

Director of Planning,  
Camden Borough Council  
5 Pancras Square  
London,  
N1C 4AG

30<sup>th</sup> August 2018

Dear Sir/Madam,

**125 Shaftesbury Avenue, WC2H 8AD**

We are submitting through the Planning Portal an application for Planning Permission for external works to the above building in connection with the installation of new and replacement mechanical plant associated with the tenant fit out.

**Background**

The application building is not listed, nor does it sit within a conservation area. The Denmark conservation area is located immediately to the West of the site and the Seven Dials conservation area lies to the South-East. However, as described below, it is not considered that the proposals will have a negative effect on the Conservation Areas.

There are a number of listed buildings within the immediate vicinity of 125 Shaftesbury. The Odeon cinema to the North East and the Phoenix Theatre to the North West are Grade II listed as are buildings at 99A and 101 Charing Cross Road. The building is also in close proximity to St-Giles-in-the-fields church (Grade I) to the North and the Palace Theatre (Grade II\*) to the South. Again, it is considered that the proposals will not have any negative impact on the setting of these listed buildings.

The building is at present undergoing refurbishment works. As part of these works, the Landlord has replaced and augmented the mechanical installation within the building. This work has consolidated plant within a plant enclosure at seventh floor level (2018/1299/P).

Previous proposals for extensive remodeling of the building were submitted to Camden Council (2016/52202). This application has not been determined.

## Proposal

WeWork operate a brand of co-working office space and are due to take the tenancy of the entire building and as such require to carry out client fit out works in order to provide office space. As part of the fit out there is a requirement for additional mechanical plant to achieve their specific requirements. In addition to enclosed and open plan office areas, it is proposed to provide kitchen facilities on the second floor to be used as ancillary to the office space and only to serve the office and WeWork users. This installation has a further requirement for ventilation.

All new mechanical plant is proposed to be located to roof areas on the 1<sup>st</sup> and 8<sup>th</sup> floors, and will be surrounded by acoustic plant screens. The first floor roof is presently used for plant.

To the 8<sup>th</sup> floor an existing window is proposed to be replaced with access door and to the first floor several windows are proposed to be replaced with louvers to allow fresh air intake. The materials for these installations will be to match the existing and surrounding frames. The details are outlined on the enclosed drawings.

Although there were previous proposals to carry out major redevelopment works to the building, the decision has been taken to refurbish the existing building instead. Therefore rather than having the opportunity to address issues relating to the servicing of the building in a more comprehensive manner, there is a requirement to work within the confines of the existing building envelope. The original building having been constructed in accordance with planning permission granted in 1978.

The works are fully described in the enclosed drawings.

## Policy

Planning policy is set out at National and Local level. Sources of guidance relevant to the present proposals are:

- National Planning Policy Framework (NPPF)
- The London plan 2016
- Camden local plan July 2017
- Camden planning guidance 2017

National Planning Policy Framework (NPPF) was published 27th March 2012 by the government and sets out the national standards which require to be considered by individual Authorities when producing Local Planning guidance. It contains an overarching set of principles which must be

applied to all planning situations. The NPPF contains the outline within which Local Policy must sit, the guidance within NPPF therefore is primary.

NPPF recognises the importance of businesses uses on the local and national economy and the importance of allowing business operations to grow, develop and flourish. Clearly with regard to the current proposals, this is considered on a micro level. However, it is clear that the internal environment of a modern office is paramount to its ability to function and thrive.

### *Camden Local Plan (2017) Policies*

#### *A4 - noise and vibration*

There is a requirement to ensure that noise and vibration are considered at design stage. Permission will only be granted for plant and machinery where it can be operated without causing harm to amenity and will not result in unacceptable levels of noise or vibration.

#### *D2 - Heritage*

The Council will resist development outside conservation areas which will cause harm to the character or appearance of that conservation area.

#### *Camden Planning guidance – Design CPG1 (July 2015, updated March 2018)*

Para 11.6 – Services equipment in refurbishment works should be accommodated within the building structure, or incorporated into the design of external modifications

Building services equipment should:

- be incorporated into development
- have minimal affect on the environment; and
- Should not harm occupier or neighbour amenity

Plant and machinery located on roofs should not be visible from the street, public vantage points or from immediately adjacent buildings. Where screening is proposed to be used to minimise the visual effects of plant, this screening should not, in itself, cause visual blight.

The design and materials of plant enclosures should be in keeping with those of the building and safe access should be provided to allow maintenance and servicing.

## Conclusion

In accordance with Camden Local Planning Policy, plant has been incorporated within the building as far as possible, with vertical risers and plant being located within the building wherever possible with only sections of plant which require to be open to external air being proposed to the first and eighth floor roof spaces.

Proposed plant location to the roofs will not be visible from street level or from any long views to the building. The location on the 8<sup>th</sup> floor roof is to be set well back from the building edge meaning that the installation will not be within any sight lines, and ties in with the previously permitted enclosure to the seventh floor. As the host building steps up in height to the Northern side views from the North will be completely screened.

The building is in a built up area meaning that there are no impacts on long views within the surrounding area. This also means that there will be no adverse effects on views into the adjacent conservation areas.

It is proposed that the plant have attenuation to ensure that noise levels are minimum of 10dB(A) less than existing background levels (LA90) when measured at 1m from the nearest sensitive building. Further, where required, plant will be mounted on suitable vibration isolators to minimise structure-borne noise and vibration transfer.

The location of the installations have been considered to be the most discreet solution whilst working within the confines of the existing building.

It is considered that the proposed installation accords with council policy as set out above.

We believe that the accompanying material sufficiently outlines the proposals. However, should you require any further information please do not hesitate to contact me.

Yours faithfully,



for and on behalf of Left City Ltd.