



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

22 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:

- Crime impact;
- 24-hour use and encouragement for the nighttime economy to extend out of Soho and Covent Garden;
- Economic impact on the prosperity of established budget hotel businesses in the area.

Crime impact assessment

The crime impact assessment makes reference to a review of the proposed design carried out against design criteria described in *Safer Places: The planning System and Crime Prevention*, published by ODPM in 2004. Although referred to in CS17, this document contains out of date advice and was withdrawn by the government in March 2014. It was replaced with new planning practice guidance paralleling the NPPF, which should be the basis for the assessment. This is summarised below.

Policy 58 of the NPPF states: *'Planning policies and decisions should aim to ensure that developments:*

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.'*

Policy 69 of the NPPF states: *'The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities... Planning policies and decisions, in turn,*

should aim to achieve places which promote:

- opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;
- safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.'

This proposal diminishes the existing mixed-use characteristics of the development. We have no concerns about Great Russell Street but on Adeline Place it further erodes what semblance of active frontage remains to create a poor quality public space where the fear of crime and disorder will undermine quality of life and community cohesion and discourage active and continual use. On Adeline Place the proposal detracts from the overall quality of the area, creates a visually unattractive streetscape and ignores the greater potential of the street frontage to respond to the area's local character and identity. It fails totally to meet any of the requirements of Policies 58 and 69 of the NPPF.

Furthermore, design guidance in the NPPF states: *'Planning should address crime prevention - Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. Local authorities may, therefore, wish to consider how they will consult their Police and Crime Commissioners on planning applications where they are Statutory Consultees and agree with their police force how they will work effectively together on other planning matters.'*

Camden Police are not included on the Council's list of consultees for this application. While the Police are not a statutory consultee, local planning authorities are required to consider whether there are planning policy reasons to engage other consultees who – whilst not designated in law – are likely to have an interest in a proposed development. A list of the organisations identified in national policy and guidance is set out in the NPPF and includes the Police. We have stressed to the Council that this is an application where the risk of crime may be an issue in relation to both design and use and where consultation with the Police should take place.

The NPPF goes on to say: *'Planning should promote appropriate security measures - Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive retrofits... Pre-application discussions between security advisors such as Counter Terrorism Security Advisors and police Crime Prevention Design Advisors will ensure that applicants are aware right at the beginning of the design process of the level of risk and the sorts of measures available to mitigate this risk in a proportionate and well-designed manner.'*

The crime impact assessment appears to have mainly considered the underground parts of the building and its entrance from Great Russell Street. Fundamentally, as with other aspects of the proposal, it has not considered cumulative effect, it has not considered the impact on crime of such a use and it has not considered the catalytic effect that the design of the frontage to Adeline Place will have on street crime and anti-social behaviour. It is not an 'active frontage' which attracts people and allows the street to be overlooked. It is not high quality, it does not present the image of a safe place that will encourage an increase in use that will, in turn, increase perceptions of safety and reduce opportunities for crime. It is proposing to create a hostile, uninviting place that will attract anti-social behaviour and street crime, not deter it. That is not to say that the existing arrangement is much better but we are looking for this to be improved upon substantially.

The hotel's intended market could be backpackers or nightclubbers but its proximity to the West End's late night entertainment industry and London's foremost street market for Class A drugs present very high risks. We are particularly concerned that one of the attractions of this type of windowless hotel is 24/7 operation, an aspect that is mentioned time and time again in the draft Hotel Management Plan.

There is no concept of day and night and guests can check-in at anytime and stay as long or as little as they wish. The Plan states: *'Arrivals and departures will occur sporadically throughout the day however they will be primarily centred around check in and check out times...'*. This is too vague and imprecise and is unenforceable. The very essence of the 'pod' or 'capsule' hotel concept is hourly lets at any time of the day or night, which would be ideally suited to the target market but also encourages some of the undesirable, established aspects of the night economy of this area: drug use and prostitution. It is by no mere coincidence that tout's vehicles wait outside a well-known lap-dancing club at the other end of Tottenham Court Road. We understand that this is a very real problem for residents in Bedford Court Mansions who have already experienced such things yet there is no consideration of the risk in the application documents. It is a concern that the applicant appears unaware of these very serious issues that go to the root of whether such a use is appropriate in this location.

On the night of 19 November 2015, there was a major Police operation against drug dealing on Adeline Place and Bedford Avenue. Some ten plain-clothes officers were involved and there were arrests. The Association, together with representatives of the Bloomsbury Hotel and Dominion Theatre had earlier met with the Bloomsbury Safer Neighbourhood Team to review the deteriorating level of drug related crime on these streets. The applicant does not appear to have consulted with the SNT or Camden Police Crime Prevention Design Advisor and seems unaware of these issues.

