Planning Statement 61 Redington Road

Relating to site at 61 Redington Road, London, NW3 7RP May 2022



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1.0 Introduction

- 1.1 This Planning Statement has been prepared by high Consulting on behalf of the owners of the property, Mr and Mrs Burns. It accompanies a full planning application for the amalgamation, refurbishment and extension of the property at No.61 Redington Road, London NW3 7RP ("the site"), within the London Borough of Camden ("LB Camden").
- 1.2 The description of development for the proposed scheme is:
 - "Amalgamation of three units into two units and works comprising partial demolition and the erection of a rear extension at the lower ground, ground and first floors, together with excavation to the lower ground floor, alterations to the roof and other associated works"
- 1.3 The submitted proposal seeks to convert the three existing residential units into one family dwelling and a one-bedroom flat at lower ground level. This will involve an excavation and extension of the existing lower ground, and rear extensions at ground, first and second floors to enhance the appearance of the rear elevation and to gain additional habitable space.
- 1.4 The aim of the proposal is to deliver two residential units of exceptional standard in terms of function, energy efficiency and historic conservation. The sensitive approach adopted in the proposed development will ensure that it continues to sustain a neutral to positive contribution to the character and appearance of the Redington/Frognal Conservation Area and to the settings of other nearby heritage assets whilst creating contemporary living accommodation for the future residents.
- 1.5 This statement should be read in conjunction with supporting plans and documents, including:
 - Planning application form and CIL form;
 - Existing and Proposed Architectural Plans and Drawings;
 - Design and Access Statement;
 - Heritage Statement;
 - Arboriculture Impact Assessment and Tree Survey;
 - Ground Investigation Report and Basement Impact Assessment;
 - Structural Report and Basement Impact Assessment;
 - Surface Flow and Flooding Basement Impact Assessment;
 - Outline Construction Management Plan (pro forma);
 - Noise Assessment;
 - Ecological Assessment;
 - Air Quality Assessment;
 - Energy and Sustainability Statement, including an Overheating Assessment;
 - Proposed Scheme Daylight and Sunlight Assessment; and
 - Daylight, Sunlight and Overshadowing Assessment.
- 1.6 This statement provides a detailed assessment of the proposal in relation to planning policy and other material planning considerations. It provides a reasoned justification as to why planning permission for the proposed development should be granted.



2.0 Site and Surroundings

- 2.1 No. 61 Redington Road comprises a detached two-storey property, with additional floorspace in the roof and lower ground floor, located on the eastern side of Redington Road. The property is split into three residential units, with one flat occupying the lower ground and ground levels, one flat occupying the first floor and one flat occupying the second-floor level.
- 2.2 At the front there are two entrance doors. There is a gravel forecourt at the frontage of the property and a driveway to the south which leads to a double garage. To the rear is an expansive garden with a small patio area to the south of the property. A site location plan is shown in Figure 1.

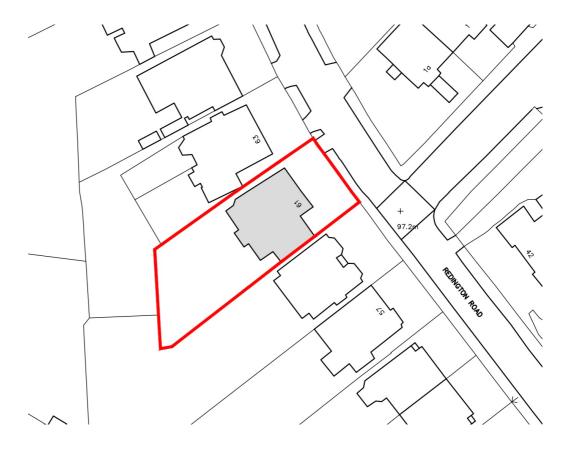


Figure 1: Site Location Plan

2.3 The site is not listed; however, it is located within the Redington/Frognal Conservation Area. The subject property and the majority of the properties on Redington Road are primarily 20th century constructs, which are characteristically different in terms of their architectural styles and features. Photographs of the front and rear elevations at No.61 Redington Road are provided at Figure 2 below.

