

Basement hotel 'pods' – a density too far for London?

Roger Wilson
argues the case
for the
Bloomsbury
campaign
against a
troglodyte hotel
development

For those who want to travel cheaply and aren't too concerned about a window view, an inside cabin on board ship can be an expedient, if not delightful, experience. It may not matter too much that waking up in the morning you don't know whether to put on a sweater or a T-shirt. What the hell, the cabin didn't wreck the holiday budget and a ship's a ship isn't it! Some may feel the same way about a city break; so long as one can get there and can see the sights, what does it matter if the room doesn't have a view?

You won't be in it long enough to worry. The younger generation, in particular, now seem to be prepared to forego a view if the room enables a trip that would otherwise be beyond their limited budgets. The latest London offering goes a step further with 'windowless' rooms – windowless because they are underground.

Criterion Capital are offering that prospect, or lack if it, in their latest proposal for replacing the underground car park at Tottenham Court Road's St Giles Hotel, formerly the YMCA: two floors of 'pod' accommodation, possibly rented by the hour, as happens at Heathrow and Gatwick, with everything artificial – lights and air included. "Once you take the window out you can just pack them in," Michael Hughes of Criterion Capital is reported as saying in *The Economist*.

The transient occupants of underground accommodation may be able to come to terms with this, but not so the surrounding residents of Bloomsbury and Fitzrovia. While servicing a ship's inner cabins may be neither difficult nor would it affect other people, the same cannot be said for a Central London development of 166 underground pods. Naturally, or in this case, unnaturally, air-conditioning is essential, 24/7, 365 days a year. The air-con equipment can, for the most part find a home anywhere in the building - the incoming air supply and extraction cannot.

It must have an external face, and herein lies the problem. Since the St Giles Hotel occupies the upper floors, the only place available to locate the public face of the air supply/extraction is at street level facing Adeline Place. This will provide an unpleasant experience for pedestrians at street level, and a constant noise source for the residents of Bedford Court Mansions directly opposite. That the air intake and extract are within nudging distance of each other is another health concern.

High density habitation within inner cities is encouraged by government because it eases the pressure on greenfield sites and the open countryside. However, the pressure on inner city residents has recently become significantly more intense with noise, disturbance and poor air quality high on the list of concerns. Increased noise levels leave residents with sleepless nights and early morning disturbance – no alarm clocks needed here. The air quality in Tottenham Court Road and Gower

Street has been measured as the worst in the country.

The concept of development having a cumulative impact seems to have by-passed Council thinking. Peter's Principle when applied in the planning context has now metamorphosed Nicholas Taylor's seminal 'Village in the City' into the planner's nightmare: a community under stress.

One would hope that council planners would be aware of these issues and prevent development that causes them. Wishful thinking, I'm afraid, because other pressures are being brought to bear. According to London's Mayor, Boris Johnson, London is a 24/7 city that needs 40,000 more hotel rooms. It doesn't have 'communities any longer; it has 'visitors' who contribute nothing to society but everything to the economy. Their only hope is to 'condition' planning permissions so that unwholesome environments can be avoided. This, at least, was the government's intention when introducing conditional planning permission. The reality, however, is somewhat different.

Having tested planning conditions at appeal and watched planning committees in action, there is an undeniable trend towards granting permission with a list of conditions running to several pages, and this is often after Section 106 agreements have been given a good airing. On the one hand, council planning committees have little regard for the impossibly onerous workload that the operation of some conditions place on their delegated officers; while on the other hand, Section 106 agreements are too frequently being used when conditions might be more suitable, if indeed, they are required at all. Councils, under their officer's guidance, should review their conditions policy to make sure that they fulfil the original six tests: Necessity, related to planning, related to the development in question, enforceability, precision and reasonableness in all other respects. It seems normal practice for planning officers to throw in their 'wish-list' of conditions, some of which would not meet these tests - A 'wish' does not mean it's necessary!

