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Design, Access and Heritage Statement

Proposal: **Installation in the rear garden of 4 air-source heat pumps (ASHPs): 2 pumps for space heating, 1 pump for domestic hot water heating, 1 small pump for cooling electronic equipment, all within acoustic enclosures.**

Site: **58a Redington Road London NW3 7RS**

18/005

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1.0 Introduction

1. In May 2006 the government introduced changes to the planning system and particularly changes to the development control system. Guidance on Information Requirements and Validation is contained in the DCLG publication of the same name.
2. This is a Heritage and Planning Statement to explain the proposal and how it affects the heritage asset. This will draw information from planning policy both nationally and locally.

National Design Guidance

- 1.3 The Government published on 27th March 2012 advice in the form of National Planning Policy Framework (NPPF) which was produced to make the planning system less complex and more accessible, to protect the environment and promote sustainable growth. The NPPF provides some design comments;

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

4. With reference to decision making the NPPF comments;

Planning policies and decisions should aim to ensure that developments:

- **Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**

- **Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;**
- **Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and public space as part of developments) and support local facilities and transport networks;**
- **Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;**
- **Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and**
- **Are visually attractive as a result of a good architecture and appropriate landscaping.**

Local planning authorities should consider using design codes where they could help delivery high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relations to neighbouring buildings and the local area more generally.

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Although visual appearance and the architecture or individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

5. The approach to design is therefore to ensure quality and improvement. The Government have made a number of announcements in a number of attempts to try and further boost housing delivery.
6. Planning Practice Guidance now covers a broad range of planning topics and supersedes a large number of existing planning documents in an attempt to streamline Government planning advice. This document is a material consideration in terms of assessing planning applications.



Image 1: Site Location as shown on London Borough of Camden Policies Map adopted 2017

- 1.7 As shown in Image 1 above the application site falls within the Conservation Area. It is also just outside the Growth Area of Hampstead.

2.0 Planning History

- 2.1 2018/5112/P New residential Development Erection of 5 bed dwelling following demolition of existing Granted 14-10-2019.
- 2.2 The planning officer concluded in the planning report:

The existing building is not considered to be of any particular architectural or important merit to the local area. This is by reason of the building not being statutorily listed, nor it being described as a building that makes a positive contribution to the Redington Frogna Conservation Area. Furthermore, as explained in detail below, the proposed new dwelling house is considered to be a development that preserves and enhances the conservation area. As such, the demolition of the existing dwelling house in principle on design and conservation grounds is not objected to by the Council.

Overall, the design of the proposed development is considered acceptable. The scheme is considered to reflect on and respond to the existing form, scale, appearance and material palette that is observed along Redington Road. It is considered that the proposed demolition and rebuild of the new dwelling house would not cause harm to the character and appearance of this part of the Redington Frogna Conservation Area, in accordance with policies D1 and D2 of the Camden Local Plan.

- 2.3 This planning permission has had the conditions discharged and is now under construction.

23948- The erection of a 4 double and 2 single garages at 58/58A Redington Road, Hampstead. Refused 16/03/1962.

23543- The retention of the basement level and porch front extensions, the means of access to the highway and alterations to the front fenestration. Granted- 28/01/1977.

8601562- Erection of a single storey extension in rear garden to enlarge kitchen and provide breakfast room as shown on drawings No. 191/1 and 2. Granted 05/11/1986.

2596- The erection of a single storey extension to the kitchen at the rear of the garden floor of No. 58 Redington Road, NW3. Granted 07/09/1970.

