



Planning Statement

2 Villas on the Heath
London NW3 1BA -
Refurbishment and
Alterations

April 2024 | Project Ref 0000A



Project Number: 9840

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1. Introduction

- 1.1** This Planning Statement has been prepared by HCUK Group on behalf of Kudos Design & Build Ltd to support a planning application and listed building consent for the proposed refurbishment and alteration works at 2 Villas on the Heath, a grade II listed semi-detached Victorian villa located in the Hampstead Heath Conservation Area, London NW3 1BA. The property forms part of a symmetrical pair with the adjoining property at 1 Villas on the Heath.
- 1.2** The proposed works include internal layout changes, installation of an air source heat pump (ASHP) with associated enclosure, underfloor heating, replacement of a modern rooflight, and various internal decorative upgrades and replacements. The scheme aims to enhance the property's energy efficiency and environmental performance while respecting its historic character and architectural significance.
- 1.3** This statement will assess the proposals against relevant planning policies at the national, regional, and local levels, focusing on heritage conservation, sustainable design, residential amenity, and environmental impact. It will also consider the planning history of the site and adjacent properties to inform the assessment. The key objectives are to demonstrate that the proposed alterations are sensitive to the listed building, preserve the conservation area's character, and align with sustainability goals, preserve the conservation area's character, and align with sustainability goals.

2. Site and Surrounding Area

Site

- 2.1** 2 Villas on the Heath is a semi-detached, grade II listed building situated on the Vale of Heath, to the south west of Hampstead Heath and within the Hampstead Heath Conservation Area. The property, which dates back to circa 1863, is constructed in the Gothic Revival style, featuring stuccoed elevations and a tiled roof. The building comprises lower ground, ground, two upper floors, and an attic level.



Figure 1: Site and location plan for the application site

- 2.2** The front elevation of the property is characterised by pointed arch windows, decorative hood moulds, and carved bargeboards at the eaves. The property features a small front garden and is set back from the street, accessed via a shared footpath. To the rear, there is a larger garden, a two-storey outrigger with a non-

original hipped roof, and a modern ground floor extension that incorporates a former courtyard area.

- 2.3** Internally, the property retains much of its original layout and period features, including spacious reception rooms, high ceilings, and decorative plasterwork. The attic level has been converted to provide additional habitable space, following a previous planning permission.

Surrounding Area

- 2.4** The Vale of Health is a residential enclave located within the Hampstead Heath Conservation Area, known for its picturesque setting and architectural heritage. The area is characterised by a mix of detached and semi-detached properties dating from the mid to late 19th century, many of which exhibit Gothic Revival and other Victorian architectural styles.
- 2.5** The street on which 2 Villas on the Heath is located is quiet and tree-lined, with limited vehicular access. The surrounding area features a range of local amenities, including shops, cafes, and green spaces. Hampstead High Street, located nearby, offers a variety of independent boutiques, restaurants, and cultural attractions.
- 2.6** The property is situated in close proximity to Hampstead Heath, a large public park. The Heath is a significant natural asset and contributes to the unique character and setting of the conservation area.
- 2.7** In terms of transport links, the property is well-connected, with Hampstead Heath Overground station and several bus routes located within walking distance. Hampstead Underground station, which provides access to the Northern Line, is within easy walking distance of the site.

3. Proposal

3.1 The proposed development at 2 Villas on the Heath involves the sensitive refurbishment and upgrading of the grade II listed property to enhance its energy efficiency, sustainability, and functionality while preserving its historic character and architectural significance. The works include internal layout alterations, the installation of an air source heat pump (ASHP), underfloor heating on ground floor, the replacement of a modern rooflight, and various internal refurbishment works.

Internal Layout Changes

3.2 The proposal includes several internal layout modifications to improve the property's usability and comfort. These changes include:

- Reconfiguration of the rear outrigger to incorporate a new utility room and shower room.
- Relocation of the kitchen to the former courtyard area on the ground floor.
- Creation of a new bathroom layout on the first floor.
- Reconfiguration of the second-floor en-suite.

Air Source Heat Pump (ASHP) Installation

3.3 To enhance the property's energy efficiency and diminish its carbon footprint, an air source heat pump (ASHP) is propose to be installed atop the modern outrigger extension situated at the rear of the property. It will not be affixed to any wall or roof facing a public highway, nor will it be closer to any bounding highway than the nearest part of the building. The ASHP will be housed within a plant enclosure painted in dark grey to harmonize with the rear elevation of the building. The ASHP will be situated approximately 5-6m away from the upper floor rear windows of 5 Vale of Heath.

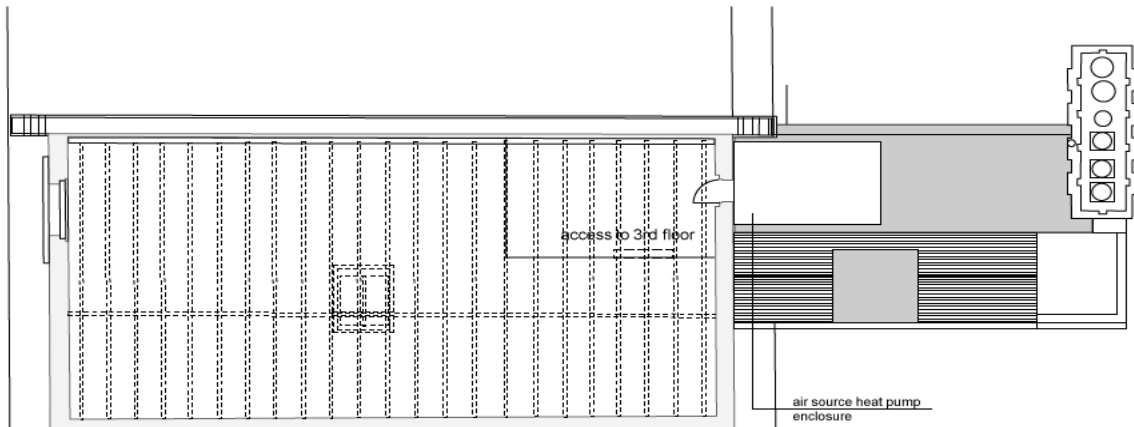


Figure 2: Fourth Floor Plans showing location of ASHP

3.4 The ASHP will be carefully positioned and enclosed to minimise its visual impact on the listed building and surrounding conservation area. The installation will be carried out in accordance with the manufacturer's guidelines and relevant building regulations.

