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Tuesday 23rd July 2019

Dear Mr Fowler,

**Camden Town Hall Judd Street London WC1H 9JE
Response to Public Consultation on Planning Application 2019/2238/P**

Thank you for giving us the opportunity to comment on planning application 2019/2238/P submitted in relation to Camden Town Hall Judd Street London WC1H 9JE. We write to you from The Standard London who are the land owner and tenant of the adjacent Camden Town Hall Annex site, which has recently been completed to deliver a new 270 bed hotel.

Whilst we do support the refurbishment and change of use of part of the town hall, we would like to raise our concerns in relation to the operations of the eastern side of the site (Tonbridge Walk), which is immediately adjacent to our hotel room windows.

Background

The Standard Hotel (Camden Town Hall Annex)

Planning Permission was granted on the 25th August 2015 for the change of use and extension of the Camden Town Hall Annex site (Ref: 2014/7874/P as amended) for the Standard Hotel London.

Construction works of the hotel are near completion, and we are set to open on the 11th July 2019.

Figures 1-3 below show the built floorplans of the hotel, with the guest bedrooms and windows facing onto Tonbridge Walk directly outside the Camden Centre, and the new main late night entrance/exit doors that are proposed as a part of the Camden Town Hall application (Ref: 2019/2238/P).

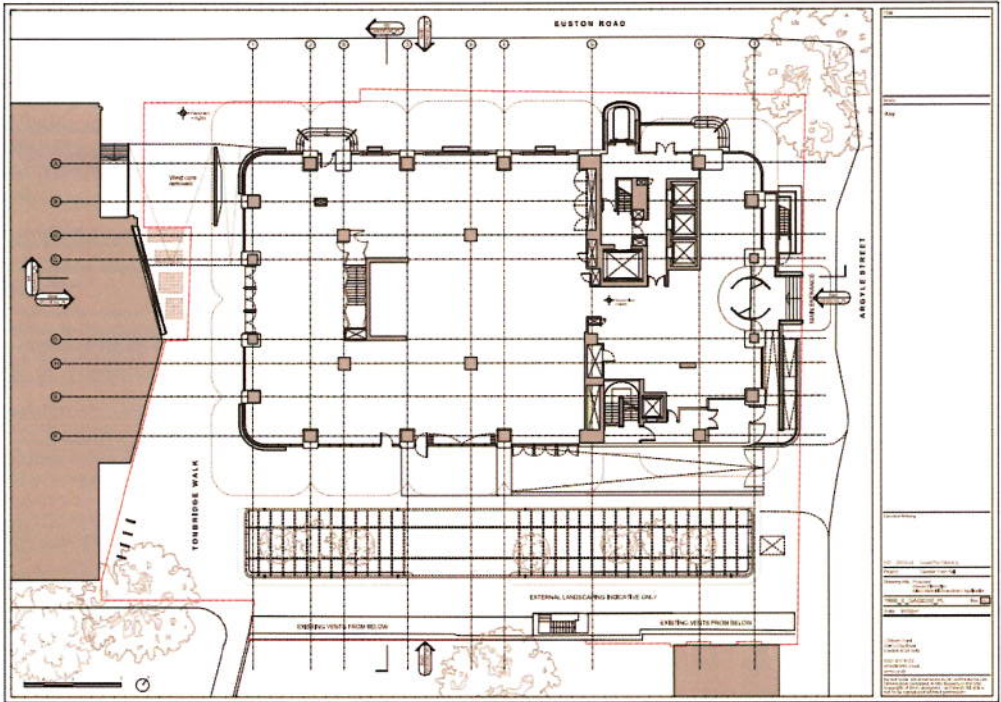


Figure 1 - Approved Floorplan showing the hotel rooms in relation to the Camden Centre (Ref: 2016/0410/P)

