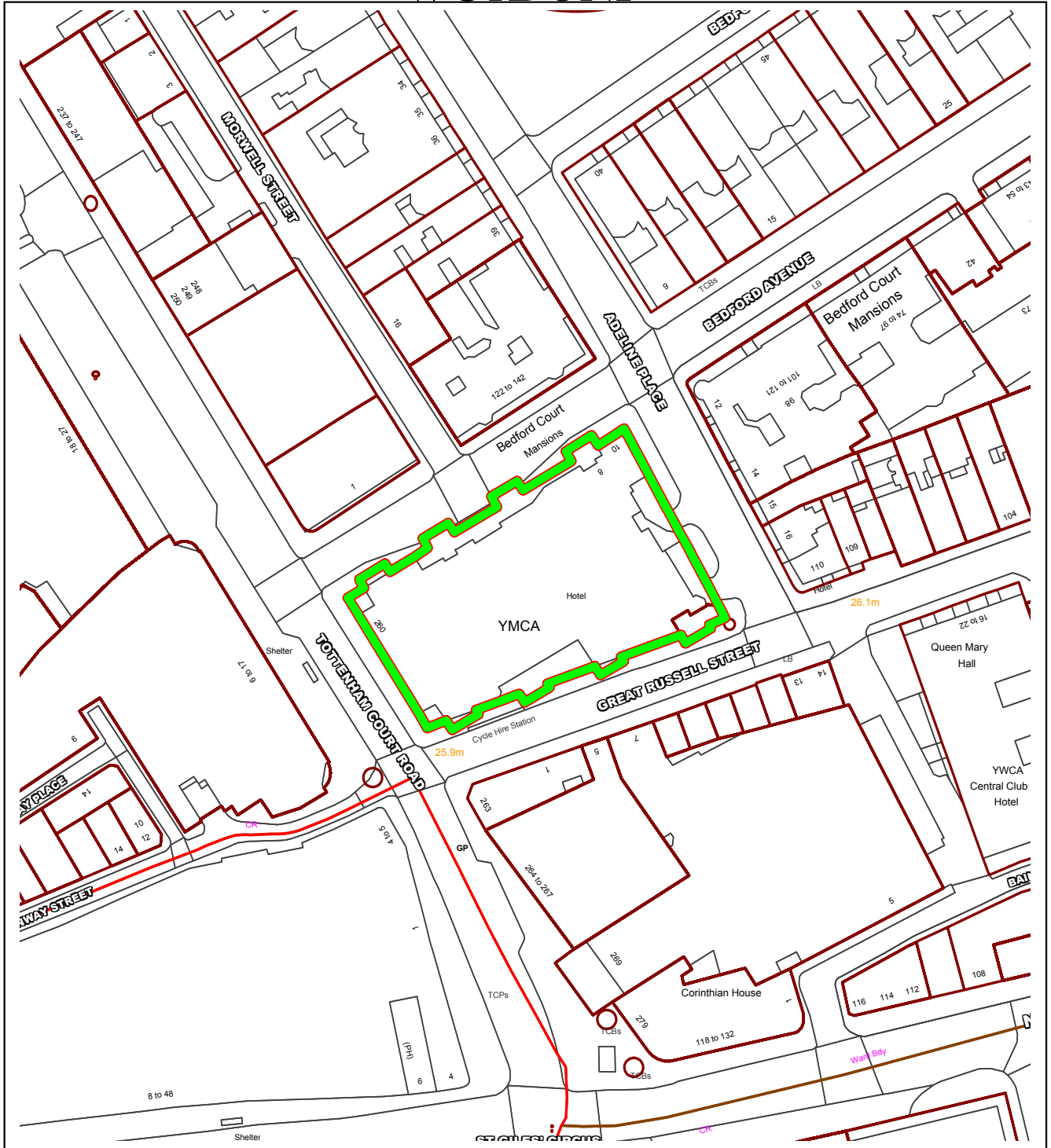


2019/1118/P – 112A Great Russell Street, WC1B 3NP



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2019/1118/P – 112A Great Russell Street, WC1B 3NP



1) Birds eye view of Great Russell Street and Adeline Place Elevations (vehicular entrance on to Adeline Place).



