

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/2773/P	Elizabeth Bax, Covent Garden Community Association	07/10/2019 23:02:19	OBJNOT	<p>Covent Garden Community Association (CGCA) is making further comments on these proposals, in addition to those that we made in June.</p> <p>In principle we support the revisions to the physical plans previously submitted. Our view is that the design revisions that Camden has encouraged the applicant to make are overall improvements.</p> <p>However, we are disappointed that the applicant has not addressed the most important operational concerns expressed by us and by residents directly in the revised application. Indeed, in the applicant's written response of 30/08/19, very little understanding is shown of the sensitivity of the site given its proximity to over 100 family flats in what is currently a very quiet corner of central London.</p> <p>The applicant's failure to address these concerns means that we must maintain our objection to the application.</p> <p>1. We asked that any use of the exterior forecourt for commercial activity (tables & chairs, events etc.) to be restricted in time to 9am to 7pm Monday to Saturday and 10am to 6pm on Sundays.</p> <p>The applicant responded that "hours of use of the exterior forecourt cannot be controlled through this planning application" and "necessary planning permission and listed building consent would be sought for any proposed events in the future".</p> <p>However, we believe that hours of use can and should be controlled through this planning application, and indeed that events could otherwise take place in the forecourt with no further planning or licence applications unless they were to continue after 11pm and involve payment for licensable services.</p> <p>Please attach a planning condition restricting hours of use of the outside forecourt to 9am - 7pm Monday to Saturday and 10am - 6pm on Sundays.</p> <p>2. We asked that use of the 500 person events space be restricted in time to between 8am and 10pm Monday to Friday, 9am to 10pm on Saturdays and 10am to 6pm on Sundays.</p> <p>The applicant responded that "The application proposes flexible opening times for the event space between 07:00am through to 01:00am the following day, Monday through Saturday. Sunday events will start at 8am and cease at 10.30pm."</p> <p>We believe that these hours will be seriously damaging to residential amenity. 1am is totally unacceptable in this location.</p> <p>We ask that you please attach a condition restricting hours of use of the events space to 8am - 10pm Monday to Friday, 9am - 10pm on Saturdays and 10am - 6pm on Sundays.</p> <p>Alternatively, please ask the applicant to revise plans to use this space as B1.</p>

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3. We asked that deliveries and servicing be no earlier than 8am Monday to Saturday and 10am on Sundays.

The applicant responded that "It has been agreed with the Environmental Health Officer (EHO) that deliveries will be restricted to the following hours for each land use: Flexible A1/A3 use: 7am - 6pm, B1 office and B1/Sui Generis use: 8am – 6pm."

Notwithstanding any discussions held between the applicant and the EHO, Planning is a different matter. 7am is too early to start deliveries in a residential area as is clearly acknowledged in Camden's Local Plan.

Policy A4 - Noise and Vibration, paragraph 6.104 suggests that, to manage potential noise issues, conditions will usually be applied to require deliveries, collections and the loading and unloading of goods and refuse to take place after 8am. It is doubly disappointing to have the applicant respond in this way because he clearly stated to us at a presentation in June that all deliveries would be restricted to 8am to 6pm.

Please attach a condition restricting hours of deliveries and servicing to 8am – 6pm Monday to Saturday and 10am – 6pm on Sundays.

4. We asked that deliveries be restricted in number to 50 per day Monday to Saturday, 10 on Sundays. The applicant has made no firm commitment to reduce the number from 86 daily so we ask that you limit this by making any planning consent conditional upon an acceptable Servicing Management Plan (SMP) that contains this maximum number of trips.

5. We asked that waste collections to be restricted in time to 8am to 8pm Monday to Saturday.

The applicant responded that he is "seeking for collections to take place from 7am – 8pm". As in our paragraph 3 above, this is too early. Please attach a condition restricting hours of waste collection to 8am - 8pm Monday to Saturday.

Please also note that there is no relevance to the applicant's repeated remark that "It should be noted that Westminster City Council states that collections can take place from (neighbouring road) Wild Street for the Peabody Buildings from 07:00, and London Boroughs widely allow for collections to take place between 7am – 11pm in line with 'Noise nuisances: how councils deal with complaints' guidance."

Firstly, the refuse collection for Peabody buildings in Wild Street is around 8.30am. Secondly, there is no comparison between the disruption caused by deliveries and collections at a residential estate with a development such as Space House which envisages 86 trips per day! Thirdly, it is worrying that the applicant resorts to quoting guidance related largely to statutory nuisance; the levels of noise required to trigger this are very high and difficult to prove, so it needs to be avoided at the outset by condition or by design.

Finally, we ask that you involve stakeholders in elements of the Construction Management Plan (CMP) that

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may affect them. We have in recent years had serious problems with developments in and around the Newton Street area (just two blocks away from Keeley Street) as a result of CMPs that were difficult to enforce. Things were so bad that a public meeting was called in September 2018, attended by several senior council officers including David Joyce. The authorities undertook to learn the lessons of those developments and we suggest that Space House is an opportunity to demonstrate positive change.
