Address:	112A Great Russell Street London WC1B 3NP		
Application Number:	2015/3605/P	Officer: Raymond Yeung	
Ward:	Bloomsbury		
Date Received:	24/06/2015		•

Proposal: 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 openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place.

## **Drawing Numbers:**

2897/L/01B, 2897/P/01B, 2897/P/02B, 2897/P/03B, 2897/P/04B, 2897/P/05B, 2897/P/06B, 2897/P/07, 2897/P/08A, 2897/P/11F, 2897/P/12C, 2897/P/13C, 2897/P/14D, 2897/P/15G, 2897/P/16G, 2897/P/17D, 2897/P/18C, 2897/P/19B, 2897/P/31, 2897/P/32, DMWR/A3/3233/PL-00300revP1, H2047 Noise Impact Assessment v9 by Hawkins, Draft Hotel servicing management Plan v3 by Criterion Capital, D Draft Construction Management Plan by SISK, Drainage Strategy v2 by Pinnacle, Basement Impact Assessment v2 by Pinnacle, 30480/D1F Transport Statement by TPP, Planning Statement by Bilfinger GVA, C Design & Access Statement by Proun, By Hoare Lee; REP-1005840-CAR-15060 Air Quality Assessment, Air Quality Planning Checklist, REP-14401010-11A-JN-20150505 B Energy Strategy, 651\_376 BREAMM Pre-assessment dated September 2015, 1010-ICC-080515-11-01 Summary of MEP System and BRUKL Output Document, email from Ben Edwards dated 24/11/15

Applicant:	Agent:	
	Tom Edmunds	
Central London Investments LTD	Bilfinger GVA	
C/O Agent	65 Gresham Street	
	London	
	EC2V 7NQ	
DECOMMENDATION OUMMARY Over the substitute of the province of the control of the Control		

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to Section 106 agreement

## **ANALYSIS INFORMATION**

Land Use Details:			
	Use Class	Floorspace	
Existing	Sui Generis (Car Park)	6,623sqm (GIA)	
Proposed	C1 - Hotel	6,623sqm (GIA)	

#### OFFICERS' REPORT

This application is reported to Committee because it is a major development involving change of use of more than 1,000sq. metres of floorspace [clause 3(i)] and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(vi)].

## 1. SITE

- 1.1 The site is occupied by a large detached 20<sup>th</sup> century brutalist building bound by Great Russell Street to the South, Adeline Place to the East, Bedford Avenue to the north and Tottenham Court Road to the west. It is within the Central Activities Zone (CAZ) as defined by the London Plan, and as such the surrounding area is characterised by a mix of uses including commercial, residential, cultural and leisure uses.
- 1.2 The upper floor of the building is the existing St.Giles Hotel which is accessed from Bedford Avenue and the YMCA which is accessed from Great Russell Street, adjacent to the pedestrian entrance to the car park. To the east, there are hotels on Great Russell Street. Neither the YMCA nor St Giles Hotel form part of this application.
- 1.3 The ground floor of the building is primarily comprised of retail, food and drink uses (A1,A2 and A5). The YMCA gym is accessed by an entrance on Great Russell Street and extends into the upper basement levels. The Bedford Avenue frontage is taken up by St.Giles Hotel whose rooms occupy the upper floors in a series of tower elements. Servicing and access points are distributed around the building with the Adeline Place frontage dedicated to this purpose.
- 1.4 The existing building is not listed, and the site is not located within a conservation area although the Bloomsbury Conservation area borders the site to the north, east, and south along Bedford Avenue, Adeline Place and Great Russell Street respectively. This section of Tottenham Court Road is a central London Frontage.
- 1.5 The application site has an excellent level of accessibility, illustrated by a Public Transport Accessibility Level (PTAL) of 6b, which is the highest possible rating. The site is within close proximity to Tottenham Court Road Station which will provide links via the new Crossrail line. In addition to this the site is also within close proximity to Goodge Street, Holborn and Russell Square Stations offering links to the Central, Piccadilly and Northern lines respectively.

#### 2. THE PROPOSAL

- 2.1 Permission is sought for a change of use from a public car park (Use Class sui generis) to underground hotel (Use Class C1) with 166 rooms. The total floor space would remain unchanged. The proposal would result in the loss of all 140 existing off-street car parking spaces, with none re-provided. 17 of the rooms (10.2%) would be wheelchair accessible.
- 2.2 The application is for a windowless 'pod' hotel, which is the first of its kind within Camden, but there are other similar proposals in London which have been granted planning permission within London at Piccadilly Circus and Liverpool street (in operation). The hotel is aimed at budget visitors. The draft management plan identifies the hotel as filling "a gap in the market for simple, "essential service" with eco-friendly hotel accommodation. The hotel is a design led contemporary experience offering value for money and always

exceeding guest expectations." The applicant confirms that they would not be applying for an entertainment license nor an alcohol license and the proposed booking system would not allow more than 3 consecutive nights stay per guest. The hotel would be a single planning unit, separate from the upper level uses and would not include any café, bar, pub nor restaurant uses(A3, A4, A5). It is also confirmed that around 55% of the guests would be business users and the remaining 45% would likely be tourists and general visitors looking for very short term occupancy.

- 2.3 The following works are proposed:
  - Internal fit out works at basement levels -4 and -5 including,
    - o 166 standard hotel rooms (approx. 10sqm/room).
    - o Ground floor concierge desk with security
    - The existing two crossovers serving the carpark access ramps from street level would be removed and the footway reinstated. It is intended to retain the exit ramp for the transfer of goods (i.e. linen/refuse) between ground and basement levels using a small electric vehicle.
    - o 17 wheelchair accessible rooms (approx. 14sqm/room).
    - Cycle parking would be provided within the building and on the street
    - o 121sqm communal entrance hall (two storeys in height) with check in facilities, communal seating areas and internet stations and levels -4 and -5.
    - 108sqm staff area including showering facilities, change rooms, staff room, kitchen, office and luggage store.
    - Associated service and storage areas.
  - The proposal requires minor excavation at level -5 to provide lift underrun services. The additional excavation would have dimensions 5.7m (L) x 4.3m (W) x 1.35m (D), a total area of 24.5m<sup>2</sup> and volume of 33.1m<sup>3</sup>.
  - Ground level alterations on Adeline Place including:
    - o Converting the southern vehicular entrance to a cycle and waste storage area.
    - o Infill existing vehicular entrances with new wall, air intake vents and doors.
  - Ground level alterations on Great Russell Street including:
    - Converting the existing car park pedestrian access to a new hotel entrance with lift foyer.
    - o Replacement glazed aluminium framed shop front including double doors.
    - New cladding and fascia board for future signage.
- 2.4 During the course of assessment the proposal underwent substantial changes in response to concerns raised by the consultees and Council officers. The changes and new material are as follows:
  - New application form.
  - Revised drawing showing amended condensing unit and district heating platform.
  - Revised Basement impact assessment.
  - Revised draft hotel servicing management plan and construction management plan.
  - Revised design & access statement.
  - Revised existing and proposed elevations.
  - Amended ground floor plan with cycle parking and revised drawing of common area on floor -5.
  - Revised notice and schedule of adjoining properties.
  - Amended Design & Access statement.
  - Revised BREEAM assessment report.
  - Revised proposed elevation drawings to Adeline place

## 3. RELEVANT HISTORY

## Application site: 2013/5075/P

- 3.1 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. **Refused** 26/09/14.
- 3.2 The application was refused on two substantive grounds:
  - No. 1. Failure to demonstrate that the ventilation equipment necessary to ensure acceptable amenity for future occupants can be wholly contained within the building. In the absence of such information the proposals are likely to have an unacceptable impact on the amenity of the occupants, the external appearance of the building and the character of the area.
- 3.3 No. 2. Failure to demonstrate that the proposals have been designed in accordance with the energy hierarchy (in particular with regard to stage 2 consideration of Combined Heat and Power) and would achieve a BREEAM level of 'very good' and carbon reduction savings of at least 20% on an agreed baseline. In the absence of a s106 legal agreement securing the necessary sustainability measures including a post-completion BREEAM certification, the development would fail to make the fullest contribution to the mitigation of and adaptation to climate change.
- 3.4 See 'amenity and 'sustainability' sections below for how these issues have been addressed.
- 3.5 The application was refused for 7 reasons relating to the need for a planning obligations:
  - Hotel management Plan.
  - Car-free agreement.
  - Construction management plan.
  - Improvement to the forecourt and adjacent public highway, including the removal of redundant vehicular crossings and reinstatement of the footpath in Adeline Place.
  - Contribution to secure pedestrian and environmental improvements.
  - Secure apprenticeships, an employment training strategy and local procurement.
  - Public open space contributions.
- 3.6 The latest submission includes a draft s106 agreeing to meet the above and additional heads of terms as outlined in the conclusion of this report.

## 4. CONSULTATIONS

## Original

Number of letters sent	40
Total number of responses	179 (Including 142 in a petition and a number
received	from the same occupier/sender)
Number in support	1
Number of objections	178 (Including 142 in a petition and a number
	from the same occupier/sender)

Number of letters sent	67
Total number of responses	34
received	
Number in support	19
Number of objections	14 Including a number from the same
	occupier/sender)

# Comments on the first round of consultation

# **Statutory Consultees**

4.1 Thames Water – No objection

A suitable condition is advised to require a Drainage strategy to be submitted and approved by the local planning authority in consultation with the sewerage undertaker.

## **Local Groups**

4.2 Bloomsbury Association – Objection

Extensive correspondence has been received from the Bloomsbury Association with regards to;

- Over development
- Environmental impact
- Transport statement and related issues
- Public health and safety
- Operational issues
- Wider impact
- Refuse storage
- Fire safety
- 4.3 The Bloomsbury Association engaged the Waterman Group to review the applicant's submission 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. Reviewing the Air Quality Assessment, Sustainability and Energy Statements, they conclude that it is not clear how extracted air would be treated to ensure the amenity of adjoining residents and pedestrians on the street in terms of flow rates and temperature of the exhaust gas.
- 4.4 Fitzrovia Neighbourhood Association Comment
  - Does not appear to have proper drawings showing Adeline Place and Great Russell Street elevations.
- 4.5 Transport for London No objections in principle on this proposal, but recommend the following
  - A £200,000 financial contribution with land is sought for an additional Cycle Hire docking station to help alleviate the current over-capacity issue in the area which will directly benefit the guests and staff.

- A requirement to contribute to Cross Rail project.
- Conditions/s106 obligations should also be imposed to secure the cycle parking, provide a Construction Management Plan and avoid delivery and servicing trips taking place at peak hours, and to liaise and agree work methods with London Underground.
- 4.6 Crossrail No comment.
- 4.7 Lead Local Flood Authority There is no known risk of surface water flooding in this area.

# **Adjoining Occupiers**

4.8 Objections from local residents

**Bedford Court Mansions on Bedford Avenue/Adeline Place**; No. 43a(x2), 45 (x2), 51, 77, 83 (x2), 92, 102, 104(x2), 111, 112 (x2), 113, 117, 118, 121, 128, 132; **Bedford Square**; A homeowner of No. 40; **Adeline Place**; No.12A, 14 **Montague Street**;29A and; **Anonymous** (x3).

