

Planning Application 2018/2044/P and 2018/2721/L

Former Public Conveniences, Guilford Place, London, WC1N 1EA

We wish to object to this application for 'change of use from former public convenience (Sui Generis), to mixed A1/A3/A4 use'

A previous application, **2015/6141/P** for 'Change of use from former public convenience (Sui Generis) to mixed A1/A3 use (retail/restaurant), and associated works' was granted on 27th July 2017.

We did not object to the earlier application for two main reasons:

1. We welcomed the initiative to 'rescue' a prominent, listed, local feature which had been decaying for many years and was on Historic England's Buildings at Risk list.
2. We were satisfied that the proposed use, principally as a noodle bar, trading on the basement area only, not on the street-level roof, would not impact adversely on the local community. We were reassured that restaurant use would mean that the number of customers in this very small space (74.5m²) could not be large.

We object strongly to this new application to allow the premises to trade as a drinking establishment (A4) on the grounds that it would substantially increase the number of customers using the premises. The main reasons for our objection are:

1. We do not believe it would be possible to prevent drinkers from moving up from the bar area and getting onto the roof of the premises (see Condition 7 below).
2. Having substantial numbers of drinkers at street level would
 - a. make this busy junction very dangerous as there is virtually no pavement around its island site (below: Informative 1 §8)
 - b. cause noise nuisance to neighbouring occupants of the ASRA Housing Association premises for Asian elders which are very close to the premises on its east flank (below: Informative 1 §9)
 - c. create a danger to drinkers themselves since the only access to the roof area is by climbing across spiked railings which cannot under the terms of the earlier application, be altered (below: Informative 1 §2).

We request therefore that you turn this application down, and maintain the limitations on the use of the premises as stated in the existing permission.

Of these limitations, we see the following as the most important and that whatever the outcome of the current application, which is simply for change of use and includes no 'associated works', they should all be re-stated and insisted upon. They are quoted from the decision letter granting application 2015/6141/P dated 27 July 2017 and followed by our comments:

Condition 7

7 The roof of the building and the pavement adjacent to the building shall not be used in association with the Class A1 / A3 uses hereby permitted.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of Policy D2 of the Camden Local Plan 2017, and in order to safeguard the character and appearance of the wider area, in accordance with Policies D1 and D2 of the Camden Local Plan 2017.

The reason given above for restricting the use of the roof of the building continue to be valid and apply in exactly the same way if the requested A4 drinking establishment use is allowed. The noise that would be generated by the use of the roof by customers and its detrimental effect on the occupiers of the residences adjacent to the building is a further reason to prohibit the use of the roof.

Informatives: 1 Para 2

The exterior walls of the building have been subject to vehicle strikes in the past, and the railings suffered WWII bomb damage. The proposal seeks to repair and restore these features. Otherwise, externally, the building will remain unaltered, except for the installation of new entrance doors, to replace the existing steel security doors (which are non-original).

We request that there be no change to the commitment to retain the exterior unaltered, including the railings around the roof area.

Informatives: 1 Para 8

The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP will be secured through a Section 106 legal agreement. A financial contribution towards highways works will also be secured.

We assume that increased activity deriving from A4 usage, were it granted, would be fully considered in the Council's assessment of the CMP when it is submitted, and that there would be full local consultation about the CMP before it is agreed.

Informatives: 1 Para 9

It is not considered that the proposed works would impact on nearby and neighbouring occupiers. The application site is in a busy location and not directly adjacent to any residential properties. A suitable

planning condition will ensure that external noise levels do not exceed specified levels.

This statement is not true: the buildings to the immediate east of the premises, a road's width away from it, are housing association premises run by ASRA as sheltered housing for Asian elders. Were A4 use to be agreed it would be essential there should be strict conditions to restrict the impact of increased activity on this vulnerable community. The levels of noise generated by a drinking establishment open very late in the night-time adjacent to residential properties should also be strictly controlled by imposing strict noise limits. The potential for noise is also a further reason to prohibit the use of the roof of the building.

Michael Pountney
Chair
Rugby & Harpur Residents Association

