

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3376/P	Alan selwyn	13/10/2023 23:50:33	OBJ	<p>1. firstly, this is retrospective permission for something which should have been applied for prospectively. Presumably the applicant believed their application would be rejected and chose to risk an unpermitted installation.</p> <p>2. it is erroneously described as a 'heat source pump'. This is only loosely in the same way as describing a fridge, which, in fact this unit is, functionally. It is, in fact, an AIR-CONDITIONING UNIT, producing pumped air to the property, in operation throughout the summer months when neighbours wish to use their gardens, when it creates continual noise nuisance (Daikin REMQ-U/REYQ-U model manual defines it as 'air conditioning'): it has a fan as well as a motor. A genuine 'heat pump', normally provides underfloor heating, required in the cooler months.</p> <p>3. it already produces an intolerable noise nuisance, destroying the amenity and quiet enjoyment of several residents, most notably those of the 30 Howitt Road (a disabled person largely restricted to her home), 32 Howitt Road (making their garden unpleasant throughout the summer) and 28 and 27 Glenmore Road which abuts the property within inches of the unit. Residents as far away as 21 Glenmore road have a noise nuisance from WITHIN their property.</p> <p>4. It is interesting to note that the applicant chose to site the unit as far away from their own premises as possible, no doubt aware of the noise.</p> <p>5. This noise nuisance has already resulted in considerable distress to several residents and required attempts to reduce it involving local councillors. The applicant owner has been obstructive and belligerent in any kind requests and petitions. This is an ongoing problem for neighbours which is affecting the mental health of several and unless removed, can only exacerbate their ill-health.</p> <p>6. The installation contravenes the national guidance on such plants: 2.11. Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed. It states that planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts.</p> <p>7. The applicant's own sound assessment is incorrect in stating that the main noise perception would be from a first floor level. Though this is indeed a nuisance (preventing the opening of windows from neighbouring properties in the warmer months of the operation of this plant) It does not take into account quiet enjoyment of neighbouring gardens where continual low level noise and vibration is particularly disturbing. Traffic noise is minimal at this level in this street (these are generally quiet gardens, this is not 'a typical suburban' area) and so the qualitative comparison and resultant assessment is incorrect. Though garden noise was 'considered' it was not measured or properly assessed.</p> <p>8. The unit is right against the rear garden fence meaning there is no exit for the noise except directly into this wooden fence which then acts as a resonating board. There was no attempt to measure this sound during the assessment.</p> <p>9. It does not comply with permitted development rights and cannot be assessed under these rules.</p> <p>10. Air conditioning unit such as this are not in any way environmentally appropriate and require large amounts of energy to power them, resulting in a negative effect on Camden's policies to reduce energy consumption and reliance on fossil fuels. From Camden's own guidance: 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</p>

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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.

11. no other properties in the vicinity of this conservation area require such units or have been granted. It is clearly ridiculous in the application to describe the need for active cooling during the warmer periods ("A range of passive measures have been investigated however, these are unlikely to provide significant benefits beyond the existing situation which already includes modern windows and shading at ground floor level, for example"). All other neighbouring properties in these well-shaded buildings cope perfectly well without active pumped air-conditioning. No other planning applications have invoked the need for this.

12. The sited installation is in clear contravention of existing national and local guidance on such systems
13. This product contains fluorinated greenhouse gases. Refrigerant type: R410A (from the Daikin owner manual)

14. In relation to possible electrical interference: From the owner's manual: "NOTICE The equipment described in this manual may cause electronic noise generated from radio-frequency energy. The equipment complies to specifications that are designed to provide reasonable protection against such interference. However, there is no guarantee that interference will not occur in a particular installation." It is therefore recommended to install the equipment and electric wires keeping proper distances away from stereo equipment, personal computers, etc. A radius of 3m is proposed which places it well within the neighbouring garden.
