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| 2016/0477/P     | Bianca Adam             | 35 New Oxford<br>Street | 03/03/2016 18:57:40 | AMEND           | My main ground of objection is loss of small affordable accommodation with the Holborn and Covent Garden Ward.  |
|                 |                         |                         |                     |                 | The site currently includes a number of small studio apartments occupied by long term existing residents, who will be displaced from the area, unless replacement units at lower than market rents can be secured within the redevelopment scheme.  |
|                 |                         |                         |                     |                 | The scheme as currently presented does no take any account of existing residents by offering any form of subsidised housing, even for a limited period. Neither does it include any traditional form of affordable units.   |
|                 |                         |                         |                     |                 | As such the scheme represents a further cleansing of existing residents by pricing them out of the area. In this particular case, we are dealing with long term residents, I have been myself in the area for 14 years.   |
|                 |                         |                         |                     |                 | To the above I am adding Ed Salter's comments regarding the situation of The Old Crown pub at 33 NOS. I already mentioned this in my previous email - his business has been massively impacted by the GPO works and the prospect of being literally surrounded by building sites is extremely discouraging. I have looked over the 2013 refusal reasons and number 3 caught my attention: |
|                 |                         |                         |                     |                 | Reasons 3 The loss of the nightclub use would impact on the range of night-time leisure activities and entertainment venues, contrary to London Plan policies 2.11 and 4.6 and Camden policies CS9, CS10 and DP 15.   |
|                 |                         |                         |                     |                 | Even though number 33 is not part of the proposed scheme, the implications mentioned above will very likely impact leisure activities in the area as this pub has been highly popular amongst residents and tourists for more than 10 years.  |

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| Application No: 2016/0477/P | Consultees Name: juliano santana | flat 1 35 new oxford street WC1A 1BH | Received: 03/03/2016 18:57:59 | Comment: APP | Response:  I wanted to voice strong opposition to the proposed project at 35-41 New Oxford Street. I have been a resident at 35 New Oxford Street for over 5 years. The development company leading this project has not informed residents at our building that would be directly impacted of the works. They have then stated that they have contacted all residents in the area and held public meetings. It is very worrying that they have not contacted those most impacted by this project who would be likely to submit critical feedback and then put forward the feedback they did receive from the public in attendance at their showcase meeting as representative of all residents in the area.  In reviewing what I could of the plans put forward, there will be a period of two years during the construction when no residential units will be available. Following completion, there will be a decrease in the overall number of residential units available. Following completion, there will be a decrease in the overall number of residential units available. The units that will be available will after completion are highlighted as being of a higher standard in the application but in reality this will mean a much cost for renters in an already expensive area.  I would ask that:  1. The council allows for an an extension from the current planning schedule to have more feedback from additional residents that have been left out of the process up until this point.  2. That an agreement is secured from the developers to have a portion of the newly available units at near (or at an reasonable increase) from the current rates of the existing flats?  3. If it would be possible for the development company to give occupancy preference of the newly built units to current residents? Many of us have lived here for close to a decade and have developed a closely knit community.  Thank you for your consideration and advocacy of the community on this application.  Many Thanks, |
|                             |                                  |                                      |                               |              | Juliano Santana   |

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| 2016/0477/P     | Meredith Whitten<br>on behalf of the<br>CGCA | Covent Garden<br>Community<br>Association<br>42 Earlham Street<br>WC2H 9LA | 03/03/2016 16:33:53 | COMMNT   |

## Response:

In general, the CGCA supports the proposed redevelopment of this site, as the buildings have fallen into a state of disrepair that creates a void in a high-profile location on the border of two conservation areas. Given the dire impact of other recent proposals for redevelopment of sites within Covent Garden (notably 90 Long Acre and the block bound by Drury Lane and Arne, Shelton and Dryden streets), the CGCA is relieved that the applicant has submitted proposals that do not call for increased bulk and massing that is out of keeping with the conservation area and the local character.

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However, the CGCA does have some concerns about the proposed scheme. These are noted below.

