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80-83 Long Lane,
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16th June 2023

Via email only

Dear Sir/Madam,

FULL PLANNING APPLICATION – THE TOWN & COUNTRY PLANNING ACT 1990

DEMOLITION OF EXISTING TWO STOREY DETACHED DWELLINGHOUSE), REPLACEMENT WITH NEW TWO STOREY DETACHED DWELLINGHOUSE (WITH ASSOCIATED ACCOMMODATION WITHIN THE ROOFSpace) AND ASSOICATED HARD AND SOFT LANDSCAPING AND DRAINAGE.

7 REDINGTON GARDENS, LONDON, NW3 7RU

Please accept this covering letter as an accompaniment to this full planning application for a replacement dwelling and associated works. This letter provides a summary of the site and the proposed development.

Please also find enclosed a completed application form accompanied with a full set of existing and proposed plans and elevations, Design and Access Statement, Arboricultural Impact Assessment, Flood Risk Assessment, Noise Assessment, Daylight/ Sunlight Assessment and Construction and Demolition Management Plan Proforma. An Ecological Appraisal, Air Quality Assessment and Sustainability Statement will follow.

The site:

The site is located on the north-western side of Redington Gardens, to the east of the junction with Redington Road. It comprises a post war, two storey, detached residential property. The building is of Scandinavian character, finished in yellow brick and render with a shallow pitched copper roof. The site slopes down from front to rear by approximately 0.6 metres from street level.

The street is characterised by detached three storey dwellings with landscaped frontages in behind low-level brick boundary treatments. The site lies within Redington and Frogna Conservation Area and is not statutory or locally listed. The neighbouring buildings have recently been re-developed.

The site lies within a flood risk zone of 1 and is identified as being at risk of surface water flooding on the Environment Agencies Flood Risk Map for Planning and is located in an area with a public transport accessibility level (PTAL) of 0.

Planning history:

On the 14th of February 2023, pre-application advice (reference 2023/0844/NEW) was sought with respect to extensions and alterations to remodel the existing dwelling. The formal written response was received on the 5th of June 2023. The advice can be summarised as follows:

The substantial demolition of the building would need to be fully justified in respect to resource optimisation and energy efficiency. The principal of redevelopment of the existing neutral building has been established by neighbouring developments. The proposed neo-Georgian design is considered to be appropriate, subject to appropriate scale, detailing, materiality and the retention of an adequate gap between the property and the neighbour at no.24. Soft landscaping, tree protection and ecological enhancement should be secured. The response also suggested that that adequate waste and cycle storage should be proposed. The advice set out that the application will need to be accompanied by a tree report, carbon lifecycle analysis, sustainability statement, air quality assessment, daylight/sunlight/overshadowing assessment and a legal agreement.

In response to the pre-application feedback, the scheme has been revised to retain the gap between the application property and the neighbouring property. An arboricultural report, daylight/sunlight and air quality reports accompany the submission, with a sustainability statement (including carbon lifecycle analysis) to follow. It is anticipated that a legal agreement will be progressed during the application.

36 Redington Road

On the 16th of April 2021, planning permission was granted (reference 2020/4520/P) for the erection of a three storey plus basement house, front and rear lightwell and associated landscaping following demolition of existing dwelling (part retrospective).

24 Redington Gardens

On the 22nd of July 2016, planning permission was granted (reference 2016/1015/P) for the demolition of existing dwelling house and erection of a replacement dwelling house, including the excavation of the basement and associated hard and soft landscaping.

25 & 26 Redington Gardens

On the 8th of June 2015, planning permission was granted (reference 2015/3200/P) for the demolition of two existing dwellings and the erection of two semi-detached dwellings include the excavations of basements.

The proposal:

This planning application seeks permission for the replacement of the existing dwelling and associated works.

The proposed neo-Georgian style dwelling is to be finished in traditional cross Flemish bond brickwork with corner, banding and opening detailing. The roof is to be finished in plain clay tiles and the proposed windows are painted, double glazed, timber sashes.

The proposal includes the re-landscaping of the front and rear garden with permeable pavements. A surface water attenuation tank is proposed, below ground, to the front of the building. The existing front boundary treatment is to be retained, along with a single on-site car parking space. The existing trees and hedges are to be retained and protected during the development.

The dwelling will have a hall, cloak room, plant room, boot room, laundry, pantry and, kitchen and reception/dining room at ground floor level. At first floor level is a master bedroom with dressing room and bathroom, a study, landing and two en-suite bedrooms. At second floor level is a study, a storeroom a family bathroom and two further bedrooms.

