Planning Application 2021/3734/P for 30 Ferncroft Avenue

Response by the design team to request for information by Redington Frognal Neighbourhood Forum.

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| **SD1 - REFURBISHMENT OF EXISTING BUILDING STOCK** | |
| **Policy requirement** | **Applicant Response** |
| Redevelopment or extensions to the existing building stock should include consideration all of the following, as appropriate |  |
| i. Development should avoid adverse impacts on biodiversity and wildlife habitat, including through loss of garden space. | The landscape proposal increases the area of planting in the garden in accordance with the attached table.  The total area, excluding pots, is increased by 37% (this includes the green roof on the extension which is planned to have 150mm growing zone).  Refer to landscape plans in appendix D, pages 1, 4. |
| ii. If there is likely to be a significant adverse impact, this should be offset by gains elsewhere within the site, such as tree and hedge planting. | See response above.  The area of lawn is reduced but this is more than compensated for by the increase in planting.  Refer to landscape plans in appendix D, pages 2, 4. |
| iii. The achievement of a net gain in biodiversity is strongly encouraged (4). | The existing garden is, comparatively speaking, species poor.  The proposed garden will have a more diverse range of species due to the increased area and range of planting.  Refer to landscape plans in appendix D, pages 4, 5. |
| iv. Where single houses have been sub-divided into flats, and where units are 20% or more below London Plan private internal space standards, they may be amalgamated to form fewer units, provided the reduction in units is no greater than necessary to meet the standards. This applies to all development of a site since 26 June 2006 (5) , (6) . | Not applicable.  There will be no sub-division of the property. |
| v. The creation of garden development and building extensions should be in accordance Policies SD 2 to SD 5, and maximise the area of soft, natural landscaping, to act as a carbon sink and help mitigate climate change and the urban heat island effect | Refer response at (i) above.  An existing extension is replaced by an extension of similar size, therefore, has little impact on garden area.  We are maximising areas of soft landscape…  Refer landscape plans in appendix D, page 1.  The new extension has a green roof to add to the planted area on site.  Refer appendix C, Architectural drawings, numbers 2003, 2005, and 2008. |
| vi. Front garden boundary walls and hedges, which contribute to the character and appearance of the area, should be preserved or reinstated for new developments and refurbishments of existing building stock. | Existing boundary walls and fences will be retained, with some rebuilding where existing walls are bowed. Hedges are proposed behind fences on the front and East side of garden.  Refer landscape plan in appendix D, page 2. |
| vii. Use of hedges as front, side and rear garden boundaries is encouraged, to enhance amenity, biodiversity and streetscapes. | Hedges are proposed behind fences on the front (South, facing Ferncroft Avenue) and East (facing Hollycroft Avenue) side of garden.  Refer to landscape plan in appendix D, page 1. |
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| **SD2 - REDINGTON FROGNAL CONSERVATION AREA** | |
| **Policy requirement** | **Applicant Response** |
| SD 2 New developments must preserve or enhance the green garden suburb character and appearance of the Conservation Area. This includes retention of buildings or features that contribute to that special interest, including gaps between buildings, trees, hedges and the open garden suburb character created by well-vegetated front, side and rear gardens. | The application is to retain the existing building, replace an existing extension to the rear, and to extend below ground basement accommodation.  The applicant will seek to remove more recent features which are not in character, and replace with features in keeping with the original design.  Refer appendix C, Architectural drawings, numbers 2001,2002,2003, and 2004.  The gardens are designed to be in keeping with the character of the Conservation Area. The tree and shrub species chosen are typical of an early 20th century garden. The total area of planting is more generous than it is at present.  Refer to planting character in appendix D, pages 12-15. |
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| **SD3 - ELECTRIC VEHICLE CHARGING POINTS** | |
| **Policy requirement** | **Applicant Response** |
| The provision of charging points for electric vehicles for proposed and existing parking places is encouraged. | The site has two car parking spaces and a two car garage within the curtilage of the site.  The applicant will provide 2 car charging points inside the site.  The parking on the road outside of the site is not in the applicants control. However, the applicant will offer to provide 2 changing points at roadside to be adopted by the Local Authority. |
