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| Application No: | Consultees Name: | Received: | Comment: | Response: |
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| 2024/2613/P | Felix Moldenhauer | 19/08/2024 06:03:43 | OBJ | |
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Dear Ms Bowden,

I object to planning application 2024/2613/P proposing the “Construction of a new acoustic housing and installation of an air conditioning condensing unit” at 57 Hillfield Road, London NW6 1QD.

It has to be noted that the applicant already illegally installed 3 AC units at his property.

The grounds for my objection are the following:

1. Amenity: Noise pollution

The submitted acoustic report appears to be severely flawed:

In the report, the “nearest noise sensitive receptor” is chosen to be a first floor window at 59 Hillfield Road that is more than 8m away from the proposed location for the installation of the AC condensing unit (see section 5.4.1 in the report).

In reality, my living room, kitchen, and bathroom windows at 55 Hillfield Road are less than 2m away from the proposed location; see below plan. The report claims that “The windows belonging to 55 Hillfield Road will be completely screened from the plant installation.” (5.4.2), but gives no details to confirm how such ‘complete screening’ will be achieved (if even technically possible). In the absence of those details, the application can only be assessed on the basis of the unattenuated noise impacts to the nearest receptor at 55 Hillfield Road, which are less than 2m away from the proposed plant location.

Using the true nearest receptor (ie the nearest windows of 55 Hillfield Road), the noise resulting from the proposed installation will substantially exceed the noise limit as per Appendix 3 of the Camden Local Plan (determined in the report as 23 dB).

It is worth noting that the report conveniently selected “the nearest receptor” at a distance of 8m at number 59 Hillfield Road – which just allowed to achieve a noise level of 22 dB (ie 1 dB below the noise limit of 23 dB) IF industrial noise control products were to be used.

2. Use of AC discouraged by Camden due to impact on local air quality and on global warming (with strict requirements for exceptions)

The London Plan states “Passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution. The increased use of air conditioning systems is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect.

Because the application is for active cooling, as per policy CC2 and the Council’s Energy Efficiency and Adaption CPG, the applicant has to demonstrate that other energy efficiency measures have been considered and modelled before resorting to active cooling. In accordance with Policy CC2 of the Local Plan, the Council discourages active cooling. Using active cooling systems increases energy consumption and carbon emissions contrary to the aims and objectives of policy CC1. As a result, air-conditioning units are only permitted where thermal modelling demonstrates that there is a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy. In addition, passive measures should be considered first. If active cooling is unavoidable, applicants need to identify the cooling requirement and provide details of the efficiency of the system.

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a. No Demonstration of Need

The use of Air-Conditioning is not necessary in houses. This application fails to comply with Policy CC2 of the Camden Local Plan as it has not produced a sound dynamic thermal modelling that demonstrates there is a clear that there is a clear need for the proposed units after all the preferred measures are incorporated in line with the cooling hierarchy (see point b below). - No overheating analysis has been provided.

b. Failure to Consider Alternative Solutions

The applicant has not provided any evidence to demonstrate that all preferred measures within the cooling hierarchy have been considered first (as required by CPG Energy Efficiency and adaptation) and implemented during the extensive remodelling works that the applicant has been performing at his property over the past 10 months.

The applicant did not prove that the proposed works are necessary and that appropriate climate adaptation measures to reduce the impact of urban and dwelling overheating could not be achieved by other preferred measures as set out in the cooling hierarchy. The proposal is therefore contrary to policy CC1 (Climate change mitigation) and policy CC2 (Climate change adaptation measures) of the Camden Local Plan 2017 and advice in the Energy Efficiency and Adaption CPG.

Due to the above reasons, this application should be rejected.

Kind regards
