



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

6 December 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 not substantially varied the design proposal but is seeking to address the reasons for refusal given in the previous application (2013/5075/P) - to address a deficiency in the lack of sufficient technical support for the proposal. The current application is based on the submission of professional opinion to demonstrate that all the past reasons for refusal can be met, albeit with significant monitoring by local residents and/or the Council, and that all the objections can be overcome.

We are, as our summary statement indicated, particularly concerned that the proposal represents an intensification or 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 without a significant and inappropriate degree of monitoring control. It is difficult to quantify over-development from first principles and the approach we have taken is to seek expert professional reviews of the supplementary information accompanying the application and to assess whether it is sufficiently robust to demonstrate that the proposal can be delivered without unmanageable, harmful impacts. Our own commissioned review of this information concluded that it cannot.

Land use

The original Central YMCA building was completed in 1912; it replaced the three YMCA centres in Aldersgate Street, Cornhill and Exeter Hall in the Strand. The building, though smaller than what is there is now, was nevertheless monumental, and the public parts were rather grand, though the gym in the basement and the 240 rooms upstairs were, at best, utilitarian.

By the 1960s, the grandeur was pretty faded; World War II bomb damage had only partly been repaired, and the limited opportunities to extend and develop the building had all been exhausted. The 60's was a decade in which it was fashionable to tear old things down and start again; for the first time, it was possible to contemplate the demolition of the (at the time, much loved) 1912 building. But the real impetus came from the realisation in the YMCA movement that it had to adapt to meet changes in society.

Apart from the 60's fashion for rebuilding, the old building was not adapted to the new use because it was inflexible. It was an early reinforced concrete structure with Portland stone cladding, and had been almost ridiculously over-engineered. The decision was taken that it had to go and its replacement was purpose-built as a 650-room hostel, sports club and car park for the YMCA to a design in the brutalist style by Elsworth Sykes Partnership. It was completed in 1977.

(See: <http://postwarbuildings.com/buildings/london-central-ymca>)

In 1995 the YMCA sold its building to the St Giles Hotel Group whilst retaining the sports club for their own use. The St Giles Hotel has sought to commercially exploit their asset to the full and have implemented a continuous programme of additions to the building since taking ownership. Additional floors have progressively been added to Towers A, B and C (applications PS9604216, PSX0105217 and 2003/2959/P) and planning permission has been granted to infill the Bedford Avenue elevation between Towers A and B (2008/3002/P).

In addition, there was a recent and controversial proposal to develop even more additional hotel accommodation in the airspace above the St Giles Hotel, application 2011/5546/P, which was refused. A planning strategy that utilises separate applications to incrementally intensify development on the same land to the extent that impacts are so great as to be unmanageable is a material consideration and we believe no application should be determined in isolation without consideration of recent planning history and the cumulative effect of development.

If, on first acquiring the building from the YMCA, a planning application had been made for additions and extensions to increase the number of bedrooms from 670 at that time to the currently proposed 886, without addressing the impacts of such intensification in use, it would have been considered blatant over-development of the site and refused.

The proposed hotel may essentially be budget accommodation and, as such, it may be argued as a fitting replacement for the facilities that the YMCA once offered before they sold to the St Giles Hotel Group. However it is not presented as such and it is ironic that in justification for recent planning applications the St Giles Hotel, and independent trade reviews, have argued that there are too many small rooms and there is a need to redress the balance in new accommodation. This proposal is commercially driven by an offshore company on behalf of Criterion Capital Limited. Their web site describes Criterion Capital's business as "Managing and developing cash-flow driven, commercial real estate in London". Their portfolio includes not only what they term the 'YMCA building' but also several other major buildings around Piccadilly Circus and in Leicester Square.

Although Criterion Capital are developing a 'pod' hotel in the Trocadero and windowless Yotels exists at Heathrow and Gatwick, we do not believe that there is an underground hotel existing anywhere else in the UK so this could be breaking new ground in London and establishing a planning precedent for the reuse of car parks elsewhere. As to the intended market, it could be backpackers or night clubbers but its proximity to the West End's late night entertainment industry and London's foremost street market for Class A drugs are concerns and it seems reasonable to assume that it will operate on a 24/7 hourly room rental basis.