So back to the underground bunker, with planning permission granted and an initially satisfactory but unsustainable air-con in place surely everything is hunky-dory? Not necessarily. Machinery needs regular maintenance, and without it, parts wear causing excess noise and poor performance. How does a council control over-noisy machinery? If you thought they had a monitoring service, think again. It relies entirely on residents' complaining more loudly than the machinery, and often! - until the council officers get fed up with hearing about it! Is it reasonable or practical to expect the Council to monitor a situation for compliance?

Alternatively, is it reasonable to expect residents or members of the public to recognize non-compliance of e.g. noise or air quality? Even then, councils are not obliged to enforce plan-

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ning regulations. They will pick off the easy hits, and leave the more difficult ones to fester. For government planning policy, this is the law of unintended consequences. It is to be considered carefully alongside that other, often ignored, maxim of government policy that there is a danger of relying on planning conditions and obligations to make the unacceptable acceptable, especially over environmental and intrusion matters.

Then consider waste collections. This is a necessary convenience for residents, organised by the Council, but for businesses it's a commercial trade collection, often once a day. Again, lorry noise and disturbance goes with the territory. The level of control councils can effectively give is limited, and when business bins are full, the surplus, and there often is a surplus, ends up on the street or in street-side community containers. The same deficiencies in the Council's 'control' regime applies to waste storage and collections. Commercial pressures ensure that space allocated for waste storage is better employed making money. All too often councils take a relaxed view of standards – anything for an easy life.

We have to bear in mind that there are already three hotels clustered around the junction of Great Russell Street and Adeline Place, all within a few metres of each other. Criterion's underground bunker will make it four: that means four air-conditioning plants, four separate vehicle servicing regimes, four uncoordinated refuse pick-ups and I have lost count of the number of restaurants, bars and café franchises ancillary to the hotel uses, each with their own servicing and refuse collection, and none of which require planning permission. There is the concept of cumulative impact that is normally brought into play when assessing environmental issues. Astonishingly, Council officers have declined to consider it here, an approach that is fundamentally flawed and risks misleading its Members.

The area around Bedford Square was once an attractive residential enclave within the Bloomsbury Conservation Area, but changes have been arriving by the lorry load that the recent Fitzrovia Area Action Plan barely struggles to contain. The threat of another incoming development is 'code red'. Andrew Dismore, our London Assembly Member shares this concern and, in objecting to the proposal says "The cumulative over-development of the site for single hotel use will further change the fabric of a delicately balanced and mixed use area. This is a part of London under intense pressure to develop beyond all recognition of what makes it a desirable location in the first place." Keir Starmer, MP, also hopes "that planning officers will seriously take all these factors into consideration in their decision making." but Council's planners seem oblivious to the dangers. If the underground bunker is allowed, I foresee a war of attrition between the residents, hotel operator and Camden Council. ■

Unintelligent densities

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 60s 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.

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 and planning permission has been granted to infill the Bedford Avenue elevation between Towers A and B.

In addition, there was a recent and controversial proposal to develop even more additional hotel accommodation in the airspace above the St Giles Hotel, which was refused permission. A planning strategy that uses 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. Although



Unintelligent densities and market forces do not shape place; they destroy place, argues Stephen Heath

Stephen Heath is an Architect and Urban Designer and member of the Bloomsbury Association who has lived in the area for over 40 years

Criterion Capital were developing a 'pod' style hotel in the Trocadero, which has since been abandoned, 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 is possible that it will operate on a 24/7 hourly room rental basis, as happens at Heathrow and Gatwick.

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 left and offices, shop units and restaurants closed. 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.

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 6+, 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, The Planning Inspectorate acknowledged that they are very different spaces: Tottenham Court Road is not Piccadilly Circus.

However, it is the 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.

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. 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.

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. ■

BELOW:
The YMCA 1967 building taken from the same viewpoint as current view on previous page



PLANNING APPLICATION:
112A Great Russell Street, London, WC1B 3NP, 2015/3605/P: 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 openings, walls and fascia on ground floor elevations on Great Russell Street and Adeline Place. A decision is due to be made on Thursday 14 January 2016.