



## 112A Great Russell Street

### TPP response to the Bloomsbury Association representations

#### Introduction

1. This note has been produced by Transport Planning Practice (TPP) in response to objections raised by Peter Evans Partnership (PEP) on behalf of the Bloomsbury Association in their letter dated 21<sup>st</sup> September 2015 regarding hotel development proposals at 112A Great Russell Street, London, WC1B 3NP (Ref: 2015/3605/P)
2. Each issue raised in the letter is covered below with the original text in italics followed by TPP's response as bullet points.

#### Opening remarks

3. *"The Bloomsbury Association's submission on the previous application (2013/5075/P) addressed the key issues, including on transport, so these need restating. They are included as an addendum to this review. Just because officers did not consider transport reasons sufficient to include these in the reasons for refusal does not mean that they are not important factors in a balanced judgement. A decision on the application must be taken in the round."*
  - The fact that LB Camden officers did not consider transport reasons sufficient to include as reasons for refusal is very pertinent as it shows that they have adopted a pragmatic view and recognise that the development will have minimal impact in transport terms.
4. *"As you note, the Transport Statement does not address cumulative impact or when a small change takes the changes too far. Successive small changes which all go the same way can lead to an unacceptable end result."*
  - There is no policy requirement to undertake a cumulative impact assessment. A cumulative impact assessment is only a requirement for larger development proposals where a screening exercise has identified that an Environmental Impact Assessment (not applicable to the proposed development) is required. Cumulative impact assessments are not required in a standard Transport Assessment or Statement.

#### Car Parking

5. *"The Association is right in raising concerns over the incremental loss of parking, especially as this affects the local availability of spaces. Having a series of smallish car parks convenient to local catchment areas can be important for local commerce and social activities. Having a policy of reducing car dependence and use does not mean reducing parking below the point where insufficient provision is made for essential car users."*

6. *The position of Westminster [sic] that use has dropped generally does not form a suitable basis for saying that individual car parks can be lost. Before agreeing to the loss of this car park, there should be a review of car parking provision and use in the area, including what parking is needed where. This is especially the case as parking becomes increasingly limited.*
7. *Although the retail uses have declined, there appears to be a continuing demand from local uses. As the economy picks up, what has happened over recent years does not address future needs.*
8. *The submitted Transport Statement is on the basis that there is sufficient existing spare capacity in other car parks. The JMP report quoted for this view was based on information from the period after the 2008/09 economic crisis and gives no indication of future need. Also, there is no consideration in the Statement of the effect of removing the car park on local on-street parking conditions. This would normally be expected."*
  - The JMP study was supplemented by spot counts undertaken by TPP in both 2011 and again in 2012 at the site which corroborated the JMP study findings and clearly showed that the car park is underutilised.
  - The loss of the car park has never been raised as an issue by LB Camden and therefore there has never been a need to update the JMP Study. Indeed, the officer's delegated report for the previous application stated that: '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'.
  - Furthermore, the officer's report stated that: '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).'

### **Servicing and coaches**

9. *"The servicing (laundry and refuse removal) is planned for Adeline Place rather than Bedford Avenue. Moreover, this is planned to be 'on-street', so vehicles will have to park there, not within the premises. Although hotel servicing is limited, there must be reasonable provision. The Council appears to have believed that off-street provision was required from the condition attached to the original YMCA use.*
10. *In terms of service movements, the provision should not be dependent on the particular characteristics of budget hotels unless the planning permission specifies that this is all that can be provided. Without this, a change to another type of hotel could be made without the need for further consideration. Normal practice would be to take a typical characteristic for the permitted land use, not the specific characteristics of the first occupier.*
11. *A site assessment would be needed to comment on whether servicing from Adeline Place would cause difficulties. Presumably the double yellow lines are there for a reason. There is no assessment of the effect of service vehicle parking on environmental intrusion, especially at times when local roads are otherwise quiet. The Transport Statement set out reasons why other options are not practical. For Adeline Place, however, the argument for acceptability is limited to comment on the Traffic Regulation Order and the*

*previous report by officers. There is no consideration of the issue on merit or of the cumulative effect.*

- The Council have adopted a pragmatic approach in respect of servicing and recognise that any potential impact will be minimal, especially bearing in mind the nature of the hotel with no catering or conferencing facilities. This is reflected in the officer report for the previous application which noted "A recent appeal decision for a hotel in the area ... 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."
  - Conditions attached to the original YMCA use should not be a material consideration and every application should be judged on its merits.
  - TPP fully accept that in some instances it is the use class which should be judged rather specific characteristics of the occupier. However, this development is quite unique and it should be borne in mind that the majority of the floorspace is located below ground in tight confines and the ability to "re-invent" itself into a different hotel format is limited if non-existent. Furthermore, a Hotel Management Plan will be secured via a Section 106 Agreement to be updated on an annual basis. This will include details of the servicing provision that any future hotel operator will have to adhere to.
  - In respect of Adeline Place, the refuse provision will be wholly accommodated within the site and appropriately screened; its impact will therefore be minimal. The hotel will be serviced using the existing car park ramp off Adeline Place. A small electronic vehicle (which will remain on the ramp) will transport goods from the ground floor service entrance before depositing goods in a designated service area at Level -4. In addition, there will be an internal service lift between Level -4 and -5. All servicing and deliveries are pre-booked and would be spread evenly throughout the day at off peak times and between normal work hours to minimise the potential for any noise and disturbance to the nearby residents and hotel guests.
  - Additionally, the proposals will remove the existing car park's entrance and exit from Adeline Place. Accordingly, the vehicle activity in this location will in fact reduce as a result of the redevelopment.
  - In respect of the double yellow lines, as a matter of law they allow for a vehicle to stop in order to load/unload for an unlimited amount of time from the end of controlled hours (6.30pm) through to 11am the next day provided loading and unloading continues. Outside of these times, heavy goods vehicles (3.5 tonnes and above) can load for up to 40 minutes. The loading/unloading time for cars and light goods vehicles such as small vans is permitted for up to 20 minutes.
12. *The Hotel Management Plan assumes that most guests will arrive through public transport, but that may change and there is no effective control mechanism. I concur with the Association's comment that Section 3.1.10 of the Transport Statement is based on the assumption that through management policy there will be no coach bookings, but this policy may change, so no weight can be given to this assumption. With the business model proposed of low cost budget accommodation, coach bookings are a strong possibility and I would have expected coach parking to be a characteristic of budget hotels. The discounting of this in the Statement without justification or consideration of*