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| **SD4 - REDINGTON FROGNAL CHARACTER** | |
| **Policy requirement** | **Applicant Response** |
| Development, including redevelopment, should complement the distinctive character of the Redington Frognal area and the immediate site context. This includes consideration of all of the following, as appropriate: | A Heritage Statement has been provided in the application at appendix H  It notes the asset may not be listed, but is part of Quennell/Hart legacy. Page 10.  On that basis it is acknowledged that the property has an architectural quality, and that works proposed will be sensitive to the design of the existing house.  The statement concludes that ‘The proposed works will not result in any significant harm to the Historic Built Environment’. Page 17. |
| i. The scale, massing and height of development should complement the established characteristics of the area, responding to the prevailing 2-4 storey building height. | The massing and height of the existing building will be retained, therefore will not breach this requirement. |
| ii. Mid-rise development of up to six storeys for sites fronting Finchley Road, between Frognal and Frognal Lane; up to four to five storeys between Frognal Lane and Platt’s Lane and two to four storeys north of Platt’s Lane, where the prevailing building heights are much lower, may be appropriate. | No height increase is proposed. |
| iii. Development should cause no significant detriment through loss of light or increased shading to neighbouring properties and gardens. | The proposals will not cause loss of light or increased shading.  Refer D+A statement for right to light assessment, page 16. |
| iv. The degree of setback from the street, and resulting sense of enclosure of street frontages created by built development, should reinforce the established townscape character. | No change to setbacks proposed. |
| v. The plot coverage ratio of buildings to open space should respond to the existing character of the area, including provision of extensive garden areas. | The footprint of the building at ground floor level would increase from 211.5m2 to 226m2, an increase of 14.5m2 in a site of 865m2, therefore the ratio of open space does not change significantly.  A green roof is proposed over the new extension, providing additional planted area.  Refer appendix C, Architectural drawing number 2003.  Refer D&A Statement page 13. |
| vi. Garden space should be provided to reinforce the established pattern of front and rear garden spaces around the site. | The established pattern of front and rear garden is being retained.  The front garden, by adding heavy planting in pots and climbers on the front terrace is made softer and more in keeping with the character of the Conservation Area than the existing arrangement which is very hard and unattractive.  Refer to landscape plan in appendix D, page 1. |
| vii. The area of soft natural garden space within the site should be maintained or increased. | The overall area of paving is slightly increased but this should be seen in the context of a garden which has very little hard surface at present.  The quantity of hard paving as proposed is still modest for a garden of this scale. But it will make the garden more useful for owner’s home working as an artist. The quantity of planting is significantly increased. (by 37% when including the green roof on the extension).  Refer to landscape plan in appendix D, page 1. |
| viii. Landscaping should be an integral part of the design and layout of development and should include trees and other planting using species with a high value to biodiversity, as set out in section 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character. | The planting will contain a wide variety of plants that have value for wildlife both as food plants, pollinators and breeding habitat.  We will include some native species including Primula vulgaris, Ajuga reptans, Stachys officinalis, Gallium odoratum, Narcissus pseudonarcissus, Galanthus nivalis, Euonymus europaeus.  Refer to planting plan in appendix D, page 5, and within this form under BGI1 answer to item iii. |
| ix. The spacing of houses should allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. A minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this will be appropriate in the spacing of new development. | There are no new houses, or change in relationship between houses, proposed. |
| x. Where traditional materials are used in new buildings, they should be authentic traditional materials and reflect the palette of materials in the surrounding area and not comprise synthetic materials, such as uPVC or materials with an imprinted or applied surface to imitate traditional materials. Where modern materials are used, they should be durable, with a high standard of finish. | Authentic materials are to be used for new construction elements, to include leadwork, painted timber window frames, vertical clay roof tiles to match existing elsewhere on the property.  Refer architectural drawings and D+A statement. Pages 14 & 15. |
