



**28 REDINGTON ROAD**

**LONDON BOROUGH OF  
CAMDEN**

**PLANNING STATEMENT**

**DECEMBER 2019**

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APPENDIX 1: CAMDEN PRE-APPLICATION RESPONSE

## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Montagu Evans LLP on behalf of our client to accompany the application for planning permission submitted for the alteration and extension of 28 Redington Road, NW3 7RB.
- 1.2 The proposal has been developed in accordance with national, regional and local planning policy and designed to take account of the surrounding urban context, townscape and heritage assets.
- 1.3 This application has been designed in response to the pre-application advice given by the Camden Council. The discussions have been ongoing throughout the development of the proposals and up until the submission of this application.
- 1.4 The description of development for this application is as follows:

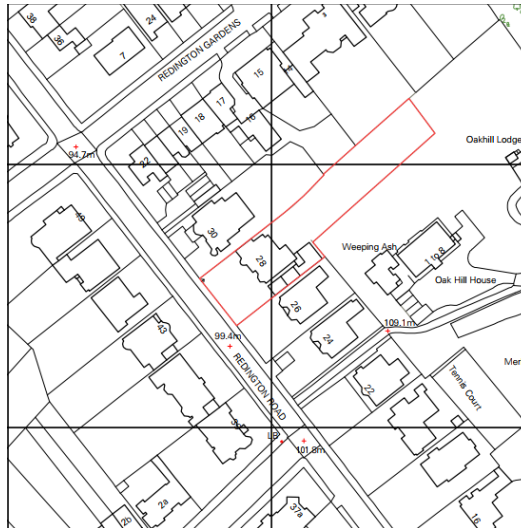
*"Alterations to 28 Redington Road including replacement extensions at lower ground floor and ground floor, removal and replacement of existing two storey side extension lowering of the lower ground floor, removal of internal floors and walls and external landscaping."*

- 1.5 A detailed description of the proposals is set out in Section 3.
- 1.6 The Planning Statement forms part of a suite of documents which have been submitted to inform this application. The supporting documents provided with this application are in accordance with Camden Council's validation requirements and following discussions with planning officers:

- Application Form and Certificates, duly signed and dated;
- CIL Additional Information Form, prepared by Montagu Evans;
- Red Line Site Location Plan, prepared by Thomas Croft Architects;
- Application Drawings, prepared by Thomas Croft Architects ;
- Design and Access Statement, prepared by Thomas Croft Architects;
- Planning Statement, prepared by Montagu Evans;
- Heritage Statement, prepared by Montagu Evans;
- Arboricultural Survey prepared by Boward Tree Management;
- Landscape Concept Report prepared by Jinny Blom;
- Flood Risk and SuDs Assessment by Geosmart;
- Energy Report prepared by Syntegra;
- Basement Impact Assessment prepared by Syntegra;
- Daylight, Sunlight and Overshadowing Report prepared by Syntegra; and
- Bat Report prepared by Greengage.

## 2.0 APPLICATION SITE

- 2.1 28 Redington Road ("the Site" / "the Application") is located within the administrative boundary of the London Borough of Camden ("LBC"). A location plan showing the Site in the context of the surrounding area is provided in Figure 1 below:



**Figure 1:** Site Location Plan

- 2.2 The site is located on the east side of Redington Road, approximately 1km northwest of Hampstead Underground Station.
- 2.3 The site is unlisted and located within the Redington and Frognal Conservation Area.
- 2.4 The site comprises a single substantial house and adjoining motor house (circa 950 sqm in total). The house is arranged over four floors with a single kitchen, a number of reception rooms, 16 bedrooms and 6 bathrooms. The house has a very large rear garden extending a considerable distance from the rear of the property.
- 2.5 The site lies within an archaeological priority area.
- 2.6 The site is identified as being at a low risk of flooding.

