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**From:** Jim Monahan [REDACTED]  
**Sent:** 12 January 2020 20:38  
**To:** Sild, Thomas  
**Cc:** [REDACTED]  
**Subject:** 43-47 Shelton Street/15 Endell St Ref 2019/3728/P and 2019/3741/PA

I am sending my observations to the report going to the Members Briefing again with spelling and typos corrected

Dear Thomas Sid

Tesco's Shelton S/Endell St WC2

I have read your report that is going up to members briefing that I understand is being considered on 13 January.

I understand that I must contain my comments to matters of fact and misinterpretation of Policy.

I would point out the following facts that are incorrect.

1.Representations.

I wrote a long objection dated 23 September that has not been included in record of the representations received. You knew of my representations as we spoke on the phone a number of times yet no mention of its existence and consequently its content has been reported.

The committee should be aware of my representations and the points that I raised should be acknowledged and discussed in the report. This has not occurred.

2.Louvres

The report states that the proposed louvres at street level along Shelton Street that are proposed to replace a clear and transparent shop front are not uncharacteristic of the area and anyhow louves exists in the Shelton Street facade. This fails to point out the existing two louvres are very small, and that the Council's planning policy especially the conservation area policy ( D3 Shopfronts) *"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 report also fails to report to members that the existing two small louves are not connected to any plant merely acting as ventilation 'air bricks' one provides fresh air to the existing refuse store serving the flats above and the other to ventilate the lobby to the residential electrical intake cupboard. The proposed 2.3m high by 4.8 m long louvre, which represents over a half of the total shop front frontage in Shelton Street, will cover a large air extraction unit that will blast air into pedestrians passing along Shelton Street and suck in traffic fumes to ventilate the retail unit. No mention is made of the material difference of the existing and proposed shop front design in Shelton Street.

The proposed louvres are directly under the terrace garden of the residential units above. It will be unpleasant to walk past the plant room and certainly it is very detrimental to the quality of the streetscape and very undesirable for the residential accommodation above. The report fails to record that the application fails to address Council Planning Policy A1 that states the

Council "*seeks to ensure the amenity of communities occupiers, neighbours are protected*". The report makes no mention of this policy nor D1(a) that requires development to respect local context, and similarly D1(h). Indeed the report makes no mention of any planning policy merely relying on the fact that as the existing use is established the Council can not do anything, and presumably therefore fails to mention what Planning Policies the applications are contrary to.

The applicants acknowledge that the huge louvres in Shelton Street are unfortunate (their words) in their Design Statement, but say it is necessary for their type of activity. So in effect the nature of the user will determine the shop front design and that is is unfortunate but just has to be accepted. The officer's report does not draw attention to these facts. Your report makes no mention of this fact.

### 3. Noise

The residential flats have no secondary glazing let alone double glazing that is stated in the report. All the residential accommodation has single glazed windows. The implication of the report is that any possible additional noise from the trading and from the unit will be mitigated by the double glazed units and that anyhow the street is noisy so Tesco will make no difference. The report is deliberately obscure by the fact that it does not give any information as to when Tesco's propose to be open. Tesco propose to operate from 6.00 am till 21.00 hours every day of the week except Sundays. The increased intensity of use, the much larger door openings (another fact not included in the report) and the refusal of the applicants to take any steps to ensure there is better noise attenuation between their unit and the residential accommodation above proposed by the applicants (again not mentioned in the report).

### 4. Servicing.

The Council have received no details from Tesco as regards to their service plans; the applicants say they will abide by the Traffic Regulation Order that only applies to the service bay. As Tesco propose to service the unit out of the permitted loading bay times this implies that there will be no controls as to when deliveries are made and how. Moreover the report is silent on how the retail unit will deal with its refuse. In my letter of objection I provided a photograph as to how Tesco currently deal with their refuse in their other store in Covent Garden in Bedford St New Row. Refuse is stored in their wire cages on the pavement and when empties the wire cages remain on the street. The applicants have given absolutely no details as to what storage facilities will be provided within the retail unit, and the Council have not requested any such details again not reported to Members in the report. No undertakings have been sought let alone given as to how they propose to deal with their rubbish. It will be left in Endell St within their wire trolleys until a delivery comes by. The pavement is only 1.7m wide.

None of these facts have been reported to Members in the report let alone the photograph of how Tesco currently deal with their rubbish in their nearest Express outlet in Covent Garden.

It is extremely disingenuous for the planning report to state that other departments of the Council will deal with any problems resulting from Tesco being granted planning permission. Firstly because there is no obligation on the part of the Council to take action and secondly as all Members know the resources of the Council are stretched to their limit that to take effective steps will just not occur especially as the route cause, namely Tesco's occupation of the retail unit is entirely inappropriate to this location.

### Conclusion.

Either no site inspection has occurred or when it occurred the officer concerned was not very observant. The residential accommodation is not double glazed, the existing louvres are tiny and are not attached to any extraction or intake fans and the new shop front door is significantly larger than that which currently exists.

The report fails to accurately fully report on responses, and the report fails to report on the relevant planning policies that are not being met by the current application.

The application should be referred to the development control committee where it belongs considering the number of comments received. The Council claims it wishes to make decisions in a transparent manner. Not

to refer the matter to the development committee implies that transparency should only apply when the Executive decide.

Yours sincerely

Jim Monahan

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