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Figure 2: Photograph of the front (top) and rear (bottom) elevation at No.61 Redington Road, NW3



- 2.4 The Redington/Frognal Conservation Area Statement identifies Nos.5-95 (odd) Redington Road, which includes the subject property, as a group of buildings that make a "positive contribution" to the Conservation Area. There are no locally listed buildings nearby and the nearest statutorily listed buildings are Nos. 54 and 56 Redington Road, which comprise two detached houses (Grade II listed) to the north of the site.
- 2.5 Although 61 Redington Road is recognised as a "positive contributor" to the Conservation Area, its architectural interest has been degraded over time as a result of various alterations to the building's interior and exterior, particularly at the rear. The Arts and Crafts style rear elevation has retained its historic character, however, it is somewhat architecturally disjointed and uncomfortable in its appearance due to the changes that have been made to it. It is apparent that a number of properties on Redington Road have also been altered and extended in recent years resulting in a varied townscape context. For example, the rear elevations of the houses immediately north of the site have an Arts and Crafts idiom, whereas the adjacent house to the south has a modern idiom.
- 2.6 The site has a Public Transport Accessibility Level (PTAL) rating of 0 (where 0 is worst and 6b is best). However, the site lies within walking distance (0.5 miles approx.) of Hampstead Tube Station, which is served by the Northern line (Edgware branch). Finchley and Frognal Overground Station and West Hampstead also lie within walking distance of the site.
- 2.7 In terms of the surrounding area, Redington Road and the streets in the immediate vicinity are characterised by large, detached and semi-detached dwellings. The site benefits from good access to shops, services and local amenities due to its close proximity to Finchley Road. It also has good access to local green space in the form of Hampstead Heath and Golders Hill Park.

Planning Designations

- 2.8 As noted above and as shown on the Policies Map extract below, the site falls within the Redington and Frognal Conservation Area. The site has no other designations on the Policies Map.
- 2.9 The site is located in flood zone 1 ("low risk") as identified on the Environment Agency's Flood Map for Planning.





Figure 3: Local Plan Policies Map Extract (subject site indicated by the red circle)



3.0 Planning History and Consultation

Planning History

3.1 The site has a limited planning history with most of the decisions pre-dating 1990, as tabled below.

Reference	Proposal	Status	Decision Date
TPD756/295	Conversion of No. 61 Redington Road, N.W.3. into a self-contained maisonette on ground and first floors and one self-contained flat each in the basement and second floor.	Granted	10 July 1962
CTP/E5/2/18/34594	Change of use and works of conversion to form a self-contained flat on part of the first floor.	Granted	27 Sept 1982
8803513	Alterations and extensions including elevational changes at the rear the formation of a new entrance door at front ground floor level and the erection of a ground floor side extension in connection with the refurbishment of three existing dwelling units as shown on drawings No.353/1a 5a 6a 7a 8a and 9a.	Granted	16 March 1988
8905141	Erection of a lean-to greenhouse at the rear of No.61 Redington Road as shown on two unnumbered sketches and annotated photograph.	Granted	23 Aug 1989

Neighbour consultation

- 3.2 The applicant has engaged in a public consultation exercise with their immediate neighbours (No.59 and No.63 (Flats A-E) and No.52 Redington Road) as they are likely to be most affected by the proposed scheme. The key topics that were discussed with the neighbours were the design and appearance of the scheme, the extent of the works and the eventual construction.
- 3.3 In short, it is understood that the consultation was productive and that the neighbours raised no material planning concerns with regards to the scheme. The principle of the development (the amalgamation of 3 units into 2 units) and the proposed renovation, refurbishment and overall design approach were generally well received and supported by the neighbours.