For full details please refer to the drawings, design and access statement and heritage statement prepared by Wolff Architects.

Planning Policy

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 11 (making effective use of land), Section 12 (achieving well designed places), Section 14 (meeting the challenge of climate change), Section 15 (conserving and enhancing the natural environment) and Section 16 (conserving and enhancing the historic environment).

Local Planning Policy

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017), Redington Froggnal Neighbourhood Plan (2020) and associated Supplementary Planning Guidance. The following policies are considered relevant to this proposal:

London Plan (2021) (LLP)

- Policy D1 – London's form, Character and Capacity for Growth
- Policy D3 – Optimising Site Capacity Through a Design Led Approach

- Policy D4 – Delivering Good Design
- Policy D6 – Housing Quality and Standards
- Policy D12 – Fire Safety
- Policy HC1 – Heritage Conservation and Growth
- Policy G6 – Biodiversity and Access to Nature
- Policy G7 – Trees and Woodlands
- Policy SI2 – Minimising Greenhouse Gas Emissions
- Policy SI12 – Flood Risk Management
- Policy SI13 – Sustainable Drainage
- Policy T5 – Cycling
- Policy T6.1 – Residential Parking

Camden Local Plan (2017) (CLP)

- Policy A1 – Managing the Impact of Development
- Policy A3 – Biodiversity
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change
- Policy CC3 – Water and Flooding
- Policy HC1 – Heritage Conservation and Growth
- Policy G6 – Biodiversity and Access to Nature
- Policy G7 – Trees and Woodland
- Policy SI2 – Minimising Greenhouse Gas Emissions
- Policy SI13 – Sustainable Drainage
- Policy T1 – Prioritising Walking, Cycling and Car-Free Development
- Policy T2 – Parking and Car-Free Development

Redington and Frognal Neighbourhood Plan

- Policy SD1 – Refurbishment of Existing Building Stock
- Policy SD2 – Redington and Frognal Conservation Area
- Policy SD3 – Car Free Development
- Policy SD4 – Sustainable Development and Redington and Frognal Character
- Policy SD5 – Dwellings: Extensions and Garden Development
- Policy SD6 – Retention of Architectural Details in Existing Buildings
- Policy BGI1 – Rear Gardens and Ecology
- Policy BGI2 – Tree Planting and Preservation

Supplementary Planning Guidance Documents (SPDs)

- Design (2021)
- Home Improvements (2021)

- Amenity (2021)
- Transport (2021)
- Energy Efficiency and Adaption (2021)
- Trees (2019)
- Water and Flooding (2019)
- Biodiversity (2018)

Planning Assessment

Principle of Development

Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The site comprises a single residential dwelling. There are no development plan or national planning policies that render the general principle of replacing existing residential properties as a matter of principle, subject to the consideration of all other detailed matters. A consideration of such matters is below.

Design and Heritage Impacts

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on decision makers to pay special attention to the desirability of preserving or enhance the character and/or appearance of Conservation Areas.

Camden Local Plan (CLP) Policy D1 requires development to be of the highest architectural and urban design quality and have regard to design and visual impact, the context within which it is placed, and the contribution it makes to the landscape qualities of the area. The aim of this policy is reflected in London Plan Policy D4 (Good Design). Specific guidance in relation to extensions to existing properties and achieving good design is further provided in the 'Home Improvements', 'Design' Camden Planning Guidance (CPG) and Redington and Froggnal Conservation Area Appraisal.

CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. These aims are further reflected in London Plan Policy CH1 (Heritage Conservation and Growth).

The Redington and Froggnal Neighbourhood Plan (RFNP) elaborates on what the Neighbourhood Forum consider to be high quality design. Notably policies SD1-6 emphasises the importance of development scale, landscaping, boundary treatments, space between buildings and materiality to the character of the area.

The existing building is a late C20 building that is of no special architectural or historic significance and is identified in the conservation area appraisal. The building is considered to be neutral contributor to the character and appearance of the Conservation Area. The sites soft landscaping makes a positive contribution to the street scene and the contribution the site makes to the verdant character of the conservation area.

Redington Frogna Conservation Area contains buildings of a range of architectural styles including Queen Ann Revival, Tudor-Gothic, Arts and Crafts, later modern infill/redevelopment. Prevalent materials include red brick, render, hanging tiles and clay tiled roofs.

