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Rob Tulloch
East Area Planning Team
Camden Development Control
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

October 3rd, 2013

Dear Mr. Tulloch,

Application 2013/5536/P - 16 Neal's Yard London WC2H 9DP

The CGCA wishes to **OBJECT** to this application for a change of use for 16 Neal's Yard from A1 retail use to A3 use.

The reason for our objection is that the proposed change of use would further increase the concentration of premises in food and drink use within Neal's Yard and would therefore cause significant harm to the amenity of residents in the area.

The applicant is fully aware of Camden's Central London Guidance for Food, Drink and Entertainment uses within the area of Covent Garden as he quotes the document in his letter. However his reading of the document is rather selective as he quotes from Paragraph 8.7 which discusses the calculation of percentages in a frontage but does not mention the reasons for the policy (set out in 6.17 and 6.18) and also does not seem to have read as far as 8.8 which makes clear that it is not just adjacent but also opposite uses which are taken into account in deciding what constitutes a cluster.

The SPG makes very clear that any clustering of food, drink or entertainment uses is to be avoided. Paragraph 6.18 states:

The clustering of food, drink and entertainment uses can contribute to an unacceptable cumulative impact within an area. The development of clusters of food, drink and entertainment uses can also undermine the mixed use character of an area, and can result in displacement of specialist uses that contribute positively to the character of an area and to the range of facilities and services provided. The Council will therefore not grant planning permission for development which creates harmful clusters of food, drink and entertainment uses. This includes the development of new clusters, as well as the extension or intensification of existing clusters.

The CGCA's position is that Neals Yard already constitutes a "harmful cluster" and that the conversion of another premises into a food/drink use would intensify this and so cause additional harm.

The applicant appears only to have considered A3 uses at ground level on the East side of Neal's Yard in his calculation and has decided that there is only 1 other unit (presumably Home Slice). However Food and Drink units can also be in other use classes. There is a cafe next to the application site and the

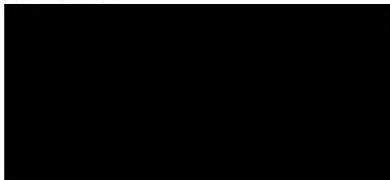
entrance for World Food Cafe is at 14 Neals Yard, with the premises at 1st floor level. In addition there are A3 uses at 8-10, 1, 1a and 2 Neal's Yard and also Souk restaurant which is accessed both from Shorts Gardens and from Neal's Yard.

The attached version of the applicant's location map shows all of these Food and Drink units as well as the application site. There is clearly already a cluster with 9 units already in food or drink use.

Given that the applicant is the owner of most of these premises it seems astonishing that they have failed to mention their existence in the application as they are well aware of the SPG which applies.

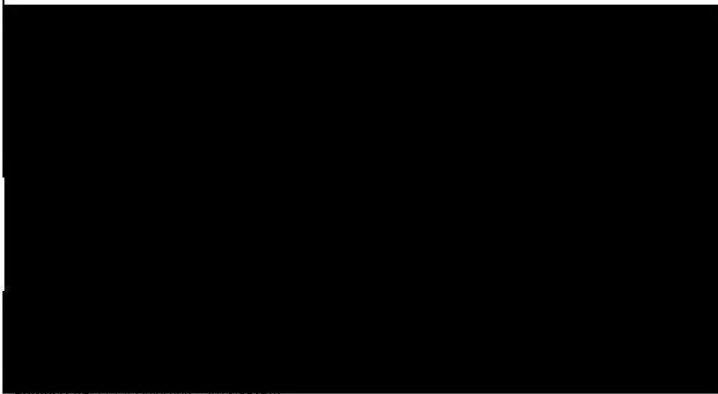
Neal's Yard is an enclosed space and any noise within the space is clearly audible to the residents who live in the surrounding flats and so harms their amenity. If the Council was minded to grant any form of permission we believe that the hours of use should be severely restricted to ensure that the harmful effects were restricted to the daytime rather than being allowed to extend into the morning or evening. Therefore any A3 use, if one were to be granted against the SPG policy, should be restricted to 08:00-20:00.

The CGCA would like to appear at the DC hearing which will discuss this application.



Map of Neals Yard Area including other food and drink premises within Neal's Yard





Subject: RE: CGCA Objection - 2013/3336/P

Dear Sirs,

I would like to point out that the website clearly states that comments are accepted until 10/10/13 even though the Application Dates section says that the consultation expires on 2/10/13. Surely these 2 dates should be consistent .

We have assumed the "comments until" date applies in this case.



Help Using This Page

This page shows a progress summary of the **Application** chosen.

Click a link at the bottom of the page to view further information related to the displayed record.

If no map appears below, or no associated documents are found it means this is either an historical application which we have not mapped yet or a new application awaiting scanning .

Details Page for Planning Application - 2013/5536/P

Site Address 16 Neal's yard London WC2H 9DP

Application Progress Summary

Application Registered 11-09-2013

Comments Until 10-10-2013 [Add Comments Here](#)

Date of Committee

Decision

Appeal Lodged

Appeal Decision

From: David Kaner [mailto:david.kaner@outlook.com]

Sent: 03 October 2013 15:48

To: 'ppp@camden.gov.uk'; 'rob.tulloch@camden.gov.uk'

Cc: 'Meredith Whitten'; 'mjleeson@hotmail.com'

Subject: CGCA Objection - 2013/5536/P

Dear Sirs,

I attach the CGCA's letter of objection for this application.

Regards

David Kaner

CGCA Planning Committee

07868 753549