CS17, Making Camden a Safer Place, acknowledges the high levels of crime in Bloomsbury and states: *'The Council will aim to make Camden a safer place. We will:*

- a) work with our partners to tackle crime, fear of crime and anti-social behaviour;*
- b) encourage appropriate security and community safety measures in buildings, spaces and the transport system;*
- c) require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in areas with relatively high levels of crime, in particular Camden Town, King's Cross, Bloomsbury, Covent Garden and Kilburn;*
- d) ensure Camden's businesses and organisations take responsibility for reducing the opportunities for crime through effective management and design;*
- e) promote safer streets and public areas; and*
- f) address the impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres.'*

Camden's Core Strategy adds:

17.4 – *'Consideration of how crime, disorder and fear of crime can be addressed is an important element in good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all development to include appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment. These features should be incorporated into a scheme from the beginning of the design process; however, they should complement other key design considerations. All developments should also seek to design out risks from crime... This will be particularly important in the borough's areas of highest crime and measures should reflect any crime and antisocial behaviour problems specific to the local area. Further information on designing safer environments is set out in the Council's Planning Guidance supplementary document.'*

17.5 – *'The design of streets, public areas, and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment. The use of a site and the layout can have a major impact on community safety and the Council will seek 'active frontages' which attract people and allow streets to be overlooked. The Council wants to ensure that Camden's spaces and places can be used by all members of the community. People will make more use of high quality, safe streets and places and this increase in use will, in turn, increase perceptions of safety and reduce the opportunities for crime.'*

17.9 - *Camden's position in the centre of a major international city, its high profile, major transport interchanges and famous buildings and places make security an important issue in the borough. The Council will therefore expect the design of buildings, spaces and transport facilities to include appropriate and proportionate security and community safety measures.'*

Crime should not be seen as a stand-alone issue, to be addressed as a last minute exercise separately from other design considerations and only in response to comments made by the Association. That is why guidance on crime has been embedded throughout the Council's guidance on design rather than being set out in isolation.

It is acknowledged that new development for buildings and spaces, and alterations to existing, should be based on a thorough contextual analysis and provide good design that is appropriate to its location, scale and function and that creates a safe and secure environment that reduces the opportunities for crime without compromising community cohesion. This contextual analysis is lacking from the revised Design & Access Statement submitted with the application on 28 September.

It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. The applicant has demonstrated that he is not aware of local issues. Consideration also needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities. This means working closely with the Police to analyse and share relevant information and good practice. The applicant does not appear to have consulted with Camden Police.

The objective of the design should be to achieve Secured by Design accreditation. We would have expected that reference would have been made to the Secured by Design guide, Commercial Developments, Version 2 and the principles of crime prevention through environmental design (CPTD), particularly to improve opportunities for natural surveillance at the perimeter of the building. We would also have expected that there would have been consultation with Camden Police Architectural Liaison Officer / Crime Prevention Design Advisor, who should have made some initial comments on the proposal that had been addressed and mitigated in collaboration with the relevant parties as the design has developed. We would have expected that three years would have been enough time for this to have happened.

The applicant has not convinced us that they have adequately addressed the crime risks that the proposed hotel use and its design will present in the submitted crime impact assessment. The applicant has not demonstrated that they have incorporated design principles that contribute to community safety and security, particularly in an area such as Bloomsbury with relatively high levels of crime, nor have they taken responsibility for reducing the opportunities for crime through effective management and design. This is contrary to NPPF Policies 58 and 69 and Camden Core Strategy Policy CS17 and, on these grounds alone, the application should be rejected.

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

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 represents a significant intervention at this interface that will potentially set the tone of much of how the area will feel in years to come.

This is incompatible 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, it will stimulate 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.

We have previously noted that Criterion Capital are proposing a similar, Accor run, 'pod' hotel with 583 windowless rooms, that will open in the Trocadero on Piccadilly Circus in 2017; windowless Yotels also exist at Heathrow and Gatwick. All operate 24/7 and all are above ground. Precedence is important but it has to acknowledge that similar use patterns can result from different market drivers.

The demand is there but it is not effectively controlled. With Westminster's restrictive planning and licensing policies operating in Soho and Covent Garden, the pressure for development of the late night economy is intense and is moving out into the 'softer' hinterland. It does not help that the London Plan

identifies Tottenham Court Road and New Oxford Street corridors as areas for intensification of development. New Oxford Street is unbelievable in the early hours of Saturday and Sunday mornings and this type of facility is going to be extremely popular with club-goers as it will be with tourists once Crossrail brings it closer to Heathrow.

