



112A GREAT RUSSELL STREET
LONDON WC1B 3NP

PROPOSAL: Details of cycle storage (Condition 6) of planning permission 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016 for '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'.

Application for planning permission reference: 2019/0226/P

18 April 2019

The Bloomsbury Association objects to this application and wishes to make the following additional comments on revised details proposed for cycle storage (Condition 6). These should be read together with those submitted on the Association's behalf by Roger Wilson on 9 February 2019.

1. Condition 6 states: *"Before the development commences, details for 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 shall be submitted to and approved in writing by the local planning authority. The cycle parking facilities should be designed to Camden Council's design specifications as detailed in CPG7. The cycle parking facilities shall be provided as approved prior to the occupation of the development and shall thereafter be permanently retained as such."*
2. Drawing number 2897/P/11 revision F, Proposed Ground Floor Plan, by PROUN Architects is one of the approved plans referred to by the Inspector in his decision. It has been revised to discharge this condition and resubmitted under the name Criterion Capital with the same drawing number. It is misleading for it to have the same drawing number and revision, as it is not the approved plan.
3. The revised Criterion Capital plan has been annotated to indicate cycle storage for 2 staff spaces with Sheffield stands and 6 staff spaces with Josta two-tier racks. There appears to be insufficient space or headroom to accommodate the Josta two-tier racks shown to accord with the standards given in CPG7 Annex 1 and the manufacturer's layout and space requirements; nor does the minimum clear access space required in front of the racks appear to be provided. The space allocated for staff parking seems too small to accommodate the number of cycles proposed.
4. Drawing number 1441010-HL-XX-GF-GA-M-570-7000 revision P5, Ground Floor Ventilation Ductwork, is included with the Overview of Proposed Mechanical and Electrical Systems by Hoare Lee and was referred to by the Inspector in reaching his decision. The Josta two-tier racks appear to be obstructing the proposed air intake to hotel ventilation plant. An existing louvre, proposed to be retained and understood to serve the adjacent restaurant/bar use, is also obstructed.
5. The revised Criterion Capital plan has also been annotated to indicate 24 visitor cycle parking spaces with Sheffield stands on the former car park exit ramp. This is not in accordance with the approved Hotel Framework Travel Plan, para 5.13. Nor is it in accordance with the approved Hotel Management Plan, para 9.1, which proposes that the hotel will be serviced using an off-

street service access ramp off Adeline Place with all deliveries offloaded and then loaded onto a small electric vehicle, which will remain in the ramp service area. The vehicle will then transport goods from the ground floor service entrance before depositing them in a designated service area at Level -4. This no longer seems feasible if access to one ramp is closed by the location of an electricity substation and the other by a firefighting lift and cycle parking. The applicant needs to be in accordance with the details submitted to satisfy their planning obligations under the Unilateral Undertaking and these should not conflict with the proposal granted planning permission by the Inspector at Appeal. Therefore the requirement of Condition 6 cannot be met as shown and therefore the condition cannot be discharged.

6. It is unclear from the Criterion Capital drawing at what level the 10 cycle parking spaces proposed on the Bedford Avenue side of the building are located - at street level or on the ramp at basement level.

If it is assumed they are all on the ramp at basement level, the arrangement of the Sheffield stands does not accord with the parking standards given in CPG7 Annex 1 and Annex B: Cycle Parking Design Details on the Planning Portal. It is arguable whether such a location is "conveniently located" and sufficiently "easy to use" to meet the required parking standards. Stands as shown also appear to be of insufficient length and are not spaced sufficiently far from the ramp wall to be usable. To amend this would reduce the clear, unobstructed width of the ramp further to the extent that it may constrain access to the stands. The applicant should be requested to demonstrate that the proposal is capable of being implemented to acceptable standards.

If the stands are intended to be on the pavement of Bedford Avenue at street level they would obstruct the free flow of pedestrians on the public highway.

7. Drawing number 1441010-HL-XX-GF-GA-M-570-7000 revision P5, Ground Floor Ventilation Ductwork, shows intake and discharge ducting routed along the same section of ramp together with eight condensing units. It is unclear how the ramp will accommodate both cycle parking and ducts, allowing sufficient space for service access and maintenance. It is also uncertain whether the environment in close proximity to condenser units will be appropriate for visitors using the cycle parking provided.
8. The revised Criterion Capital plan shows a dedicated loading bay (5x2 m) for the hotel on the Adeline Place frontage. This is a variation to the proposal granted by the Inspector on Appeal that has not been agreed either as part of the Hotel Framework Travel Plan, the Hotel Management Plan or Servicing Management Plan. The Council is required to consult publicly on any changes proposed to current parking arrangements on the public highway.
9. The plan also shows the swept path of a vehicle entering the building via the former car park exit ramp. This is a further variation to the proposal granted by the Inspector on Appeal that did not include for any on-site parking. Indeed, as shown on the approved drawings, existing vehicle cross-overs are to be removed from Adeline Place.
10. As we have commented previously, the Bloomsbury Association is concerned that there remain a number of fundamental issues relating to this and other submissions.

At the time of the application and subsequent Appeal, the Association expressed concern that a design solution had been proposed that was unsound and could not be implemented. Cycle storage and access to refuse storage and the electricity substation were mentioned as being of particular concern with regard to compliance with legal standards. That still remains the case. The Inspector, while mindful of these concerns, eventually decided that they could be adequately controlled by conditions or the Unilateral Undertaking. What is now evident in recent submissions is a product of a design solution that cannot be implemented. It underlines the grounds on which the Council refused the original application prior to its appeal and runs in the face of issues raised at the appeal on which the Inspector's decision hinged.

11. How the ventilation system and other components of the life support system fit in at street level with cycle parking and all the other essentials of servicing on a tight, complex site with land ownership issues is a complication that does not seem to have been grasped. The technical submissions required from the conditional approval or from the s106 Unilateral Undertaking are

all inter-related and should be considered holistically by a coordinated design team, prior to planning decisions being made and construction commencing, in order for interested parties to properly consider and comment on what has been submitted. Proposals to discharge conditions 5 and 6 also need to be consistent with each other and with the design proposal that has been granted planning permission.

It is the Association's view that changes to the design have been proposed that go beyond what is required by, or consistent with the condition, i.e. they show some details for a design solution that differs significantly and materially from what was approved. This departure from the scheme granted planning permission requires a complete reappraisal of the methodology and content of the submissions and a new planning application. To consider incremental approval of variations through condition discharge or through submissions under the Unilateral Undertaking at this stage, when the design solution appears unresolved, would be an unsound and unenforceable basis upon which to proceed. This submission is fundamentally flawed and should be rejected.

We would be grateful if you would let us know of any further modification to the application and the decision, if it is to be determined under delegated powers.

Bloomsbury Association

Copies to:

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