

[REDACTED]

From: Jennifer Healey [REDACTED]
Sent: 23 September 2019 18:02
To: Planning
Subject: 15 Endell Street APP\PREMISES-NEW\097937

To Whom it may concern,

I am writing to to oppose the the planning permission (PP-07861471) for opening and the alcohol license application from Tesco at the above address.

I feel another supermarket in general will not benefit the area and will change the nature of the community massively. We already have two independent supermarkets that have been in business for 30+ years this will greatly hinder their livelihoods plus the fact of another Tesco already currently operating on King street.

We have a lot of antisocial behaviour occurring in the area currently, the access to "cheap booze" will have a major effect in this. There are various local pubs and restaurants that no doubt will also be affected should a license be permitted

A large part of Covent Garden has been massively gentrified over the last few years, Endell street remains one of the last few untouched streets with independent stores trading in harmony with the community and residents alike. A chain supermarket opening will incur noisy and inconvenient delivery schedules to an area that is already difficult to operate motor vehicle particularly HGV's.

I feel that the entire application to open this store has not been given enough thought and oppose the application for both the opening and licensing of the above premises.

Yours sincerely,

Jennifer Healey
Covent Garden Resident of 60+ years and 4 generations.

J Monahan



Camden Council
Planning Department
Development Control

23 September 2019

Attention: Samir Benbarek

Planning Reference 2019/3728/P

Dear Sir

43-47 Shelton Street & 15 Endell Street WC2H 9HJ

I wish to record my objection to the planning and advertisement applications made on behalf of Tesco for the following reasons.

Traffic Management/ Servicing

The applicants have not submitted any traffic management plan or details how they propose to service this site. Without such a study the application should not proceed as the ramifications of the likely disruption that will be caused to the traffic flow in this critical road junction in Covent Garden will have huge consequences to the quality of the conservation areas (both Camden's 'Seven Dials CA' and Westminster's 'Covent Garden CA'), and will result in seriously damaging the quality of the environment and amenity of the whole area.

This is contrary to policy A1 and A4 of Camden's Plan

Policy A1 "seeks to ensure the amenity of communities, occupiers, neighbours are protected."

The proposals achieve the opposite. Paragraph 6.3 states that "the Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts."

The applicant has done neither.

The Plan goes on to say in paragraph 6.8 " In instances where existing or committed capacity cannot meet the additional need generated by the development, we will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts. Any development or works affecting the highway will be expected to avoid disruption to the highway, to avoid congestion and protect residential amenity."

The proposals will cause major disruption to the highway, will result in considerable disruption and will substantially harm the amenity of residents.

The applicant has failed to provide any information as to how they propose to mitigate the disruption that a Tesco store on this site will cause.

In paragraph 6.9 goes on to say " Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes and avoid creating a shortfall to existing on-street parking conditions or amendments to Controlled Parking Zones. To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever

possible. Major developments dependent upon large goods vehicle deliveries will also be resisted in predominantly residential areas.”

Tesco stores require large goods vehicle deliveries and the proposed site of the Tesco store is surrounded by residential accommodation.

Clearly an on-site servicing facility is not feasible nor appropriate; the problem lies with the user, not the use class. Previous retail users caused no congestion problems being small low key and specialist traders characteristics sympathetic to the neighbourhood and to the conservation area. Tesco fails on all fronts and their occupation of these separate retail units being banged into one unit should be resisted.

The application makes absolutely no mention of how the Tesco store will be serviced.

There is no traffic analysis as to how the regular Tesco 11.5 m long delivery lorries (see photographs 1-3) will approach the store, how they will park to service the retail unit and how the lorries will leave the area. These lorries are all fitted with air conditioning/chiller units and the noise of these units is considerable and continuous while the lorry is making the delivery. This characteristic will further erode the local amenity of residents and the quality of the Conservation Area.

There is no recognition that the policy of Camden's West End Project will restrict access points to the neighbourhood and is predicated in reducing traffic and improving the air quality. There is no recognition that the retail unit is on an extremely busy corner where regularly traffic gets stuck causing long tail backs along Endell Street, Shelton Street and Bow Street and that it is impossible to turn a 11.5m lorry from Endell Street into Shelton Street , or for that matter from Endell Street into Betterton St and thence into Drury Lane, without causing major traffic disruption. Every week currently the bollard on the south corner of the junction between Endell St and Shelton St is knocked over by vans taking out the corner.