| xi. Development should provide active frontages (with doors and windows) to streets and spaces, including at ground floor level, so as to provide overlooking and surveillance. | No change is proposed to existing access and egress arrangements.  The property will remain a single residence. |
| xii. Development that incorporates eaves and spaces for internal bat roosts, and the use of bird bricks and other features to support wildlife, will be particularly welcomed. | The existing attic spaces will be examined to explore whether bat roosts could be accommodated. If they cannot the applicant will provide 6 bat boxes within the garden grounds.  There is an unused log storage area behind the garage in a quiet corner that will be adapted to become an attractive wildlife habitat.  Other elements in the garden will be explored to provide enhanced habitats. |
| xiii. Creative, bespoke design solutions will be welcomed, especially where they complement the architectural and townscape quality, variety and diversity of the area and incorporate superior environmental performance. | The new extension will have a green roof to provide additional biodiversity opportunity.  Refer architectural drawings and D+A statement. Pages 21 & drawings 2005 & 2008. |
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| **SD5 - DWELLINGS: EXTENSIONS AND GARDEN DEVELOPMENT** | |
| **Policy requirement** | **Applicant Response** |
| Extensions to existing buildings, including outbuildings and swimming pools, should be designed to complement the character of the original building and context. This includes the consideration of all of the following, as appropriate: |  |
| i. Use either matching materials and roof-form of the existing building, including use of authentic traditional materials, or using contrasting materials, forms and construction, where this would help to maintain the original composition of the building. | The new extension has been designed in traditional materials.  A recess in the plan between original house and extension creates a visual gap between old and new, and allows the original house composition to be distinguished.  This is reinforced by the use of vertical clay roof tiling on the extension elevations.  Refer architectural drawings (side elevation) and D+A statement. Pages 11 and drawings 2004,2703. |
| ii. The massing, scale and set-back of the extension should ensure that it is subordinate to the main building. | The new extension is single storey, and is subservient to the original house. |
| iii. Extension into garden space, including outbuildings, should involve no significant reduction in the overall area of natural soft surface and have no significant adverse impact on the amenity, biodiversity and ecological value within the site. | Extensions do not impact on garden space, except for a skylight in paved terrace to buried basement. The planting of the roof of the extension will provide a greater area of planting and thus pollinator value.  Refer to landscape plan in appendix D, page 1. |
| iv. The spacing of houses including the extension should allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. A minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semidetached or detached houses. Where the established character includes wider gaps, then this will be appropriate in the spacing of new development. | There is no change to the relationship between adjacent houses. |
| v. Recessed porches should not be enclosed, including by glass, where the established character is based on open porches | No new porches proposed. |
| vi. Balconies should not be added to existing frontages where it would harm the amenity of neighbouring properties or would be out of keeping with the established character of the property and surrounding area. | No new balconies proposed. |
| vii. Hedges (front, side and rear) and front boundary walls, which contribute to the character and appearance of the Conservation Area, should be retained. | Boundary walls are retained.  Hedges are to be replanted at a larger size.  Refer to landscape plan in appendix D, page 1. |
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| **SD6 - RETENTION OF ARCHITECTURAL DETAILS IN EXISTING BUILDINGS** | |
| **Policy requirement** | **Applicant Response** |
| Front boundary walls and original architectural details, such as chimneys, windows and porches, which contribute positively to the character and appearance of the area, should be retained. Where such features have been removed previously, their reinstatement is encouraged. | Non original features to be replaced with authentic period design elements.  Including: chimney rebuild, replace upvc window with timber frame, replace timber and corroded balustrades with cast iron.  Refer architectural drawings (elevations) and D+A statement, page 15, .Boundary walls and fences will be retained, with some rebuild of damaged parts.  Hedges, etc.  Boundary walls and fences will be retained, with some reinstatement of damaged parts.  Hedges, etc.  Refer to landscape plan in appendix D, page 1. |
