



# *The Heath & Hampstead Society*

The Society examines all Planning Applications and Notices of Intent for tree work relating to Hampstead and Hampstead Heath Fringes, and assesses them for their impact on the Conservation Areas, the local environment and building stability.

To London Borough of Camden, Planning Team

**Planning Ref:** 2023/4898/P

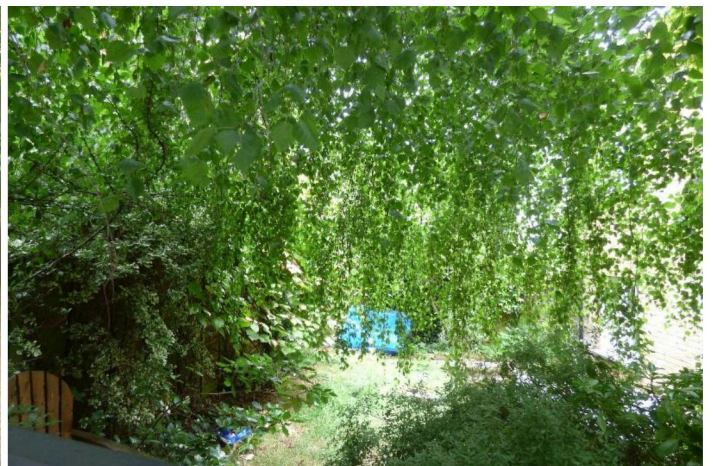
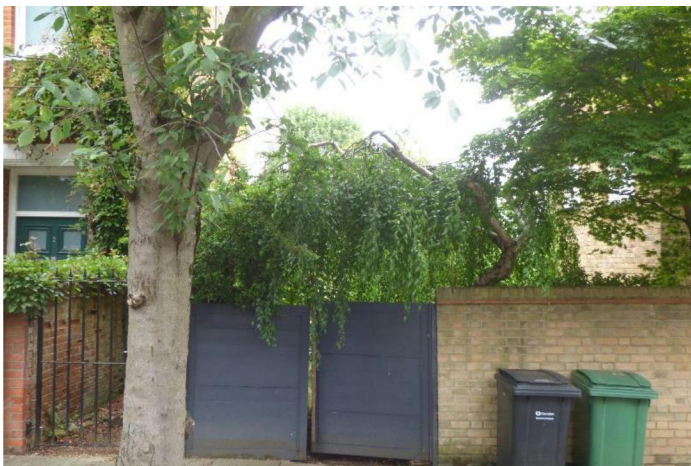
**Address:** 2 and a half, Rudall Crescent London NW3 1RS

**Case Officer:** Kristina Smith

**Date:** 11<sup>th</sup> July 2024

Following on from its previous objection the Heath & Hampstead Society should like to make some additional comments following the changes to this proposed planning application.

It is clear from the new entrance gate through the front boundary that the existing trees here will have to be removed to allow sufficient head height for access:



The low head room and low top branches of this beautiful weeping birch tree and its neighbouring maple tree – currently providing a large street treescape amenity – mean they will have to be felled. This will produce a huge loss in biodiversity, habitat and treescape amenity.



The gap between 2 and a half and 2 Rudall Crescent provides a good view of the trees and greenery beyond, which will be lost.

The BRE guidelines on Right to Light recommend that at least half of the garden or open space can receive at least two hours sunlight on 21 March. No evidence has been provided that this is the case with the proposed extension.

We should like to argue that the decision to accept 'sub-standard' daylight and sunlight on balance with wider benefits provided by new development should take the following factors into account:

**DAMAGE from this proposal:**

Future owners:	Large and significant reduction in garden and green outside space.
Neighbours:	Significantly reduced light to garden of 11 Willoughby Road Overlooking from use of roof terrace. Strategy to increase light (removal of hedge, essentially much more than 2 meters above 11 Willoughby Road garden) has increased overlooking.
Conservation Area:	Loss of views through gap and across site to trees and greenery beyond
Emerging HNP:	Loss of relatively permeable ground below the proposed extension from construction of its foundations. There should be a 10% BNG and a storm attenuation tank: <b>Policy DH1 (Design) 1c</b> 'For extensions, they are subservient to the original footprint and mass of the house, contribute positively to the character of the area and provide biodiversity net gain (BNG)'; and <b>Policy DH3, 3 and para 3.39</b> 'Developments that remove soil, as for foundations for extensions, basements, etc., should mitigate for loss of water absorption by use of attenuation tanks and/or by removing hardstanding elsewhere on site.
South End Flood Zone:	Larger building footprint, reduction in potential for converting impermeable to fully permeable surfaces = contribution to flood water during storms and sewer surcharging in SEFZ.
Camden Local Plan:	No additional residence.
Environment Act 2021:	A Biodiversity Net Loss.

**BENEFITS from this proposal:**

Apart from this residence being converted from one 2-bed & 2-bath residence to one 3-bed & 3-bath residence (with 4 WCs), we cannot think of any. We urge the Camden Planning Officer to weigh up this balance when determining the outcome of this application.

We would also urge the Camden Planning Officer to take note of the Environment Principles Policies Statement (Nov 2023), part of the Environment Act 2021 which not only affects new policies, but also has a requirement for existing policies and guidance – such as the National, Local and Neighbourhood Planning Guidance and Plans to be interpreted with its five Environmental principles in mind.

If Camden is minded to consent this application, we request that

- 10% BNG be conditioned: Emerging HNP Policy NE1: Supporting biodiversity and mitigating climate change.
- A small but **deep** storm attenuation tank such as below the steps up to the new front door or beneath any remaining hard standing be conditioned, as well as attenuation crates to compensate for the increase in roof area, hence increased rainwater passage to the drainage system (green roofs make little discernible difference to storm water run-off, particularly following a period of rainfall when the green roof is already saturated) and loss of relatively permeable soil 'sponge' when the foundations are dug out. Emerging HNP **Policy DH3, 3 and para 3.39** as above.
- The 19 sq/m for car parking NOT to be covered with so-called permeable paving that has a life span of 18 months without regular maintenance and little more if it is. This form of hardstanding makes

no discernible change to run-off. There are many methods that allow for a realistic reduction in run-off, including placing storm attenuation crates below the car parking area and limiting unplanted areas to 2 wheel tracks.

- A flexible joint between the 2 extensions be conditioned as there is known movement in this part of Willoughby Road/Rudall Crescent due to silt erosion by the action of groundwater and leaking sewers. 9 Willoughby Road which 2 & a half Rudall Crescent is a fixed extension to, is known to have suffered subsidence movement over at least 50 years and most probably very much longer. A large and significant ash tree was removed recently by the insurance company for recent further cracking and movement likely caused by silt erosion by groundwater action and mains water wash-out, determined from the pattern of cracking. Considering the quantities of water in this area and frequent fracturing of water mains still not yet replaced in Willoughby Road or Rudall Crescent, this is likely to continue.

Dr Vicki Harding, Society Tree Officer, Heath & Hampstead Society, Planning Sub-Committee