



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

15 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.

The applicant has since revised information submitted with the original application but has not varied the design proposal. These submissions were made available for comment between 28 September and 6 November 2015.

This submission is concerned with the following issues that were raised on 2 August and have not been resolved:

- Impact on residential amenity and quality of life, 24/7;
- Inadequate provision for refuse storage and collection;
- 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.

Refuse storage and collection

Core Strategy CS18, Dealing with our waste and encouraging recycling, states: "*The Council will... make sure that developments include facilities for the storage and collection of waste and recycling.*" CS18.10 goes on to say, "*The Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste*" and refers to the Council's Camden Planning Guidance supplementary planning document.

LDF Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) states, "*The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors we will consider include:*

- a) *Visual privacy and overlooking;*
- b) *Overshadowing and outlook;*
- c) *Sunlight, daylight and artificial light levels;*
- d) *Noise and vibration levels;*
- e) *Odour, fumes and dust;*
- f) *Microclimate;*
- g) *The inclusion of appropriate attenuation measures.*

We will also require developments to provide... facilities for the storage, recycling and disposal of waste."

Camden Planning Design Guidance CPG1 states: "*Planning for waste recycling and storage should ensure that developments accommodate:*

- *Adequate space (designed) for the storage of waste and recyclables;*
- *Safe location - accessible for all users and collectors and minimise nuisance to occupiers and neighbours (and their amenity space) e.g. noise, obstruction, odours, pests, etc;*

- Refuse collection for any waste contractor (and allow for reasonable changes to collection services in the future);
- Containers should have designated storage areas; and
- Sensitive designed/located, especially in conservation areas/or listed buildings."

CPG1 provides no specific design guidance on the standard of provision to be made for refuse storage and collection from hotels.

BS 5906:2005 provides a Code of Practice for methods of storage, collection, segregation for recycling, recovery and on-site treatment of waste from buildings in various uses. It is applicable to new buildings, refurbishments and conversions of residential and non-residential buildings and is a standard source of reference for other local authorities in situations where specific policy or design guidance is lacking.

In determining the storage, containment and equipment requirements for effective waste management and that adequate space is provided, the BS provides guidance in respect of waste generation for commercial premises. For a 3-star hotel, as is proposed, 250 litres of waste arisings are assumed a week for each bedroom. A 166-bedroom hotel would therefore produce 41,500 litres of waste a week. This would require storage capacity for 38 x 1,100 litre bins if collected weekly and 6 x 1,100 bins if collected daily. Drawing 2897/P/11F, submitted with the revised application indicates only 3 x 1,100 bins, which would be inadequate provision for the hotel. Capacity could be reduced by use of a compactor but there is no mention of this in the application. There does not appear to be sufficient space to accommodate a compactor nor would it comply with LDF and CPG criteria to minimise noise and nuisance to occupiers and neighbours.

There appears to be no provision for recycling. Section 9.5 of the draft Hotel Management Plan states *"Every effort will be made to recycle refuse in accordance with LBC guidelines. Further details will be set out in the Servicing Management Strategy to be approved by Camden prior to occupation."* This does not accord with CS18 or CPG1 and it is not sufficient for something so fundamental as this to be resolved after any planning permission is granted.

Furthermore, there appears to be no lawful access to the refuse area for the storage and collection of refuse other than by use of the fire escape path which would be in breach of Part B of the Building Regulations: Fire Safety. We also note that Section 9 of the draft Hotel Management Plan fails to explain how refuse is to be brought from the below ground hotel floors to the storage area. Use of the adjacent firefighting lift as a goods lift would also be illegal. A hotel would never be permitted to operate on this basis and the outcome would inevitably be refuse storage on the public highway. This is confirmed to be the applicant's intention in Section 9.4 of the draft Hotel Management Plan. Criterion Capital's current tenants, who occupy retail units on the frontage to Tottenham Court Road, dump their waste on the footpath on Great Russell Street immediately outside the entrance to the proposed hotel - see photograph. We note that this waste storage facility has been omitted from the photomontaged images submitted by the applicant in support of the application.



Our comments on access for waste collection vehicles are included in our letter dated 8 November 2015.

