Matthew Kitchener Camden Planning Solutions Team

29 July 2024

Re: Planning Reference 2024/2662/P, The Lodge, North End Avenue, NW3 7HP

Dear Mr Kitchener,

The emerging drafts of the Camden Local Plan and the Hampstead Neighbourhood Plan, available to view on the Forum's website, place great emphasis on protecting biodiversity and on sustainability. The Lodge, we note, is located on the fringes of Hampstead Heath, designated Metropolitan Open Land.

The emerging Neighbourhood Plan Policy DH3 supports net zero carbon development and expects all development to meet the highest environmental standards, while preserving the significance of any heritage asset. The revised Plan expects development to prioritise sustainable design and materials and, where possible, increase permeable surface areas. It further states that applicants should slow water run-off, using a sustainable drainage system where appropriate, such as attenuation tanks. We did not see this addressed in the proposal.

The draft Local Plan Policy CC1, requires, among other provisions, that development is designed to be net zero carbon in operation and "enhances and protects existing green spaces, water sources enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure."

The D&A Statement lists some sustainable construction measures such as draught proofing, low energy lighting, insulation and external shading but does not address what action they have taken to reduce the embodied carbon in the development, as outlined in Policy CC4 of the emerging Local Plan.

NE1 of the draft new Hampstead Plan supports development that provides a minimum of 10% Biodiversity Net Gain and lists measures that can be taken to improve biodiversity, which we would want to see in any new development.

The D&A Statement states that the extension would be constructed on a largely paved area, but this paved area has the potential of supporting biodiversity whereas the extension, as proposed, does not.

Unless these measures are addressed, the Forum cannot support this application.

Sincerely,

Alex Nicoll, Chair