Issues raised;

# Transportation, servicing and highway

- Traffic and congestion
- Coach drop offs
- Loss of car parking
- Pedestrian movement increase
- Increase in services required (waste etc)
- Congregation of people

# Use

- Precedence for other similar developments
- Intensification of use
- Too many hotels in area
- Overdevelopment
- Increasing 24-Hour operation
- Operation issues
- Use should not be near residential area
- The draft hotel servicing management Plan is vague

# **Amenity**

- Noise, vibration and dust
- Impact on Health & Safety
- Anti-social behaviour
- Residential amenity impacts
- The noise monitoring data used to inform the Noise Impact Assessment is flawed

## Design

- Impact on adjoining conservation area and listed buildings
- Detailed elevation drawings should be submitted to provide sufficient clarity

#### Other issues

- Adverse economic impact
- Environmental impact
- More extensive consultation should be undertaken with the local community
- Contrary to the EIA Regulations
- Inconsistencies in the named applicant, creating concern whether the correct service of notice has been undertaken in accordance with Article 13 of the GMPO;
- The Applicant has failed to engage with the local community and has not submitted a PreApplication Consultation Statement, which is a validation requirement for major planning applications;
- The Applicant has not submitted a Crime Impact Assessment

# 4.9 A petition was submitted by Bedford Court Mansions.

142 signatories objecting to the proposed development :

- Over development of the site
- Concerns with the air intake and extract plant machinery
- 24 hours a day, 365 days a year usage and encourage the night-time economy
- Proposal is not sustainable or manageable
- The servicing of the site
- No way to ensure any future owner will adhere to any agreed plan
- Not all guests will arrive by foot from Tottenham Court Road station
- · Loss of off street public car parking
- Issues with regards to crime, security and safety
- The plant wall proposed at street level on Adeline Place, would erode the qualities of the Bloomsbury Conservation area

# 4.10 YMCA - Comment

In principle does not object to the proposed development of the existing car parking space in the lower basement levels of 112 Great Russell Street.

Our specific concerns are as follows:

- Structure
- Business Critical Mechanical and Electrical Services
- Waste Water
- Emergency Escape
- General Disturbance

## 4.11 The Bedford Estates— Object

- Environment would decline as proposed development would result in increased pedestrian and vehicle movement, pollution, noise and waste
- Increase in crime, littering and loitering
- Noise from ventilation equipment
- Pressure on drainage system

# 4.12 St.Giles Hotel - Object

Overdevelopment of the site

- Traffic implications
- Existing and proposed services
- Environmental health

# 4.13 Murdoch associated on behalf of Grosvenor Casino- objects

- Loss of the car parking and the effect that this will have on their business and other businesses in the building and that remains the case now.
- 4.14 Gordon Dadds Solicitors (on behalf of a resident and Bedford Court Mansions) -Objection
  - It would be over development of the site for a single hotel use.
  - Erosion of the interface between two distinctly different areas of urban development: the Bloomsbury Conservation Area and the commercial corridor of Tottenham Court Road.
  - Loss of off-street car public parking and the effects this will have on businesses and on the demand for on-street parking.
  - Planning precedent for other car parks in Central London.
  - 24-hour use and encouragement for the nighttime economy to extend out of Soho and Covent Garden.
  - Intensification of pedestrian movement, 24/7 with the lack of capacity on the public footpaths at the points of contact with the surface that would harm pedestrian movement.
  - Incompatibility with the Council's ambitions for Tottenham Court Road, which are to improve it and make it more pleasant and of the Council's West End project to create a high quality public realm.
  - Intensification of servicing and refuse collection.
  - Detrimental environmental impact to an extent that it cannot be effectively managed by condition.
  - Intensification of noise from air-conditioning and ventilation plant, again already a severe problem.
  - Adverse impact on air quality in the vicinity of residential buildings.
  - Failure to meet the Council's targets for sustainable development.
  - The threat to public health, safety and security.
  - Impact on residential amenity and quality of life without any economic benefit.
  - Adverse economic impact on the prosperity of other hotel businesses in the area.
  - Impact on the setting of listed adjoining listed buildings.

#### Councillors

- 4.15 Councillor Francis and Councillor Madlani Object
  - Underground hotel is not appropriate
  - Issues regarding applicant and hotel companies in complying with regulatory regimes
  - Vastly increases footfall
  - Adjacent to Bloomsbury Conservation Area
  - Reduces the amount of parking off-street and on-street for residents
  - Create traffic and congestion creating additional disturbances for residents
  - Increase in rooms would lead to more people in the area
  - Proposed extraction and ventilation systems in the plan would make air quality worse and would create a lot of noise
- 4.16 London Assembly member for Barnet and Camden, Andrew Dismore- Object

- Over-development
- Increase occupancy
- All servicing would be on Adeline place 24 hours a day, 7 days a week
- Loss of off street parking
- Affect small business
- Impact on residential amenity
- 4.17 Member of Parliament for Holborn & St Pancras, Kier Starmer Object
  - Transformation of basement into more hotel rooms represents over development of a small space.
  - Uncertainty around environmental impact of development-Residents of Adeline Place are concerned about impact of development on their area and feel sufficient consideration has not been given to their concerns.
  - Uncertainty with regards to transport used by guests staying in the extra rooms. There are already issues with on street parking and refuse collection in the local area.
  - As use of the Hotel intensifies so will anti-social behaviour, in an over-crowded area. Linked to this environmental and health impacts of the increase motor vehicles in an underground area. Opening Adeline Place to additional guests can only add to these pressures.
  - Planning permission is bound to the property, not the occupier. Therefore a s106
    agreement is not suitable for the development as a future owner may not feel bound to the
    management plan.
  - The development would have an impact on the local economy of two areas-Bloomsbury Conservation Area and the commercial corridor of Tottenham Court Road. By increasing local traffic and activity will encourage night time activity to expand out of Soho and interrupt business model of existing hoteliers.

# **Comments following reconsultation**

The applicants has submitted new and revised material as outlined above, the application went out for consultation and a site notice was re-displayed.

## **Local Groups**

4.18 Bloomsbury Association – Object

Further correspondence from the Bloomsbury Association as follows:;

- Issues still stand from the previous letter
- Application submission issues
- Concerns with regards to the community consultation exercise
- The submitted documents are not clear as identified by the Waterman Group, i.e proposed M & E and BREEAM assessment
- Concerns with Crime
- Issues with fire safety
- Proposal would create over-development for a single use hotel
- Noise Impact Assessment has resolved issues from previous survey
- Cumulative impact with regards to refuse and servicing with nearby business such as VQ
- Economic impact on the prosperity of established hotel business

- 4.19 Fitzrovia Neighbourhood Association Object
  - There is already a large hotel on this site and Great Russell Street already has at least two other hotels within 100 metres of the site
  - There is a large number of neighbouring residents whose amenity would be harmed by additional hotel use.
- 4.20 Bedford Court Mansions Ltd Object
  - Intensification of use
  - Increased vehicular traffic associated with deliveries and refuse removal.
  - Increase in noise emissions and decrease in air quality
  - The loss of the car park makes no sense
- 4.21 Bloomsbury CAAC Comment
  - Loss of amenity and impact on the setting of the Bloomsbury Conservation Area by the proposed unsightly alterations to the North East elevation

## **Other Bodies**

- 4.22 Transport for London No additional comments to the original comments
- 4.23 The Crime prevention officer from the Met Police Submission is lacking some detailed information of security measures
- 4.24 Police Constable from the local Bloomsbury policing team No objection
  - The hotel would deter drug users from the area with its increase in footfall
  - Existing car parks attract criminals due to unattended property left in vehicles and leads to a rise in theft from motor vehicle offences and criminal damage offences
  - Proposed use would remove the problems created by the existing car park which is heavily
    used by rickshaws where a number of road offences are committed in order for these
    rickshaw users to get to the car park

## **Adjoining Occupiers**

4.25 **Bedford Court Mansions on Bedford Avenue/Adeline Place;** 104, 112A, 113, 117, 118, 121 and 1 anonymous, objects for the following issues;

## Transportation, servicing and highway

- Traffic and congestion.
- Coach drop offs.
- Loss of car parking.
- Pedestrian movement increase.
- Congregation of people.

#### Use

- Intensification of use.
- Overdevelopment.
- Use should not be near residential area.

# Amenity

- Noise, vibration and dust.
- Impact on Health & Safety.
- Anti-social behaviour.
- Residential amenity impacts.

## Design

Visual impact.

## Other issues

No fundamental change from previous scheme.

# 4.26 St.Giles Hotel - Object

- Overdevelopment.
- Servicing of the hotel and environmental impacts.
- Issues with the application.
- Ownership of land may affect access on Adeline Place.
- 4.27 Gordon Dadds Solicitors (on behalf of a resident and Bedford Court Mansions) Object
  - Points from original letter still stand.

#### **Members**

- 4.28 Councillor Glanz (City of Westminster Council) Object
  - Westminster's boundary with Camden is at the bottom of Tottenham Court Road and therefore close to and, potentially affected by, the development.
  - Previously expressed concern in relation to earlier iterations of very similar schemes relating to the site and continue to have those concerns in relation to the current proposal
  - Fully recognise the need for more and better hotel accommodation in Central London to cope with a growing population and increase in tourism I strongly believe that such accommodation must be of an appropriate standard and quality to reflect London's position as an international global city.
  - Underground rooms without natural light reliant on artificial lighting and ventilation does not meet such criteria and reflect badly on London.
  - Whilst a use should be found for the space this is not the appropriate one and unless tightly managed could lead to a further increase in issues associated with crime and anti-social behaviour related to drugs and prostitution.
  - Application is inappropriate and because of potential adverse effect on nearby residential amenity.

