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AMENITY GROUP CONSULTATION COMMENTS

Date 20 October 2016

Planning Application Number
2016/5202/P

Planning Application Address
125 Shaftesbury Avenue WC2H 8AD

Proposal

Remodelling, refurbishment and extension of existing office building (B1) at upper floor levels, roof level and within lightwells to provide 9,682sqm additional floorspace, including terraces, a new public route, a relocated office entrance (Charing Cross Road), rooftop plant and flexible retail uses (A1/A3), along with associated highway, landscaping & public realm improvements.

COMMENTS

Whilst the CGCA does not object to the scheme in general, we do have the following specific concerns regarding housing and servicing that must be addressed before any permission is granted.

- 1) **HOUSING:** The CGCA is disappointed in the lack of on-site housing provision, which disregards Camden's policies. In the applicant's Housing Study supporting document, section 5.0 says £5.4 million would be needed to provide required housing on-site. However, in section 6.0 the applicant offers £2.1 million for provision off-site. The objective of the DPI policy was to provide housing on-site, thus, the CGCA believes that the Council should require sufficient housing units (including affordable units) be provided on-site before any permission is granted.
- 2) **EXTERNAL WALKWAY/TERRACES:** The CGCA shares adjacent residents' concerns about privacy and overlooking, as well as noise and disturbance, from the external walkway and terraces. Indeed, DP26 notes that residential amenity of existing residents must be preserved. Any permission granted must include a condition that limits the hours of use of the balcony/terrace to standard business hours (no earlier than 08:00 and no later than 21:00 Monday through Friday, and not at all on weekends and Bank Holidays). This condition is needed to protect residential amenity from overlooking and privacy, as well as noise and disturbance at anti-social hours. For precedent, see 2014/4870/P, condition 10.
- 3) **SUSTAINABILITY:** The proposals should aim for zero-carbon build and should use bright surfaces to direct light to shaded areas.
- 4) **SERVICING:**
 - a. Land Use: The proposed A1/A3 retail units at ground-floor level on Phoenix Street face residential accommodation and there are existing A3 and Theatre uses on the street which already generate noise which disturbs local residents. The addition of possible two more A3 units would mean that all the commercial unit on both sides of Phoenix Street are in entertainment use. Policy DP12

requires that the impact of these types of use on residential amenity are taken into account. The CGCA's view is that the unit at the East end of Phoenix Street is A1 only and that its hours of use should be restricted to 08:00-22:00 on Monday to Saturday and 10:00-20:00 on Sunday in order to minimise the impact on local residents.

We welcome the removal of the Nightclub use from the basement area. This had a huge impact on residents in Tavistock House (on Charing Cross Road). However the removal of this use on Charing Cross Road (which is a major thoroughfare) does not mean that it is appropriate to add an A3 use on Phoenix Street (which is quiet and largely residential especially at the Eastern end)

The other A3 units in the development should have their hours of use restricted to 08:00-23:30 on all days of the week.

- b. Servicing: The servicing plan (included in the Transport Assessment document) states that the majority of deliveries will be made to the service bay at the rear of the premises and that the retail units on Charing Cross Road can be serviced from the basement to which they have access via a lift.

It appears that the intention is that non-recyclable waste will be compacted and recyclable waste will be placed in Eurobins or wheelie bins.

The servicing vehicles will access the unit via New Compton Street.

The servicing trips are calculated as 68 for the office use and 11 for the retail uses (assumed to be A3). This is a total of 79 trips per day. The current level of trips is assumed to be 62.

The CGCA has the following concerns:

The number of servicing trips for the A3 uses is understated: The comparison locations used to assess trip numbers are Carluccios and Pizza Express. Only one of the units is in Central London, the others are in Twickenham and Kingston and the survey data is more than 10 years old. This data shows an average of 0.5 trip/100SqM GVA BUT there is significant variation.

The number of trips required for any type of use depends on many factors – including the style of the premises and their choice of suppliers. If a premise uses a single supplier for their logistics solution then they will be able to have fewer trips. All of the sites chosen for the comparison use a single provider (Carluccios use Knights of Old and Pizza Express use Bidvest). If the A3 units proposed do the same then the result may be similar for each unit, but this cannot be assumed. If they have a range of suppliers then there could be 5 or more daily trips per unit.

Also as well as the total GVA in A3 use we need to take into account the number of units, as each unit will have its own suppliers. There are 6 units in the proposed development. If every unit has 2 deliveries per day that is already 12 deliveries. If they have 5 then there will be 30. The applicant has assumed 11.

The number of deliveries to the A3 uses could be as high as 20 per day and that this needs to be taken into account.

The Waste Management Plan is too vague: The transport assessment states a waste management plan but makes no attempt to calculate whether the amount of waste which can be stored is adequate. The volume of storage suggested seems to be 3 Eurobins and up to 11 other bins for the whole development, as well as a compactor.

The development has 26,013 m² of B1 use and 2,138 of A1/A3 use. Waste Generation rates are typically 2.6m³ per 1000m² for B1 and 12.5m³ per 1000m² for A3 (0.5m³/20 covers for 500 covers).

This means that the premises could generate 97m³ of uncompacted waste per day. The amount capable of being stored is only part of this.

The servicing route passes many residential properties: The proposed servicing route along New Compton Street runs passes residential properties. The use of this street by this number of vehicles will cause congestion and pollution for these residents and so harm their amenity. The time for servicing at the premises should therefore be restricted by condition.

The CGCA recommends that the Council do the following.

1. Impose a condition requiring that all servicing takes place within the development (basement and ground floor area) and not from the street
2. Impose a limit on the number of servicing trips for the development – capped at 50 per day. This is perfectly achievable provided that deliveries of some items (e.g. stationary) are consolidated for different users prior to delivery to the site. This type of consolidation has been used successfully in other parts of Central London and it is necessary to impose this in Planning Conditions so that the requirement is clear.
3. Restrict the hours of deliveries and collections to be 08:00-20:00 on all days of the week, to prevent delivery vehicles disturbing residents in the surrounding area. If this time is not believed to be sufficient then deliveries and collections can take place outside these times if the premises are accessed along the southern part of Stacey Street AND they comply with TfL's Guidance on Out of Hours Deliveries.
4. Require the Applicant to calculate the amount of waste to be generated and how this will be stored inside the premises and collected.
5. Require that any use in the development which produces glass waste (including but not limited to A3 use) installs glass crushing equipment, or has access to a glass crusher to ensure that the volume of glass waste generated, and the noise associated with its collection, are minimised.

Comments submitted by

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