There is no assessment as to the adverse effect this user will have on the conservation area with regard to causing complete chaos to the traffic movement at this location. The Conservation Area Statement particularly draws attention that the existing quantity of traffic within the conservation area causes loss of amenity through congestion and pollution and that Camden's policies seeks to reduce congestion and the consequential poor air quality.

The proposal to put a Tesco store into this corner site will demonstrably worsen the amenity of both the immediate neighbours and residential accommodation that surrounds the site, and significantly worsen the traffic conditions on this critical road junction.

There are two disabled parking bays outside the retail unit in Endell Street and then a loading bay which is insufficient in length to accommodate the regular sized lorry that Tesco always use for their 'Express' stores so it is inevitable their articulated lorry will mount the pavement. The standard Tesco delivery lorry is 13m long when the tail gate is let down (photographs attached).

The closest loading bay on the same side of the road as the proposed Tesco outlet, is on the corner of Betterton Street just before the Cross Keys public house. The only way a Tesco lorry could endeavour to get into the loading bay is by reversing across the traffic flow from Betterton Street into the bay if the lorry approaches the retail unit from the south (via Bow Street or Long Acre), or if approaching from the north, down Endell Street by stopping just south of Betterton Street and reversing across Endell Street against the direction of traffic travelling north and south. In addition as the loading bay is not of sufficient length to accommodate the Tesco standard lorry, the pavement will be mounted, and once the trolleys are removed from the lorry there will be no available space for pedestrians to use the pavement on the west side of the street. The chaos that this will cause is clearly unacceptable and is totally against all basic planning policies that seek to ensure uses and activities are comparable with their immediate neighbours and environment.

The proposals fails to meet the planning policies D1(a) Respect to local context and character, D1(a) development should enhance the historic environment and heritage assets, D1(h) promote good health. The application will seriously damage health and cause increased stress levels by substantially increasing congestion and hence pollution and will cause considerable noise and damage to the local amenities. The proposals also will increase the likelihood of accidents to pedestrians as they will be forced off the pavement along Endell Street during deliveries and the size of the lorries will obscure the already dangerous pedestrian crossing of Shelton Street.

The loading bay is regularly used by other retail users in the immediate area and its time capacity is already fully committed. The idea of a large Tesco lorry waiting in Endell Street until the loading bay becomes free will cause immense traffic disruption so much so that any lorry trying to get out of the loading bay will not be able to do so as the traffic will pile up in Bow Street, Long Acre, Betterton Street, Endell Street and Shelton Street. The noise disruption, pollution and damage to the amenity will be horrendous.

Maybe it is not surprising that the applicants have not submitted a service plan and not undertaken any traffic analysis of the affect their servicing the proposed Tesco Express local store. What is really disappointing is that to date Camden Planners have not required such a study, and validated an application which is demonstrably deficient. If the Council proceed with the information provided to date it leaves itself wide open to legal challenge as demonstrably the Council could not have considered the implications of the application in the local context and in the how it conflicts with the Council's development standards.

I would suggest that Camden urgently instruct the traffic team used for the West End Project to report on the traffic implications if this application and this will require collecting data about the current, chaotic traffic problems that already exist in this location. In addition as this site is on the border with Westminster City Council, the views of Westminster City Council should be sought.

In addition to the regular Tesco lorries that will come to the proposed store will be other suppliers namely bakery and milk suppliers. These will be made early in the morning around 6 am, causing loss of amenity to the many residents living above and around the site by way of more disruption and will cause considerable noise as trolleys are wheeled to and from the retail unit entrance in Endell Street. These additional deliveries will also significantly add to the existing traffic disruption.

There is no mention in the application as to how the significant quantity of refuse that will be generated will be addressed; there is no refuse facility proposed within the unit, (compacting facilities is not practical as residential accommodation is directly above the unit). Presumably all rubbish will be taken out into Endell Street and either removed by the delivery lorries or by refuse collecting lorries. The former will extend the period the Tesco lorry remains in Endell Street, and will extend the noise and occupation of the public pavement which is very narrow at this point (1.7m from the shop front to the various street furniture/street signs, etc) , and the latter will intensify the disruption to traffic in Endell Street.