## Letters of support

- 4.29 19 letters of support from 19 signatories from were submitted for the following reasons;
  - Redevelopment of an underutilised car park that brings little economic or environmental benefit to the area.
  - The creation of 24 much needed local jobs.
  - The associated economic benefit to the area of the increased footfall due to location and nature of hotel

#### 5. POLICIES

# **LDF Core Strategy and Development Policies**

## Camden LDF Core Strategy 2010

- CS1 Distribution and growth
- CS2 Growth Areas
- CS5 Managing the impact of growth and development
- CS7 Promoting Camden's centres and shops
- CS8 Promoting a successful and inclusive Camden economy
- CS9 Achieving a successful central London
- CS11 Promoting sustainable and efficient travel
- CS13 Tackling climate change through promoting higher environmental standards
- CS14 Promoting high quality places and conserving our heritage
- CS15 Protecting and improving our parks and open spaces and encouraging biodiversity
- CS17 Making Camden a safer place
- CS18 Dealing with our waste and encouraging recycling
- CS19 Delivering and monitoring the core strategy

## **Camden Development Policies 2010**

- DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- DP14 Tourism development and visitor accommodation
- DP16 The transport implications of development
- DP17 Walking, cycling, and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP19 Managing the impact of parking
- DP22 Promoting sustainable design and construction
- DP24 Securing high quality design
- DP25 Conserving Camden's heritage
- DP26 Managing the impact of development on occupiers and neighbours
- DP28 Noise and vibration
- DP29 Improving access
- DP31 Provisions of, and improvement to, open space and outdoor sport and recreation facilities
- DP32 Air quality and Camden's Clear Zone

## **Supplementary Planning Policies**

# Camden Planning Guidance (updated 2015)

CPG1 Design

CPG3 Sustainability

CPG6 Amenity

CPG7 Transport

**CPG8 Planning obligations** 

## Strategic and Government Policy

The London Plan 2015 (consolidated with alterations since 2011) National Planning Policy Framework (March 2012)

#### Fitzrovia Area Action Plan 2014

#### 6. ASSESSMENT

The principal consideration material to the determination of this application and summarised as follows:

- Principle of development Land use
- Design
- Basement
- Amenity Impact
- Standard of Accommodation
- Highways, Transport, Traffic, Parking & Servicing
- Sustainability
- Planning Obligations

## Land use: New Hotel use

- 6.1 The proposals involve change of use of the existing car park (sui generis) and do not involve any extensions or additions to existing floorspace. Policy DP1 expects relevant development in the Central London Area to contribute a mix of uses, including housing. However in this instance the proposals do not involve new build development or extensions and therefore DP1 does not apply.
- The Mayor of London's Economic Development Strategy seeks to promote London as the world capital of business, the world's top international visitor destination and the world's leading international centre of learning and creativity (para 4.9). Improving the availability of hotel accommodation in sustainable locations is seen as central to achieving these objectives and to ensure adequate hotel provision Policy 4.5 of the London Plan sets a target of 40,000 net additional hotel rooms by 2031, and 2,500 hotel rooms in LB Camden between 2007 and 2026. Camden's Annual Monitoring Report 2010/2011 lists a net increase of 628 new hotel rooms in the last 5 years.
- 6.3 This strategic approach is reflected at a local level whereby Policy CS1 (Distribution of Growth) seeks to promote a concentration of development in the Tottenham Court Road Growth Area and in other highly accessible locations. Policy CS9 (Achieving and successful central location) of the Camden Core Strategy recognises that in order to achieve a successful central London economy, the Council supports future growth in hotels as well as seeking to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area. This is re-iterated in Core Strategy Policy CS8 (Promoting a successful and inclusive Camden economy) which recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health. FAAP Principle 8 identifies Tottenham Court Road area as a suitable place for hotel accommodation.
- Policy DP14 (Tourism Development and Visitor Accommodation) states that the Council will support tourism development and visitor accommodation by expecting new, large-scale tourism development and accommodation to be located in Central London. This would be subject to the accommodation being easily reached by public transport, providing pick-up/set-down points for taxis and coaches and not causing harm to the local mix of uses and character and the amenity of local residents. These concerns are addressed in the remaining sections of this report.
- 6.5 The hotel would contribute to a successful and vibrant centre with a new use that adds to the variety of central London accommodation choices and supports the continued growth of the sector and related employment in accordance with policies CS7 (Promoting Camden's centres and shops) and CS8 (Promoting a successful and inclusive Camden economy).

The proposal would result in 24 FTE additional employment opportunities. In keeping with the requirements of policy CS8, employment training strategy, apprenticeships, and local labour and procurement would be secured via legal agreement.

- 6.6 The NPPF seeks to promote a strong, responsive and competitive economy and as such the economic impact on existing hotels in the area is not considered to be relevant.
- 6.7 A residential use, which would be the only other priority land use in this location, would not be acceptable underground therefore a condition is proposed requiring the hotel to be retained as a single planning unit and for the purpose of short-term, temporary accommodation only.
- 6.8 Similar planning permissions for 'pod' hotels were given approvals at Westminster (Trocadero in Piccadilly) and Tower Hamlets Council (Tune Hotel at 13-15 Folgate Street) in recent years. The latter is currently in operation. Overall it is considered that this is an appropriate location for a new hotel use, subject to transport and amenity considerations as assessed below.

# Land use: Loss of public car park

- 6.9 The proposals involve the change of use of the existing car park (sui generis) to Hotel (C1) use.
- 6.10 Being located less than 100m from Tottenham Court Road Underground station as well as being within reasonable walking distance of 7 other London Underground stations. According to TfL, the site is also extremely well served by buses and the site holds the highest Public Transport Accessibility Level (PTAL) of 6b, on a scale of 1-6, meaning the site has excellent accessibility to public transport. It is located in controlled parking zone Holborn & Covent Garden (CA-C), which is highly pressurised and has 108 permits issued for every 100 residential bays available. On-street parking in the local area consists mainly of permit parking and Pay & Display bays on Great Russell Street, Adeline Place and Bedford Avenue. These pay and display bays have a maximum stay of 2 hours and therefore would not be practical for the use of any guest staying at the hotel. controlled parking zone CA-C operates between Monday and Saturday from 08.30 to 18.30. The restrictions on this CPZ will mean that it would also be highly limiting for any guest of the hotel to park in these bays. Double yellow lines restrict parking on Adeline Place and single vellow lines are in existence on Great Russell Street, which will allow access for disable users to the hotel.
- 6.11 The current use of the site provides car parking on two levels. There are 140 spaces of which two are disabled bays. The Bloomsbury Association comment that; "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." However based on information provided by NCP, the average daily occupancy of the car park is 57% or approximately 80 vehicles per day. Subsequent spot assessments of daily levels of occupation identified 51% and 35% occupancy levels on site, and 49% occupancy at nearby Selkirk House carpark. The transport statement which supported the recently approved change of use of the Upper Woburn Place NCP carpark also found that there is considerable surplus of car park spaces within the immediate area. (reference 2015/2811/P).
- 6.12 The LDF strongly seeks to create a modal shift away from car use in this busy central area. This aspiration is supported by projects such as the West End Project. The loss of this

private parking is considered to be acceptable in principle and will help to reduce private vehicle use in the area and will contribute to creating a more pleasant area for those who chose more sustainable modes of travel.

- 6.13 Furthermore TfL welcome and support the car free nature of this proposal. They comment that there are other private car parking options in the vicinity of the site that would cater for those who still felt it necessary to drive to the area. 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).
- 6.14 Given the alternative availability of parking in the area, and the high transport accessibility, the loss of these car parking spaces and any recent cumulative loss of spaces is not considered to have a significant 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'. The transport section below assesses the remaining transport concerns and policy requirements.

# Land use: Overdevelopment, intensification of use

- Objections have been raised about the proposals constituting overdevelopment. The 6.15 London CAZ is identified as a focus for growth and the proposal seeks to make full and efficient use of the site including higher density development in accordance with Camden policy CS1 as well as London Plan 2011 policy 2.13 'Opportunity Areas and Intensification Areas'. The CAZ is considered to be an appropriate area for such 24 hour uses. The nature of the use would change significantly: from activities arising entirely from vehicle based movements to activity arising from more sustainable transport means. The primary access point would also relocate from Adeline Place where it is closest to nearby residential uses to Great Russell Street which is further away from sensitive local uses. The new use would be an intensification of activity, providing a better use of space arising from the increasing redundancy of inner city carparking. However the hotel would not provide space for ancillary functions such as entertainment, bars, restaurants and therefore would not host conferences, weddings or more 'intense' gatherings or activates generally associated with hotels and more likely to lead to disturbances. The controls on guest numbers and booking arrangements are discussed further in the section on local amenity below.
- 6.16 Given the site's location within the CAZ on the edge of the Tottenham Court Road Growth Area and alongside transport hubs, it is evident that the application site is in a sustainable and highly accessible location where the provision of hotel accommodation can be supported.
- 6.17 It is considered that the intensification of activity on the site, within existing floorspace, does not constitute overdevelopment. The proposal is not considered to result in an unacceptable precedent as the proposal is unique and notwithstanding, all development is assessed on its own merits. Further to compliance with national and regional policy, a hotel in this location would also accord with LBC's development plan in principle as Policies CS1, CS9 & DP14 seek to direct land uses of this type to highly accessible areas. Overall, it is considered that the application site is in a good and accessible location that would provide much needed hotel accommodation to improve London's tourism and business offer, subject to consideration of the matters below.

- 6.18 Given the subterranean nature of the development, the change of use will not impact upon the levels of daylight and sunlight within the vicinity of the site. In addition to this, there will be no issues with loss of local residential privacy due to the windowless nature of the hotel.
- 6.19 DP14 requires that new hotels should not harm the balance and mix of uses in the area, local character, residential services or amenity. Consideration of any amenity impacts to neighbours is also a requirement of policy CS5 'Managing the Impact of Growth and Development', CS9 'Achieving a Successful Central London' and DP26 'Managing the Impact of Development on Occupiers and Neighbours'
- 6.20 The nearest residential neighbours to the site are the properties on the opposite side of Adeline Place approx. 17m from the car park vehicle entrance/exit. Further to the north there is a concentration of flats at Bedford Court Mansions on the corners of on Bedford Avenue and Adeline Place.
- 6.21 The hotel includes a ground floor reception area and a larger basement level lobby which would act as an arrivals/departures area for guests, thereby reducing the likelihood of congregation on the footpath. It is acknowledged that there would be late night comings and goings from the site, with some degree of associated outdoor smoking and congregation., Whilst there are already a number of hotels in the area, this is set within the context of the high density of land uses in this part of Central London generally and the focus of any congregation is likely to be on the Tottenham Court Road end of the site, closest to the entrance.
- 6.22 It is noted that an increase in the number of hotel guests may lead to an increased number of trips to and from the site, both in terms of road and pedestrian traffic. Objections have been received to the previous and current application from the residential units opposite Adeline Place. Concern was raised from the Bloomsbury Association and other objectors about the impact of visitors and staff loitering around the service area on Adeline Place.
- 6.23 A Crime Impact Assessment has been carried out and submitted. The Bloomsbury Association has concerns with the Crime Impact Assessment appears to have mainly considered the underground parts of the building and its entrance from Great Russell Street. Conventional internal hotel security measures have been included within the design. The submitted Hotel Management Plan was revised during the course of the application. It outlines the types of measures that will be applied to minimise the impact on nearby properties, such as: delivery and servicing plan times and an antisocial behaviour strategy.
- 6.24 The Bloomsbury local policing team have looked at the concerns from the Bloomsbury Association and the local residents in relation to potential anti-social behaviour that could be caused in the area by hotel guests. They consider that the measures in the Hotel & Servicing Management Plan demonstrate that staff/security will be trained to deal with this, also there would be no restaurant/bar so other potential issues relating to drunk/disorderly matters should not originate from the hotel.
- 6.25 Historically, car parks attract a low level of criminal activity due to unattended property left in vehicles and leads to a rise in theft from motor vehicle offences and criminal damage offences. The hotel would have a single guest entrance with a lift that goes down to the reception area, this would greatly help identify trespassers and criminals as they will have to pass through this level of security to get to the main hotel complex.
- 6.26 The Bloomsbury policing team state that overall, this part of Bloomsbury suffers from drug related issues such as drug use in quiet low footfall streets so having the hotel nearby will increase the footfall and deter drug users from wanting to be in the area. Also there would

be a reduction in local road offences committed by cycle rickshaws which have used the car park as a storage area in the past and often gain access by riding the wrong way down a one way street and using a no entry route.