4.0 Proposed Development

- 4.1 The application seeks permission for:
 - "Amalgamation of three units into two units and works comprising partial demolition and the erection of a rear extension at the lower ground, ground and first floors, together with excavation to the lower ground floor, alterations to the roof and other associated works"
- 4.2 The proposal includes the conversion, refurbishment and extension of the building to create one family dwelling and a 1-bedroom unit occupying the 'front' lower ground floor. Further details of the proposed dwellings can be found in the supporting Design and Access Statement.
- 4.3 Both dwellings have independent entrances and comfortably exceed the national minimum floorspace standards. Each dwelling also has dedicated private external amenity space. The main family dwelling has the benefit of a large rear garden and the lower ground floor flat has access to the two front lightwells as well as a dedicated area of the rear garden, as shown on the plan below.

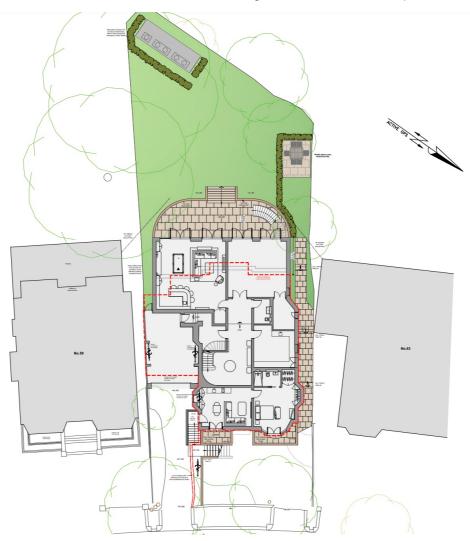


Figure 4: Proposed Lower Ground Floor Site Plan



- 4.4 Currently, a large part of the lower ground floor has a constrained floor to ceiling height, which renders much of the area unusable and unsuitable for modern day living. The proposal therefore involves excavation of the lower ground floor to create a high-quality space for the proposed family dwelling and the new 1-bedroom flat at this level.
- 4.5 New lightwells are sensitively incorporated to the front of the property to enable sufficient levels of light to access the proposed 1-bedroom flat. The lightwells will be encased by appropriate black railings to reflect similar features found at neighbouring properties and elsewhere within the Conservation Area. A partial reconstruction of the retaining wall, which runs alongside the southern driveway, is proposed to enable the creation of a new staircase that connects the front of the property to the garage level.
- The proposal removes the modern front door (circa 1980s) and introduces a new contextual window in its place. The side extension (circa 1980s) above the garage will be marginally increased in height and a new window will replace the three existing windows on its front elevation. All new windows incorporate timber framed casement (painted grey) with glazed bars to reflect the appearance and rhythm of the existing fenestrations on the property. A new timber garage door is also proposed, taking inspiration from neighbouring garages on Redington Road.
- 4.7 The proposal comprises the partial demolition and reconstruction of the rear lower ground, ground and first floor levels. This includes the removal of the modern conservatory at the side (south) of the property. The lower ground floor will be extended to the rear by 4 metres (approx.) and more modest 'stepped' extensions will be provided at the ground, first and second floor levels. The first floor will extend over the existing balcony at this level and a new terrace will be provided at the ground floor, above the new lower ground floor extension. A considered approach has been taken to the terrace which is supported by traditional piers and railings as well as a staircase down to the garden.
- 4.8 The gable end and chimney stack to the north of the roof are to be partially removed and reconstructed. The extension of the northern part of the roof adopts a tiled, pitched form and includes the addition of a contextual dormer window. To the south of this will see the reconstruction of the southern gable which will appear more prominent on the elevation.
- 4.9 Minor alterations to the window arrangement on the north elevation are proposed, including the creation of a sensitive dormer window at roof level. A new staircase is proposed at the south of the property which will serve a new entrance door into the lower ground flat.
- 4.10 The proposal generally retains the existing front courtyard and introduces a new waste enclosure along the northern boundary. A new visitor cycle parking stand is positioned to the south of the new retaining wall on the driveway and two additional cycle spaces are provided within the garage of the main dwelling. The lower ground floor flat is served by an innovative cycle store in the form of a purpose-built cupboard located within the living room area.
- 4.11 The final design was the result of extensive dialogue between the project architect and heritage consultant to ensure that the proposals deliver a building of exemplary architectural quality. This section should be read in conjunction with the accompanying plans and drawings prepared by Griggs Homes. Images of the proposed front and rear elevations are provided below.





