

Gwyn Richards
Director of Planning and Development
Environment Department
City of London Corporation
[REDACTED]

31 August 2024

Dear Mr Richards,

RE: 24/00176/FULL: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works. Please note this is a re-consultation following the submission of amendments comprising the following: - Addition of an accessible car parking space within the courtyard; and - Addition of a flue to the courtyard elevation, serving an emergency generator (“the Application”)

It was only after receiving an email with the date of the proposed determination meeting and details for applying to address the meeting that I realised there were revised drawings and plans, along with other documents:

Four documents were posted to the planning portal on 05 July, including the third version of the proposed west elevation, a swept path analysis for a large car and a schedule of proposed drawings. The fourth, the first version of PL224 – the proposed courtyard north elevation – doesn't seem to be included in the schedule though; and

Including a belated consultee comment from The Gardens Trust, a Design and Access Statement Addendum No2 – although there doesn't appear to be a No1 – and the TS Addendum, 25 documents in total were posted to the planning portal between 20 and 24 August

but no effort appears to have been made to inform the 57 – to date – objectors.

As a result, residents' interests have been ignored in your failure to notify objectors of the posting of the 29 additional documents. No doubt there is no statutory obligation on your part to do so but there was nothing preventing an opportunity to show residents respect for once through notifying them.

Having already submitted comments on the Application on two occasions, below are my further comments which should be treated as an objection. These deal with the proposals regarding deliveries, waste collection and disabled parking set out in the D&AS Addendum No2 – although there doesn't appear to be a No1 – and the TS Addendum.

My comments of 05 March refer to the potential closure of the Beech Street/Bridgewater Street junction to vehicles but, along with vehicle restrictions at the Beech Street/Golden Lane junction, there is also the possibility that same could be introduced on Beech Street itself. However, neither the D&AS Addendum No2 nor the TS Addendum refer to these possibilities with the proposals for deliveries, waste collection and disabled car parking all reliant on the Beech Street/Bridgewater Street junction remaining open.

Rather than relying on the continued use of the Beech Street/Bridgewater Street junction, the Application should be amended to address the possibility that access to Bridgewater Street may only be possible via Golden Lane, Brackley Street, Viscount Street and Cripplegate Street. Even then, access via Golden Lane may only be available from Old Street and, of course, although temporary, the construction works at 1 Golden Lane are likely to mean the closure of Brackley Street to through traffic.

During the “experimental” Beech Street Zero Emissions Scheme, City Corporation's waste collection operatives collected domestic waste with both Beech Street junctions closed. This, though, didn't extend to 45 Beech Street. Whatever waste there was – vastly reduced because of both lock downs and working from home – wasn't included in City Corporation's domestic collections.

The proposed waste collection arrangement – from the street level bin store to the RCVs via a new dropped kerb – has been accepted by City Corporation as the “trundle” distance would be less than 11 metres. However, I understood the maximum “trundle” distance to be 10 metres. That approval, though, ignores the likelihood that the RCVs will have to either undertake 3-point turns or reverse into/from Bridgewater Square to exit Bridgewater Street via Cripplegate Street if the junction is closed.

You should require the applicant to submit proposals as to how it will respond to the impact of both alternatives for RCVs on pedestrians, cyclists and other road users in Bridgewater Street and Bridgewater Square if the junction is closed. At the same, you should require the applicant to submit a feasibility study for RCVs undertaking 3-point turns in Bridgewater Street.

As far as the proposals for waste bin storage are concerned, there is one obvious issue, in addition to the “trundle” distance. The movement of the bins up and down the ramp will be noisy and produce a negative impact on the residential amenity of residents on all four sides including those living in the proposed development. There is also the problem of available space on the ramp if the disabled vehicle space is occupied as the waste bins appear to be as wide as the available space on the ramp.

In addition to the proposed disabled parking space on the ramp, the TS Addendum refers to the proposed additional space in Bridgewater Square adjoining the existing one. This proposed space seems unsuitable for an occupant of 45 Beech Street as it would be a considerable distance from the building’s entrance and the journey to and from there necessitates crossing Bridgewater Square. A more suitable location, especially if the junction with Beech Street is closed, would be on Bridgewater Street, north of the entrance ramp. Not only would this be notably closer to entrance door but proximity to the entrance ramp would make turning a car around much easier.

According to the D&AS Addendum No2:

The net increase of deliveries in the area will be small as there [sic] deliveries associated with the current office, such as Royal Mail and most delivery vehicles are already part of the network for surrounding buildings.

This may well be correct but the closure of the Beech Street/Bridgewater Street junction will create a cul-de-sac. As proved by the occupants of Clarendon Court, deliveries to and collections from the proposed development, when it’s fully occupied, will be substantially more than is currently the case. Whether or not there will be an increase in the number of delivery vehicles in Bridgewater Street will depend on how deliveries are organised, particularly as several drivers tend to park and trolley parcels etc to the various blocks. Noticeably though, the applicant appears to have completely ignored the likely use of cabs by residents of the proposed development.

Finally, the key to the various elevation drawings indicates that the dark areas are “retained existing structure” and the light areas are “new structure”. However, from looking at the drawings, the opposite appears to be the case.

Best regards,

Fred Rodgers

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