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Dear Ms Fieldsend,

88 Kingsway, High Holborn, London, WC2B 6AA
Application for Full Planning Permission for Rooftop Plant
Planning Portal Reference: PP-09134054

On behalf of our client, Holborn Station Property Ltd, please find enclosed a planning application for:

'Provision of new plant at roof level and associated plant screens'

In addition to this covering letter please find enclosed the following supporting documents:

- Site Plan prepared by Rolfe Judd;
- Design Document prepared by Rolfe Judd;
- Existing and Proposed Drawings prepared by Rolfe Judd;
- Noise Impact Assessment prepared by Scotch Partners; and
- Planning Application Form prepared by Savills.

Introduction

88 Kingsway sits within the London Borough of Camden, within the Kingsway Conservation Area. The London County Council created The Kingsway Conservation Area at the turn of the 20th century, sandwiched between Lincoln's Inn and Covent Garden, between the City and the West End, creating a link between central London and south of the River Thames.

The property is an existing office building which is no longer fit for purpose, and the Applicant seeks to holistically upgrade the existing building to provide high quality office space to secure the future use of the building. This application proposes new plant and associated screening at roof level to enable the

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modernisation of the office building.. This application is submitted as part of a drive to enhance the building's usability and create a more positive working environment for those who occupy it.

As part of the comprehensive refurbishment of 88 Kingsway, the applicant has also submitted a planning application and advertisement consent application including new entrance doors and signage, access to terrace space on the existing gantries, new fire doors and fire glazing which are currently under determination (LPA refs: 2020/3969/P and 2020/4484/A).

Site & Surroundings

88 Kingsway was completed around 1906 in the Edwardian style which defines much of the Conservation Area. The building includes the Holborn Station Entrances with the main entrance off of Kingsway Road and a smaller entrance off of High Holborn. The original station and surrounding lower levels which were originally designed by Leslie Green using his typical grand arched bay frontages. Uniquely, 88 Kingsway is constructed in stone rather than the standard red glazed terracotta typically employed in the rest of Green's stations of the era. This was due to planning regulations imposed by the London County Council which required the use of stone for façades in Kingsway.

The station entrance and exit sections of the street façade were constructed in granite with the other parts of the ground, first and upper floors in the same style, but using Portland stone. Located at the junction of two earlier tube railway schemes, the station was opened by the Great Northern, Piccadilly and Brompton Railway (GNP&BR). Holborn Station was modernised in the early 1930s to replace the lifts with escalators. The station frontages on Kingsway and High Holborn were partially reconstructed to modernist designs by Charles Holden with the granite elements replaced with plain Portland stone façades perforated with glazed screens.

The site comprises an existing seven storey office building, situated within the London Borough of Camden. The building itself is not listed, however the site is located within the Kingsway Conservation Area. The Camden Policies Map notes that the property is a Central London Frontage, and a primary Protected Frontage.

The position as a CLF recognises the role of the property as a shopping and service centre for workers and residents. High Holborn is predominately a commercial area, with a very small residential community. To the north of the site is King's Cross, to the east is Holborn station, to the south is the Strand, and to the west is Oxford Circus.

Planning History

Following a review of the London Borough of Camden's online planning register there is no relevant planning history on the site.

Proposed Development

As noted above, as part of the comprehensive refurbishment of 88 Kingsway, the applicant has submitted a planning application and advertisement consent application for 88 Kingsway which are currently under determination (LPA refs: 2020/3969/P and 2020/4484/A).

The proposals in this application include new plant at the roof level along with associated plant screening that has been sympathetically designed to respond to the surrounding area, both visually and acoustically. The proposed plant at roof level is required to ensure that the building is capable of providing a modern environment for the occupants and ensure that it meets the Grade A office standard.

In terms of appearance, the plant screens are proposed to be set back as far as possible from the edge of the roof, and their location has been determined following a number of options being tested by the design team to ensure that any potential impact is minimised. The screens are proposed to be 2.3 metres in height in order to match the maximum height of the plant equipment. They have been designed to ensure that they are the lowest possible height whilst still providing visual and acoustic screening of the plant and minimal impact on the surrounding townscape. The accompanying Design Document prepared by Rolfe Judd architects presents a number of VU.City images showing the minimal impact of the proposals on the surrounding area from street level. . The proposed louvres are light grey in order to minimise the visual impact on the surrounding area as they blend in with the sky. The louvres are horizontal and minimalist in detail which contrasts with the vertical nature of the chimneys

In terms of minimising any noise impact, acoustic plant screening is proposed. The accompanying Noise Impact Assessment prepared by Scotch Partners concludes that the proposals are considered compliant with adopted planning policy. .

