

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/4550/P	Covent Garden Housing Co-op	04/12/2020 17:13:16	OBJ	<p>Attention: Nora Andreea Constantinescu Camden Development Control, Planning Department 5 Pancras Square, London N1C 4AG</p>

18 November 2020
Reference 2020/4550/P

Dear Nora Andreea Constantinescu,
Re: 183 Drury Lane, London, WC2B 5QP

We are a small local housing co-operative who run the day-to-day management of 55 tenanted properties in the Covent Garden area. One of our residential blocks is Goldsmith Court (which is located on the north corner of Drury Lane and Stukeley Street). We also have a 1 bedroom flat located at 182 Drury Lane. The end of Stukeley Street leading up to 183 Drury Lane is pedestrianised and is predominantly in residential use. Stukeley Street itself is a quiet cul-de-sac that links with Macklin Street and is very narrow where it meets Drury Lane. When it occurs, pedestrian noise bounces between the residential properties that overlook the street, it is really not a location where we should be encouraging footfall from people queueing or sitting around eating takeaway food.

Covent Garden as a whole, but Drury Lane and Stukeley Street in particular, experience a lot of anti-social activity; there is a history of drug abuse and drug dealing in Stukeley Street, and the north end of Drury Lane and the addition of a takeaway service operating during evenings will inevitably result in more people 'hanging around' – again something we need to discourage.

The Deliveroo and UberEats cars and scooters that will pick-up from the takeaway have nowhere to park, as outside the shop is already used by residents parking and pay and display spaces. Their only option from what we can see will be to park on the pavement outside 183 Drury Lane which aside from being illegal, is not practical due to its width. However, what these delivery folks will likely be forced to do is park on the pedestrianised area at the top of Stukeley Street and in order to do so, they will need to drive down Macklin Street (where there is a nursery and Primary School and up Stukeley Street to the pedestrianised section beside 183 Drury Lane which also happens to be the area where the entrance to Goldsmith Court is. Delivery drivers doing 30mph, whilst checking their phones / GPS will make it incredibly unsafe for children leaving school on Macklin Street.

Goldsmith Court is a block with a high concentration of elderly, and disabled residents (it is our only local block with a lift). Taking that into consideration, we do not agree that a food takeaway unit is a suitable fit for the well being and health of our residents.

It should also be noted that directly opposite 183 Drury Lane there are 2 large flights of steps leading up to a budget Hotel, which during both lockdowns has attracted street people. Being homeless, and having no tourists to beg money from has meant they are congregating on the steps where they eat, drink alcohol, and make a nuisance of themselves.

When out of lockdown, the stairs will be the perfect place for people to sit and eat their takeaway food, which in turn will become a junkyard of discarded food packing, thereby attracting rats and mice to an area already highly populated with food outlets.

In summary, the Covent Garden Housing Co-op believe this application should be rejected. If granted it will cause enormous disruption to the residents within the vicinity. Let alone its visual appearance in what is a

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				"Conservation Area".
				Yours sincerely,
				Nina Atkinson
				Executive Committee Member & Committee Secretary

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/4550/P	Covent Garden Community Association (Elizabeth Bax, Chair of Planning Subcommittee)	06/12/2020 23:27:32	OBJNOT	<p>Covent Garden Community Association (CGCA) objects to this application.</p> <p>The application form is for A3 use with opening hours as follows: Mon – Fri 10:00-22:00 Sat 10:00-23:00 Sun 11:00-22:00</p> <p>However, it is clear from the plans and from the Design & Access Statement that the operation would, in fact, be A5 hot food takeaway use.</p> <p>Reasons for this inference include:</p> <ul style="list-style-type: none"> - The plans show only 8 chairs at 2 tables, in an area that is no larger than the area shown for Doner kebab food preparation and counter sales. - The application form states 3 full time and 2 part time staff, which are far more than would be needed to service 8 covers. <p>It is important that food & drink operations in this area do not spill over from A3 restaurant to A5 takeaway use. Very close by, an A3 unit 174 Drury Lane became a smelly A5 kebab operation that caused distress to residents for years before eventually being enforced against and returned to its proper café use after a planning appeal in 2010. It is those same residents, and more, who would be affected by this unit.</p> <p>An additional reason for refusal of A5 takeaway use applies to this site, being 172 metres from St. Joseph's primary school on Macklin Street. The London Plan (Intend to publish version) states in Policy E9-D that: "Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school."</p> <p>-----</p> <p>If the operation were to be changed to a genuine A3 use, we have further objections that relate to any form of A3 use in this densely residential area. The applicant seems unaware of this context in his Design & Access statement, which refers to Stukeley Street as an 'Alleyway'. It is, in fact, a historic street with predominantly residential frontages at the Western end where the application site is located. There are 16 flats overlooking the doorway of the application site at Goldsmith Court alone, with more dwellings both next door and further along the street.</p> <p>With the advent of Class E, it is therefore important that this unit remains in an appropriate Sui Generis use.</p> <p>-----</p> <p>We object to the extraction system proposed, whatever the use class. Rather than install a system with exterior elements that can have negative impact on surrounding buildings, their occupiers and the immediate area (including the Conservation Area), we believe that a recirculating extraction system would be preferable, requiring no equipment to be located outside the building. We give this example of a provider, but there may be newer & better ones available:</p>

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<https://www.premierrestaurantengineering.co.uk/canopyairrecirculationextractor.html>

If, however, the LPA is satisfied that there is no alternative but to install a replacement external extraction system at this site, then we ask for fuller plans, and for conditions to be attached to any consent to protect the occupiers of neighbouring buildings. We suggest some possible text below.

In addition to the council's usual requirement upon noise levels near to sensitive facades being at least 10dB(A) less than the existing minimum background measurement we ask that:

1. Prior to use, machinery, plant or equipment and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such for the lifetime of the development. After installation, tests shall be carried out to assess noise and vibration levels, to check that the equipment is working as planned.
2. Prior to use of the development, details shall be submitted to and approved in writing by the Council, of a suitable cleaning schedule and/or maintenance contract for the intake, extract and odour control systems. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained. A maintenance report for the equipment shall be submitted for approval each quarter, and compliance of the same in relation to vibration, odour and noise. Reports shall be made available to the public by the freeholder on request.
(The reason for this is that, in our experience, the need to maintain equipment can become a low priority for operators over time. Yet it is always better to prevent problems rather than trying to deal with them for years afterwards. Quarterly checks are the recommended industry standard. Regular cleaning also reduces the risk of fire.)
3. All equipment shall be turned off outside the hours at which the premises are open to the public, but in any case not to operate outside the time window of 9am to 10pm each day. Equipment shall have an automatic, timed switch to achieve this.
(The reason for the timer is that there have been problems in the area with staff leaving equipment on all night. At some hours this area is dead quiet, which means that equipment which passes noise tests at other times becomes a nuisance later, when neighbours are trying to sleep.)
4. No odour from the premises to cause public nuisance.
(The reason for this is that, in our experience, mechanical testing for odour is fraught with difficulty. We have had residents feel very sick, day after day, because of the smell of cooking from restaurant extraction systems elsewhere in the area. Yet in all those cases the EH officers were unable to achieve calibrated readings sufficient to show nuisance. In one case a couple had to move house just as they were preparing to have a baby. In another case nearby in Drury Lane, day-long extraction smells compounded the distress of an elderly lady suffering from cancer who was unable to move.)

We ask you to refuse this application.