



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

29 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.

We have previously drawn to the Council's attention that information submitted in support of the application is not sufficiently robust to demonstrate that the proposal is deliverable without unmanageable, harmful environmental impact. Indeed, we are becoming concerned that the information gathered through internal consultation by the Council is also insufficiently robust as a bias for determining the application. Two observations during the past week are described here and illustrate our concern.

The applicant's transportation consultant states in their submission dated October 2015 *'there are no valid points being raised by the Bloomsbury Association and their Transport Consultant. Furthermore, LB Camden, as highway authority, have not raised similar concerns and therefore, we do not feel it appropriate to give too much weight to the points raised.'* They also state *'The Council have adopted a pragmatic approach in respect of servicing and recognise that any potential impact will be minimal, especially bearing in mind the nature of the hotel with no catering or conferencing facilities. This is reflected in the officer report for the previous application which noted "A recent appeal decision for a hotel in the area ... found that on-street servicing of a hotel would not cause any material harm to the living conditions of local residents. It appears that on-street servicing is a common arrangement for hotels in the area and there is sufficient space to allow it."*

They continue *'In respect of Adeline Place, the refuse provision will be wholly accommodated within the site and appropriately screened; its impact will therefore be minimal' and 'The lack of catering facilities ensures that servicing and refuse collection is kept to an absolute minimum i.e. there will be no need for an early morning delivery to a restaurant as it is claimed to be the case with St Giles, because no restaurant will be provided.'*

That no restaurant will be provided is misleading and totally undermines the credibility of the application. The proposed hotel entrance on Great Russell Street is immediately adjacent to the entrance to VQ (Vingt-Quatre), a recently established 120-seat restaurant, cafe and bar, which is open 24 hours a day, seven days a week that has recently extended its licensed hours from 2am to 4am. It used to be a luggage shop and then became a restaurant operating in planning use terms as ancillary to the St Giles Hotel without ever having been tested in an application for change of use. It became an independent operation last year. It would be entirely reasonable to expect that it will become the defacto restaurant and bar to the proposed underground hotel. Its business will grow dramatically and its servicing needs will increase correspondingly. The impact of this intensification of use is not considered in the application.

As part of the St Giles Hotel, VQ operates under the planning conditions limiting servicing and waste storage and collection that apply to that (YMCA) building. However, in practice, its servicing is off-street from Adeline Place. It has no dedicated refuse storage and its waste appears to be deposited daily in the Council's community refuse bins located outside the proposed hotel's entrance on Great Russell Street. **The photograph** was taken on 21 November and shows VQ staff disposing waste into the street community bins, the wheeled bin having been brought from their service entrance on Adeline Place. Both servicing and refuse disposal is currently dealt with through an access door next to the fire stair exit on Adeline Place that will be removed as part of the applicant's proposal.



This highlights our concern about the cumulative impact of intensification of use on servicing and waste management facilities for existing uses in the same building as a result of this development proposal. Firstly, the frequency of servicing will increase; secondly it will not be controlled by any measures under this application; thirdly, there will not be adequate refuse storage provision and, fourthly, the modifications proposed within the finite spatial limits of the new hotel operation on Adeline Place will make servicing of VQ impossible, except from Great Russell Street.

in our representation dated 15 November 2015, we have already demonstrated that servicing of the proposed hotel is also unviable from the space identified on Adeline Place.

The applicant's transportation consultant has argued *'there is no policy requirement for a cumulative assessment to be undertaken for the proposed development'*. They have also commented *'Conditions attached to the original YMCA use should not be a material consideration and every application should be judged on its merits.'* That every application is judged on its merits does not abrogate the requirement under the NPPF (Paragraph 64) to understand the context of a development and consider the wider opportunities for improving the character and quality of an area and the way that it functions.

Furthermore, in dismissing the Association's comments as irrelevant and invalid, the applicant's transportation consultants have commented: *'The West End Project has been considered and this is set out in paragraph 3.1.2.4 – 3.1.2.7 of the Transport Statement with relevant plans included in Appendix B... Having reviewed the West End Project plans, no bus stand appears to be proposed near the site's entrance.'*

The photograph shows the bus stand that is included in drawings of the West End Proposal approved by Cabinet in January 2015 and which was implemented alongside the proposed hotel's Great Russell Street entrance on 22 November



2015. This will prevent the only other option for servicing VQ from Great Russell Street, thus rendering it functionally unviable in transportation terms.

These significant omissions by the applicant's team further undermine the credibility of the application and the information submitted with it to justify technical aspects of the proposal. To determine the application without these matters having been properly considered and resolved would risk the decision being overturned on judicial review.

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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