

Application No:	Consultees Name:	Received:	Comment:	Response:
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2023/3376/P	Zoe Scott	26/09/2023 15:27:42	OBJ	
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wish to raise strong objections to the installation of this air conditioning unit (without planning permission, and against Camden guidelines), and to request that the council rejects this retrospective planning application, and enforces its permanent removal.

The unit has been described in the retrospective application as an air source heat pump, no doubt in an effort to appear environmentally-friendly, yet the technical databook for this Daikon REMQ-U/REYQ-U model defines it as air conditioning:

http://www.daikintech.co.uk/Data/VRV-Outdoor/REYQ/2019/REYQ-U7Y1B/REYQ-U7Y1B_Databook_EEDEN19.pdf

There is no evidence that there is a clear need for this in the property, as no other nearby properties require air conditioning units, demonstrating that passive cooling can be effective in these buildings. The installation of air conditioning works against Camden's own sustainability targets where other, passive forms of cooling would be more appropriate.

In addition to the overt disregard of planning controls (the unit has been in use on multiple occasions despite the applicant having been asked not to use it while the retrospective planning application is in process, video available on request), we wish to raise the serious issue of noise and vibration.

The unit is extremely loud, and results in constant vibration while in operation which is audible from the interior of our property, two doors away. This noise/vibration can even be heard from our kitchen which is set back from the garden on the first floor, as well as from the three bedrooms on the second and third floors, all of which face the garden. Only one room in our property is street-facing, and therefore when the unit is in operation, there is little escape from the noise/vibration (indeed, this street-facing room is the hottest during the day), and none at night. This is having a significant impact on amenity, quality of life and wellbeing for our family, including our children who now live with constant noise/vibration, and are forced to sleep with their bedroom windows closed at night during hot weather. We believe an attempt to reduce the noise with a form of insulation has in fact resulted in even worse noise/vibration, as the unit has to work harder to function effectively. We therefore believe that this unit generates unacceptable noise and vibration impacts.

Guidance from the Institute of Acoustics regarding heat pumps (Institute of Acoustics Briefing Note – Heat Pumps (November 2022) [briefing_note_-_heat_pumps_-_publication_11.pdf](#) (ioa.org.uk) states the following:

'Heat pumps are part of the Government's strategy to reach net zero carbon emissions by 2050. However, the technology generates noise, and it can operate during the night and day. As a result, it has the potential to cause significant adverse effects to people living nearby.'

'The potential implications of noise and vibration should not be ignored.'

'Do locate the unit as far away as possible from neighbouring premises and especially away from openable windows to noise sensitive rooms such as living rooms or bedrooms.'

'Do place on facades that are already exposed to noise wherever possible (i.e., roadside).'

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'Don't locate in quieter locations, or near sensitive amenity spaces.'

'Installers should provide an MCS noise assessment. Having said that, it does not allow for tonality or include vibration, and is no guarantee of avoiding significant adverse noise impacts.'

'Any assessment approach should be informed by, and proportionate to, the local circumstances and the degree of risk of a significant adverse noise impact occurring.'

'Cumulative impacts that may result from multiple installations over time should be taken into account.'

The unit has been installed in the small (less than 20') garden of a terraced house in the immediate vicinity of numerous properties, and it is clear that the guidance above has not been considered at all.

We also note the following policies within Camden's Local Plan, under A4 Noise and Vibration:

6.99: Air conditioning will only be permitted where it is demonstrated that there is a clear need for it after other measures have been considered (Policy CC2 Adapting to climate change).

8.39: The Council will discourage the use of air conditioning and excessive mechanical plant. In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local micro-climate hotter.

8.42: Active cooling (air conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.

We also note the following sections of Camden Planning Guidance, Energy and Efficiency Adaptation, 2021:

10.6: Active cooling (such as air conditioning) is discouraged, unless the applicant can demonstrate exceptional circumstances where opportunities for cooling are unable to be controlled through passive measures alone.

10.8: The Council will discourage the use of air conditioning and excessive mechanical plant because of the additional energy consumption from operating the equipment, impacts on microclimate from the warm air expelled from the equipment, and because of the competition for plant space, which could otherwise be used for other renewables or green roofs.

We therefore urge the Council to enforce its own rules and ensure that retrospective planning permission is not granted, and that this equipment is permanently removed.

Yours sincerely,
Ms Zoe Scott & Dr Jasper Morrow