

Planning Application 2019 / 2772 / P

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17 July 2019

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Change of use 73 Farringdon Road

Thank you for the opportunity to comment on the above planning application which I saw on a notice pinned to a lamp post along Farringdon Road. I note that under article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 notice should be provided by letter drop to local residents. Da Vinci House is 20m from the proposed development and no such notice has been received.

This letter will set out several reasons why this proposal should be rejected based on non-compliance with local plans but before doing so it is worth setting out why the proposed development fails to consider the broader public realm that is shaping itself in the local area (within a 500m radius from the proposed development) due to:

- The introduction of CrossRail making this part of London a new 'epicentre' being one of the most connected parts of our great city and stimulating new higher end development (such as Bloom's redevelopment above Farringdon Station, No. 75 Farringdon Road, Cow Cross Street to name a few), supporting Clerkenwell as London's design capital and Hatton Garden as a thriving business district. Both TfL and LB Camden have stated publicly that CrossRail will be a major opportunity to improve the public realm around Farringdon, which is a key purpose of such a major public transport infrastructure program.
- Islington's upgrade of Turnmill Street, which in part runs parallel to Farringdon Road, on the east side of the railway line, and Cow Cross Street and Clerkenwell Green are good examples of the direction public realm planning in the area should be heading. Historical buildings are restored to their prime, with a fine mix of retail, residential and commercial development.
- The new plans for Smithfield Market and the City of London's Culture Mile, with the proposed relocation of the Museum of London, less than 500m from the subject development is a good example of the changing broader public realm of the area.
- Hatton Garden as a conservation area. The Hatton Garden Conservation Area Appraisal and Management Plan 2017 was created to guide planners to protect the area, along with its centuries old tradition of jewellery making, and ensure its history and context within the broader public realm are maintained.

Set within this context, Farringdon Road is now at a tipping point. On one hand Camden can set the direction of planning to create a public realm complementing the above, such as with developments like No. 75 Farringdon Road and Steelcase at No.77, and independent retail outlets such as Bert Frank, or head down the path of a fast food takeaway "strip" by approving this planning application for a Dominos Pizza takeaway, which would co-exist alongside existing takeaway outlets of Papa Johns Pizza and KFC, which would clearly undermine the cultural context of the area and the efforts made by TfL, Islington and Camden to improve the public real of the area.



Photo: Loose rubbish outside of KFC taken 08:07am 16 July 2019

Supporting the above context, the proposed planning application should be rejected on the following basis:

- Camden Local Plan Policy TC3 seeks to protect shops outside centres. The existing use is a silversmiths and is linked to the Hatton Garden Specialist Retail Area. Change of use to A5 will erode the possibility of future specialist jewellers occupying the site, eroding the character of the designated Hatton Garden Specialist Retail Area, resulting in unacceptable impact.
- The unit has been marketed for only 6 months for A1 use, this is not considered long enough to demonstrate that there is no demand for A1 units within this area. It must be fully demonstrated that the unit is no longer suitable for A1 use and the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time. 6 months is not considered to be an appropriate amount of time. The precedent set by independent retail Bert Frank at No. 67 Farringdon Road, would support the continuing demand for premise for A1 use.
- It should be noted also that the general state of the building has been poor, and as Camden Council is most likely aware some of the stone decorative façade fell to the street last winter. Although it would appear works are underway to rectify this, the poor maintenance may be a cause for the suppressed interest in A1 use. That must not be a reason to degrade the area further by changing the use to A5, rather the building owner should be encouraged to invest in appropriate maintenance to restore the building to an acceptable level to attract further A1 tenants.

Planning Application 2019 / 2772 / P

- Furthermore, the Camden Planning Guidance, Town Centres and Retail, states *“Where a planning application proposes the loss of a shop in retail use, we will consider whether there is a realistic prospect of such use continuing. The Council will generally require the submission of marketing evidence to show that there is no realistic prospect of demand to use a site for continued retail use. When applicants are providing marketing evidence the following information should be provided:*
 - *where the premises were advertised (shopfront; media, web sources etc.) and when (dates);*
 - *how long the premises were advertised for and whether this was over a consistent period;*
 - *rental prices quoted in the advertisement (we expect premises to be marketed at realistic prices);*
 - *copies of advertisements;*
 - *estate agents details;*
 - *any feedback from interested parties outlining why the premises were not suitable for their purposes; and*
 - *consideration of alternative retail uses and layouts.”*

This information has not been provided and the application cannot be determined without it. Further the recent lease of No.67 demonstrates there is a demand for property for A1 use.

