

Josh Lawlor  
Appeals & Enforcement team  
Regeneration and Planning  
London Borough of Camden  
Floor 2, 5 Pancras Square  
London  
NIC 4AG

Dear Mr. Lawlor,

Re. 2018/6267/P at Aviation House 125 Kingsway London WC2B 6NH (doors to access 1st floor flat roof, over-cladding of balustrading etc.).

Covent Garden Community Association (CGCA) **objects** to the elements of this application that bring into busy, constant daily use by office workers what has, until now, been a quiet lightwell area. Our comments do not address other elements of the application.

Such use would inevitably cause problems associated with noise and smoke in an enclosed space that backs onto 40 flats at Aria House, and where sound carries across to 30 flats at Holland & Thurston Dwellings nearby. The space is a noise canyon and many of the surrounding flats are occupied by families with children.

Below we show a picture of residential units in relation to the flat roof within a lightwell that is proposed to be adapted for use as a terrace through the alterations applied for under this application.



40 flats at Aria House, within close sight of, and affected by smoke and by noise from proposed terrace in enclosed area subject to sound amplification.

Proposed terrace on flat roof with access from 1st Floor of Aviation House.

The applicant is 'WeWork', a serviced office company whose business model is short term rental of desk space and communal social areas. The large, refurbished building at Aviation House will therefore be occupied by hundreds of different tenants for short periods of time.

**Covent Garden Community Association, continued...**

Such tenants are typically difficult to manage, because they are self-employed or work for very small companies with no common procedures, and they do not stay long to understand the residential nature of the neighbourhood. If an external area is allowed to be used, it is therefore likely to be occupied constantly because these tenants and their guests will have a variety of different schedules. Noise and smoke is therefore likely to be fairly unremitting throughout any permitted hours of use.

We are further concerned about this particular applicant's ability or willingness to manage anything in the interests of their neighbours as a result of the truly eye-watering disregard that they have had so far. After the meeting with senior council officers, councillors and residents at Dragon Hall on 17/09/2018, the planning authority is in no doubt about the failure of the site and its contractors to adhere to any regulated hours of work or considerate behaviour. Such breaches continue, day and night, with additional complaints only this month.

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The applicant included these proposals in a previous application ref. 2018/3590/P. The applicant's covering letter states that the reapplication seeks to address concerns about that. However, we cannot see where the concerns that we and local people expressed have been addressed in relation to the proposal to turn the first floor lightwell area into a terrace. The hours of use are the same, ie: 8am to 6pm Monday to Saturday (although not stated in the application form), and nothing is mentioned in relation to noise baffling or prevention of smoking.

We ask you to refuse this application as a grant of permission would go against Camden Local Plan Policy TC4 by causing harm to the amenity of neighbouring residents.

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If, however, the planning authority were minded to grant consent despite policy reservations and heartfelt local objections, then we ask that any permission would at the very least be subject to strict conditions on hours, use and mitigation measures:

1. The hours of use of the terrace to be no more than 9am to 5pm Monday to Friday only. The applicant has offered 8am to 6pm Monday to Saturday, but this is not acceptable to families living all around for obvious reasons. Any breach should lead to use of that terrace being suspended for 1 year.
2. The 1<sup>st</sup> floor terrace to have planting installed throughout, subject to exacting standards of maintenance. The reason for this is the deep, enclosed space that it occupies, causing every sound to echo and carry to the flats at Aria House alongside.
3. The 1<sup>st</sup> floor terrace to have no smoking permitted at any time. The reason for this is the proximity of residential windows in the enclosed space.
4. No furniture to be permitted on the 1<sup>st</sup> floor terrace.

Thank you for consideration of these matters, which involve serious impact on the health and wellbeing of our community. It is a community already under huge pressure from commercial interests and we ask you not to act in any way that would increase this pressure.

Yours sincerely,

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Elizabeth Bax  
Chair, CGCA Planning Subcommittee