There is no analysis as to the significant danger that this user will inflict on pedestrians. As it is pedestrians, and there are many, find it extremely difficult to cross Shelton Street when walking along the west side of Endell Street. This will be significantly worsened especially when deliveries to the proposed store take place. This is because the empty wire pallets on rollers will be stored on the pavement by Tesco, (see the photographs attached) while the delivery takes place. The width of the pavement is only 1.7m wide in front of 15 Endell Street so there will be no room for pedestrians to walk on the pavement when deliveries are made. The size and length of the regular Tesco lorry that is used to service their Express local stores is some 3.5 m high so pedestrian's view of the street and traffic will be seriously restricted, assuming they have managed to navigate past the pallets being pushed to and from the store.

The application is completely silent on this aspect and consequence of their proposals. Clearly it will again adversely affect the local amenity and certainly will damage the quality of the appearance of the conservation area.

Conservation Area and Design

The Design and Access Statement that accompanies the application states that the application responds positively to the Conservation Area and suggests that the standard Tesco shop front design and ubiquitous illuminated signage will *"preserve and enhance the character and appearance of the building, the streetscape and the conservation area"*.

How the standard crude powdered aluminium shopfront design of Tesco's shops and signage that litters every high street in the UK could in any way be described as *'enhancing the quality and variety and special qualities of the conservation a hard to fathom*. It is Orwellian double speak. The homogeneous unimaginative sameness and deadening hand of a standard Tesco shop front design will take away any special qualities of the streetscape that the conservation area seeks to promote, and for any Design Officer in Camden to suggest otherwise would be a very sad day indeed as it would imply that mediocrity is acceptable whereas

Camden Plan Policy D3 says it seeks to achieve the highest quality of design especially in conservation areas.

The proposals have no regard to the local context, will seriously damage the conservation area and the setting of a number of buildings that make a positive contribution to the Conservation Area (the applicants fail to mention the site is surrounded by such designated buildings in their Design and Access statement as set out in the Conservation Area Statement page 20).

The applicant suggests that the removal of two of the large display windows in Shelton Street one to be replaced with black louvres, the other solid to cover the CO2 unit within, is acceptable as louvres are required in order to ventilate the plant that is required for the Tesco fridges and air conditioning. The Tesco standard shop unit is in effect determining the external appearance of the retail unit. The applicants say that the louvres are unfortunate but are necessary because of the nature of the retail user and because the plant room is justified as it will make it possible to remove the two small condensers that are at roof level.

These two very small units apparently have caused no disruption to residents and anyhow were only occasionally used due to the type of retail user at street level. The applicant fails to point out that the capacity and size of the plant that is required for the Tesco store is some 5 times greater than anything that exists at roof level and also includes large CO2 unit and air intake and extract fans neither of which exist at present. It is not surprising that almost a half of the street frontage along Shelton Street is to be replaced with black louvres. The Conservation Area and Camden Plan Design section D3 Shopfronts states unequivocally that the Council *"seeks to ensure that new shopfronts are of a high quality and sensitive to the area in which they are located. Transparent shopfronts (not blocked up shopfronts with black louvres) will be sought for units containing shops"*

The louvres will cover a large air extraction unit that will blast into pedestrians passing along Shelton Street and suck in traffic fumes to ventilate the retail unit. These facilities are directly under the terrace garden of the residential unit above. It will be unpleasant to walk past the plant room and certainly it is very detrimental to the quality of the streetscape.

The applicant further seeks to justify the new Shelton Street louvred shopfront by citing a recently approved application (ref 2017/1369/P) where existing timber louvres were replaced with metal louvres as part of the makeover of the Thomas Neal development in Shorts Gardens.

But the differences are considerable. Firstly the louvres proposed for Tesco's shop in Shelton Street do not currently exist whereas those in the Thomas Neal development have existed for over 20 years. The proposed louvres for Shelton Street will take out half of the street frontage of the retail unit in Shelton Street, whereas the louvres in Shorts Gardens represent about 10% of the street frontage with is very transparent, and most importantly of all the Shelton Street louvres are to facilitate large air extraction and intake fans and fridge condensers that will make considerable noise and will be most unpleasant to pass in front of when walking along Shelton Street. The louvres in Shorts Gardens are to give access to an electrical substation (no noise, no fans and no extraction just an emergency access point, and to a street cleaning store room which has no extraction or fans - see photographs 4 and 5 attached. The applicant's agents have clearly sought to suggest the louvres in both locations serve the same purpose, which they do not and that their impact on the conservation area is the same when clearly this is not the case.

On shop front design grounds alone the application should be turned down, as it clearly "will alter the character and have a harmful appearance on the conservation area".

