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2021/1293/P	Tsambika Cordara	17/05/2021 17:31:45	OBJ	I have concerns for the planning application 2021/1293/P of an ASHP to be installed in the proposed location on the eastern side of 13A Pond street rear garden at the boundary party walls of 2 Connaught Mews, 17 Pond street, 33 Hampstead hill Gardens. My comments with regards to the impact of the location of this plant installation on my external amenities are as follows: KP acoustics sound report prepared for this application shows inconsistencies and is incomplete in certain key regards. 1. KP has based it's representative ambient sound level measurements on a different proposed location of that of the ASPH to that of the architects drawing: see drawing 01 proposed ground floor plan 201 205 PO8. Therefore, I have significant concerns about representativeness of the measurements when applied to all assessment locations. Indeed, this ought to undermine the reliability of the report in its entirety, given the criticality of the location of the machinery to the analysis. 2. KP's readings and measurements are not sufficiently representative of all the amenity areas that will be impacted by the proposal, given that they are away from the key zone, from my viewpoint (see next). KP acoustics choice of positioning of sound receivers from the closest amenities is incomplete in calculating a representative ambient sound level. The closest amenities most likely affected by the proposed plant position are precisely the garden boundaries of numbers, 2 Connaught Mews, 17 Pond street and 31 Hampstead hill gardens as ASHP is proposed on the boundary of where these properties meet. These are well away from busy Pond street. Oddly, no receiver position was place at this boundary. Why? Only one receiver position was placed in the shared gardens of 29-33 Hampstead Hill Gardens which is furthest amenity on 13a Pond streets rear west side facing Hampstead Hill gardens and the opposite side of the ASHP. In contrast, KP have placed two further receiver positions for noise readings in busy Pond street opposite the Royal Free Hospital and the popular Pub The Roebuck which would raise the ambient sound level disproportionately. Both positions are furthest and opposite side of the proposed plant. Therefore 44 DB and 41DB seem very high ambient sound calculations and not indicative of the area where the proposed plant will be. It is not a representative measure because the actual closest amenity measurements have not been considered or taken into account. It is reasonable to expect more than one noise receiver measurements from rear of 13a Pond street rear garden where the ASHP position is being proposed at the boundary - that of the gardens of 2 Connaught mews, 17 Pond street, and 31 Hampstead Hill Gardens whom will be most impacted for a more representative ambient sound measure. 3. A further concern in terms of viability: no engineering plans are included to support engineering issues associated with installing a mechanical plant such as an ASHP on the boundary of my property as well as the other neighbouring properties party wall especially where the ground level in my property drops down to by over 2 metres in my garden at 2 Connaught Mews (in other words, the noise source is elevated to overlook my land, with the resultant increase in its impact.)

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4. It does not appear that the applicant can demonstrate that they have carefully considered all the locations for the ASHP. On page 13, the last paragraphs KP acoustic report, it is concluded that “noise emission from the proposed plant unit would not have an adverse impact provided that the noise control strategy presented in 6.1 is followed”. On page 12, 6.1 under the heading Plant Unit Installation KP Acoustics report recommend that a rooftop plant enclosure is installed which should provide the minimum insertion loss levels shown in table 6.1. Therefore KP are making a different plant location recommendation to that of the planning application (and their sound report submitted). This is their recommendation which they see as viable since they make clear reference to it.

I suggest that the above be carefully considered and together I would encourage Camden planning to ask that the design team of the Spencer Baylin re-visit other location options for the ASHP based on the recommendation and guidelines of Greenage website.
https://www.thegreenage.co.uk/where-to-put-your-air-source-heat-pump/. The Greenage guidelines state the following:

“PUT YOUR ASHP next to the house”
“It reduces the length of pipwork between the unit and the house. As well as looking better and reducing trip hazards, this keeps efficiency at the maximum as it minimises heat loss through the pipes.”

5. In short, the sensible recommendation is that the ASHP is better placed nearest the building that it is servicing as this is most efficient use of energy. Looking at the plans submitted by Mr Baylins design team, the ground floor sitting room wall parallel to Pond street which has no glazing (and is away from all the affected gardens, and on the nosiest side of 13A) and might provide a viable option to carefully consider.

Greenage clearly state the ASHP is not to be installed near the boundary of neighbouring prosperities. The distance limit for the proposed plant on the architectural plans submitted is less than 1 m contrary to Greenage guidelines. Greenage state that there is at least a minimum of 1 m from a boundary wall. Yet, this is what is proposed. It makes little sense.

6. It seems that the external measurements for this unit including the enclosure exceed the maximum size permitted for an ASHP in a domestic property. Greenage guidelines for the size of the unit to do 0.6 cubic metres, however it is not clear if this applies to the unit with the enclosure or without. The unit being proposed with the enclosure is 2.42 cubic metres which was arrived at using the external measurements on the planning application 1700mm wide x 1100mm x 1295mm.
http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8828486/file/document?inline This needs to be considered more closely by the design team.

7. I am currently on friendly terms with Spencer Baylin who communicated a genuine desire to find the least impactful location for the ASHP when I expressed genuine concern at the proposed plant location at the boundary of my garden. My garden is a space I use a lot. Without proper and careful consideration suitable and viable locations of the ASHP together with accurate and representative measurements for a noise report my otherwise peaceful garden/outdoor amenities away from the noise of Pond street and that of my neighbours will be adversely affected.

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8. Please see page 13 of the Sustainablity and Energy statement by Integration http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8908088/file/document?inline

Finally I make this point not to discourage the use of an ASHP as I believe it is generally a sustainable option of green energy if it is viable in the location and it meets the objectives of Camden to reduce carbon emissions. However I am concerned why the applicants design team are pursuing the ASHP option when the sustainability and energy statement by Integration states very clearly on page 13 the following:

"It is envisaged that the potential for carbon reduction will be equal or inferior to that of an efficient gas fired condensing boiler in this instance.
In addition to the limited renewable energy generation, the air source heat pump will need to be located externally, this will have an impact on the limited external amenity space and visual, and noise issues will need to be addressed.
Considering the above an air source heat pump installation is not considered appropriate or the best soulution for this property".

9. 13a Pond street Passive building measures shows a 20% improvement which is more than the 2013 building regulations which requires 19% improvement and this is with a gas condensing boiler which states is 92% efficient along with all the other passive building systems designed into the house. See page 14 of the sustainability report.
It is known that there is a gas pipe to the property but it is not in use whilst the building works are in progress.

10. My comments above should be read with the contents of a review that will be forthcoming from a very experienced and respected, Paragon Acoustics expert. Taken together, these will demonstrate that this application merits fundamental rethinking in order to embrace a proper solution.

I sent an email on the 8th May inviting the Planning Person, Sofie Fieldsend who is dealing with this application to meet and look at the location of the ASHP from my property as it will make more sense to be on site. I hope to have a reply to this request soon.