

Objection to Planning Application 2020/2666/P

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](#) 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.”

Furthermore, this application does not comply with Chapter 10.8 of Camden Guidance on Energy Efficiency –

“because of the additional energy consumption and its effect on the microclimate from the warm air expelled from the equipment”.

Daikin, the manufacturer of the air conditioning unit, has stated that the heat generation from the proposed unit would increase the air temperature by - at the very least - 15% over the ambient air condition as a result of the hot air exhaust on one side of the unit. The manufacturer also states that me that the whole system will necessitate - at the very least - 10,000 kilowatt hour energy use - hence further contributing to global warning.

It is also of note that the applicant has enclosed a plant technical specification that is generic and does not state which specific model is proposed.

- 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 adaptation”.

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.

Most of the windows of the existing house are north or east facing, hence minimizing sunshine exposure and solar gain.

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.

3) Noise Pollution, Flawed Analysis and Significant Loss of Amenity

The Environmental Noise Survey was conducted at a time when noisy basement works were being conducted at 8 Pilgrim’s Lane and furthermore, there was a water pump constantly in use all during the night and at close distance to the noise monitoring location. This will have produced abnormally high levels of noise measurements. The inner garden of the property is very quiet and during the night noise does not exceed 30 db. The recording on Appendix B shows the result of the survey in the 35 to 40 db range is therefore incorrect and was the result of the water pump that was activated at the time throughout the night during the excavation phase in January 2019. The noise monitoring location, shown in Plan 117 of the application, is incorrectly located - the equipment should have been placed in the middle of the garden and at a time when there was no construction activity at 8 Pilgrim’s Lane.

It is also noteworthy that the Noise Report states, in paragraph 3.3, that noise control measures will be required in any instances in order to meet the project design noise criteria. There no assurances

that what is proposed will be adequate on that matter. Furthermore, the noise will be intensified around the input and output outlets and it has not been demonstrated how this will be adequately controlled either.

No mention is made in the application of the noise impact on the many close windows and gardens which are directly exposed to the proposed unit. Policy A4, paragraph 6.87 is not complied with as the proposed air conditioning unit will have a harmful impact – it will increase stress levels and cause a significance disturbance to the lives of all nearby residents. Some of the owners and occupiers of the neighbouring houses are elderly or ill. Some also work from home. The noise generated by the proposed equipment would significantly compromise the rights of many neighbours to enjoy their gardens without nuisance.

There will not be any mechanisms for the neighbours in the surrounding properties to be informed in real time of the noise measurements either. Furthermore, there is no insurance or legally binding undertaking that the applicant will maintain strict and regular control and monitoring on the effectiveness of the equipment. Over time, the effectiveness of the equipment will deteriorate and there is no legally binding undertakings to have regular monitoring of the equipment.

Due to the on-going Covid-19 crisis, it is more important than ever to protect the amenities of multi-generational families.

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.