3.0 Proposal and Assessment

3.1 The application comprises of the following documents: -

Proposed Documents

- Location Plan: 58aRR_S00,
- Site Plan Existing: 58aRR_S01A
- Site Plan Proposed (with Enclosures details): 58aRR_P01B
- Structural Proposal: SK.22 rev B, 23 rev B
- Sustainability, Energy and Overheating Report: 58aRR 28/2/2023
- Acoustic Impact Report: 58aRR_2020-07-10-Acoustic-Report-and-PNA-58A-Redington-Rd_2003043-6A
- Photos Sheet of the Acoustic Enclosure



Image 2: Overview of Site (outlined in red)

3.2 58a Redington Road is a semi-detached property of 4 storey plus attic and is and has the benefit of a large rear garden area, extending to the rear of garages of of Templewood Avenue. The property shares the party wall with 58 Redington Road and lies within Sub Area Four of the Redington Road and Templewood Avene of the Redington & Frogna Conservation Area. 58a Redington Road is not referenced in the Conservation Area Appraisal and

consequently the dwelling is not mentioned in either making a positive or negative contribution to the area. The dwelling has clearly been remodelled in a 1960's style and does have a very negative impact on the Conservation Area.



Location Plan

- 3.3 The proposal is for Installation in the rear garden of 4 air-source heat pumps (ASHPs): 2 pumps for space heating, 1 pump for domestic hot water heating, 1 small pump for cooling electronic equipment, all within acoustic enclosures.

- 3.4 The units are located to the rear of the property.

Proposed Layout Plan

- 3.5 The overall character of Redington Road is one of relative architectural consistency, it is of a varied asymmetrical forms of large detached houses with tile hung and applied timber elements, and predominaty hipped tiled roofs broken up by tall brick chimneys and gables.
- 3.6 The building form, in terms of set back, scale has a degree of consistency in this part of the road. Opposite the site the development form has more variety with dwellings, form, postion and spatial dispostion. The proposal will not be seen from the front of Redington Road.

4.0 Development Plan

- 4.1 The Development Plan comprises the London Plan 2021, the Camden Local Plan 2017. The relevant policies from the Camden Local Plan are listed below:

Policy A1 Managing the impact of development
Policy A4 Noise and vibration
Policy D1 Design
Policy D2 Heritage
Policy CC1 Climate change mitigation
Policy CC2 Adaptation to Climate Change

- 4.2 The following Camden Planning Guidance is also relevant;

CPG1 – Design (Jan 2021)
CPG6 – Amenity (2021)
CPG7 – Energy Efficiency and Adaptation (January 2021)

5.0 Assessment

- 5.1 The starting point for the application is the Development Plan and a number of policies are relevant. The National Planning Policy Framework is also a material consideration.
- 5.2 Local Guidance is contained in the Camden Local Plan. This is part of the development plan. Starting with Design and Heritage considerations. The assessment then looks at climate change mitigation and the noise considerations.

Design and Heritage

- 5.3 Policies of particular relevance to the development plan include Policy D1 which is a material consideration, it advises;

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;**
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;**
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;**
- d. is of sustainable and durable construction and adaptable to different activities and land uses;**
- e. comprises details and materials that are of high quality and complement the local character;**
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;**
- g. is inclusive and accessible for all;**
- h. promotes health;**
- i. is secure and designed to minimise crime and antisocial behaviour;**

- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Tall buildings

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

Public art

The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and

historic environment and contribute to a harmonious and balanced landscape design.

Excellence in design The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

- 5.4 Policy D1 sets out a focus on the design principles of development within Camden.
- 5.5 The new building continues the architectural detailing and follow the material palette on the existing two houses at 58 Redington Road, which have retained their original traditional form and construction. When completed, No.58a would complement and blend with the other houses in this small group. It is intended to match the remaining two houses' architectural forms, materials, construction details, fenestration, main roof, etc.



Visual Sketch of Proposed Redevelopment now being built

- 5.6 The property and curtilage lie within the Redington and Frognal Conservation Area. Also relevant is Policy D2 Heritage;

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;**
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;**
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and**
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.**

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the

proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

5.7 Camden has a rich abundance of list architectural heritage. Policy D2 demonstrates that the council will aim to preserve and enhance heritage assets. The application site lies within the Redington and Frognal Conservation Area. Camden's Conservation Area for Redington and Frognal adopted 2000 defines and analyses the importance of the area.

