



PROPOSED HOTEL
 BROOK HOUSE
 2-16 Torrington Pl

Gordon Mansions Residents Association
 Re: Proposed HOTEL at Brook House
MAP 1
 showing Residential Enclave
 (hatched) = RESIDENTIAL

Gordon Mansions Residents Association

Please reply to: Clive Henderson, Chair, Gordon Mansions Residents Association,
5 Gordon Mansions, Torrington Place, London WC1E 7HE.

**Regeneration and Planning,
Development Management,**
London Borough of Camden,
Camden Town Hall, Argyle Street,
London WC1H 8ND.

10th March 2016

For the attention of Obote Hope, Planning Officer.

Sent by email to: planning@camden.gov.uk

Dear Obote Hope,

Re: Brook House, 2-16 Torrington Place, London WC1E 7HN:

Details of acoustic report in relation to condition 5 for Change of Use from offices (B1) to hotel (C1), Change of Use (and with proposed extension) from Offices (B1) to Hotel Use (C1): replacement of existing roof top plant room with new roof top plant enclosure, etc.

Planning Application ref: 2016/0399/P

I am writing on behalf of Gordon Mansions Residents Association (GMRA), and especially for residents whose flats overlook Torrington Place. I myself live in one of the flats overlooking Torrington Place in the first block whose flats are nearest to the proposed hotel at Brook House and thus nearest to the proposed new roof top plant in its new location.

Gordon Mansions and the local residential community:

Gordon Mansions consists of two blocks of flats (77 in total) that are located in Torrington Place at the junction with Huntley Street, and with many of the flats (including mine) overlooking Torrington Place. There is a long established residential community here in Gordon Mansions, which very much reflects the cross-section of the diverse population of Fitzrovia, having as it does a mix of tenants and leaseholders, with different income, cultural and ethnic groups, including families with young children, and elderly people. A good proportion of the residents are from the Bangladeshi community, and a further proportion from other ethnic minority communities including from the Somali community. The blocks of flats are owned by Camden. The community here is a stable one with many residents living here for 20, 30 and 40 years. Thus, it is important that planning developments are assessed in protecting the residential amenity of the local community.

Gordon Mansions' building in relation to Brook House, 2-16 Torrington Place:

Many of our flats overlook Torrington Place. Brook House is diagonally from our first block. Please see our enclosed **MAP** showing the residential concentration in our immediate area, and the relationship of Gordon Mansions to Brook House, 2-16 Torrington Place.

Fitzrovia Area Action Plan (FAAP):

Because of our concern about protecting residential amenity in our immediate area around Torrington Place and Huntley Street, our Residents Association particularly made representations on the draft documents, and attended the Examination Hearings in 2013, and particularly in relation to various aspects of protecting residential amenity due to planning developments/re-developments.

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Re: Brook House, 2-16 Torrington Place, London WC1E 7HN - *continued*:
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Fitzrovia Area Action Plan (FAAP) - continued:

This was adopted by Camden in March 2014, and includes Principle 9 in relation to Residential Amenity which states:

"The Council will have regard to the particular impacts on residential amenity that arise from the dense mix of land use in Fitzrovia, and will seek:

To prevent cumulative harm to residential amenity from noise, mechanical ventilation"

Representations and objections:

We wish to object for the reasons set out below.

