

22 August 2015

Development Management
London Borough of Camden
5 Pancras Square
London N1C 4AG

Dear Sirs,

112A GREAT RUSSELL STREET, LONDON WC1B 3NP

Application for planning permission: 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 ground floor elevations on Great Russell Street and Adeline Place

I object to the granting of planning permission for this proposal and am very concerned about the impact of a development of this nature and magnitude on the resident community and on the degeneration of the surrounding environment.

The proposed change of use represents over development of the site for a single hotel use. It increases hotel use on the application site by 23% to the extent that its impacts are unmanageable. In addition to the existing 720 rooms of the St Giles Hotel, there are five other hotels in the immediate vicinity: Bloomsbury Hotel, Kenilworth Hotel, Bloomsbury Street Hotel and Cheshire Hotel. These accommodate, in total, 1271 rooms. This proposal will add a further 166 rooms, an area increase of 13%. This is an area that is popular with tourists because of its proximity to the British Museum and hotel use might be considered appropriate. Indeed the Mayor seeks another 40,000 hotel rooms in Central London by 2031. However, they cannot all be in Bloomsbury nor can they all be on the site of the St Giles Hotel because the impact of such an intensification of use cannot be effectively managed - and that is what we understand to be what differentiates appropriate development from over development, where it results in more damage than benefit. In this instance, the impact of over development is even greater because the new use is a separate operation, independent of the hotel above and with a duplication of all necessary support services either on or off-site.

The applicant has attempted to explain how concerns expressed on previous applications that were either refused or withdrawn, have now been overcome. This is a shallow justification that seems to be more to do with preparing the ground for a future appeal rather than resolving the very real technical issues to do with the life support and service systems needed to make underground habitation work, and with their major impact in terms of noise and air quality when positioned at street level, opposite existing homes.

The proposed development will be heavily dependent on air conditioning and ventilation at all times. I also understand that it will also require an additional sub-station at street level. This equipment will create unacceptable noise emissions and environmental pollution that will erode residents' rights for rest and peace in their homes. Equally, it relies entirely on fresh air intake and exhaust at street level on Adeline Place where there is already a problem with plant noise, fumes and emissions from existing uses and vehicles that the Council is currently taking enforcement action against.

I am immensely concerned about the threat to public health, life safety and security, both internally and externally, from backup systems in the event of malfunction of fresh air intake and from smoke exhaust in the event of fire. I also note that there is no crime impact assessment included with the application which, with an active street market for class A drugs on Bainbridge Street, drug dealers and prostitutes on street corners, concerns me greatly when pod hotels such as this may let rooms on an hourly basis.

Despite what the applicant's consultants claim, the proposed development will also generate (directly and indirectly) more traffic from servicing vehicles, coaches, taxis, minicabs and rickshaws, which already constitute a nuisance with which we live. Additionally there will be more pedestrian traffic: arrivals and departures, revelers, smokers and fast food consumers who will use the surrounding public spaces. It has to be noted that this 'hotel' will contain no dining, no drinking and no social space. Its patrons will look for these facilities on nearby streets, probably early in the morning and late at night. Noise from pedestrians, anti-social behaviour and debris left behind will impact negatively on the tranquility and security of a residential enclave already under stress and on the character of the Bloomsbury Conservation Area.

I urge the Council refuse permission for this application.

Yours faithfully,

Mrs S Heath