



FRG/X/DA/04
19 January 2017

115 FROGNAL, LONDON NW3 6XR

Response to P.P.S. letter (ref.PW/GH/063431) dated 28 October 2016 in objection to applicant's original planning application.

As we have noted in the Addendum Planning and Design Statement (reference FRG/X/DA/03), our scheme submitted on 19.01.17 has been modified as a result of comments received by Camden on 02.12.16.

We appreciate that these comments may have been partly shaped by remarks received from objectors to the scheme. In order to address the particular items raised in the above mentioned letter from P.P.S, we respond as follows (page numbers as P.P.S. letter) and how our modified scheme has addressed those concerns:

Page 1:

Final paragraph

"It is noted that as part of the pre-application advice..."

- The advice received from Camden in that email was for the first of the three pre-application designs we presented to Camden, the design that was subsequently submitted at planning stage (which was the fourth design we presented to Camden, prior to its submission) had evolved following Camden's comments and steerage through the pre-application stage. Camden's advice mentioned in that email does not refer to the final design that was submitted to Camden.

Page 2:

First paragraph

"In a similar vein the supporting text to Policy DP25..."

- The other points in DP25 include the following items which we addressed:
DP25 (a) – these documents have been provided and they all demonstrate that the conservation area would be maintained.
DP25 (b) – our development conserves and enhances the character and appearance of the Redington and Frogнал Conservation Area.

DP25 (c) – refers to the prevention of the demolition of unlisted buildings that make a positive contribution, the existing building is deemed to be neutral so therefore this is not applicable.

DP25 (d) – not relevant.

DP25 (e) – trees are being replaced, garden is being replanted.

- The proposed development would make a significantly positive contribution when measured against DP25 (Conserving Camden’s heritage). In addition, they also make a significant positive contribution when measured with other Camden development policies, such as DP6 (Lifetime Homes), DP19 (Impact of parking), DP22, (sustainable design and construction), DP23 (Water), DP24 (High quality design), DP26 (impact on occupiers and neighbours) and DP29 (Improving access).

Page 3:

First paragraph

“Having thought further about the application site...”

- This is not correct, that the replacement building has to be a piece of *“exceptional contemporary architecture or a conservative and highly contextual house”*. This only refers to buildings that are deemed to make a positive contribution, not neutral buildings. While we believe this new house to be exceptional, it only has to maintain the status quo in terms of any perceived contribution to the conservation area. This point has been made very clearly in KH Heritage’s Heritage Statement that accompanied the original planning application.

Second paragraph

“Currently, the existing house...”

- The front garden is currently open to the adjacent streets, there is no barrier except a single chain on the ground around the perimeter. Our proposal for a hedge in front of a 1.5m metal railing would not detract from the appearance of the Conservation Area and the DRP are in agreement. The *“woodland glade”* that exists is only along Frognaal and even that has a 1.8m timber fence along Frognaal, even the allotments on the north side of the property are completely obscured from the surrounding streets.
- The site is only open because there are 7 streets all converging on the north corner of this site (Lower Terrace, Frognaal Rise, Frognaal, Oak Hill Way and Branch Hill, as well as the 2 private roads on either side of the site). While it is an open site, it is a stretch to call it a picturesque *“woodland glade”*, there just happen to be mature trees along the sides of these streets. The proposal includes the planting of new trees.

Fifth paragraph

"It would be unreasonable to suggest..."

- This new house has never been described as *"conservative and highly contextual"*, this was a description by Camden of traditional-looking architecture. The house does respond to the local context with regards to scale, proportion, material, topography, location, siting, sensitivity and history. The context that is referred to is the mixture of various styles and periods, there are Georgian and neo-Georgian houses in the area, but there are also modernist, arts & crafts, contemporary and Victorian houses that are as equally represented and these together form the local context.

Final paragraph

"The proposal disregards the identified open character of the site..."

- Our proposal addresses this comment by omitting the Study and first floor Gymnasium.
- The position of the development occupies a similar building line along the street as the house that is there currently, it would not therefore reduce the apparent openness of the site. The main part of the new house is also as wide as the existing house.

Page 4

"Overdevelopment of the site"

- We have included a study of four similar developments in the immediate vicinity (refer to drawing FRG-P2-004), comparing their scale to this application. Our site is not overdeveloped when comparisons are drawn.

Page 5 and 6:

"Loss of Mature trees"

- The project arboriculturist (Patrick Stileman) has discussed this matter with Camden's tree officer (Nick Bell) and this is what Patrick reported:

"I discussed the lime tree on the telephone with the council's tree officer; however I did not meet him on site. I explained to him that the tree's stability is compromised by a degrading buttress root which has decay consistent with that caused by the soft rot fungus Kretzschmaria deusta. I explained to him that in my opinion retention of the tree is defensible only if it is very heavily reduced (topped) which would leave it looking very poor, and still with a short likely retention span given the basal decay. I told him that in my opinion the sensible approach is for the tree's replacement and that a large tree could be conditioned to ensure continued amenity."

- The removal of the tree is not “*simply to provide parking at the side of the house*”, the proposal to put the parking at the side of the house only came about when it was reported by Patrick that this tree was decaying and a replacement tree in a similar location would be possible.

Page 6:

“New driveway from the lane”.

- The current location of the car parking is on a visually prominent (and sloping) asphalt driveway leading to the Garage, it is also uncharacteristic of the Conservation area. Locating the parking on the side of the house significantly improves the visual area of this prominent site and is level which is more practical to getting in and out of a car. The existing driveway also provides a situation where anyone leaving the car is vulnerable to being attacked. The new driveway would be accessed directly off our clients own property, through which the houses from no 105 to 111 have vehicular and pedestrian access. Drivers need to be careful along this private gravel road (it is a cul-de-sac) as it is also used by pedestrians and dog-walkers.

Page 6, 7, 8, 9 and 10 :

“Harm to residential amenity of No. 113”.

- The development would be on the North side of the neighbour’s house, their main aspect of the neighbour house is towards the east and west.
- The daylight and sunlight report that was carried out demonstrated that the new house was in compliance with BRE guidelines.
- The windows and door on the 113 house that are referred to are not relevant (in our understanding) as they face west and not towards the proposed new house. In addition, the door that is referred to has no windows, it does not provide any natural light, even if this door is the one that is predominantly used.
- The first floor of the south wing of the new house is as similar distance from the boundary as the neighbours first floor is from the same boundary. In the spirit of good neighbourliness and to address concerns raised, the Study is being omitted from the proposal for the new house, thereby eliminating concerns of bulk and proximity.

Page 10

“Overlooking”

- The location of the first floor windows are in a similar plane to that of the existing house. The window from the gymnasium is being omitted in the new proposal (as is the entire first floor gymnasium). The neighbours first and second floor north-facing windows are about 5m from the common boundary, they are overlooking our clients garden and house in a significant manner. Our south-facing first floor windows are almost 12m from the common boundary, their objection is unreasonable given their own situation.

Page 11

“Conclusion”

- A house that is deemed to be neutral and *“does not detract”* from the Conservation Area can be demolished as long as its replacement is deemed to maintain the status quo. While we believe the new house to be exemplary, it does not need to *“appreciably enhance”* the Conservation Area.
- The plot would no longer be *“filled”* as our modified planning application (submitted 19.01.17) omits the Study and first floor gymnasium above the garage.
- The scale and mass of the development are further reduced by modifications described in the submitted drawings.

end