

Gordon Mansions Residents Association

Please reply to: [REDACTED] Gordon Mansions Residents Association,
[REDACTED]

**Regeneration and Planning,
Development Management,**
London Borough of Camden,
Town Hall, Judd Street,
London WC1H 8ND.

25th September 2018

For the attention of [REDACTED], Principal Planning Officer.

By email to: [REDACTED] and planning@camden.gov.uk

Dear Seonaid [REDACTED]

Re: Former Royal Ear Hospital & Student Union buildings, Capper St/Huntley St, WC1:
Details of Waste Management Plan as required by Condition 6 of planning permission 2015/1281/P dated 20/01/2016 for erection of 6 storey building, and excavation works to create a 3 storey building, comprising a head & Neck Outpatient hospital (Class D1), following demolition of former UCL Medical Student Union & Royal Ear Hospital buildings.

Planning Application ref: 2018/4194/P

**Details of Waste Management Plan for UCLH's Phase 5 development:
UCLH's new Head & Neck (Dental) Hospital:**

I am writing on behalf of Gordon Mansions Residents Association (GMRA). We wish to comment on and object to aspects of the proposed Waste Management Plan, as set out below:

Gordon Mansions and the local residential community:

Gordon Mansions consists of two blocks of flats (77 in total). There is a long established residential community here in Gordon Mansions, which very much reflects the cross-section of the diverse population of Fitzrovia, having as it does a mix of different income, cultural and ethnic groups, including families with young children, and elderly people. Our two blocks are located at the junction of Huntley Street and Torrington Place. We are immediate neighbours, being next to (on party wall of) and opposite this new UCLH Phase 5 hospital building (UCLH's new Head & Neck (Dental) Hospital).

Our concerns:

For our residents, our main concern regarding the proposed Waste Management Plan is the impact on our residential amenity, including:

- (a) noise of the actual waste collection operations; (e.g. backing beepers; operation of loading waste onto vehicles which can be particularly noisy); and
- (b) the number of vehicle movements, waste vehicles themselves often being very noisy especially in the evening and at night time as they drive past our residential flats.
- (c) days and hours of the waste collections, relating to (a) and (b) above.

Information in the Plan not easy to access/interpret, and not transparent & clear:

In order for us to assess the impact of the proposals in the Plan on our residential amenity, we need to know such basic facts as the number of vehicle movements, as well as the total number of vehicles, per daytime/per night/per week; and the hours of collections/deliveries. It should be said that we have found it difficult to interpret and extract this information from the document.

It is a very great pity that the Plan has not set out a summary of this basic information in a clear and transparent manner.

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Re: Details of Waste Management Plan University for UCLH's Phase 5 development:
UCLH's new Head & Neck (Dental) Hospital:
(Former Royal Ear Hospital & Student Union, Capper St/Huntley St, WC1) - *continued:*

Planning Application ref: 2018/4194/P

In addition, some crucial aspects of the Plan are vague; for example, there are references to "daytime" and "night time" concerning waste collections, but gives no definition of these hours/time periods - crucial points regarding residential amenity. Our further concern is that if the Document (The Waste Management Plan) is not clear, it could be interpreted in different and unintended ways by the users in the future, to the likely detriment of our residential amenity.

The Plan's references to guidance documents, requiring mitigation:

The Waste Management Plan makes particular reference to various planning and guidance documents, about minimising nuisance and impact on neighbours/residential. We are greatly concerned that the Plan does not appear to specifically explain or clarify how it is going to minimise or mitigate these various nuisances/impacts that will affect our residential amenity,

These references that the Plan itself has picked out include:

- (a). **Para 2.4.6 re. Fitzrovia Area Action Plan**
"The council will have regard to particular impacts on residential amenity and will seek to prevent cumulative harm to residential amenity from noise and waste collection".
And *"... medical ... institutions can cause disturbance to residents through servicing ... particularly where these activities take place 24 hours a day or when ambient noise levels are low."*
- (b). **Para 2.4.4: re. LBC's Planning Guidance: CPG Design 2015:**
The Plan states that there are some key messages, including that the development should accommodate waste in a "safe location" so as to " minimise nuisance to occupiers and neighbours ; e.g. noise, odours, etc)".
- (c). **Para 2.4.5: re. LBC's Waste Storage Requirements 2011:**
Reference is made that waste management issues can have a major impact on any residential; and consideration of environmental aspects including noise are important.

