

REDINGTON FROGNAL
NEIGHBOURHOOD FORUM

14 April 2025

Dear Miriam,

2025/1085/P: Frognal Lane Garages – object

The Neighbourhood Forum supports the principle of the redevelopment of Frognal Lane garages as residential accommodation, in accordance with section 5.1 of the Neighbourhood Plan and site reference RF 4.

However, it is astonishing that the proposal fails to take account of the policies of the Redington Frognal Neighbourhood Plan. As a result, the design proposed has many shortcomings, is not compliant with the policies of the Redington Frognal Neighbourhood Plan and, in particular, does **not** conform to policies:

- SD 2 Redington Frognal Conservation Area. While the site is opposite (on the border with) the Redington Frognal Conservation Area, it will directly impact the green settings of this Edwardian garden suburb Conservation Area and of St. Andrew's Church (grade II listed).
- SD 4 Redington Frognal Character. The proposal does not complement the distinctive character of the Redington Frognal Neighbourhood Plan Area and is not compliant with policies:

iii: the development will cause substantial detriment through loss of light and increased shading to Palace Court;

v: the plot coverage ratio of buildings to open space is inconsistent with the character of the area, and does not include the provision of extensive garden areas. It would be helpful to be provided with measurements (in square metres) of the areas of hard and natural soft surface;

vi: the proposed front gardens are largely hard surface and lightwells, with minimal rear gardens. This lack of garden space fails to reinforce the established pattern of front and rear garden spaces, in an area of high surface water runoff;

vii: the area of soft natural green space within the site has not been increased;

viii: the landscaping at the front incorporates too much hard surface with little planting with a high value to biodiversity;

ix: garages are proposed in place of open spaces of 2-4 metres. Gaps providing views through built frontages are required in order to allow maintenance and views through to a verdant rear garden. The garages should be omitted from the proposal;

xi: access to garages does not constitute an active frontage onto Frogmal Lane;

xii: the design fails to include features to support the bats and birds which forage and commute throughout the Neighbourhood Plan Area. Eaves and bird bricks should be incorporated;

xiii: the design does not complement the architectural quality of Frogmal Lane;

- BGI 1 i to v: the proposed site plan fails to maximise the area of soft natural surface and the urban greening factor has not been calculated.
- BGI 2: the Forum has concerns about the development's impact on the two very mature street trees directly outside in Frogmal Lane, including during the construction phase and through vehicles driving over the trees' root protection zones in order to access garages.
- UD 1:
 - I: the encroachment of the basement into 50% of the garden space will adversely impact the viability of the garden space for tree planting. Policy UD 1 i requires a soil depth of 2-3 metres.

The Flood Risk Assessment should be corrected to refer to the lost River Westbourne and to Branch Hill Pond, the source of the River Westbourne, as the nearest surface water features:

<https://www.redfrogforum.org/underground-rivers/>
<https://www.redfrogassociation.org/branch-hill-project/>

The Forum would like to receive details of how the development will avoid exacerbating the subsidence at neighbouring properties;

iii. It is not clear how the proposal, with large expanses of hard surface, will avoid contributing to localised groundwater flooding;

Additionally, the proposal is not in conformity with Camden Local Plan policy T2, sections 10.17 - 10.18. It is the Forum's understanding that the new development will not be occupied by the owners of the existing garages.

Non-traditional design

The block design proposed will neither preserve nor enhance the setting of the Conservation Area nor form a positive contribution to the streetscape. The brutalist rear of the proposed building is especially inappropriate for the verdant character of Neighbourhood Plan Area

Consideration should be given to a traditional design, responding to the proportions, composition and fenestration of the surrounding properties, but on a smaller scale.

Design Guidance for planning applicants is set out in section 6.3 of the (pages 93-107) of the Neighbourhood Plan.

Front boundary treatment, hedges and garden

A front boundary treatment, in the form of a hedge (eg privet or ivy) or a low brick wall, incorporating a native hedge behind, and well vegetated gardens, would be supported (policies SD 2 and BGI 1).

The wall should ideally be constructed from clinker bricks (also referred to as lava bricks), which are a key feature of the Frognal ward. Such a front boundary wall and hedge would help to repair the losses to the verdant nature in parts of Frognal Lane, caused by off-street parking. In order to enhance the streetscape, any gap in the boundary should be a maximum width of one car or 20%, whichever is the lesser.

A generous and well-vegetated rear garden, with trees and side and rear boundary hedges, should form part of the proposal, to accord with policies SD 4, BGI 1 and BGI 2.

Loss of amenity to Palace Court

The proposal will cause very substantial loss of amenity to residents at Palace Court. The Forum believes that the applicant's daylight and sunlight report has not identified all the habitable rooms at Palace Court and, consequently, the Daylight and Sunlight report does not present an accurate reflection of the daylight and sunlight losses caused to many residents at Palace Court.

Conclusion

Due to non-compliance with the policies above, the design will:

- harm setting of the Redington Frognal Conservation Area, St. Andrew's Church (grade II listed) and the Frognal Lane Arts and Crafts streetscape
- cause substantial loss of amenity for many neighbouring residents
- fail to maximise the potential to create wildlife habitat
- risk exacerbating ground water flooding and impact land stability.

Yours sincerely,

Nancy Mayo

Secretary

Redington Frognal Neighbourhood Forum

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