2) Entrance on Great Russell Street



3) Vehicular access points on Adeline Place

Delegated Report		Analysis sheet		Expiry Date:		24/04/2019	
(Members Briefing)		N/A		Consultation Expiry Date:		N/A	
Officer				Application Number(s)			
Ben Farrant				2019/1118/P			
Application Address				Drawing Numbers			
112A Great Russell Street London WC1B 3NP				Please refer to draft decision notice			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
Details of drainage strategy (Condition 10) 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'.							
Recommendation(s):		Grant consent					
Application Type:		Details of condition					

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice			
Informatives:				
Consultations				
Adjoining Occupiers:	No. of responses	0	No. of objections	0
Summary of consultation responses:	<p>As the application is for the approval of details on a previous planning consent, no statutory third party consultation is required.</p> <p>No third party comments were received.</p>			
Bloomsbury Association	<p>The Bloomsbury Association objects to the scheme on a number of grounds, summarised below. Given the number and complexity of the concerns, each has been addressed with the Officer's response in italics directly below each point.</p> <p>1) The condition is derived from a representation made by Thames Water on 02/10/2015 concerning 2015/3605/P which outlined certain requirements. The proposed drainage strategy does not meet these requirements (such as the submission of on and off-site drainage works). As this was not included within the decision notice in its entirety, Thames Water require liaison with the local planning authority 'prior to planning application approval'. It is unclear whether this has taken place. There are further areas (such as fat traps, petrol/oil interceptors, groundwater, refuse storage, air-conditioning condensate and basement infiltration) that the strategy does not address or discount.</p> <p><i>Officer's Response: The proposal would utilise the existing surface water drainage system and given that the site does not consist of any external areas, surface water would be very minimal. As such the drainage strategy addresses exclusively foul water and confirms that the existing main runs and sewer connections would be utilised, with enhanced pumping infrastructure, and the introduction of back-up and warning systems in the event of a pump failure. It confirms that the discharge rate would be limited to 8l/s which is within Thames Water's maximum allowance of 11l/s for this development, as confirmed in writing, in its letter dated 20/08/2018 accompanying the application. The remaining requirements referred to are either not applicable to this development (i.e. fat traps and petrol oil interceptors), or fall outside of the scope of this condition (i.e. groundwater, refuse storage, and basement infiltration). The submitted strategy already addresses air-conditioning condensate. The Council's Structures Manager has reviewed all the information, and confirmed acceptability of the drainage strategy.</i></p> <p>2) The strategy does not adequately assess the impact on the sewerage system. Nor does it assess potential conflict with the YMCA Central Club (and associated swimming pool) or the St Giles Hotel.</p>			

Officer's Response: See response to question 1. The site's drainage system is entirely independent of those for the YMCA Central Club, its swimming pool and the St Giles Hotel, and would have no impact on their operation.

- 3) The statement includes an 'ambition' for waste water rather than a feasible design. Information and plans have not been submitted to back this.

Officer's Response: See response to question 1. The condition does not specify that drawings are required, and would not be necessary in this instance, particularly given that the strategy proposes to utilise the existing main runs and connections.

- 4) Lack of information regarding how the sewer connection on Adeline Place will be made from underground sewage pumping stations. Existing vents and services may constrain any connection. This land is also outside of the ownership of the applicant – access may not be allowed.

Officer's Response: The applicant has confirmed that the existing main runs and sewer connections would be utilised. No new connections are required. In any event ownership/access concerns are a civil rather than planning matter.

- 5) Works commenced on 15/10/2018 (according to the submitted CMP) prior to the approval of this condition; this is contrary to the terms of this condition. The application form states (incorrectly) that works have not commenced.

Officer's Response: The enforcement team has been closely monitoring this site, and whilst preliminary works have been undertaken, this does not equate to the 'commencement of development'. In any event, this has no material impact on the drainage strategy provided or the information it contains.

- 6) The applicant claims advice has been sought from the Council prior to the submission of this conditions application. This is misleading as any advice would have been on 10/03/2015, and would not be specific to this application.

Officer's Response: Whilst it is acknowledged that specific pre-application advice was not sought in relation to this application, this has no material impact on the drainage strategy provided or the information it contains.

- 7) The application is not accompanied by any detailed drawings to describe how the strategy will work, to identify pipe runs existing and proposed, proposed connection points and to indicate where the proposed sewage pumping stations will be located.

Officer's Response: The condition does not specify that drawings are required, and they would not be essential in this instance, particularly given that the strategy proposes to utilise the existing main runs and connections. The Council's Structures Manager has reviewed all the information, and confirmed acceptability of the drainage strategy.

- 8) A supporting document (letter from Thames Water dated 20/08/2018) states the proposed development is for a 225 room hotel; materially different from the approved 166 rooms. The conclusions reached could be in doubt given the difference.

Officer's Response: It is noted that the number of rooms cited is an error. However, the submitted drainage strategy confirms that the discharge rate would be limited to 8l/s which is within Thames Water's maximum allowance of 11l/s for this development.