The proposals for rooftop plant are directly related to the refurbishment of the internal office space to facilitate the operation of a modern and inviting office space in a key central London location.

Planning Policy Considerations

In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless other material considerations indicate otherwise.

In this instance, the development plan comprises:

- The London Plan (2016);

- The Camden Local Plan (2017); and
- The Camden Policies Map (2019).

Other material planning considerations include:

- National Planning Policy Framework (2019);
- National Planning Policy Guidance (2019); and
- Intend to Publish Draft London Plan (2019).

The remainder of this letter will identify the key planning considerations of policy related to the proposals.

Principle of Development

Policy E1 Economic Development from The Camden Local Plan illustrates that the Council will support businesses of all sizes, but maintaining a stock of premises that are suitable for a variety of business activities, whilst directing offices to growth area, including Central London where the site within this proposal is located. The proposals within this application seek to enhance the office use of the premises and is therefore in line with the policy requirements of the local Council.

The Camden Local Plan Policy G1 names Holborn as an area where development with the most significant growth is expected to be delivered. The Council also sets out their aspirations for the area within the Core Strategy, which includes:

“provision of a mix of land uses, with offices and housing as the predominant uses”

The proposal contributes to the aspirations of the area by enhancing the quality of the office space, which in turn increases the desirability of the office space. The modernisation of the plant is expected to attract further demand to the property in this vibrant and core office location. By encouraging the continued office use of the property, the proposal aligns with planning policy with regards to the principle of development.

The London Plan states in Policy 4.2 Offices that the Mayor and boroughs should:

“encourage renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility”

As such, the proposal is compliant with both local and GLA policy, as it aims to modernise an existing office building to improve its quality by bringing the frontage up to modern design and quality standards.

Design & Conservation Area

Policy D1 Design of The Camden Local Plan sets out a list of requirements for proposals. Those which are relevant to this application can be seen below. The Council will require that development:

- a. respects local context and character;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*

The Camden Local Plan also makes clear the importance of design within Holborn. The policy document illustrates that the Council are seeking:

“high quality, sustainable design that respects its surroundings and preserves and enhances the area’s historic environment”

The proposed development uses high quality materials for the plant screen at roof level that has been designed to respect its surroundings. Various options for positioning the required plant were tested by the design team throughout the design development process, including an option to stack the plant to move it further away from the edge of the building, however this option was discounted as it would have resulted in a taller plant screen, as well as for structural reasons.

Noise

Camden’s Local Plan Policy A4 Noise and Vibration states that planning permission will not be granted for:

- *Development likely to generate unacceptable noise and vibration impacts; or*
- *Development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.*

In support of this application, a Noise Impact Assessment, prepared by Scotch Partners has been submitted. It assesses the proposed plant against the requirements of Camden’s Policy A4 Noise and Vibration. The

rating levels at the nearest noise-sensitive receivers are expected to range between 11dB and 19dB below the prevailing background noise levels.

The Noise Impact Assessment represented a worst-case scenario and assumes that all of the plant operating simultaneously at the quietest time of the day. Notwithstanding this, the assessment concluded that the noise levels are compliant with Camden's most onerous design threshold and are therefore compliant with Camden's planning requirements. We therefore consider the proposals to be in line with Local Plan policy.

Conclusion

The proposals for roof top plant and associated plant screen will enhance the usability of the office space and significantly enhance the quality of the floorspace, making it fit for purpose long into the future, and enabling the office use to attract occupiers to the building within this key Central London location. The proposed plant at roof level and associated screens have been designed to respond to the existing townscape and to minimise any visual or acoustic impacts on the surrounding area.

I trust you have all the necessary information required to validate this planning application, and I look forwarding to receiving confirmation soon. Should you have any queries, please feel free to contact me or my colleague Alice Kennedy (akennedy@savills.com / 020 3320 8285) using the information in the head of this letter.

Yours sincerely,

A handwritten signature in grey ink that reads "Savills".

Molly Morris
Graduate Planner