The original 1977 YMCA 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 along with the hostel, sports club and, as it was part funded by Camden Council, an element of what we now know as affordable housing. Since the building's acquisition by the St Giles Hotel Group there has been a gradual shift towards a single use hotel development. Camden's tenants have been cleared out and offices (see PSX 0004332), shop units and restaurants closed. It is concerning that an internal



wall which, until recently, separated the hotel from the YMCA Club, has now been opened so that the sports club becomes a facility for hotel guests and effectively, in terms of Use Class, ancillary to the hotel use. All of this is indicative of a gradual change from a mixed-use to a single use site, contrary to the core planning principles described in the NPPF (paragraph 17) and policies CS1 and DP1 of Camden's Local Development Framework.

Again, if on acquiring the building from the YMCA, a comprehensive planning application had been made by the St Giles Hotel for all these changes, without addressing the impacts of such intensification in use, it would have been considered over-development of the site and refused.

We note that this is not the first proposal to convert the basements to a more commercially beneficial use. The nightclub 'RAW' operated from the car park on an uncertain basis for a limited period and, in July/August 2001, there was a formal proposal for its use as a large capacity nightclub that was refused a license. In 2002, a similar proposal for change of use to a hostel (PSX0105180) was withdrawn. For those uses, with an active street drugs market linked to the late-night entertainment industry, the prevention of crime and disorder, security, public safety and public nuisance are issues that were as relevant then as they are now.

Drug dealing is currently taking place on Dyott Street and Bainbridge Street, very close to the application site. Faced with such difficulties. In recent years the entrance to the car park has been gated. The proposal will exacerbate opportunities for crime and anti-social behavior and we noted in our representation dated 22 November that the crime impact assessment that recently accompanied the application does not address this serious issue.

Intensification of use

In the Planning Statement accompanying the application, the applicant's planning consultant, GVA, makes reference to pre-application advice received from the Council's planning officer in a letter dated 18 March 2015. In GVA's description of the site and its surroundings, they totally ignore the presence of existing residential uses on Adeline Place and Great Russell Street, only noting that *'The site is surrounded by hotels, offices and small retail developments, with major retail on Tottenham Court Road.'*

GVA goes on to say: *'the principle of a hotel in this location has previously been agreed with the Council'*. In paragraph 5.11 of their statement, reference is made to the pre-application response (appendix 3) and they quote seven reasons why the Council has agreed in principal. We can find no such reference in the re-application response dated 18 March 2015 (ref. 2015/1063/PRE). This is factually misleading and encourages consultees to believe that the proposal already has the Council's support.

What the Council's letter referred to states is: *'As per the previous application, the principle of the change of use is considered to be acceptable. The primary consideration is whether the proposal overcomes the reasons for refusal of the previous application. In addition, several additional concerns arise due to the proposed increased capacity of the hotel, namely: Amenity of Neighbouring Properties, Standard of Accommodation, Transport, and Waste.'* It then notes that *'the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Control section or to the Council's formal decision.'*

So it is not agreed with the Council. It is an opinion of an Officer who has since left the Council and who, at pre-application stage, was not aware of the information that has arisen through the consultation process and of representations that have since been made that would require this opinion to be revised.

The principle of a hotel use being acceptable in this location is drawn from the Officer's delegated report (ref. 2013/5075/P). While we do not disagree with hotel use being suitable in this location - the St Giles Hotel already exists - the key issue is how much. The reasons given by the Officer follow with our comments on each.

a) The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The proposal would help to achieve this goal.

BA comment - The London Plan qualifies this by going on to say in Policy 4.5 - London's Visitor

Infrastructure, Strategic - that *'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.'* We and other consultees have demonstrated that there is already an existing concentration of hotel use in the area and that recent intensification of this use on the application site has already compromised local amenity and the balance of local land uses to the extent that the impact of that use is already unmanageable. This is not a context to propose an even greater level of intensification. The London Plan did not intend all 40,000 additional hotel bedrooms to be in Bloomsbury nor that they should all be on the application site. There is a finite development capacity to any land and this needs to be recognised.

b) Local Planning Policy, including CS1 'Distribution of Growth', DP14 'Tourism Development and Visitor Accommodation' and FAAP Principle 8 identify the Tottenham Court Road area as a suitable place for hotel accommodation.

