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Our Ref: 161/35/MER.20-4/2978863v1

23 July 2015

Development Management
Camden Council
Camden Town Hall
Judd Street
London
WC1H 9JE

By post and email:

Alex.McDougall@camden.gov.uk; and planning@camden.gov.uk

Dear Sirs

112A Great Russell Street, London WC1B 3NP
St Giles Hotel
Application Reference: 2015/3605/P

We act on behalf of clients who reside at a property in close vicinity to the St Giles Hotel, Bedford Avenue, London WC1B 3AS.

Our clients have forwarded us an email, which they have received from the Chairman of Bedford Court Mansions Limited with regards to the submission of a planning application (reference 2015/3605/P) ("the Application") on behalf of Criterion Capital which proposes to change the use of the current underground car park beneath the St Giles Hotel ("the Hotel"). If this application is successful, it will increase the occupancy of the St Giles Hotel from 240 bedrooms to 870 bedrooms.

Our clients are aware that a similar application by Criterion Capital was refused by the Council last year regarding a proposed change of use of the underground carpark area. Our clients are concerned that the Application and accompanying design proposal are almost identical to last year's refused application. It is also concerning that the entrance to the Hotel will use the existing car park entrance on Great Russell Street and that all vehicle servicing, refuse collection, air-conditioning and ventilation plant will be at pavement level on Adeline Place (directly opposite our client's property) including substantial provision for "fresh air" intake and extraction for the proposed expanded Hotel. We note from the Application that the

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air-conditioning and ventilation plant will operate all day and night, 365 days a year to service the huge increase in bedrooms that will be situated underground.

Our clients would like strongly to oppose the Application and we have set out a non-exhaustive list of Council policies below that we believe will be contradicted if the Application is successful:

- 1) Camden's Core Strategy - CS5 and CS9 – managing the impact of growth by protecting amenity, balancing the development needs of local needs and character as well as respecting the local residents' needs and quality of life.
- 2) Camden Development Policies - DP12 – the development of other town centre uses that will cause harm to the character, amenity, function and quality of life to local residents.
- 3) Camden Development Policies – DP26, DP28 and DP32 – improving and protecting the local environment and quality of life (with particular attention to managing the impact of development to residents, to limiting environmental degradation and improving the air quality in Camden).
- 4) Camden Development Policies - PPS12 – The Area Action Plan for Bloomsbury and Fitzrovia includes the land subject to the Application. PPS12 states that Area Action Plans should be used to “protect areas particularly sensitive to change.” This is inclusive of protecting the specific threats to the Bloomsbury Conservation Area and the spread of late night activity out of Soho and Covent Garden, which is contrary to Council policies CS7 and DP12.

Notwithstanding the above, we have also set out below our clients' general concerns regarding the Application:

- 1) The precedent that will be set for other car parks in Central London if the Application is successful.
- 2) The over development of the St Giles site for a single hotel use given the proposed change of use of the underground car park space (a currently quiet area) to nearly quadrupling the bedroom occupancy of the Hotel.
- 3) The erosion of the interface between two distinctly different areas of urban development: the Bloomsbury Conservation Area and the commercial corridor of the Tottenham Court Road.

- 4) The considerable loss of off-street public car parking and the natural effects that this will have on local businesses and on the demand for on-street parking which is already very limited.
- 5) The proposed 24-hour opening time for the Hotel will encourage the night time economy to extend out of Soho and Covent Garden into what is still predominantly a residential area.
- 6) The natural increase and intensification of greater pedestrian movement as a result of an expansion to the Hotel.
- 7) An increase in servicing and refuse collection, which is already a severe issue, in a manner that would be in contravention of the planning permission granted for the original development of the Hotel.
- 8) An increase in noise from the air-conditioning and ventilation plant which is, again, already a severe problem (as the Council is aware).
- 9) A degradation in the air quality to local residential buildings.
- 10) The threat to public health, safety and security as a result of the proposed expansion of the Hotel for the reasons given above.
- 11) The adverse impact on residential amenity and quality of life without any particular economic benefit.
- 12) The adverse economic impact on the prosperity of other established hotel businesses in the area.
- 13) The fact that the Application is incompatible with the Council's ambitions for Tottenham Court Road, which are to improve the area and make it a more pleasant, less intense and more human place to be. Furthermore, the Council's West End project is to create a high quality public realm, including the pedestrian environment.

We hope that that our clients' above representations are helpful and we ask that this letter is brought to the attention of the Council when considering the merits of the Application.

Please do not hesitate to contact our Max Robinson if you have any further questions or queries.

Yours faithfully



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