- 6.27 The Crime prevention officer from the Met Police commented that draft hotel servicing management plan sets out the heads of terms for the operator to address in the final hotel servicing management plan. It is intended that further consultation will be sought with Camden and relevant third parties such as the Met Police and The Bloomsbury Association.
- 6.28 The-5 Floor Plan 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. A security guard would be located at the main entrance to the Hotel between the hours of 7pm and 7am. CCTV cameras will monitor all guest and service entrances along Great Russell Street and Adeline Place.
- 6.29 The revised drawings show that the proposal includes a wide variety of facilities for staff at basement level which is considered to be sufficient to reduce the number of staff outside the building to those who need to smoke.
- 6.30 Overall, it is considered that the proposal would not unacceptably impact safety, security, illegal drug use/sale or other crime in the area. Nor would it give rise to significant harm to local amenity, due to the mitigation and controls measures set out in the Hotel Management Plan. As such the proposal is considered acceptable in terms of policies CS5, CS17, DP14 and DP26 of the LDF and Camden Planning Guidance.

# Impact on amenity: Plant operation noise

- 6.31 Following the initial submitted noise measurements which were conducted in March 2012, a revised Noise Impact Assessment Report was submitted by Hawkins Environmental on behalf of the applicants in November 2015. This was based on readings taken in October 2015 which were overseen by consultants Sandy Brown who have been engaged by the Bloomsbury Association.
- 6.32 The revised report was prepared to respond to the comments from the Bloomsbury Association, specifically relating to the methodology of the noise survey and assessment, the adequacy and range of plant to be assessed, as well as noise from pedestrians and traffic. The scope of the plant noise assessment has been increased and the expected cumulative noise level has been determined and the assessment shows that through the implementation of standard acoustic control measures, noise from the plant will adhere to Camden's Policy DP28 on noise.
- 6.33 Acting on behalf of the Bloomsbury Association, Sandy Brown reviewed the revised noise impact assessment and concluded the following:
  - Noise egress assessment will need to be redone, which is typical. Approval of this should be required by condition.
  - The generator's operation needs to be clarified.
  - Overall, that the new survey has resolved a number of concerns associated with the previous survey.
- 6.34 The environmental health noise team have assessed the submission and the revised noise impact assessment and offered no objections subject to conditions requiring confirmation that the expected noise levels are met by the plant and emergency generators

- before the use commences, and the plant/ machinery equipment prior to commencement of the development.
- 6.35 It is considered that the report has adequately demonstrated that it would be possible for the plant equipment associated with the proposal to comply with the requirements of DP28. Notwithstanding, conditions are recommended prior to occupation to ensure that the noise criteria are met, in accordance with DP26 and DP28.

# Impact on amenity: Servicing, refuse and coach parking

- 6.36 It is proposed to service the development from Adeline Place where double yellow lines are in existence along the site frontage. These 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.
- 6.37 The hotel will be serviced using the existing car park ramp off Adeline Place. A small electronic vehicle, which will remain in the ramp service area, will transport goods from the ground floor service entrance before depositing the goods in a designated service area at Level -4. In addition, there will be an internal service lift between Level -4 and -5. These arrangements will reduce the loading /unloading time of the service vehicle and limit the amount vehicles will wait on the public highway
- 6.38 The lack of any kitchen facilities on site removes the need for any significant food or beverage deliveries; this in turn will limit waste generation and the associated refuse collection trips. The service activity is expected to be as follows:
  - Up to 1 combined linen delivery/collection per day to be made by a transit size van;
  - $\circ$  1 2 refuse collections a week to be made by a private contractor; and
  - An ad-hoc delivery of vending supplies made by a small van. For robustness, one delivery a week has been assumed by the applicant.
- 6.39 In order to ensure that larger vehicles associated with the operation of the hotel are suitably managed and controlled, a Service Management Plan would be secured by s106 legal agreement. This is likely to be an annex to the Hotel Management Plan. This would include measures to manage (inter alia) the following issues:
  - servicing hours of operation (outside of peak times)
  - servicing vehicle approach and departure routes
- 6.40 Consultation responses have raised concerns with regards to the servicing hours, refuse storage and collection, servicing routes and location, coach parking and implications for the West End project. It is acknowledged that there are servicing and coach drop-off/collection issues in the wider area related to the operation of the St Giles Hotel and the new Ecole Jeannine Manuel School on Bedford Square. This has led to a number of complaints from local residents due to double parking, blocking of residents bays, roads and drivers leaving engines idle causing noise and pollution.
- A requirement to ensure that the booking system does not support guests as part of coach parties would be secured by s106 legal agreement, with appropriate measures such as a requirement to ensure bookings of no more than 8 people are supported via the booking arrangements in order to discourage coach parties arriving to the hotel and ensuring that the hotel would not advertise coach bookings. These measures would be covered within the Hotel Management plan.

- 6.42 Noise and disturbance attributable to taxis and minicabs would be primarily restricted to the Great Russell Street or Tottenham Court Road frontage, away from the majority of nearby residential uses. The transport statement is clear that a high proportion of the guests at the hotel would arrive and leave by sustainable transport means. Overall the proposals would lead to a significant modal shift of journeys associated with the site away from private vehicles to sustainable means of transport, which is welcomed.
- In order to ensure a maximum modal shift of visitors to this site to sustainable forms of transport Camden would require a strategic level Travel Plan to satisfy DP16 and Camden Planning Guidance; specifically CPG7 (Transport); this includes references to TfL and DfT guidance. The travel plan would need to be secured by a Section 106 planning obligation if planning permission is granted. The Travel Plan would involve measures to highlight the ease of accessing the site from public transport. A financial contribution of £6,020 would need to be secured to cover the costs of monitoring and reviewing the travel plan over a 5 year period. This would also be secured by section 106 planning obligation.
- 6.44 The Bloomsbury Association have concerns that refuse areas are not accessible for all users and collectors in a way that will minimise nuisance to occupiers, neighbours and the public. The refuse storage would be screened as it is behind closed doors and would be integral on the ground floor where it would not be visible from public viewpoints. It is considered that collection and users of the refuse storage would create less of a nuisance to neighbours and the public compared to the existing car park ramps that exist on this section of Adeline Place. The proposals include 3 x 1100 litre Eurobins which would be accessible from Adeline Place adjacent to the proposed cycle parking. This would be secured by condition.
- 6.45 Overall it is considered that the impact of the proposals on local residential amenity and the transport network can be mitigated, through a combination of the design and layout of the proposals with the entrance located on Great Russell St, and the use of the Hotel and Servicing Management plans.

#### Hotel: Standard of accommodation

- 6.46 It is a core planning principle of the NPPF (Paragraph 17), the London Plan (Policy 4.5), and the LDF (Policy DP26) to seek to secure a good standard of amenity for all future occupants of buildings.
- 6.47 Objections have been received about the nature of the underground hotel and the impact on guests from the absence of windows. However there is no specific planning policy or guidance precluding hotels in basements in terms of principle or amenity. Camden Policies DP22 and DP24 only refer to development being of the comfort of the short stay occupants. Further, CPG6 'Amenity' which refers to the BRE 'Site Layout Planning for Daylight and Sunlight' (Oct 2011) is generally applied to residential (Class C3) situations only.
- 6.48 Officers acknowledge that this *is* an unusual proposal for a hotel. The absence of windowless rooms is not an accommodation type that will be attractive to everyone and ultimately it would be up to prospective visitors to decide whether such rooms provide sufficient amenity for short stays. In order to ensure that guests do not stay for long periods of time a restriction to 3 nights per guest stay would be secured through the Hotel Management Plan.

Standard of accommodation: air quality

- 6.49 The air quality of the future hotel guests is fundamental to the acceptability of the proposals. Significant work has been undertaken by the applicant's air quality consultant's Hoare Lea to demonstrate that the development can meet air quality targets. Previous iterations of the hotel design sought to move air intakes to the upper levels of the St Giles hotel, however this has found to be impractical. The location of the air intake for the ventilation system is therefore proposed to be from the Adeline Place façade at the ground level. In order to ensure that the air is sufficiently high quality and to avoid the risk that the one hour NO2 objective may be exceeded it is recommended that a filtration NO2 scrubber is fitted to the air intake. This would be secured by condition.
- 6.50 The proposal will require extensive servicing equipment, including ventilation ducts for clean air and smoke purging, fans, air exchangers, water piping, waste and storm water pumping equipment, fire egress, lighting and electricity cabling. The existing smoke release ducts for the car park are in situ and shown on the plans, Details have been submitted with regards to the location and size of the other equipment which resolves the concerns from the previous application.
- 6.51 The Hotel would require mechanical ventilation heating and cooling. While not a reason for refusal of the previous application significant concern was raised by officers as to the ability of the development to accommodate, and provide sufficient access to, existing pumping infrastructure. The new submission shows the drawings all plant relating to the existing uses on the site, and show how access will be maintained to these areas for maintenance, and reports have been provided to demonstrate that all necessary services can be contained within the building. MEP services will be run within false bulkheads in the hallways leading to a large plant room.
- 6.52 As such the proposal appears to have overcome the previous reason for refusal. The current application outlines the scale and location of the equipment in the proposed plant room. The floor plans submitted addressed the previous concern as to illustrate all of the proposed equipment will be located within the building and the implications on the appearance of the building whilst meeting building regulations.
- 6.53 As mentioned above within the quality of accommodation paragraphs, there have been objections from the Waterman Group on behalf of the Bloomsbury Association with regards to air quality. 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. The applicant has accepted that that mitigation measures should be secured within the construction management plan as per the standard pro-forma as mentioned.
- 6.54 The submitted revised details provides further clarification regarding air quality concerns raised in The Bloomsbury Association and Waterman Group's objection letter, where it confirmed that the velocity associated with the flow rate of the exhaust air from the hotel ventilation system will be approximately 2.5 metres per second though the louvres. These louvres will be downward facing, with the exhausted air being directed through the bike store area. They concluded that; neither the velocity associated with the flow rate nor the temperature associated with the ventilation exhaust air is considered likely to result in a reduction in the amenity of pedestrians passing the service ramp.

Standard of accommodation: ceiling heights

6.55 In respect of ceiling heights, there are no prescriptive planning requirements for hotels. The proposed rooms would have headroom of 2.5m, in keeping with the standards normally considered acceptable for residential accommodation. While the corridors would have

headroom of 2.3m, they are transitory spaces. As such the floor to ceiling heights are considered to be acceptable.

Standard of accommodation: accessibility, building control & fire safety

- As a change of use to a hotel Part M of the Building Regulations will require this part of the Building to be upgraded to be accessible and respect of access for people with a disability as required by policies CS14 'Promoting High Quality Places and Conserving Our Heritage', DP24 'Securing High Quality Design' and DP29 'Improving Access' the proposal provide 17 fully wheelchair accessible rooms and thus achieves the target of 10% of total rooms.
- 6.57 The proposed hotel is accessed by two passenger lifts which are considered to be adequate given the scale of the hotel. It is recommended to require an accessibility management plan be provided prior to construction and that the accessible rooms and lifts be provided prior to occupation and maintained in perpetuity.
- 6.58 Disabled refuge spaces will be provided for the hotel providing a place where disabled occupants can take refuge prior to being evacuated. It is proposed that these are provided with communication to management for evacuation purposes. This appears to be acceptable on Adeline Place.
- 6.59 As the hotel operates on multiple basement levels it will be provided with firefighting shafts. Each shaft will incorporate a firefighting stair, smoke clearance and a dry main. A firefighting lift will also be provided as appropriate for each firefighting shaft concerned. The hotel would have 3 staircases leading up to the streets of Great Russell Street, Adeline Place and Bedford Avenue which is more than the building control requirement of 2.
- 6.60 Based on the above details, building control officers consider such fire safety provisions would be acceptable at the planning stage but state that an application to building control would be needed to be submitted and approved if it meets the functional requirements of the Building Regulations.