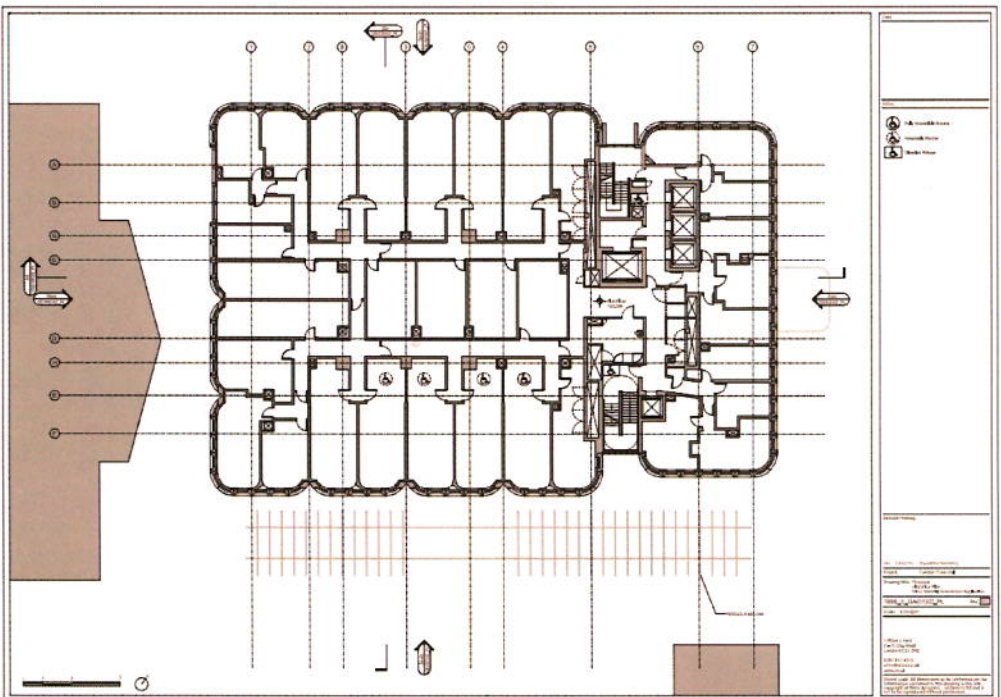


Figure 2 - Approved Floorplan showing the hotel rooms in relation to the Camden Centre (Ref: 2016/0410/P)

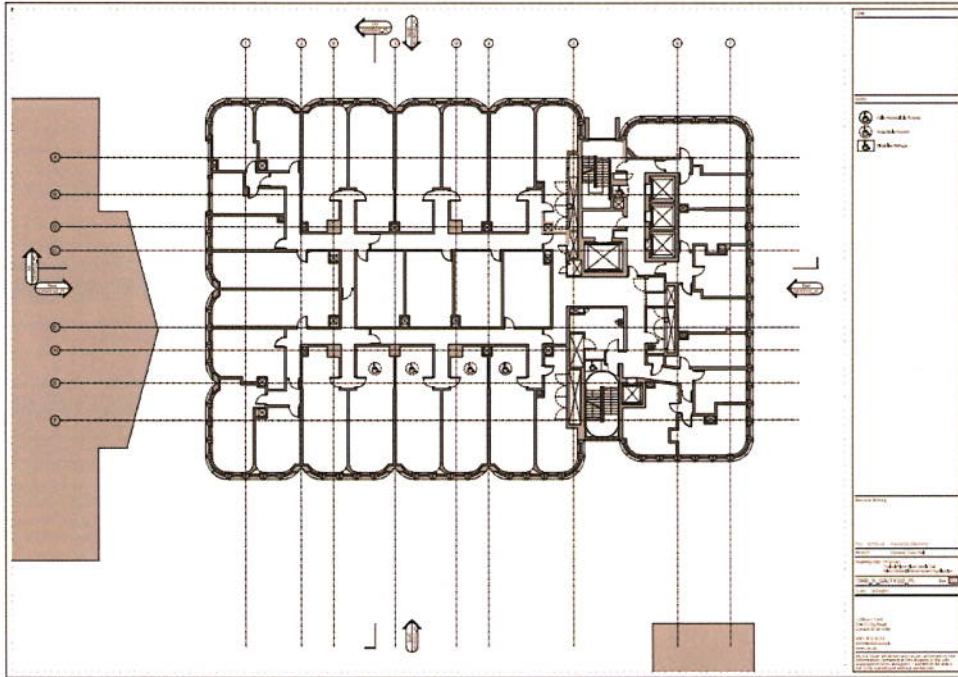


Figure 3 – Approved Floorplan showing the hotel rooms in relation to the Camden Centre (Ref: 2016/0410/P)