*the implications of there being some is unsatisfactory. Some coach parking may be acceptable but the issue should be addressed."*

13. Bearing in mind the site location in the heart of central London, in close proximity to Tottenham Court Road station and with no car parking facility, it is apparent that most guests would arrive via public transport. It has already been determined that the hotel booking policy would restrict group bookings and this could be enforced by way of a planning condition.

#### **Planning Conditions and Obligations**

14. *"The previous refusal included a ground on the lack of a legally enforceable Hotel Management Plan. Presumably this is now offered. Nonetheless, this may resolve matters technically but care is need over the practical implications. The hotel management would have no control over how visitors travel. Similarly, other than requiring staff to sign an agreement on not using cars, there would be little control over this or incentive to do so. Universities have tried such agreements with students. I am not aware of any that were successful."*
15. The site location in the heart of central London determines how visitors travel and is self-enforcing. This is influenced by its excellent accessibility to public transport services, the car-free nature of the proposals and the presence of the Controlled Parking Zone in the area. However, this can be further enforced by way of the Hotel Management Plan. As for the analogy with Universities, TPP strongly suspect that none were in a central London location where non-car borne travel is prevalent.

#### **Further comments raised by the Bloomsbury Association**

16. This sections covers additional points raised by the Bloomsbury Association in their report dated 20<sup>th</sup> September 2015.
17. *"Section 2 of the Transport Statement, Existing Conditions, fails to acknowledge that the proposed service access and associated refuse storage for the hotel on Adeline Place is directly opposite Bedford Court Mansions, residential buildings of 132 homes. There is additional residential accommodation at the junction of Adeline Place and Great Russell Street."*
  - As mentioned, the refuse provision will be wholly accommodated within the site and appropriately screened; its impact will therefore be minimal. Additionally, the proposals will remove the existing car park's entrance and exit from Adeline Place. Accordingly, the vehicle activity in this location will in fact reduce as a result of the redevelopment which should be a positive impact for local residents.
18. *"There is no assessment of the effect of service vehicle parking on environmental intrusion, especially at times when local roads are otherwise quiet, indeed it is accepted in the Statement as normal by quoting out of context: "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". Servicing of the St Giles Hotel and its restaurants begins at 04:45 and is a well-documented intrusion against which enforcement action has and continues to be taken by the Council. There is no consideration of cumulative effect on-site."*
  - As mentioned previously, there is no policy requirement for a cumulative assessment to be undertaken for the proposed development. Additionally, St Giles

Hotel and its operation is wholly different to that of the proposed development and it would be inappropriate to use it as a comparator.

19. *"The proposal includes no catering facilities. The development will therefore result in increased traffic to both service the development on-site and to support new or expanded ancillary functions, such as restaurants or cafes, that are developed off-site to meet the new demand. There is no consideration of cumulative effect off-site."*
  - The lack of catering facilities ensures that servicing and refuse collection is kept to an absolute minimum i.e. there will be no need for an early morning delivery to a restaurant as it is claimed to be the case with St Giles, because no restaurant will be provided. Furthermore, the site is located in the heart of central London with a multitude of restaurants, cafes, public houses and bars. Therefore, it is unreasonable to suggest that a 166 bedroom hotel is likely to outstrip the existing restaurant/cafe supply in the area.
20. *"No adequate consideration is given to the effect of the Council's West End Project. Once the new West End Project road system is in place, service traffic will be mainly via Bedford Square/Avenue and Adeline Place, which will cause additional disturbance."*
  - The West End Project has been considered and this is set out in paragraph 3.1.2.4 – 3.1.2.7 of the Transport Statement with relevant plans included in Appendix B. The small number of traffic movements predicted will not have a negative impact on the highway network now or with the West End Project in place. In fact, the proposed development is expected to reduce the number of traffic movements through the removal of the existing car park.
21. *"Cycle parking is not shown on the plans accompanying the application."*
  - Cycle parking spaces are located along the Adeline Place frontage of the scheme and are clearly marked on the proposed ground level plan.
22. *"Lack of capacity on the public footpath at the point of entry would harm pedestrian movement, especially as refuse storage currently exists and a terminating bus stand is also proposed at this location as part of the West End Project."*
  - The proposed development's pedestrian movements represent a negligible addition to the existing situation which will not be noticeable in a Central London location. Having reviewed the West End Project plans, no bus stand appears to be proposed near the site's entrance.

### **Summary**

23. Overall, TPP consider that there are no valid points being raised by the Bloomsbury Association and their Transport Consultant. Furthermore, LB Camden, as highway authority, have not raised similar concerns and therefore, we do not feel it appropriate to give too much weight to the points raised.