- 1. Whilst the proposed design is considerably more sensitive to the impact on local character than other recently proposed schemes in Covent Garden, and is more sensitive to the character of the buildings it seeks to redevelop than the two previous proposals (both of which were refused), the CGCA remains concerned about demolition of the buildings behind the facades. Whilst we support refurbishment and retention of the existing Victorian facades and undoing past interventions that compromised the period features of the original architecture, we want to ensure that sufficient evidence has been provided to justify demolition of buildings behind the façade. Although these buildings are not listed, they do contribute to local character. As such, the proposed loss of the buildings that make a positive contribution to the local area could harm the character and appearance of the conservation area.
- 2. The applicant should be required to be more specific regarding class of uses. By asking for flexible A1, A2, A3, A4, B1, D1 and D2 usage, the applicant is essentially asking for a blank canvas on which they can put any type of use they want. During the pre-consultation period, the CGCA notified the applicant that more detail on specific class uses should be provided in order for the CGCA, and other consultees, to adequately provide comments. Granting the applicant permission to potentially change use at some point in the future without the need to apply for planning permission or consult with neighbouring residents at that time effectively removes this premise from planning control. The impacts on local residents of A1, A2, A3, A4, B1, D1 and D2 vary significantly, such as with noise and disturbance, odours, and servicing and delivery needs. The applicant has indicated that such flexibility is needed because they are unsure of their marketing strategy. However, to ensure the viability of the scheme, the applicant must have conducted research on classes of use and potential tenants.
- 3. The applicant has failed to identify affected residents in the area. The documents refer only to one building of residents on the north end of Grape Street. However, existing residents are closer to the proposed site, such as directly adjacent to the site in West Central Street.
- 4. Given the information above in item 2, the applicant should resubmit a noise report to more accurately reflect the closest noise-sensitive windows. The daylight/sunlight report should also be revised to reflect impact on neighbouring properties, not just those proposed in the development.
- 5. The proposed servicing and delivery has increased significantly, from 10 two-way trips daily to 18 per day. The CGCA is concerned about the impact this will have on existing residents as well as new residents and existing businesses, particularly given that the streets to be used are designated as one

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way. Additionally, the applicant has not adequately explained the route servicing vehicles will take and the size and type of vehicles used. The application also does not specify the amount of time each vehicle will be parked in the loading bay, how often this loading bay is in use by other commercial establishments in the area and how the applicant will keep from causing disruption to the very heavy traffic flow along New Oxford Street. This is a heightened concern due to the predicted increase in traffic resulting from the nearby Crossrail.

- 6. To protect residential amenity from noise and disturbance resulting from the proposed plant, the following conditions must be included with any permission granted:
- (1) require the applicant to ensure that equipment is kept working efficiently and is not causing disturbance to nearby residents, as verified through annual maintenance checks performed on all equipment, including ducting, throughout the life of the development (CMP S32);
- (2) require the applicant to submit the results of annual maintenance checks to the Council for approval;
- (3) restrict the amount of noise (measured in decibels) emitted from the units to within Westminster's thresholds:
- (4) limit the hours of use to 09:00-23:30, which will reduce the impact of noise and vibration on residential amenity during evening, late-night and weekend hours; and
- (5) require automatic time clocks to be fitted to the equipment/ machinery hereby approved, prior to commencement of the use of the units, to ensure that the plant/equipment does not operate at any time other than that permitted. The timer equipment shall thereafter be permanently retained and maintained and retained in accordance with the manufacturer"s recommendations.
- 7. The CGCA is disappointed to see that on-site affordable units are not included in the proposals. Currently, the site includes a number of small studio apartments occupied by long-term existing residents, who will be displaced from the area. The applicant makes no mention of any proposals to accommodate these residents, such as by offering replacement units at lower than market rents, even for a limited period. As such, long-term residents, who make up the fabric of the neighbourhood, will be priced out of the area.
- 8. Whilst the CGCA is pleased to see the inclusion of green roofs in the proposals, we believe the applicant has missed a significant opportunity for further urban greening efforts in an area that is sorely lacking in any space of environmental and biodiversity value. These proposals will contribute to pressure and demand on the severely limited open space in the area, and particularly green space. The applicant should consider the use of additional urban greening, including green walls and bat and bird boxes and plantings to attract bees (such as on the proposed green roof).
- 9. Finally, the CGCA notes that there are a number of small and local businesses in the area that will be greatly affected by any works. The CGCA encourages the applicant to be sensitive and considerate of their needs to continue conducting business and to implement a considerate contractor scheme that provides local businesses with a contact name and number to call should any problems arise.

