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via: Planning@Camden.gov.uk

14th April 2025

Dear David,

Re Proposed redevelopment of 125 Shaftesbury Avenue, application no. 2024/5408/P

Covent Garden Community Association would like to comment on various aspects of this application.

We are generally supportive of the proposed redevelopment for reasons such as:

- It replaces a bulky, high, dark characterless building without fully demolishing the structure. Although the replacement will be bulkier and higher, its design has more character and is much lighter in colour, so we believe that it will actually be visually less dominant from several viewpoints.
- The rear of the current building is subject to serious antisocial behaviour and drug-related street crime. So improved security presence and measures should improve the situation, alongside a) the removal of all external furniture at night which we understand has now been agreed, and b) the option of using gates to close-off Little Compton Street, which we understand has also now been agreed.
- The development means that Salsa, the large, late-night club in the basement on the Charing Cross Road side of the building, will leave. This club has been poorly managed for years, causing significant nuisance to residents. The developer has assured us that no similar use will be sought on the site.

Nevertheless, the context of the building means that it has the potential to give rise to serious amenity issues if any consent is not tightly conditioned. The majority of our comments relate to potential planning conditions, while one important comment relates to a small part of the design.

Context at the back of the building

The area to the rear of the site it is unusually quiet and residential for central London.

The building overlooks the Phoenix Garden, the last community garden left after the 'Battle of Covent Garden' in the 1970s preserved the historic neighbourhood which was due to be bulldozed. It is a precious space, known for its wildlife and tranquillity. Next to it is a small playground in St. Giles Churchyard, the only playground for children in the Camden part of Covent Garden, or indeed Soho.

Buildings immediately next to the site on Phoenix Street are residential. On the quiet part of the street, near the back of the development site, these are 1a Phoenix Street (10 flats) and The Alcazar (8 social housing flats). Beneath the Alcazar, there are 4 family houses at 7-10 Stacey Street.

The building on the opposite side of the Phoenix Garden is also residential. Pendrell House has 25 social housing family flats and maisonettes, many directly facing the development site. A short way along New Compton Street there are many more dwellings. Next door to Pendrell House are 24 flats at 45 New Compton Street, with 14 more opposite at Lindsay House and another 14 above at Glass House.

This arrangement of buildings around Phoenix Garden creates an amphitheatre in which sounds reverberate and are amplified as they bounce around. Any noise made here carries to many residential windows.

Terraces

The scheme includes a number of large terraces. Our experience is that these spaces can cause serious problems for nearby residents because office users may have an after-work drinking culture and/or hold noisy events. So, to make such developments acceptable, we generally ask for restricted hours of use, and restrictions on music or amplified sound. For example, at 164 Shaftesbury Avenue the office terrace has hours of use Monday - Friday 08:00-19:00. At 1 Flitcroft Street (by Stacey Street) a very small office terrace has hours restricted to Monday - Friday 08:00-20:00. At 160 Drury Lane a terrace behind an office was refused completely for the same reasons.

Further, since the building has Class E use, any of the terraces could become part of a restaurant or other more intensive use at any time, such as has happened recently in office buildings at 5 Langley Street and 28 Shelton Street.

Given the noise sensitive context at the back of the development site, as discussed above, we ask for more restrictions there.

Conditions request:

1. Terraces at the rear of the building or near residential units, numbered in the application images as 2.2, 3.1, 4.2, 5.1, 5.2, 8.2, 8.3, 9.1, 10.3, 10.4, 11.2 on the Stacey Street side, as well as terrace numbered 6.1 which is in a recess beside flats at Trentishoe Mansions on the Charing Cross Road side.
Hours of use restricted to Monday - Friday 08:00-19:00.
2. Terraces at the front of the building, numbered in the application images as 7.1, 8.1, 8.4, 10.1, 10.2, 11.1, 12.1, 12.2.
Hours of use restricted to Monday - Friday 08:00-22:00, Saturday 09:00-22:00, Sunday 10:00-20:00.
3. Terraces listed as inaccessible to be conditioned only to be used for access and maintenance, numbered in the application images as 2.1, 4.1, 12.3, 12.4.
4. No music or amplified sound to be played on any terrace.

These conditions are required to make things liveable alongside such a large development occupied by so many people, without which we and the residents living alongside believe that it would be unacceptable.

Nuisance from deliveries & servicing

When development is done in a part of our area that has quiet side streets, like this part of St. Giles, increased deliveries and servicing can be a big issue. This building will have an internal servicing bay, but vehicle movements will still cause nuisance at antisocial hours, especially as reversing will be necessary.

Based on the floor areas and a reasonable estimate of dwell times, we are advised that the building needs to be able to take deliveries for 13 hours per day (68 deliveries split 70/30 LGV and MGV = 7.5T) during the week.

The applicant's suggested hours for this activity are 06:00 to 22:00 every day. However, this 16 hour daily window is not needed, and the very early and late times will be disruptive on quiet residential back streets like Stacey Street and New Compton Street. Just because it is Central London is not a reason to disturb residents.