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| **BGI1 – GARDENS AND ECOLOGY** | |
| **Policy requirement** | **Applicant Response** |
| Open/Unbuilt areas within development sites should be designed to enhance their ecological, wildlife and residential amenity values. This includes consideration of all of the following, as appropriate: |  |
| 1. Retaining, providing and reinstating trees, hedgerows and other planting using species, especially those of high value to biodiversity, as set out in 6.2 Planting Guidance to Enhance Biodiversity and Conservation area character. | Any trees and other plants that are being removed are compensated for by replacing with a larger amount of new planting.  Refer to planting plan in appendix D, page 5. |
| 1. Achieving an urban engineering score in excess of the London Plan target. | No reference has been found to ‘urban engineering score’ within either the London Plan or the Neighbourhood Plan. However, the rearrangement of the garden, the increase in both planting area and range of species contributes positively to achieving the REDINGTON FROGNAL NEIGHBOURHOOD PLAN’s objectives 1 and 2. |
| 1. Maximising the area of soft landscaping and using planting with high value to pollinators and insects, as set out in 6.2 Planting Guidance to Enhance Biodiversity and Conservation area character. | Planting area has been increased by 37% throughout the property. The planting proposals adhere to the recommendations of Section 6.2, with a focus upon pollinators:  Trees   * Flowering trees (Cherry, Dogwood) * Birch, ranked highly for their relative importance for supporting insects from the London survey (table 3 in section 6.2.1 of the Neighbourhood plan)   Large shrubs   * Rosa spp. * Ceanothus spp. * Viburnum spp.   Climbers   * Trachelospermum jasminiodes * Clematis alpina   Herbaceous perennials   * Lavendula spp. * Rosmarinus officinalis * Cistus spp.   The above reflect a selection of species found both within the Neighbourhood plan and the garden. However, the species selection for the garden extends from this further to provide a diverse mix of species for pollinators, following guidance on the preference for single flowering species as opposed to doubles, such as in the Rose species selection of ‘Francis E Lester’.  Refer to planting plan in appendix D, page 5. |
| 1. Minimising hard surface areas to those necessary for the functioning of the site, such as footpaths to doors, and ensuring they are permeable to allow drainage of surface water. | Hard surfaces are limited to access paths, terraces, and steps. New terraces are permeable.  Refer to landscape plan in appendix D, page 2. |
| 1. Retaining hedges and walls and taking opportunities to use hedges as boundary treatments, instead of or in addition to walls and fences. | Where any hedges are removed they are replaced by new hedges at a larger size  Refer to planting plan in appendix D, page 5. |
| 1. Where tree removal is unavoidable, such as removal of dead, dying, unsafe trees or invasive species, they should be replaced within the site by a similar or other native species, unless it can be demonstrated to the Council’s satisfaction that this is not possible. | Some trees are removed because they are likely to cause structural damage in the future.  They are being replaced with a larger number of trees.  These are not native but are appropriate to the character of the conservation area and are suited to increased temperature and decreased moisture associated with climate change.  Refer to landscape plans in appendix D, pages 4, 5. |
| 1. The inclusion of new water features, such as natural wildlife ponds. | There is no new water feature proposed.  Refer landscape plan in appendix D, page 1. |
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| **BGI2 – TREE PLANT**ING AND PRESERVATION | |
| **Policy requirement** | **Applicant Response** |
| i. Trees should be retained and incorporated in any development. Where felling is required, on grounds of safety or because it is an invasive species, supported by a suitably qualified expert, one or more trees should be planted in replacement, unless it can be demonstrated to the Council's satisfaction that replacement planting is not appropriate. | Refer Arboricultural Report, page 17 para.  6.1.1: low-quality maple and moderate-quality  willow will be removed; the latter too close to the boundary wall, which has impacted on stability of the wall. |
| ii. For redevelopment, landscaping proposals should include tree planting, with species selected on the basis of local character, high biodiversity value and / or high value to insects. | Refer to planting plan in appendix D, page 5. |
| iii. Development should protect trees that are important to biodiversity, rear garden tree corridors, local character and / or the Conservation Area. | Refer to planting plan in appendix D, page 5. |
