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LC Camden Council
Town Hall
5 Pancras Square
London, N1 4AG

Send by email only: planning@camden.gov.uk
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DAVID COOPER & Co 

17th March 2022

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

Variation of conditions 2 (approved plans), 3 (air quality), 6 (cycle storage), 9 (noise), 10 (drainage) and 14 (hotel bedroom number) of planning permission ref: 2015/3605/P allowed at appeal ref: APP/X5210/W/16/3147078 dated 04/10/2016, as amended by 2020/1438P dated 01/06/2020, for "Change of use of part ground floor and basement levels -4 and -5 from Car Park (sui generis) to hotel (Class C1).....

Dear Sirs,

We act for St Giles Hotel Ltd, the leaseholders of 112A Great Russell Street, WC1B 3NP (title number NGL757073).

We enclose our previous objections that we put in in relation to the previous application on the 20th of April 2020 & 4th August 2020.

1. We seriously object to the number of bedrooms being increased from 166 to 208, which has already been built.
2. We need to see a copy of the Section 106 Agreement, which has not been supplied.
3. We have not seen any impact assessment on Transport, Sustainability or Amenity terms, as referenced in your planning officer's report, so that the legal agreement requirements can be continued in a Deed of Variation.

We do not consider this application to be a minor material amendment, we consider it to be a major one and therefore it is inappropriate to do it via a Section 73 application.

This increase the scale to such an extent that in law the development is substantially different to that which has already been approved and if this is approved, we will advise our client to legally challenge this in the High Court.

The counsel's legal team who has apparently advised otherwise are incorrect, this is not a matter of professional judgment, it is a matter of the law.

The fact that the floor space does not increase, is irrelevant. The number of occupiers and the way they get to the hotel clearly does increase and therefore there is a significant effect on the amenities of my client I terms of access, noise, etc.

We urge the Planning Committee to refuse this application, to prevent further action form being necessary.

Yours sincerely

David Cooper