### **3.0 PLANNING HISTORY**

- 3.1 We have reviewed the planning history for the property which is available on the Council's website and set out the relevant applications below:
- 3.2 On 4 December 1969 Camden Council refused planning permission (ref: 7793) for the Change of Use of 28 Redington Road from a single family residence to use as a Mission Hostel.
- 3.3 On 3 January 2017 an application (ref: 2016/2997/P) was submitted for the erection of 4 storey plus basement building (with accommodation at 4th floor level within the roof) to provide 8 flats (1 x 1 bed, 5 x 2 bed, 1 x 3 bed and 1 x 4 bed) including front balcony and rear roof terraces, hard and soft landscaping and 7 basement car parking spaces with car lift, following demolition of the existing building (Class C3). The applicant (Linton Group) appealed on the basis of non-determination. The appeal was dismissed on 16 November 2017.
- 3.4 On 18 October 2019 Camden Council issued a certificate of lawfulness (2019/4090/P) confirming that the lawful use of the property is as a C3 single dwellinghouse and that no material change of use occurred during the occupation of the property by the Columban Fathers.

#### 4.0 PRE APPLICATION DISCUSSIONS

- 4.1 This application has been subject to pre-application consultation with LBC planning and design officers. Details of these pre application discussions are outlined below.
- 4.2 A pre-application meeting took place with David Peres Da Costa from Camden Council. Pre-application advice was received on 16<sup>th</sup> May 2019 and this advice has informed and shaped the scheme for which planning permission is sought.
- 4.3 The pre-application advice from the Council was positive and the principle of the development was supported. Notwithstanding this, the officer raised the following issues and the design team's response to the comments are summarised below:

Officer comment	Response
The Council question that the lawful use of the property is C3 residential.	<p>To clarify this matter a certificate of lawful use was submitted to the council and on 18 October 2019 the Council agreed the lawful use of the building is as a single dwellinghouse (i.e. C3 residential).</p> <p>Thus the application does not seek a change of use and applies only for alterations to the existing dwelling house.</p>
The north westerly extension dates from 1914 but has been heavily modified. The removal of this extension and replacement with a more sympathetic extension as proposed would be supported.	<p>Noted – we welcome that this aspect is acknowledged as an enhancement</p>
The existing south easterly extension is a 1914 domestic garage/motor house with accommodation above, which aside from some minor modifications, retains its historic and architectural character and makes a positive contribution to the character and appearance of the conservation area. Its	<p>The scheme has been revised in order to retain the garage and its demolition is no longer proposed, notwithstanding that the demolition of the garage (attached to the house) would be an alteration of the property permissible under permitted development rights.</p>

<p>demolition would not be supported. The existing motor house is clearly separate from the main house. The proposed new extension removes this separation, joining the two buildings and would result in the structure reading as a side extension, rather than as a separate structure. This would undermine the legibility of the motor house and its original function, which is important in showing the historic evolution of the host building and that of the wider conservation area</p>	<p>The main house and motor house are currently clearly connected as existing and no separation exists between the buildings currently. As such, we do not consider the proposals alter the relationship between the two structures materially.</p> <p>This matter is discussed at length in the Heritage Statement.</p>
<p>The strong asymmetry to the existing gables and the prominent chimneystack protruding from the lower gable are a central component of the Arts and Crafts vernacular of the house. Any extension to the building should retain the form of the host building and read as an addition to it. The increase in height also results in the distinct and prominent chimney being truncated which would not be supported.</p>	<p>The revised design emphasises the asymmetry of the roof gables. This matter is discussed at length in the Heritage Statement.</p> <p>We note also that the building is not listed and the rear elevation cannot be seen from the Conservation Area. As a consequence the rear of the house makes no contribution to the conservation area. The positive contribution made by the house is limited to aspects of the front elevation and so the alterations to the rear do not have any effect on the conservation area (they at least 'preserve' it consistent with the duty under S72 of the 1999 TCP (LB+CA) Act.</p> <p>Furthermore the effect of the development must be considered as a whole, especially as the alterations to the front elevation plainly enhance the part of the dwelling that makes the most significant contribution to the conservation area.</p>



	In relation to the chimney, the property benefits from permitted development rights to remove the chimney.
The removal of the existing unsightly railings at roof level is supported. Careful consideration will need to be given to the appearance of the screening, which should be as simple and unobtrusive as possible.	Noted. A lightweight glass balustrade is proposed.
The relocation of the front and porch is very minor and would not affect the proportions of the façade of the host building.	Noted.
There are no objections to the high level windows, subject to detailing.	Noted
No objections in principle to lowering the lower ground floor level. However the external manifestations should be sensitive to the host building. The lightwells should not be surrounded by low walls and a less obtrusive solution (for example grilles) should be proposed.	Noted. No lightwells are proposed as part of the development.
Reinstatement of boundary treatments The existing front boundary wall is in poor condition. The predominant character of the street is of low red brick walls with planting behind. Drawings would be needed before further comment could be provided.	A full landscape statement has been prepared in support of the application. The landscaping represents an enhancement to the property.
Further detail of the installation of external plant such as condensers is required.	No external plant is proposed as part of the development.
The level of excavation required appears to be approximately 0.25 as such a Basement Impact Assessment should be submitted.	The level of excavation is 0.5m. A Basement Impact assessment has been included in the application submission.
Active cooling (air conditioning) will only be permitted where required. If it is needed, an acoustic report would be required.	No active cooling is proposed as part of the development.

