

Application No:	Consultees Name:	Received:	Comment:	Response:
2018/6335/P	Elizabeth Bax, Covent Garden Community Association	18/02/2019 21:54:40	OBJNOT	<p>The Covent Garden Community Association (CGCA) OBJECTS to this application on the grounds of loss of residential amenity from unacceptable disturbance in adjoining family flats. These are not 'minor alterations' as far as neighbouring residents are concerned, who will have to live with the impact possibly for the rest of their lives. We believe that permission should be refused because the equipment cannot be operated without causing harm to amenity and without resulting in unacceptable levels of noise / vibration.</p> <p>It should be noted that the application has been made retrospectively, and at a development site that has been causing serious problems for over a year. The applicant has flouted good practice and working standards so many times that we cannot begin to list them here. However, the council has been called out to a number of the worst instances, which have been logged. A public meeting was held on 17/09/18, attended by a number of senior officers including David Joyce (Director of regeneration & planning) at which Aviation House was highlighted as one of the worst offenders in terms of working out of hours and without consent.</p> <p>We believe that, in addition to the policy reasons for refusing this application, refusal would send a clear signal that the applicant cannot continue to mock the council and local people as it has to date in this way.</p> <p>Before setting out our detailed comments, we draw attention to the location of the equipment. This is very close to flats in Holland & Thurston dwellings, Hayden House and Aria House. Many families with children live here, as well as vulnerable people. The equipment lies immediately behind the flats. In the centre of London people rely on the rear of their buildings offering some peaceful relief from the busy streets.</p> <p>- Aerial view</p> <p>- View from equipment location (using photograph from Design, Access and Heritage Statement)</p> <p>In concrete terms, our comments are:</p> <ol style="list-style-type: none"> 1. The plant and equipment has already caused noise nuisance and should not be allowed in its current form or location. <p>The application form states that work started on 24/09/2018, however it was being used and caused problems earlier than that as residents have reported to the council.</p> <p>None of the data provided with the application shows that the addition of acoustic enclosure will be sufficient to attenuate this.</p> <ol style="list-style-type: none"> 2. Despite many pages of reports showing decibel figures, the conclusion is that: <ol style="list-style-type: none"> a) that the equipment is too noisy but b) the proposed acoustic enclosure is hoped to bring it into line. <p>Indeed, the applicant's own covering letter states that "the noise levels of the plant in operation is outwith the requirements of the Camden Local Plan and noise disturbance policies. For this reason, acoustic screening measures have been proposed in order to attenuate the plant to a level which is not deemed to be a nuisance</p>

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to the surrounding residential neighbours.”

Nowhere is data given that shows details of the acoustic enclosure, manufacturer or measurable effect. In the Noise Impact Assessment wording is used like “the enclosure should provide sufficient attenuation” and “the proposed plant installation with acoustic enclosure would be expected to meet the requirements”. This is an expression of hope, not of hard data! People living right beside and above the equipment need certainty when they will have to live with this for years.

3. Readings were taken much further from the equipment than neighbouring residential windows, and would need to be repeated near Thurston Dwellings to support any revised application.

- This picture shows the relative positions:

4. The proposed operating hours of 6am to 11pm daily are too long in this densely residential spot. Equipment in this location, unless it runs silently outside any enclosure, should only run 8am – 6pm Monday to Friday, 8am – 1pm on Saturdays and not at all on Sundays.

In conclusion, CGCA asks that you refuse this application in its current form.

We accept that air handling is an amenity that would benefit the business occupiers of the shared office building at Aviation House, but it must not be at the expense of the amenities that are basic needs for long term residents of the area where they are already subject to so much commercial pressure.

We suggest that a revised scheme be applied for, involving equipment placed in a less sensitive location (perhaps on the roof) and operating at limited times as outlined above.

PLEASE REFER TO FULL LETTER OF OBJECTION, INCLUDING MARKED-UP PHOTOGRAPHS.