- This section of Farringdon Road (between Clerkenwell Road and Greville Street) is undergoing change and is beginning to define itself as an important connection between the Hatton Garden Conservation Area, the redevelopment at Farringdon, Clerkenwell Green and linkage to the City of London’s Cultural Mile all of which are within 500m of the proposed development. The street frontage is changing. No 73 Farringdon Road will open soon as a high end commercial property. Bert Frank, the specialist independent lighting design company have recently opened at No. 76 Farringdon Road and already established itself as part of Clerkenwell Design week. These types of development are mirroring the changes Islington have made on Turnmill Street / Cow Cross Street, on the opposite side of the station. The proposed development is not at all in keeping with this direction.
- The impact of a third takeaway in close proximity to the St Alban’s C of E Primary School is a cause of concern. Many children may well use Farringdon Road to access the abundance of public transport. The cumulative impacts of Papa Johns, KFC and the proposed Dominos would have an unacceptable adverse impact on the health of children, failing to comply with Camden Policy TC4. Camden Planning Guidance Town Centres and Retail states *“The Council will request a health impact assessment to be undertaken and submitted to the Council for development of a new hot food take away where they will be located in close proximity to schools.”* This has not been provided.
- The impact of the road network has not been considered appropriately. The Planning, Design and Access Statement (P19 – 0834), incorrectly infers the proposed development as a place where people will visit to acquire hot food and fails to evaluate that most, if not all, the custom (as per Papa Johns at No. 65) will be by delivery by moped. This will result in significant increase in traffic compared with the current premises and hence breaches sustainable guidelines. Detailed assessment of moped movements needs to be undertaken to understand the impact on the road network, along with noise and other environmental impacts as well as footpath degradation etc.



Photo: 5 mopeds parked on footpath outside Papa Johns, 20m from the proposed Dominos (right side of photo) taken 18:22 15 July 2019

- Hours of operation of 10am to 5am is totally unacceptable in an area so close to residential properties (within the same building) and Da Vinci House, which is less 20m away. There is no justification as why it would have hours operation more than Papa John's Pizza (10am to 2am) which is only 20m away and is already a nuisance to local residents and footpath users with mopeds parked on the pavement and making noise throughout the day and night.
- Camden Local Plan Policy E2 seeks to secure and retain premises suitable for the general amenity of Hatton Garden and resist development of business premises and sites for a non-business use. Clearly this development does not comply with this policy. The policy also states that Camden will consider redevelopment of premises or sites that are suitable for continued jewellery workshops provided that:
 - the level of jewellery workshop space is increased or at least maintained;
 - the redevelopment retains existing businesses on the site as far as possible; and
 - the relocation of businesses will not cause harm to CAZ functions or Camden's local economy.This evidence has not been provided.
- Camden Local Plan Policy TC2 states that Camden will make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres. The proposed Dominos Pizza therefore conflicts with this policy. The policy also states Camden will support and protect Camden's areas of specialist shopping (which Hatton Garden is) and local shops. The development of this unit would not support and protect the Hatton Garden Conservation Area.

Planning Application 2019 / 2772 / P

- Camden Local Plan Policy TC3 seeks to protect shops outside centres. The existing use is a silversmiths and is linked to the Hatton Garden Specialist Retail Area. Change of use to A5 will erode the possibility of future specialist jewellers occupying the site, eroding the character of the designated Hatton Garden Specialist Retail Area.

Thank you again for the opportunity to comment on the proposed plan for the change of use from A1 to A5 at 73 Farringdon Road. We are at a unique point in determining the future direction of the public realm in our area and I look forward to following the planning process and participating at every opportunity.

Yours Sincerely

Erwan RAVEN

03 August 2019