An affordable housing/ CIL payment may be required if the lawful use is not C3.	See above. A certificate of lawfulness granted in October 2019 confirms the use of the building is C3 residential as such an affordable housing contribution is not required.
As the building is being converted into a single family dwellinghouse, this would be considered a change of use requiring planning permission. As such, the Council would require the proposed single family dwelling to be car free.	As above. As no change of use is proposed, the parking arrangement that serve the existing dwelling will be retained.
As stated in the Local Plan Policy T1, the Council will expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan.	Notwithstanding that this policy does not apply to alterations to an existing dwelling, cycle parking will be accommodated in a secure covered location.
All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations. This can be demonstrated through an energy statement or sustainability statement. The Council expects all developments to be designed to be water efficient by minimising water use and maximising the re-use of water.	An energy report has been prepared in support of the application and demonstrates that sufficient CO2 reductions have been achieved through energy reduction measures and renewable energy including the use of ground source heat pumps and PV panels.

- 4.4 A copy of the pre-application written response is included in **Appendix 1** of this accompanying Planning Statement.
- 4.5 This application has responded positively to the comments raised in the pre-application process and the proposals and documents submitted have been revised where appropriate in order to take account of the Officer's comments.

## 5.0 THE PROPOSED DEVELOPMENT

- 5.1 This section provides a summary of the development proposals. The description of the proposed development is as follows:

*"Alterations to 28 Redington Road including replacement extensions at lower ground floor and ground floor, removal and replacement of existing two storey side extension lowering of the lower ground floor, removal of internal floors and walls and external landscaping."*

- 5.2 The works will involve alterations to the existing configuration of the building to the side, front and rear. In summary, the works:

- The relocation of the porch and front door;
- Demolition of flat roof extension to the northwest of the property;
- Demolition of the rear later additions and replacement with a new extension;
- Lowering of the lower ground by floor by 500mm and minor extensions;
- Removal of internal walls and floors;
- Extensions and alterations to the roof form; and
- Alterations to the rear fenestration.

- 5.3 For further design details please see the Design & Access Statement and drawings prepared by Thomas Croft Architects which have been submitted in the suite of documents that supports this application.

## 6.0 PLANNING POLICY FRAMEWORK AND STATUTORY PROVISION

- 6.1 The Application has evolved in accordance with adopted and emerging development plan policies, and other relevant guidance. This section provides a summary of the planning context and Section 7 provides an assessment of the application against the policies and guidance contained within these documents.

### National Guidance

- 6.2 At the national level, the revised National Planning Policy Framework (the "NPPF") was published in February 2019, setting out the Government's approach to planning matters, and is a material consideration in the determination of planning applications. This is supported by the National Planning Practice Guidance (NPPG), which provides further guidance on key planning matters.
- 6.3 At the heart of the NPPF there is a presumption in favour of sustainable development (paragraphs 10 and 11). For decision-taking (section 2 of paragraph 11), this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay; or*  
*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:*  
*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*  
*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

- 6.4 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development, and paragraph 12 confirms that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.
- 6.5 Paragraph 189 requires 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"*

6.6 Paragraph 196 states:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

### **Statutory Framework and the Development Plan**

6.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the Statutory Development Plan, unless other material considerations indicate otherwise.

6.8 Section 72 of the Planning (Listed Buildings and Conservation Areas) 1990 Act requires that, in the exercise of planning functions with respect to buildings and land within a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

6.9 For the purposes of determining this application, the development plan comprises :

- London Plan (March 2016) – The Spatial Development Strategy for London Consolidated with Alterations since 2011 (the "London Plan");
- Camden's Local Plan (July 2017);
- Camden's Policies Map;

6.10 The Site falls entirely within the designated Redington and Frognal Conservation Area as defined by the Policies Map. Considerable importance and weight attaches to the conservation of these assets in the decision making process, and the judgment in respect of the duty is taken on the end state of the development.

