

31 Great James Street London WC1N 3HB

Alyce Jeffery

Camden Planning Office

29 June 2020

Dear Ms Jeffery

Planning Application - 2019/6233/P and 2020/0363/L

I object to the air conditioning unit aspect of this application. Please note I placed an earlier comment as an 'interested party' but I wish to cancel that and have it replaced by this objection.

Whilst I can see that the applicants have given the application a lot of careful thought and wish to incorporate the air conditioning as sympathetically as possible, I object to it. Fundamentally, you cannot put a square peg into a round hole. Air-conditioning is wholly inappropriate for these listed buildings in a conservation area. It will damage listed panelling, cause interference with residential amenity and set a dangerous precedent as well as being environmentally undesirable. Whilst the application is thorough, it does not give any heed to the specific context and environment of the property which will make air conditioning highly undesirable both for the listed property and its neighbours. I set out below in more detail grounds for objection.

Residential amenity. The units will interfere with my residential amenity. Whilst I appreciate that a noise report has been done and consideration has been given to this it does not take account the specific circumstances and direct environment. I am in the neighbouring property and have two bedrooms on the top floor, one on the second and one on the first floor. The backs of the properties on that side of the street back on to a high wall. Sound bounces around the corridor considerably such that conversations two or three properties away can be heard with clarity. If there is an air conditioning unit on the roof the noise from it will echo down the street. I previously lived in a similar street in Soho and we had enormous problems with ACUs at the back of us, so I am well aware of the noise problems they can cause.

If permission were granted for the air conditioning units, it would likely be running most vigorously on hot days, the very days when I would want all my windows open to allow a good though draught, especially on the upper floors at night. Thus they would cause maximum interference with residential amenity at a time of most need for peace.

Damage to a listed building. Whilst I can see that thought has been given to minimising impact of ducting on panelling there appears to be no understanding or reference anywhere in the heritage statement of the affect of temperature change on wood. I have lived in listed buildings built in 1720s in London since 1996, previously in Meard Street and now in Great James Street. I am well acquainted with how the panels adapt, swelling and shrinking over the year depending in temperature. Air conditioning will clearly result in bigger temperature variations and risk

damaging the panelling drying out the wood considerably. The applicants may not be aware, but part of their hallway is very close to ours with no wall between, just panelling back to back, so their temperature changes will affect our panelling on that wall too.

As decision makers, you must 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' Allowing air conditioning will not be having this regard, either for the building in question or for its immediate neighbours which are also listed.

As stated in the applicant's heritage statement there is a "strong presumption" against granting planning permission for development which would cause harm to heritage assets. The panelling is specifically noted in the listing. Granting permission for the air conditioning will be risking damage to heritage assets.

In breach of Camden Design Policy and the National Planning Policy Framework Camden Policy D1 demands that design: a. respects local context and character; b. preserves or enhances the historic environment and heritage assets; c. Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; and that planners j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building. The National Policy Framework requires great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." And that change 'should require clear and convincing justification'. I find it very hard to find a clear justification for the damage air conditioning would cause to the panelling when

No other residential properties in the street have it

The property has shutters and windows that open providing adequate shade and ventilation

In Breach of Camden Local Plan. Section 6.99 of the Camden council Local Plan [4] states that "Air conditioning will only be permitted where it is demonstrated that there is a clear need for it after other measures have been considered", and section 8.39 states "The Council will discourage the use of air conditioning". As no other residential property in the street has air conditioning and the property has shutters and opening windows providing shade and ventilation there cannot be said to be a 'clear need'. I live in an almost identical property and have never felt the need for air conditioning. The street is quiet and has little traffic so it is no problem opening up windows in front and back to allow a decent through draught and on the occasional very hot day, I keep the shutters closed, windows open.

Environmental Impact Air conditioning uses unnecessary electricity and pumps hot air into the street. If every house in the street had it the street would be hotter. If you allow one listed building to have it, there is no reason why all the rest would not eventually follow suit damaging the panelling all down the street and increasing Camden's carbon footprint at a time when global warming is the biggest threat to the world.

I urge you to deny the air conditioning element of this application and suggest alternative measures such as use of shutters and opening windows.

Yours sincerely

Katherine William-Polwett