## Design

- Achieving high quality design and appearance as well as considering the impact upon the host building, street scene and the wider context, is a requirement of policies CS5 'Managing the Impact of Growth and Development', CS14 'Promoting High Quality Places and Conserving our Heritage', DP24 'Securing High Quality Design', DP25 'Conserving Camden's Heritage'.
- 6.62 The existing entrance on Great Russell Street will be refurbished. The external glazing will be replaced within the existing structural opening and new signage will be provided. The entry area is of limited size and will only provide the entry and exit route for guests with the main reception located at level -4.
- 6.63 The existing public vehicle entrance and exit points to Adeline Place would be closed to public access and the crossovers removed. Service access would be retained via the exit ramp however vehicles would no longer need to entre it from the street and this would therefore recover an area of pavement for wider pedestrian use. The ground floor frontage would be reconfigured to accommodate a new electrical substation, plant equipment, staff cycle parking, goods access and refuse storage.

# Ground floor frontages

- 6.64 The Fitzrovia Area Action Plan states that, "any redevelopment of the St Giles Hotel should improve the street frontage, with the ground floor addressing the street and including active frontages along Tottenham Court Road and Great Russell Street. Blank frontages and large servicing areas should be avoided".
- 6.65 The application site is not listed nor is it within a designated conservation area. However it is acknowledged that surrounding the site is the Bloomsbury Conservation area to the north, south and east across Bedford Avenue, Great Russell Street and Adeline Place respectively. To the south of the site across Great Russell Street is No.5 Great Russell Street and the Dominion Theatre which are both Grade II listed properties.
- 6.66 The proposed changes are considered relatively minor and would be typical to a commercial frontage within this street and area. The Great Russell Street pedestrian entrance would be replaced with a similar shopfront with a new fascia board for future signage (not the subject of this application) which is considered to be acceptable subject to condition requiring further design detail.
- 6.67 The site is not within the conservation area, however it is noted that Bloomsbury CAAC have objected due to the elevations on the north-east elevation which is Adeline Place. The applicants have submitted revised elevation drawings to address this. The elevation have been revised to bring more variation to the façade through the use of different materials and colours which aims to break up the elevation by giving the use of each area behind the elevation their own visual appearance.
- 6.68 Along Adeline Place the proposal would infill existing vehicular openings with vents and doors. This frontage is already 'service-based' in character and it is acknowledged that there is limited possibility of achieving an 'active frontage' along this elevation, due to the need to locate staff cycle parking, the sub station and other utilitarian uses along the elevation. However the existing ramp voids would be infilled and the frontage would provide more of a sense of enclosure to the street. Further details of the design and materials would be secured by condition.
- 6.69 This has been broken up into three areas; the Bike Store; the Service Ramp and Fire Exit (entrances and exits); and the Plant and Refuse Store. The main cladding material would be in Equitone fibre cement cladding panels. These have been designed to mirror the proportion of the banding and colour of the façade in the hotel building opposite, which is common to the conservation area. The Equitone panels will also complement the existing concrete façade in the Brutalist building.
- 6.70 The Bike Store would have a cream coloured door and window frame, which attempts to reference the buildings opposite and surrounding the site. The entrance gate to the service ramp has also been designed to be more open and is now less of a visual barrier into the space. A lighter grey is proposed for the entrance gate and the fire exit door to further break up the monotony of the façade. The louvered panels and doors would be in a darker grey colour to similarly match the colour of the existing window frames on the floors above.
- 6.71 Special attention has been paid to the desirability of preserving or enhancing the character and appearance of the conservation area, under s.72 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013 and of the setting and any features of special architectural or historic interest of the nearest listed buildings, under s.66 of the Act. The proposals would be low key with minimal prominence and would not have a detrimental impact on the character or

- appearance of the nearby conservation area nor on the setting of the nearest listed buildings.
- 6.72 With the above taken into consideration, the proposal is considered to be acceptable in design terms, the proposal would see modest works carried out to the front façades of the building, which is considered to respect the appearance, character, setting, context, form and scale of the neighbouring properties, conservation area and listed buildings in accordance with the requirements of DP24 and DP25.

#### **Basement**

6.73 Camden LDF policy DP27 generally requires that a basement impact assessment be included with any application involving excavation. The proposed additional excavation of 33.1m3 would represent an additional 0.1% compared to the existing 35,000m3 basement. As such the excavation is considered to have negligible additional impact when compared to the existing building. The application is accompanied by a Basement Impact Assessment (BIA) by Pinnacle consulting engineers. It concludes that the scope of work and would have minimal or no impact on the groundwater flows, land stability, surface flow and flooding. A full Basement Impact Assessment is not considered required on this scheme. TfL have requested a condition securing details of large electrical equipment proposed on the 4th and 5th floor basements in order to assess any potential impact on the operation of our tunnel's equipment. A suitably worded condition would be added.

Basement: waste water, drainage servicing and flooding.

- 6.74 Camden LDF policy CS13 states that development must avoid harm to existing drainage systems. The proposal would share the basement with the YMCA club which occupies Levels -1 to -3. The submission confirms that the YMCA club have stated that the equipment necessary to service their use is accessed from within the proposed hotel. This equipment includes sewer pumps.
- 6.75 The Local Lead Flooding Authority states that there is no known risk of surface water flooding in this area but is located in an area with a low chance of ground water flooding in any given year. In respect of Environment Agency flood maps, the property is outside of the defined floodplain for risk of flooding from rivers or sea, however, an exact flood risk category grade is not available for this individual site.
- 6.76 Policy requires that major developments to achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates, and developments to include SuDS unless considered inappropriate. This development would result in no change to the hard surfacing on the site. Due to the proposal's change of use at -4, and -5 floor level and isolated from the ownership and usage on the upper floors, it is not practical to meet these policy requirements. Thames Water request a condition to secure details of the foul and surface water connection points and peak flow rates to ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community. This would avoid adverse environmental impact in accordance with the requirements of policies CS5 and CS13 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 and DP23 of the London Borough of Camden Local Development Framework Development Policies.

Transportation, public highway and servicing

- 6.77 Policy DP21 (Development connecting to the highway network) requires that development avoids causing harm to highway safety or hinders pedestrian movement; contributes to the creation of high quality streets and public spaces; and repairs any construction damage to transport infrastructure. London Plan (Chapter 6) and Camden policies CS9 'Achieving a Successful Central London' and C11'Pormoting Sustainable and efficient Travel' seek to promote sustainable transport including walking, cycling and public and improvement to streets and places. Transport issues relating to the principle of the loss of the carpark, servicing and coach arrangements are dealt within the previous sections.
- 6.78 The contribution for the new cycle hire docking station would be £150,000 and this would be secured by the s106 agreement. An additional s106 clause require a feasibility study of the docking station on Adeline Place and the safe guarding of the necessary land to ensure to docking stations would be provided if it is found to be feasible. Such aspects would be needed to be discussed between the applicants and TfL. If such station is not feasible the above sum would be going towards other public goods such as the West End Project and public realm contributions in lieu.
- 6.79 The site fronts Great Russell Street however the building is also located on Tottenham Court Road which forms part of the Strategic Road Network (SRN). The closest part of the Transport for London Road Network (TLRN) is Euston Road located 1km north of the site.

# Cycle parking

- 6.80 Twenty four visitor spaces would be secured on proposed on Adeline Place and 8 staff spaces within the building in order to achieve the Camden and revised London Plan requirements for the proposed use. The staff parking does not meet Camden standards for staff parking, but due to the restrictions of the site and that this is an improvement from no facilities being available for staff currently, it is considered to be acceptable.
- 6.81 The development is likely to increase operational pressure on cycle hire in the area. TfL has highlighted that the nearest Cycle Hire docking stations are amongst the busiest on the network and operate at capacity or close to it. TfL comment they would normally welcome an additional provision of Sheffield stands within the public realm, however in this case TfL are seeking a financial contribution towards locating an additional Cycle Hire docking station adjacent to the proposal site. Officers are supportive of this approach.
- 6.82 However the site is within the scope of the Council's West End project, as acknowledged by the submitted Transport Statement. This will address a number of significant challenges including road traffic casualties, congestion, poor air quality, traffic dominance, insufficient space for high volumes of pedestrians and cyclists, and a lack of high quality public space. This development will benefit greatly from these works and will help offset the loss of private parking by continuing to shift trips made to more sustainable modes of transport. To assist with this goal and help facilitate this development a Pedestrian, Cycling and Environmental contribution is sought towards the West End Project for use in the immediate Bedford Avenue area. Discussions are currently ongoing with TfL to identify the optimal contribution that this scheme can make to improving the local transport and highway network and details of the financial contribution to be sought will be confirmed in due course. The contribution would be secured by s106 legal agreement.
- 6.83 Transport for London encourages developers to use the TRICS database (formerly TRAVL) for trip generation predictions. The applicant will be required to undertake a TRICS afterstudy and provide TfL and Camden with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various use categories associated with this development. We will seek to secure the

necessary after surveys and results by Section 106 agreement as part of the Residential Travel Plan review and monitoring process.

Construction Management Plan, public highway and the West End Project

- 6.84 A separate license would need to be sought from Highways Management for any required hoardings, skips or materials storage on the highway. The area to be fit out currently benefits from vehicular access, albeit it from small vehicles only, which can be used to minimise the impact on the public domain. Based on the difficulty of the works a Construction management plan and participation in the Considerate Contractors Scheme would be secured by way of a S106 legal agreement, in order to mitigate harm to the transport network.
- The applicant has submitted a draft Construction management plan, which is welcome. The Council's primary concern is public safety, and ensure that construction traffic does not create (or add to existing) traffic congestion. A key element of the construction management plan should address (amongst others) best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme.
- 6.86 The proposed works may lead to damage to the footways and carriageway directly adjacent to the site on Adeline Place. The proposal would also require removal of the existing vehicular access. Camden would need to undertake highway works following completion of the proposed works. This would allow the proposed scheme to be tied into the surrounding public highway. The highway works would include; Removal of the existing two vehicle crossovers; Retention of Smoke outlets along Adeline Place and repaving of the carriageway on Adeline Place with the retention of all current street furniture. A financial contribution for highway works should be secured as a section 106 planning obligation.
- 6.87 In terms of reinstatement of the footway on Adeline Place, the proposed ground floor plan shows the removal of the existing ramp crossover. Further details in this regard are typically discussed and agreed as part of Section 278 works following planning approval. Highways and streetworks contribution would be required by s106 legal agreement for the amount of £35,160.
- 6.88 This development would also have the potential to affect the West End Project activities which will be making alterations to all surrounding roads and we will wish to strictly control the movement of vehicles and timing of the development.

#### Crossrail

6.89 The London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (July 2010) set out the mechanism for contributions towards Crossrail. The SPG states that contributions should be sought in respect of proposals for uplifts in floorspace for office, retail and hotel uses in central London where there is a cumulative uplift in such floorspace of more than 500sqm. The Crossrail contribution estimated to be c.£397,000 would be secured via the s106 legal agreement.