Sky Light and Roof Light Replacements

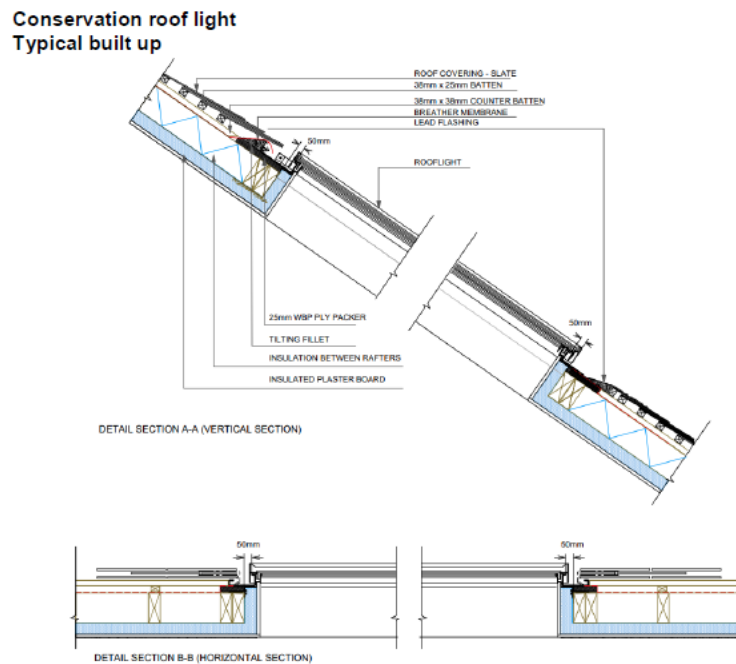
3.5 The proposal includes the replacement of two rooflights, one located on the roof of the main part of the dwelling and the second located on the ground floor extension (described as a skylight hereafter). The existing skylight in the ground floor extension is a modern addition that detracts from the property's historic character. The existing rooflight is of poor architectural quality and does not complement the listed building's aesthetic. The new skylight will be designed to sit flush with the flat roof, minimizing its visual impact on the building's exterior. The replacement skylight will be selected to match the size and proportions of the existing opening.



Figure 3: Images of Ground floor Roof light (left) and Proposed Replacement Roof light (right)

3.6 The conservation-style skylight will be constructed using materials and finishes that are appropriate for use on a listed building, such as slimline metal frames and clear, low-profile glazing. The replacement rooflight will improve the natural light within the ground floor extension while enhancing the overall appearance and better respecting the property's historic character.

3.7 With regard to the rooflight on the sloped roof of the main part of the dwelling, this will be replaced like-for-like with a conservation-style rooflight. Similarly, the new rooflight will be designed to sit flush with the existing roof slope and will be constructed using materials and finishes appropriate for use on a listed building. The replacement rooflight will match the size and proportions of the existing opening, ensuring that it integrates seamlessly with the surrounding roof fabric and maintains the historic character of the building.



Internal Refurbishment Works

3.8 The proposal includes a range of internal refurbishment works to restore and enhance the property's historic features while improving its overall condition and performance. These works include:

- Repair and restoration of original shutters on the ground floor front windows.
- Reinstatement of period-appropriate skirting boards, cornices, and ceiling roses.
- Installation of new engineered oak floorboards with acoustic insulation on upper floor.
- Upgrades to doors and ironmongery to match the property's historic character.
- Refurbishment of fireplaces in the main reception rooms and bedrooms.

3.9 The proposed works at 2 Villas on the Heath include the sensitive installation of underfloor heating throughout the ground floor. The original floorboards will be retained, and insulation will be introduced between the joists to improve the building's thermal performance. The underfloor heating will allow for the removal of radiators and the visual reinstatement of chimney breasts as the heating focus of each room, enhancing the architectural and historic character of the interior spaces.

Roof Repairs and Insulation

- 3.10** To address structural defects and improve thermal performance, the roof will be carefully repaired and upgraded. The existing roof tiles will be removed, and any necessary repairs to the roof structure will be carried out. A new breathable membrane and insulation will be installed, and the original tiles will be reinstated to maintain the roof's appearance. Where replacement of roof timbers is required, materials will be selected to match the existing roof structure closely.
- 3.11** These proposed works have been carefully considered to balance the preservation of the listed building's historic character with the need for improved energy efficiency, sustainability, and modern comfort. The scheme aims to secure the property's long-term future while respecting its architectural and cultural significance within the Hampstead Conservation Area.

4. Planning History

4.1 The property at 2 Villas on the Heath has been subject to several planning applications and listed building consent applications over the years. The most relevant applications to the current proposal are as follows:

- **Application ref: 1/3792/L** (Granted 06-09-2021) Discharge of condition 4 of listed building consent application 2020/1595/L regarding windows and staircase.
- **Application ref: 2020/1595/L** (Granted 03-04-2020) Internal and external alterations in association with conversion of attic to habitable space and installation of 3 new rooflights.
- **Application ref: 2020/1026/P** (Granted 03-04-2020) Conversion of attic to habitable space and installation of 3 new rooflights.
- **Application ref: LW9703090** (Granted with Conditions 12-12-1997) Internal alterations at ground and first floor levels, including retention of unauthorised works.

Assessment of Planning History

4.2 The planning history of 2 Villas on the Heath provides valuable context for assessing the potential acceptability of the current proposals:

4.3 Internal alterations, particularly those involving the replacement of non-historic fabric and minor works that closely match the existing building, have been considered acceptable in principle, subject to the works safeguarding the special architectural interest of the listed building and avoiding the loss of historic character or fabric.

4.4 The installation of rooflights has been accepted, subject to the use of appropriate materials, design, and positioning to minimise their impact on the listed building and the conservation area.

4.5 The current proposals for the installation of an air source heat pump, the replacement of a modern rooflight, and associated internal refurbishment works at

2 Villas on the Heath should be developed with due regard to the principles established through the property's planning history. In particular:

- The replacement of the modern rooflight should be sensitively designed to respect the listed building's historic character and appearance, with careful consideration given to the style, materials, and positioning of the new rooflight.
- The installation of the air source heat pump should be sensitively located and designed to minimise its visual impact on the listed building and the conservation area, with due consideration given to the potential for noise and vibration which might affect neighbouring properties.

