



**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

3 June 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). This should be read together with the comments made in our letter dated 18 April 2019 and those submitted on the Association's behalf by Roger Wilson on 9 February 2019. The commentary on the Servicing Management Plan sent to the Planning Obligations Team on the Association's behalf by Roger Wilson on 15 May 2019 is also material.

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."*

A Construction Community Working Group meeting was held on 24 April 2019 attended by representatives from the applicant, contractor, local businesses and residents. The contractor stated that the project is now formally being implemented, which is in breach of this condition's requirement for details be submitted and approved prior to development commencing.

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 was revised and submitted under the same drawing number in support of this application. It appears to have been withdrawn and substituted by drawing 2897/P/11 revision G, which has been further revised to discharge this condition and resubmitted under the name Criterion Capital.

With reference to this drawing, we wish to elaborate further on items 5 and 6 of our comments on this application in our letter dated 18 April 2019.

3. The revised Criterion Capital plan has been annotated to indicate visitor cycle parking spaces with Sheffield stands on the former car park exit ramp. This differs from what was shown on the approved drawings and from what was originally submitted to discharge this condition. It is not in accordance with the Hotel Framework Travel Plan, para 5.13. Nor is it in accordance with the Hotel Management Plan, para 9.1, nor the revised Servicing Management Plan, all of which propose that the hotel will be serviced from Adeline Place using an off-street service access ramp with all deliveries offloaded and then loaded onto a small electric vehicle that will remain in the ramp service area. The vehicle will then transport goods down the ramp from the ground floor service entrance before depositing them in a designated service area at Level -4.

Placing cycle parking on the ramp renders this unachievable. It appears no longer feasible for any vehicle to operate on the service access ramp, which is blocked by a fire-fighting lift enclosure, ventilation plant, ventilation ductwork and this cycle parking proposal. All cannot function within the same space. We note that ventilation plant and ductwork, essential for the safe occupation of below ground accommodation and much discussed at the Appeal, has been entirely omitted from the drawing with no suggestion for where it will be relocated.

4. CPG7 has now been superseded by *Camden Planning Guidance: Transport*. The proposal fails to meet Sections 8.19, 8.20, 8.21 and 8.40 of the Guidance. The layout of the Sheffield stands does not accord with the dimensional criteria given in the guidance and, where Camden's CPG is lacking, GLA guidance for situations where a row of stands is next to a physical obstruction, such as a wall or a vehicular path.
5. The proposed ground floor plan shows a clear zone approximately 1.2m wide between the servicing (south) side of the ramp and cycle parking. Between the inner cycle stand and the (north) side of the ramp is a dimension of 0.75m. Both fail to meet the dimensional criteria for access given in Section 8.40 of the CPG and GLA guidance.
6. If the space standards for cycle bays given in CPG and GLA guidance are adhered to and the inner Sheffield stands positioned correctly relative to the ramp wall to allow all to be usable, the clear dimension between the other side of the ramp and cycle parking will reduce to less than 1m. This is insufficient space to safely accommodate any servicing vehicle while also allowing visitors convenient and safe access to park cycles.
7. The applicant should be required to demonstrate that the proposal is capable of being implemented to acceptable standards because, as proposed, cycle parking on the ramp will prevent it also being used for servicing or for ventilation ductwork or plant. This degree of functionality is fundamental to the proposal and without it the condition cannot be discharged.
8. The Plan needs to be achievable and consistent with details submitted to satisfy other conditions under the planning permission and other obligations under the Unilateral Undertaking. These should not conflict with the proposal granted planning permission by the Inspector at Appeal. Since the Plan measures cannot be met as shown, the condition cannot be discharged.

The Association maintains their 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 yet is being built, would be an unsound and unenforceable basis upon which to proceed. Conditions and obligations cannot be dealt with in isolation with uncoordinated design solutions. 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:*

Councillor Adam Harrison, London Borough of Camden  
Councillor Sue Vincent, London Borough of Camden  
Councillor Danny Beales, London Borough of Camden  
Neil McDonald, London Borough of Camden  
Ben Farrant, London Borough of Camden  
James Renwick, London Borough of Camden  
Shahida Sanessie, London Borough of Camden

Gary Bakall, London Borough of Camden  
John Sheehy, London Borough of Camden  
Raymond Yeung, London Borough of Camden

Chair, Bedford Court Mansions Limited  
Steward, Bedford Estates  
Charles Lawrence, Ashby Capital  
Thomas Prévot, École Jeannine Manuel  
Abigail Tan-Giroud, St Giles Hotel  
Steve Johnson, St Giles Hotel  
Roger Wilson  
Chair, Bloomsbury Association