Figure 5: Proposed front (top) and rear (bottom) elevation



5.0 Planning Policy Framework

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Development Plan

- 5.2 The development plan for the purposes of this application consists of:
 - The London Plan (2021)
 - Camden Local Plan (2017)
 - Camden Policies Map (2019)
- 5.3 The relevant policies within the Camden Local Plan are as follows:
 - Policy G1 Delivery and location of growth
 - Policy H3 Protecting existing homes
 - Policy H1 Maximising housing supply
 - Policy H6 Housing choice and mix
 - Policy H7 Large and small homes
 - Policy A1 Managing the impact of development
 - Policy A4 Noise and vibration
 - Policy A5 Basements
 - Policy D1 Design
 - Policy CC1 Climate change mitigation
 - Policy CC2 Adapting to climate change
 - Policy CC3 Water and flooding
 - Policy CC5 Waste
 - Policy T2 Parking and car-free development
 - Policy T4 Promoting the sustainable movement of goods and materials.
- 5.4 Other material considerations in respect of planning policy to be taken into account include:
 - The Revised National Planning Policy Framework ("NPPF") (2021)
 - Planning Practice Guidance ("PPG") (2021)
 - Redington and Frognal (RedFrog) Neighbourhood Plan (2021)
 - Redington and Frognal Conservation Area Appraisal and Management Strategy (2000)
 - Camden Planning Guidance ("CPG"):
 - o Access for All (March 2019)
 - Amenity (January 2021)
 - Basements (January 2021)
 - Biodiversity (March 2018)
 - o Design (January 2021)
 - Developer Contributions (March 2019)
 - o Energy efficiency and adaptation (January 2021)
 - Home improvements (January 2021)
 - o Housing (January 2021)



- Transport (January 2021) Trees (March 2019) Water and flooding (March 2019)



6.0 Planning Assessment

- 6.1 This section considers the extent to which the proposed development accords with the relevant development plan policies and other material considerations. The key planning considerations relevant to the proposed development are:
 - · Principle of development;
 - Design and heritage;
 - Residential amenity and impact on neighbouring properties;
 - Basement development;
 - Highways and parking;
 - Sustainability and energy;
 - Flood risk and drainage;
 - Trees and biodiversity; and
 - Air Quality

Principle of development

- 6.2 Paragraph 11 within the National Planning Policy Framework (NPPF) seeks to support Local Authorities that promote the development needs of an area through applying a 'presumption in favour of sustainable development'. Furthermore, paragraph 119 of Section 11. 'Making effective use of land', within the NPPF is also relevant and supports plans that make as much use as possible of brownfield land in order to meet the need for homes and other uses.
- 6.3 Policy H3 (Protecting Existing homes) of Camden's Local Plan (CLP) resists development that would involve a net loss of residential floorspace or a net loss of two or more homes unless certain criteria are met.
- As noted, the proposal seeks to amalgamate the three existing units into two units. The proposal will comprise a large family dwelling occupying the lower ground (rear), ground, first and second floor. A one-bedroom flat is proposed at the front lower ground floor level. Given the fact that the proposal results in a net loss of only one unit and no net loss of residential floorspace (rather, the proposal results in an uplift of approximately 178 sq m residential floorspace), it would comply with Policy H3 and should be acceptable in principle.
- 6.5 LP Policy H7 states that Camden "will contribute to the creation of mixed and inclusive communities" by securing a range of self-contained homes of different sizes, requiring all housing development to include a mix of large and small homes. As noted, the proposal delivers a mix of mix of dwelling sizes, including family accommodation, in compliance with LP Policy H7.

