



REDINGTON FROGNAL ASSOCIATION

Umbrella body for residents groups in the Redington Frogmal Conservation Area

31 August, 2016

Dear Mr. Peres da Costa,

2016/2997/P: 28 Redington Road – objection

We should like to seek a time extension for responding to this excessively lengthy planning application, which comprises:

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• Total	c. 1,000 pages

We are awaiting an expert report which has been commissioned by Redington Frogmal Association and are expecting this shortly. In the interim, we are submitting our objection with preliminary comments, in case the deadline extension is not granted.

Demolition

Redington Frogmal Association is greatly concerned by this proposal to destroy another of the Conservation Area's heritage assets, which forms a positive contribution to Sub Area Four. The area has been designated a Conservation Area on account of its Edwardian Arts and Crafts buildings, which are absolutely central to the streetscape and to the Area's history.

The house, formerly known as Danehurst, was commissioned by John Arthur Fallows, Church of England clergyman and Independent Labour Party politician. The developer's Heritage Statement incorrectly asserts that it is "an average and pedestrian design". As seen from the photos below, Danehurst bears a striking similarity to Garth



House, a Grade II* listed Arts and Crafts house in Edgbaston by William Henry Bidlake, one of the UK's most important architects.

The description below by Historic England of Garth House might equally be applied to Danehurst,

“An irregular composition essentially L-shaped in plan with a brick tower-like erection at the angle and a stable yard ranging behind the small arm of the L. In a Tudor style much influenced by the Arts and Crafts Movement. Partly of 2, partly of 3 and partly of 4 storeys. Ground floor of red brick in English bond; first floor roughcast, minimum stone dressings; slate roof. All windows have leaded lights and wood mullions and some have transoms as well. Good metalwork in door hinges, window latches and rainwater heads. Entrance (north-west) front is distinguished by a pair of tall brick chimneys linked together at the top, a projecting gabled bay in which there is a single window high up a capacious wooden porch and a row of small windows tucked under the cill eaves.”

Garth House, Edgbaston: Grade II* **Danehurst, 28 Redington Road, Hampstead**



Harriet Devlin MBE, MA (Cantab), Course Leader of Birmingham City University's MA in Conservation of the Historic Environment, confirms the similarity between Garth House and Danehurst and advises¹,

“28 Redington Road does appear to be a most important intact Arts and Craft house and I am very surprised that it is not statutorily protected or even on a Local List”.

¹ Email of 30 August 2016



In recent years, Danehurst has unfortunately been painted in yellow. Nevertheless,

“In its present form, 28 Redington Road stands on its own as a **positive contributor** to the Conservation Area. By restoring the façade, the building would become a **very positive contributor**.”²

Danehurst can be easily and inexpensively restored to its former glory by simply removing the yellow paint from the rough-cast render, sandblasting the stone work and stripping the green paint from the oak garage doors and service door. The 1935 extension to the left (north of the building) should ideally be removed to open up a gap between numbers 28 and 30 and restore the view to the rear garden.

Replacement building

The design of the proposed replacement building, by contrast, is a banal copy of the Arts and Crafts style, which deprives the Conservation Area of a genuine Arts and Crafts building of very high architectural merit.