It is not 'heart of Bloomsbury' - which conjures up images of peaceful, green, leafy squares - it is the edge of Bloomsbury at a point where it collides abruptly and noisily with the fringes of the West End. It is an area that is subject to change and policy has to evolve and be applied to ensure that the impacts of that change are manageable without damage to residential amenity and Conservation Area sensitivities. Residents' experience, as evidenced by enforcement action that the Council has already taken, show that these criteria are not currently being met and that further intensification of development on this land is inappropriate.

It is important to note the qualification in the London Plan. 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.*' Intensification can be taken as both the quantum and duration of use and, by extending to 24/7, the proposed development does cause material harm to the living conditions of local residents and the balance of land uses.

In particular, we ask that the application of Council policies should consider most carefully the interface between the proposal site and the surrounding conservation areas. It might well be that this site is considered too remote from the core of the West End to warrant 24-hour use intensification. As the Character Area Studies in the Area Action Plan for Bloomsbury and Fitzrovia clearly demonstrate, Bedford Square, Great Russell Street and Adeline Place are not Piccadilly Circus or Leicester Square.

Core Strategy Policy CS9 states: '*The Council will... take into account the specific identity of the areas within Central London when taking decisions on planning applications*'. Fitzrovia Area Action Plan, Principle 8 states: '*Camden Core Strategy 2010-2025 and Camden Development Policies 2010 recognise the importance of the visitor economy in Camden, support proposals for additional visitor accommodation, and guide large scale visitor accommodation to Central London, particularly its Growth Areas. However, our policies also indicate that development in Central London should protect the characteristics of local areas and communities and contribute to strong and successful communities by protecting residential amenity and supporting community facilities.*'

Economic impact

Policy DR14 states '*All tourism development and visitor accommodation must not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems. The Council will protect existing visitor accommodation in appropriate locations.*'

In the Evening Standard report of 10 June 2012, the applicant is reported as having said the proposed hotel '*will provide budget accommodation in the heart of an expensive city.*' Rooms at £80 a night are mentioned. In the Camden New Journal the previous architect is reported as having said '*With hotel demand still high in the area, and average cost of renting a hotel room still relatively expensive, they envisaged converting the two-storey basement car park into potentially the cheapest hotel in zone one.*' In the past three years, the cost of visitor accommodation in Central London has increased. In an interview with Asif Aziz, CEO of Criterion Capital, on 20 November last year, the Evening Standard reported room costs between £100 and £150 a night in the proposed Trocadero hotel.

Gower Street and Bloomsbury Street are well-established locations for budget accommodation in Bloomsbury where hotels currently provide accommodation at the following nightly rates. There is a view that this proposal may place too large a share of the market - what will be a total of 886 budget hotel rooms - in a single location to the detriment of the prosperity of small local businesses that presently provide budget accommodation elsewhere in Bloomsbury.

	No of Rooms	Single room £	Double room £
Gresham Hotel	43	45-60	55-80
Ridgemount Private Hotel	32	57-73	86-106
Jesmond Hotel	15	60-70	90-120
Gower House Hotel	6	70-115	80-155
Regency House Hotel	14	90-116	98-116
Garth Hotel	18	49-55	69-79
Arosfa Hotel	16	86	130
Hotel Cavendish	33	50-65	65-80
Staunton Hotel	17	89	105
Morgan Hotel	20	120	145
Arran House Hotel	28	95	125
The Academy	49	226	383
Palace Hotel	35	125	155
Total / average	326	95	129

Prices as at October 2015

The economic benefit of the proposal is also questionable. The proposed development will add little to the true economy of the area, other than providing local restaurants, cafes and bars with more custom, particularly those within the St Giles Hotel. The application form states that the proposal will result in 24 full-time employees compared to the 4 full-time employees of the existing car park. We are skeptical of this assessment. The number of jobs created seems large in proportion to the number of rooms and would likely be occupied by those living some distance away. A view of the numbers of jobs likely to be created as a result of the development is also implied in a statement by the previous architect who is reported by Camden New Journal as having said '*The client is considering installing automatic, self-service check-in/check-out vendor machines... This will save cost on staff.*' There may, of course, be wider economic benefits but these may only benefit the economy of the Isle of Man, where Central London Investments Ltd is registered.

The Bloomsbury Association supports local residents in their objection to this proposal. 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 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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