

**Consolidated/St Giles planning application 2012/6858/P
Denmark Street & St. Giles**

**Comments from: Bloomsbury Association; Covent Garden Community Association; Seven Dials Trust and the Soho Society
17 03 2013**

<http://www.britishpathe.com/video/tin-pan-alley>

Pathé News 1951

https://www.youtube.com/watch?feature=player_embedded&v=jK14QfTebVY

David Bowie 1965...

Consultation:



All those involved thank Consolidated for their assistance, presentations and thorough answers to questions we submitted. We only comment on issues of concern.

As with the Centrepont proposed development (Almacantar) we recognise the need for action in this area. We support the general points made by Sir Terry Farrell in the Executive Summary to his '*St Giles Circus Strategic Framework Study*' (2008). Also the points made by the Mayor of London in his introduction to same: '*I particularly welcome the proposals of improved pedestrian links between St.Giles Circus and nearby Covent Garden as well as the British Museum. This is to help get Londoners and visitors as quickly and conveniently as possible from one destination to another. The creative reworking of this neglected area in the West End will play an important part in helping London to remain the world's number one location.*'

Housing & Retaining & Enhancing the Denmark Street Micro Economy:



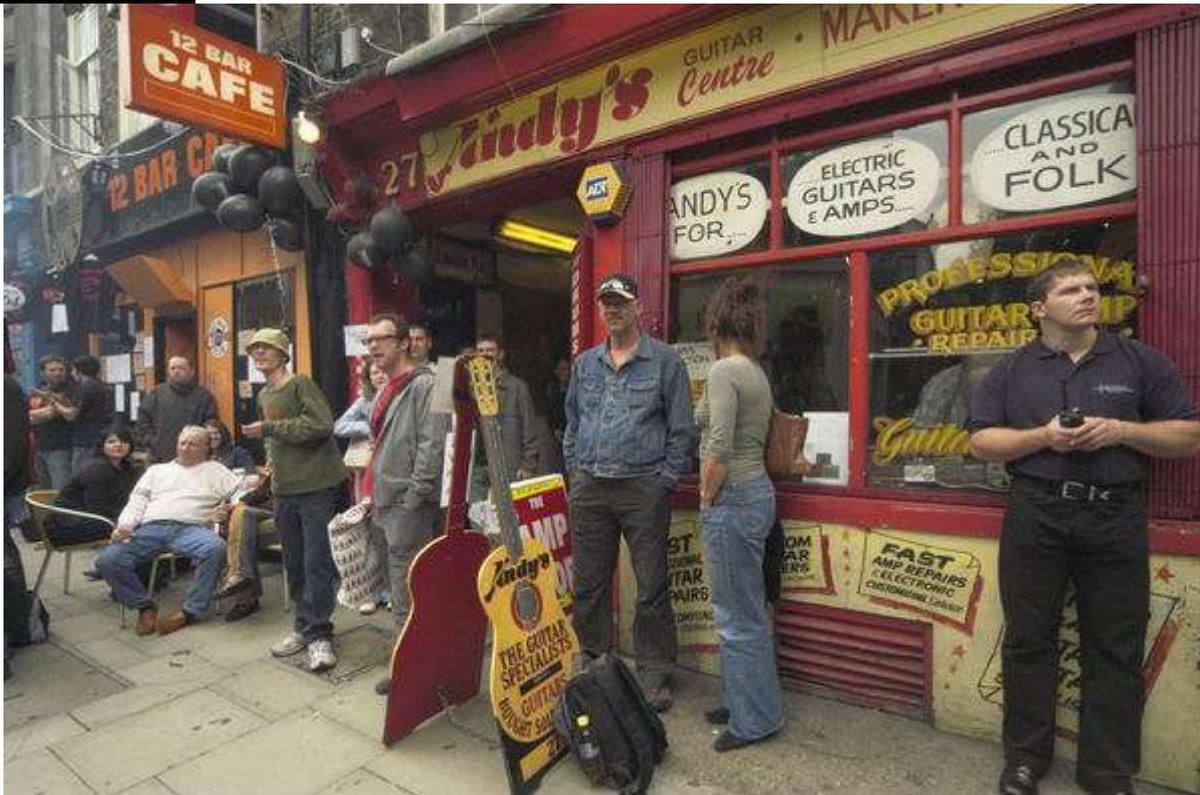
We are concerned that the private housing does not end up as a form of serviced apartments. Assured tenancies (AT) and assured short hold tenancies (AST) are the two ways private housing is now let. Assured tenancies give tenants security unless a landlord can prove to a court grounds for possession. With assured short hold tenancies the landlord can regain possession six months after the start of the tenancy subject to giving 2 months notice. Both ATs and ASTs can be renewed. We therefore propose that *'the private residential accommodation must either be sold on long leases or be let on assured or assured short hold tenancies'*.