BA comment - Principle 8 of The Fitzrovia Area Action Plan states: *'This Plan's objectives include guiding commercial uses to the most appropriate locations. The Tottenham Court Road and Euston Growth Areas and the Central London Frontage on Tottenham Court Road and New Oxford Street represent the best opportunities to provide visitor accommodation without harm to residential communities or the balance of uses in the area. Tottenham Court Road and Euston Growth Areas will provide direct access to long-distance public transport services. All three areas also provide easy access to shops and services for visitors in the form of the West End's international shopping offer and cluster of nighttime activities, Tottenham Court Road's specialist shops and High Street multiples, and the planned provision for retail growth at Euston. For the purposes of Principle 8, large scale development will generally be considered to be development with floorspace of over 2,500 sq m. Development of visitor accommodation may be acceptable in other parts of Fitzrovia, but any proposal should be at an appropriate scale and character for the area in which it is situated, and will be assessed having regard to the full range of its impacts and the concerns identified by Camden's Core Strategy and Development Policies, including impact on residential amenity.'*

The Fitzrovia Area Action Plan goes on to expand on the impact of development on residential amenity in Principle 9: *'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'.*

This proposal is for a floorspace of 6,623 sqm so Principle 8 and Principle 9 apply. We agree that the frontage to Tottenham Court Road provides an opportunity to provide visitor accommodation without harm to residential communities. However the external street presence of this proposal that has greatest impact is located on Adeline Place, directly opposite an existing residential community in the Bloomsbury Conservation Area, which is outside the Central London Frontage on Tottenham Court Road. Therefore a more important criterion than the proximity to Tottenham Court Road is the scale and character for the area in which the proposal is situated, and its impacts identified in local policies including residential amenity and heritage.

c) Facilities for servicing and pick up should be sited and designed to minimise any adverse impacts. Given the high public transport accessibility of the area and the severe limitations on providing on-site pick up and set down, the Council will expect visitor accommodation to be accessed primarily by public transport and will seek to use planning conditions and/ or legal agreements to secure transport management plans. The Council will expect transport management plans to control pick-up and set-down by taxis and coaches.

BA comment - The Fitzrovia Area Action Plan goes on to say: *'The residential density and fine grained character of many parts of Fitzrovia, including areas to the rear of the Central London Frontage, makes them vulnerable to harm from access arrangements, particularly access by taxis and coaches'.* Adeline Place is an 'area to the rear' and is particularly vulnerable to harm from access arrangements. Indeed, existing vehicles servicing the St Giles Hotel and its A3 tenants, the Dominion Theatre and École Jeannine Manuel have already been shown to be the cause of unmanageable impacts. This street is proposed as the service access to the proposed hotel and will add to this impact.

The NPPF (paragraph 34) states that development should be prevented or refused on transport

grounds where residual cumulative impacts of the development are severe. However the cumulative impact of the proposal has not been considered. The applicant suggests that he has been discouraged from doing so by Council Officers which, given its importance and that it contradicts the requirements of Principle 9 of the FAAP, surprises us. Again, to ignore this totally undermines the credibility of the application and the information submitted with it to justify the technical aspects of the proposal.

Although the draft hotel management plan seeks to exclude coaches, a Principal Transport Planner in the Council has advised us that they cannot stop coaches using the streets - the public highway is open to all. The only opportunity is to introduce a weight restriction, which would be subject to public consultation, and likely to be opposed by hotel and other developments. It would also be extremely difficult to enforce. Moreover, any S106 agreement on the hotel is not applicable to the coach companies themselves, or the guests who chose to travel in that way. The hotel will not have a contract with the coach companies, which it can use to require them to use other routes. So it cannot be enforced and again undermines the credibility of the application and the information submitted with it to justify the technical aspects of the proposal.

d) The hotel would contribute to a successful and vibrant centre with a use that provides variety and choice and supports the continued growth of the sector and related employment in accordance with policies CS7 and CS8.

BA comment - The proposal would add nothing to the qualities of a vibrant centre. It would destroy an established residential enclave and, by taking away public parking, threaten existing uses. Furthermore, concentrating development in a single use would be contrary to NPPF (paragraph 17) and policies CS1 and DP1. Equally, it proposes a sterile, inactive street frontage on Adeline Place and there is nothing vibrant about that other than the plant and ventilation equipment that it encloses.

e) The proposal would result in additional employment opportunities for local residents. In keeping with the requirements of policy CS8, employment training strategy, apprenticeships, and local labour and procurement would be secured via legal agreement if the application were to be recommended for approval.

BA comment - The application suggests that the proposal will result in 24 full-time employees. 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, not living locally. There may, of course, be wider economic benefits.

f) The NPPF seeks to promote a strong, responsive and competitive economy and as such the economic impact on existing hotels in the area is not considered to be relevant.

