

Comments Form

Name... STEVE JOHNSON

Address... ST. GILES HOTEL, BEDFORD AVE, LONDON WC1B 3GH



Planning application number... 2015/3605/P

Planning application address... 112A GREAT RUSSELL ST, LONDON WC1B 3NP

- I support the application (please state reasons below)
- I object to the application (please state reasons below)

Your comments

Please see attached letter

Please continue on extra sheets if you wish

Mr Raymond Young
London Borough of Camden
Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 8ND

Thursday, 29 October 2015

Dear Sir/Madam

With reference with the application noted below, please see our comments.

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

We object to this revised development proposal for the reasons stated below. These should be read together with our letter to the Council dated 14 August 2015.

The proposed change of use represents over development of our site for hotel use to the extent that we feel it can no longer be effectively managed – and that is what we understand to be what differentiates appropriate development from over-development, where it results in more damage than benefit. The applicant has attempted to explain how concerns expressed on this and previous applications, that were either refused or withdrawn, have now been overcome. It does not resolve the very real technical issues to do with air-conditioning, ventilation and smoke exhaust systems, nor with vehicle servicing, all of which are needed to make such underground accommodation work, and all of which bring cumulative impacts in terms of noise and air quality that need to be managed. This revised proposal does nothing to convince us that these impacts can be managed, and we are in the business of managing hotels.

We have reviewed the revised documents and we are not convinced they are sufficiently robust to demonstrate that the proposed development would not give rise to harmful environmental impacts. Indeed, the revised street level plan and elevation to Adeline Place is quite awful and clearly demonstrates the applicant's lack of any understanding for the St Giles Hotel's concerns. Section 22 of the revised application form does not describe the plant, ventilation or air conditioning that is proposed to be installed, a response that we consider to be misleading and an unsound basis for the Council to determine the application.

We would like to point out in particular the following:

a) The land on Adeline place that is the subject of the application is St Giles Hotel leased land;

- b) The proposed lift blocks egress from the fire escape staircase serving the St Giles Hotel's accommodation above;
- c) The proposed ductwork installation blocks the fire escape route from VQ's kitchen and its service access;
- d) The proposed double door on Adeline Place would require access across our land, which would not be granted;
- e) The proposed bicycle parking is on St Giles Hotel's land, which is used by our staff as a break-out area and would also not be granted.

All of which leads us to believe that, for the proposal to be viable, the applicant would need to provide a new or altered access from the public highway that avoids our land, when Section 6 of the revised application form denies this.

In the revised application, we also note that the applicant has changed from Mr Mark Cooper, of Coventry Street, to Central London Investments of Douglas, Isle of Man. The ownership declaration, Certificate B, accompanying the revised application, states that Central London Investments Limited, has given requisite notice to all parties who have an interest in the land or buildings to which the application relates. We have received no such notification.

The Certificate makes reference to an attached schedule. The document uploaded to the Council's website, 'Revised Notice 01.10.15', certifies notice having only been served on Quick Parking of 112 Great Russell Street. It appears that the new applicant has not submitted certification of notice having been served on all the other parties with an interest in the land. Article 13 of the Town and Country Planning (Development Management Procedure) Order 2015 requires notice to be served on anyone who, 21 days before the date of the application, has an interest in the land or building to which the application relates. This does not appear to have been done we therefore regard the application as being invalid.

Yours faithfully



Steve Johnson

St Giles Hotel