One of Camden's key objectives is that the internationally iconic music based nature of Denmark Street remain and is enhanced. We are concerned that the extent of private housing proposed in Denmark Street may compromise this objective and we feel that the music related uses (not just retail) should be maximised as far as possible. We were unconvinced that the mansion blocks in St. Giles High Street could not, at least in part, be converted into suitable private housing overlooking the attractive new piazza and the re-clad housing opposite.

We therefore suggest from the second floor upwards where not occupied by music related uses the space becomes B1 office to the extent that an equivalent floor space of housing is relocated to York and Sheldon Mansions. We recognise that some plant to service the development has to go somewhere and having it in its own block may be more satisfactory than having it above other uses. Our question is what exactly is the plant, how much space does it really need and could some housing be sensibly located adjacent to it or above it?

Were it possible to relocate such plant elsewhere (and where there is a will there may be a way) the use of Y&S for housing would in our view assist in the Council's objective of maintaining and enhancing Denmark Street as an internationally renowned centre for popular music.

Public Realm:



Please see [Appendix 1](#) which repeats the comments we made previously regarding Centrepoint as they also apply here, i.e. a joint approach between Camden, Consolidated and Almacantar.

We feel there should be the joint provision of public lavatories within the new piazza. Those provided in the basement of the 'Outernet' or other buildings might be suitable, however the applicant and others may prefer these to be outside their premises. This could be achieved by Consolidated paying for the capital cost of two 'pay for use' automatic toilets plus one stainless steel urinal (as per that in use in Soho Square). LB Camden ought to install and maintain these toilets. In addition that signage should be provided outside and within the 'outer net space to toilets in the basement and that no charge should be made to the public using these toilets.

Given the large number of 'fastish' food outlets we feel there is a need for a substantial number of litter bins in the new piazza with some form of joint management for same surrounding streets at locations to be consulted upon with some form of joint management for same.

Delivery and Servicing Plan



General Comment

Deliveries to and collections from new buildings/uses is one of the main ways in which they have an impact on neighbouring occupiers once the development phase is over. The need for a comprehensive plan is often overlooked by developers and planners because it seems relatively unimportant at the time of the application. However once the development is completed the management of deliveries and collections is one of the main sources of complaints by local residents and other businesses.

In this case it is clear that the applicant has put a lot of thought into the DSP and we welcome this. We do however have some significant concerns regarding whether or not it will work in practice.

Basic Proposal

The DSP proposes to have 2 stretches of loading bays in Denmark Street with a capacity of 5-6 goods vehicles can supply the full servicing requirements both for the existing users on Denmark Street and for the new development. The estimate of the servicing need is of the order of 131 vehicles per day. It is assumed that there is a dwell time of 15 minutes.

The DSP assumes a time window for deliveries (apparently imposed by LBC) of 07:00-21:00.

The DSP proposes to manage demand actively so that there are 16 deliveries per hour and gives neat graphs to illustrate how these can be accommodated within the time window. With the 15 minute dwell times this means that 4 of the 5-6 bays are occupied at any one time.

If larger vehicles are used then the number of bays available is reduced and the utilisation of the bays will approach 100%.

Our Concerns

This is a theoretical exercise which we believe:

- May underestimate the demand for servicing space

- Is overoptimistic about the ability of the Applicant to plan deliveries for a large number of separate users (and enforce the plan)
- Uses close to the maximum capacity of the site, which is unwise given the way in which traffic congestion will limit the ability of delivery vehicles to hit a 15 minute delivery window.
- Requires these loading bays to have different bay times than those in the rest of the area
- Does not take account of the marshalling requirements for deliveries on the public highway.
- Does not take account of the need for a “get out” for the events space
- On bottles, regardless of the take up of a Vine Street style recycling centre, there should be a planning requirement that all bottles used at premises within the development should be crushed on site before the material goes for recycling to reduce the potential for noise nuisance.

