

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

22nd November 2018

Dear Sir/Madam,

26-27 Hatton Garden, London EC1N 8BR

We are submitting through the Planning Portal an application for Planning Permission for the installation of new external plant beneath existing stair to the front light well of the building and other external works in connection with the installation of new mechanical plant associated with the tenant fit out.

Background

The application building is not listed though is a building of local note and sits within the Hatton Garden Conservation Area. It is proposed that the location of the proposed works will have no demonstrable effect on the Conservation Area and its setting.

The building has recently undergone extensive refurbishment works including remodeling and infilling of light wells and rooftop extension. Application 2016/2181/P, granted 10th March 2017.

Proposal

WeWork operate a brand of co-working office space and are due to take the tenancy of the building and as such require to carry out client fit out works in order to provide office space. As part of this fit out there is a requirement to install mechanical ventilation equipment. Mechanical equipment is to be primarily installed within the designated plant enclosure on the fifth floor, and as such complies with conditions 5 and 6 of application 2016/2181/P.

It is required that louvers be installed to each floor plate $(2^{nd}, 3^{rd} \text{ and } 4^{th})$ to permit fresh air intake and exhaust to serve internally located mechanical equipment. The location for the louvers is proposed as being within the remodeled light well to the North of the building. This location is not visible from the street, only being open to the rear, therefore having limited, if any visual impact.

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Within the basement floor there is a requirement to install heat recovery unit within open air. The location proposed for this unit is within the light well to the front of the building, sitting against the pavement wall and beneath the existing stair, and therefore obscured from view. The installation of this unit requires minor alterations to be made to existing window to provide access to the unit for maintenance and also to allow ducts to pass into the office space. One of the proposed plant or ducting will sit higher than the height of the existing stair and so will be screened from view.

The works are fully described in the enclosed drawings. Existing and proposed drawings for the fifth floor showing the plant installation are included for information only, the equipment shown is installed in accordance with the original permission 2016/2181/P and demonstrates only that plant has been incorporated within the existing building as far as possible.

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

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amenity and will not result in unacceptable levels of noise or vibration.

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.

It is held that in adhering to conditions 5 and 6 of the original planning permission for the building, any acoustic issues are mitigated. The location of the proposed louvers will have no detrimental visual impact.

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 only to locate plant in discreet location where it cannot be housed within the building and to provide termination points for sections of plant which require to be open to the external air.

The location of the louvers has been carefully considered to be in the least obtrusive location possible. The location will not cause any detrimental visual impact. The proposals will also be in keeping with the recommendations made in the acoustic report which accompanied the application for the extensive refurbishment of the building (2016/2181/P) and as such will have no greater acoustic disturbance than has already been deemed acceptable.

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We note that all plant installation to the existing plant enclosure will comply with conditions 5 and 6 of the recent planning application (2016/2181/P) in terms of the acoustic isolation and attenuation. These are listed below.

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.

Conditions 5 and 6 taken from application 2016/2181/P, with which the main plant housed within the existing plant enclosure referred to in this application will adhere to:

Condition 5 - Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Condition 6 - Before the air conditioning units hereby approved are brought into operation they shall be provided with acoustic isolation and sound attenuation in accordance with paragraphs 4.7 and 4.9 of the submitted "Acoustic Noise Report, REPORT 7346/AAR, Revision 01 26th August 2016, by RBA Acoustics hereby approved by the Council. The acoustic isolation shall thereafter be retained in effective order to the reasonable satisfaction of the Council.