

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/5329/P	Covent Garden Community Association (Elizabeth Bax, Chair of Planning Subcommittee)	24/01/2021 22:04:58	OBJNOT	<p>Covent Garden Community Association (CGCA) objects to the proposed development.</p> <p>With the advent of Class E we are starting to see, as expected, rapid conversions to restaurant use. If we imagine a scenario where even only half the current A1-use units in Covent Garden become restaurants, then the proliferation of air handling and extraction equipment could be considerable. There is potential impact on each neighbour located very close by. There is also cumulative impact upon the neighbourhood.</p> <p>In the case of this application, we ask that you refuse it and ask the applicant instead to install equipment that uses an internal recirculating air filtration system, requiring no parts external to the building. Our reasons are outlined below.</p> <p>The proposed scheme involves a large duct (cross-section 800 x 450mm) running vertically up the 4th floor of the building, which then turns a corner and runs horizontally at that level before turning again and running up the roof to allow fumes to drift into the air. The roof is at 5th floor level, and adjoins a modern building at 125 Shaftesbury Avenue that is terraced from 5th to 10th floor level. 125 Shaftesbury Avenue has outdoor space on each upper level, including space at 6th and 7th floor level that overlooks the application site. Under proposed Permitted Development rights this office building could be converted to residential use, further increasing its sensitivity as a neighbour.</p> <p>If extraction equipment is entirely internal, it is the best solution for everyone because it avoids:</p> <ol style="list-style-type: none"> 1. Unsightly equipment. 2. Noise and odour outside that has a detrimental impact on neighbours. 3. Air pollution. 4. Difficult access for maintenance, resulting in increased costs and/or likely noise, odour and pollution issues. <p>There are restaurants in Covent Garden that already use internal systems to filter and recycle air, for example Seven Dials Market in Earlham Street and Le Bab on Mercer Street (in Westminster). Providers include: https://www.reco-air.com/ and https://www.premierrestaurantengineering.co.uk/canopyairrecirculationextractor.html (which is suitable for gas).</p> <p>Camden's policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. An internal recirculating air filtration system achieves this.</p> <p>Camden's Local Plan paragraph 7.34 states that building services equipment, such as ventilation and extraction systems, should be contained within the envelope of a building or be located in a visually inconspicuous position.</p> <p>Camden's Local Plan paragraph 8.39 discourages the use of air conditioning and excessive mechanical plant. In a building that is being newly converted from a shop to a restaurant, we believe that any plant that spills outside the building is excessive because it is reasonable to incorporate internal plant as part of the new internal fit-out.</p>

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Should you be minded to grant consent for equipment external to the building despite these arguments, we ask you to apply planning conditions to protect against the problems listed above.

In addition to your usual conditions to protect against noise, we ask for conditions that achieve the following:

- Allow use of the equipment only from the start of Licensing Framework Hours until 60 minutes before their end, or less, ie: 10am-10.30pm Monday to Thursday, 10am-11pm Friday and Saturday, 11am-9.30pm Sunday. The reason for this is that equipment will not be required outside these times, and background noise falls considerably then. We have discovered, in Covid lockdown, just how very much air handling equipment in the area makes an unreasonably loud noise. Use of a timer seems sensible, to be permanently retained and maintained in accordance with the manufacturer's recommendations. This would safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, TC1, TC2, TC4 and A4 of Camden's Local Plan, in particular paragraph 6.99 which states that planning conditions will be imposed to require that plant and equipment which may be a source of noise is kept working efficiently and within the required noise limits and time restrictions.

- Require a cleaning and maintenance contract for the intake and extract systems and odour control system. Approved details should be implemented prior to occupation of the development and thereafter be permanently retained to safeguard the amenities of adjoining premises and the area generally in accordance with the requirements of policy A1 of Camden's Local Plan.
