

For the attention of Helen Carney

PLANNING APPLICATION - PL/2025/08512

I write to object most strongly to the application made under this reference. It is a highly inappropriate use for these particular premises.

1. Ventilation and Odour Management. The Ventilation Management System document scores the application badly for potential odours. Page 12 of the document states that the ElectroStatic Precipitator 'will reduce odour emissions by up to 95%' (a somewhat conditional promise) in compliance with 'local authority guidelines'. Reference to HM Government's Asset Publishing Service suggests that this publication is out of date. Reference to the Institute of Air Quality Management's Guidance on the Assessment for Planning, confirms that some best practice was employed in the preparation of the assessment. However, the application fails to discuss plainly the recommended issue of receptors, in this case, High Sensitivity Receptors. These are defined as:

users who can reasonably expect enjoyment of a high level of amenity
people who would be expected to be to be present continuously, or at least for extended periods

Examples may include residential dwellings

and tourist/cultural

In this case, the subject premises sit beneath and in front of relatively densely constructed residential premises as well as between retail premises containing materials very sensitive to the capture and retention of odour.

Nowhere does the document discuss odour dispersion. Air flow is not, as we know, linear and the disturbance in the area of the exhaust has not been the subject of any dispersion modelling. The location and dimension of the exhaust is, in any case, a questionable presence in a conservation area.

2. Design and Access Statement. This is particularly uninformative. In paragraph 7 it outlines the waste management process proposed. This clearly would need much more discussion and understanding. Observation of other food outlets in the vicinity suggests that, potentially, at least one 1100 litre wheelie bin is likely to be appropriate, or a number of 170/240 litre bins if recovery for recycling is to be practised. The statement does not discuss what provision has been made for waste storage, other than to say that it will be stored internally. BUT, in examining the ground floor plans, there is no apparent provision made for this.

Given the nature of the retail premises either side and the subject premise's own narrow frontage, any placement of bin or bins on the pavement at any time prejudices the pedestrian experience, whether passers-by or potential customers of adjacent premises.

Space to the rear of the building is compromised by existing residential waste storage and other requirements for access to apartments above and beside the subject premises.

Waste Management officers from the council have previously attended other food premises in the town where waste storage has become offensive - St John's Street, adjacent to the old Barclays Bank premises and Snuff Street, where commercial and residential bins were both present. This application promises more of the same.

Meanwhile, there is no provision made either for the discouragement of random littering, inevitably present with the 'take-away' culture.

3. Fire Safety. Given the town's recent experience of a fire within a kebab shop on listed premises and the impact of that on adjacent premises, more re-assurance needs to be given in regard to fire safety precautions. In this context, consideration needs to be given to the security of the adjacent residential premises, the available escape routes in the event of a fire and, perhaps most importantly, fire suppression systems within the premises.

4. Opening Hours. The proposed closing time of 2.00 am seems highly inappropriate, given both the proximity to residential premises and the absence of other other significant late-closing activity.

5. Noise and Vibration. The buildings are elderly and construction does not conform to modern requirements for, in particular, insulation. no discussion is made in the document in regard to noise insulation or the nuisance from vibration.

I hope, therefore, that planning approval can be denied for this application given:

- i. the anti-social nature of the activity in regard to the adjacent receptors
- ii. the wholly inadequate discussion of/provision for waste management protocols appropriate to the operation
- iii. fire safety
- iv. inappropriate opening hours.
- v. potential statutory nuisances arising from odour, noise, vibration and littering