- (1). We are at the disadvantage of not having access to an acoustic consultant or specialist advice.
- (2). For the flats overlooking Torrington Place, we do not experience air-conditioning noise at present especially when the windows are closed. In addition, evenings and weekends are also "quiet" periods due to very little traffic after about 7pm weekdays and all day throughout weekends (except Sunday afternoons after midday due to Sunday shopping). From my experience, especially in the evenings there is a relative "deadness" of (no) sound which is really important to maintain.
- (3). Our concern is to ensure that this situation is at minimum not made worse by the proposed new roof top plant at Brook House for the new hotel (in place of offices).
- (4). By contrast, this compares with other Gordon Mansions flats which overlook other streets/locations, (e.g. those that overlook the rear Yard of 1-19 Torrington Place; and those overlooking Chenies Mews).
- (5). Until recently, there was much traffic (one way east to west) in Torrington Place during the daytime Monday to Friday, but very little traffic in the evenings after 7pm, and at weekends and public holiday days. Thus, for residents our quiet periods are evenings after about 7pm, and weekends (except after midday on Sundays due to Sunday shopping traffic).
- (6). But recently, there has been a change of circumstances (and since the noise readings were taken at Brook House in the Acoustic consultant's Report). Camden has recently introduced a traffic scheme in Torrington Place, whereby no traffic from east of Gower Street can enter into our part of Torrington Place. This has completely changed the levels of traffic and noise in the last few months in our street; there is now very little traffic in the daytime now especially compared with the very large amounts of daytime traffic with tail-backs for the whole length of the street. This has meant that Torrington Place is now very much quieter in the daytime. In the evenings it was always relatively quiet, but now is even more quiet. This is part of Camden's long term plans for the West End Project traffic scheme (2-way traffic in Tottenham Court Road and Gower Street) which is due for completion by 2018
- (7). With reference to Clarke Saunders Acoustic's letter of 20/1/2016 and their earlier Report of May 2013 (Noise & Vibration Impact Assessment), my understanding is that Position 1 is for readings taken in Torrington Place, and Position 2 for those taken in Tottenham Court Road.
I am puzzled and concerned that the minimum reading for Torrington Place are similar both day and night time, even though there was much traffic in daytime, and little in evenings.
- (8). In their Report, section 4 "Design Criteria" table 4.2, it would appear that the criteria for the nearest noise sensitive facade is 45dB (daytime and evening) and 44dB (night time). This seems high especially considering how quiet it is here in the evenings.

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Re: Brook House, 2-16 Torrington Place, London WC1E 7HN - *continued*:
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(8). Continued:

As a comparison, for the recent proposals by UCL in the rear Yard of 1-19 Torrington Place (for UCL's Big Data Centre), the design criteria has been set at 44dB which we regarded as high. But the flats that overlook this Yard experience existing very noisy air-conditioning noise, unlike those overlooking Torrington Place.

Thus, we are seriously concerned that the dB level being set for Brook House will introduce noise levels that we do not have at present.

- (9). In their Report, para 6.2, reference is made to the nearest noise sensitive residential receivers being at 22-24 Torrington Place with windows overlooking Torrington Place. 22-24 Torrington Place is next door to, and adjoins, Brook House; it is an office building with two flats on the top floor. But due to refurbishment more than a year ago, these flats no longer exist. No. 22-24 is not wholly office use.

Thus, I think that the first block of Gordon Mansions may now be the nearest noise sensitive building in relation to Brook House and the proposed plant room. The Report gives no impact assessment on Gordon Mansions.

- (10). We are particularly concerned that the proposed mechanical plant on the roof will be located at the end nearest to Gordon Mansions, and thus the likely impact of noise. The existing plant was at the further end near Tottenham Court Road.
For similar reasons, we are concerned about the noise impact of the introduction of the proposed Discharge at Ground Floor in Torrington Place and close to our flats.
There is also that further plant on the even higher new 7th Floor level.

- (11). As I have said above, the Gordon Mansions flats are diagonally opposite Brook House. The front rooms of our flats have bay windows, and thus pick up sound from three directions (compared with flat fronted building). Thus, our flats nearest to Brook House are even more susceptible to picking up noise because the 45degree side window of the bays faces directly the Brook House building

- (12). Incidentally, Clarke Saunders Acoustic's letter of 20/11/2016 (page 3: Predicted Noise Levels) refers to 1-16 Torrington Place as the nearest sensitive receiver. We assume that this intended to refer to No. 1-19 Torrington Place which is currently occupied by UCL (a mix of office and educational uses).