Figure 4 below shows the section drawing of our built hotel scheme, and the relationship and adjacency to the Camden Centre (shown as the building on the left of the drawing on Tonbridge Walk as with Figures 1-3 above).

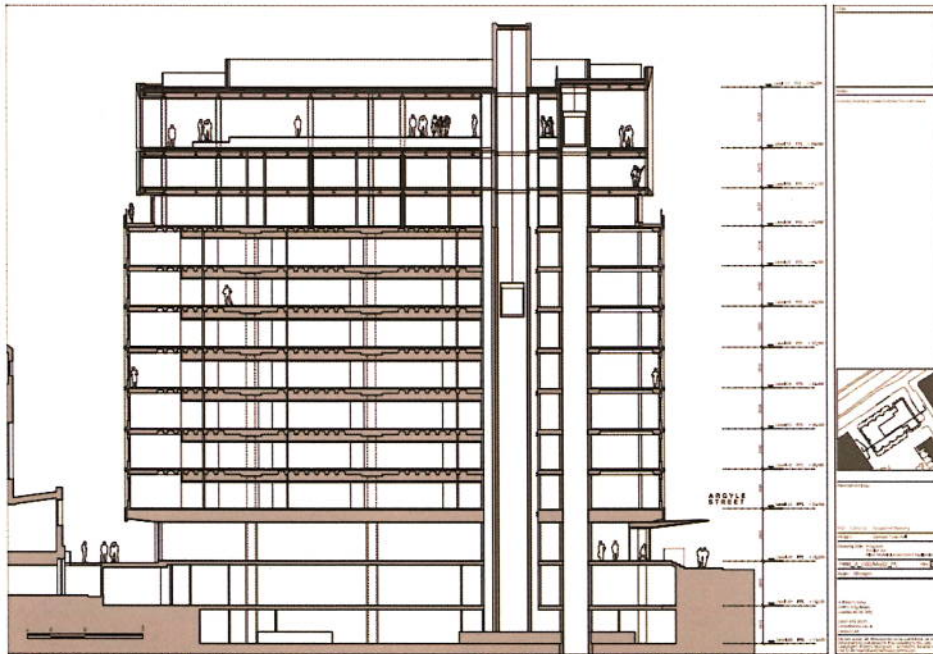


Figure 4 - Section showing the hotel rooms on the Tonbridge Walk frontage (Ref: 2016/0410/P)

Finally, Figure 5 below shows the west elevation of the built hotel which fronts onto the Camden Centre.

