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Our Ref: WIE10212- R- 10- PD
Your Ref:

Date: 15 October 2015

BY EMAIL ONLY

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

Dear Sir

**RE: 112A Great Russell Street, planning application 2015/3605/P
Review of further submission documents**

In accordance with your instruction of the 9th August 2015 we undertook a high level review of the air quality assessment, Sustainability and Energy Statement, including BREEAM Pre-Assessment, Summary of MEP Systems, Fire Safety Assessment and Draft Construction Management Plan submitted in support of planning application (Ref: 2015/3605/P) by Criterion Capital to the London Borough of Camden Council on the 24th June 2015. This application seeks planning permission for:

“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”.

Our Letter Report dated 11th September 2015 reviewed the following documents that were uploaded to the Council's web site:

1. Architectural plans and sections 2897/P/01 to 08 and 11 to 19 from Proun Architects;
2. Services plans 141010-HL-XX-B5-GA-M-570-7000, 7004 and 7005 from Hoare Lea;
3. Great Russell Street Hotel Air Quality Assessment from Hoare Lea, 22 May 2015;
4. Energy Strategy and BREEAM Pre-Assessment from Hoare Lea, May 2015;
5. Overview of Proposed Mechanical and Electrical Systems, undated; and
6. Design Note No. DN02 Fire Safety Overview, 16 April 2015.

Further to your instruction of the 30th September 2015 we have now undertaken a review of the additional submissions addressing the above matters submitted in support of planning application (Ref: 2015/3605/P). Our review has been of the following documents available for download from the council's web portal on 28 September and 1 October:

1. Sustainability response;
2. Air Quality response;
3. Building Regulations Part L model analysis;
4. Revised draft Hotel Management Plan;
5. Revised draft Construction Management Plan;
6. Plant layout drawing M-570-7000 Rev P8;
7. Ground floor plan 287-P-11-Rev F;
8. Revised BREEAM Assessment Report_651_376; and
9. Response to objections/comments - Briefing note.

Energy Strategy and BREEAM Pre-Assessment

We are pleased to see that the applicant has taken on board all of our comments regarding the structure of the assessment. Our remaining concern is that the assessment score targeted in the revised document is 56.77%. This only just exceeds the 55% required for the Very Good rating and we would usually recommend targeting 4-5% over the minimum benchmark to provide a contingency as the strategy moves forward to give more confidence that the Very Good rating will be achieved.

As Camden Development Policy DP22 expects “non-domestic developments of 500sqm of floorspace or above to achieve “very good” in BREEAM assessments” it would be prudent for the council to seek further assurance that the “very good” level will be achieved and ensure this is the case through a planning condition. Such a condition should require further evidence to be provided that it can be achieved prior to implementation of the development as well as require a check post implementation of the development that would prevent its operation if the “very good” level is not achieved.

The revised drawing 1441010-HL-XX-GF-GA-M-570-7000 Rev P8 shows the location of the district heating infrastructure in the public highway outside the building. While there is no commitment to connect to this infrastructure it does indicate that it would be feasible in practical terms and presumably costs terms to do so in due course. The drawing revisions schedule indicates that a District Heating Plantroom has been removed from the drawing. It is not clear why this would be done if the applicant is seeking to safeguard the ability to connect to the District Heating system in the future.

As a result it remains unclear how the proposed development will meet the requirements of paragraph 124 of the NPPF to comply with EU Limit Values. In addition it is also not clear how the proposed development will accord with Policy CS13, in particular part (c) of this policy concerning the energy hierarchy. The revised application form for this proposal does not include any information about the plant, ventilation or air conditioning services to the site and the application does not commit to a linkage with the local decentralised energy network despite indicating that it is within the public highway immediately to the east of the site. Given the sensitivity of air quality in the area it would be expected that the applicant would confirm its energy supply and its emissions as part of the planning process. The applicant has not done this.

Proposed Mechanical and Electrical Systems

Drawing 1441010-HL-XX-GF-GA-M-570-7000 Rev P8 indicates that the arrangement of condenser units has been amended. The air quality assessment addendum identifies an exhaust velocity from the ventilation system into the cycle parking spaces outside the building. However, does not address our concerns. No further details have been submitted and so our concerns have not been addressed by the additional information submitted.

Indeed the exhaust air temperature figures supplied appear unlikely to be achieved. The position of the condensing units within the existing building access area are set back from the louvres and so will discharge warm air into this space while also drawing in air from the same location. When ambient air temperature is at or near the figures quoted in the Air Quality Assessment Review document it is unlikely that exhaust air will be at the same temperature. While the condenser units are not specified it is possible, based on the number of units indicated on the drawing and their expected specification that they would emit exhaust air at a rate around 14m³ to 15m³ per second. This would create a positive pressure inside the building preventing cooler air being drawn in leading to the circulation of the same air.

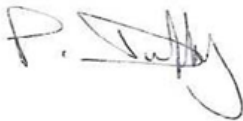
As a result the remarks made in our letter of the 30th September remain pertinent. It has not been shown that the M&E design proposal is viable and there is no reference to refrigerant detection systems which we would expect to be addressed, given the enclosed nature of the proposed development and the potential health risks associated with a leak.

Conclusion

With the exception of the BREEAM assessment where our suggestion have been taken into account the further submitted information does not address the concerns expressed in our letter of the 30th 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.

I trust the above is helpful, but if you have any queries please contact me.

Yours sincerely



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For and On Behalf of Waterman Infrastructure & Environment Ltd