5.8 Redington Road is within Sub Area Four which also includes Templewood Avenue. A history of Redington Road is stated below;

Redington Road was laid out in 1875 and developed slowly starting from the Frognal (southern) end. It is the longest road in the Conservation Area and features a wide range of primarily early 20th century domestic architecture along its length. Whilst there is no consistent architectural style, red brickwork, clay tiles, dormer and sash windows are common elements to Arts and Crafts, Queen Anne, Edwardian and neo-Georgian houses alike.

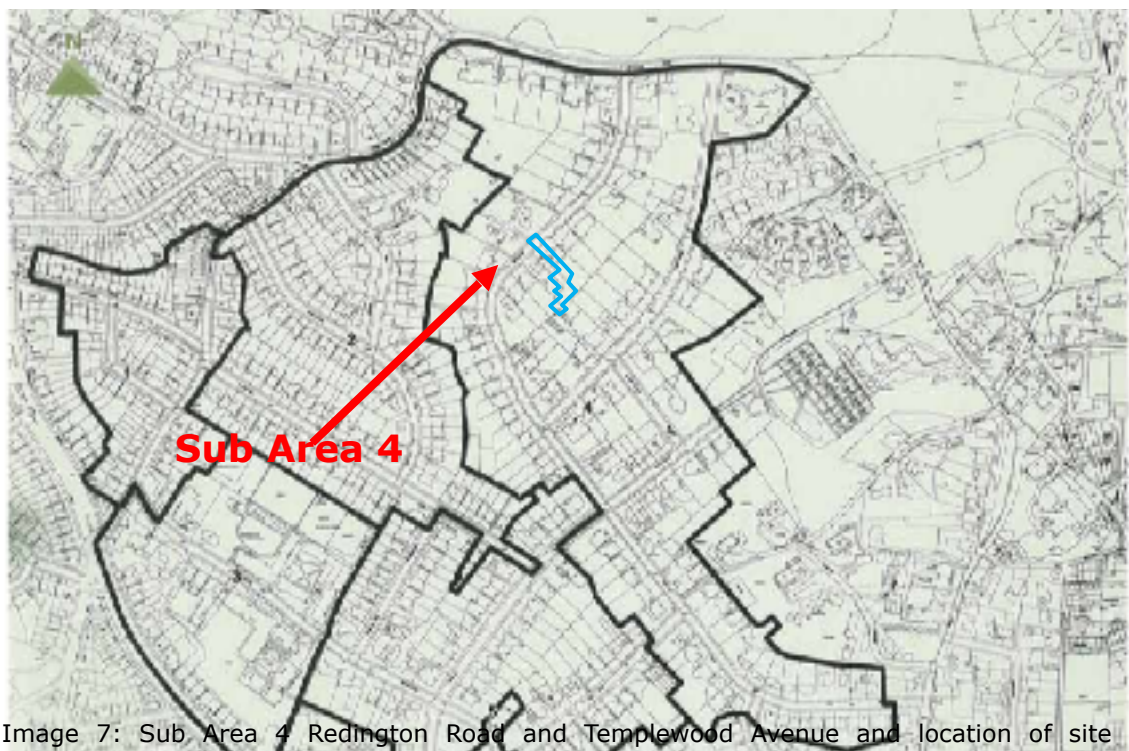


Image 7: Sub Area 4 Redington Road and Templewood Avenue and location of site (outlined in blue)

- 5.9 It goes on to list the buildings of particular interest along Redington Road and the architectural style;

