

Re: Planning application No: 2014-5179-P

Dear Sam Watts.

With reference to the above planning application to install air-conditioning units at 59 Mill Lane, London NW6 1NB, I would like to draw your attention to the council's own 'Camden Planning Guidance 1 Design'.

Please find enclosed the relevant pages from this guidance. I hope that when making a decision on the above application, the Planning Guidance is very seriously taken into account. I have taken the liberty of highlighting the particular relevant points, which apply to this application and which are:

The "Key Messages" of this Guidance:

States that "Building services equipment should. . . .not harm neighbour amenity." I think the key word here is 'amenity'. I apologize if I come across as overly pedantic about the meaning of the word, but sometimes words can be interpreted differently by different people. In this case amenity must surely mean the pleasantness or attractiveness of a place.

I feel that the installation of three air-conditioning units will surely harm the pleasantness and attractiveness of the place from my point of view, being a neighbour who's bedroom window directly overlooks the proposed area.

Paragraph 11.1 of the Guidance:

Correctly assesses that "Building services equipment. . .can cause significant visual blight and nuisance for neighbours."

This is a confirmation of my point above.

Paragraph 11.2 of the Guidance:

Goes further by saying that the Guidance should ensure that services equipment has “minimal impact on the environment. Impacts . . . include visual blight, light nuisance, noise nuisance and vibration.”

So apart from the visual blight as mentioned above, the proposed air conditioners may also cause noise nuisance and vibration. This may not be overly problematic initially as I’m sure there are very quiet air conditioning units available. However as time passes, and these units become old or need servicing, this could become a much more audible and severe problem, which Camden Planning Department would maybe have very little authority to resolve.

Paragraph 11.7 of the Guidance:

Goes on to specify that “Screening or other techniques to minimize the impacts of plant, machinery and ducting must, in themselves, not cause visual blight.” So even if it were suggested that some form of covering or camouflage could be used to diminish the visual blight caused, this, I feel would in itself, be a visual blight.

The most important part of the whole Guidance, which is highlighted in red is; “ Plant and machinery on roofs should not be visible from immediately adjacent buildings.”

I think I should qualify the “adjacent buildings” by adding that it would be particularly wrong if the adjacent buildings were residential adjacent buildings, as is the case in this circumstance.

Paragraph 11.8 of the Guidance:

Re states that “Where ducting, plant or machinery are required on the outside of a building they must not provide nuisance for occupants of adjacent buildings.”

This goes on to clarify that machinery placed anywhere on the outside of the building, and not just that which is placed on the roof, must not cause a nuisance to adjacent buildings, and this would again be applicable to myself.

Paragraph 11.12 of the Guidance:

“Machinery must be properly installed and maintained to ensure that impacts are properly mitigated and the situation does not deteriorate over time with continued operation.”

The machinery may well be properly installed initially, but whether it will be maintained in the long term is very debatable, and moreover, very uncertain. As I mentioned earlier, would the Planning Department be able to quickly resolve the issue if in the future the machinery becomes a problem due to maintenance neglect?

Overall, if the committee that considers the above planning application, adheres by the Camden Planning Guidance, they must surely refuse the permission of the installation of the air conditioning units.

Yours sincerely.

11 Building services equipment

KEY MESSAGES

Building services equipment should:

- be incorporated into development;
- have a minimal impact on the environment; and
- Should not harm occupant or neighbour amenity.

- 11.1 **Building services equipment**, whether it is used for heating and cooling, communications, power, plumbing, ventilation, access or security, if not considered appropriately, **can cause significant visual blight and nuisance for neighbours**.
- 11.2 The purpose of this guidance is to ensure that necessary building services equipment can be incorporated into development, while having **minimal impacts on their environment**. Impacts that are likely to require minimisation or mitigation **include visual blight, light nuisance, noise nuisance and vibration**, odour, and other environmental pollutants or nuisance.
- 11.3 This guidance relates to Camden Development Policy DP24 Securing high quality design, DP26 Managing the impact of development on occupiers and neighbours and DP28 Noise and vibration.
- 11.4 This guidance does not specifically apply to renewable energy installations, or telecommunications as they are considered in other guidance but principles may be the same. For further information see CPG3 Sustainability (Energy efficiency: existing buildings, Energy efficiency: new buildings and Renewable energy chapters) and PPG8: Telecommunications.

How should building services equipment be treated?

Design considerations

- 11.5 In new development, all building services equipment:
- must be integrated within the building or development structure;
 - must be incorporated into the external building design where, because of its nature, it cannot be integrated within the building; and
 - should not be a dominant feature of the building.
- 11.6 In refurbished development, plant and machinery should be accommodated within the building structure, or incorporated into the design of external modifications.
- 11.7 Other design considerations for building services equipment include:
- **screening or other techniques to minimise the impacts of plant, machinery and ducting must, in themselves, not cause visual blight**

- plant and machinery on roofs should not be visible from the street, public vantage points or from immediately adjacent buildings;
- the design and materials used for plant, machinery and ducting, as well as for ancillary structures such as screening, where located on the exterior of the building, must be consistent with those of the building; and
- where possible, plant and machinery should be designed in such a way that does not lead to issues of safety and security.

Amenity

- 11.8 Where ducting, plant or machinery are required on the outside of a building they must not obscure access to daylight and sunlight, or provide any nuisance for occupants of the development or adjacent buildings.
- 11.9 Plant and machinery with moving parts must be separated or insulated from occupants and neighbours who are likely to be sensitive to noise disturbance. Techniques to achieve this separation include the use of flexible ducting, or resilient mountings for structure-borne plant and machinery.
- 11.10 Where mechanical or passive ventilation is required to remove odour emissions, the release point for odours must be located above the roofline of the building and, where possible, adjacent buildings.

Sustainability

- 11.11 Plant and machinery, particularly where located on roofs, must not preclude the installation of required onsite renewable energy facilities in the proposal. Consideration must also be given to the possibility of future renewable energy installations.

Conservation areas and listed buildings

- 11.12 Special consideration should be given to the installation of plant, machinery and ducting on listed buildings and in conservation areas. Fewer external solutions are likely to be appropriate in these locations. Installations must be in keeping with the design and materials of the building. Listed building consent is likely to be required for works to a listed building.

Other considerations

- Access to plant and machinery must be provided to allow for convenient and safe servicing and replacement of installations;
- Machinery must be properly installed and maintained to ensure that impacts are properly mitigated and the situation does not deteriorate over time with continued operation.
- Plant and machinery should be located as close as possible to their end use, e.g. boilers should be located near to the hot water or

heating users, to minimise use of ducting materials, loss of resource and visual blight.

- Disused plant, machinery and ducting must be removed from the exterior of buildings before replacements can be installed. Only in exceptional circumstances will these be allowed to remain.