



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 ADELIN PLACE.

Application for planning permission: 2015/3605/P

18 October 2015

The applicant has submitted revised documents to the Council that were uploaded to the planning website on 28 September and 1 October 2015. They are all in response to comments made on the original proposal. Amongst them are the following:

- Sustainability response
- Air Quality response
- Building Regulations Part L model analysis
- Revised draft Hotel Management Plan
- Revised draft Construction Management Plan
- Plant layout drawing M-570-7000 Rev P8
- Ground floor plan 287-P-11-Rev F
- Response to objections/comments - Briefing note
- Basement Impact Assessment
- Revised BREEAM Pre-assessment

These have been reviewed by ourselves and by Waterman Infrastructure & Environment and their letter, dated 15 October 2015, is included with this statement. It concludes that the further submitted information does not address the concerns expressed in their letter of the 30 September. It is still not sufficiently robust to demonstrate that the proposed development would provide a suitable M&E solution or would be capable of meeting the Council's sustainability targets.

The reviewed documents demonstrate that the requirements of paragraph 124 of the NPPF and policies DP22 and DP32 of the Council's LDF cannot be met with any certainty. DP32 states, "*Where mechanical ventilation is required due to poor environmental conditions we will expect developments to incorporate high standards of energy efficient design...*" It also states "*Where development could potentially cause significant harm to air quality, we require an air quality assessment. Where the assessment shows that a development would cause significant harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels*".

The grant of planning permission on this basis would be unsafe and inconsistent with the Council's and national planning policies. The Bloomsbury Association's objection to the application as described in its letter dated 13 September 2015 still stands and we therefore urge the Council to refuse the application.

Jim Murray
Chairman
Bloomsbury Association

Enclosure: Review by Waterman Infrastructure & Environment of further submitted documents.

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