**Objection to Planning Application 2020/2890/P 11 Holly Walk NW3**

**From:**

**The Heath & Hampstead Society**

**Summary:**

This application is in breach of planning policies in: the London Plan, Camden Local Plan and the Hampstead Neighbourhood Plan.

1. **Air Quality and Global Warming**
2. **The Application includes no Demonstration of Need and Fails to Consider Alternative Solutions**
3. **Noise Pollution, Flawed Analysis and Significant Loss of Amenity**

Expanded further, as follows.

1. **Air Quality and Global Warming**

Camden Council’s Local Plan, Policy CC2 (paragraph 8.39) is explicit –

*“The Council will discourage the use of air conditioning and excessive mechanical plants”.*

The proposed large air conditioning unit would negatively impact air quality and contribute to global warming. It would also consume a significant amount of energy (kilowatt hours) and so further contribute to global warming.

The [Emerging London Plan](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf) states in paragraph 9.4.4: “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.

If active cooling systems, such as air conditioning systems, are unavoidable (which will be very rare in residential buildings), these should be designed to reuse the waste heat they produce.”

1. Furthermore, this application does not comply with Chapter 10.8 of Camden Guidance on Energy Efficiency
2. **The Application includes no Demonstration of Need & No Consideration of Alternative Solutions**

Contrary to paragraph 6.99 of the Camden Plan, this application does not demonstrate that “there is a clear need” for an air conditioning unit nor explain why it should prevail over other alternatives. This application does not comply with Chapters 8.42 and 8.43 of the Camden Local Plan since the applicant has not incorporated “best practice resource management and climate change mitigation and adaption”.

The applicant has failed to comment on the viability of other more environmentally desirable alternatives, such as passive ventilation shafts, ground source heat pumps, green roof or even open windows. This application must be refused as contrary to paragraph 6.99 of the Camden Local Plan, the applicant has not demonstrated that “there is a clear need” for air conditioning nor why it should prevail over alternatives”.

This application also fails to comply with paragraphs 8.42 and 8.43 of the Camden Local Plan as it has not produced a dynamic thermal modelling that demonstrates there is a clear need for it after all the preferred measures are incorporated in line with the cooling hierarchy.

The applicant has not complied with Chapter 5 of the Emerging London Plan ( policies S1 .A & S1.4 – paragraphs 94.3, 94.4 etc.) by incorporating the cooling hierarchy into the design process to adapt to the changing climate change since: “Air conditioning systems are a very resource intensive form of active cooling measures, increasing carbon dioxide emission and also emitting large amounts of heat into the surrounding area”.

There are non-intrusive means of achieving ventilation, such as, for example, passive ventilation shafts utilising natural differential pressure or ground source heat pumps. The applicant has failed to demonstrate that these options have been duly investigated. There are many alternative means to ventilate this house e.g. stack, stock, cross, purge, roof, trickle ventilators, or even opening windows, and the applicant has not demonstrated that these have been considered.

The applicant has also failed to demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation – this is contrary to Camden Policy CC2, paragraph 8.39 and 8.43.

**Conclusion:**

**This application contravenes the planning and environmental policies of the London Plan, Camden`s Local Plan and Hampstead Neighbourhood Forum and should be refused.**