Design and heritage

6.6 In terms of national policy, the key legislation relating to Conservation Areas is set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Specifically, Section 72 requires planning applications to pay special regard "to the desirability of preserving or enhancing the character or appearance of the area."



- 6.7 In addition, paragraph 187 at chapter 16 'Conserving and enhancing the historic environment' within the NPPF requires Heritage Assets to be conserved in a "manner appropriate to their significance". Paragraphs 202 adds that any harm should be weighed against the public benefits of the proposal including, securing its optimum viable use.
- 6.8 With regards to Conservation Areas, paragraph 206 of the NPPF requires local planning authorities to look for opportunities for new development within Conservation Areas to enhance or better reveal their significance, although it is noted at paragraph 207 that "not all elements of a Conservation Area will necessarily contribute to its significance."
- 6.9 LB Camden's design policies are aimed at achieving the highest standard of design in all developments. CLP Policy D1 (Design) requires development to respect local context and character in terms of scale and comprise details and materials that are of high quality and complement the local character.
- 6.10 In response, the design team has worked closely with the heritage consultant to provide sensitive extensions that optimise floorspace whilst having regard to the setting, character and scale of adjacent properties and the wider Conservation Area. The size of the lower ground floor rear extension does not exceed that of the recently constructed modern lower ground extension at to 59 Redington Road. The proposed extensions at the rear ground, first and second floor provide a modest increase in massing, which will remain subservient to the existing building whilst respecting the building lines of the neighbouring properties.
- 6.11 CLP Policy D2 (Heritage) states that within conservation areas, the Council will only grant permission for development that "preserves or, where possible, enhances" its established character and appearance. A thorough assessment of the potential impact of the proposals on the surrounding heritage assets, including the Redington / Frognal Conservation Area, is provided within the Heritage Statement.
- 6.12 The 2000 Redington/Frognal Conservation Area Statement states that Redington Road was laid out in 1875 and features a wide range of primarily early 20th century domestic architecture along its length. It identifies that "…red brick, clay tiles, dormer, and sash windows are common elements to Arts and Crafts, Queen Anne, Edwardian and neo-Georgian houses alike."
- 6.13 Whilst not statutory or locally listed, the Conservation Area Statement identifies Nos. 5-95 (odd)
 Redington Road as a group of buildings that make a positive contribution to the Conservation Area.
 In response, this planning application submission is supported by a Heritage Statement. Section 5 provides a summary of the heritage significance of the site and states:

'The subject site is considered to derive most of its heritage significance from its medium setting value, and its group value along with other Edwardian houses along Redington Road. Its architectural and historic interests are considered to be low to medium, especially given the alterations made to the building over the years. Its archaeological interest is similarly considered to be low to medium.'

6.14 The Heritage Statement concludes that the proposals would make an overall minimal and neutral to positive impact on the character and appearance of the Redington/Frognal Conservation Area and on the settings of any other nearby heritage assets. The proposal will maintain this minimal and



- neutral to positive contribution and any perceived harm is considered to be outweighed by the proposed enhancements, most notably the reinstatement of the single front entrance.
- On the above basis, it is considered the proposals are compliant with the national and local planning policy framework and should be wholly supported in design and heritage terms.

