

ADDLESHAW GODDARD

Our reference ELSEM/HXH/262912-62

4 March 2014

The City of London Licensing Authority
Walbrook Wharf
78-83 Upper Thames Street
London
EC4R 3TD



Dear Sir/Madam

**Application for a new Premises Licence by Leadenhall 107 Limited relating to premises at 107 Leadenhall Street EC3A 4AF
Objection on behalf of THB Group Plc**

Introduction

- 1 We are instructed by THB Group Limited (**THB**), the tenant of ground floor, mezzanine floor, fifth floor front, sixth floor and seventh floor (**THB Premises**) at 107-112 Leadenhall Street, London (**Property**). THB is an international Lloyds insurance broker and the THB Premises are used by THB as offices, for meetings with clients and its UK switchboard is also located at the THB Premises. Its hours of business are 7am to 8pm. THB's lease of the THB Premises expires on 23 June 2021.

Premises Licence Application

- 2 Leadenhall 107 Limited (**Applicant**) have applied for a premises licence (**Licence Application**) to permit the following:
- (a) the sale of alcohol from 10am-12midnight on Monday and Tuesday and from 10am-2.30am from Wednesday to Sunday.
 - (b) the playing of recorded music from 8am-12midnight on Monday and Tuesday and from 8am-2.30am from Wednesday to Sunday.
 - (c) provision of live music from 6pm-12midnight on Monday and Tuesday and from 6pm-2.30am from Wednesday to Sunday.

Premises to which Licence Application relates

- 3 The Licence Application relates to part of the ground floor of the Property and the basement at the Property (**Application Premises**). Accordingly, part of the Application Premises is on the same level as the THB Premises and immediately below the THB Premises.

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Grounds of Objection

4 THB object to the application on the following grounds:

- (a) THB's hours of business are from 7am to 8pm. Staff often also work outside of these hours particularly late into the evening. The nature of the activities carried out at the THB Premises includes meetings and telephone calls with clients, training activities and desk-based work that requires high levels of concentration. These activities are not consistent with noise from a drinking and entertainment establishment located in the same building. It should be noted that the Property is an old building that was built during the 1930's and noise insulation between floors is very poor. Accordingly, THB is extremely concerned by the nature of the activities that are proposed at the Application Premises and the hours of operation of those activities which will have a significant disruptive impact on its ability to carry on its business.
- (b) The proposed entrance to the Application Premises is at the rear of the Property. The rear of the Property is also used by THB's staff to gain access to, and egress from the Property particularly after 8pm. THB considers that it is inappropriate for their staff to have to share the entrance with visitors to the Application Premises. THB's particular concerns are that its staff will have to pass groups of smokers, and perhaps drinkers, standing outside the Application Premises as well as encountering drunk and disorderly customers. THB considers that its office use and the proposed drinking and entertainment use of the Application Premises are incompatible.
- (c) THB notes that the Licence Application states that 500 people are expected to attend. This conflicts with the planning application for change of use of the Application Premises which seeks permission for a capacity of 900-1000 (see the **attached** design and access statement that accompanies the planning application). THB consider that the Applicant should be asked to confirm the maximum number of patrons who will be permitted to be at the Application Premises at one time and to explain the discrepancy with the planning application. THB submit that 500 patrons present at the Application Premises at one time will result in unacceptable levels of noise, odour and disruption and request that, should a licence be granted, **a limit of 300** is placed on the number of people who may be at the Application Premises at one time.
- (d) Without limitation to its objection to the licence being granted, THB is particularly concerned by the start time of the proposed activities. In relation to the sale of alcohol this is 10am, in relation to recorded music, 8am and in relation to live music, 6pm. These activities overlap significantly with THB's hours of business. THB object strongly to the sale of alcohol being permitted from 10am and the playing of music from 8am. However, of greatest concern is the application for permission to play live music from 6pm which would result in severe, unacceptable disruption to THB's business.
- (e) If the licensing authority were minded to grant a licence pursuant to the Licence Application, THB urge the authority to vary the start time of the permitted activities as follows:
 - (i) in relation to the sale of alcohol: 6pm
 - (ii) in relation to the playing of recorded music: 8pm
 - (iii) in relation to the playing of live music: 9pm
- (f) We refer to section 2 of the application which states that the postal address of the proposed licence premises is 80 Gibsons Hill, London. We understand that this is an error and that the application is intended to relate to the premises at 107 Leadenhall Street. However, the application is nevertheless invalid and should be rejected on this basis.

5 THB ask that the application be rejected.

Should you require any further information please do not hesitate to contact us.

Yours faithfully

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Addleshaw Goddard LLP

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Design and Access Statement

1. USE:

The highlighted area of the ground floor is currently used as a secondary means of ingress and egress the building and store area. The highlighted basement areas are currently used for storage.

Permission is being sought for the conversion of the part ground and part basement into a luxury private members bar.

The ground floor will consist of entrance lobby, reception, lift and staircases down to the basement. The basement will consist of a main bar and lounges, members bar and lounges, restaurant, kitchen, private dining-rooms, urban garden with bar, toilets and storage. The rear of the basement currently shown as store rooms will be converted into additional storage areas and offices with toilets and washing facilities for the office staff.

The ground floor external entrance will be refurbished, with new double doors, refurbished pavement area and planting. The existing cornice of the adjacent building will continue around to demarcate the lower area of the building to the proposal. The elevation will be painted to add additional demarcation. A new frame and lanterns will be added to the elevation as indicated on the drawings.

There is currently a lightwell over the basement area in part – shown on the drawings. This proposal seeks to remove the roof to this area to open the new urban garden to the exterior. The interior of the urban garden will be designing to accommodate external weather conditions and will have new planting and a large planted wall.

2. ACCESS:

Ingress into the basement will be from the new double doors to the ground floor, via a new staircase and lift. There are three egress/ escape routes proposed, through the existing two fire escape staircases at each end of the basement and the new stair and lift.

Disabled access is via the new lift, the threshold between the ground floor internal and external will be lowered to be flush to assist with this. A slight ramp on the ground floor will be required as the general floor level is lower in this area than that of the external.

From the lift exit at the lower basement level there is a ramp up to the main basement level. A disabled WC is also located at this point. Doors leading to this area will be on mechanical openers operated by a push button located at an accessible level.

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3. WASTE MANAGEMENT:

Aurimas from our office met with Terry Chown and Adrian Dulgher last Thursday to discuss the waste management scheme. Terry advised Aurimas on the amount of space required and this has been shown on our drawings. This was calculated in line with BS 5906 as advised by Terry Chown. Adrian Dulgher has confirmed that the internal fitout of this area will also be inline with BS 5906, and will comply with the London Time Bending Scheme.

4. OCCUPANCY

Adrian has requested that a capacity of 900-- - 1000 is applied for. A capacity estimate is attached to this document. We are waiting on confirmation back from the district surveyors office and therefore this actual allowable figure may be less depending on maximum exit capacity. It may also be possible to add an additional staircase into the urban garden with escape to the lightwell at ground level. Adrian will need to advise on anticipated numbers of staff over and above this estimate.

5. EXTRACT & VENTILATION

The proposed route for the kitchen extract is shown on the plans, this will link in with the buildings existing extract ducts in the lightwell. The ventilation for the areas will also follow the same route and duct up the existing lightwell wall.

I trust this meets your requirements and helps explain the proposal. If there are any changes or additional information required please let us know.

Yours sincerely,

Wojciech Gawor
Partner

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