

**REDINGTON FROGNAL**  
NEIGHBOURHOOD FORUM

20 May 2024

Dear Mr. Nicholls,

**2024/1004/P and 2024/0447/P: 7A Langland Gardens – objection**

The Redington Frogna! Neighbourhood Plan was developed to conserve gardens and protect them from unsustainable development.

The applicant fails to acknowledge the Neighbourhood Plan and does not quantify the areas of soft natural surface and hard surface, as existing and proposed, nor does it provide details of planting and planted areas and natural SuDS measures.

Specific policies with which the proposal conflicts are:

**SD 1:**

- i. Development must have no adverse impact on biodiversity and wildlife habitat, including through loss of garden space.
- ii. If there is likely to be an adverse impact, this must be offset by gains elsewhere within the site, such as tree and hedge planting.
- iii. The achievement of a net gain in biodiversity is strongly encouraged
  - v. The creation of garden development and building extensions must 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 against climate change and the urban heat island effect

**SD 4:**

- vii The area of soft natural garden space within the site should be maintained or increased.
- 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.

**SD 5:**

- iii Extension into garden space, including outbuildings, must 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.

The policies relating to Biodiversity and Green Infrastructure are also relevant:

**BGI 1:**

Open/unbuilt areas within development sites must be designed to enhance their ecological, wildlife and residential amenity values. This includes:

- i. retaining, providing and reinstating trees, hedgerows and other planting using native species, especially those of high value to biodiversity, as set out in the 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character. A very high urban greening score is encouraged;
- ii. achieving an urban greening score in excess of the London Plan target;

- iii. Maximising the area of soft landscaping and using planting with high value to insects and pollinators, as set out in the 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character.
- iv. Minimising hard surface areas to those necessary for the functioning of the site..... and ensuring they are permeable to allow drainage of surface water

BGI 2:

- 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.
- iv. Development should seek opportunities to create, strengthen and restore tree lines and biodiversity corridors, reducing the incident of breaks and the length of gaps.

UD 1:

Residential basements and other underground development.....should have no significant adverse impact on

- i a 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...."
- i e neighbouring properties, through impacts, and cumulative impacts, on ground water and land stability.
- ii. Development proposals that include new water features to manage drainage.....will be encouraged
- iii Development proposals should be accompanied by sufficient information to allow proper assessment of impacts, including how they:
  - a. will not cause cumulative erosion if garden space; and
  - b. will not contribute to localised groundwater flooding.

Under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as Amended, it is important to understand the central contribution of the amalgam of rear gardens and trees to the Conservation Area character. The removal of natural soft garden area for large building extensions is not compatible with the garden suburb landscape character of the Redington Froggnal Conservation Area.

Yours sincerely,



Secretary

Redington Froggnal Neighbourhood Forum

<https://www.redfrogforum.org>

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