of this application. Each heading is considered in turn with comments we are responding to summarised with a response from the consultant team.

Energy and sustainability:

In reference to the three issues raised in Amy Farthing's email dated 04.08.2015:

- **Item 1: 'Please provide full NCM calculation outputs (BRUKL reports) to back up the claims made in the energy statement'.**

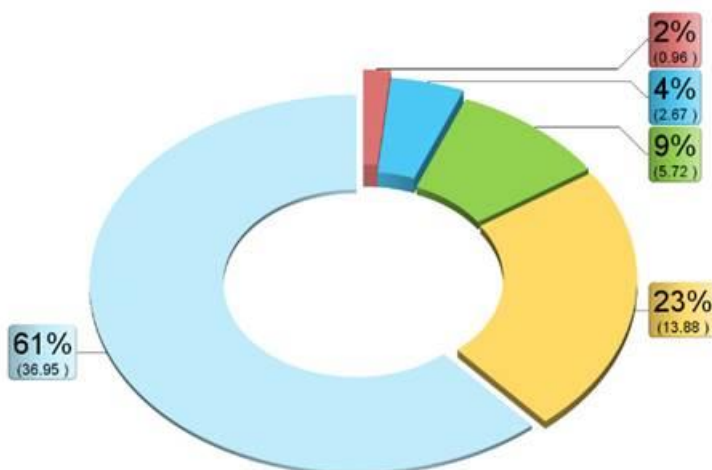
Response: The BRUKL is attached to this covering email which shows the 25% CO₂ reduction.

- **Item 2: 'As requested during pre-app correspondence, regulated and unregulated energy demands in kWh/yr (broken down into use type – heating, hot water etc) and associated CO2 emissions should be stated 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'.**

Response: Below are the calculations broken down into individual elements as requested from the Part L2A modelling assessment of the Energy Statement and BREEAM Pre Assessment:

Annual energy (Be Lean + ASHP):

Heating	=	0.96kWh/m ²
Domestic Hot Water	=	36.95kWh/m ²
Cooling	=	2.67kWh/m ²
Aux	=	5.72kWh/m ²
Lighting	=	13.88kWh/m ²



■ Heat ■ Cool ■ Aux ■ Lights ■ DHW

DHW	=	61% of annual energy
Lighting	=	23%
Auxiliary (fans / pumps)	=	9%
Cooling	=	4%
Heating	=	2%

Estimated annual **ASHP Load:**

Heating	=	20MWh
Hot Water	=	700MWh
Cooling	=	40MWh

Using the season efficiencies stated in the energy report provides the following **energy consumption by the ASHP:**

Heating	=	5MWh
Hot Water	=	175MWh
Cooling	=	9MWh

Approximate annual Carbon Emissions at each stage of the energy hierarchy:

Gas fired system (Be Lean)	=	220,000kgCO ₂ .year ⁻¹ (regulated)	251,000kgCO ₂ .year ⁻¹ (+un-regulated)
ASHP (Be Lean)	=	144,000kgCO ₂ .year ⁻¹ (regulated)	177,000kgCO ₂ .year ⁻¹ (+ un-regulated)
Gas fired CHP (Be Lean)	=	158,000kgCO ₂ .year ⁻¹ (regulated)	190,000kgCO ₂ .year ⁻¹ (+ un-regulated)
District Heating 01	=	198,000kgCO ₂ .year ⁻¹ (regulated)	232,000kgCO ₂ .year ⁻¹ (+ un-regulated)
District Heating 02	=	215,500kgCO ₂ .year ⁻¹ (regulated)	249,500kgCO ₂ .year ⁻¹ (+ un-regulated)

- **Item 3: 'Full details showing how the scheme has been 'future proofed' to enable connection to a future network should be provided including:**
 - **provision of a single plant room producing all hot water, including engineering measures to facilitate the connection of an interfacing heat exchanger;**
 - **space identified for the heat exchanger;**
 - **provisions made in the building fabric such as soft-points in the building walls to allow pipes to be routed through from the outside to a later date; and**
 - **any external pipework routes identified and safeguarded'.**

Response: The attachment 2897-P-15-Rev-G is a revised Basement -4 floor plan illustrating a new plant room area to accommodate necessary plant and equipment, to interface with the future provision a district heating system. Further detail is shown on the attachment M-570-7000 Rev P8 regarding connection to a future infrastructure pipework system located in Adeline Place.

