

<b>Application No:</b>	<b>Consultees Name:</b>	<b>Received:</b>	<b>Comment:</b>	<b>Response:</b>
2020/4550/P	Jim Monahan	18/11/2020 18:05:02	OBJNOT	<p>Attention: Nora Andreea Constantinescu Camden Development Control, Planning Department 5 Pancras Square, London N1C 4AG</p>

By post and email

18 November 2020

Your Reference 2020/4550/P

Dear Nora Andreea Constantinescu

Re: 183 Drury Lane WC2B 5QP

I live in Goldsmith Court that is located on the north corner of Drury Lane and Stukeley Street; 183 Drury Lane is located on the south corner of Drury Lane and Stukeley Street.

This end of Stukeley Street is pedestrianised, and is in predominantly in residential use; all the properties either side of 183 Drury Lane (and above the retail unit), both in Drury Lane and Stukeley Street are also in residential use. The immediate neighbourhood contains an extremely high concentration of residential accommodation. Stukeley Street is a quiet cull de sac that links with Macklin Street and is very narrow where it meets Drury Lane. The physical nature of this section of Stukeley Street results in the amplification of pedestrian noise into the residential accommodation that overlook the street

The property is within the Seven Dials Conservation Area. The Conservation Area Statement describes 181-183 buildings as positively contributing to the Conservation Area's street scene ( see page 16 'Sub Area Three' and page 20 'Buildings Which make A Positive Contribution').

The Conservation Area Statement makes clear that the Council intend to protect the residential amenity and that there will be a presumption against additional A3 uses. This is because of the associated amenity problems that occur as a consequence of the close proximity of residential properties and the effect additional A3 uses would have on the overall character of the Conservation Area.

Camden's Local Plan recently adopted in 2017 contains a number of Policies that seek to protect the amenity of existing residential accommodation. Policy TC2 (c) states that the Council will make sure food, drink entertainment and other uses do not have a harmful impact on residents and the local area and concentrate such uses to Euston and Kings Cross Growth Areas and TC2 (d) seeks to support and protect local retail uses in Neighbourhood Areas. Drury Lane/Covent Garden is such an area. Policy TC2 (e) states that the council will pursue the planning objectives set out in their supplementary planning Guidance. The proposed change of use from Sui Generis retail use to A3 take away unit as is proposed does not comply with these policies.

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In particular paragraph 9.23 the Council states the Council: “will resist schemes that would result in less than half of ground floor premises in a neighbourhood centre from being in retail use or in more than three consecutive premises being in non-retail use”

If a change of use to A3 were permitted to 183 Drury Lane then there would be three consecutive premises in non retail use as numbers 184,185 and 186 are all in A3 use and no 186 also has a take away service the latter already causes considerable amenity problems and disturbance. To approve a further A3 use especially a take away facility, in this location will exacerbate the problems of conflict between A3 uses and the residential amenity. The Local Plan sets out clearly in para graph 9.39 that the Council will seek to prevent concentrations of uses that would be harmful to an area’s attractiveness to shoppers and its residential amenity. The planning application for 183 again is contrary to this objective.

In the recently revised supplementary planning Guidance “Health and Wellbeing” the Council make clear that they will resist new take away facilities that are within 400 m from existing primary and secondary school. No 183 Drury Lane is about 185m from St Josephs Primary School so clearly is contrary to this planning policy as well.

Turning to the actual design, it is proposed to provide an extract flue on the external elevation running along Stukeley Street and to clad the flue containing fans with pastiche brick slips on a cementitious board (see Design and Access statement page 3),. This proposal is extremely crude and will be out of keeping with the existing brickwork having the wrong brick bonding, colour and of a bizarre and crude design. Moreover the protrusion of the flue on this elevation will certainly not be sympathetic to the existing building. The proposed flue’s closeness to adjacent residential windows that serve habitable rooms will without question cause disturbance especially considering the hours of opening of the proposed take away. The proximity of the flue will require the windows to be always closed which is an intolerable consequence of the proposed food take away facility.

The drawings do not indicate where the air intake fan will be located despite the fact that Ventilation and Extract Statement that accompanies the application states under the sub heading ‘Make Up Air’ on page 1, that additional ductwork will be required and a new external air supply vent. Neither do the drawings show where the Electrostatic Precipitators will be located ( it is a very large piece of kit with dimensions 1230 width x 534 height x 620 long) and it appears from the report that the expected noise of the extracts will be in excess of 67 db which does not comply with Council environmental standards.

The application includes a completely meaningless drawing (Proposed Acoustic Detail no 18-BC-309). This drawing presumably purports to show how the new A3 use will provide adequate sound insulation between the ground floor take away A3 use and the residential accommodation directly above. The drawing gives no details of the floor construction, nor any details as to how the sound insulated board is to be fixed to the underside of the floor that separates the uses. If it is simply screwed to the ceiling it will give minimal sound separation. No details are given as to what the board is made of all we are told is that it is to be 120mm thick. Both airborne and structural transference of sound requires very careful detailing, and the inclusion of the banal drawing indicates that none has been applied.

The problem is that unless the applicant makes the separation between the ground and first floor of a very

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dense and thick material like concrete or provide a separate very thick and deep false ceiling under the existing (there is not sufficient headroom), no effective sound insulation can be in fact provided. The drawing is a con, endeavouring to tick a box containing the minimum of information and will none effective and totally unenforceable.

Stukeley Street suffers at night with a great deal of anti-social activity; there is a history of drug abuse in the street being 'off the beaten track' and the addition of a take away service operating up to 10pm very night and up to 11pm on Saturdays will inevitably result in more noise and disturbance. The pavement outside 183 is extremely narrow and the inevitable delivery scooters that will gravitate to the takeaway have nowhere to park other than on the pavement outside 183 which is not practical due to its width. What will actually occur will be that delivery cycles and scooters will shoot up Stukeley Street and park on the pedestrianised section beside 183 Drury Lane in Stukeley which is directly in front of the entrances to Goldsmith Court and 4,6 and 8 Shelton Street all which have residential use at street level.

In summary this application should be rejected. It is blatantly contrary to Camden's Planning Policies and if granted will cause enormous disruption and conflict with the amenity of the residential accommodation that surrounds the property. Such a use will do damage to the visual appearance of the Conservation Area and will further erode the retail quality of the top end of Drury Lane which is designated a local shopping area.

Yours sincerely.

Jim Monahan  
Flat 5 Goldsmith Court  
Stukeley Street  
London WC2B 5LF

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2020/4550/P	Jim Monahan	18/11/2020 18:11:40	OBJNOT	This is a corrected version of my objection sent previously

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