- 9) The proposed as submitted is unsound. It has inconsistencies; it omits consideration of elements fundamental to the operation of an underground hotel and to the continuity of operation of other uses on the site, and may be incapable of implementation.

Officer's Response: The concerns raised have been addressed within the drainage strategy submitted, as confirmed by the Council's Structures Manager.

- 10) The Inspector included condition 10 to 'manage the risks of pollution' (para. 43). The drainage strategy does not adequately address this.

Officer's Response: The information submitted to date is considered to sufficiently address risks of pollution.

Site Description

The site is occupied by a large detached 20th 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.

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 (the subject of this application). 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.

Planning permission to convert the underground car park into a hotel was initially refused at committee (ref: 2015/3605/P dated 04/02/2016), with 12 reasons for refusal, though reasons 3-12 could have been withdrawn with an adequate S106 agreement. The substantive reasons (reasons one and two) were on the grounds of standard of accommodation and impact on residential amenity. The refusal was appealed and subsequently allowed (ref: APP/X5210/W/16/3147078 dated 04/10/2016) subject to 13 conditions. This application proposes to discharge condition 10 (drainage strategy).

Relevant Planning History

The site has a long planning history to convert the underground car park into a hotel. For clarity, only the most recent and applicable applications have been listed here:

2015/3605/P - 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 – **Refused 04/02/2016, appeal allowed ref: APP/X5210/W/16/3147078 dated 04/10/2016.**

2019/0226/P - Details of external materials (Condition 5), cycle storage (Condition 6), & piling (Condition 7) 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' – **Currently under consideration.**

2019/1289/P - Installation of 3 x condenser units, at first floor level behind parapet adjacent to existing plant. 2 x to Great Russell Street and 1 x to Bedford Avenue, relocated from basement level (Retrospective) – **Currently under consideration.**

Relevant policies

Camden Local Development Framework Core Strategy (2010)

CS5 – Managing the impact of growth and development

CS13 – Tackling climate change through promoting higher environmental standards

Camden Development Framework Policies (2010)

DP22 – Promoting sustainable design and construction

DP23 – Water

Supplementary Planning Policies

Assessment

1. The proposal

1.1. This application seeks planning permission for the following works:

- Discharge of condition 10 (drainage strategy) of application 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016. The applicant has submitted a drainage strategy and supplementary information to discharge the condition.

2. Revisions

2.1. No revisions were received during the course of the application.

3. Assessment

3.1. Condition 10 of the appeal decision states:

Development shall not commence until a drainage strategy has been and submitted to and approved in writing by the local planning authority. The strategy should be prepared in consultation with the sewerage undertaker and should demonstrate 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. The drainage strategy shall be implemented as approved before the first occupation of the development hereby permitted.

3.2. The agent has submitted a drainage strategy and supplementary information detailing how the foul water would be managed. It confirms that the existing main runs and sewer connections would be utilised, with enhanced pumping infrastructure, and the introduction of back-up and warning systems in the event of a pump failure. It confirms that the discharge rate would be limited to 8l/s which is within Thames Water's maximum allowance of 11l/s for this development, as confirmed in writing, in its letter dated 20/08/2018 accompanying the application. The proposal would utilise the existing surface water drainage system, and given that the site does not consist of any external areas, surface water would be very minimal.

3.3. The submitted strategy and supplementary information have been assessed by the Council's Structures Manager and Environmental Services Officer, whom confirm acceptability of the scheme.

3.4. The details are considered to be appropriate and in accordance with 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.

Recommendation:

Grant conditional planning permission

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Monday

24th June 2019, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'.

Application ref: 2019/1118/P
Contact: Ben Farrant
Tel: 020 7974 6253
Date: 12 June 2019

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MRPP
21 Buckingham Street
London
WC2N 6EF

DRAFT

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Approval of Details Granted

Address:

112 A Great Russell Street
London
WC1B 3NP

Proposal: Details of drainage strategy (Condition 10) 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'.

Drawing Nos: Thames Water Letter ref: DS6050192 dated 20/08/2018, Drainage Strategy by 'My Construction' (Rev.01), & Letter from MRPP dated 27/01/2019.

Informative(s):

- 1 You are reminded that conditions 3 (air quality report), 5 (materials), 6 (cycle parking), 8 (piling), 9 (acoustic report) & 12 (electrical plant) of planning permission 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016 are outstanding and require details to be submitted and approved.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2019.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Director of Regeneration and Planning

DRAFT

DECISION