We note that Section 1.2 of the draft Hotel Management Plan states, *"Following post-submission consultation with local stakeholders, and in response to consultation responses received by Camden, this document has been updated to address key local concerns."* As confirmed by Bedford Court

Mansions in their comments dated 9 November there has been no local consultation and the applicant has no knowledge or interest in local concerns. This adversarial approach towards local residents is made clear in Section 3.1.22 of the Transportation Statement by including the quotation "A recent appeal decision for a hotel in the area at Brook House found that on- street servicing of a hotel would not cause any material harm to the living conditions of local residents."

This conflicts with Policy DP26. It also conflicts with the permission for development of the building, dated 30 September 1975, reference P13/8/A/20545, granted under the Town and Country Planning Act 1971, which restricts servicing of the building. Condition 5 of the permission states: "No loading or unloading of goods, including fuel, by vehicles arriving at or departing from the premises shall be carried out otherwise than within the curtilage of the building." The reasons for imposition of the condition are given as: "To avoid obstruction of the surrounding streets and to safeguard amenities to adjacent premises". The condition relates to the whole building and, as confirmed by Policy DP26, amenity is as relevant now as it was then. The building is the same, the proposed use is the same and the residential neighbours are the same. It is a material consideration and is not to be discounted as an irrelevance as the applicant's consultants suggest.

As our comments on the 13 September and 18 October 2015 have shown, in addition to refuse storage, a lot of plant and large air handling ductwork will need to be accommodated in a very constrained space at ground level on and between the two existing ramps on Adeline Place. An electricity substation, staff cycle parking, fire escape stair and a new lift is also included. There will also be a need to maintain existing air-conditioning and ventilation equipment in this location serving the St Giles Hotel and its tenants, which appears to have been conveniently ignored, as has maintenance of the width of the fire escape route.

Ultimately, the viability of the proposal is dependent on being able to accommodate all this but current information accompanying the application does not convincingly demonstrate that this would be feasible. An attempt has been made to squeeze too much into too small an area and it does not work. There are some 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, directly opposite existing homes. We have reviewed the revised documents recently submitted and are not convinced they are sufficiently robust to demonstrate that the proposed development would work technically.



In the early hours of 24 October a fire broke out at the St Giles Hotel and the building was evacuated. In all the time that I have lived in Bloomsbury, I have seen the below ground YMCA Club evacuated but never the accommodation above and it was quite frightening. It was uncomfortable for the crowds of guests who stood on the street in the cold from 01:30 to 03:30, some wearing not much more than

hotel towels, but we understand there were no injuries. The photographs leave us wondering how things might have been with another 300 guests evacuated from the depths onto the footpath of Adeline Place strewn with rubbish and waste bins.

In the Camden New Journal, in June 2012, Criterion Capital's previous architect for an almost identical proposal is reported as having said that: *"It is a very challenging job and possibly one of the riskiest applications I have done so far"* and *"...we worked out that the ducting will fill up all the space in the ramps and, in fact, nearly 40 per cent of the floor space will be used for storing services such as ventilation system... for the development."* And that is the crux of the problem: a hotel that is five floors underground is not an economic use of resources. It is not sustainable and does not meet LDF Policy DP22. Its air-conditioning, ventilation, smoke exhaust systems and servicing needs, including refuse, all need to connect to the surface at pavement level on Adeline Place, directly opposite residential buildings. They will all have a huge environmental impact and that represents an intolerable loss of amenity.

The proposal does not provide adequate facilities for recycling and the storage and disposal of waste; it is not accessible for all users and collectors in a way that will minimise nuisance to occupiers, neighbours and the public and it has not been sensitively designed with regard to the Bloomsbury Conservation Area that it faces. It fails to comply with Camden's Core Strategy Policy CS18 and Policy DP26 of the Local Development Framework.

It also fails to comply with Principle 9 of the Fitzrovia Area Action Plan concerning residential amenity, which states: *"The Council will have regard to the particular impacts on residential amenity that arise from the dense mix of land uses in Fitzrovia, and will seek:*

- *A good standard of amenity for all existing and future occupants of land and buildings; and*
- *To prevent cumulative harm to residential amenity from noise, mechanical ventilation, light pollution, deliveries and waste collection".*

Furthermore, whilst the London Plan calls for additional hotel space it does not support intensification of this use class. Policy 4.5 states: *"Further intensification of provision in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses."* The proposal does cause material harm to the living conditions of local residents.