# Sustainability

- 6.90 Policy DP22 and CPG3 require all changes of use over 500 sqm to submit a BREEAM preassessment with an expected target rating of 'Very Good' and obtaining 60% of the unweighted credits in the Energy category, 60% in the Water category and 40% in Materials. To meet BREEAM "Very Good" a points score of 55% must be achieved. The applicant's Pre-assessment analysis indicates the conversion can achieve a score of 55.67%. A post construction review should be secured via S106 to ensure that these targets are achieved in the final design.
- 6.91 The LDF (policy CS13) and CPG3 also require developments to contribute to the Borough's objective of meeting its 2050 target for achieving 80% reduction in CO2 emissions in order to help combat climate change. As part of this developments must consider renewable energy with Camden adopting the London Plan target for this purpose of 20% of energy requirements of any new development to be provided through on-site renewable sources. CPG3 requires that 20% of the total CO<sub>2</sub> reduction be achieved through the use of on-site renewable technologies.
- 6.92 The Bloomsbury Association has raised concerns about the level of reduction of carbon emissions from the development and the absence of soft landscaping in the scheme. The constraints of the site and the refurbishment nature of the proposals, as opposed to rebuild, limit the options for significant carbon reduction. However the submitted energy statement identifies 25% reduction on Part L2A 2013 compliance levels, mainly through the use of air source heat pumps. The proposed measures would be secured through the S106 energy efficiency and renewable energy plan indicating the approved BREEAM level (very good). There is limited scope for areas of soft planning within the curtilage of the site.
- 6.93 The applicant has also confirmed that the layout of the development plant room area would accommodate the necessary plant and equipment to interface with the future provision a district heating system. 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. This is welcomed and the district heating future-proofing of the site would be secured by s106 legal agreement.

# Water efficiency

- 6.94 DP23 encourages a range of measures to reduce water consumption and the risk of flooding. The applicant confirms that in order to have grey water collected separately would require two vacuum systems. Partitioning the tank, (with one system), is not an option due to the possibility of cross contamination. They state that the proposed jet-vac system is effectively a "waterless system".
- 6.95 A condition would be added to secure full details of the proposed water efficiency equipment to limit the internal water use and further investigation of the options for grey water recycling.
- 6.96 Overall the proposal is considered to comply with sustainability policies CS13, DP22, and DP23.

#### Contaminated land

6.97 The site is identified as have potential contamination. However as the proposals would involve internal fit-out and it is not considered necessary to require details of contamination.

# **CIL & planning obligations**

- 6.98 The proposal will be not be liable for Camden or the Mayor of London's CIL as no additional floorspace will be generated.
- 6.99 The proposal would result in additional employment opportunities for local residents. In keeping with the requirements of policy CS8, employment training strategy, apprenticeships, and local labour and procurement would be secured via legal agreement
- 6.100 In line with policy DP31 (Provision of, and improvements to, open space, and outdoor sport and recreation facilities), all developments that increase the demand for public open space facilities will be expected to make an appropriate contribution to meeting that additional demand. Schemes considered to increase the demand for public open space include developments of 500sqm or more of floorspace that are likely to increase the resident, worker or visitor populations of the borough. CPG6 indicates that hotels should make an open space contribution of 9sqm per single room and 18sqm per double room at a rate of £297 per single room and £593 per double room. This would be secured by a section 106 agreement.

## 7. CONCLUSION

- 7.1 The application is unusual and is the first 'POD' type hotel proposed within Camden. It is considered that the provision of hotel accommodation at the site is appropriate given its highly accessible and sustainable location and provides an opportunity to bring an underused car park back into beneficial use. Although the hotel would bring an intensification of use to the site it is considered that this can be achieved without undue impact on local residential amenity. Issues relating to neighbour amenity arising from hotel management, servicing, refuse and coach movements would be secured by the Hotel and Servicing Management Plans.
- 7.2 Planning Permission is recommended subject to conditions and a S106 Legal Agreement covering the following Heads of Terms:-
  - Car free development
  - Construction management plan
  - Hotel Management plan (include provisions to limiting stay to 3 nights; groups to be no more than 8; no coach drop-off)
  - Public open space contribution £14,226
  - Crossrail contribution £397,380 (payable to TfL)
  - Cycle hire docking station and public realm improvements contribution 150000
  - Feasibility study and safe guarding of cycle hire docking station in discussion with TfL, payment would go to public realm improvements if found not feasible.
  - Highways and streetworks contribution £35,160
  - Employment training strategy
  - Apprenticeship: 1 no. per £3m build cost plus £1,500 per apprentice
  - Local Procurement Code
  - Energy efficiency and renewable energy plan
  - Sustainability plan
  - Travel Plan
  - Travel plan monitoring fee of £6020

#### 8. RECOMMENDATION

8.1 Grant conditional planning permission subject to section 106 legal agreement.

#### 9. LEGAL COMMENTS

9.1 Members are referred to the note from the Legal Division at the start of the Agenda.

#### Conditions:

The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

The development hereby permitted shall be carried out in accordance with the following approved plans:

2897/L/01B, 2897/P/01B, 2897/P/02B, 2897/P/03B, 2897/P/04B, 2897/P/05B, 2897/P/06B, 2897/P/07, 2897/P/08A, 2897/P/11F, 2897/P/12C, 2897/P/13C, 2897/P/14D, 2897/P/15G, 2897/P/16G, 2897/P/17D, 2897/P/18C, 2897/P/19B, 2897/P/31, 2897/P/32, DMWR/A3/3233/PL-00300revP1, H2047 Noise Impact Assessment v9 by Hawkins, Draft Hotel Management Plan v3 by Criterion Capital, D Draft Construction Management Plan by SISK, Drainage Strategy v2 by Pinnacle, Basement Impact Assessment v2 by Pinnacle, 30480/D1F Transport Statement by TPP, Planning Statement by Bilfinger GVA, C Design & Access Statement by Proun, By Hoare Lee; REP-1005840-CAR-15060 Air Quality Assessment, Air Quality Planning Checklist, REP-14401010-11A-JN-20150505 B Energy Strategy, 651\_376 BREAMM Pre-assessment dated September 2015, 1010-ICC-080515-11-01 Summary of MEP System and BRUKL Output Document, email from Ben Edwards dated 24/11/15.

Reason: For the avoidance of doubt and in the interest of proper planning.

Prior to first occupation of the development an Air Quality Report shall be submitted to and approved in writing by the local planning authority. The report shall provide evidence that an appropriate NO2 scrubbing system on the mechanical ventilation intake has been installed. The report shall also provide a detailed maintenance plan for the system, as outlined in the Air Quality Statement hereby approved (Hoare Lea, 22.5.15).

The scrubbing system shall thereafter be operated and maintained in accordance with the details thus approved. The hotel shall not be occupied by guests except when the scrubbing system is in operation in accordance with the approved report.

Reason: To safeguard the amenities of the visitors and staff of the premises in accordance with the requirements CS16 (Improving Camden's health and wellbeing) of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 (Amenity of occupiers and neighbours) and DP32 (Air quality and Camden's Clear Zone) of Camden Local Development Framework Development Policies.

The deliveries and all collections (including waste) for the use hereby permitted shall not be carried out outside the hours of 0900 to 2100hrs every day including Sundays and bank holidays

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

- Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:
  - A) Manufacturer's specification and details of all facing materials including colour and samples of those materials.
  - B) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the new hotel entrance at a scale of 1:10;
  - C) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors;

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

Before the development commences, details requiring the provision of a minimum of 8 covered, secure and fully enclosed cycle storage/parking spaces for staff and 24 cycle parking spaces for visitors. The cycle parking facilities should be designed to Camden Council's design specifications as detailed in CPG7 and the ongoing retention of this facility, details of which will need to be submitted and approved, and approval should be reserved by condition.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

No impact piling until a piling method statement, prepared in consultation with Thames Water or the relevant statutory undertaker, detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works, has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To ensure the development does not cause harm to the local water infrastructure in accordance with policy DP27 of the London Borough of Camden LDF Development Policies.

Prior to occupation of the development the refuse and recycling storage facilities intended for its occupiers as shown on the drawings and email dated 23/11/15 hereby approved shall be provided in their entirety. All refuse and recycling storage facilities shall be permanently maintained and retained thereafter.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS18 of the London Borough of Camden LDF Core Strategy and DP26 of the London Borough of Camden LDF Development Policies.

Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

Prior to commencement of the development, full details of the plant equipment and mitigation measures as set out in acoustic report hereby approved (ref: H2047/V09 06/11/2015) and providing confirmation that the cumulative external noise levels emitted from all plant/machinery/ equipment working in tandem (with the exception of the emergency generators) at maximum capacity have met the noise criteria in the approved acoustic report, shall be submitted to and approved in writing by the local planning authority. The details as approved shall be implemented prior to first operational use of the plant or occupation of the development and shall thereafter be permanently retained and maintained in accordance with the manufacturers' recommendations, and as necessary a post installation noise assessment shall be carried out to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken shall be submitted to and approved in writing by the local planning authority.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

Prior to use of the development, details shall be submitted to and approved in writing by the Council to confirm that noise emitted by standby or emergency generators during power outages or testing does not exceed the lowest daytime LAeq(15min) as measured or calculated according to BS4142:2014.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

Development shall not commence until a drainage strategy, prepared in consultation with the sewerage undertaker, which clearly indicates that the existing and proposed foul and surface water connection points and peak flow rates will have an acceptable impact on the public sewer system, has been and submitted to and approved by the local planning authority in writing. First occupation of the development shall not commence until the drainage works referred to in the strategy have been completed.

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community in accordance with the requirements of policies CS5 and CS13 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 and DP23 of the London Borough of Camden Local Development Framework Development Policies.

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall not be used other than a hotel as a single planning unit and for the purposes of short-term, temporary accommodation only.

Reason: To ensure that the future occupation of the building does not adversely affect the adjoining premises/immediate area by reason of noise, traffic congestion and excessive onstreet parking pressure in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

Prior to the installation of any electrical plant equipment on levels -4th or -5th basements, details of the installation, prepared in consultation with Transport for London, shall be submitted to and approved in writing by the local planning authority.

Any plant equipment installed thereafter shall be operated and maintained in accordance with the details thus approved.

Reason: To ensure that basement plant equipment does not harm the public transport infrastructure in the underground tunnels beneath the development site, in accordance with policy CS11of the London Borough of Camden Local Development Framework Core Strategy and policy DP27 of the London Borough of Camden Local Development Framework Development Policies.