Location of our flats/bedrooms concerning Deliveries and Servicing:

In our GMRA letter of 19/04/2015 concerning our comments on the original planning application (2015/1281/P), under "Deliveries and Servicing" we described the different locations of our flats and the likely impact of deliveries and servicing; which we briefly repeat below.

In order to assess the proposed Plan and its implications, it is important to appreciate the differing locations of our flats in the two blocks, in relation to (1) the loading bay/Shropshire House, and (2) to the vehicle routes pass the flats.

(1). Re: Shropshire Place and loading bay; and bedrooms affected by noise:

The rear rooms (mainly bedrooms) of the Gordon Mansions' Staircase 2 flats (Flats 17 to 30) which overlook the adjacent UCL Yard will be disturbed by noise from the Loading Bay, due to the low height of the existing two-storey building (end of Queens Yard) between the loading bay and the rear of these Flats. Thus, any noise at night in Shropshire Place is clearly heard from the bedrooms. Thus residents have raised concern that the various noises of these operations will still carry at night time to the rear rooms of their flats.

Thus, it is important that the waste collections/deliveries occur within the internal Loading Bay, and not outside in Shropshire Place.

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(2). Re: service vehicle routes to/from Shropshire Place/loading bay: disturbance to flats:

The original reason and clever concept of UCLH's Phase 5 design/layout (as shown in the approved drawings) was that the service vehicles would access this loading bay/ Shropshire Place directly from Tottenham Court Road via Capper Street, for both arrival and departure, in order to avoid service vehicles (which tend to be very noisy), especially at night time, going pass the Gordon Mansions flats in Huntley Street. In the evenings and night time, this part of Huntley Street is exceptionally quiet.

Unfortunately, Camden's West End Project scheme undermines this clever concept/layout (direct access from/to Tottenham Court Road) due to the proposed "pocket park" at the Capper Street/Tottenham Court Road junction. Thus, the service vehicles' route to/from Shropshire Place will always be forced down south-bound Huntley Street and into Torrington Place, and thus pass our flats overlooking both Huntley St and Torrington Pl, which will cause noise disturbance (waste vehicles are particularly noisy) in the evenings/ night times to many of the flats

We previously made the suggestion that the West End Project might allow evening/night-time access across the "pocket park" (pedestrianised paved area) for such service vehicles, so that the "residential" route (via Huntley St/Torrington Pl) for the service vehicles is avoided.

Thus, it is important that waste collection vehicle traffic is daytime only so far as possible. Also, consideration is given to a solution that allows accessing Shropshire Place directly from/to Tottenham Court Road via Capper Street (so that the lorry routes avoid the residential streets of Huntley Street and Torrington Place).

Various aspects in the Waste Management Plan:

We particularly wish to comment on and object to the following aspects which are likely to affect the residential amenity of the Gordon Mansions flats:

(a). Backing-beepers of waste collection vehicles:

The Waste Management Plan makes no mention of silencing backing-beepers. This is contrary to Planning Condition 13 which states:

"No backing beepers or any other noise emitting equipment or devices shall be used on vehicles entering or exiting the servicing bay on Shropshire Place shall be used between the hours of 9pm and 8am daily."

We would ask that this Condition is acknowledged and incorporated into the Waste Management Plan.

(b). Loading and unloading "out-of-doors", instead of in the Internal Loading Bay:

The Waste Management Plan describes in Section 3.7: Waste Collection Strategy how the typical daily waste collection will be carried out at the loading bay.

In points 5 and 6 respectively, it states that the general waste collection vehicle and the recycling waste vehicle "**will park in Shropshire Place**" i.e. out of doors (our embolding), with the bins being brought out from the Loading Bay and returned to the Loading Bay. In point 3, we assume that the intention will be for the Clinical waste vehicles to also similarly park in Shropshire Place for the waste collection operations.

All this is contrary to Planning Condition 7, which states that:

"No loading or unloading of goods, including fuel by vehicles arriving or departing from the premises shall be carried out otherwise than within the curtilage of the building".

In the Transport Statement, dated 02/03/2015, Clause 5.11.3, (which forms part of the Planning Permission), it states that:

"The internal loading bay will be the only area used during the night and is provided for bulk deliveries and clinical waste collections, which require more time to unload/load. The loading bay will be enclosed and a shutter will be provided which will be operated as required. The dedicated loading bay would minimise any noise associated with loading or waste collection."

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Shropshire Place is part of the public highway, and should not be regarded as being "within the curtilage of the building".

