

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/2172/P	Richard Simpson for Primrose Hill CAAC	07/07/2019 11:07:58	OBJ	ADVICE from Primrose Hill Conservation Area Advisory Committee 12A Manley Street, London NW1 8LT

19 June 2019  
10 St George's Terrace NW1 8XH      2019/2172/P + 2019/2550/L

Strong objection.

We object strongly to the installation of air-conditioning in houses and flats where natural ventilation, including cross-ventilation, is possible. We note that Camden's Local Plan, Policy CC2 'Adapting to climate change', requires 'all development' (and not only those proposing 5 residential units or more) to adopt appropriate climate change adaptation measures, spelling out, in para. 8.39 'The Council will discourage the use of air conditioning and excessive mechanical plant.' At para. 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 fully endorse Camden's policy CC2 and ask for it to be upheld. Conservation of our environment in its most basic sense is at risk from climate change: every one of us has a role to play in addressing climate change.

We understand that the Council has now agreed that we are in a climate crisis: it is critically important that this is seen to be carried through in appropriate policy and implemented through effective development management.

In this case, we note that the installation is described both as a heat pump and as an air conditioning unit. A heat pump may be environmentally beneficial where it extracts heat from the ground or air to warm a building instead of, or as supplementary to, other warming. In this case, it is using energy to throw the internal heat away: this is not beneficial to the environment, but harmful.

We note that the Local Plan requires all preferred measures to be undertaken before active cooling is permitted. In this case this should include the testing of the effects of internal insulation and means of enhancing the natural air-flows which exist in this dual aspect flat.

Richard Simpson FSA  
Chair

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