Conclusions:

- (a). We are particularly concerned that the current situation where we do not experience air conditioning noise (especially with windows shut) is maintained for our flats overlooking Torrington Place. We are not convinced that this will be so. We are particularly concerned that the Design Criteria appears to be set at 45dB and 44 dB, which seems very high. This compares with the Standards under BS8233:1999 for Living Rooms & Bedrooms of 30dB (regarded as "Good"); and 40 and 35dB respectively (regarded as "Reasonable"), as set out in their Impact Assessment Report of May 2013, para 4.2.
- (b). There has been an important change in circumstances since noise readings were taken for their Report of May 2013. The readings (taken on one day only) were carried out on 11/11/2012.
As described above in our letter, a new traffic system has been introduced into Torrington Place in the last few months, whereby traffic from east of Gower Street cannot enter this part of Torrington Place. This has dramatically reduced the traffic (especially in daytime) to very little, and thus dramatically reduced the traffic noise.
Thus, in these circumstances, we think that the noise readings should be re-taken, and the noise levels and design criteria re-assessed.

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Re: Brook House, 2-16 Torrington Place, London WC1E 7HN - *continued*:
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(c). Also, as described above, the nearest noise sensitive residential receivers (as referred to in the Acoustic Report) at 22-24 Torrington Place (i.e. the top floor flats) no longer exist. Again, we would ask that this is re-assessed. In the new circumstances, it would appear that the first Gordon Mansions block of flats may now be the nearest noise sensitive residential receivers.

For all the above reasons, we object to the current proposals, and would particularly urge that they are re-assessed for the above reasons. You will appreciate that we wish to maintain the existing low background noise levels as experienced by those living in the Gordon Mansions flats overlooking Torrington Place. It is fortunate that we do not currently hear air-conditioning noise, especially when the windows are shut; we want to keep it that way !

If you have any queries about my letter, I can always be contacted on my mobile 07967 856 167.

Yours sincerely,

Clive Henderson,
Chair,
On behalf of Gordon Mansions Residents Association.

Copy: Sandra Wheen/GMRA Secretary.
GMRA Committee; and residents.
Ward Councillors:

Enclosed: GMRA's **MAP** showing residential.

Regeneration and Planning,
Development Management,
London Borough of Camden.

For attention of Obote Hope, Planning Officer.

Dear Obote Hope,

**Re: Planning Application: ref: 2016/0399/P:
Brook House, 2-16 Torrington Place, WC1 - additional comment:**

With reference to my letter of 11th March 2016, below, emailed to you on Friday, I have just realised that I forgot a particular point which I would like to make:

(a). As I have said, for our flats overlooking Torrington Place, at present we do not generally experience air-conditioning noise when the windows are closed. What I forgot to go on to say is that recently I have heard a low, deep mechanical whirring noise (when the windows are closed), which is on for a time and then cuts out, in daytime and evenings.

I have not been able to identify the source of this new noise yet, but new or replacement mechanical plant has been installed recently in nearby buildings:

(1). at 22 Torrington Place (known as Heal's office building):

- new plant at roof level as part of recent refurbishment of this office building.

(2). at 1-19 Torrington Place (UCL: mix of office and education):

- on low level building along Torrington Place (2nd Floor roof level); replaced existing plant with new, apparently as like-for-like.

I do not know if these are causing this new noise, but illustrates our concern that unfortunately new installations can cause raised noise levels despite planning conditions.

(b). Further down Torrington Place (towards Gower Street), the Ridgmount Gardens flats (those overlooking Torrington Place), and the flats in the second Gordon Mansions block and the houses in Chenies Mews have also been experiencing serious intrusive new noise that they reckon comes from new/replacement plant at the Roberts Building (UCL/Engineering Dept), as well as from another UCL refurbished building in Gower Street, presumably despite planning conditions.

A resident/committee member of their Residents Association from Ridgmount Gardens tells me that he has been in touch over the last few months both with Camden (Maya Rhodes) and UCL to resolve the issue.

Regards,

Clive Henderson,
Chair

Gordon Mansions Residents Association.