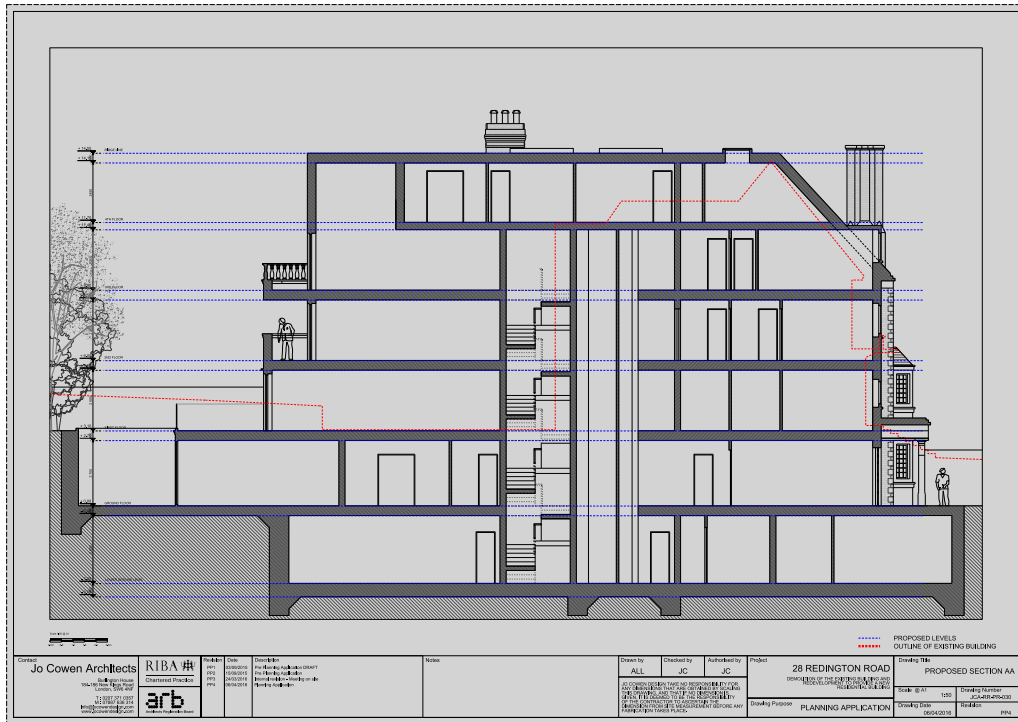
The replacement fails to observe many stipulations of the Redington Froggnal Conservation Area Statement, including the requirement to leave a gap between it and its neighbours and the width of the planned replacement must be reduced on both the north and south sides, in order to leave gaps to enable the rear garden to be visible from the street.

The replacement building is excessively large in relation to its plot, as seen from the drawing below, and extends too far into the rear garden, with an unacceptable level of rear garden extensions (in addition to the side garden building).

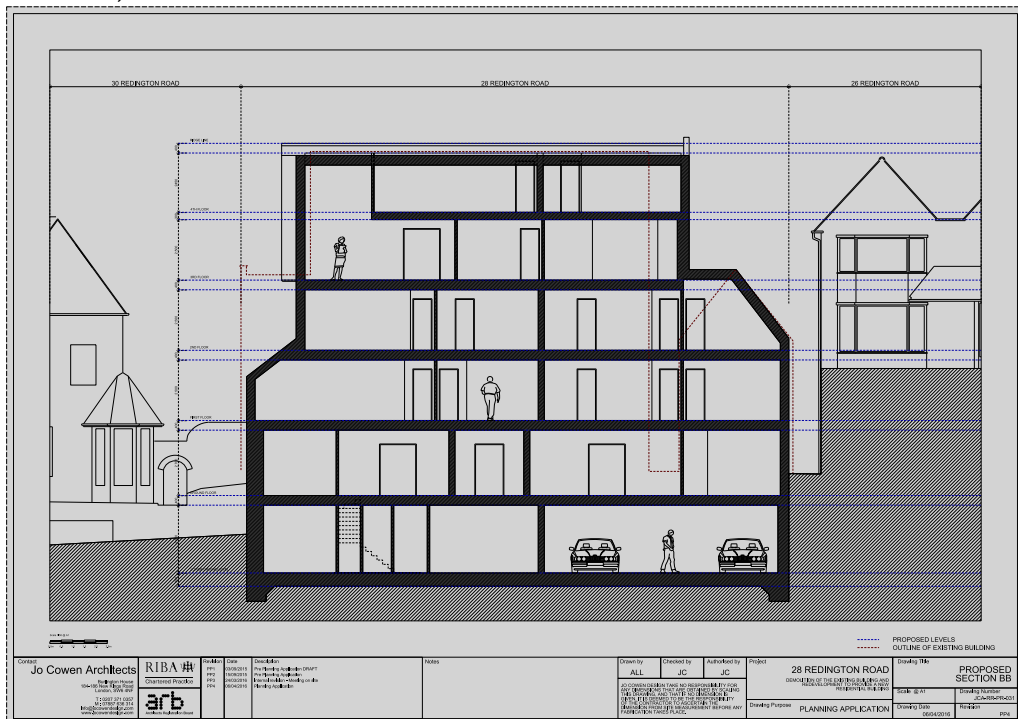
² Dr. Andrew Dutton Parish, MA, architectural historian and former adviser to English Heritage



New Six-Storey Building Outline Superimposed on Existing Building Outline (Dotted Red Line)



New Six-Storey Building Section Superimposed on Existing Building Section (Dotted Red Line)





The proposed replacement building will be almost twice as large (188%) and is a gross over-development of the site.