### **Supporting Planning Guidance**

6.11 The adopted development plan is supported by Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) at the regional and local level.

6.12 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:

- Housing (2016);
- Sustainable Design and Construction (2014);

6.13 At the local level, Camden Council has a number of adopted supplementary planning policy documents which are material considerations in respect of the Application:

- Basements CPG (March 2018);
- Design CPG (March 2019);
- Air quality CPG (March 2019);
- Trees CPG (March 2019);
- Transport CPG (March 2019);
- Energy efficiency and adaptation CPG – (March 2019); and
- Redington and Frognal Conservation Area Appraisal (2000)

### **Emerging Policy**

#### *Draft London Plan*

6.14 On 1 December 2017, the Mayor produced a Draft London Plan for consultation which ran until 2 March 2018. Once adopted, this version will supersede the 2016 consolidation plan.

6.15 The Draft London Plan is currently a material consideration in planning decisions, and will gain more weight as it moves through the process to adoption. The Examination in Public (EiP) concluded in May 2019 and final adoption of the London Plan is anticipated in Spring 2020.

#### *Draft Redington Frognal Neighbourhood Development Plan*

6.16 On 24 June 2019, the RedFrog Association published a second draft of the Redington Frognal Neighbourhood Plan for consultation which ran until 5 August 2019. The plan is yet to be considered by the Council for adoption.

## **7.0 PLANNING POLICY ASSESSMENT**

- 7.1 This section of the report considers the proposals in the context of adopted planning policy, and other relevant guidance. It summarises the principal considerations, but must be read in conjunction with the more detailed technical reports and specialist commentary submitted as part of this application as a whole.
- 7.2 Section 38 (6) states that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan has been outlined in Section 6.0.
- 7.3 In light of this, we consider the key issues requiring justification and assessment via appropriate policy are:
- Principle of Development;
  - Design and Heritage;
  - Principle of Basement Construction;
  - Arboriculture;
  - Archaeology;
  - Ecology;
  - Sunlight and Daylight; and
  - Energy.

### **Principle of Development**

- 7.4 The principle of development is largely established by the existing use of the site as a single residential dwelling.
- 7.5 As set out above, the Council questioned the lawful use of the property due to its long term occupation by the Colombarian Fathers, a religious mission. On 18 October 2019 Camden Council granted a certificate of lawfulness (2019/4090/P) confirming that the lawful use of the property is as a single dwellinghouse and that no material change of use occurred during the occupation of the property by the Fathers.
- 7.6 The proposals seek to refurbish and restore this heavily altered and neglected property. The proposals will completely remove the poor quality side extension to the west;

replace and reconfigure the existing dated extensions to the rear; extend the living accommodation at roof level; and includes the completely refurbishment of the interior of the property to provide a higher quality of rooms and finishes, improved service and circulation spaces and building services. External alterations are also sought in accordance with the intentions of enhancing the quality of the house and the contribution which it makes to the Redington and Frognal Conservation Area.

7.7 The principle of development was supported throughout the pre-application process with the formal response stating an application would be supported if relevant amendments were made. This has been addressed as set out above.

7.8 We therefore consider the extensions and modifications to 28 Redington Road are acceptable in principle, as they accord with all the requirements set out in Policy.

### **Design and Heritage**

7.9 The National Planning Policy Framework and the Council's policies require opportunities to be taken to enhance the character of Conservation Areas when opportunities arise. This includes the removal of negative elements, and it is considered the development proposals at 28 Redington Road provides an opportunity to enhance the contribution made by the property to the character and appearance of the Redington and Frognal Conservation Area.

7.10 As previously stated, given that Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, requires that, in the exercise of planning functions with respect to buildings and land within a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In light of the aforementioned, we therefore assess the effect of the proposed development at 22 Redington Road on the Redinton/Frognal Conservation Area.

7.11 In accordance with this requirement, a separate Heritage Statement has been prepared by Montagu Evans LLP which seeks to advice on the current contribution 28 Redington Road makes to the character and appearance of the Conservation Area. This assessment takes into account paragraph 192 of the NPPF. The Statement assesses the impact of the proposals on the Conservation Area and the public benefits of the proposals (manifested in the design of the property and enhancements made to the property)

7.12 In summary, the report concludes that the proposed works are complementary in their use, form, materials and detailed design to the character and appearance of the Conservation Area.