Residential amenity and impact on neighbouring properties

- 6.16 CLP Policy A1 seeks to protect the quality of life of occupiers and neighbours by only allowing development that does not cause harm to amenity. The Council's amenity guidance contains further details on how development should be designed to minimise the impact of the loss of daylight, sunlight, artificial light levels, outlook, privacy and noise. CPG "Amenity" outlines the Council's approach to assessing the impacts of development upon neighbour amenity.
- 6.17 The proposed extensions are sensitively designed, scaled and orientated in a way to ensure that the amenity enjoyed by neighbouring occupants is preserved. It should be noted that there is already an existing balcony/terrace positioned at the rear first floor level. The removal of this terrace and creation of a lower-level terrace at ground floor would not give rise to any further privacy and overlooking concerns. The terrace would be appropriately screened on both sides by way of 1.8m high opaque glazed panels to prevent any overlooking onto the adjoining gardens.
- A noise assessment was also conducted to determine the potential noise impact of the proposed heat pumps and air conditioning unit on sensitive receptors. The assessment concluded that the siting of the plant items in the rear garden coupled with the noise attenuation provided by the proposed acoustic enclosure will result in noise levels that meet LB Camden's standards. In short, there is unlikely to be any adverse impacts in terms of noise and disruption associated with the plant.
- 6.19 A daylight and sunlight assessment has been undertaken to measure the impact of the proposal on the adjacent properties (No.59 and No.63 Redington Road). In summary, the assessment concludes that the proposal will result in no substantial adverse effect on the neighbouring properties and the proposal is generally acceptable in daylight and sunlight terms.
- 6.20 Overall, the sensitive design measures of the scheme will preserve the amenity of neighbouring properties in accordance with CLP Policy A1 and the associated guidance referred to.

Basement development

- 6.21 An extension of the existing lower ground floor is proposed so that it extends across the footprint of the building and provides additional and more useable accommodation.
- 6.22 CLP Policy A5 states that basement development will only be permitted where it is demonstrated that it will not cause harm to:
 - a) Neighbouring properties;
 - b) The structural, ground or water conditions of the area;
 - c) The character and amenity of the area:
 - d) The architectural character of the building; and
 - e) The significance of heritage assets.



- 6.23 In accordance with Policy A5, a Ground Investigation and Structural Basement Impact Assessment has been prepared by Ground and Water and Vincent and Rymill, respectively. The findings of the respective reports conclude that the proposed development will have a minimal impact on surface flows, groundwater and land stability.
- 6.24 Policy A5 also requires basements to be subordinate to the host buildings and therefore:
 - f) not comprise of more than one storey;
 - g) not be built under an existing basement;
 - 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;
 - m) be set back from neighboring property boundaries where it extends beyond the footprint of the host building; and
 - n) avoid the loss of garden space or trees of townscape or amenity value.
- 6.25 In response, the lower ground floor is:
 - one storey;
 - does not exceed 50% of the garden area;
 - is less than 1.5 times the footprint of the host building in area;
 - extends into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
 - does not extend into or underneath the garden further than 50% of the depth of the garden;
 - is set back from neighboring property boundaries; and
 - does not result in the loss of significant garden space or trees or townscape or amenity value.
- The proposed lower ground floor also complies with Policy UD1 (Underground development) within the RedFrog Neighbourhood Plan, which generally requires subterranean development to preserve the character and verdant amenity of the existing garden spaces. The lower ground floor is sensitively scaled and positioned at the rear of the property to preserve the identified root protection areas.

Highways and parking

Car parking

- The NPPF applies a presumption in favour of sustainable development. In relation to transport, paragraph 104 says:
 - "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - a) The potential impacts of development on transport networks can be addressed;



- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."

6.28 Paragraph 107 continues:

"If setting local parking standards for residential and non-residential development, policies should take into account:

- (a) The accessibility of the development;
- (b) The type, mix and use of development;
- (c) The availability of and opportunities for public transport;
- (d) Local car ownership levels; and
- (e) The need to ensure an adequate provision of charging of spaces for charging plug-in and other ultra-low emission vehicles."

6.29 Paragraph 108 says:

"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport."