Estimates of Demand

The report uses estimates of demand by use class and floor area to generate an estimate of delivery numbers. There is no range of certainty provided and no account is taken of the relationship between unit size and deliveries. For example 2 shops of 100m² are likely to have more deliveries than 1 shop of 200 m², but the estimates take no account of this. Denmark Street is characterised by a large number of independent business. The new development is assumed to also consist of similar specialised businesses. These may generate a larger number of servicing visits than is suggested in these estimates.

The basis for the estimate is “our experience” but there is no way to tell if this experience is relevant to this case. As the viability of the plan is entirely based on the accuracy of the demand estimate we are concerned that if demand is understated then the plan will not work.

Planning and Enforcing Delivery Timings

The management of the bays both in terms of setting up the system, providing a mechanism for booking process and also managing the actual utilisation of bays is critical. As the bays are part of the public highway it is not possible for the Manager to physically to restrict access to vehicles wishing to use the bays outside their permitted time slot or who are unscheduled. It is therefore difficult to see how this process can be made effective.

Use of Capacity

As a paper exercise the plan sounds feasible. However it will require that 130 vehicles per day can arrive within a 15 minute time window. This can be done only if drivers consistently turn up early for their deliveries, but they would then cause congestion elsewhere in the area. If 20% of the vehicles miss their window then 20% additional capacity is required. We are not certain that there is sufficient capacity to deal with this issue.

Bay Times

The proposal assumes that servicing can take place between 07:00 and 21:00, as specified by LBC. However all the other loading bays in this part of the West End operate 08:30-18:30. Outside these hours they are available for other uses. We also believe that 07:00 is too early a start time as it is reasonable for residents to be able to sleep until 08:00. If the bays were restricted to these times (as our other bays) then the total capacity is reduced.

Marshalling

As all of these bays are on street any goods will be unloaded onto the pavement. This is what happens now but the quantity of goods is much lower. With the significant increase in the number of deliveries there will be an increase in demand for pavement space to marshal the load (ie unload from the back of the truck prior to putting on a trolley). This issue has 2 paragraphs in the DSP but no detail on how much space might be occupied and how it will be managed.

Fully 50% of the servicing trips are for the A3, A4 and D2 uses, all of which are new and which are away from Denmark Street itself. Therefore the process of transporting the goods for 50% of the delivery volume will require transport into the interior of the site from Denmark Street. This will, in itself, cause congestion.

Events Space

The DSP makes provision for “get-in” requirements for different uses of the events space. However it implies that there will be no “get-out” activity after 21:00. This is not our experience of events spaces. Often the “get out activity” only starts at this time once all of the clients have left. There is no provision for this as the bays finish at 21:00. Whilst the get out could be done the following morning this is the peak time for inbound deliveries and is likely to cause an issue then. We believe that the DSP needs to make clear provision for get out activities in the period after 21:00 in order to be realistic and at the same time minimise the impact on users and local residents.

Proposed Amendments

Our view is that for a development of this size there should be provision made for some form of on-site servicing facility at or below ground level. Whilst we understand that this is difficult we believe that it is the most appropriate solution for managing the large number of deliveries required by this development.

This is especially the case for the additional trips for D2, A3 and A4 uses. These sites are situated away from Denmark Street and represent a significant proportion of the additional deliveries required. Deliveries for these uses should not be managed from Denmark Street.

We are surprised that no consideration has been given to the use of some form of off-site consolidation centre. We understand that the developer is intending to retain control of the whole site and we believe that a significant reduction in the number of planned deliveries could be achieved by the use of a consolidation centre approach. With the likely future designation of Central London as an Ultra-Low Emission Zone in 2020 this would seem to be an obvious provision to make. The deliveries from the consolidation centre could be made using ULE vehicles. We believe that this deserves serious consideration for at least a proportion of the deliveries.

Bay Capacity/Timing

We believe that a combination of the steps outlined above will reduce the demand for on-street bays sufficiently that there will be sufficient spare capacity that the bay timings can remain as standard for the area and that there is a reduced risk that late vehicles will cause a significant issue.

Marshalling

The use of a consolidation centre approach will not reduce the quantity of goods delivered but would allow better management of the process of delivering goods from the kerbside to their destination on the development. Clearly the use of an onsite facility would allow marshalling to take place off the street, which would have significant advantages.

APPENDIX 1

Centrepoint Public Real comments (These relate to having a joined up approach in relation to both developments and are as previously submitted).



PUBLIC REALM ISSUES

The public realm proposals join those proposed by Consolidated for their adjacent site. It appears this might mean buses continued to operate through Denmark Street (see under 'Site Management' below).