- 7.13 The report states that the proposals will clearly enhance the principal elements of the significance of the building, namely, its relationship to the street. Proposals for the rear elevation are designed with sensitivity, respecting the character and areas of significance of the house, and maintaining its sheltered domestic character. No elements of the proposals are considered to cause harm to the Conservation Area.
- 7.14 Accordingly, the proposals are considered to meet the requirements of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the requirements of relevant development plan policies and other material consideration. The proposals are considered to be beneficial in heritage terms, and therefore in accordance with national, regional and local policy.

### **Principle of Basement Construction**

- 7.15 The development proposals have been prepared in accordance with Local Plan Policy A5 which is primarily concerned with basements. The proposed basement has been assessed against each part of Policy A5.
- 7.16 The proposal require a very modest extension of the lower ground floor downwards by 50cm to increase the floor to ceiling height across the lower ground floor. A very minor extension to effectively 'square off' the northwest (rear) corner of the building is also proposed. Notwithstanding, the minor nature of the works a Basement Impact Assessment (BIA) has been prepared to support the application. The BIA demonstrates that the proposals will not harm neighbouring properties or the structural, ground or water conditions in the area as set out in Policy A5.
- 7.17 The minor nature of the works, which seek to improve the floor to ceiling height of the lower ground floor of the building, mean there will be no or very limited external expression of the works at lower ground floor. As such, the proposed basement works will have no impact on the character and amenity of the location area, the architectural character of the building or the significance of the Redington and Froggnal Conservation Area in line with the parts c,d,e of Policy A5.
- 7.18 In addition to the matter above, Policy A5 also states basement development should:
- f. not comprise of more than one storey;
  - g. not be built under an existing basement;
- 7.19 *Response; The proposal include digging down a modest amount to increase the floor to ceiling height of the existing lower ground floor. An additional storey is not proposed.*

- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building;
- m. avoid the loss of garden space or trees of townscape or amenity value.

7.20 *Response: A very minor extension to the north- west corner it proposed to 'square off' the living accommodation but otherwise does not extend beyond the footprint of the building or encroach on the sizable front and rear gardens. The proposal will not result in any loss of garden space or trees of townscape or amenity value.*

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';

7.21 *Response: A BIA has been prepared and set out that the predicted damage category on the Burland Scale would be 0 'negligible'.*

- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;

7.22 *Response: As the proposed works does not extend beyond the existing footprint it will not increase the impermeable area on the site.*

- p. avoid cumulative impacts;

7.23 *Responses: The minor nature of the proposal will not have any greater impact on the surrounding area than the existing house and therefore will not contribute to any potential cumulative impacts.*

- q. do not harm the amenity of neighbours;

7.24 *Response: The minor nature of the proposals ensure they will not harm neighbouring amenity.*

- r. provide satisfactory landscaping, including adequate soil depth;

- 7.25 *Response: a full landscape strategy has been provided a part of the proposal. The proposals do not impact on soil depth.*

s. do not harm the appearance or setting of the property or the established character of the surrounding area;

- 7.26 *Response: The proposal will not have any material impact on the external appearance of the building but the overall package works undertaken as part of the application will benefit the property and the surrounding Conservation Area.*

t. protect important archaeological remains; and

- 7.27 *Response: The minor nature of the works is unlikely to impact on any archaeological remains as digging will not go beyond made-up ground*

u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

- 7.28 *Response: The proposal will not have any impact on the ability for the garden to support trees.*

- 7.29 In conclusion, we consider the works are entirely compliant with Local Plan Policy A5.

### **Daylight and Sunlight**

- 7.30 Local Plan Policy A1 seeks to manage the impact of development and seek to prevent unacceptable harm to amenity. This includes the impact of sunlight, daylight and overshadowing.

- 7.31 A report has been prepared on this matter by Syntegra. It concludes that the surrounding buildings located at 26 and 30 Redington Road will not be adversely affected by the proposed development and all assessed windows and gardens meet the BRE criteria.

- 7.32 Therefore, we consider the development is acceptable in terms of daylight, sunlight and overshadowing impact and complies with policy in this respect.