| iv. Development should seek opportunities to create, strengthen and restore tree lines and biodiversity corridors, reducing the incidents of breaks and the length of gaps. | Refer to planting plan in appendix D, pages 5. |
| v. Veteran trees must be fully protected during construction. The required minimum buffer zone for veteran trees is 15 times larger than the stem diameter of a veteran tree when measured 1.5 metres above ground level, or 5m from the edge of its canopy, if that’s greater. Deadwood is to be retained where possible. Canopy reduction will only be acceptable if the root system of a large maturing tree has substantial decay, making it potentially hazardous, or if it is proven to be causing subsidence. The tree root protection zone radius required for non-veteran trees is 12 times the stem diameter measured at breast height and capped at a radius of 15 metres. | Refer Arboricultural Report, which records that there are no veteran trees on site. |
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| **BGI3 - LIGHTING** | |
| **Policy requirement** | **Applicant Response** |
| External lighting within development sites should have no significant impact on wildlife or local amenity. This means: |  |
| i. avoiding short wavelength (cool white / blue spectrum) lighting | External lighting has not been designed, however the applicant will accept a planning condition to avoid short wavelength lighting. |
| ii. avoiding large expanses of glazing at the rear of properties, such as conservatories at first-floor level and above and glazed summerhouses sited in rear garden tree corridors; | There are no large expanses of glazing, no conservatories at first floor, and no glazed summerhouses in the project.  Refer architectural drawings (elevations) and D+A statement for glazing to extension. Pages 11. |
| iii. providing focused lighting and avoiding wide or dispersed floodlighting and iv. avoiding lighting of trees, hedges and other areas of high potential for biodiversity. | External lighting has not been designed, however the applicant will accept a planning condition to comply with this requirement.  Eg:  External lighting will be provided to the external hard landscaped areas only, sufficient for safety and to allow the gardens to be enjoyed.  Lighting will generally not be focused on trees and hedges, such lighting which may illuminate soft landscaping to be on timers set to switch off at say 11pm. |
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| **BGI4 – LOCAL GREEN SPACES** | |
| **Policy requirement** | **Applicant Response** |
| The following spaces are designated as Local Green Spaces: | Not applicable.  The application property does not form part of, or is adjacent to, the designated Local Green Spaces.  The gardens are designed to be attractive to wildlife and to contribute generally to the habitability for wildlife in the area. |
| LGS 1: West Heath Lawn Tennis Club |  |
| LGS 2: SINC CaL07 Frognal Lane Gardens |  |
| LGS 3: Embankment between Platt’s Lane and Telegraph Hill |  |
| LGS 4: Green Space at Studholme Court |  |
| LGS 5: Rear garden at Camden Arts Centre |  |
| LGS 6: Hampstead Manor Gardens |  |
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| **UD1 – UNDERGROUND DEVELOPMENT** | |
| **Policy requirement** | **Applicant Response** |
| i. Residential basements and other underground development, including car parking and swimming pools, should have no significant adverse impact on: |  |
| 1. the viability of garden spaces. This requires maintaining 3 metres of depth for roots of large trees and 2 metres of depth for roots of medium trees. Large and medium trees are defined as:   • large trees (ultimate height of 15m+): a minimum of 30 m3  • medium trees (ultimate height of 8 -15m): a minimum of 20 m3 | The proposed basement is in large part under the existing house, and where the basement extends under the garden area, these areas are set aside as terraces for the owner to enjoy the outdoors.  The proposed planting scheme includes new trees and shrubs.  Refer Arboricultural Report, page 10, there are  no large trees on site; there is some limited  rooting from large off-site trees onto site.  Refer Landscape design pages 1, 5. |
| b. the character and verdant amenity of garden spaces, including through the impact of light wells, car lifts and other surface features. | There is no other surface feature of the basement other than terraces in garden space. Refer to landscape plan in appendix D, pages 1. |
| c. the viability of trees with ecological or amenity value and potential for future tree planting. This requires maintaining 3-metres of depth for roots of large trees and 2-metres of depth for roots of medium trees. | The project proposes a fully planted garden scheme, with sufficient depth for the proposed species.  All proposed trees are outside the extent of basement.  Refer to planting plan and character in appendix D, pages 1, 5, 12-15. |