The proposed dwelling has a slightly greater footprint and ridge height than the existing building, it respects existing building line, reflects the proportions and positive design features found in the locality. The site retains relatively generous gap between the building and its neighbours, allowing glimpsed views through the built form to the soft landscaping beyond. All existing trees and hedges of merit are proposed for retention. The site will continue to contribute positively to the verdant character of the street. It is also proposed to retain and repair the existing low level boundary treatment.

The proposed dwelling is to be finished in traditional Flemish bond brickwork with header, queen closer, brick banding and quoin detailing with a clay tiled roof and painted timber sash windows. The detailing, bays, dormers and fenestration pattern provides articulation and interest and draws influence from detailing found on positive buildings in the conservation area. The single storey rear projection is a lightweight glazed structure finished in timber/ composite panelling. The proposal provides a modern take on the Queen Anne style, which would harmonise with the wider streetscape.

The proposed building represents high-quality design which is sympathetic to the character and appearance of the existing building, neighbouring buildings and the conservation area. It is considered that the proposed works will enhance the quality of the host dwelling and consequently the contribution the building makes to the special interest of the conservation area. The development is considered to conform to the design aspirations of the London Plan, Local Plan and Neighbourhood Plan and enhance the character and appearance of the Redington Frogna Conservation Area in line with s.72 of the Listed Buildings and Conservation Areas Act 1990.

Neighbouring Amenity

CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. Camden's Amenity CPG recommends 18 metre separation distances between directly facing habitable windows and that daylight/sunlight assessments should accompany applications whereby the BRE's 25 degree and 45 degree light tests are not met. The guidance also advises that new buildings and extensions should be designed to avoid giving rise to overbearing, harmful outlook impacts or other un-neighbourly disturbance.

The neighbouring buildings at no.36 Redington Road and no.24 Redington Gardens do not have any non-obscure glazed habitable windows in the flank elevations that adjoin the application site. Most of the proposed upper floor rear facing windows are either secondary windows or windows serving non-habitable rooms. By virtue of the modest scale of the proposed extensions, intervening soft landscaping, boundary treatments and their relationship to neighbouring properties, the proposed extensions and alterations will not have a materially different impact on neighbouring amenity through an overbearing impact, loss of privacy, outlook or loss of daylight and/or sunlight than the

existing building. The Daylight and Sunlight assessment that accompanies the submission verifies that the proposed development would not have adverse light impacts on neighbouring habitable windows or amenity space in accordance with latest British Research Establishment guidance.

The continued use of the ancillary residential garden would not materially change the existing noise environment for neighbouring occupiers. The proposal preserves neighbour amenity in line with CLP Policy A1.

Living conditions

CLP Policy H6 seeks to ensure that development delivers high quality housing. Including family homes that meet the nationally described space standards.

The re-modelled dwelling exceeds the nationally described space standards in respect to room sizes and layouts. The dwelling would retain a good sized private amenity space and would provide a high quality living environment for the occupants. The proposal accords with Policy H6.

Parking

CLP Policies T1 and T2 and RFNP highlight the importance of prioritising walking and cycling as a sustainable mode of transport and indicate that car-free development across the borough is a key aim. Neighbourhood Plan Policy SD3 extends the requirements of policy T2 insofar as it seeks to secure car free development for developments involving reconfiguration and extensions to existing buildings. This is also echoed in the Transport CPG.

Whilst it is acknowledged that CLP Policy T2 and RFNP Policy SD3 requires all new developments within the borough to be car-free and that the Council seek to limit onsite parking to spaces designated for disabled people where necessary, the supporting text to the policy states that if the existing occupiers are to return to the address when the development is completed the Council will consider retaining or re-providing existing parking provision. In this instance, the applicant, who is the owner of the property, will be a returning resident. It is therefore considered acceptable for the parking space to be re-provided and their eligibility for car parking permits retained.

The proposal complies with the requirements of Local Plan Policies T1 and T2 and Neighbourhood Plan Policy SD3.

Sustainability

Local Plan Policies CC1 sets out that the Council will encourage all new development to minimise the effects of climate change and meet the highest feasible environmental standards. This includes requiring proposal that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Policy CC2 requires all development to adopt appropriate climate change adaption measures including reducing surface water runoff, including Sustainable Drainage Systems and incorporating bio-diverse roofs.

Camden's Design Guidance Document Energy efficiency and adaptation (2021) contains guidance on how to reduce carbon dioxide emissions in line with the energy hierarchy (be lean, be clean, be green). Recommended measures include passive measures such as making the most of daylight/sunlight, minimising overheating through natural cooling and where appropriate utilise active measures. The guidance also supports the use of energy and water efficient fixtures and fittings, sustainable heating systems and incorporation of renewable technologies.