BA comment - As we have said previously, 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 located in the same building. The proposal will place too large a share of the market in a single location to the detriment of the prosperity of small local businesses that presently provide budget accommodation elsewhere in Bloomsbury. Again, The London Plan 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 will compromise the balance of local land uses and have a deleterious economic impact.

g) A residential use, which would be the only other priority land use in this location, would not be acceptable underground.

BA comment - Agreed but there are other uses that might be considered such as studios or workshops (as the basement of the former NCP car park on Cleveland Street), archival storage, cinema, theatre, museum or sports and recreation facilities for nearby schools. The opportunity to use the space to provide facilities for Crossrail or for the British Museum could also be explored.

h) If the Council were to consider approval of the scheme an appropriately worded condition would be recommended requiring the hotel to be retained as a single planning unit and for the purpose of short-term, temporary accommodation only.

BA comment - Agreed but it would need to be more specific than this to preclude use as a hostel or ancillary use such as a bar or nightclub.

The Officer's delegated report goes on to explain that the proposal is not considered to represent overdevelopment or constitute an unacceptable intensification of use. The reasons given by the Officer follow with our comments on each.

a) The London CAZ is an area intended to be a focus for growth and the proposal seeks to make full and efficient use of the site including higher density development in accordance with Camden policy CS1 as well as London Plan 2011 policy 2.13 'Opportunity Areas and Intensification Areas'.

BA comment - The distinction needs to be drawn between 'full and efficient use' and over use. See our comments on 'unintelligent densities' below. Two separate hotels in different management regimes will inevitably result in duplication of facilities and servicing plant and hence inefficiencies.

b) In respect to concern about 24 hour operations, the proposal is located in the London CAZ and as such is within the most appropriate area for such uses. Furthermore, while hotels are 'open' at all hours of the day, they are comparable to a residential use in that this amounts to nothing more than people coming and going as they please. There is no space within the hotel for ancillary functions such as entertainment, bars, restaurants, conferences, weddings or the like, and as such the fact that patrons can come and go 24 hours a day is not considered likely to result in any material amenity impacts on adjoining or nearby properties that cannot be managed by a hotel management plan.

BA comment - The servicing needs of a hotel are far greater than a residential development and occur at different times of the day as we have demonstrated in our comments on the Transport Statement accompanying the application. Furthermore, the officer's conclusion takes no account of the cumulative effect of a concentration of the same use on one site under different management regimes. Nor does it take account of the impact of intensification on functions such as entertainment, bars, restaurants, conferences that are ancillary to the established use in the same building.

c) The proposal is not considered to result in an unacceptable precedent as the proposal is unique and notwithstanding, all development is assessed on its own merits.

BA comment – We do not agree. This is a development model that has never been tried and tested in Central London and which neither the London Plan, local planning policy or planning policy guidance has anticipated. A favourable decision may set a strategic planning precedent and, if one is successful, more will follow in other parts of Central London. This is not the only basement car park in the area and there are many more in the West End, including one nearby in Bloomsbury Square that is in the Council's ownership. See below.

These, of course, are not the only issues to be considered with intensification. Along with intensification of development comes intensification of vehicle movements, intensification of servicing and refuse collection, intensification of noise, environmental degradation and safety issues, all of which have been elaborated upon in our previous comments.

Unintelligent densities

In July 2015 we met with Colin Wilson of the GLA who manages the team responsible for dealing with referred strategic planning applications and the production of the Mayor's Opportunity Area Planning Frameworks at the GLA. He is a consultee on this application. He was speaking about 'intelligent densities' at New London Architecture on Store Street, just around the corner from the application site. We spoke about density with reference to this proposal and an analogy was drawn with low value uses such as tyre fitting centres, where land values catalyse new uses to take their place and fill holes in the city, and that there must be a point in the process of intensification of use "where it starts to harm all the things we enjoy" (Colin's words, not mine). Well, that point may have been reached with the former YMCA site on Tottenham Court Road as it grows from the 240 rooms to the 886 rooms proposed now, with no provision whatsoever for any additional urban glue to make it work.

Yes, it is for Camden to assess the local impact of accommodating the Mayor's requirement for 40,000 new hotel beds under the site of what is now the St Giles Hotel by 2031, particularly when their life support system depends on 'fresh' air intake and extraction of a scale only seen on the underground rail network and that operates 24-hours a day, 7 days a week. It is for them to assess this against the criteria by which over development for hotel use in an area already saturated by hotels should be judged. However a PTAL of 4+, 24-hour tube services, Crossrail and the Mayor's well publicised

opinion that we now live in a 24-hour city are not helpful in managing erosion of the interface between two distinctly different areas of urban development: the Bloomsbury Conservation Area and the commercial corridor of Tottenham Court Road. It does start to harm all the things we enjoy in Bloomsbury to become a narrative of 'unintelligent densities'.