## Informatives:

- 1 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar)and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- You are advised that the Transport Strategy Team should be consulted regarding the construction of the crossover on the public highway and any other work to, under, or over, the public highway, including vaults and thresholds. tel: 020-7974 5543 for further advice and information.
- 3 In good time, prior to the start of construction (or if appropriate, demolition) on site, the contractor shall discuss and agree with the Council's Engineering Service Network Management team (tel: 020-7974 2410) detailed arrangements for the transportation of goods and materials to and from the site. The Council will prosecute those responsible for

- any breaches of the provisions of the Highways and Litter Acts which occur as a result of construction on the site.
- 4 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
- You are reminded that filled refuse sacks shall not be deposited on the public footpath, or forecourt area until within half an hour of usual collection times. For further information please contact the Council's Environment Services (Rubbish Collection) on 020 7974 6914/5. or on the website http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-street-environment-services.en.
- This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk).
- Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
- The Council supports schemes for the recycling of bottles and cans and encourages all hotels, restaurants, wine bars and public houses to do so as well. Further information can be obtained by telephoning the Council's Environment Services (Recycling) on 0207 974 6914/5 or on the website http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en.
- 9 You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 020 7974 6914/5 or see the website http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en.
- 10 Your attention is drawn to the need for compliance with the requirements of the Environmental Health regulations, Compliance and Enforcement team, [Regulatory Services] Camden Town Hall, Argyle Street, WC1H 8EQ, (tel: 020 7974 4444) particularly in respect of arrangements for ventilation and the extraction of cooking fumes and smells.
- 11 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Argyle 020 WC1H 8EQ (Tel. No. 7974 4444 on or http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-theenvironmental-health-team.en or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.



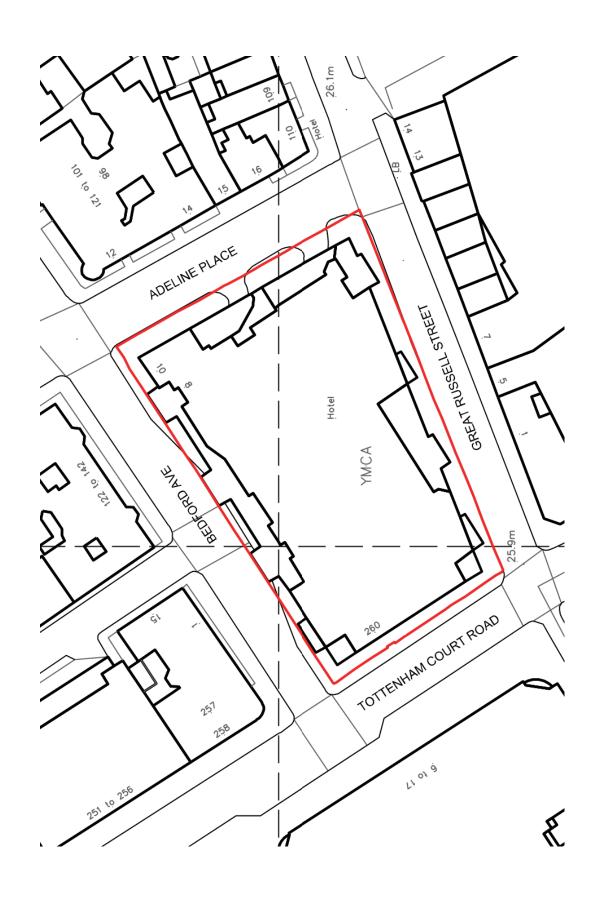
Application No: 2015/3605/P
112A Great Russell Street
London
WC1B 3NP

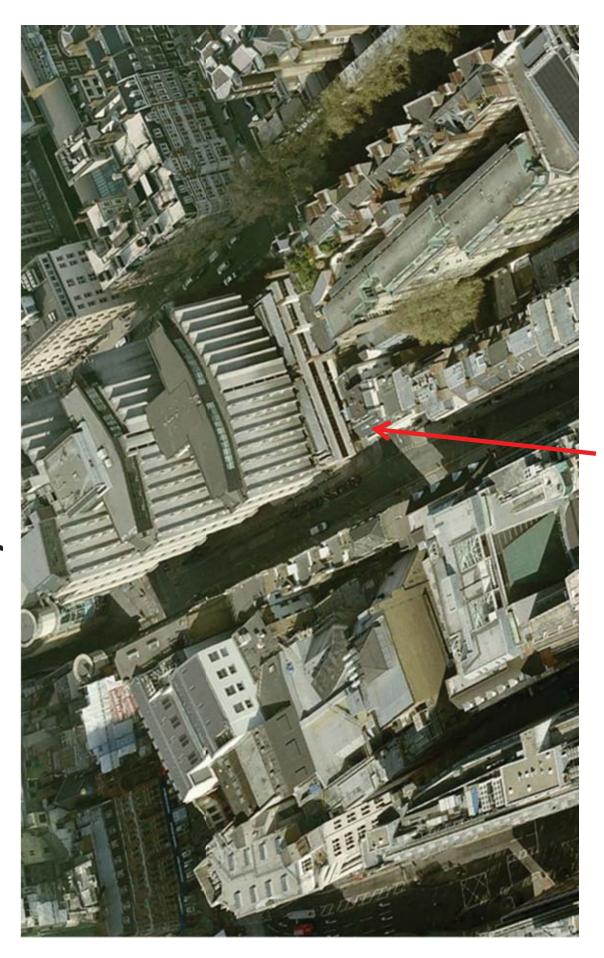
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# 2015/3605/P

112A Great Russell Street

# Location Plan





**Great Russell Street** 



View facing down Adeline Place, Bedford Court Mansions to the right

PART



View of down Bedford Avenue with Bedford Court mansions to the right

Existing Car park entrance and ramp on Adeline Place

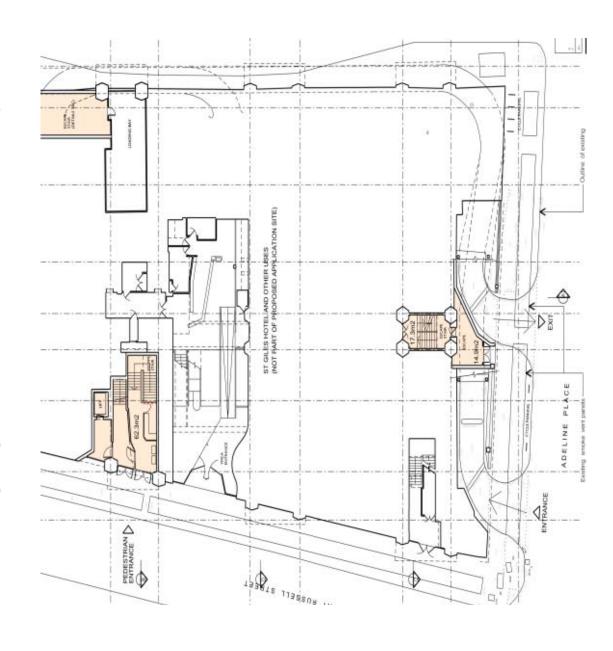


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Photograph of car park



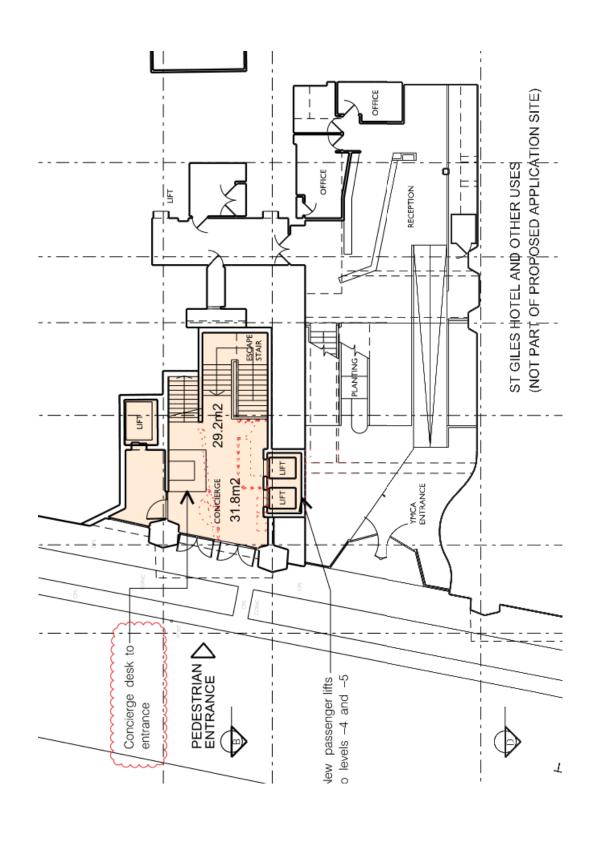
## Existing ground floor plan



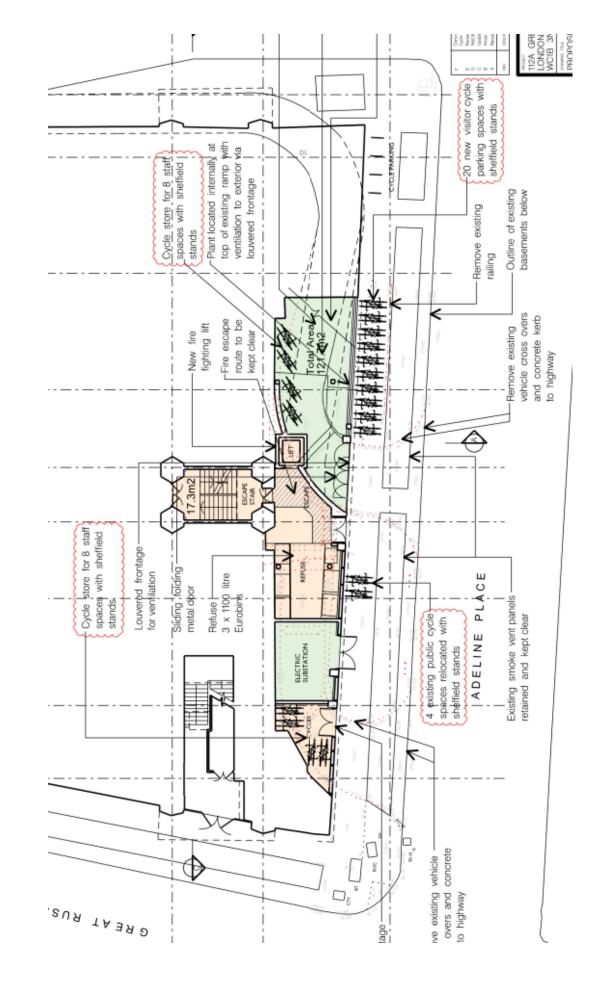
Proposed ground floor plan



# Proposed entrance area (Gt Russell St)



# Proposed Adeline Place plan

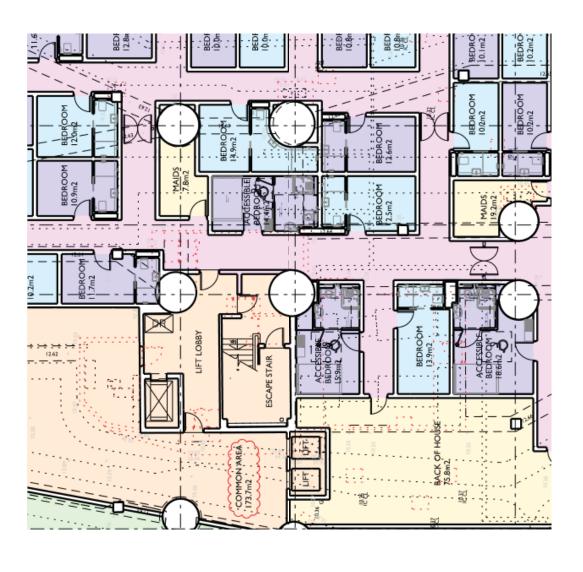


## Existing -1 floor plan

### Proposed -1 floor plan ST GILES HOTE (NOT PART OF PROPOSED APPLICATION SITE) YMCA AND ST GILES HOTEL (NOT PART OF PROPOSED APPLICATION SITE)