4.6

By developing the proposals in accordance with these principles, and with due regard to the specific details of the listed building and its setting, it is considered that the current scheme has the potential to secure planning permission and listed building consent, subject to the provision of appropriate supporting information and detailed design.

5. Planning Policy Framework

Key Planning Policies

5.1 The following development plan documents have been considered;

- London Plan 2021
- Camden Local Plan 2017
- Hampstead Neighbourhood Plan 2018-2033

5.2 National Planning Policy Framework (NPPF) and Camden Planning Guidance (CPG) covering; Amenity, Design and Energy efficiency and adaptation and conservation area appraisals are material considerations when assessing the site and proposed works.

5.3 Additionally, Camden's emerging Local Plan is at Regulation 18 stage represents a material consideration.

London Plan 2021

5.4 The London Plan serves as the spatial development strategy for Greater London, providing the strategic framework to shape individual borough plans and guide planning decisions across the city. First published in 2004, the current London Plan was adopted on 2nd March 2021.

5.5 **Policy HC1 – Heritage Conservation and Growth** states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

5.6 **Policy D14 - Noise** seeks to manage and mitigate noise impacts from development to support improvements in health and quality of life. It requires

avoiding any significant adverse effects from noise or vibration through appropriate design, layout, operational controls etc.

5.7 **Policy SI 2 – Minimising Greenhouse Gas Emission** states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- Be lean: use less energy and manage demand during operation.
- Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- Be seen: monitor, verify and report on energy performance.

5.8 **Policy GG6 - Increasing Efficiency and Resilience** establishes four broad objectives which those involved in planning and development should adhere to in order to make London more efficient and resilient overall. These encompass improving energy efficiency, ensuring infrastructure like buildings are adapted to climate change risks, creating environments that are safe and secure in the face of emergencies.

Adopted Camden Local Plan 2016 – 2025

5.9 The Camden Local Plan sets out the Council's planning policies for 2016-2031, replacing previous documents from 2010.

5.10 **Policy A1 - Managing the Impact of Development** is one of the Local Plan's key amenity protection policies. It establishes that permission will not be granted for development causing unacceptable harm. This covers an array of considerations like privacy, access to daylight and sunlight, artificial lighting, noise and vibration disturbance, and construction/demolition impacts. Where negative effects can't be fully avoided, the policy requires appropriate mitigating actions demonstrated through assessments such as noise surveys and Construction Management Plans.

5.11 **Policy D2 - Heritage** asserts a strong presumption against approving development that causes harm to designated heritage assets, chiefly listed buildings,

conservation areas and archaeological remains, or their significance and setting. Any loss or substantial harm requires robust and convincing justification evidencing substantial public benefits outweighing the impacts.

5.12 Where less than substantial harm may occur, the public benefits must still outweigh the level of damage to significance. All works must remain sensitive to the assets' architectural detailing and historic period, conserve original fabric as far as possible, and take opportunities to enhance understanding of significance where feasible.

5.13 **Policy D1 - Design** demands contextually appropriate, high quality design consistently across development schemes. Specifically, proposals must function well long-term; appear visually attractive; complement local character, respond appropriately to natural features and heritage assets; and integrate service infrastructure sensitively.

5.14 **Policy CC1 Climate change** mitigation establishes expectations for minimising greenhouse gas emissions from development across Camden to mitigate contribution to climate change. This policy applies to all projects with additional stipulations for major development. It seeks to promote zero carbon buildings requiring demonstration from all development as to how energy hierarchy principles for maximising efficiency have been embedded in line with London Plan carbon targets. There is an expectation for developments to incorporate resource efficiency across circular economy principles.

Emerging Camden Local Plan Policies

5.15 The emerging Local Plan currently at Regulation 18 stage sets out the Council's planning policies for 2026 - 2041, replacing the current adopted local plan.

5.16 **Policy D5 - Heritage** outlines Camden Council's commitment to preserving and enhancing the area's diverse heritage assets, including conservation areas, listed buildings, and historic sites. It prohibits loss or substantial harm to these assets unless justified by substantial public benefits or specific criteria. The policy opposes cumulative changes to heritage assets that could impact their significance or harm conservation areas. It supports adapting listed buildings and conservation area buildings to improve energy efficiency and climate resilience, provided there's no significant harm to their historic or architectural interest.

5.17 Policy CC2 – Repurposing, Refurbishment and Re-use of Existing Buildings seeks building reuse over demolition, but as a smaller retrofit scheme feasibility assessments and justifications around demolition avoidance carry less weight proportionately. However, alterations must demonstrate sensitivity around retaining original architectural fabric and detail as far as viable.

5.18 Policy CC3 – Circular Economy and Reduction of Waste expects developments to apply waste minimisation hierarchy principles. While circular economy assessments apply to major new builds, the policy's intent around maximizing in-situ material reuse, using sustainably sourced components, facilitating future adaptability etc. remains applicable.

5.19 Policy CC5 – Energy Reduction in Existing Buildings seeks to support adaptations and improvements to make existing buildings more energy efficient. It sets out requirements for all building alteration proposals to demonstrate considered energy efficiency improvements appropriate to the scale of the proposed works.

5.20 Under Policy CC5 **paragraph 8.45** states:

"Where air source heat pumps are proposed it is recommended that works to improve the energy efficiency of the building, such as additional insulation and draught proofing, are incorporated. A whole house approach to energy reduction would ensure retrofit improvements work well together. This would also help to ensure that the size and noise impact of the heat pump is reduced as much as possible."

5.21 Additionally in **paragraph 8.47** it states :

"To reduce noise impact further it is advised that the air source heat pump is installed away from neighbouring property."

Hampstead Neighbourhood Plan 2018-2033

5.22 Hampstead Neighbourhood Plan supplements the borough-level Camden Local Plan with policies tailored to the distinct circumstances and community aspirations of the Hampstead area until 2033.

5.23 **Policy DH1 - Design** requires all development proposals to demonstrate through their details that they positively respond and contribute to the established character of Hampstead. This principally involves having regard to the spatial attributes, land uses, architectural styles and heritage elements that define each of the five identified local character areas, as outlined in detail within Appendix 2 of the Plan. Developments must reflect prevailing building lines, site footprints, massing, scale, heights, rhythms, materials and boundary treatments.