If a user requires a level of air conditioning and plant that is inappropriate in its location, then it follows that the user is inappropriate for that location. The location should not have to accommodate the inappropriate intruder. For the past 40 years there have been a succession of users on the ground floor that have not required such a level of plant and if the units were to remain small and not unified or of a different retail type then this would continue. The Council talks about sustainability as being of prime importance. Agreeing to a scheme that requires a very high level of air conditioning and plant is not a sustainable approach. Tesco should be looking for premises that do not require such levels of plant which is possible as shown by recent Waitrose retail outlets.

The applicant have given no information as to the internal layout of the retail unit. The only plan submitted with the application shows an empty retail unit (drawing 17.058/10 Proposed Plan), but Tesco's retail unit

contain large shelving and rows of full height fridges and these generally run in front of shop windows. The layout of shop units should be designed to overcome the need for excessive window graphics, for example to hide shelving yet this is highly likely to occur. Without a layout plan of the retail unit it is not possible for the Council to consider whether the proposals will be in conflict with the Council's shopfront policies.

The Council should oblige the applicants to formally submit plans and elevations of their internal fit out so that it is possible to see how much of the unit will in fact be transparent.

Noise Impact

The applicant makes absolutely no mention of the noise impact Tesco's deliveries will cause to the immediate area, and no appraisal has been submitted to show what affect the servicing of this unit will have on the traffic flow and consequential noise generation. Congestion on this strategic corner junction is currently unacceptable and causes considerable noise, disruption and a loss of amenity to the many residents who live in Shelton Street and Endell Street. This will be significantly worsened with the arrival of Tesco.

Conclusion

The Council should turn down the application as it will damage the quality of the conservation area, seriously erode the quality of life and amenity of local residents, will worsen an already unsatisfactory congestion problem in this part of the conservation area, and the quality of the shop front design is poor, fails to meet the Council's policy of maintaining the vitality of streetscape and transparent shop fronts. The Council should also refuse the application for illuminated signage as it is completely alien to the streetscape in Endell Street and Shelton Street and certainly will damage the quality of the conservation area

Notwithstanding the above the Council should require the applicants to submit a detailed traffic management appraisal, and the Council should make its own independent appraisal especially in the light of its West End traffic plan, and require full details of the layout of the retail shop unit.

The application has so many serious ramifications to the shoe of Covent Garden it certainly should not be determined at officer level but should be considered by Committee.

Yours sincerely

J Monahan

Attached photographs 1-5 inclusive on two sheets



Photo 1



Photo 2



Photo 3

Photo 1 shows the standard Tesco delivery lorry used to service their 'Express' 'Local' stores which is what is proposed for the Endell St/Shelton St site. The articulated lorry is just over 11.5 meters long and approximately 3.4 m high

Photo 2 shows the tailgate down increasing the length by further 1.5 m giving an overall length of around 13 m

Photo 3 shows the plethora of trolleys stored on the street during delivery which will severely restrict pedestrian movement in Endell St. The active part of the pavement in Endell St is half the width of the width of the pavement shown in the photo. The lorries have chiller units so when stopped the noise emanating from them is considerable, in addition to the noise of the trolleys and such like.



Photo 4 This photograph of part of the Thomas Neal development in Shorts Gardens. The louvred door to the right serves the electricity substation and gives 24 hr emergency access and fresh air ventilation to the substation. The substation is noiseless and the extent of the louvre is plainly just a door width and there is no extraction/intake of air. The double louvred doors to the right give access to the store room of the street cleaning machines see photo 5 below.

The louvred fixed panels in the Shelton Street Tesco proposals are much longer, constitute about 50% of the street facade and facilitate the extraction and intake of fan assisted air into the retail shop and also ventilation to the very large condensers and CO2 unit required for the fridges inside the proposed Tesco shop.



Photo 5 The store inside of the louvred doors shown on the right of the Shorts Gardens street elevation photo 4 above (directly behind the pedestrian). There is no plant, no extraction and it is only used to store the pavement cleaning units. The space is only accessed during the working day unlike the plant room proposed in Shelton Street which will be operating 24 hours extracting air into the street sucking in noxious fumes from the traffic in Shelton Street into the unit and have a very large condenser serving all the fridges inside the shop, all directly below residential accommodation

The applicants seek to suggest the Shorts Gardens louvered doors serve the same purpose and are equally acceptable. They serve very different purposes and a hugely different is scale relative to Shorts Gardens and Shelton Street frontages/streetscape