- 6.30 Camden's adopted policy (Policy T2) is inconsistent with the NPPF in this regard, but nevertheless, states that "The Council will limit the availability of parking and require all new developments in the borough to be car-free."
- 6.31 However, para 10.20 of the policy supporting text states that the Council will consider retaining or reproviding existing parking provision where it can be demonstrated that the existing occupiers are to return to the address where the development is completed.
- 6.32 Notwithstanding the low public transport accessibility level rating of the site, the proposal does not involve the creation of any additional car parking spaces on site, nor will it result in an increase in vehicular movements to and front the site.
- 6.33 The existing driveway forecourt and garage are being maintained for the existing owner occupiers who are returning to the property following completion of the development in accordance with Policy T2.



Cycle parking

6.34 In accordance with London Plan cycle parking standards, the proposal provides 2 cycle spaces within the garage to serve the main family dwelling and 1 space within a purpose-built cupboard to the serve the 1 bedroom lower ground floor flat. A visitor parking space is also provided at the front of the property, which complies with the standards.

Outline Construction Management Plan

- 6.35 CLP Policies A1 and A4 state that a Construction Management Plan (CMP) may be sought for development that includes large scale demolition and basement excavations.
- 6.36 Given that the scale and nature of the proposals, an Outline CMP (pro forma) has been submitted in support of the application. The pro forma provides preliminary measures that will allow the proposed building works to be managed effectively to minimise the impacts on local residents during the construction works. It is anticipated that further information and detail on construction will be confirmed once a contractor has been appointed.

Sustainability and energy

- 6.37 All developments in LB Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage, in line with Policies CC1, CC2 and CC3 of the Local Plan. Part e. of policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. The majority of the existing building is being retained (and extended), with only 17% being demolished, which does not amount to "substantial demolition".
- 6.38 The application is accompanied by an Energy and Sustainability Statement which outlines how the development has been designed to minimise energy use and CO2 emissions in operation through the application of the London Plan energy hierarchy. The proposed development will achieve a 62% reduction in CO2 emissions against baseline levels through the use of passive and building fabric design energy saving measures, exceeding the on-site reduction target of 20% stipulated in section 5 of the Camden 'Energy Efficiency and Adaptation' CPG.
- An all electric air source heat pump (ASHP) is proposed to deliver space heating and hot water demand. The ASHP plant is proposed at the rear garden within an enclosure screened by natural hedging. The Energy and Sustainability confirms that, via the proposed ASHP, three quarters of the energy will be generated from a renewable source (outside air), resulting in significant reductions in carbon emissions.
- 6.40 An overheating assessment was also prepared in support of the Energy and Sustainability Statement. In short, dynamic software modelling identified that the proposed gym at the lower ground floor would likely require active cooling in the form of air conditioning units. In addition, it is considered that the upper floor bedrooms would also likely require air conditioning when considering future weather changes. Further details are provided within the accompanying Sustainability and Energy Statement.



6.41 The proposals also accord with Section 2 'Achieving Sustainable Development' of the NPPF, and Policies SI 1 ('Improving Air Quality') and SI 2 ('Minimising Green House Gas Emissions') of the London Plan, which require proposals to minimise contributions to climate change and ensure that development respects environmental limits, whilst improving quality of life.

Flood risk and drainage

- 6.42 A Surface Flow and Flooding Basement Impact Assessment (SFBIA) has been prepared by Water Environment Ltd in accordance with the Camden 'Water and Flooding' CPG. This concludes that the risk of flooding from fluvial/tidal, pluvial, groundwater and sewers to the proposed development is considered low. Further details can be found Section 3 of the assessment.
- 6.43 In terms of surface water drainage, the SFBIA states that surface water runoff rates can be attenuated to current, present day rates and discharged to existing connections, with a storage requirement of 3m³. It is advised that, within the detailed drainage strategy (to be secured via planning condition), bioretention areas within the landscaping are explored and potential infiltration through the base of permeable surfaces. All paved areas should be of permeable construction, and water butts should be installed on all downpipes. Subject to these recommendations, it is considered that the scheme would not increase peak runoff rates downstream and would not result in increased pressure on the wider drainage infrastructure in accordance with CLP Policy CC3.

