

29th January 2021

Camden Council
 Planning Department
 2nd Floor, 5 Pancras Square
 c/o Town Hall, Judd Street
 London
 WC1H 9JE

Dear Sir / Madam:

RE: REMOVAL OF INNER WINGS OF MAIN BUTTERFLY ROOF TO FORM RECESSED FLAT ROOF TO HOUSE EXTERNAL A/C CONDENSER, ENCLOSURE OF THE AREA UNDER THE FRONT STEPS AND THE EXISTING REAR WINTER GARDEN TO BE RE-BUILT.

24 REGENT'S PARK ROAD NW1 7TX

CLIMATE CHANGE STATEMENT

We wish to submit this statement in support of the planning application to the above Property, which will include the installation of an air conditioning system.

As a 19th century home, the property was designed with natural ventilation in mind; high ceilings to the ground and first floors mitigate some thermal gain but due to the change in environment and modes of living since the house was designed, this feature is inadequate to address the cooling needs of the house. The proposal seeks to install air conditioning to the habitable rooms worst affected by the dwelling overheating.

Proximity to busy roads and the internal layout mitigate the use of natural and cross ventilation in the property. Noise pollution makes it impossible to rely solely on cross ventilation and open windows, which would render bedrooms and reception rooms unusable. In addition, air pollution from the same roads compound the negative impact on the house and its occupants. If windows are left open in an attempt at natural ventilation, air pollution would be evident on the building fabric, finishes and furnishings of the house, impacting the health and quality of life of the occupants. The Camden Local Plan (Adopted 2017) states in Policy A1:

"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".

Ventilation and thermal comfort are a requirement for quality of life and as sole use of cross ventilation damages the health of the occupants, the installation of air conditioning units will serve this purpose without damaging amenity.

Camden Council's supporting information for planning applications states that *"A sustainability statement should be sent with applications for:*

- *All new build residential houses and flats*
- *Multi-occupation residential buildings with 10 or more rooms/units or occupiers*
- *Residential refurbishments, conversions and change of user for:*
 - *5 or more dwellings, or*
 - *500sqm or more of floorspace*
- *Non-residential development of 500sqm or more of floor space (including offices, retail and industrial)"*

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Although this application relates to an existing single-family residential dwelling of less than 500sqm of floor space and is therefore outside of the scope of applications requiring a sustainability statement, we are aware of previous objections to similar proposals in the near vicinity and offer this statement as a pre-emptive reply.

Camden Local Plan 2017 Policy CC2 Adapting to climate change

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

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

- a. the protection of existing green spaces and promoting new appropriate green infrastructure;*
- b. not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;*
- c. incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
- d. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.*

Any development involving 5 or more residential units or 500 sqm or more of any additional floorspace is required to demonstrate the above in a Sustainability Statement.

Sustainable design and construction measures

The Council will promote and measure sustainable design and construction by:

- e. ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;*
- f. encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;*
- g. encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and*
- h. expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.*

The policy requirements ‘a-c’ and ‘e-h’ are not relevant to this application, but we will address requirement ‘d’ further within in this document.

Policy 5.9 Overheating and Cooling of the London Plan states:

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.

24 Regent's Park Road borders the Central Activities Zone and suffers the higher-than-average temperatures referenced above. The introduction of additional ventilation is necessary to mitigate the dwelling overheating experienced at the residence.

LONDON PLAN 'COOLING HIERARCHY'

The decision to install an air conditioning system as a mitigation measure is consistent with Policy B of 5.9 Overheating and Cooling and the London Plan's 'cooling hierarchy'.

Policy B of 5.9 Overheating and Cooling of the London Plan applies to this scheme as follows:

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 install an air conditioning system. As this is not a new development, 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

- This is not a new development and therefore offers no opportunity to integrate the suggested measures.

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 suitable solution for this proposal

RELEVANT PLANNING APPROVALS

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, a brief sample list of relevant applications follows:

- 2020/2146/P - 14 Regent's Park Road - installation of two external condensing units to the roof

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- 2019/0556/P - 18 Regent's Park Road - Installation of air conditioning condensing unit on roof terrace of the existing single family dwellinghouse.
- 2018/3871/P - 42 Gloucester Avenue - Installation of 1no. air conditioning unit at roof level
- 2015/0680/P - 58 Regent's Park Road - Installation of air conditioning plants and acoustic enclosures to the rear of the property
- 2014/6391/P - 23 Prince Albert Road London NW1 7ST - Installation of an air conditioning unit at ground floor level

CONCLUSION

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 and it has been demonstrated within this statement, that the application property requires additional ventilation and through the use of the London Plan cooling hierarchy, the suitable solution is to install energy efficient air conditioning condensing units as proposed.