Application No:	Consultees Name:	Received:	Comment:	Response:
2021/0244/P	Kenton Price	08/05/2021 16:42:16	OBJNOT	My bedroom overlooks the proposed holiday flats.
				I strongly object to the late-stage change of use after the rest of the building planning was approved. It is as if the developer is trying it on.
				We really do not need more holiday flats in this highly residential part of Covent Garden. They will disturb all of us in Fielding Court and Tower Court.
				Why can the flats not be restricted to members of BRC? Why are they to be publicly bookable party flats? This will be a disaster in this special policy area of Seven Dials.
				If you allow this to go ahead, please do not allow the gate to be used by the holiday flats. The gate was permitted only for cyclists, it now has scope creep. Entry and exit should be via the main building.

Application No:	Consultees Name:	Received:	

2021/0244/P Richard Friedhoff 09/05/2021 19:55:51

Response:

Comment:

INT

I am among the neighbors most directly affected by this proposal. A major concern is the surge in using rented dwellings in this neighborhood for commercial all-night raves, complete with deafening noise, illegal drug transactions and use, and anti-social behavior including noisy partying, intimidation, fighting, urination, and public indecency. Thus, I would hope that the council would discourage this possibility with all their decisions on this application.

I would note that in selling the original application for the larger site to myself and my neighbors, the applicants promised that #2 Tower Court was going to be sold to an individual homeowner as part of their redevelopment project. This seemed like a good use of the property to many of us, and helped generate support for their proposal. Thus, this dramatic change suggests that we should do everything possible to require, rather than to assume, good and neighborly stewardship of the property.

I support the following suggestions, initially proposed by some of my neighbors, in some cases with my own slant or modifications, who are also concerned about defending the threatened character, and livability, of this residential neighborhood.

Maximum Occupancy Level

The applicants propose two short-term one bedroom flats. This suggests that it is reasonable, to limit each flat to a maximum four person occupancy, two in the bedroom, and two on the sofa.

Affiliation with British Retail Consortium

Use permitted only by groups that include at least one member of the British Retail Consortium. During the application process, we were told that if the building was not sold, it would only be used for visitors to the BRC. Now, that this promise has been revised, would it be too much to ask them to rent it only to affiliated parties? Do commitments mean nothing?

Access

Access between 23:00 and 7:00 only through the main building, rather than the gate. If the renters are not deemed reliable enough to transit through the owners' own entrance, they should not be dumped on us, and required to enter and exit through our alley which is often deserted at night.

24 Hour Hotline

Neighbors should be provided with a 24 hour line to the security service of the British Retail Consortium. If problems of noise, anti-social behavior, drug use, etc., persist despite reporting, applicants should be subject to review of any short-term letting status. It should be conditional on continuing adequate performance. They have already taken advantage of our goodwill with this application which completely contravenes their earlier promises.

The principal users of the main building are not going to be there at night. Thus, nighttime noise, anti-social behavior, and all the rest will not affect them. Their nighttime absence should, however, not absolve them of their responsibility to their neighbors who do remain overnight. This eleventh hour change of purpose of the building suggests that the council should not rely upon goodwill, or promises, but rather should seek to codify clearly what is required, and to provide recourse for neighbors should further promises be broken.

				Printed on: 10/05/2021
Application No:	Consultees Name:	Received:	Comment:	Response:
2021/0244/P	Covent Garden Community Association	09/05/2021 22:52:28	OBJNOT	Covent Garden Community Association objects to this application in principle. However, if the LPA is minded to grant consent then we would suggest planning conditions to protect nearby residential amenity.
	(Elizabeth Bax, Chair of Planning Subcommittee)			
				The property has consent for C3 residential dwelling use under 2019/2525/P. We welcomed this use at the time of application, but warned against the subdivision of the little house into 2 small units because:
				"Unfortunately, we find in this area of the West End that small 1-bedroom dwellings tend to be used as second homes and / or rented for holiday lets, neither of which supports our local community well. The latter use can cause enormous problems to their neighbours, as the planning authority is well aware. Even if let short-term only for the total legal limit of 90 days, the turnover of guests in holiday mood can severely diminish neighbouring residential amenity. The building would make a good 3 - 4 bedroom home for permanent residents, which we believe would be more appropriate in this location."
				It is to be regretted that the subdivision of the little house has resulted in an application for just the sort of 'short let' use that we feared.
				We cannot support this change of use because there is a housing crisis and people desperately need primary homes. Property prices in the area have been inflated by the holiday let market, which brings in income far above that of family dwellings and prices-out long-term tenants. The holiday let market therefore chips away at our community.
				However, if you are unable to ensure that the property will be used as family home/s then we accept that a well-managed short-let arrangement may be the next best option, as long as it is run as a proper serviced apartment business for vetted clients. In this area we are all too familiar with the fallout from holiday lets that are not properly managed, for example those marketed via websites such as AirBnB where neighbours' lives can be made a misery.
				As you know, the property is located in a very quiet, entirely residential enclave at the back of Seven Dials. It is faced by houses all along Tower Court, and the block of flats called 'Fielding Court' backs onto it. Many family dwellings will be affected by whatever happens at the property.
				The alleyway between these buildings is narrow, and there is no background noise from traffic or anything else at night except the birds behind the old school. Every sound echoes. It is therefore very important that any short lets are managed in such a way as to minimise noise impacts in particular.

After discussion with those most likely to be affected, we would ask for the following conditions to be attached to any consent for change of use to Short term let flats (Sui Generis) so that it becomes, effectively, managed accommodation for members and their guests in the style of many London clubs:

Application No: Consultees Name: Received: Comment: Response: 1. Lets to be managed directly by the British Retail Consortium without the involvement of any sub-agents or listing on any holiday letting websites such as AirBnB. 2. Bookings to be permitted only to groups involving at least one member of the British Retail Consortium. Bookings to be limited to groups of no more than 3 people per 1-bedroom flat. 3. 4. Access for guests via the gate to be within the hours of 7am to 11pm at most, and via the main building at night. No noise to emanate from the building from instruments, electronic devices etc. 5. 6. The provision of a telephone line providing a 24/7 response to any complaints from the public. (The main building will presumably have 24/7 security which can be used for this.) It is indeed sad that the old 'Schoolmaster's House' cannot be maintained as a family home. However, with the addition of the above conditions we believe that the property can at least be enjoyed by responsible guests in a way that does not harm the amenity of its close residential neighbours. -----