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Dear Sir/Madam,

**APPLICATION FOR HOUSEHOLDER PLANNING PERMISSION: FLAT 1 AND FLAT 2, 24 PRIORY ROAD, LONDON, NW6 4SG**

On behalf of Mr Alex Balcombe and Mrs Charlie Balcombe, we hereby apply for planning permission for development comprising the installation of an air conditioning unit and related acoustic enclosure at lower ground floor level, on the rear façade of Flat 1.

The recent planning history for no. 24 Priory Road is relevant here. Planning permission was granted for the amalgamation of Flat 1 and Flat 2 in March 2021 (2020/5235/P), although this has yet to be implemented. A Minor Material Amendment application (2021/2120/P) for minor external changes was validated in June 2021, with a decision expected in August. However, the principle of amalgamation of the units and of having the master bedroom facing the garden at LG Floor has been consented. It is on this basis that this application is submitted.

The proposed air conditioning unit would only serve the master bedroom, at the rear of the property facing the garden. It would be located on the lower ground floor at the rear of the building, underneath the consented steps on the East side of the façade. This is shown in the enclosed rear elevation.

There are three key considerations for assessing the suitability of the air conditioning unit at this location: the impact on the Priory Road Conservation Area, the impact of the acoustic amenity of neighbours, and the application of the London Plan's Cooling Hierarchy.

**Impact on the conservation area**

The building is located in the Priory Road Conservation Area. Like the majority of the houses at this end of the street, number 24 is an unlisted building which is deemed as making a "positive contribution"<sup>1</sup> to the conservation area.

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<sup>1</sup> Priory Road Conservation Area appraisal and management strategy, 2000, p15

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*”.

The Priory Road conservation area is characterised by a “*cohesive architectural quality ... [that] stands as a distinct example and reminder of the Italianate fashion of the mid-19<sup>th</sup> century*”<sup>2</sup>. Its Appraisal and Management Strategy (2000) emphasises that, from a conservation perspective, the priorities for this site centre around maintaining the public-facing unity and exterior quality of the buildings, particularly with regards to the original details on the front of the houses.

The value of the building, in terms of its impact on the conservation area, can therefore be seen to lie in its front façade. In this respect, the installation of an air conditioning unit at the rear of no. 24 would not impact the conservation area, as it would not be seen from the public realm. However, and without prejudice to this position, it can also be demonstrated that the unit would not cause harm to the conservation area if it were considered by Officers to be relevant to assess the visual effects as seen from the rear (from private properties).

The proposed location for the air conditioning unit is underneath the consented staircase on the East side of the rear façade. As noted, this will not be visible from the public realm. It will also be screened from view of the neighbouring properties by the stairs. The unit will also be screened by an acoustic enclosure which will provide further aesthetic mitigation. In this regard, the proposed unit has at worst a negligible impact on the conservation area.

## Noise

The installation of any form of plant or machinery requires that noise levels do not negatively impact the amenity of neighbouring properties. A noise assessment for the air conditioning unit has been undertaken and is enclosed with this application. It finds that the proposed unit, with appropriate noise mitigation via the acoustic enclosure, will sit within the noise limits for plant and machinery set by Camden.

Further, the assessment notes:

*“Taking an overview of national and local policy it is clear that when considering the impact of noise, one must consider the significance of any impact. The presence of an adverse impact in itself is not sufficient to refuse permission.”*<sup>3</sup>

The air conditioning unit will have an impact on the neighbouring properties, in that it will increase localised noise levels. However, these levels are not *significant*, as they will sit within policy requirements, and the air conditioning unit at this location should be supported.

## Application of the cooling hierarchy

Policy CC2 of the Camden Local Plan notes that applications for an air conditioning unit must show the London Plan’s cooling hierarchy has been addressed. The cooling hierarchy<sup>4</sup> is as follows:

<sup>2</sup> Priory Road Conservation Area appraisal and management strategy, 2000

<sup>3</sup> Paragraph 2.6

<sup>4</sup> London Plan Policy 5.9

1. minimise internal heat generation through energy efficient design
2. reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls
3. manage the heat within the building through exposed internal thermal mass and high ceilings
4. passive ventilation
5. mechanical ventilation
6. active cooling systems (ensuring they are the lowest carbon options)

Given that no. 24 is a pre-existing building, points 1-3 do not apply in this instance.

With regards to point 4, the master bedroom on the LG Floor only has bifold doors as passive ventilation. It is not safe for these doors to be left open wide at night. Options for passive ventilation via the bifold doors with the first door section on a restrictor were considered, however, for passive ventilation to work successfully for cooling purposes, cross-ventilation needs to be achieved. This is not possible in this bedroom.

Dynamic Thermal Modelling has been undertaken to further assess the suitability of passive and mechanical ventilation in the bedroom (points 4 and 5 of the cooling hierarchy). The enclosed report shows that the bedroom fails to meet the criterion for both types of ventilation, and therefore other active cooling methods are necessary. An air conditioning unit is therefore appropriate and necessary in this location.

In conclusion, this application has evidenced that the installation of an air conditioning unit will not cause any negative impacts on the conservation area or the acoustic amenity of neighbours. Further, it will only be used for one room in the property, limiting the associated energy use and carbon emissions. The installation of the air conditioning unit is necessary given the lack of viable options from the rest of the cooling hierarchy. For these reasons, the application should be approved.

The application fee of £206 has been paid. We look forward to receiving notice of validation.

Yours sincerely,

**Annie Webb**

Planner

Centro Planning Consultancy