

**STRATAGEM
PLANNING
CONSULTANTS_**

Climate Change Statement_

14 Regents Park Road, NW1 7TX

September 2020

1. Introduction

1.1. This Statement is submitted in support of an Application (2020/2146/P) for changes to the above Property, which include the replacement of an existing air conditioning system.

1.2. The development description as amended by LB Camden reads:-

“Alterations to dwellinghouse to involve: alterations to external pipework, new door and window at basement level to the front, four new rooflights, new sash windows and doors to rear elevation, two external condensing units at first floor level, extension of outrigger at basement level, removal of metal staircase and construction of rear wall.”

1.3. LB Camden have requested a statement in respect of this application to justify the replacement of the air conditioning units with reference to the guidance in **Policy CC2 Adapting to Climate Change** of the LB Camden Local Plan 2017.

2. Policy Context

2.1. **Camden Local Plan 2017 Policy CC2 - Adapting to climate change** says:-

“The Council will require development to be resilient to climate change....

“All development should adopt appropriate climate change adaptation measures such as:

.... measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.. ”

2.2. The ‘Cooling Hierarchy’ referred to is contained in the London Plan and discussed further below.

2.3. **Policy 5.9 Overheating and Cooling - London Plan** says:-

“5.47 London will experience higher average temperatures. This is likely to intensify the urban heat island effect – the way higher

ambient temperatures are experienced after sunset in urban areas in comparison with rural areas. This is most intense at night and in London is principally experienced within the Central Activities Zone, as buildings and roads absorb more solar radiation than green space and vegetation. Combined with man-made heat emissions, this can make the centre of London up to eight degrees warmer than the Green Belt on hot summer nights.

- 2.4. The Property is adjacent to the Central Activities Zone. It is therefore affected by the higher than average temperatures identified by the London Plan and requires mitigation measures.
- 2.5. The decision to replace the air conditioning unit as a mitigation measure is consistent with **Policy B of 5.9 Overheating and Cooling** and the London Plan's 'cooling hierarchy'.

3. The Cooling Hierarchy

The tiers within the Cooling Hierarchy are considered below against this proposal.

1. Minimise internal heat generation through energy efficient design

The application is a refurbishment which is mostly internal and cosmetic. The applicant is taking the opportunity to update the air conditioning system and to reduce the number of external units, which will also now emit less noise. This is not a new development and there are no opportunities to minimise internal heat generation through the work proposed.

2. Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls

As above. This is not a new development.

3. Manage the heat within the building through exposed internal thermal mass and high ceilings.

It is not possible to adjust the ceiling heights or expose internal thermal mass without causing significant harm to the Property which is within the Primrose Hill Conservation Area.

4. Passive ventilation

As above. It is not possible to introduce this within the existing building. Using passive ventilation simply by opening windows would not be sufficient and would materially affect the quality of life of occupants due to the proximity to busy roads. The **Camden Local Plan (Adopted 2017) Policy A1** supports the protection of quality of life:-

“The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will seek to ensure that the amenity of communities, occupiers and neighbours is protected”

5. Mechanical ventilation

The proposed works offer no opportunity to integrate mechanical ventilation. This would not be possible without causing significant harm to the existing property. The location within the Primrose Hill Conservation Area would prohibit the installation of mechanical ventilation.

6. Active cooling systems (ensuring they are the lowest carbon options).

This is the only viable mitigation measure. This is more so because the system replaces an older system which uses more external units. The introduction of the new system will mean that the older units will be removed and the position will be improved from the status quo.

4. Comparable Decisions

The installation of air conditioning units has been permitted in nearby, similar properties demonstrating a recognition by LB Camden of the need to provide active cooling in this location.

Most recently, permission was granted (2019/0556/P) at 18 Regents Park Road which is a near identical property to this one, just three doors away. This property did not have existing units that were to be removed and updated.

5. Conclusion

- 5.1. The Applicants have considered the Cooling Hierarchy in this statement and it is concluded that the only viable mitigation measure is through active cooling.
- 5.2. In this case there will even be a net benefit in that granting of permission will facilitate the removal of the older system and a reduction in the number of air condenser units due to improved efficiency.