Of particular interest on Redington Road are Nos. 2 & 4 designed by Phillip Webb in 1876 in a rural arts and Crafts style (listed II*); No. 16 One Oak, a fine example of the work of Arthur H, Mackmurdo (listed); Nos, 35 – 37 by Horace Field; No. 39, a well embellished house designed by W.W. Bull; No 66, The Wabe, and eclectic mix of styles and elements designed by for himself by the Educational Advisor Dr William Garnett and Nos, 54 & 56 (listed) by Quennell. The main stretches of Redington Road that are of consistent architectural style are those sections designed by Quennell at Nos, 41 – 49 and Nos, 71 – 77. The former are typical examples of the Quennell/Hart partnership between 1898 and 1914 mixing orange and red brickwork with gables oriels and occasional classical features to create a relaxed style loosely reminiscent of English architecture of the mid-17th and early 18th centuries. The latter houses are in a formal neo-Georgian style and indicate that the northern part of the road was the latest to be developed.

- 5.10 In terms of the character and relationship between buildings along Redington Road the statement comments;

The relationship between buildings and the street varies along the length of Redington Road. For example, Nos. 7 – 15 are within ten metres of the back of the pavement, whilst Nos. 16 – 28 are set back behind dense vegetation. Redington Road rises and falls a number of times along its length with its lowest point being at the junction with Heath Drive and highest point close to its north – eastern end. There are limited views between houses on the lower part of the road towards west London and longer distance views across roof and treetops can be gained from its northern end.

- 5.11 The site is also within close proximity to a number of buildings that make a positive contribution to the area and some listed buildings. This is shown in

Image 8 below. The appraisal makes no comment that the site makes a positive contribution to the area.



Image 8: Listed Buildings and buildings that make a positive contribution to the Conservation Area in relation to site (outlined in red)

- 5.12 The listed buildings are also defined on Historic England's web site. This is shown in Image 9 and is clearer than the reproduction of the Conservation area sheet.



Image 9: Location of Listed Buildings (black triangles) in relation to site (outlined in red)

- **Widening the choice of high quality homes.**

- 5.13 As a material consideration, the NPPF sets out the Government's most up to date planning policy alongside the Planning Practice Section 16 of the NPPF deals with the Conserving and enhancing the Historic Environment. Paragraph 194 advises:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment, where necessary, a field evaluation.

5.14 The decision maker has a decision to make in terms of the deliverability of enhancing or sustaining the Heritage Asset.

5.15 The NPPF paragraphs comments in paragraph 199;

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

5.16 The guidance then gives further direction to the weight to be attached to the asset's consideration.

5.17 It adds in paragraph 201:

Where a development proposal will lead to less than substantial harm (or total loss of significance) of a designated heritage asset, local authorities should refuse consent.

5.18 Para 206 requires:

Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

5.19 The proposal is located to the rear of the dwelling and is well screened. The visual impact it extremely limited and some recognition needs to be had to the Permitted Rights existing from within the GPDO for rear outbuildings and other curtilage works that only need permission though The Order. The effect on the designated heritage asset is therefore less than substantial harm and furthermore is at the lower end of this harm.

Climate Change

- 5.20 The application is supported by a detailed sustainability, energy and overheating report (SEOR) prepared by Con Serv Ltd. The report includes dynamic thermal simulation modelling.
- 5.21 The development plan also has a number of relevant policies on climate change. The key policies are CC1 and CC2. Policy CC1 advises:

Policy CC1 Climate change mitigation The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. We will:

- a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- d. support and encourage sensitive energy efficiency improvements to existing buildings;
- e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- f. expect all developments to optimise resource efficiency. For decentralised energy networks, we will promote decentralised energy by:
 - g. working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;
 - h. protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and Camden Local Plan | Sustainability and climate change 251

i. requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

5.22 Policy CC2 advises

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 runoff 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 assessment

5.23 The advice is further supplemented by planning guidance contained in the CPG Energy Efficiency and Adaption (CPG 7). At the outset the dwelling had to be designed to respect character and designed to respect the heritage asset of the Conservation Area. Matters of fenestration and orientation were therefore part of a wider design discussion. However, the house as set out below has good cooling techniques employed within its design and build. The cooling hierarchy in the local plan includes:

- **Minimise internal heat generation through energy efficient design;**
- **Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;**
- **Manage the heat within the building through exposed internal thermal mass and high ceilings;**
- **Passive ventilation;**
- **Mechanical ventilation; and**
- **Active cooling.**

5.24 The building has the normal natural cooling and openable windows. The windows also have trickle vents. The design also takes account of the stack effect and the stairwell core can reduce heat. Solar transmission is limited by the glass specification. Shading is provided in the bedrooms, study and play room.

