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LB Camden Council
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DAVID COOPER & Co

20th April 2020

Re: PROPOSED DEVELOPMENT AT 112A GREAT RUSSELL STREET, LONDON, WC1B 3NP

Non-Material Amendment Application (Reference: 2020/1438/P) in the context of the planning permission for "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" (Reference: 2015/3605/P).

Dear Sirs,

We are writing in on behalf of St Giles Hotel Ltd, the leaseholder of 112A Great Russell Street, WC1B 3NP, (Title number NGL757073) to register our vehement objections to the aforementioned application.

We are objecting on the following grounds:

1. Increase in the number of hotel rooms – The proposed increase from 166 to 208 is ill conceived. We objected to the original recently consented scheme and stand by that objection. We were highly surprised that Camden allowed this anomalous application to get consent; given the poor quality of amenity on offer in terms of living conditions and natural light on offer. No doubt this was a more commercially attractive use for the applicant, but it does not detract from its inherent failings as an application. Planning policy is clear on this and this has been reflected in the recent changes in the NPPF, in particular with regard to proposed design, whereby the government acknowledges the need to avoid the slums of the future, by not allowing some developers to provide sub-standard living accommodation. The governments aims are to improve amenity space for all C3 usage; not least for those in the vulnerable categories, of which a deep basement converted carpark hotel/hostel would fit. Suffice to say, increasing the density of this proposal is strongly opposed. It will exacerbate an already sub-standard planning consent, to one which no doubt will use greater utilities to service, of which we have as you can see no further detailed information about.
2. Design and layout of the 'Hotel entrance' - No information has been provided to us as to how this so called "Hotel Entrance" will work? Ravencroft Investments Inc., the virtual freeholder own the fire exit portion of land on Great Russell Street. Although

there is right of access over that space, we hold the right to approve any and all design which will impact our demise, as there may be implications to our asset that we do not know what if any detriment may occur, due to this proposed amendment. We have asked the applicant for these details, but to date, to no avail. The applicant has consent for access here, but they need our consent on the design to implement this consent, again they have not provided this information.

3. Car park ramp and Adeline Place – Little information has been provided on the proposed full-time use of the car park ramps on Adeline Place, nor the amount of space which the bicycle storage will consume. Ravencroft Investments Inc owns the virtual freehold of land on half of the Adeline Place pavement between the ramp entrance and exit, and the proposed use for the ramps could impact our interest. There is also an existing exhaust fan that vents out onto the car park ramp. Clearly this requires good ventilation to external air and the proposed plans seem to cover up front façade on Adeline Place which will obstruct this airflow.
4. Fresh air supply to the underground – No information forthcoming from the applicant. How do they intend to supply fresh air to their development which is a condition of the original planning consent? Do they propose to use our M&E equipment for the air supply? If so, the potential sharing of air supply, will have an impact on our current air handling plants, and approval needs to be sought for this.
5. Hot and Cold-water supply - to the underground hotel. No information forthcoming from the applicant. Do they intend to connect their supply to the existing main water? If so, this is an account that belongs to St Giles Hotel Ltd. If not, how are they going to connect to the main water supply, if not via our M&E equipment?
6. Fire Alarm System and Safety Procedures – The plan does not outline how the underground hotel would mitigate fire risks, what the system being installed is, and what the procedures will be in the event of a fire. St Giles Hotel sleeps on average 1000 in the hotel on a daily basis, and the safety of their guests, staff and property are priority. These are crucial questions that need to be addressed before any further works can continue.

Finally, we note that the application has come by way of a Section 96A application. These being for very minor no material minor amendments. This is not the proper choice for what is self-evidently a major amendment, if not a substantial change to the previous application. The choice coupled with the lack of forthcoming information to my client, would denote a willingness to conceal the true nature of the proposed application by the applicant. It is I would contend, a misuse of this section of the Planning Act. Given the substantial increase in proposed hotel rooms and the proposed removal of the existing amenity space to facilitate this increase, it is only proper that this goes back to Camden's Planning committee as a new application.

Kindly acknowledge our letter of objection by return,