| d. underground streams or spring lines, including through cumulative impact. | Local underground rivers are culverted;  therefore, no interaction is possible. There will be minimal impact on groundwater flows due to the property already having a lower ground floor level.  therefore, no interaction is possible. There will be minimal impact on groundwater flows due to property  Soil type is predominantly cohesive; therefore,  damming is considered low risk. Refer Mint  Structures Structural Engineer’s report for  further information on pages 9-12.  Refer to GEA Basement Impact Assessment  (BIA) Report Section 2.2 page 6, Section 2.5  pages 8 &amp; 9 and Section 3 pages 11 to 14. The report has identified known spring lines and existing and former flow paths of rivers and  streams. An intrusive investigation has also  been undertaken to establish the ground  conditions, including the presence of  groundwater. |
| e. neighbouring properties, though impacts, and cumulative impacts, on ground water and land stability. | Providing the works are carried out following an engineer-designed, logical, and well-managed sequencing plan, the risk of neighbouring properties is considered low. Temporary works are required to manage deep excavations, and groundwater management will be used, if necessary, in the form of sump pumping.  Refer to Structural Engineers report pages 9-16 / 17-18 / drawings M20202/B1–B6 for further  information.  Refer to GEA Basement Impact Assessment  (BIA) Report Section 2.2 page 6, Section 2.5  pages 8 &amp; 9 and Section 3 pages 11 to 14. The report has identified known spring lines and existing and former flow paths of rivers and  streams. An intrusive investigation has also  been undertaken to establish the ground  conditions, including the presence of  groundwater. |
| ii. Development proposals that include new water features to manage drainage, including daylighting of underground rivers, will be encouraged. | There are no water features proposed on the site, or underground streams.  Surface Water attenuation is the only viable option. Refer proposed SuDS scheme below. |
| iii. Development proposals should be accompanied by sufficient information to allow proper assessment of impacts, including how they: a. will not cause cumulative erosion of garden space; and b. will not contribute to localised groundwater flooding. | Suggested Mint Structures SuDs scheme  produced to address impact of works and  recommend measures to improve outflow from  site limiting risk of erosion and flooding. Pages  5-9 &amp; 29-38. |
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| UD2 - DEVELOPMENT IMPACTS | |
| **Policy requirement** | **Applicant Response** |
| i. High impact activities will be restricted to 9 am till 5.30 pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays. High impact activities include: | Restrictions on working times are noted on the D+A statement, page 20.  It is anticipated that a planning condition is applied to enforce this policy.  The applicant will comply with these requirements. |
| a. Demolition, ground-breaking and excavation works using percussive equipment. | Refer response at (i) above. |
| b. Percussive piling operations and percussive pile reduction and pile break-out works. | Refer response at (i) above. |
| c. Percussive and grinding power tools on party walls/floors of adjoining occupied properties. | Refer response at (i) above. |
| d. Removal of clay and sub soil during excavation by means of conveyor belts, lorries, etc. | Refer response at (i) above. |
| ii. Deliveries and collections involving these activities should take place between 9.30 am and 4.30 pm. | Refer response at (i) above. |
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| UD1 – BASEMENT IMPACT ASSESSMENTS 4.28 | |
| **Policy requirement** | **Applicant Response** |
| It will be helpful to demonstrate compliance with policy UD 1 through the steps set out under headings: | A full Basement Impact Assessment has been submitted by the applicant. This will be assessed by the Council’s specialist consultant.  Refer appendix I, Geotechnical and Basement Impact Assessment.  Refer appendix K, Structural Engineers Report.  Refer appendix L, SUDS Report. |
| 4.28.1 Screening and Information to Accompany Planning Applications, | Refer Mint Structures Structural Engineer’s  report page 6-13  Refer to GEA BIA Report Sections 3 and 4 on  pages 11 to 14.  A full screening and scoping exercise has been undertaken in accordance awith the Camden guidance CPG Basements. |
| 4.28.2 Basement Impact Assessment Guidance. | Refer Mint Structures Structural Engineer’s  report page 14-23  Refer to GEA BIA Report as a whole, which  follows the Camden BIA guidance and  therefore takes full account of the guidance  issued in the Redington Frognal Neighbourhood  Plan. |
| 4.28.3 Basement Impact Assessments. | Refer Mint Structures Structural Engineer’s report page 14-23  Refer to GEA BIA Report as whole. As stated  previously, the BIA report follows the Camden  guidance, which also covers the elements  requested in the Redington Frognal  Neighbourhood Plan. |
| However, not all of this guidance will be relevant for every application for underground development. |  |