1. The public realm proposals should be integrated with those proposed by Consolidated with a timetable for implementation given Crossrail works and once this is done be available for further public comment and be exhibited. This should include a coordinated and consistent landscape, lighting and signage strategy for all the land in various ownerships. We would like to be consulted on the detail of the proposed public realm materials, for example the use of multi-coloured dressed setts as in Monmouth Street as part of the Seven Dials Renaissance Partnership, followed in Long Acre and Mercer South (WCC CG Area 3);
2. As the overall land is part public and part private, a management strategy encompassing the whole area involving Almacantar, Consolidated and Camden and possibly secured via a S.106 Agreement for both this application and the adjacent one by Consolidated;
3. Evidence that wind, sun and shading studies were carried out to inform proposals for the public space. This is critical in the case of tall buildings, particularly in an urban environment. The same applies to acoustics, particularly traffic generated noise;
4. A possible centrally located piece of public art as long as the cost of same does not detract from the quality of public realm materials. A specially commissioned major sculpture. e.g. as Calder in NYC, Caro, Kapoor, Heatherwick... etc. Something that gets a nickname and is a future meeting point. It could be really big, almost too big for the space! It needs to be iconic, something like Eros, or the Seven Dials Sun Dial Pillar. The column in Paternoster Square is an exemplar and would benefit both developers as an iconic meeting point;
5. A time-table for the proposed public realm works (for both this and the Consolidated scheme). Will these works have to await completion of either or both schemes? How do they relate to the Crossrail timetable etc?

PEDESTRIAN MOVEMENT TO ADJACENT AREAS

Unfortunately the development of Centrepoint removed the most direct route from the TCR area down to Covent Garden through Seven Dials (see Farrell TCR Study).

1. A more thorough understanding of context, of the opportunities for connection to the immediate hinterland through exploiting pedestrian movement patterns. In particular, a better link to Neal Street, and Earlham Street and thus through to Covent Garden via Seven Dials with a pedestrian link across Earnshaw Street and through St Giles Court;
2. Possible use of the same template as Seven Dials and CG Area 3 for footways and carriageways so as to assist in identifying pedestrian routes;
3. Key to the design of the public realm is pedestrian movement. The importance of St Giles Circus could be compared to that of Trafalgar Square and Oxford Circus. Key to TS and Oxford Circus were on-site pedestrian movement surveys followed by computer simulation by Space Syntax, then Intelligent Space. These were interactive so you could test different routes and establish real desire lines. We think this process would give a real structure to the very bland and static looking public

realm as shown. It needs a proper sun path study particularly because parts of the public areas are heavily shadowed by the buildings, old and recent and better consideration of possible materials as above.

APPENDIX 2

Some exemplars of Denmark Street's history (kindly supplied by Jane Palm-Gold)



No.4 - Regent Sounds - one of the first independent recording studio in the country where a huge album was recorded - the Stones recorded their first album there because all the majors owned all the other recording studios and the technicians wore lab coats(!). So the first that was run by the Stones' kind of people!

No.5 - NME music paper was launched here in 1952

No.6 - Infamous as the place where the Sex Pistols lived and rehearsed - lived in the upper floors and rehearsed in the out building behind (I went in the out building years ago when it was a photographic developing place for trade but never knew the history of it!)

No.9 - La Giaconda - infamous as the café where all the pre-fame musicians hung out because their services might be required in recording sessions happening on the street. Bolan, Bowie, Small Faces, Jimmy Page - the list is endless who hung out here... The 18th c painter Zoffany also lived here briefly.

No.19 - Melody Maker, the long-running music paper first founded here by Laurence Wright, c.1919,1920

No.20 - Elton wrote Your Song on the roof

No.21 - Rhodes Music - Clapton bought guitars here

No.22 - The very first independent recording studio was established here by Ralph Elman in 1954. Tin Pan

Alley studios is the only studio left in the street now and run by Steve Kent and according to Suggs book ('Suggs and the City'), the studio was a training ground for the Who and the Small Faces in the 1960's before they broke big. Steve Kent says in the book that this one recording studio left here in Tin Pan Alley is increasingly finding it difficult to break even because of home recording and thus recording studio rates have had to fall in price...

N.25 - There is Pathe film of this place when it was Leeds music - this shows song writers and composers at work with many artists who would be big: I believe Petula Clark is shown singing in one...

Wp ref:db/ wen/consolidated/17.03.13