The proposal incorporates SuDs, in the form of attenuation tanks and restricted discharge to the existing combined sewer, yielding a significant improvement to the surface water flood resilience of the site. The proposed building will be thermally efficient. The proposal incorporates high levels of insulation and air tightness along with an Air Source Heat Pump and underfloor heating system which delivers carbon emissions savings above current building regulations requirement. The building will be fitted with water and energy efficient fixtures and fittings and will meet the higher water efficiency standards, set out in current building regulations. A detailed sustainability statement will be forthcoming.

The proposal will contribute to minimising the effects of climate change and is a sustainable form of development, in line with Local Plan Policies CC1 and CC2.

Arboricultural Impacts

Local Plan Policy A3 sets out that the Council will protect and seek to secure additional trees and vegetation as part of new development. RFNP Policy BGI2 seeks to ensure that trees of merit are retained and any trees that are required to be removed are replaced by suitable specimens.

The application is accompanied by an arboricultural impact assessment that identifies 18 trees within or in close proximity of the site boundary. This includes 1 category A Sycamore, 2 category A lime, 2 category B Limes, 1 category B Whitebeam and several category C trees. All trees of merit will be retained. In the interest of good arboricultural practice and to prevent potential conflict with the extension to the north of the building, the low quality, multi stemmed Elder shrub and holly is proposed for removal. The shrubs are of no amenity value, individually, their removal would not harm the verdant character of the site. Some trees will also require pruning to facilitate the development. The development results in modest encroachment into some of the root protection areas of the trees that are to be retained. However, the assessment concludes that with the use of appropriate digging methods, foundations and root environment improvements, the proposal would not adversely impact the viability of any retained trees. Additional tree planting is proposed as part of the landscaping scheme. Overall, the proposal was considered to have a low arboricultural impacts.

There would be no conflict with policies A3 and BGI2.

Ecology Impacts

London Plan policy G6 sets out that development proposals should manage impacts on biodiversity and aim to secure a net biodiversity gain. Local Plan Policy A3 states that the council will protect and enhance sites of nature conservation and biodiversity by seeking the protection of features of

conservation value, where possible and seek to secure additional trees and vegetation. Neighbourhood Plan Policy BGI1 states that unbuilt areas in development sites must be designed to enhance their ecological, wildlife and residential amenity values.

The ecological appraisal submitted with the application confirms that the proposal would not have an adverse impact on any designated ecological sites and the site does not contain any habitable of special importance. The existing trees on site provide habitat of moderate local value, with all but two proposed for retention. He scrub, hedgerow, grassland and building habitat of negligible local value. The main building is of moderate potential for bats with further survey work recommended. It is also recommended that external lighting avoids overspill onto the landscaped areas, demolition and tree works avoid the bird nesting season and ecological enhancement I the form of bat boxes, native landscaping, log piles and boundary treatment gaps are incorporated into the landscape design.

Flood Risk and Drainage

Local Plan Policy CC3 will ensure that the development does not increase flood risk and reduces the risk of flooding, where possible.

The site is located in flood risk zone 1 (lowest risk) of the Environment Agencies Flood Risk Map for Planning but is located in an area at risk of surface water flooding. The flood risk assessment submitted with the application recommends restricted discharge to the existing combined sewers, via on site attenuation tanks, along with permeable hard surfacing. The proposed drainage scheme achieves an 85% improvement in run off rate when compared to the existing drainage arrangements and is designed to capture surface water in a 1:100 year event with a 40% climate change buffer. The proposal would reduce the risk of flooding, in accordance with CLP Policy CC3.

Construction Management

CLP Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours by considering the impacts of the construction phase, including the use of Construction Management Plans.

This submission is accompanied by a completed Construction/ Demolition Management Plan pro forma. This confirms that the demolition and construction of the proposal will be managed appropriately, with the view if minimising neighbour amenity and highway impacts. The proposal complies with CLP Policy A1.

Summary:

As demonstrated within this letter, the principle of development in this location is supported. The proposal facilitates the enlargement of and provision of an energy and water efficient family home. The proposal enhances the contribution the site makes to the visual amenity of the locality and the character and appearance of the conservation area whilst preserving neighbour amenity, protecting existing trees and improving energy, water efficiency and site drainage. The development is

sustainable development and in accordance with the Development Plan. Therefore, it is respectfully requested that planning permission is granted.

I trust the commentary above is clear but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

Stuart Minty
Director
SM Planning