

To Whom it May Concern

I strongly object to the planning application associated to 31 Betterton Street (ref 2024/3552/P) on multiple grounds. These objections accord with the National Policy, Camden Policy and London Policy and the Camden Planning Guidance: Advertisements, March 2018.

The details of the objection are provided below and are structured in the same way as the Design and Access Statement for the application.

In summary, the key reasons for the objection are the lack of consideration of the:

- historic nature of the immediate area - ventilation systems, awnings, etc do not accord with the Covent Garden's Conservation area status and they do not take into account the adjoining listed building
- residential nature of the Street - Betterton Street is almost entirely residential except for a dry cleaner. A restaurant will unduly impact the nature and character of the street
- conflict local residents will have in living close to a premises serving food and alcohol
- potential danger to residents and tourists – the pavement in front of the restaurant is little more than 4ft. When customers enter/exit the proposed restaurant pedestrians walking past will need to step off a high curb onto the street. Worst still there could be queues for eating (this can be evidenced in restaurants in more commercial parts of Covent Garden). It is likely the restaurant will result in people smoking on the pavement and drinking alcohol causing further issues for local people. The entrance door to the flats on 31 Betterton Street and the door to the proposed restaurant are within inches of each other, customers coming in and out and smoking outside the restaurant will have a serious impact to me
- fire safety risks considerations for flats above the proposed restaurant
- noise and vibrations for flats above and on either side of the proposed restaurant

In addition, there are two administrative issues with the application. 1, the title of the application gives no insight into the full/true nature of the application - "Installation of an additional mechanical ventilation system and new mechanical ducting on the rear elevation ground floor and basement and alteration to the front elevation including façade" – people assumed (myself included) that this was related to ventilation for the nail bar and took no action as a result. 2, In the "Neighbour and Community Consultation" section of the application it states that "The Applicant has consulted with neighbours accordingly". I live in the building and have not been consulted, nor have others in or adjoining the building, this is even the case of the company who manages the building. For these reasons alone the application should at minimum have an extended period for consultations to the appropriate groups/parties.

As stated above, the details of my objection are below, these should be read in conjunction with the Design and Access Statement for the application.

Site Context (Section 2.1, page 11 of the Design Access Statement)

Contrary to the description provided in the above section, Betterton Street is a quiet residential street with little footfall, the central part of the Street is occupied by a 4-story block of residential flats (Camden House).

Over time commercial enterprises have largely been converted into residential dwellings, as a result local residents have enjoyed the uninterrupted and quiet nature of their street. There is a leafy nature to Betterton Street, with 5 mature trees, parking is all residential with the exception of a couple of loading bays for offices. The only remaining commercial buildings are the Poetry Café which has not been in use for the last couple of years, I believe this is also due to the lack of footfall in the street. The other retail premises is a dry cleaner which fulfils the needs of the local community.

Betterton Street – demonstrating residential is residential, leafy green nature:



Contrary to that stated in the Design and Access Statement Betterton Street does not intersect with China Town and Covent Garden. Betterton Street is not used to access either area. Visitors to Covent Garden typically arrive from Covent Garden underground to the South East of Betterton Street. Visitors to Soho and China Town are serviced by the Piccadilly Circus or Leicester Square stations and various bus routes. People do not access these areas via Betterton Street, there is no logical reason to do so. Again, this is evidenced through the lack of footfall on the street.

The two streets that run parallel to Betterton Street (Shelton Street and Shorts Gardens) are both almost entirely residential, as per Betterton Street. Apart from residents using the streets to go to/from work, they form important routes to our nearby GP practice (Covent Garden Medical Centre – 50 metres away), the local primary school (St Joseph's Primary School – 200 metres away) and Camden Council sport centre (Oasis Sport Centre) – 150 metres away). These are key amenities that all our residents use as needed, it is not appropriate to have another bar (change to **Class E - Commercial, Business and Service E(b)** to Sale of food and drink for consumption (mostly) on the premises) in the vicinity of these facilities. When considering the residential nature of the area it is important to look at the detail of each ward within Camden Council. General statements provided in the Access Statement about Camden as a whole (see page 11 on the Design Access Statement) do not give the correct impression of the immediate vicinity. Betterton Street is in the Holborn and Covent Garden Ward, this is the 4th most densely populated Ward in Camden (2019 data) and is projected to grow in residential population to a greater extent than other wards in Camden. The growth will come through increased residential developments and conversions of commercial use shops to residential.

The application does not provide adequate detailed consideration of the awnings and ventilation system to the attached listed building (33 Betterton Street) – eg by the proposed awning abutting straight up to the listed property.

Planning Policy

The application does not align to the National Planning Policy, the Camden Policy nor the London Policy frameworks. The excerpts provided in the Design Access statement for this application show how this is the case – for instance in section 12 of the National Planning Policy Framework 2023 “[applications] creates better places in which to live and work and helps make

development acceptable to communities". A restaurant/bar in a residential street will not create a better place for people to live. In the London Plan 2021 "ensuring Londoners in all parts of the city have adequate efficient transport networks and services, and the support for cycling and walking to enable them to access job, social and other life opportunities while minimising any adverse impacts on the environment or quality of life". A restaurant/bar on Betterton Street is contrary to this as it will impact the ability to use the pavements (the pavement outside 31 Betterton Street is very narrow) and will have an adverse impact on the environment and quality of life of the residents with increase noise, waste and footfall. Another notable point provided in the planning application reference the Camden Planning Guidance - Town Centres and Retail (January 2021) is the following statement "2.38 The impact of food, drink and entertainment venues not providing dedicated outdoor smoking areas includes noise, litter, congestion and anti-social behaviour". There is no space for people to smoke, people wanting to do so will create congestion and anti-social behaviour impacting the residential nature of Betterton Street.

Noise Consideration

As is stated in the Planning Framework and referenced in the Design and Access Statement, planning permission will only be provided if assessments have been made on the impact of noise and vibration. The following is noted in the Planning Framework "food, drink and entertainment uses, often close to where people live, and as a result, conflicts can arise (see Policy TC4 Town centre uses). Such sources of noise and the character of noise can increase stress levels and cause significant disturbance". This has not been considered in the application.

Relevant Planning History (Section 4.0, Page 36, Relevant Planning History in Design Access Statement)

The Holborn and Covent Garden Ward is characterised by areas of entertainment and retail spaces with pockets of almost entirely residential areas, as is the case with Betterton Street. The examples provided in the Access Statement are in areas with significant entertainment and retail – eg on New Oxford Street. This is in no way comparable to Betterton Street.

Proposed General Arrangement of Application (ref 6.4, Page 54, Proposed General Arrangement in Design Access Statement)

Fire risk assessments for the flats above the proposed restaurant have not been made. One section of the entrance hall in the building is not structural, any fire would easily impact/put at risk the entire building. Fire assessments must be made for the safety of the residents of the building.

There is no space for waste/refuse in front of the building (the pavement is c.4ft from the building). Litter will quickly be strewn across the street.

The ventilation system is proposed to be attached to the back of 31 Betterton Street, this is directly below the balconies of Flat 1, 2 and 3 and all the balconies of Betterton House which is adjacent to the proposal.

The application is to have the restaurant open on Sundays until 10pm at night. This is not aligned with other restaurants in the majority of Covent Garden.

Many thanks