### **Ecology**

- 7.33 A bat survey has been undertaken in support of the application. The Survey has identified bat roosts at the site, which are suspected to by summer day roosts used by a small number of bats. As the roosts are located in areas that will be directly disturbed

by the proposed works, the Bat Report recommends a number of measure to mitigate impacts on the bat population including:

- Erection of temporary alternative roosting space in bat boxes hung from nearby trees;
- Carefully timed works to avoid disturbance during the most sensitive periods;
- Careful removal of roosting features overseen by a licenced ecologist, with movement of any bats encountered into boxes;
- Supervision and monitoring visits by a licenced bat ecologist during further key stages of work after the removal of the roosting features; and
- Provision of compensatory roosting space in the new development for an areas disturbed/lost.

7.34 The report also recommend the following to ensure foraging and commuting bats are not impacted by proposals:

- No net increase in external lighting and provision of improved landscaping for invertebrate prey;
- Retention of trees, vegetation and habitats of value to local bat populations, where possible; and
- Wildlife-friendly landscaping to enhance the site as a foraging and commuting resource.
- Measures relating to bat mitigation could be secured through planning condition, to be described within a detailed Bat Mitigation Strategy

7.35 Whilst bats are present on the site, appropriate actions can be taken to mitigate the impact on the bat population in accordance with national and local planning policy.

### **Arboriculture**

7.36 An Arboricultural Impact Assessment and associated Method Statement has been prepared by Boward Tree Management and submitted as part of this planning application.

7.37 Policy 7.21 of the London plan (2016) sets out the importance of trees in terms of the natural environment, air quality, adapting to and mitigating climate change and contributing to the quality and character of London's environment. The Policy states that for decision making that:

*"Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'"*

*and that "wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species."*

- 7.38 Local Plan Policy A3 states the Council will seek to protect trees and vegetation with amenity, historic, cultural or ecological value and encourage the provision of additional planting in new developments.
- 7.39 A full landscape statement has been prepared in support of the application and no trees are proposed for removal.

### **Archaeology**

- 7.40 The site is located within an Archaeological Priority Area. Policy D2 seeks to protect archaeological remains in the Borough.
- 7.41 Given the very limited level of excavation proposed (50cm) the proposal will not impact upon any archaeological remains.

### **Energy and climate change**

- 7.42 Policy 5.2 of the London Plan (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy – This involves the use of passive and energy efficiency design measures to reduce the energy requirement and subsequent carbon footprint of the site. These provide a footprint which delivers compliance with Building Regulations Part L (2010) and the Baseline Energy and Carbon emission figures for the development.
  - Be Clean: supply energy efficiently – The use of a central energy centre has been considered to serve the development, to provide the primary heating and cooling requirements for the development.
  - Be Green: use renewable energy – The use of renewable energy has been investigated in the context of the site and the overall usage pattern of energy throughout the development.

- 7.43 Camden Local Policy CC1 seeks major residential refurbishments to demonstrate the greatest possible CO2 reductions, in line with the above hierarchy. It also seeks a 20% carbon reduction from renewables.
- 7.44 The application is accompanied by an Energy Statement, prepared by Syntegra.
- 7.45 Through the adoption of energy efficiency measures and the provision of ground source heat pumps and photovoltaic panels the Energy Statement concludes that a total regulated saving of 36.34 tonnes could be achieved. This equates to a 69.7% reduction from the baseline is regulated energy emissions. Of which 20.88% of the saving (4.17 tonnes) will be achieved through the utilisation of renewable energy.
- 7.46 As such, the proposed development accords with regional and local planning policy in respect of energy reduction measures.

## **8.0 SUMMARY AND CONCLUSIONS**

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local authorities to have regard to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 8.3 A full suite of technical studies – outlined in the body of this report – have concluded no detrimental effects on the environment or neighbouring occupiers.
- 8.4 As a whole the proposal comprises sustainable development and is in accordance with the Development Plan. This is a scheme which has been subject to careful consideration, and appears to deliver demonstrable benefits to the way the Site appears and functions.
- 8.5 The alterations to 28 Redington Road are sympathetic and scholarly manner; and would enhance the contribution which the property makes to the Redington and Frognal Conservation Area.
- 8.6 The proposals therefore meet, and are in accordance with the strict design and heritage objectives of the Development Plan and the Framework, which, with reference to statute, gives these benefits considerable importance and weight in the planning process.

## **APPENDICES**

Appendix 1: Camden Council Pre-application Response