



**112A GREAT RUSSELL STREET, LONDON WC1B 3NP**

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 GROUND FLOOR ELEVATIONS ON GREAT RUSSELL STREET AND ADELINE PLACE.

Application for planning permission: 2015/3605/P

2 August 2015

The Bloomsbury Association objects to this application and a summary of our concerns follows:

**1 Over development**

The proposed change of use represents cumulative over development of the site for a single hotel use. Its impacts on and off-site cannot be shown to be manageable.

**2 Environmental impact**

The development proposal will be over-heavily reliant on conditions to regulate and control its severe environmental impact on residential uses on Adeline Place, the effect of which will extend to 24/7 - an impact that has not been satisfactorily resolved in technical information submitted with the application. Planning control mechanisms are a poor substitute for certainty and this would place an impossible burden on both local people to report incidents of malfunction and on the Council to monitor and enforce such conditions. It would also be wholly inappropriate to use a S106 agreement for this purpose.

- *Detrimental environmental impacts that cannot be effectively mitigated against.*
- *Intensification of use and extension of the period of its consequential environmental impact to 24/7.*
- *Intensification of noise from air-conditioning and ventilation plant, already severe problems, and extension of the period of its impact on the local noise climate to 24/7.*
- *Adverse impact on air quality in the vicinity of residential buildings 24/7.*
- *With no recent or properly sited noise survey, the basis of the noise impact assessments is fundamentally flawed.*
- *With no recent air quality testing and no account having been taken of recent Council enforcement action against air pollution from existing ground level uses and from coaches servicing the St Giles Hotel, the basis of the air quality assessments is fundamentally flawed.*
- *With no provision for specifying plant type or ongoing maintenance, the assumptions of the noise and air quality assessments are unsupported.*
- *Creation of a demand for formal and informal patron and staff facilities off site, 24/7, with consequent additional disturbance and noise generation in the vicinity of residential buildings.*
- *Loss of existing staff facilities for the St Giles Hotel.*
- *Impact on residential amenity and quality of life, 24/7.*
- *Intensification of pedestrian traffic, with consequential disturbance, 24/7.*
- *Inadequate provision for refuse storage and collection for all uses on the site resulting in the provision of permanent refuse storage on the public footpaths for these uses, which is located outside the proposed hotel entrance.*
- *Failure to meet the Council's targets for sustainable development.*

### **3 Transportation impact**

No weight can be given to the assumption that most guests will arrive through public transport and that there will be no coach bookings as there is no effective control mechanism and this may change. With the business model proposed coach bookings are a strong possibility.

The development proposal will intensify on-street servicing and refuse collection on Adeline Place, where there are already problems, in contravention of legally binding planning conditions. This will have severe residual cumulative transport impacts.

The proposal will result in the loss of off-street public car parking.

- *With no account having been taken of mini-cab and rickshaw traffic generated by existing and proposed hotel uses, the traffic impact assessment is fundamentally flawed.*
- *Consequential intensification of servicing and refuse collection for those uses catering for patrons off-site, 24/7.*
- *Failure to properly account for the consequences of traffic management measures arising from the Council's West End Project, which will increase coach and service vehicle use on Adeline Place and impact on air quality.*
- *Lack of capacity on the public footpaths at the points of contact with the surface that will harm pedestrian movement.*
- *Loss of off-street public car parking and the effects this will have on businesses and on the demand for on-street parking.*

### **4 Life safety**

There are significant threats to public health, safety and security, both internally and externally. Air intake to a use such as this is fundamental to its viability as are back-up systems and smoke exhaust in the event of fire. These are all provided at street level, which is a fundamentally flawed approach in an urban environment.

There has been limited consideration of how the proposal would look to mitigate crime and anti-social behaviour arising from the intensification and nature of uses within the immediate locality of the site. 'Guest management' is so loosely worded as to be meaningless.

- *Lack of good air quality on the street at the points of air inlet that would harm occupancy within.*
- *Life safety in the event of fire for the building as a whole.*
- *Lack of any crime impact assessment in order for the Council to fulfill its obligations under Section 20 of the Crime and Disorder Act 1988 and paragraph 132 of CLG's Guidance on Information Requirements and Validation.*
- *Michael Hughes, former Head of Development at Criterion Capital, when discussing similar proposals for change of use of the Trocadero to a windowless pod hotel in The Economist on 14 January 2012, says: "Once you take the window out you can just pack them in".*

### **5 Operation**

It is well-founded principle that planning permission runs with the property, not the owner/operator and it would be difficult to bind a future user/operator to the Hotel Management Plan. It is inappropriate to use a S106 agreement for this purpose, as it would be unreasonable to bind any future occupier or third party to a previous agreement.

### **6 Wider impact**

The development proposal will erode the interface between two distinctly different areas of urban development: the Bloomsbury Conservation Area and the commercial corridor of Tottenham Court Road.

It will stimulate 24-hour use and encouragement for the nighttime economy to extend out of Soho and Covent Garden.

It will have adverse economic impact on the prosperity of established budget hotel businesses in the area.

- *Incompatibility with the Council's ambitions for Tottenham Court Road, which are to improve it and make it a pleasanter, less intense and more human place to be, and of the Council's West*

*End project to create a high quality public realm, including the pedestrian environment.*

- *Through its most likely patron base, stimulating the 'heart of West End' land use characteristics of Piccadilly Circus and Leicester Square to migrate to the eastern end of Oxford Street, with an impact on the character and potential quality of St Giles Circus.*
- *Planning precedent for the re-use of other car parks in Central London.*
- *Impact of dead frontages on the streetscape and character of the Bloomsbury Conservation Area and on the visual and aural setting of listed adjoining listed buildings in Bedford Square and on Great Russell Street.*

For all these reasons, the grant of planning permission would be unsafe and inconsistent with the Council's and national planning policies. The Bloomsbury Association has contacted the applicant, Mark Cooper, Criterion Capital's Head of Planning, to discuss these concerns and there has been no response.

Clearly these are complex issues and we will be elaborating further on these in a later submission. In the meantime we would be grateful if you would let us know of any further modification to the application.

Jim Murray  
Chairman  
**Bloomsbury Association**

*Copies to:*  
Keir Starmer, MP  
Andrew Dismore, GLA  
Councillor Adam Harrison, London Borough of Camden  
Councillor Sabrina Francis, London Borough of Camden  
Councillor Rishi Madlani, London Borough of Camden  
Councillor Sue Vincent, London Borough of Camden  
Alex McDougall, London Borough of Camden  
Bloomsbury Conservation Area Advisory Committee  
Local residents and businesses