

City of London Licensing Team
Markets and Consumer Protection
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London EC2P 2EJ

Date: 25 May 2017
Your ref:
Our ref: ROBERDA\303773-000001
Direct:
Email: [REDACTED]

By Post and by email: licensing@cityoflondon.gov.uk

Dear Sirs

**Licensing Act 2003
Representations in respect of application for Premises Licence by Gremio de London
Ltd, Gremio de Fenchurch, 26A Savage Garden, London ECN 2AR**

We act on behalf of both Carolia Tower Hotel Limited t/a Doubletree by Hilton Tower of London, the owners and Hilton UK Manage Limited, the Managers, of Doubletree by Hilton Tower of London ("Doubletree"), 7 Pepys Street, London, EC3N 4AF.

We have been instructed to write to you setting out our clients' representations to the application for a Premises Licence under the Licensing Act 2003 made by Gremio de London Ltd, in respect of Gremio de Fenchurch ("Gremio"), 26A Savage Gardens, London, ECN 2AR.

The Doubletree, is situated on Pepys Street at the junction with the now pedestrianised Savage Gardens. It is a modern purpose built 4-star hotel providing high quality accommodation for up to 1172 guests across 583 bedrooms. Approximately [50] of these bedrooms directly over look Savage Gardens where the applicant's premises is proposed to be located.

Basis of Representations

Our clients are gravely concerned by the Gremio Premises Licence application which, if granted as applied for, would permit the premises to open, 12 Noon until 00.30 Sunday, 10AM until 00.30AM Monday to Wednesday, 10AM until 01.30AM Thursday and from 10AM until 02.30AM Friday to Saturday with an additional permitted hour on the Friday, Saturday and Sunday of Bank Holiday weekends (with permitted activities ceasing half an hour before closing).

The applicant has made reference in its application to the "main emphasis" of the premises being food, but both the proposed hours and licence conditions are more akin to those of a nightclub/late night drinking destination and the premises will be operated as much more than just a restaurant. The location and the premises building are not suitable for this type of late night operation.

If this licence is granted on the terms proposed, our clients believe that, the operation of the premises will have a detrimental impact to their hotel business and the wider local area. They are especially concerned about their valued customers staying at the hotel particularly those occupying bedrooms rooms overlooking Savage Gardens and directly opposite Gremio. Guests at the Doubletree are entitled to enjoy a peaceful stay and an undisturbed night's sleep - this will be at serious risk.

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Our clients are concerned that should this licence be granted as proposed it will not promote the Licensing Objectives, including the following:-

Public Nuisance

The operation of Gremio late at night will cause substantial public nuisance. It will be a serious source of noise and disturbance to our clients' hotel residents, particularly those occupying rooms along the Savage Garden side of the hotel. There is a real risk that our client's customers will have interrupted sleep due to the late hours proposed.

There will inevitably be noise disturbance in the street caused by Gremio customers arriving and departing late into the evening and early hours. It is anticipated that once they have left the premises, Gremio customers will loiter in the proximity of the Doubletree despite the proposed implementation of dispersal procedures. There is also likely to be disruption caused by taxis and transport picking up and dropping off and both ends of Savage Gardens, exacerbated with the congestion that will inevitably be caused on both Pepys Street and Crutched Friars.

Our clients believe that despite the measures proposed in the operating plan there is a serious risk that noise and vibrations from amplified music will still escape from the premises and cause nuisance to neighbouring premises late at night/early into the morning.

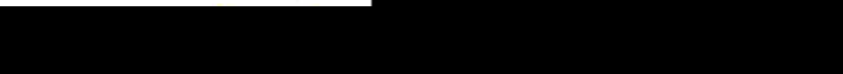
A particular concern for our clients is also in respect of the proposals for the external terraces which are unacceptable. It is not accepted that simply because the terrace to the rear of the building is surrounded by commercial properties that it will not need to be time limited or subject to additional restrictions. Our clients are strongly of the view that both terraces at ground and first floor level will be a source of noise and disturbance to residents, especially late at night and into the early hours of the morning. Sound from the terraces at the rear of the building will travel upwards and is likely to reverberate and be amplified against neighbouring buildings regardless of whether the noise is from people talking or the playing of music.

Crime and Disorder

Our clients are also concerned that the behaviour of customers leaving the premises late at night after consuming substantial alcohol into the very late hours could give rise to incidents of crime and disorder. There is a real risk that such behaviour could spill out onto the street and again having an adverse impact on the local area and cause disturbance.

As currently proposed, should this licence be granted there will be a serious impact on the local area, disruption to guests of the Doubletree and to the business operated by our clients. In the circumstances our clients would request that the Licensing Authority considers these representations with due care and reject the application in its current form.

Yours faithfully



Eversheds Sutherland (International) LLP