Should the district heating system become reality, the necessary district heating system primary pipework connections, plant and equipment and majority of the secondary heating pipework system can be installed before a temporary shutdown of existing services will be necessary, whilst systems are transferred to the new heat generation system.

The attachment LET-2310314-20150915-JG-Response to Bloomsbury-Sustainability-REV A provides further clarification regarding Energy and Sustainability concerns raised in The Bloomsbury Association and Waterman Group's objection letter.

Other comments relating to Energy and Sustainability:

- **Comment: 'BREEAM Credit awarded for enhancing site ecology'**

Response: Please refer to updated BREEAM pre-assessment excluding any credits for enhancing site ecology. The reports shows that the development will still achieve a 'very good' rating

Air quality

In reference to the two issues raised in Amy Farthing's email dated 05.08.2015:

- **Item 1: 'The applicant is encouraged to include planting on Adeline Street at the ventilation inlet to further improve air quality as per Mayors SPG. This would also have the benefit of provide urban cooling and some surface water run off reduction, as well as enhancing amenity'.**

Response: This item was raised by the Environmental Health Officer during consultation and the item examined but due to limited space and access requirements this is not possible.

- **Item 2: 'Please confirm whether any demolition or earthworks are proposed as a part of the development, and if so provide an updated risk assessment assessing these phases in accordance with the Mayors SPG on the control of dust and emissions during construction and demolition'.**

Response: Given that the space is underground and already exists the construction air quality assessment has screened out the need for assessment of demolition or earthworks as these activities are not occurring. It is accepted that mitigation measures should be secured within the CMP as per the standard CMP pro-forma.

The attachment 'LET-2310314-20150915-ICC-Response to Bloomsbury-Air Quality-REV A' provides further clarification regarding Air Quality concerns raised in The Bloomsbury Association and Waterman Group's objection letter.

Transport for London

In reference to the two questions raised in Tom Jolley's email dated 12th August 2015:

- **Item 1: 'Is the 5th floor basement existing?'**

Response: Yes, the 5th floor basement level is existing.

- **Item 2: 'Are there any planning excavation or structural works on these floors?'**

Response: The only excavation proposed is minor and relates to creating two lift pits. Please refer to the attached Basement Impact Assessment for further clarification.

In reference to Tom Jolley's letter dated 03.09.2015:

Cycle and car parking: It is noted that a financial contribution of £200,000 towards an on-site Cycle Hire Docking Station is to be secured by S106. This is subject to further discussions with TfL and Camden regarding the S106.

London Underground Tunnels and Infrastructure: The applicant's Consultant, Pinnacle can confirm that a new service lift is proposed along Adeline Place which would be the closest point to the LU tunnel, however at this early stage of design no specification for the lift has been given. It is understood that further details can be secured by pre- commencement condition or S106.

Crossrail: It is noted that a financial contribution of £397,380 towards the funding of Crossrail is to be secured by S106. This is subject to further discussions with TfL and Camden regarding the S106.

Thames Water

- **Item 1: In reference to Thames Water's email dated 29.07.2015 a Drainage Strategy has been requested.**

Response: Please refer to attached Drainage Strategy prepared by Pinnacle Engineering. In summary, the discharge of the foul from the proposal will be subject to a Section 106 (Water Industry Act 1991) legal agreement with Thames Water

Camden Economic Development

- **Item 1: Response to Tom Baines (LBC Economic Development Officer) representation relating to Local Procurement Code and Apprenticeships.**

Response: The points noted in Tom Baines' email dated 11th September are to be secured by S106. This is subject to ongoing discussions with Camden regarding the S106, and draft heads of terms have been submitted.

Other points to note

Elevations

- **Item 1: Case Officer advised submitting proposed elevations and CGI's.**

Response: Please see attached revised, existing and proposed elevation drawing (2897-P-20-Rev-A) of all altered areas. Furthermore for information purposes, we will be issuing two CGI views of the main entrance on Great Russell Street and the Adeline Place elevation to help put the proposed changes in context. Please note that there are no proposed changes to the Bedford Avenue elevation and hence no elevation drawing has been submitted.

Cycle parking

- **Item 1: 'Case Officer requested further information relating to cycle parking'.**

Response: Please refer to attached revised Ground Floor Plan (2897-P-11-Rev-F) showing an additional 8 staff cycle spaces located within the internal ramp area. The plans have also been revised to retain 4 existing cycle spaces along Adeline Place in addition to the 20 proposed guest spaces all on private land.