Unintelligent densities and market forces do not shape place; they destroy place. Hard on the heels of Criterion Capital's application to erect a 40m long, two-storey high, digital advertising screen on the Tottenham Court Road frontage to the St Giles Hotel, the proposed change of use of two levels of the car park deep beneath into a 166-bed space underground, Trocadero-like, pod hotel is clearly an attempt to reshape St Giles Circus into another Piccadilly Circus. On Appeal against a refusal on 18 November 2015, J. Flack of The Planning Inspectorate acknowledged that they are very different spaces: Tottenham Court Road is not Piccadilly Circus. The Inspector states in his decision:

'In the vicinity of the appeal building, Tottenham Court Road has a busy and largely commercial character. However, as interested persons have observed, it is not equivalent to Piccadilly Circus, having an appreciably more restrained character... My attention is also drawn to the site's proximity to conservation areas, and the effect on their setting is a matter of importance to my assessment... the Bloomsbury Conservation area extends along the section of Tottenham Court Road between the appeal building and St Giles' Circus and wraps around the appeal building's Great Russell Street and Adeline Place facades, together with part of its Bedford Avenue façade. The Tottenham Court road frontage of the conservation area includes some impressive and formally detailed older buildings adjacent to the appeal building. The Council identifies these as Positive Buildings, and below them is the imposing listed Dominion Theatre... Noting the policies cited in the evidence before me, policy CS5 of the Core Strategy is a general strategic policy of limited direct relevance. Policies CS7 and CS9 identify Tottenham Court Road as a growth area and an extension to the west end, but for the reasons I have given, the proposed advertisement would be contrary to policy CS14 and to policies DP24 and DP25 of the Development Policies given their overall objectives of securing high standards of design and conserving Camden's heritage... I have concluded above that the proposed advertisement would be unacceptably harmful to amenity. This is, on its own, sufficient to cause me to dismiss the appeal...' (Appeal Ref: APP/X5210/Z/15/3134986).

However, it is our view that there are some wider impacts that also need to be addressed. Is it correct that reshaping of the public realm in the no-man's land straddling the boundary between two distinctly different local authorities into another 24/7 entertainment area should be entirely driven by market forces? If it is, then who is going to assess the wider economic impact on those parts of London that have become synonymous with budget hotels, such as Earls Court, Paddington and Bloomsbury.

The proposed hotel is at the edge of Bloomsbury at a point where it collides abruptly and noisily with the fringes of the West End. The concept seems the wrong way round: it presents smart 'front of house' image towards commercial Tottenham Court Road (designated as Central London Frontage but only for a short distance along Great Russell Street) and presents its scruffy, noisy 'back of house' activities towards residential Bloomsbury. If, as the NPPF and Policy CS1 advocates, you accept that a successful centre is mixed use, this adds nothing to the qualities of a vibrant centre. Indeed, it would detract. 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.

As we mentioned in our representation dated 22 November, 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.

The applicant is promoting a 24/7 approach to this proposal and there are already several establishments in the area that are operating on this basis, including the St Giles Hotel itself together with some clubs, bars and cafés in the streets that surround it. Residents' experience, as evidenced by enforcement action that the Council has already taken against Hudson's House bar at the St Giles Hotel, show that these criteria are not currently being met and that further intensification of development on this land is inappropriate.

It is apparent that the Officer has little knowledge of the area surrounding the proposed development. There are 142 homes in Bedford Court Mansions, with frontages to Adeline Place and Bedford Avenue that are approximately 10 metres away from the proposed development. There are also

households in 5 and 13-14 Great Russell Street that are a similar distance away as are those in 40 Bedford Square and 9 Bedford Avenue. 5 Great Russell Street is immediately opposite the proposed hotel entrance.

The proposal may perhaps be a sound commercial strategy, particularly if local residents' concerns are ignored, but not one to be implemented in this location. It places too much development in a single use class to no economic benefit.

Strategic planning precedent

This proposed change of use is unlikely to be on a par with the five star, 200-room, subterranean hotel proposed (and subsequently refused planning permission) in London's Green Belt at Hersham Golf Club in Surrey. It is a development model that has never been tried and tested in Central London and which neither the London Plan, local planning policy or planning guidance has anticipated. A favourable decision may set a planning precedent; if one is successful, more will follow elsewhere. This is not the only basement car park in the area and there are many more in the West End.