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, is reported as saying: *"Once you take the window out you can just pack them in"*. Nothing has changed - amenity be damned.

Streetscape and the adjoining Bloomsbury Conservation Area

While the St Giles Hotel may be on the boundary and just outside the Bloomsbury Conservation Area, it is still seen from within it, and therefore English Heritage and other conservation bodies may legitimately say that such changes would affect its character and appearance. The character is not always related to appearance, so the change of use from car parking to hotel will also affect character through, among other things, a different pattern of comings and goings. The change from entrances to service areas with ventilation grilles will also have an effect on character and appearance.

Bedford Square is unique. It is acknowledged as one of the best preserved set pieces of Georgian architecture in London and in 2000, with substantial funding from Bedford Estate, English Heritage and the London Borough of Camden, its public realm underwent careful refurbishment to reflect the asset value of its heritage. Its buildings are Grade I listed and English Heritage defines Grade I buildings as being 'of exceptional interest, sometimes considered to be internationally important'.

The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. Policy 4B.12 seeks to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. This recognises that asset value is more than the fabric of the Square's buildings but in the spatial quality of the space that they define and the approaches to and from it. The hostile, steel shuttered and louvred elevation to Adeline Place is frighteningly awful and, together with its associated signage and lighting, will be dominant in views from the western side of the Square and will detract from its setting. These are not characteristics that are compatible with a policy that seeks to protect these values, nor are they consistent with the design principles for Bedford

Square contained in the Bloomsbury and Fitzrovia Area Action Plan.

Policy DP25 states that the Council will *"only permit development within conservation areas that preserves and enhances the character and appearance of the area"* and will *"not permit development that it considers would cause harm to the setting of a listed building"*. This proposal fails to satisfy on both counts.

The proposed modification to the building's cladding, by reason of its size, siting and method of construction would result in an overly dominant and incongruous addition that would be detrimental to the character and appearance of adjacent listed buildings, the streetscene, and Bloomsbury Conservation Area. The proposal is therefore contrary to policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's Heritage) of the London Borough of Camden Local Development Framework Development.

Until recent modifications, the original building was a mixed-use development containing shops, a hairdresser, a travel agent, office accommodation and studios for NBC, a pub, restaurants and public car park, nearly all of which had a frontage to Adeline Place. It provided natural surveillance and is what we now describe as an 'active frontage'. The proposed steel shuttered elevation to Adeline Place is visually unattractive and creates a 'dead', hostile appearance, which can affect the residential and commercial viability of the area and harm the pedestrian experience. It will encourage anti-social behaviour and crime on a street that already has severe problems with drug dealing and drug use. It clearly demonstrates the applicant's lack of any concern for the safety of our residential neighbourhood or the character of the Bloomsbury Conservation Area and is contrary to the principles of DP30 and Section 7 of CPG1.

We welcome the intention to reinstate the entire area of footway on Adeline Place to public use although we note that this is not clearly shown on any of the application drawings. As we explained in our comments on 8 November 2015, the status of part of the footway is in question. Whilst we are of the view that it is public highway, the Council has determined that it is 'private forecourt'. Furthermore we understand that it is land that is not within the applicant's control. We would welcome the inclusion of a Cycle Hire Docking Station proposed by TfL (draft Hotel Management Plan Section 7.1.7) and are surprised that this is being proposed at this stage without the usual formal consultation. It is not shown on the application drawings so we assume that it will be the subject of a separate planning application.

The Bloomsbury Association supports local residents in their objection to this proposal. The Association encourages good quality design that will enhance Bloomsbury's streetscape, which this proposal clearly does not.

For the reasons outlined above, we feel that this further demonstrates that the proposal represents an over development of the site for a single use - hotel - to the extent that its cumulative impacts on and off-site cannot be shown to be manageable. It is our view that the information accompanying the application is unsound and not sufficiently robust to demonstrate that the proposal is achievable without unmanageable, harmful environmental impact.

The grant of planning permission on this basis would be unsafe and inconsistent with the Council's and national planning policies. We therefore urge the Council to refuse the application.

Jim Murray
Chairman
Bloomsbury Association

Copies to:

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Bloomsbury Conservation Area Advisory Committee

Local residents and businesses