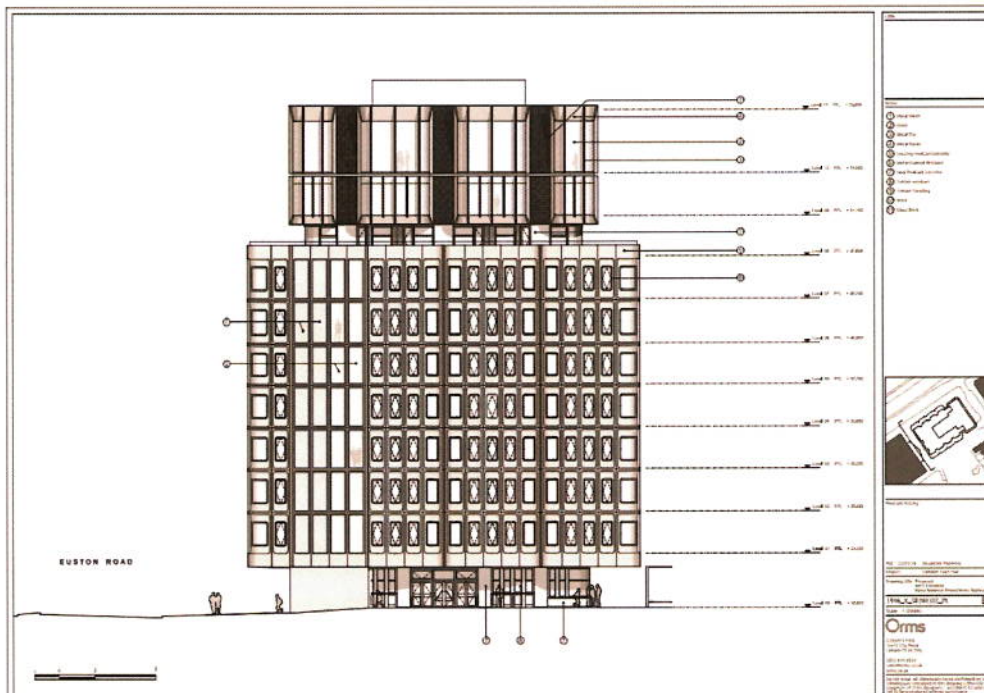


Figure 5 – Approved Tonbridge Walk (West) elevation showing the hotel rooms (Ref: 2016/0410/P)

The Proposed Camden Town Hall Application

As per the Camden planning register, the proposed development of which this consultation response relates was registered on 13 May 2019 (Ref: 2019/2238/P) for the following development:

Part change of use of the Camden Town Hall from Sui Generis at (part) basement, second and third floors to office use (B1), and the change of use of the Camden Centre from Sui Generis (Town Hall) to events use (comprising D2). Retention of Sui Generis (Town Hall) uses at ground, first floor and part basement. External physical works to include the demolition of the 3rd floor conservatory and replacement infill pavilion, demolition of 1960s Euston Road entrance, covering over three lightwells at roof level, opening up for two new doorways on Bidborough Street and two new doorways on Tonbridge Walk, works to the Judd Street entrance, refurbishment of windows, cleaning and facade repairs, new roof plant, public realm improvements, new on street loading bay and other associated works.

Following a review of the planning submission, we would note that the element which is of most relevance and concern to our hotel is the proposed change of use of the Camden Centre from Town Hall (Sui Generis) to Events Space (Class D2) as shown in purple on the Tonbridge Walk frontage on the proposed Ground Floor Plan (Figure 4 below).

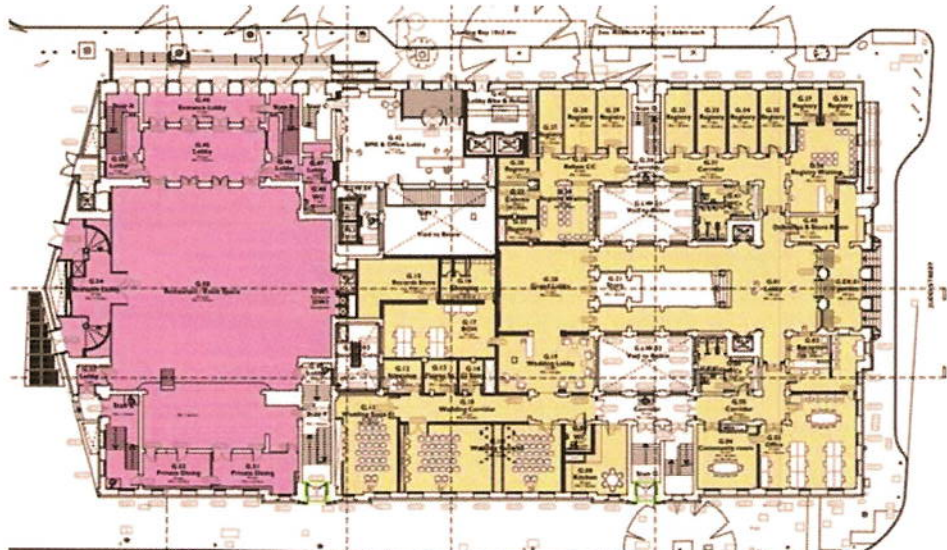


Figure 6 - Proposed Ground Floor Plan (Ref: 2019/2238/P)