5.24 The Neighbourhood Plan as a whole includes the aim of promoting sustainable development that preserves Hampstead's unique charm and essence, ranging from the quality of life afforded by green spaces through to the creativity enabled by the artistic community, while supporting local housing needs and the area's vitality.

National Planning Policy Framework (December 2023)

5.25 With regard to heritage and the NPPF this section should be read in conjunction with the attached Heritage statement.

Chapter 2 - Achieving sustainable development

5.26 **Paragraph 8** sets out the environmental objective of sustainable development as protecting, enhancing and prudently using natural resources, as well as mitigating/adapting to climate change including moving to a low carbon economy.

Chapter 12 - Achieving well-designed and beautiful places

5.27 **Paragraph 135** states that planning policies and decisions should 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; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

5.28 **Paragraph 140** states planning conditions should provide visual clarity on approved design and materials.

Chapter 14 - Meeting the challenge of climate change, flooding and coastal change

5.29 **Paragraph 157** states that planning policies and decisions should support transition to a low carbon future, encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.30 **Paragraph 162 part a)** states that local authorities should expect new development to comply with development plan policies on local requirements for decentralised energy unless applicants can demonstrate this is not feasible or viable based on the development details. **Part b)** sets out an expectation for development proposals having regard to landform, layout, building orientation, massing and landscaping in ways that minimise energy consumption.

5.31 **Paragraph 163 part a)** asserts local authorities should not require applicants to demonstrate overall renewable or low carbon energy needs. Even small-scale projects make a valuable contribution to emissions reductions. **Part b)** expects the approval of renewable applications if their impacts can be made acceptable.

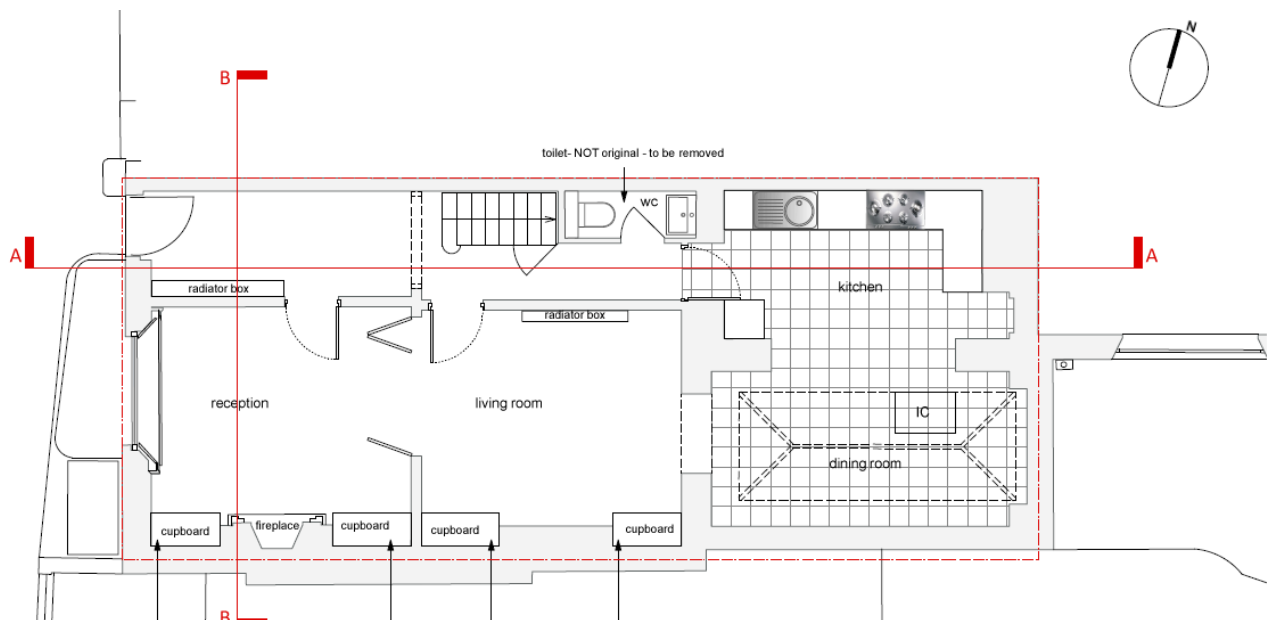
5.32 **Paragraph 164** states that local planning authorities should give significant weight to supporting building energy efficiency and low carbon heating improvements, including heat pumps and solar panels. This covers domestic and non-domestic structures. Where proposals affect heritage assets, authorities should concurrently apply Chapter 16 policies to avoid unacceptable impacts.

6. Planning Assessment

Principle of Development

6.1 The application site, 2 Villas on the Heath, is a grade II listed building located within the Hampstead Conservation Area. The proposed development involves the sensitive refurbishment and upgrading of the property to enhance its energy efficiency, sustainability, and functionality while preserving its historic character and architectural significance.

6.2 The principle of the proposed development is supported by the National Planning Policy Framework (NPPF) and the London Plan 2021. Paragraph 8 of the NPPF sets out the environmental objective of sustainable development, which includes mitigating and adapting to climate change and moving towards a low carbon economy. Policy SI 2 of the London Plan 2021 encourages the reduction of greenhouse gas emissions and the minimization of energy demand in accordance with the energy hierarchy.



6.3 The proposed works, including internal layout changes, the installation of an air source heat pump (ASHP), the replacement of a modern rooflight, and various internal refurbishment works, are consistent with the objectives of sustainable

development and the sensitive adaptation of historic buildings to improve their energy efficiency and functionality.

