



info@CoventGarden.org.uk

www.CoventGarden.org.uk

Christopher Smith
Planning Solutions Team
London Borough of Camden
5 Pancras Square
London
N1C 4AG

via: Planning@Camden.gov.uk & Christopher.Smith@Camden.gov.uk

3rd July 2023

Dear Christopher,

Re application ref. 2023/1021/P
for extension and works to the Travelodge Hotel at 10 Drury Lane, London WC2B 5RE.

As the amenity society for the area for over 50 years, Covent Garden Community Association objects to elements of this application.

However, if the application were modified in these respects, we would withdraw our objection:

1. Around the open 'South' corner steps: modification of the property so as to prevent antisocial behaviour.
2. At the West side of the building, at levels 3-4 around the new bar areas, addition of:
 - a) fritted or otherwise obscured glazing to the windows to reduce overlooking, and
 - b) soundproofing to the walls, along with planning conditions to prevent noise nuisance.
3. Use of High Holborn only for site vehicle access during the redevelopment works.

Further, we believe that Travelodge has an opportunity to improve the property at the same time in other ways, at a low cost. This would also enhance the neighbourhood, and the Seven Dials conservation area which surrounds it and from which it is very clearly seen. We suggest some of these ways below and would welcome further dialogue with the Travelodge team.

CONTEXT

The West side of the hotel faces Dudley Court, a large social housing block of 90 flats, some reserved for sheltered housing, many of the rest being family flats, with a private driveway between the two buildings. The main extension, with 55 new bedrooms and a larger bar space over 2 levels, is proposed overlooking this driveway and overlooking the flats at Dudley Court.

The East side of the hotel fronts Drury Lane, a single lane road with mixed uses at ground floor level and residential units from first floor level upwards, for example Goldsmith Court with 16 flats directly opposite the hotel. The new entrance is proposed on this street.

The South side of the hotel fronts Shorts Gardens, a quiet and very narrow back street with high buildings on both sides which means that every sound echoes, especially after the area has quietened down by about 10pm each night. The North side of the hotel fronts High Holborn, a busy wide road.

The hotel is a large one and, with this extension, we understand will have more than 500 rooms and therefore an occupancy of around 1,000 guests. The behaviour of these guests has a significant impact upon the amenity of neighbouring residents.

The building was, in the past, a 4 star 'Moat House', part of the Queens Moat Houses group. It was converted to a 2 star Travelodge some time ago, which has attracted a younger and more lively client base including groups such as 'hen parties'.

ANTISOCIAL BEHAVIOUR

The hotel site has had problems with antisocial behaviour for over 20 years. Unfortunately, the staff have been unable to manage it.

The main issues have been:

1. Serious noise nuisance from hotel guests eating fast food and partying very late at night in the open areas of the hotel, such as the steps on the Drury Lane frontage and the entrance courtyard at the top of the corner steps. This has woken people regularly and made life for neighbours on Drury Lane, in particular, very challenging. It also encourages local takeaways to stay open beyond their permitted hours, causing more noise nuisance and litter.
2. Noise from guests returning to the hotel late at night, some using even noisier pedicabs, and many having consumed an excess of alcohol.
3. Guests opening their windows late at night when in party mood, overlooking and disturbing residents on the Dudley Court side.
4. Drug dealing and consumption, including needle debris, in the ramp and walkway by the West wall of the building. The main groups involved have been criminal gangs and the street drug population.
5. Loitering on the corner steps. Some of this has been related to the drug problems.

DESIGNING-OUT PROBLEMS & OPERATIONAL MANAGEMENT

Some elements of the applicant's proposals are likely to improve the issues with antisocial behaviour that we have outlined above. However, some of the issues are likely to be made worse without further design work. We therefore cannot support this application without modifications.

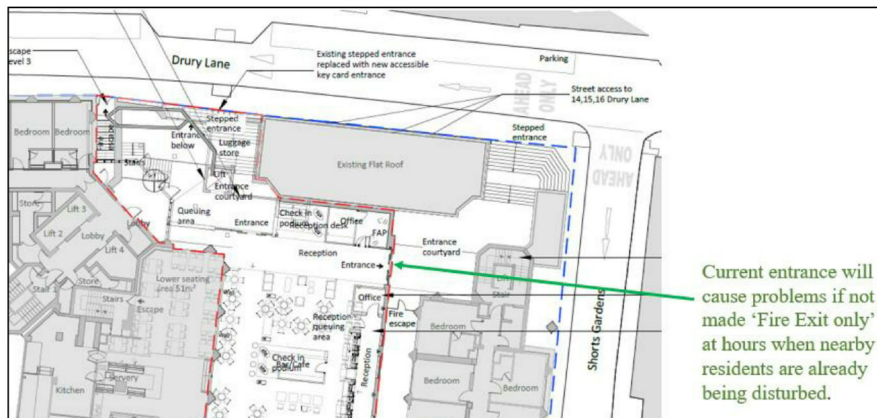
Corner steps and podium courtyard

The open 'South' corner steps already attract antisocial behaviour, as outlined above, as does the courtyard at the top of them. The new proposals are likely to increase this because the main entrance to the hotel will no longer be located here. The constant stream of guests up and down these steps has deterred loitering during the day and to some extent at night.