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| 2016/0477/P     | Joshua J F Trigg        | 6 Denmark Street<br>WX2H 8LX | 03/03/2016 23:54:37 | OBJ             |

## Response:

As a local business owner in the borough of Camden I remain skeptical of new developments such as the proposed. I feel very strongly about maintaining the character of the area for the benefit of my own business, my neighbours and the wider community. As such, I don't believe this proposal represents what is in the boroughs best interests. In my view, these proposals provide no benefit to the local community, business owners or tourists in the area. It is yet another development that aims to capitalise on the exorbitant rise in the value of centrally located property to provide investment opportunities for the extremely wealthy, weakly substantiated by lip service to local development policies.

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In reference to Camden Development Policies 2010-2025, there are several items that I feel this development proposal does not address:

- 1. There are policies to provide jobs and facilities to the local area that this proposal does not suitably achieve.
- 2. There is no mention of provision either on-site or by the way of commuted sums for "affordable housing" which is contrary to the development policies DP3 & DP4. With further reference to this, the pre-application consultation states that there is a promise that "none of the existing residential tenants would be evicted". Yet there are currently 26 units and only 21 residential units proposed. My understanding was that developments in the Camden area should provide more housing to accommodate the growing population. Not less.
- 3. In addition, in section 2, paragraph 2.2 of the development policy, there is an emphasis on reducing social polarisation, securing mixed and inclusive communities by securing a broad range of housing of different sizes and types to meet the needs of different groups and households in different circumstances.
- 4. There is no mention of "community benefits" aside from the promise of taking on local apprentices for the build phase, which has no long term impact for the local community.
- 5. This development aims to remove a potential attraction from the area and contradicts DP14, which states that the policy aims to "maintain and encourage a range of attractions and accommodation in the borough for Camden's visitors."
- 6. According to DP1 paragraph 1.7, there is an urge to make the best use of the boroughs limited land as Camden's population grows. I feel that repurposing the pre-existing night club venue is a poor use when considering its unique suitability for a late night entertainment venue (which it previously held a licence for). I fear that another loss of a venue such as this will lead to the gradual attrition of Camden's character as a dynamic and attractive place (particularly for nightlife of which it was once famed) where utilities are removed and unable to be replaced. In the Camden Core Strategy, it is stated in the Council's Statement of Licensing Policy that there is a restriction on new premises licences and new club premises certificates. A change of use for this development would see a uniquely suitable venue lost and unable to be replaced. There are few locations that would satisfy the criteria outlined in DP12 12.8 for a suitable night entertainment venue. There are many other spaces that are suitable for residential purposes and few that are fit for night-time activity. I feel it should be used as originally intended to maintain the vibrance and attraction of the area.
- 7. In terms of the development proposal plans, additional floorspace in residential use should match all additional floorspace in non residential use (DP 1 P1.10). This does not sit well with the proposed development of 2,266 square metres of residential use compared to the 1,842 square metres of

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non-residential use.

Denmark street has seen similar proposals that threaten the unique culture and heritage of the area of which I have vocally objected to. What makes the borough of Camden an attractive place is its wealth of amenities and attractions. I don't feel that the proposal to accommodate a selection of small retail outlets outweighs the loss of a major entertainments and arts venue or the housing options provided will offer any real benefit to the local community. I do want to see the area re-invigorated by further development, however I suggest that the developers re-evaluate their proposals to include provision for the points I have outlined in order to align with the best interest of the borough and the community.