

From: Kevin Fogarty
Sent: 17 January 2023 20:59
To: Planning Planning
Cc: Neil McDonald
Subject: 112A Great Russell Street, London WC1B 3NP - Application ref: 2022/5446/P

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I strongly object to this latest planning application.

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.

The TPP Reports do not consider multiple deliveries/ removals happening simultaneously. No management agreement will resolve this. There are additional unresolved pressures: 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 refused.

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 claimed need for additional hotel rooms in Central London does not justify the harm that would arise from this intensification of use. Local Plan policies E3 and E10 do not promote unlimited intensification of development. This proposal, by increasing the number of rooms, is a step too far in what is already overuse of the whole block for hotel use. It needs to consider the cumulative effect

of intensification of uses in other buildings and on other sites in the immediate area, all using the same public infrastructure: the St Giles Hotel and ancillary uses above, 247 Tottenham Court Road, 21 Bloomsbury Street, École Jeannine Manuel, the Dominion Theatre and the well-established use of Congress House on Great Russell Street for film production.

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

Regards

Kevin D Fogarty