Thus, we would ask that the Plan is amended to clarify that all the waste collection/delivery operations take place within the enclosed Internal Loading Bay, so that noise is contained.

(c). Total numbers of vehicles; frequency of collections; times:

Although mentioned in various sections of the Waste Management Plan, it is very difficult to clearly identify and arrive at the overall pattern of collections and the various total figures:

- (1). The total number of waste collection vehicles per daytime/per night/per week;
- (2). The frequency of waste collections/deliveries;
- (3). The timings and days of the week.

We would particularly ask that the applicant supplies this information in a clear and transparent form for us, so that we can properly see/assess the likely impact on our residential amenity. This information is so crucial is being able to assess the impact on residential amenity. We would then like the opportunity to make further comment after seeing this information.

In the Plan document, it is difficult to distinguish between the arrangements for "internal" (i.e. within the building) collection of the waste streams, and the "external" collection (i.e. by a waste lorry in the loading bay); and thus for us the arrive at a definitive number and frequency for the waste lorry movements.

Furthermore, although the report refers to several different waste "streams" and thus different waste collection vehicles, the Report does not set out clearly what the total number of waste vehicles will be to service this building per day and per week throughout the year.

In section 3.7: Waste Collection Strategy:

Reference is made to "out of hours" vehicle arrivals: **what time is "out of hours" ?**

References are also made to "evening"; "early morning": it is not clear if these are waste collection times; **and if so, what times ?**

After point 7, the Plan states "*The exact waste collection times will be agreed closer to the site occupation date.*" **This vagueness greatly worries us, because it gives no possible hours limitations within which the collection times might occur. Will the applicant come back later when the hours sre know for further consultation ?**

In point 3, reference is made to "Clinical waste vehicle arrives". Nowhere is "clinical" waste defined. In calculating the number of waste delivery/collection vehicles is it another "waste stream" or is it a general term that covers some of the waste streams referred to in Section3.1 ?

In section 3.9: Waste Collection Frequency:

It states that "*It is anticipated that one delivery will occur per day for each major waste stream*", and goes on to refer to "clinical" waste containers.

In Section 3.1, it describes 8 (eight) different waste streams.

This mentions delivery for each stream; what about waste collections for each stream ? What is the total number of vehicles/vehicle movements involved ?

Thus, does this mean that there will be eight separate deliveries by eight different vehicles (and presumably a further eight separate collections by eight separate waste collection vehicles) ? Does this then mean 16 vehicles: this is a lot of vehicles and vehicle movements per day/evening/night to one location pass our residential flats, to which we would strongly object.

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(d). Days of collection:

The Waste Management Plan in para 3.10 says that there will be waste collection "every morning that the hospital is open". Currently, the hospital plans to be open and operational Monday to Friday 0800 hours to 1800 hours (see Transport Statement dated 2/3/2015, para 5.1.3).

But this Waste management Plan would not protect residents in the event that the hospital decided to be open at other times such as Saturdays and Sundays.

What is needed to protect our residential amenity is a clause which specified that there will be no waste collections on Saturdays after 1.00pm (1300 hours) and none at all on Sundays and Bank/Public Holidays.

(e). Hours of collection:

We would like to request that the hours of collection are restricted to between 8am (0800 hours) and 6.00pm (1800 hours) so that residents can enjoy some quietness in the evenings and can sleep at night.

(f). Size of vehicles:

The Waste Management Plan proposes the use of vehicles which are 6.6 metres long, but does not say anything about a height restriction.

Will these vehicles meet the height restriction of the loading bay of 4.5 metres high ?

(g). Co-operation with other users of Shropshire Place to reduce total number of waste collections:

Could the Waste Management Plan encourage the hospital to look at sharing general and recycling waste collections with the other buildings whose waste is collected via Shropshire Place ? This would help to reduce disturbance and pollution for residents.

In conclusion, we would particularly request that the applicant is asked to supply the statistical information (e.g. the number of vehicle movements, as well as the total number of vehicles, per daytime/per night/per week; the frequency of vehicle arrival/departures; and the hours of collections/deliveries) in a clear and unambiguous form, so that we can properly see what is being proposed, so that we can assess the implications for our residential amenity. When we have this information, we would like to have the opportunity to comment further.

If you have any queries on anything in our letter, do please contact me on my mobile 07967 856 167.

Yours sincerely,


Chair,
On behalf of Gordon Mansions Residents Association.