Whilst this was previously used as an event space by the Council as an ancillary function to the main Town Hall use, it is now proposed to be operated as a primary use by a private commercial tenant and as such it is proposed to change the use to a Class D2 use for this demise with ancillary Class A3/A4 (restaurant/bar) uses.

The submission states that the preferred tenant to occupy this event space is 'Il Bottaccio' who would host a variety of events such as conferences, fashion shows, art launches, exhibitions, weddings and other corporate events.

As per the application form, the proposed operating hours for the events space is proposed as below:

- Mon-Fri: 09:00 – 01:00
- Sat: 09:00 – 04:00
- Sun / Bank Hol: 09:00 – 01:00 (the next day)

We also note that there is a Regulated Entertainment Licence in place for these times, allowing music/performances etc.

In addition to the change of use and internal works, it is also proposed to introduce a new main entrance to the new use on the Tonbridge Walk elevation with two large doors leading into the Events Area, fronting onto The Standard Hotel.

The uploaded Management Plan for the preferred tenant states that the Bidborough Street entrance is to be retained for use during daytime events (before 21:00), and that the proposed Tonbridge Walk entrances would be used as the sole ingress/egress during evening events to be managed by security staff so as to minimise the disturbance to nearby residents.

Response to the Proposals

Whilst we encourage the activation of this part of Tonbridge Walk and support proposals which could positively contribute to the improved 'placemaking' impacts of the area, we consider that the proposed late night operations would lead to serious disturbances in respect of our noise-sensitive hotel bedroom windows which are in very close proximity opposite the proposed late-night exit of the proposed Events Space.

We acknowledge the intention of the applicant to avoid disturbing the residential neighbours located on Bidborough Street when guests depart late at night, however do not consider that Tonbridge Walk is an acceptable alternative as it is immediately opposite the hotel bedroom windows which are very sensitive to noise, especially given the close proximity due to the narrow width of Tonbridge Walk. In

our view the use of security guards to marshal departing guests is not a sufficient mitigation measure to resolve this issue, particularly given the volume of guests leaving the premises late evening or the early hours of the morning.

In light of the above we consider that this element of the proposed scheme poses a significant threat to the hotel in terms of reputational damage if guests complain, which in turn may threaten the viability of the hotel if we are subject to unfavourable reviews following disturbances to guests sleep.

We therefore request that the proposals are amended so that this entrance is not used beyond 21:00 to avoid disturbance to hotel guests who will sleep in the bedrooms with windows immediately opposite the Camden Centre. Should this be approved we also request that a planning condition is applied requiring that this entrance is not used for the egress of people late at night.

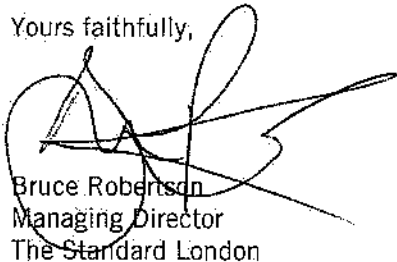
Finally, we also request that a noise planning condition is applied to the proposed Events Space, restricting the noise audible from the noise-sensitive hotel room windows.

Conclusion

Thank you for providing us with an opportunity to comment on the proposed development at Camden Town Hall Judd Street London WC1H 9JE.

For the reasons set out within this letter, we would like to offer our support to the proposed development scheme on the whole, however we would also request that Officers consider our concerns relating to the proposed Tonbridge Walk Events Space and ensure that they are addressed as part of the determination of the planning application, and a condition is imposed ensuring that the entrances are not used beyond a specified hour.

Yours faithfully,



Bruce Robertson
Managing Director
The Standard London