RF 33 of the Redington Froggnal Conservation Statement and Guidelines notes the importance of gaps between buildings, in order to afford views to rear mature gardens. The replacement building fails to provide a gap between it and either neighbour (26 and 30).

The inclusion of light wells in the design will introduce harmful and unwelcome artificial light into this important rear garden corridor.

Tree felling

It is intended to fell as many as eight mature trees, including a Scots Pine, Beech, Silver Birch, Horse Chestnut and Sycamore. The fellings are planned to facilitate the new development. Where a small amount of decay has been found to be present, for example in one of the cherry trees and in the beech tree, this further enhances the value of the tree to biodiversity and provides no justification for felling: indeed, it is noted that the beech is to be felled to make way for development.

Redington Froggnal Association is seeking to enhance the area's biodiversity and is utterly opposed to any felling of mature native trees which support lichens and insects in this very important rear garden tree corridor. Bats and owls depend on such trees for foraging. A bat monitoring report commissioned from Dr. Greg Carson of the Ecology Network affirms the importance of these rear garden corridors and their mature trees, for a number of bat species. The bat recordings for this tree corridor are attached.

The arboricultural report notes the presence of three veteran trees at the site (2 oaks and an ash), and a

"preponderance of early mature and mature trees on the site with a few young, semi-mature, post-mature and veteran trees in the population".

In addition to the felling of as many as eight of these mature trees – almost all to "facilitate" development – it is quite clear that the intended construction work will greatly endanger other mature and veteran trees, through invasive piling techniques and cutting back roots. Given that this is a site with a high biodiversity value, in an environmentally sensitive area, Redington Froggnal Association requests that a **Phase I Habitat Survey** is undertaken, prior to the determination of this planning application.

Replacement planting

The replacement planting envisaged by the landscape architects, to compensate for the felling of at least eight mature trees with a high biodiversity value, is entirely inadequate and includes non-native ornamental trees and shrubs, which will not be capable of supporting insect species needed for bats and owls. A few token bat boxes will be of no use whatsoever, if mature trees providing foraging habitat are felled!



Car parking

We object to the use of precious residential accommodation for car parking and consider that the development should be car-free, particularly as the building is in close proximity to the bus routes on Finchley Road and the planned CS11 Cycle Superhighway. We note that the Transport report omits any mention of TfL's Cycle Superhighway 11.

Basement excavation and surface water flooding

One of the most alarming aspects of the application is the proposal for a double basement and the amount of excavation that this will entail. This will have very serious risks of ground moving and underground water changes, either of which could cause considerable damage to the area. Redington Froggnal Association has studied the geotechnical reports by Dr. Michael de Freitas and Eldred Geotechnics. From these, it is clear that the applicant's Basement Impact Survey, is both inadequate, failing to address topics required by Camden policy, and factually inaccurate.

The excavation work will additionally have an adverse impact on soil stability in an area with many underground rivers (Arup / Redfrog Sub Surface Water Features Mapping, April 2016), with soils which become waterlogged and are prone to subsidence and heave.

We do not think the assertion in the BIA Audit that the site is not in an area of surface water flooding is correct. We are aware of a prolonged flooding incident at 28 Redington Road during 2015.

The proposals are contrary to the following Camden Core Strategies and Development Policies and Redington Froggnal Conservation Area Guidelines:

CS: 5.7, 6.39, 14.11, 14.12, 14.19, 15.17, 15.19

DP: 19.7, 19.8, 22.15, 22.16, 24.13, 24.19, 24.21, 25.4, 25.5, 25.8

RF 4, RF 13, RF 33, RF 35.

We should appreciate Camden's support in our attempts to preserve this Conservation Area, in the face of speculative development, which fails to both **"preserve or enhance"**.

In the event that Camden rejects this application, and the developer decides to appeal, our Association will fight this vigorously. We cannot allow heritage assets, which make a positive contribution to our Conservation Area, to be destroyed.

Yours sincerely,

Nancy Mayo

Secretary

Redington Froggnal Association

<http://www.redfrogghampstead.org>