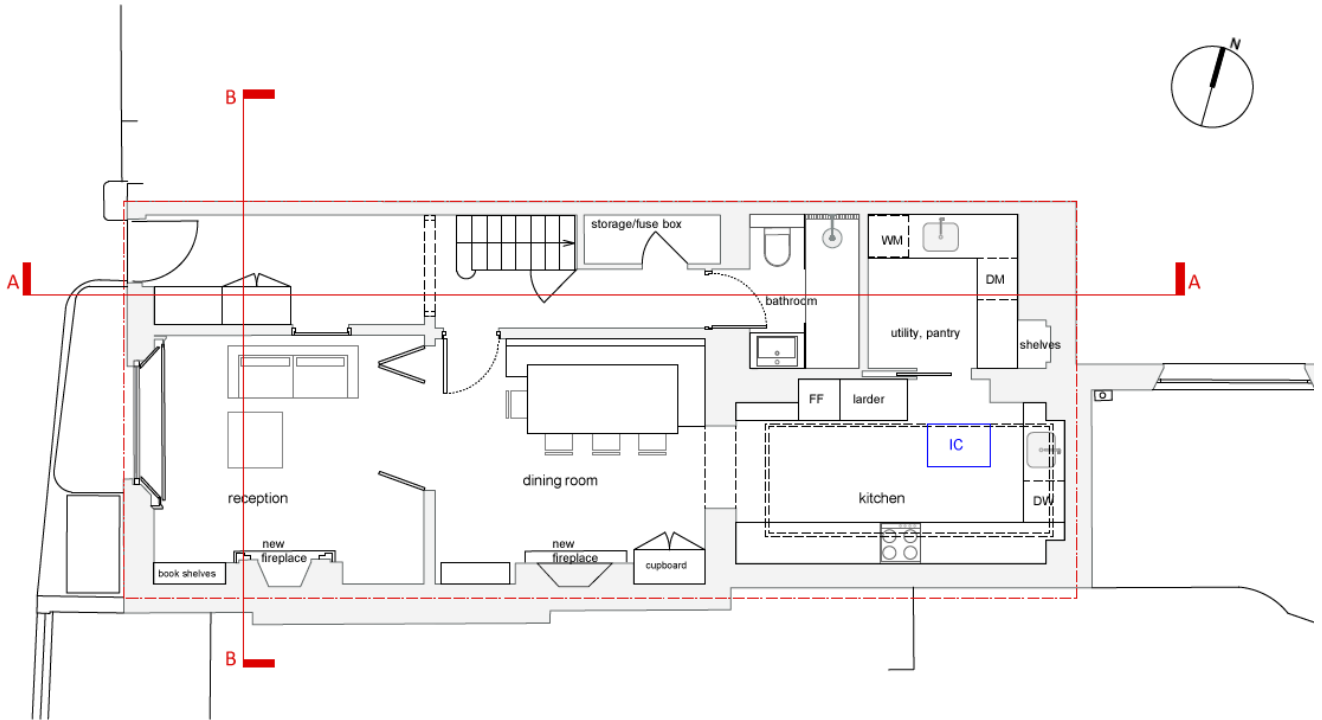


Figure 5: Proposed Ground Layout

6.4 On balance, it is considered that the principle of the proposed development is acceptable, subject to the detailed consideration of its impact on heritage assets, residential amenity, design and character, and climate change mitigation. The proposal complies with the principles set out in the NPPF, the London Plan 2021, Policy D2 of the Camden Local Plan 2017, and Policy D5 of the emerging Camden Local Plan.

Residential Amenity

- 6.5** With regard to the amenity of neighbouring residents, the proposed development has been carefully designed to minimise any potential adverse impacts. A key consideration is the potential noise impact from the installation of the air source heat pump (ASHP).
- 6.6** An acoustic report has been prepared to assess the noise impact of the ASHP on the nearest noise-sensitive facade, which is located approximately 5-6m away at the upper floor rear windows of 5 Vale of Heath. The report demonstrates that the noise level generated by the ASHP will be 17dBA, which meets the local authority's criteria for the lowest observed adverse effect level (LOAEL).
- 6.7** The installation of the ASHP will be carried out in accordance with the manufacturer's guidelines and relevant building regulations to ensure that noise and vibration levels are kept within acceptable limits, in line with Policy D14 of the London Plan 2021 and Policy A1 of the Camden Local Plan 2017. The ASHP will be carefully positioned and enclosed to minimise its visual impact on the listed building and surrounding conservation area.
- 6.8** The replacement of the rooflight, skylight, and the internal refurbishment works are not expected to have any significant impact on the amenity of neighbouring properties, as these works are largely contained within the existing building envelope.
- 6.9** During the construction phase, appropriate measures will be put in place to mitigate any potential disturbance to neighbouring residents, such as controlling hours of work and implementing dust suppression techniques. These measures will be secured through a Construction Management Plan, as required by Policy A1 of the Camden Local Plan 2017.
- 6.10** On balance, it is considered that the proposal would not have any unacceptable impacts on residential amenity or the living conditions of the adjoining neighbours, as demonstrated by the findings of the acoustic report and the careful design of the proposed works. The development will therefore comply with Policy A1 of the Camden Local Plan 2017, Policy D14 of the London Plan 2021, and Paragraph 130 of the NPPF.

Design and Character

- 6.11** The Design and Access Statement (DAS) should be read in conjunction with this Planning Statement. The DAS explains the rationale and the evolution of the design process and is not repeated here.
- 6.12** With regard to design and character, the proposed development has been sensitively designed to respect the historic character and appearance of the grade II listed building and the Hampstead Conservation Area. The replacement of the modern rooflight with a conservation-style rooflight will enhance the property's historic character, while the internal refurbishment works will restore and reinstate period-appropriate features and details. The proposal has been assessed against Policy D1 of the Camden Local Plan 2017, which requires development to be of high-quality design that respects local character and context. The proposed works are considered to be sympathetic to the architectural style and detailing of the listed building and will not detract from its special interest or the character and appearance of the conservation area.



Figure 6: External photographs showcasing the Grade II listed building's architectural features and its setting within the conservation area

6.13 The proposal also complies with Policy DH1 of the Hampstead Neighbourhood Plan 2018-2033, which requires development to positively respond to and contribute to the established character of Hampstead. The proposed works will maintain the building's historic character and will not harm the spatial attributes, architectural styles, or heritage elements that define the local character area.




Figure 7: Internal photographs highlighting the current condition of the property and any existing period features

6.14 In conclusion, the proposed development is considered to be of high-quality design that respects the historic character and appearance of the listed building and the conservation area. The proposal complies with Policy D1 of the Camden Local Plan 2017, Policy HC1 of the London Plan 2021, Policy DH1 of the Hampstead Neighbourhood Plan 2018-2033, and Section 16 of the NPPF.