With little else going on, the street drug population is likely to use the steps more, and even to be drawn up into the courtyard. Guests who want to eat fast food or continue to party late at night will find a nice empty space to use up there, right in the faces of people trying to sleep on Drury Lane. And with 55 more bedrooms, there will be more guests to do so.

We request Camden as the LPA to ask the applicant to design out these problems before any consent is given to the scheme. Solutions might involve enclosing the steps and courtyard, or gating the steps so that they are only openable with a button for fire escape purposes.

We also ask that the current South entrance, which will be a subsidiary entrance under these proposals, be rendered a 'fire exit only' between the hours of 21:00 and 08:00. This is shown on the plan below. The modification would be inexpensive, and would minimise use of the courtyard and steps by guests at night.



Finally, we ask that CCTV be used to monitor this area, and that staff must ask guests to leave this space at night under the hotel's Operational Management Plan.

Double-height bar on West side

Residents in Dudley Court will suffer increased overlooking and nuisance as a result of this scheme as currently designed. We do not object to the hotel increasing its capacity by about 100 guests, but in return mitigations must be put in place to prevent harm to amenity, particularly from the enlarged bar area.

We suggest that, at the very least, the addition of these elements on the West side of the building, at levels 3-4 around the new bar areas:

- fritted or otherwise obscured glazing to the windows to reduce overlooking, and
- soundproofing to the walls to protect against noise nuisance.

We also ask for planning conditions to prevent noise nuisance from the operation of the hotel and its equipment. These should include:

- no music or sound from amplified devices that is audible outside, and
- the usual acoustic requirements for plant to operate below ambient levels at all times, and to be switched off at night where appropriate.

Ramp to Shorts Gardens

Given the new entrance on Drury Lane, which we support and which is fully accessible, we believe that there is no longer a need for the ramp on the South West corner of the building, and that it should be removed. As described above, it has caused problems with crime and antisocial behaviour for a long time.

Security

As part of any Section 106 agreement, we ask that the hotel pay for at least two CCTV cameras in the public realm, to be included in the network monitored by Camden.

These would be best placed:

- in Drury Lane, so as to cover the frontage and corner with Shorts Gardens, and
- in Shorts Gardens so as to cover the open area at the West side of the hotel.

We also ask that the hotel upgrade its own camera coverage to include all external areas and enable staff to react quickly to problems as part of their Operational Management Plan.

General operation

We do not favour making bedroom windows unopenable. But given past problems, we do ask that notices are placed beside the inside of bedroom windows on all sides of the hotel except the North. These signs should remind guests to respect their residential neighbours, and to keep windows closed after a certain time or if there is noise in the room.

As a condition of any consent we also ask for a single method of 24/7 contact with a member of staff who has authority to require guests to comply with reasonable requests or be asked to leave.

CONSTRUCTION MANAGEMENT

Once the building's under-croft is cleared, we see no reason why site traffic cannot enter and leave from High Holborn. Currently the applicant is considering entry via High Holborn and exit via Shorts Gardens.

Shorts Gardens is a narrow and generally quiet back street, but residents there are currently suffering from building works that have no choice but to use it. To add any further to this distress would be unacceptable where a viable alternative exists. Please require the CMP to use High Holborn only for access to the site.

OPPORTUNITIES

Travelodge has put a lot of thought into the design of the new entrance at the front, which we support, and the design of the new bar area at the back. They have also considered opportunities such as the green and blue roofs, which we support.

However, we believe that there is the opportunity to do a little more here. The hotel occupies a prime corner site and has some interesting spaces as part of its design. It is surrounded by conservation areas: the prime Seven Dials Conservation Area to its West, South and East, and the Bloomsbury Conservation Area to its North. Currently it does not bring the value to these neighbourhoods that we believe it could.

These are the areas which appear to us as opportunities:

- The South steps and podium courtyard. If these were enclosed, as suggested above, they would create value and stylish space from what is unfortunately currently a fairly sad, dank corner. A fire exit route would remain, but the new build could be used as bright circulation or café space.
- The ramp to Shorts Gardens. This could be removed, as suggested above, given the new accessible main entrance at the front. The space here at the back space could be enclosed and used either as further bedrooms or an extension to the bar / lounge area.
- The retail parade at street level on Drury Lane. With a bit of superficial upgrading this parade could be far more attractive and enhance views from the conservation area.
- The flat roof above the retail parade. If this were enhanced, it would complement the new entrance and could create a really beautiful principal frontage on Drury Lane at minimal cost. One possibility would be rich landscaping with evergreen Cypress trees etc.

Covent Garden Community Association has been working to preserve and enrich the Covent Garden area for over 50 years. In the 1970s we were founded to prevent the historic neighbourhood from being demolished and replaced with concrete high-rises and 4-lane roads. The Travelodge building is, in fact, the only element of that 65 acre scheme which was built, so we have a certain ironic affection for it locally.

Some of our members were able to attend a meeting with Travelodge on 16th June, which is reported as having been productive. We hope to build on this, and to continue the conversation in order to find ways of adapting this scheme that would be to everyone's advantage.

Yours sincerely,

Amanda Rigby
Vice-Chair

Email: [REDACTED]
Mobile: [REDACTED]