Trees and biodiversity

- 6.44 LP Policy A3 states that the Council will resist the loss of trees and vegetation of significant amenity and biodiversity value. Policy BGI 2 of the RedFrog Neighborhood Plan supports the retention of trees and the introduction of selected species on the basis of local character, high biodiversity value and / or high value to insects.
- The proposal, including the basement, has been designed in such a way to protect existing trees of significance. The accompanying Arboricultural Impact Assessment (by Landmark Trees) asserts that the proposed development will have a low impact on the identified trees. It considers that any potential impacts can be largely mitigated through design and precautionary measures. It is recommended that further mitigation can be achieved through replanting. Although this does not form part of the current application, it is anticipated that landscaping will be dealt with via a separate planning application.
- The planning application is also supported by an Ecological Assessment (by Ecological Solutions) to assess the ecological interest of the application site as a whole. The survey found no evidence of roosting bats either within the property or externally on the site. Subject to implementing the recommended mitigation measures (including the provision of nesting boxes), the assessment concludes that "...there will be no adverse effects on any designated sites or protected species as a result of development, and moreover ecological enhancements will be delivered compared to the existing baseline".
- 6.47 For these reasons, the proposal development will not have a significant impact on either the retained trees or wider landscape, thereby complying with CLP Policy A3 and Policy BGI 2 as well as Policies



A5, D1 and D2 of the CLP. As noted, it is envisaged that a detailed landscaping scheme will be dealt with via planning condition or a subsequent planning application.

Air Quality

- 6.48 An Air Quality Assessment has been prepared by Eight Associates. In light of the proposed construction and demolition, the Assessment found that the unmitigated risk to local sensitive receptors from emissions of dust and pollution is deemed to be low. The Assessment found that mitigation measures to reduce exposure of future occupants to pollutants are not explicitly required in this instance. However, the design mitigation hierarchy has been applied nonetheless, to maximise air quality for occupants, where feasible. This includes measures such as the provision of low carbon energy technologies and urban greening.
- On this basis, the proposal is wholly acceptable in air quality terms and is in full compliance with the guidance set out within CLP Policy CC4.



7.0 Conclusion

- 7.1 This Planning Statement has been prepared by high Consulting and submitted on behalf of Mr and Mrs Burns in relation to a planning application at 61 Redington Road for the following proposed development:
 - "Amalgamation of three units into two units and works comprising partial demolition and the erection of a rear extension at the lower ground, ground and first floors, together with excavation to the lower ground floor, alterations to the roof and other associated works"
- 7.2 The development involves a logical amalgamation of the existing three residential units to create two high quality, sensitively designed and energy efficient dwellings to meet modern day living standards.
- 7.3 The style and detailing of the extensions and fenestrations on the proposed front, side and rear elevations (including the roof) of the property reflects the architectural language of the existing and neighbouring properties and is in keeping with the general character of the Conservation Area.
- 7.4 In heritage terms, the proposal is considered to have a neutral to positive impact on the character and appearance of the Redington / Frognal Conservation Area.
- 7.5 The excavations and extensions at lower ground floor level will be subordinate to the host building and rear garden and respectful to the neighbouring properties. The Basement Impact Assessments demonstrate that the proposed excavations will be acceptable in structural and environmental terms.
- 7.6 The proposal has been designed in such a way to retain existing trees of notable significance, while in amenity terms, it has been demonstrated that there will be no adverse impacts upon neighbouring residents.
- 7.7 For the reasons set out in this Statement, the proposed development accords with the development plan and constitutes sustainable development. Accordingly, planning permission should be granted without delay.



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