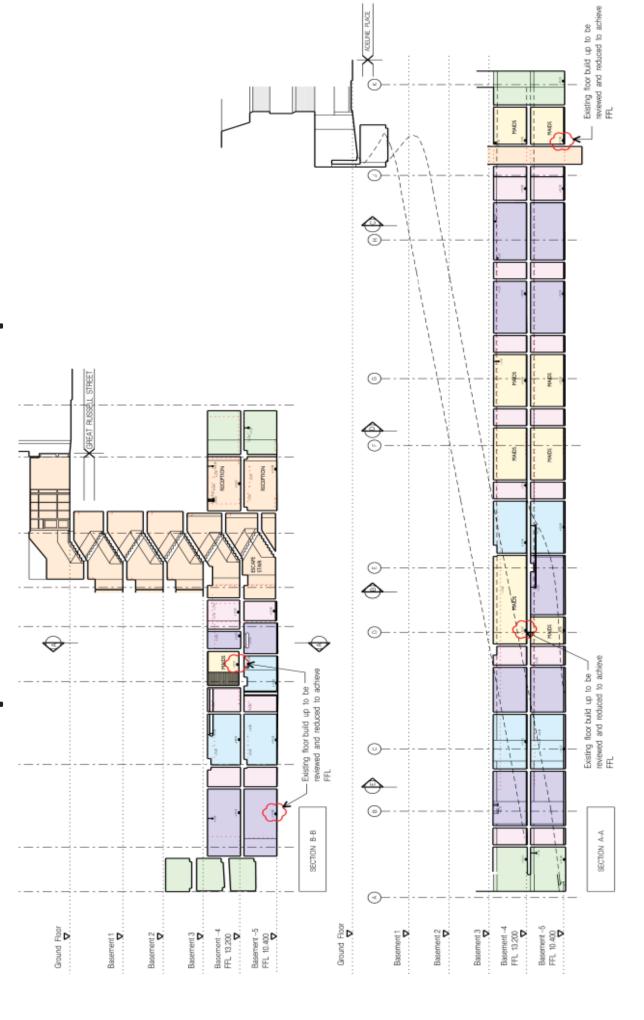
#### Proposed -4 Floor plan • 0 GREAT RUSSELL STREET

## Extract from level -4

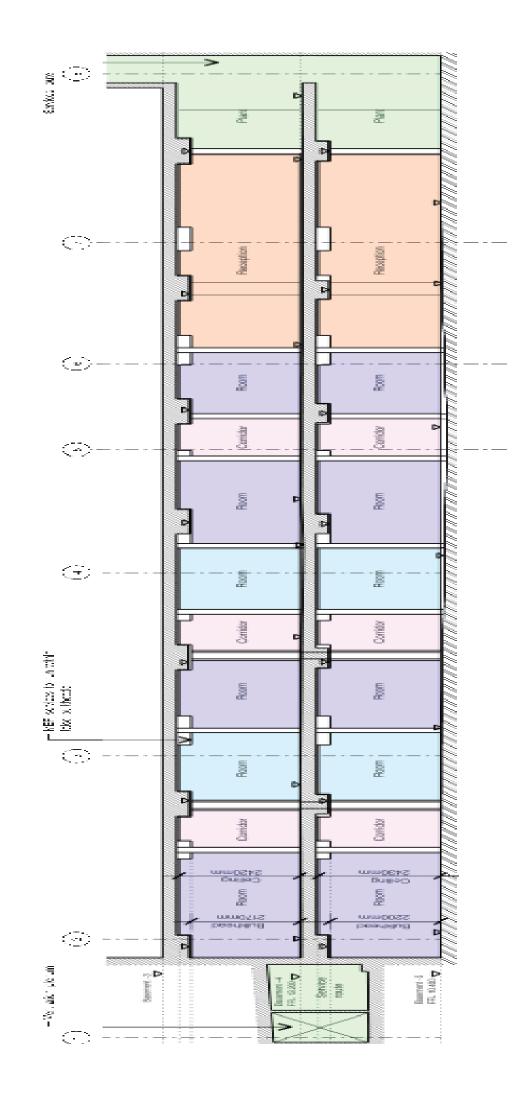


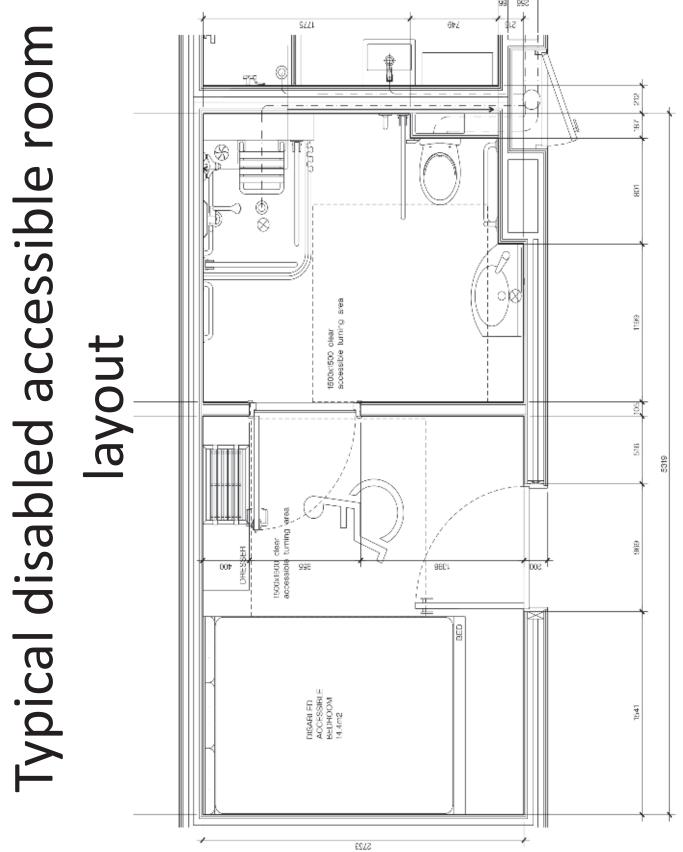
### Proposed -5 Floor plan • Φ

## Proposed section plans

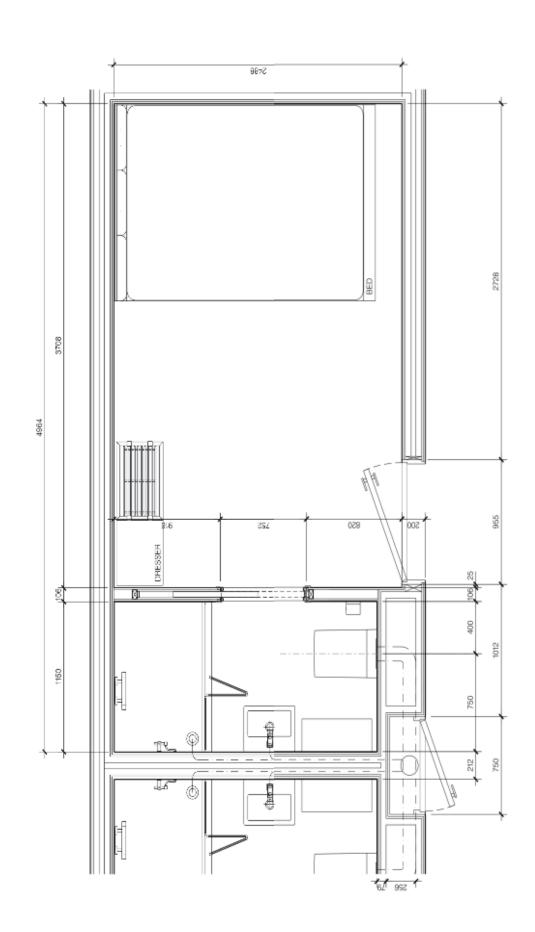


## Proposed section showing ceiling heights and bulkheads for MEP services



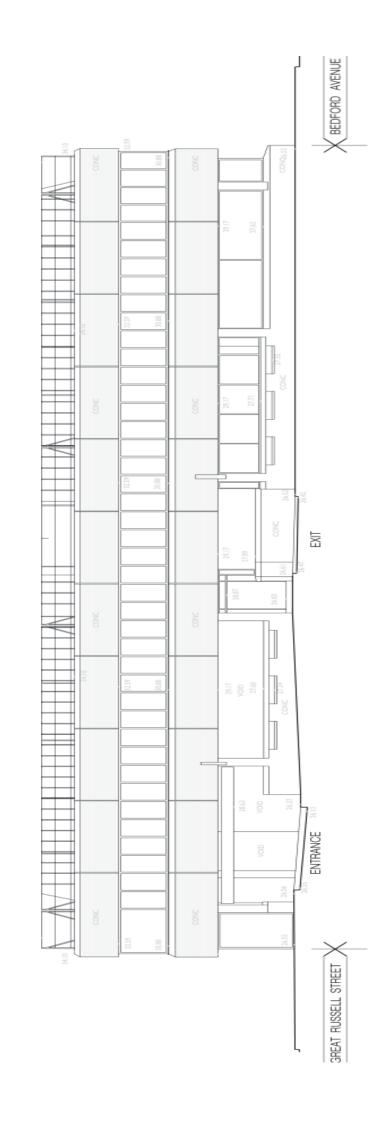


# Typical standard room layout

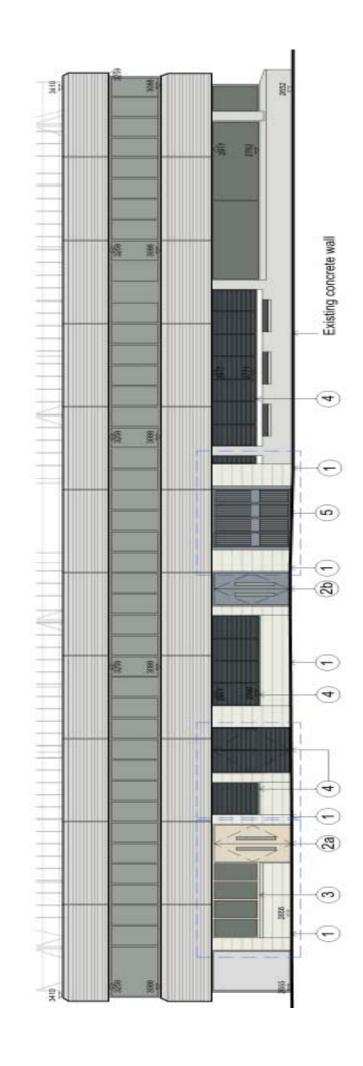


#### HIGH LEWEL ABOVE CYCLE RACKS Ground floor ventilation ductwork LEVEL -4 INTAKE DUCTWORK INSE FROM IRLOW ROUTED ALONG RAMP CHANTHOOM AT 10 ML -4 HELDW 格拉林拉拉拉拉拉拉 LEVEL -5 DESCHARGE DUCTNORN RESE 133 S 77 S S N W I Y 3 W D Т

### Existing elevation Adeline Place



## Proposed elevation Adeline Place



## Proposed montage -Great Russell Street