The proposal may or may not be commercially successful. Once a change of use to hotel (Use Class C1) is granted it is likely that the type of 'hotel' operation could easily change in response to market demand to cater for different users and with differing impacts. If it doesn't work, with a precedent already having been set, and in the absence of any clear strategic policy guidance, planning justification could easily be made for a similar use or indeed, other uses 'ancillary to the hotel use' that do not require planning permission such as a club or bar. A back-packer hostel or a hostel for the homeless and socially excluded could easily be envisaged – a change that may or may not be appropriate but which the planning system may not be robust enough to deal with, as the recent planning history of 70-72 Guildford Street has demonstrated.

The Council's Area Action Plan for Bloomsbury and Fitzrovia includes this land within the area of the Plan. PPS12 states that Area Action Plans should be used to '*protect areas particularly sensitive to change*'. This includes addressing specific threats to the Bloomsbury Conservation Area and these are twofold: the impact of development intensification on the Tottenham Court Road and New Oxford Street corridors and the spread of the late night economy out of Soho and Covent Garden. The latter is, in part, mirrored by Policies CS7 and DP12 of the LDF.

Equally strategic is setting a precedent for the loss of car parking elsewhere along Oxford Street. Is this another area-related use like Saville Row, Denmark Street and Covent Garden Market that needs safeguarding from market forces or will the NCPs under Cavendish Square and in Portman Square be next in line? We will leave these thoughts with you for further consideration.

The design proposal

The applicant has since revised the supplementary and non-binding information submitted with the original application but has still not materially varied the design proposal. These submissions were made available for comment between 28 September and 6 November 2015. They are all in response to comments made on the original submission, much of it a skilful play on words and graphic images to re-wrap what is essentially the same design proposal that was refused planning permission in 2013. Indeed, one of the submissions concluded that '*there are no valid points being raised by the Bloomsbury Association... and therefore, we do not feel it appropriate to give too much weight to the points raised.*' In contradiction, the applicant's community engagement report concludes that '*The applicant has attempted at every stage of the application to accommodate the concerns and requests of the local stakeholders.*'

In our representations dated 15, 22 and 29 November 2015 our architects have reviewed the functional and operational aspects of the area at street level on Adeline Place, on which the entire viability of the proposed change of use relies. This is a space of finite dimensions, with a sensitive interface with the Bloomsbury Conservation Area and with major constraints to do with access, escape, pedestrian safety and existing structural and building services systems. We have sought professional advice from other disciplines and have concluded that there are fundamental flaws in the proposed ventilation strategy, in the capacity and access to the refuse store, in the means of access and refuse storage provision for the cafe bar and restaurant ancillary to the established hotel use, in means of escape in case of fire and in the provision for firefighting access. These are

serious deficiencies in the concept design that have not been resolved in the revised submission. Indeed they may not be resolvable within the set of constraints that this part of the building presents. They do not convince us that the design proposal is achievable nor that it meets the exacting standards required under NPPF paragraph 64 and by the Council under Policies CS14 and DP24, which requires all developments, including alterations, to existing buildings to be of the highest standard of design.

Section 7 of the NPPF has regard to good design. In particular, paragraph 56 highlights that *'the government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'* We believe that to ignore this totally undermines the credibility of the application and the information submitted with it to justify the technical aspects of the proposal, which are all based on this being a functionally resolved aspect of the proposal. To imply that it is and to use the architectural design as a basis for other design disciplines to demonstrate the viability of structural and building services systems in what, ultimately, will have to be a highly coordinated multi-disciplinary design exercise is misleading to the extreme.

The Fitzrovia Area Action Plan also requires development proposals to be viable. It states: *'The NPPF indicates that attention to viability and costs is required during plan-making and decision-taking. Viability should be considered having regard to the cumulative impact of all existing and proposed policy documents and standards, including national requirements... The Council considers viability to be a key factor in assessing planning proposals in Fitzrovia and across the borough. In the Plan area, the Council will continue to have full regard to viability as a material consideration in planning decisions, and will also apply the specific viability provisions in the NPPF, the London Plan, Camden Core Strategy 2010-2025 and Camden Development Policies 2010.'*

We remain, as our summary statement indicated, particularly concerned that the proposal represents an over development of the site for a single use - hotel - to the extent that it is unviable and that its cumulative impacts on and off-site cannot be shown to be manageable without unmanageable harmful environmental impact.

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:
Keir Starmer, MP
Andrew Dismore, GLA
Colin Wilson, 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