

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

20th December 2018

Dear Sir/Madam,

Aviation House, 127 Kingsway, London WC2B 6NH

We are submitting through the Planning Portal a retrospective application for Planning Permission for installation of external plant and accompanying acoustic enclosure to the rear of the above building in connection with the recent tenant fit out for WeWork.

Background

125 Kingsway is grade II listed, though substantial works to the building result in only the façade of the original church remaining, facing out to Kingsway. None of the proposed works have a direct impact on the retained façade. The building is within Camden Council area and also within the Kingsway Conservation area.

The site at 125 + 127 Kingsway was extensively redeveloped following grant of planning permission in July 1999, for demolition of the church (retaining the façade) and building of new office building. (PS9805223)

Proposal

WeWork operate a brand of co-working office space and have carried out extensive fit out works to the property on Kingsway. As part of the fit out there is a requirement for the updating of the mechanical installation in order to cater for the needs of the building users in line with current standards and expectations.

The plant to be installed is to replace old and outdated plant which previously sat in similar location. The previous plant was installed by the last tenant of the building. We are not aware of the planning history of the plant which was in this location, though it does appear to have been in place for considerable time without causing nuisance, either through the level of noise, or visual impact. The location of the previous plant installation is indicated on the accompanying drawings along with photographs taken at the time of the initial survey of the building prior to the commencement of the WeWork fit out.

The location of the new external plant has been carefully considered to be in the least obtrusive location. The location is at basement level, it is screened from view and will not have a negative impact on the views from adjacent properties. Further, the location to the rear of the 1990s building will mean that there is no negative impact on the heritage status of the Listed Building.

It is recognised that the noise levels of the plant in operation is outwith the requirements of the Camden Local Plan and noise disturbance policies. For this reason, acoustic screening measures have been proposed in order to attenuate the plant to a level which is not deemed to be a nuisance to the surrounding residential neighbours. The extent of the required acoustic screening is shown on the accompanying drawings

The works are fully described in the enclosed drawings and technical specifications. Heritage Statement showing how the works relate to the Listed Building accompanies the application for Listed Building Consent.

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 July 2018 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.

The acoustic report and mitigation measures proposed by way of acoustic screening will bring the level of noise from the plant installation to a level which is deemed not to cause a nuisance.

D2 - Heritage

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

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.

The location of the current plan installation has been carefully considered to be in the least obtrusive location possible. It is not visible from the street or neighbouring buildings.

Conclusion

In accordance with Camden Local Planning Policy, plant has been incorporated within the building and existing plant enclosures as far as possible. The current proposals seek to gain permission for external units where these need to be open to the external air and therefore cannot be incorporated within the existing building envelope.

It is considered that the proposed installation accords with council policy as set out above. We feel the application demonstrates that the installation will not have a negative effect on the heritage status of the building, nor will it have detrimental effect on the amenity of surrounding neighbours.

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

Yours faithfully,



for and on behalf of Left City Ltd.