



**106 GREAT RUSSELL STREET**  
LONDON WC1B 3NB

PROPOSED BASEMENT EXTENSION TO THE REAR OF THE EXISTING BUILDING, INCLUDING ALTERATION TO EXISTING BASEMENT LEVEL AND NEW STAIR FROM GROUND FLOOR TO BASEMENT

Application for planning permission 2015/6422/P  
Application for listed building consent 2016/0354/L

29 August 2016

The Bloomsbury Association has reviewed the revised information uploaded to the Council's website on 18 August 2016 and maintains its objection to the application. Whilst some effort has been made to suggest mitigation of the impact of the proposed development on the existing mature Plane tree, we are skeptical of its adequacy and of its practicality.

The architectural expression of the proposed rear extension, in its revised form, is materially unchanged since our last comments and is much less convincing than the original proposal. Though originally conceived as an isolated garden 'pavilion', in the revised proposal the aesthetic rationality of that has gone. In consequence, we have very real concerns as to whether the proposal can be considered either high quality or inclusive, within the meaning of NPPF (paras 61, 63 and 64), and whether it meets the design quality and heritage criteria of LDF DP24 and 25.

The comments the Association made on the application in its letters dated 30 March and 24 July 2016, together with the letter from RGS Arboricultural Consultants dated 20 July 2016, still stand. A summary of the reasons for our objection follows. This should be read in conjunction with our previous letters.

### **Summary**

These applications have highlighted three major issues: design quality, the impact of the proposal on the existing mature Plane tree in the rear garden of 106 Great Russell Street and the impact on the listed building. All are related, all contribute to the quality of the Bloomsbury Conservation Area and cannot, as the applicant has endeavored to do in the planning strategy that has emerged over the past five years, be addressed separately or incrementally and only in response to comments made during consultation.

These issues are reflected in Government policy. The National Planning Policy Framework, March 2012, sets out the Government's planning policies for England and how these are to be applied. They include design quality and conserving and enhancing the historic and natural environments and are the basis of our objection, the principal points of which are:

- The proposed rear extension does not reflect the high standard of design the Council aspires to in the planning applications it determines. Policy D1 states: "*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*"
- The proposal affects the character and appearance of the listed building and its historic setting. It damages the building's visual, spatial and historic integrity and detracts from the Bloomsbury Conservation Area. It does not conserve and enhance the historic environment. Policy DP25 states that the Council will "*only permit development within conservation areas that*

*preserves and enhances the character and appearance of the area" and will "not permit development that it considers would cause harm to the setting of a listed building".*

- The Design & Access and Heritage Statements have made reference to the poor condition of the fabric of the listed building yet the application seems to include no proposals for the repair and refurbishment of the existing building above basement level.
- No details are given of the proposal to install new timber framed, double-glazed windows in the facade of the listed building.
- Potential adverse impacts on the existing mature Plane tree in the rear garden that is safeguarded by a TPO. It is claimed that the structure of the extension will be a lightweight timber frame and there will be no excavations for substructure yet there are conflicting statements in the application documents about this and no accompanying structural statement or indicative foundation design to verify it. This is not credible. It is equally doubtful that the extent of intervention into the existing building will not require underpinning of the existing foundations and excavation for new drainage works. There is no accompanying indicative drainage design to indicate how drainage indicated on the drawings will be achieved.
- The arboricultural impact assessment does not satisfactorily demonstrate the extent of the works or that they can be undertaken without risk to the tree or that any risks can be mitigated. It has not been revised to reflect current proposals nor does any arboricultural method statement accompany the application.
- Impacts on the natural environment and on biodiversity, both during the construction stage and on completion are not considered.
- Light pollution.
- Retention and inappropriate relocation of a substantial amount of existing air-conditioning equipment that is understood to have been originally installed without planning permission or listed building consent. No noise impact assessment accompanies the retrospective application.
- No provision is made for waste storage, contrary to LDF Policy DP26.
- No Access Statement accompanies the application.
- No demolition management plan and no construction management plan accompanies the application to demonstrate how the works are to be carried out within a very confined area without damaging the existing tree, damaging the fabric of the existing building and having an adverse impact on residential neighbours.

For all these reasons we urge the Council not approve the application. This is a compromised design proposal that risks a lot to potentially achieve very little benefit. It does not meet the Council's expectation for excellence in architecture and design.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath  
**On behalf of the Bloomsbury Association**

*Copies to:*

Councillor Adam Harrison, London Borough of Camden  
Catherine Bond, Conservation and Historic Buildings Advisor, London Borough of Camden  
Nick Bell, Trees and Landscape Officer, London Borough of Camden  
Laura Hazelton, London Borough of Camden  
Hugh Cullum, Bloomsbury Conservation Area Advisory Committee  
Dr Kathleen Paul, Director, Florida State University Study Centre  
Chair, Bedford Court Mansions Limited  
Robert Yates, RGS Arboricultural Consultants  
Chair, Bloomsbury Association