



20 August 2020

Mark Chan
Planning Solutions Team
London Borough of Camden

Re: Planning Application 2020/2371/P, 8 Downshire Hill

Dear Mark,

The Hampstead Neighbourhood Forum objects to this application as it is contrary to planning policies of the NPPF, London, Camden Local Plans. In pre-planning advice, the applicant was advised that the introduction of air conditioning into a residential property would not be supported in principal and that the property did not need air conditioning to function. The application fails to address either of these points though it does include a heritage report to discuss Camden's third point regarding damage to the original fabric of the listed building (re: 1.8 of the heritage report).

Air Quality and Global Warming

Camden Council's Policy CC2 which states: "The Council will discourage the use of air conditioning and air conditioning and excessive mechanical plants".

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.

Nor does the proposal comply with the [Camden's Environmental Sustainability Plan](#), as it fails to improve energy efficiency of homes or minimises energy use.

No Demonstration of Need

This application fails to comply with Chapter 8.42 of Policy CC2 of the Camden Local Plan as it has not produced a sound 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.

This application is also contrary to Chapters 8.42 and 8.43 and paragraph c of Policy D1 of the Camden Plan as the applicant has not incorporated "best practice resource management and climate change mitigation and adaption" and "does not promote health".

No overheating analysis is provided.

Failure to Consider Alternative Solutions

The proposal fails to properly incorporate the cooling hierarchy into the design process to adapt to the changing climate as required by paragraph 5.48 of the London Plan.

The applicant has also neglected to demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation, contrary to Camden Policy CC2 paragraph e.

We suggest that the applicant look toward non-intrusive alternative means to ventilate this house and recommend that Camden refuse this proposal.

Sincerely,

Oliver Froment
Hampstead Neighbourhood Forum