



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 ADELIN PLACE.

Application for planning permission: 2015/3605/P

2 November 2015

The Bloomsbury Association objects to this application and a summary of our concerns was contained in our representation dated 2 August 2015. We indicated that we would be elaborating on these in subsequent submissions, of which this is one. Further comments will follow.

The applicant has submitted revised documents to the Council that were uploaded to the planning website between 28 September and 23 October 2015. They are all in response to comments made on the original submission. Amongst them are the following, which we have now reviewed:

- Information Pack
- Community Consultation Statement

In accordance with paragraph 193 of the NPPF, the Council has published a list of local information requirements required in support of a planning application. In relation to this list, paragraph 14-040 of Planning Practice Guidance adds: *'In addition to being specified on an up-to-date local list published on the local planning authority's website, information requested with a particular planning application must be:*

- *Reasonable having regard, in particular, to the nature and scale of the proposed development; and*
- *about a matter which it is reasonable to think will be a material consideration in the determination of the application (Reference ID: 14- 040-20140306).'*

Camden's Local Area Requirements for Planning Applications, February 2014, specifies that for major planning applications or applications likely to generate significant public interest, a Pre-Application Consultation Statement should be submitted with the application. This objective is consistent with paragraph 189 of the NPPF, which encourages pre-application engagement with local communities prior to the submission of planning applications. This states: *'Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage... They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications.'* This did not happen and therefore questions the validity of the application.

Despite the previous application attracting 106 letters of objection, the applicant has not undertaken any meaningful discussions with local residents or businesses either prior to this or earlier planning applications being submitted. Indeed, the *Evening Standard*, dated 15 June 2012, the developer is reported as having said: *"There are no residents within at least 500 metres"*. By failing to engage with the local community, the proposed development cannot be said to have fully accounted for and mitigated potential impacts. A consultee on the current application has suggested that the applicant be advised to withhold the current application until he has engaged in meaningful discussions with the local community.

This has still not taken place. The political lobbyist engaged by the applicant, Thorncliffe Communications, have focused their attentions on Members of the Council who will be influential in

determining the application, not the local business and residential community that will be directly affected by its impact. The applicant appears unaware of and disinterested in local concerns.

The spurious Community Consultation Statement notes: *'We publicised the application to local stakeholders by distributing an information letter. The objective of the letter was to inform the local community about the plans and provide contact information should they have any questions about the proposals. In addition to the letter we sent out an Information Leaflet setting out in more details the plans submitted by the applicant.'*

The Association or local residents saw none of these documents before they were uploaded to the Council's web site on 28 September and 23 October. The application was made on 24 June.

The Statement goes on to say: *'The applicant's representatives have met with the Chair of the Bloomsbury Association to discuss the application in detail, and hear their concerns around the redevelopment. This led to the applicant producing an Information leaflet on the proposed development answering the queries raised by the Bloomsbury Association.'*

This is rubbish. I met with Jacob Lister of Thorncliffe on 15 July 2015. No detail was discussed. We met to introduce ourselves. It was explained that Thorncliffe are a Planning PR company with strong links to the Labour Party and Camden Council. I was asked if there was anything they could do that would allow us to stay silent or support the application. The inference was clear. Thorncliffe were asked to send us various details and to inform us of a contact person within GVA, the planning consultants. They were also asked to send us a full specification of the air intake and extraction proposal in due course. No information was received and there was no further contact. Indeed, as we pointed out in our later dated 2 August, the Bloomsbury Association contacted Mark Cooper, Criterion Capital's Head of Planning, directly to discuss our concerns and there was no response.

The Statement also says: *'The applicants have also engaged significantly with the Bedford Court Mansions residents: they have given detailed responses to and engaged with the residents' contractors and surveyors... In addition, the applicant engaged a community outreach team from Your Shout to call on local residents and businesses, to raise awareness of the proposals, answer questions and invite participation in the consultation.'*

The Chairman of Bedford Court Mansions will respond to this. We understand that, in October and prior to arranging for a flat in the Mansions to be used as a suitable location opposite the site to carry out a new sound survey to replace the original which was deficient, there had been no contact with the applicant or with Thorncliffe.

We reject the Statement's claim that *'The applicant has attempted at every stage of the application to accommodate the concerns and requests of the local stakeholders.'* This is misleading and leads us to be skeptical that the application is also misleading. With such a demonstrable manipulation of fact by the applicant, we question whether the information submitted with the application can be considered sufficiently robust to technically justify that the proposal, whilst undoubtedly enhancing asset value, can really be delivered without unmanageable harmful environmental impact. We have commissioned our own review of this information and we conclude that it cannot.

The grant of planning permission on this basis would be unsafe and inconsistent with the Council's and national planning policies. The Bloomsbury Association's objection to the application as described in its letter dated 2 August 2015 still stands and we therefore urge the Council to refuse 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

Raymond Yeung, London Borough of Camden

Bloomsbury Conservation Area Advisory Committee

Local residents and businesses