

From: Sonja Secker
Sent: 14 January 2023 14:45
To: Planning Planning
Cc: Neil McDonald
Subject: OBJECT - 112A Great Russell Street, London WC1B 3NP -
Application ref: 2022/5446/P

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Dear Committee

The planning application is made under s73 of the Planning Act for approval of ‘minor amendments’ to a previous scheme approved under appeal in November 2016 (ref: 2015/3605/P and PINS ref: APP/X5210/W/16/3147078) which described a 166-room hotel at basement levels -4 & -5 at 112A Great Russell Street, London, WC1B 3NP.

That permission has been subsequently varied via a non-material amendment made under s96A of the Planning Act (LPA ref: 2020/1438/P) to exclude the reference in the description of the development to 166-rooms.

A subsequent planning application (ref: 2020/3107/P) made under s73 was refused by the Council’s Planning Committee in April 2022.

While the proposal has reduced the number of extra rooms, this is still a totally different plan from the original in a number of ways: more rooms and occupants, reduced number of lifts to one, and significant potential servicing conflict at street level on Adeline Place.

It follows that the **inappropriate use of the s73** for making such significant changes is an abuse of the process not supported by case law. The proper way to deal with such a scale of amendments is a new planning application. **For this reason alone, the application should be refused.**

Justification for a **single** lift serving 187 rooms 4 and 5 storeys below ground is flawed in both its calculation of waiting times, its reliance on a maintenance contract, which itself does not overcome the issue, and severely limited accessibility, particularly in the event of fire. **THIS IS A SIGNIFICANT SAFETY HAZARD AND MUST BE RECTIFIED**

The TPP Reports do not take into account multiple deliveries/ removals happening simultaneously. No management agreement will resolve this.

The applicant's inability to provide the original number of lifts arises from a significant error in describing and certifying the ownership/control of the land/building the subject of the initial planning application. This calls into question the validity of the original application and the subsequent appeal decision.

The scheme does not demonstrate that noise from air-handling plant can be adequately attenuated by the proposal. There is conflict between the drawings and the consultant's specification that cannot be reconciled.

Furthermore, what is built as an enclosure to the sub-station is different again because the consultant's specification has not been constructed. In practice, the required level of noise attenuation will not be met.

The use of a s106 agreement covering Hotel Management, Servicing and Transport is wholly inappropriate. It is contrary to government policy in principle by not meeting the six tests for conditions; and is likely to be an ineffectual means to manage the significant harm that will arise. For this reason alone, the application is unsafe and should be rejected.

The Fire Statement has not been submitted to or supported by the London Fire Service. There are a number of potentially dangerous situations that cannot be overcome: restricted lift accessibility, narrow corridors, some with columns in the middle of them, and a confusing contorted layout.

The alleged need for additional hotel rooms in Central London does not justify the harm that would arise from this proposal.

The conditions for which change is sought should remain in place to safeguard the public interests. **The application under s73 should be refused.**

regards,
Sonja Secker