

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/2773/P	Joanna Bacon	28/06/2019 15:25:29	COMMEMA IL	<p>Pleased to support this proposal.</p> <p>The scheme should enliven the public realm around the buildings on all sides.</p> <p>Cleaning the existing façades will be beneficial to the area.</p> <p>Upgrading windows should improve environmental performance of the buildings.</p> <p>Overall this scheme should produce an enhancement of the character and appearance of local conservation areas and a listed building.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/2773/P	Covent Garden Community Association (Elizabeth Bax Chair of	30/06/2019 23:58:42	COMNOT	<p>Covent Garden Community Association (CGCA) has a number of comments to make on these proposals.</p> <p>In principle we support the refurbishment of Space House to a high standard as presented to us by the owners and their redevelopment team.</p> <p>In particular we support:</p> <ul style="list-style-type: none"> • The removal of the accretions around the ground floor that ruin the appearance of the building and hide key design features; the use of glass walls seems an appropriate solution to competing challenges of openness versus security. • The installation of openable windows and reduction of the need for air handling equipment. • The plans for ongoing cleaning to maintain the appearance of the concrete and glass facades. <p>We should also indicate that we are content to see the increase in height of the solid part of the tower building as shown in the drawings, as long as it does not rise above the current equipment line. This was an aspect of the design that gave us initial concerns. However, upon closer examination we realise that it is an opportunity to deal with an untidy roofscape that is visible from many parts of Covent Garden and even from across the river. Nevertheless, in order to deal with that problem once and for all, we ask you to attach a condition to any consent that would require any new plant / equipment / antennae etc. (indeed anything whatsoever) on the roof to be installed within the envelope that is currently being applied for.</p> <p>Having indicated our in-principle support, we must stress that there are operational details that could have significant impact upon residential amenity, and we ask you to attach conditions to any consent to mitigate this. Without such conditions WE WOULD HAVE TO OBJECT to the application.</p> <p>It should be noted that the site is very close to a large number of residential buildings. It has the potential to affect more than 100 flats in Wild Street Peabody buildings, where many families live (especially blocks A, L, M and N), as well as residents in Bruce House on Kemble Street. Dwellings a little further away, such as the 32 Flats at 10 Wild Street, will also be affected by servicing.</p> <p>We ask for the following conditions:</p> <ol style="list-style-type: none"> 1. Any use of the exterior forecourt for commercial activity to be restricted in time to 9am to 7pm Monday to Saturday and 10am to 6pm on Sundays. The owners have suggested a café use there, as well as discussing with us events such as film screenings and farmers' markets. 2. Use of the 500 person events space to be restricted in time to 8am and 10pm Monday to Friday, 9am to 10pm on Saturdays and 10am to 6pm on Sundays. We are disappointed that the applicant is suggesting a 1am terminal time, which is completely unsuitable for this area. Dispersal of persons leaving events after 9pm to be towards Kingsway. 3. Deliveries to be restricted a) in time to 8am to 8pm Monday to Saturday, 10am to 6pm on Sundays and b) in number to 50 per day Monday to Saturday, 10 on Sundays. The developers had told us that all deliveries

Application No: Consultees Name: Received:

Comment: Response:

would be restricted to 8am to 6pm, so we are disappointed that this is not reflected in the draft DSP.

4. Waste collections to be restricted in time to 8am to 8pm Monday to Saturday.

5. Lighting levels and location of smoking areas to be decided with the agreement of residential neighbours

Further comments relating to deliveries, servicing and construction are given below.

Servicing Proposals

The Transport Document (table 6.1) suggests that there will be an increase in servicing trips from 63 daily to 86 daily, an increase of 37%. The CGCA's view is that, given the planned reductions in road capacity in the area - from both Camden's emerging Holborn Vision and WCC's plans for Aldwych - it is untenable for a development located in between these schemes to propose increases in the demand for limited road space. Instead we would expect the applicant to be proposing measures which would reduce the number of servicing trips.

Our view is that the Council should cap the number of servicing trips at a figure which is lower than the current estimated demand – in our view 50 trips, and challenge the applicant to propose ways to achieve this. This reduced number of trips required needs to be secured by Condition.

Examples of measures which could be taken to achieve this include requiring office occupiers to have a single stationary supplier which would reduce the number of individual deliveries. Another measure for the office occupier would be either to ban personal deliveries or to require that they be delivered to a consolidation site which would then provide a consolidated delivery to the building.

The Draft Delivery and Servicing Plan (Appendix H of the Transport Statement) is poorly thought out and, if implemented, is likely to cause harm to residential amenity.

Our concerns are as follows:

a) It is proposed that servicing the site will start at 05:00. This means vehicles approaching and leaving the site at a time when residents in the area are asleep. Our view is that servicing activity at the site should not start before 08:00. If any servicing is required before this time it should be restricted to electric vehicles and any deliveries need to comply with TfL's Quiet Delivery Guidance and the fact that the deliveries can be made without causing a disturbance needs to be demonstrated in advance and then monitored. Similarly, deliveries should only be made until 20:00 unless the same measures are taken.

b) Part of the site is proposed to be used as an events space. Our experience is that for these types of space get-in and get-out often occurs in the evening before and after the event. This would be likely to disturb residents in the vicinity. The hours of deliveries and collections for the events space needs to be 08:00-20:00 as for the remainder of the building.

Application No: Consultees Name: Received:

Comment: Response:

c) The Draft DSP proposes that all vehicles access the site from the South along Kingsway. For vehicles seeking to deliver to the site from the West and South this may be possible but it will require significant additional distance along congested roads for vehicles delivering from the North and East. we would predict that these vehicles will use the network of streets to the West of the site to access it and so will be using narrow streets with large numbers of residents. The applicant has not provided any detail about how this will be managed so as to ensure that this can be done safely without disturbing residents.

The hours permitted for delivery and servicing should to be secured by condition, as should clear proposals for site access from directions other than the South.

Waste Management

The Waste Management Plan provides for storage in the basement area sufficient to allow waste collection to take place twice a week for all waste streams. This seems to be a sensible approach. Our concern is that the collection of the significant volume of waste generated is planned to take place "outside of the working hours of all commercial units". It is not clear what these hours will be. However waste collection, especially for glass, is an inherently noisy process and we would ask that times for all waste collection are limited to 08:00-20:00 Monday to Saturday and not at all on Sunday. Our view is that each waste stream only needs to be collected twice a week this can easily be managed.

These times for Waste Collection should be secured by Condition.

Construction Management Plan

The Plan provided gives no detail about how the Construction will be managed and it is therefore not possible to determine the impact on local residents or on traffic flow around the area as a whole. As this is a very congested part of London with very poor air quality we do not believe that the application should be considered and outline CMP has been provided which includes any proposed road closures, material storage requirements and information on vehicle numbers and routes.