5.25 Mechanical ventilation is also provided in the house and is designed to support this natural ventilation. This ensures removal of vitiated and moist air to help passively cool the house.

5.26 The new dwelling has sought to minimise heat gain through efficient design. For example, low energy lighting, electrical equipment housed separately. The dwelling has a good level of the preferred measures from the cooling strategy. Therefore, the cooling hierarchy is achieved

- 5.27 In addition, the building has been designed to achieve 19% reduction of CO₂ over the Building Regulations Part L1A relevant at the time of Building Notice (January 2020).
- 5.28 The Dynamic Thermal Simulation Modelling indicates that taking into account all the passive measures that overheating of the property is inevitable. This is all fully detailed in the SEOR. Accordingly, the requirement arising from CC2 (d) is complied with. The cooling hierarchy has fully informed the design and build however the modelling demonstrates the need for the active cooling.
- 5.29 Furthermore it needs to be recognised the property and installed services are designed for 30 year plus life. The design has taken account of the CIBSE 2050 Design Summer Year and it is important for good and futureproofing that the with the effects of climate change the rooms in the summer do not exceed the criteria in TM59. This design reliance is widely accepted in the development plan and national policy as being an important consideration. The dwelling is consequently designed and can accommodate different generations of the family. For older persons these extreme heat periods can be distressing and the design achieves a system to reduce the impact of extreme heat and ensure comfort for all occupiers.
- 5.30 The design solution provides further flexibility with the fan coil units providing this heating and cooling. The future proofing in design is a key consideration in ensuring buildings are built to last. The London Plan and policy D11 (c) supports building resilience and managing extreme weather events.
- 5.31 A significant benefit of the heat pumps are the CO₂ emission savings detailed in para 2.1 of the SOER. The CO₂ savings are principally from the reduction in the use of the gas system for heating and hot water to the heat pump system. This is a notable CO₂ saving and is in accordance with the objectives of The London Plan and meeting the requirements of the NPPF.

- 5.32 Therefore the key criteria of Policy CC1 are a, b, d and f are achieved. The thrust of these policies is to reduce carbon dioxide emissions which meet the London plan targets and encourage energy efficiency. This guidance is supported by the NPPF in paras 153-154. The key issues being to ensure a positive approach to climate change, encouraging building resilience and reducing gashouse emissions.
- 5.33 The proposal demonstrates a saving of CO₂. A central component of the London Plan and Camden Guidance is to seek a reduction in carbon emissions, and this is achieved. Additionally, the proposal provides resilience for the building which is good design and supported again in the development plan.

Noise

- 5.34 Noise can be a material consideration and the units are contained in acoustic units. A noise report is enclosed prepared by NOICO.
- 5.35 The noise report is prepared with meter readings and using the upper noise level estimations from the manufacturer. The units are contained in some acoustic enclosures.
- 5.36 The acoustic enclosure will be manufactured from a combination of acoustic panel-work and suitably sized acoustic louvres (or attenuating splitter elements) which shall allow airflow into and out of the condensing units contained within. Plenum plates should be incorporated within the enclosure in order to prevent recirculation/short-circuiting of air. The enclosures will reduce the noise level from the plant to an acceptable level.
- 5.37 This has been discussed with the local authority.
- 5.38 The proposal can therefore be considered in accordance Policy A1(a) and factor J and Policy A4(a).

5.39 It is for these reasons that conditional planning permission can be granted.