

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/4924/P	Antony Travers	14/01/2024 14:23:56	OBJNOT	Comments on planning application at 15, Warren Mews, W1T 6AZ [Application number 2023/4924/P]

The planning application considered below concerns the installation of two air conditioning units and an air pump at the above address. Two sets of consultants have been contracted by the applicant: Totem+Studio London and Inhabit.

Specific observations on the documents published:

The project's 'Design and Access Statement', prepared by Totem+Studio London, states the company "have been instructed....to submit a Planning Pre- Application for the alterations to 15 Warren Mews W1". However, there is no such status as 'planning pre-application': it is possible to apply for outline planning permission, though this is usually only used for major projects. Some consultants offer 'pre-planning' advice, but this is a private service, not a council process. Camden's website describes the project proposal as a "planning application".

Totem+ Studio's 'pre-application' states: "Permission is sought for the installation of 2no. Air conditioning condensing units housed within acoustic attenuation boxes, mounted over the rear roof pitch of the building. Citing [sic] the new units in this location means that they are completely concealed from all inhabitants of the mews and from neighbouring streets."

There is no mention in Totem's report of a heat pump or its location. The Totem+Studio document goes on to note: "Inhabit M+E Engineers have undertaken a Noise Impact assessment which is submitted with this application".

Inhabit's noise impact assessment cites part of Camden's 2017 Local Plan, though it does so by referring to "Policy A4 from 'Camden Local Plan', February 2022 by the Royal Borough of Kensington and Chelsea". It is not made clear what role the Royal Borough of Kensington and Chelsea has in Camden's local plan, though Camden's Local Plan 2017 makes no mention of the Royal Borough. Indeed, boroughs other than Camden have no direct role in setting Camden planning policy. This is true of all other London boroughs in relation to other boroughs local plans. Importantly, Camden has no boundary with RBKC.

Inhabit excludes from its report a key section of Camden's Local Plan which states:

"Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced".

Inhabit's report does, however, observe: "The refurbishment's proposal includes the installation of 1No. Air Source Heat Pump (ASHP) on the pitched roof of the property." There is no mention of air conditioning units.

Thus, Totem+ Studio's report refers only to air conditioning units, but not to a heat pump, while Inhabit's report refers to a heat pump but not to air conditioning units. Air conditioning units make noise.

Application No: Consultees Name: Received:

Comment: Response:

Camden's amended policy on air-conditioning units [not cited by either consultant] states:
 "A noise, vibration and ventilation assessment should include the following information:...the system manufacturers specification of the proposed equipment to be installed, altered or replaced".

Yet Inhabit's report makes clear "The unit has not been selected at the current design stage". The planning proposal thus does not comply in a number of ways with Camden's published policy.

General observations

The comments above are in relation to the documentation submitted in support of the planning application. On the assumption the project will not be allowed to go ahead on the basis of the currently submitted documents, there are several issues raised which would need to be addressed if and when an amended application is made.

Location of air-conditioning units and/or air pumps and noise

The proposed new units are to be located on the rear [western] side of the roof of 15, Warren Mews. This would make the additional noise generated by the air-conditioning units and air pump(s) audible to residents of some properties in Warren Street and Cleveland Street, but not audible (or very much less so) to those actually working in 15, Warren Mews. The new mechanical units will be located as little as 10-20 metres from upper floor rooms of four or five residential properties. Moreover, the proximity of these existing buildings on a corner in a city centre leads to greater 'echo' effects than would be the case elsewhere. A more appropriate location would be at the front of the property, at street level. Here, mechanical units could be hidden elegantly behind plants which would also reduce any noise impact. 15, Warren Mews is not a listed building.

Hours of operation

Inhabit's report states: "It is assumed that the unit will be operating during only daytime hours (0700-2300). Even in mid-summer 2300 is not "daytime". The business applying for permission to instal air-conditioning currently opens at 0930 Monday to Friday and at 1100 on Saturday. Closing times range from 1700 to 2000, though on three weekdays the business closes at 1800. Any planning permission for new audible mechanical equipment should be limited to the hours from 0900 (at the earliest) to 2000 at the latest.

Visual impact

Totem+Studio state: "Citing the new units in this location [on the roof at the back of the building] means that they are completely concealed from all inhabitants of the mews and from neighbouring streets. However, the units would be easily visible from several properties in Warren Street and Cleveland Street. It is unclear why the amenity of those living in the mews [generally not listed] is accorded greater importance than residents who live much closer in listed buildings. The framing of the view from domestic properties in this part of Warren Street and Cleveland Street is aesthetically attractive, having preserved many elements of a cityscape which would have appeared virtually the same in 1800.

I would be happy to expand on these observations in writing and/or to attend any relevant planning committee hearing.