Climate Change

6.15 A key objective of this proposal is to improve the energy efficiency and sustainability of the historic building while respecting its architectural and cultural significance. The installation of the air source heat pump (ASHP) on the roof of the modern outrigger extension and the upgrading of the building fabric, including the roof repairs and insulation improvements, will contribute to the reduction of greenhouse gas emissions and the adaptation of the building to climate change risks.

6.16 The proposal has been assessed against Policy CC1 of the Camden Local Plan 2017, which seeks to minimise greenhouse gas emissions from development across



Outdoor Units		Single Phase			
		ERLA11DV3	ERLA14DV3	ERLA16DV37	
Description		Class 11	Class 14	Class 16	
Trade Unit Price		£3,564.00	£4,106.00	£4,489.00	
Dimensions	Height x Width x Depth mm	870 x 1100 x 460	870 x 1100 x 460	870 x 1100 x 460	
Weight	kg	101	101	101	
Nominal capacity	Heating (a/b)	11.00 / 9.82	12.06 / 12.58	16.00 / 16.00	
	Cooling (a/b)	11.20 / 12.09	13.18 / 13.38	13.90 / 15.90	
Nominal input	Heating (a/b)	3.18/2.68	3.46/1.42	3.53/4.56	
	Cooling (a/b)	3.43/2.52	4.32/2.86	4.68/3.82	
COP	Heating (a/b)	4.83/3.66	4.87/3.64	4.53/3.51	
	Space heating	Class	A+++	A+++	A+++
Seasonal space heating efficiency*	(Average climate) 35°C	Efficiency	181	181	181
	SCOP	4.65	4.60	4.61	
Space heating	Class	A+++	A+++	A+++	
	(Average climate) 35°C	Efficiency	126	126	130
	SCOP	3.25	3.23	3.32	
EER	Cooling	4.75	4.66	4.16	
Operation range	Heating °C	-25-35	-25-35	-25-35	
	Cooling °C	18-43	10-43	16-43	
	Hot water °C	-25-35	-25-35	-25-35	
Sound pressure / power level	Heating dB(A)	48 / 62	48 / 62	48 / 62	
	Cooling dB(A)	48 / 62	48 / 62	48 / 62	
Refrigerant charge	R-32 kg	3.8	3.8	3.8	
Piping connections	Liquid inches (mm)	3/8 (9.5)	3/8 (9.5)	3/8 (9.5)	
	Gas inches (mm)	1/8 (15.8)	5/8 (15.9)	5/8 (15.9)	

Figure 8: Proposed ASHP - Daikin ERLA16DV37

Camden. The proposed works will improve the energy efficiency of the building and reduce its carbon footprint, in line with the objectives of this policy and Policy SI 2 of the London Plan 2021.

6.17 The proposal also complies with emerging Policy CC5 of the Draft Camden Local Plan, which supports adaptations and improvements to existing buildings to make them more energy efficient. The proposed works will incorporate energy efficiency measures, such as improved insulation and draft proofing, to ensure that the size and noise impact of the ASHP is reduced as much as possible, as recommended in paragraph 8.45 of the emerging policy.

6.18 The sensitive approach to retrofitting the historic building aligns with the principles of Policy CC2 of the emerging Camden Local Plan, which seeks to prioritise the reuse and refurbishment of existing buildings over demolition, while ensuring that alterations are carried out with sensitivity to the original architectural fabric and details.

- 6.19** On balance, the proposed development is considered to make a positive contribution to climate change mitigation and adaptation, in accordance with Policy CC1 of the Camden Local Plan 2017, Policy SI 2 of the London Plan 2021, emerging Policies CC2 and CC5 of the Draft Camden Local Plan, and Paragraph 152 of the NPPF.

Heritage

- 6.20** The Heritage Impact Assessment should be read in conjunction with this Planning Statement. The Heritage Statement provides a detailed assessment of the heritage significance of the grade II listed building and the Hampstead Conservation Area, and considers the impact of the proposed development on that significance. The findings of the Heritage Impact Assessment are not repeated in full here but are summarised below.
- 6.21** The proposed works, including the installation of the air source heat pump (ASHP) on the roof of the modern outrigger extension, the replacement of the modern rooflight with a conservation-style rooflight, and the internal refurbishment works, have been sensitively designed to enhance the property's historic character and to preserve its special architectural interest. The proposal complies with Policy D2 of the Camden Local Plan 2017, which seeks to conserve and enhance the historic environment, and Policy HC1 of the London Plan 2021, which requires development proposals to conserve heritage assets and their settings.
- 6.22** The internal refurbishment works will restore and reinstate period-appropriate features and details, such as skirting boards, cornices, and ceiling roses, which will enhance the property's historic character and contribute to the preservation of its special interest. The works will be carried out using materials and finishes that are appropriate for use on a listed building, in accordance with best practice conservation principles.

6.23 The replacement of the modern skylight above the former courtyard area with a new, lower profile conservation-style rooflight and the like-for-like replacement of the rooflight on the sloped roof of the main dwelling have been carefully considered to enhance the property's historic character and appearance. The new rooflights will be sourced from The Rooflight Company's Conservation Range, designed to sit flush with the roof slope and featuring a vertical emphasis and a single central glazing bar (where appropriate). The rooflights will be fitted in line with the clay tiles and constructed using materials and finishes appropriate for a listed building. These changes will not detract from the character or appearance of the conservation area and will improve the visual coherence of the rear elevation and the main roof slope.

