

Peres Da Costa, David

From: Raffaella Morini <[REDACTED]>
Sent: 31 August 2016 03:05
To: Peres Da Costa, David
Subject: 2016/2997/P – 28 Redington Road: objection

30th August 2016

For the attention of:
David Peres Da Costa, Planning Officer

Dear Sir,

I am writing to **object to planning application 2016/2997/P – 28 Redington Road.**

Please consider the following reasons:

1. The heritage statement supplied by the applicants is biased and inconsistent.

It argues that the existing building is characterised by "an average and pedestrian design" (heritage statement: 3.6) and claims that "the quality of the architecture proposed is commensurate and in some cases arguably better than that which makes up the surrounding conservation area" (heritage statement: 5.13). These statements are the personal opinion of the writers, who fail to provide adequate and sound proof to support their reasonings.

The writers also appear to keep changing their mind on the character of the conservation area, which they define in turn as "eclectic and varied, reflecting the very individual nature of its houses", "large individually designed residential buildings that have a broad style in common", and "arts and crafts inspired house".

I strongly suggest that you consult other experts and obtain a more balanced and objective report on which to base your decision.

2. It is plain for everybody to see that there is no advantage in destroying a quality period house in order to build an average-looking, mock-style new build with no architectural merit, rather than for the developers to fill their own pockets.

The applicant argues that this would permit the provision of 8 new flats, but this could also be obtained by carefully refurbishing the existing property. This would avoid:

- the unnecessary creation of waste, noise and disruption to amenity and quality of life of the area's residents, caused by demolition, excavation and building, not to mention the negative impact on sustainability;
 - constructing an unnecessary car park, in a city where pollution levels are dangerously high and in a borough that discourages parking spaces in newly-built residential buildings;
 - digging an enormous amount of earth, on a site with a delicate geological formation and the presence of heavy clay;
- (arboricultural report commissioned by the applicants - observations - 3.1.3: "In terms of the British Geological Survey, the site overlies the Claygate Member / Beds [...] the associated soils are

generally, highly shrinkable clay; e.g. slowly permeable seasonally waterlogged fine loam over clay. Such highly plastic soils are prone to movement: subsidence and heave.”)

3. The proposal will unnecessarily endanger and possibly destroy the life of a significant number of mature trees (arboricultural report 3.2.3: "In terms of age demographics there is a preponderance of early mature and mature trees") that stand very close to the proposed building layout. These trees are within the Redington/Froggnal Conservation Area, and are therefore, by law, under the protection of Camden Council. I urge the Planning Officer to make sure that these trees are indeed given the proper consideration and protection.

The arboricultural report commissioned by the applicants identifies a number of "potentially significant primary constraints upon development" and "a variety of secondary constraints", while admitting that there is a considerable risk of excessive disturbance to roots and root damage to the retained trees. It then proceeds to offset these risks by proposing a series of time-consuming and expensive actions, ranging from manual excavation, specialist demolition and no-dig construction techniques, to compressed air injection and sensitive pruning works, in order to "mitigate" or, in some cases, only "partly mitigate" (please note: mitigate, but not prevent) the risks posed by the building works.

It is my understanding that these measures are guaranteed only by way of 'faith' in the applicant's honesty, as the council doesn't have adequate resources to enforce their application and supply the necessary supervision (arboricultural report 7.3: "with suitable mitigation and supervision the scheme is recommended to planning"). This is too big a risk to leave in the hands of the applicants. It equals to asking a businessman to spend a higher sum of money and slow the building schedule in order to afford protection to the survival of trees. It is well known that the majority of developers consider it cost-effective to destroy the trees and pay the ensuing fines, rather than exercise the sensitive care necessary to protect those trees that are in their building's way.

Please note the complexity of some of these recommendations, that must be taken in order not to damage the trees. An example:

"6.3.1 All plant and vehicles engaged in demolition works should either operate outside the RPA, or should run on a temporary surface designed to protect the underlying soil structure. The demolition of the building should proceed inwards in a "pull down" fashion. Hard surfacing within a RPA should be lifted manually with caution.

6.3.2 The path of foundations through RPAs will be manually excavated to 750mm depth under arboricultural supervision; any roots encountered within the trenches / pits will be cleanly pruned back to an appropriate junction with a sharp pruning saw or secateurs back to a junction. Roots larger than 25mm diameter may only be cut in consultation with an arboriculturalist."

4. The landscape design supplied claims that "The proposals ensure the property will continue to be set back behind a dense corridor of vegetation". However, looking at the plants density on the indicative plant list: "ornamental woodland: 2L @ 3 plants per m2". (where 2L indicates the volume capacity of the pots in which the plants are grown prior to be planted on site). This is a very low density of planting (not to mention the minimal variety of plant species for such a large area of vegetation) and can hardly be described as a dense corridor of vegetation. This fact also contradicts the claim that "The landscape works will not only protect the existing wildlife habitats but will, in time, increase levels of biodiversity". In addition, the proposal fails to demonstrate in any way how their scheme will affect wildlife.

Thank you and best regards,

Raffaella Morini
BA (Hons), Dip Garden Design, Dip Planting Design