Ground Floor concierge

- **Item 1: 'Case Officer request for Ground Floor Plan showing location of Concierge Desk'.**

Response: Please refer to attached revised Ground Floor Plan (2897-P-11-Rev-F) showing the concierge desk located in the main entrance on Great Russell Street. The Ground Floor concierge has also been included in the revised draft Hotel Management Plan (dHMP). The attached -5 Floor Plan (2897-P-16-Rev-G) has also been updated to replace the label 'reception' with 'common area' to remove any confusion as the reception area will only be located on -4.

Staff numbers and shifts

- **Item 1: 'Case Officer request for further information in respect of staff numbers and shifts'.**

Response: Please refer to attached revised dHMP indicating an approximate 24 staff members will be required to operate the hotel. This figure has been determined from other hotels in the area. Specific staff shifts and locations are operator sensitive and would therefore be included in the final HMP to be protected by condition and approved prior to commencing.

Late-night security:

- **Item 1: 'Case Officer request for further information regarding security arrangements'.**

Response: Please refer to the attached dHMP indicating that a security guard will be located at the main entrance to the Hotel between the hours of 7pm and 7am. It should be noted that the neighbouring VQ restaurant operates 24/7 and as such already contributes a significant amount of pedestrian footfall along Great Russell Street and the adjacent roads. As such it is not believed that the Hotel would create any additional disturbance to the area

and furthermore the provision of a security guard will help reduce any disturbance currently caused by the restaurant's users.

Please refer to the attached dHMP indicating the comprehensive use of CCTV cameras located in key positions throughout the hotel. In addition to monitoring the internal Hotel area, CCTV cameras will monitor all guest and service entrances along Great Russell Street and Adeline Place.

Hotel Management Plan

- **Item 1: 'Case Officer seeking clarification regarding guest mix and review of the Hotel Management Plan'.**

Response: The projected guest mix is operator sensitive and may therefore be more appropriate to include in the final HMP to be protected by condition and approved prior to commencing. It is believed the Hotel's guest mix will not have a significant impact on the management of the Hotel and it is therefore deemed appropriate to remove it from the dHMP.

Please refer to the attached dHMP indicating that the HMP will be reviewed annually for the first 5 years following completion. Please confirm this is acceptable and make the appropriate amendments to the draft s106 agreement.

Servicing

- **Item 1: 'Case Officer request to provide further information regarding location of servicing arrangements'.**

Response: We note your request to relocate servicing arrangements to make use of the existing onsite service area along Bedford Avenue. Unfortunately this area is located within the St Giles Hotel demise, therefore for management and operational reasons the use of this service area is not possible.

Construction Management Plan & the West End Project

- **Item 1: Case Officer request to confirm that the Construction Management Plan will account for the West End Project**

Response: Please refer to the attached draft Construction Management Plan (dCMP) confirming that any final CMP make reference to the West End Project and ensure construction does not affect any works related to the project.

The specifics of this coordination will be subject to the successful contractor and future coordination with Camden and TfL and would therefore be included in the final CMP to be protected by condition and approved prior to commencing.

Community Infrastructure Levy

- **Item 1: Case Officer request for CIL Further Information Form**

Response: Please refer to the submitted CIL Further Information Form.

Other representations made during consultation period that have not been addressed above

Crime Impact Assessment

- **Item 1: *Many representations have noted the absence of a CIA from the application submission.***

Response: A Crime Impact Assessment is not a validation requirement of a change of use application. However, the potential for crime within the area is a concern of residents. Therefore the project team have prepared an addendum to the DAS referencing Secure By Design guidance. A revised DAS is submitted within this package. Camden officers have confirmed that this approach is appropriate.

Acoustics

- **Item 1: *Many representations have referenced deficiencies of the Noise Impact Assessment***

Response: This has been addressed in Hawkins Environmental's previous response to the Bloomsbury Association's concerns over noise.

It should be noted that a number of objection letters refer to outstanding enforcement notices for noisy plant along Adeline Place that would affect the baseline noise levels. However Camden officers have since confirmed that there are no outstanding enforcement notices that would affect the baseline levels.

YMCA Representations

- **Item 1: *Engagement with nearest neighbour, the YMCA***

Response: Please see attached email dated 19.08.2015 from Mark Cooper of Criterion Capital in response directly to YMCA regarding their response submitted to Camden on the 6th of August.

Public Consultation

- **Item 1: *Some neighbours have criticised the public consultation strategy***

Response: Please find attached Q&A information sheet which was circulated to neighbouring residents and property owners on the 2nd September which was prepared to help explain the proposed development and answer any questions that may arise regarding the scheme.