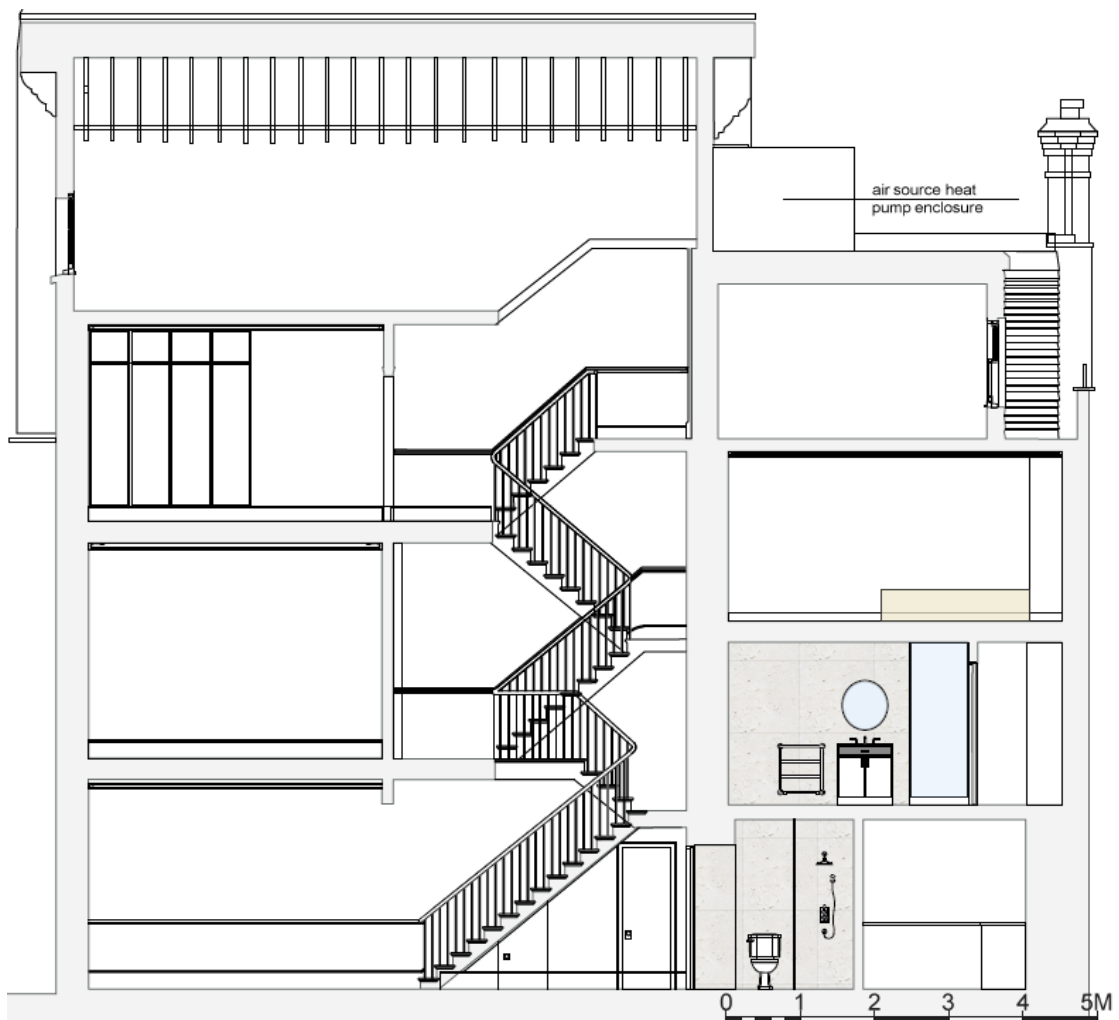


Figure 9: Section showing Location of ASHP

6.24 The ASHP will be carefully positioned on the roof of the modern outrigger extension, which is located to the rear of the main listed building and set back from the

principal elevation. This location has been chosen to minimise the visual impact of the ASHP on the listed building and the surrounding conservation area. The heritage impact assessment concludes that the proposed location of the ASHP would not detrimentally affect views of the rear elevation of the listed building or views within the conservation area.

6.25 The proposal has been assessed against the relevant policies of the NPPF, particularly Chapter 16, which sets out the Government's approach to conserving and enhancing the historic environment. The proposed works are considered to comply with the NPPF, as they will conserve the heritage asset and its setting, and will not result in any substantial harm to its significance.

6.26 On balance, it is considered that the proposed development will enhance the heritage significance of the Grade II listed building and will preserve the character and appearance of the Hampstead Conservation Area. The proposal complies with Policy D2 of the Camden Local Plan 2017, Policy HC1 of the London Plan 2021, and Chapter 16 of the NPPF.

Sustainability

6.27 A key goal of the proposal is to renovate the property to a standard as close to EnerPHit (Passive House retrofit) as possible, thereby significantly improving its thermal performance and energy efficiency. This approach aligns with Policy SI 2 of the London Plan 2021, which seeks to minimise greenhouse gas emissions and energy demand in accordance with the energy hierarchy.

6.28 The proposed works include a range of measures that have been proven to be effective in achieving significant energy savings in existing buildings, such as improved thermal insulation, reduction of thermal bridges, enhanced airtightness, use of high-quality windows, and efficient heat generation. These measures are consistent with the principles set out in Policy CC1 of the Camden Local Plan 2017 and emerging Policy CC5 of the Draft Camden Local Plan, which support adaptations and improvements to existing buildings to make them more energy efficient.

6.29 The applicant has also taken into account the guidance provided in Camden's Energy Efficiency and Adaptation SPD, which encourages the installation of

renewable energy technologies and energy efficiency improvements in listed buildings and conservation areas, subject to working with heritage and conservation officers to determine an acceptable strategy. The proposed installation of an air source heat pump (ASHP) to replace the existing boiler is a key element of the sustainability strategy, which will significantly reduce the property's reliance on fossil fuels and lower its carbon emissions.

- 6.30** In addition to the ASHP, the proposal incorporates a range of other sustainable design features, such as low-energy lighting, heavy curtains and blinds, rugs on upper floors, roof insulation, and draft proofing. These measures will work together to reduce energy consumption and improve the overall energy performance of the building.
- 6.31** The applicant has also considered the embodied carbon of the proposed works, seeking to maximize the reuse of existing materials and specifying sustainable, low-carbon materials where new elements are required. This approach aligns with the principles of Policy CC3 of the emerging Camden Local Plan, which seeks to promote a circular economy and reduce waste in development.
- 6.32** Furthermore, the proposed works will improve the resilience of the building to the impacts of climate change, particularly overheating, through measures such as improved insulation and natural ventilation. This is consistent with Policy SI 4 of the London Plan 2021, which requires development proposals to minimise overheating and reduce reliance on air conditioning systems.
- 6.33** On balance, it is considered that the proposed development represents a comprehensive and ambitious approach to sustainability, which will deliver significant improvements in the energy efficiency and environmental performance of the Grade II listed building while respecting its historic character and significance. The proposal complies with the relevant policies of the London Plan 2021, the Camden Local Plan 2017, and the emerging Camden Local Plan, and is consistent with the objectives of sustainable development set out in the NPPF.
- 6.34** The Heritage Impact Assessment (paragraphs 5.4 to 5.7) confirms that the proposed underfloor heating installation has been carefully designed to avoid any detrimental impact on the historic fabric of the listed building. The original floorboards will be retained, and the installation will facilitate the removal of

radiators, visually reinstating the chimney breasts as the heating focus of each room. The works will also improve the thermal performance of the building through the introduction of appropriate insulation between the joists, in line with the sustainability objectives set out in the NPPF and local planning policies

