

Context for this representation

My wife and I have lived in a [REDACTED] apartment in Victoria House since 2015. We are both retired and spend much of the day time and every night at the apartment including at weekends. Unlike some City residents, **we live here full time** and we do not have a second home outside London.

Victoria House and the adjacent Temple House together form the “Whitefriars” residential development which was completed in 2003. Unlike in most urban residential developments, **the ground floor of Whitefriars consists almost entirely of residential apartments**, NOT commercial premises. The only exceptions are the entrance door to the Victoria House basement unit where the proposed restaurant would be located and the entrance to the car lifts which provide access for residents to the basement car park.

Apart from the location of the proposed restaurant, the remainder of the basement of Victoria House and the whole of the basement of Temple House is taken up by the residents’ car park, the porters office and storage rooms: **there are no other commercial premises within Whitefriars.**

The Victoria House basement unit has **never been used for a restaurant or similar operation**. Between 2008 and 2024, it was occupied by Jones Day for office use and they accessed it directly at basement level from their adjacent office premises. Jones Day never used the entrance door in Temple Avenue which the restaurant would have to use as their only entrance for all purposes: customers, staff, food, drink and equipment deliveries, refuse removal etc. Indeed until recently there wasn’t even a staircase behind this entrance door! This entrance is immediately adjacent to a bedroom in one of the apartments and directly below another apartment (***see photo included below***)

The Victoria House basement unit where the restaurant would operate is **immediately below a total of 3 apartments**, as shown on the plan included below. Overall there are four apartments on the ground floor of Victoria House and seven apartments, including ours, on the first floor.

Representation

We wish to make a representation for this licence application to be rejected on the grounds that the proposed restaurant would contravene the licensing objectives of Prevention of Public Nuisance and Public Safety.

Prevention of Public Nuisance

The proposed restaurant would cause significant nuisance to ourselves and other Whitefriars residents as a result of:

Noise

- The close proximity of a number of apartments to the basement restaurant and its ground floor entrance means that there is likely to be fairly continuous noise disturbance from all aspects of the restaurant’s operations, e.g. arrival and departure of staff and

customers, deliveries and refuse collections, kitchen and plant equipment. This noise nuisance would be exacerbated by the fact that there is only a single entrance to the premises which will have to be used for all of the above purposes and which is **directly below and alongside apartments occupied by residents**.

- If the restaurant's hours of operation are 09:00 - 23:00, 7 days a week, this would suggest that deliveries and refuse removal would need to take place either before 09:00 or after 23:00 as there is no separate delivery entrance and no 'high end' restaurant would allow these activities to take place through the customer entrance during their opening times. I would request that no consideration should be given to granting a licence unless the opening time is changed to 11:00 or later to allow a window for deliveries and refuse collection between 9:00 and 11:00, thereby avoiding disturbance to residents' sleep.
- One third of the Whitefriars apartments face onto an internal courtyard which acts as an echo chamber, meaning that any noise generated nearby appears to be amplified and causes considerable disturbance. As the basement unit sits partly below the courtyard, I am particularly concerned that noise from the restaurant will cause nuisance to residents in all of the apartments which face onto the courtyard.
- I understand from the applicant that they have not deemed it necessary to commission an acoustic report, with one justification for this being "the location of the premises below ground". This completely overlooks the fact that the premises are located immediately below 3 residential apartments. I would request that no consideration should be given to granting a licence until an acoustic report has been prepared and then only if the report shows that the noise impact to residents can be adequately managed.

2. Public Safety

The proposed restaurant would cause significant safety risks to ourselves and other Whitefriars residents as a result of:

Fire Risk

- We are very worried about the risk to our safety that will be posed by a restaurant kitchen in the basement below our apartment. Although various reassurances have been provided about the arrangements that will be in place to deal with fires, we do not believe that these can guarantee our safety and we do not see why the lives of the occupants of 60 residential apartments should be put at any risk, even if it is a low risk.
- One of the measures which the applicant has stated would address our safety concerns is that the restaurant's fire detection system would be connected to the building's fire alarm system. However **there is NO building fire alarm system**, so if that connection of systems is needed to assure the safety of residents, then we request that no consideration should be given to granting a licence unless the operators agree to pay for the installation of a suitable building fire alarm system to protect the lives of residents before the restaurant opens for business.

Security

- We are very concerned that the opening of a restaurant would introduce serious security risks for Whitefriars, with public accessing the building for the first time and well as restaurant staff and contractors. Although the premises has a separate entrance from the street, it has two fire exits which give direct access to the residential building including the car park: this introduces a risk of unauthorised access which could impact the safety of residents and their cars.

Summary of key points

- We request that this licence application be rejected on the grounds that the proposed restaurant would contravene the licensing objectives of Prevention of Public Nuisance and Public Safety.
- No consideration should be given to granting a licence unless the opening time is changed to 11:00 or later to allow a window for deliveries and refuse collection between 9:00 and 11:00.
- No consideration should be given to granting a licence until an acoustic report has been prepared and then only if the report shows that the noise impact to residents can be adequately managed.
- No consideration should be given to granting a licence unless the operators agree to pay for the installation of a suitable building fire alarm system to protect the lives of residents before the restaurant opens for business

Photo of Victoria House

The white entrance door on right hand side would be the only access point to the restaurant for all customers, staff, contractors, deliveries, refuse removal etc.

All the windows in this photo including the ground floor ones are the windows of residential apartments.



Restaurant Plan with apartment locations highlighted

This shows that the majority of the dining and kitchen areas sits directly below apartments.