Conditions request:

5. Deliveries and servicing should take place only within the hours of 07:00 to 20:00 Monday-Friday, 08:00-20:00 on Saturdays and 09:00-20:00 on Sundays.
6. Vehicle reversing alarms should be switched off before 08:00.
7. No vehicles to wait on Stacey Street or New Compton Street.

Ground floor Class E uses near to residential

The applicants have indicated that they do not intend any units on the Phoenix Street / Stacey Street side to be used other than for retail. However, under Class E this could change at any time to restaurant use, for example, with the sort of harm to amenity in terms of noise nuisance discussed above. Noise at non-social hours is the issue, so we suggest a time restriction as the best way of dealing with it.

Condition request:

8. Ground floor units with doors onto Phoenix Street and/or doors onto Stacey Street to be permitted hours of use 08:00-21:00.

Light pollution

This is going to be a huge building with a lot of glass. When fully lit it will be very bright. If lights are left on at night, it has the potential for residents at the back no longer to experience night-time darkness, with all the associated mental health issues that brings. Lights on all night would also have a destructive effect on birds and other wildlife in the Phoenix Garden and St. Giles churchyard.

Conditions request:

9. No lights above ground floor level (except emergency lighting) to be kept on between the hours of 22:00 and 07:00.
10. At any other times, lights to be set at a dim level (to be determined by the council's advisers) in spaces above ground floor level that are not being used.

Dockless Bikes

Dockless bikes cause problems wherever the capacity of designated bays is insufficient and where the operating companies do not relocate them quickly enough. There is already insufficient capacity in areas near the development site, with bikes left to pile up all over the place. This new development will lead to more dockless bike journeys from commuters and from customers to the commercial units.

Since there is no capacity for parking, provision should be made within the footprint of the development so that no public realm or current kerb space (such as residents bays and loading bays) is lost.

Residents do not want this capacity to be located at the back of the building because the bike-related activity draws noise and antisocial behaviour. Dockless bays have had to be relocated away from residential parts of Tower Street and Mercer Street for this reason. Dockless bike space should therefore be made available within the envelope on the Charing Cross Road and/or Shaftesbury Avenue sides.

Condition request:

11. Provision to be made for dockless bike parking within the building envelope on the Charing Cross and Shaftesbury Avenue sides.

Overshadowing

The impact of the current building on the Phoenix Garden and St. Giles playground can be seen in the photograph below. A higher building with less stepping-back to the South, as proposed, will have more impact. However, if the former Odeon building at 135 Shaftesbury Avenue next door is doubled in height (as currently proposed under application no. 2024/0993/P) it is easy to see why the two together would result in unacceptable loss of sunlight and a failure to reach even the BRE's sadly low 2-hour targets.

It is well known that we oppose the proposals for 135 Shaftesbury Avenue along with Historic England, Theatres Trust, Seven Dials Trust, the Conservation Area Committee and the residential population. We therefore hope that it will not be consented. However, if it were to be consented then we do not believe that the proposals for 125 Shaftesbury Avenue can go ahead in their current form and would need modification to bring the cumulative damaging effect on Phoenix Garden down to a more acceptable level.



View showing impact of the current building and an idea of cumulative impact of extensions to this and to 135 Shaftesbury Avenue on Phoenix Garden and St. Giles playground.



Current view of stepped-back elevation from North end of Mercer Street.

Design

The current building is much less oppressive over Shaftesbury Avenue than it would otherwise be, because its frontage is heavily stepped back from 6th to 11th floor level. The new development proposes bringing the 6th to 8th floors completely forward, and the 10th to new 12th floor levels partly forward. The facade would present much more of a 'cliff', dominating this part of Shaftesbury Avenue and dwarfing the historic Saville Theatre (ex-Odeon) building.

Recent revisions to the design add a cornice at the top of the 6th floor, acting as a 'trompe l'oeil' that improved the appearance from the front. This lessens the impact on the Seven Dials conservation area from the West end of Earlham Street. However, it still has what we believe to be a damaging impact at the North end of Mercer Street, the view currently shown in the photograph above.

In combination with our observations regarding overshadowing, above, we believe that a second look at this part of the design is merited. We believe that a reduction in the ‘cliff’ effect would deliver a more beautiful building, while improving light penetration and resulting in less harm to the conservation area at the same time.

We hope that our comments are helpful. We have made them in consultation with residents living all around the site, although they told us that they felt ill-equipped to comment on detailed conditions for the new proposals themselves.

Local people have also told us that they are, understandably, very concerned about the disruption from demolition and construction works, and would like to be involved in the Construction Management Plan. They would like input into the building’s Operational Management Plans, too.

Could you require, please, that a **liaison group** be set up as part of any consent that will address these issues?

Yours sincerely,

Amanda Rigby
Co-Chair