7. Planning Balance

- 7.1** In weighing up the planning balance, it is considered that the proposed development would deliver significant benefits in terms of the sensitive refurbishment and upgrading of the grade II listed building to enhance its energy efficiency, sustainability, and functionality while preserving its historic character and architectural significance.
- 7.2** The proposed works have been carefully considered to minimise any potential adverse impacts on heritage assets, residential amenity, design and character, and climate change mitigation. The proposal is in accordance with the relevant policies of the NPPF, the London Plan 2021, the Camden Local Plan 2017, the emerging Camden Local Plan, and the Hampstead Neighbourhood Plan 2018-2033.
- 7.3** The proposed installation of the air source heat pump (ASHP) on the roof of the modern outrigger extension largely complies with the conditions that would apply if the property were not located within a conservation area and subject to an Article 4 Direction. The ASHP complies with MCS Planning Standards or equivalent standards, proposes only one unit, does not exceed a volume of 0.6 cubic meters, is set back at least 1m from the property boundary, is used only for heating purposes, is positioned to minimise its impact on the external appearance of the building and amenity of the area.
- 7.4** Moreover, the proposed location of the ASHP fully complies with the additional conservation area requirements, as it is not installed on a wall or roof which fronts a highway and is not nearer to any highway bounding the curtilage than the part of the building nearest to that highway. The Heritage Impact Assessment concludes that the proposed location is well-screened and would not detrimentally affect views of the rear elevation of the listed building or views within the conservation area.
- 7.5** The acoustic report demonstrates that the proposed location of the ASHP, approximately 5-6m from the nearest noise-sensitive facade (upper floor rear windows of 5 Vale of Heath), would result in a noise level of 17dBA, which meets the local authority's criteria for the lowest observed adverse effect level (LOAEL).

- 7.6** In addition to the ASHP installation, the proposed development includes a range of internal and external works that will enhance the building's historic character, energy efficiency, and sustainability. These works include the reinstatement of period-appropriate features, the introduction of insulation and underfloor heating, the replacement of the modern rooflight with a conservation-style rooflight, and repairs to the roof structure. The public benefits of the proposal, including the enhancement of the historic building's energy efficiency and sustainability, and the preservation and enhancement of the heritage asset, are considered to outweigh any limited harm that may arise from the works.
- 7.7** The evidence provided in the Heritage Impact Assessment, Acoustic Report, Design and Access Statement, and proposed drawings supports the proposed development in its entirety. The proposed underfloor heating further demonstrates the sensitive approach to retrofitting the grade II listed building. This aspect of the proposal contributes to the overall balance of benefits that the scheme will deliver in terms of sustainable development and heritage conservation.
- 7.8** It is considered that the proposal represents sustainable development that would make a positive contribution to the historic building and the wider area, and is therefore recommended for approval, subject to the imposition of appropriate conditions. The proposed works will ensure the long-term viability and sustainability of this important heritage asset while respecting its historic character and architectural significance.

8. Conclusions

- 8.1** This Planning Statement has been prepared by HCUK Group on behalf of Kudos Design & Build Ltd to support Full Planning and Listed Building Consent Applications for internal alterations, external works, installation of an air source heat pump (ASHP), underfloor heating, and roof refurbishments at 2 Villas on the Heath, a Grade II listed property in the Hampstead Conservation Area.
- 8.2** The proposed development seeks to sensitively refurbish and upgrade the historic building to enhance its energy efficiency, sustainability, and functionality while preserving its special architectural and historic interest. The key elements of the scheme include internal layout changes, the installation of an ASHP, the replacement of a modern rooflight with a conservation-style rooflight, and various internal refurbishment works to restore period features and details.
- 8.3** The proposal has been carefully assessed against the relevant planning policies at the national, regional, and local levels, including the NPPF, the London Plan 2021, the Camden Local Plan 2017, the emerging Camden Local Plan, and the Hampstead Neighbourhood Plan 2018-2033. The assessment has demonstrated that the proposed works comply with the key policy objectives relating to sustainable development, heritage conservation, design quality, residential amenity, and climate change mitigation.
- 8.4** The proposed development will deliver significant benefits in terms of enhancing the energy efficiency and sustainability of the historic building, reducing its carbon footprint, and improving its resilience to climate change. The sensitive approach to retrofitting the property, which includes a range of measures to improve thermal performance, reduce energy consumption, and maximize the use of low-carbon technologies, is consistent with the objectives of sustainable development set out in the NPPF and the London Plan.
- 8.5** The Heritage Impact Assessment submitted with the application has demonstrated that the proposed works will enhance the heritage significance of the Grade II listed building and will preserve the character and appearance of the Hampstead Conservation Area. The replacement of the modern rooflight, the repair and restoration of period features, and the use of appropriate materials and finishes will

all contribute to the conservation and enhancement of the historic environment, in accordance with Policy D2 of the Camden Local Plan 2017 and Policy HC1 of the London Plan 2021.

8.6 The proposal has also been designed to minimise any potential adverse impacts on the amenity of neighbouring residents, particularly with regard to noise and disturbance from the installation and operation of the ASHP. The use of appropriate mitigation measures, such as acoustic enclosures and vibration isolation, will ensure that the development complies with the relevant policies relating to residential amenity, including Policy D14 of the London Plan 2021 and Policy A1 of the Camden Local Plan 2017.

8.7 The sensitive installation of the underfloor heating system, as outlined in the Heritage Impact Assessment, is another key element of the proposal that demonstrates the applicant's commitment to sustainable development and the conservation of the historic building. This, along with the other proposed works, supports the conclusion that the development represents a high-quality, sustainable, and sensitive approach to retrofitting a historic building in a conservation area.

8.8 In conclusion, the proposal complies with the relevant planning policies at all levels and is consistent with the objectives of sustainable development. On this basis, it is respectfully requested that Full Planning and Listed Building Consent be granted.