

Dear Mr. Benmbarek,

Apologies for this late submission which we hope can nonetheless assist officers and be taken into account. Very busy before Christmas apart from our meeting and its prep,, I was unwell for the past two weeks with the need to keep matters rolling as much as possible on all fronts.

1. HCAAC Objects to the proposed demolition of a major part of this single house. The general massing of the whole forms a positive contributor whose more recent modern elements might be successfully modified although their effect is not detrimental to the whole composition. The present state should not be compromised, originally designed and modified as one building, maintaining the existing composition and interest, not to be regarded as a semi-detached pair.
2. We see that the pre-app discussion as reported by the Applicant appears to have accepted the principle of demolition, although the pre-app report did not include reference to such a drastic measure.. As pre-apps are supposed not guarantee likely consent, we submit the necessity to reconsider the stated acceptance of demolition, especially as demolition of heritage buildings or part are to be resisted according to the emerging Refrog Neighbourhood plan.
3. The criterion allowing for consideration of any demolition is substantial public benefit; such does not appear to be afforded by this proposal other than in CIL money. In heritage terms, the proposal is not beneficial, offering a bland replication of existing form and reduced detail against the visible character of the existing front details.
4. The roof ridge line and roof slopes are shared by this and the neighbouring building as seen from the frontage. The present state of building fabric should be retained and sustained. not demolished nor rebuilt in pastiche replica.
5. The property might benefit from demolition of the stated structurally at risk rear extension with the hope of an improved replacement bearing in mind the strident quality of the existing design and opportunity to update its planning and environmental performance.

To deal with the details of the proposal -

6. A replacement building located hard to the south boundary is unacceptable as closing the essential gap between buildings affording views of rear foliage (trees) an essential characteristic of the Redington Froggnal area.
7. Windows set within the original chimney stack were rightly queried in the pre-app and the reasoning of layout necessity should not override the basic intention and function of chimneys which also have a useful future function at least in ventilation. We would expect the point perhaps to be made under restrictions imposed by the existing internal planning. Wholly new planning within the existing shell and extension should well afford avoidance of this unwelcome detail, perhaps as simply as by reversing the stair orientation across the building width. The Applicant pleads tightness of planning

as the reason for non-agreement with the pre-app request while seeking to double the total internal floor area. Moreover the stair might be top-lit rather than forcing the fenestration as proposed.

8. The Applicant is concerned about the limitations of the existing concrete floors and structure in any new planning, but it is always possible to change floor structures incrementally during construction for any modified layouts required.
9. There is proposed substantial reduction (40 sq.m) of rear garden green landscaping and apparently an equal increase in hard landscaping, which swap must be unacceptable. We would ask for re-balancing of this adverse result.
10. The proposal also doubles the gross internal floor area whose footprint entails arguably unnecessary rear garden take-up. That this massive increase is for an existing occupier suggests careful reconsideration.
11. The Applicant regards the existing main building as 'unfit for purpose' environmentally. All heritage buildings pose similar problems and will need to be fitted carefully to upgrade their performance. It is not a justification for demolition. The statement of "built to poor standards" is not evidenced but conflated with stated poor internal alterations which are reversible. There appears the oft-repeated statement of low architectural quality which we submit is both unproven and not evident in this whole building as a positive contributor
12. Applicant's DAS point 3.3.1 appears to be in contradiction of the definite desirability of sustaining a viable composition of the whole building not trying to produce a semi-detached statement at all. The statement proposes an 'identity' of the designed front, whereas what is offered is a nondescript plain copy of a Victorian not A&C bay rendering the front characterless compared with the existing. Conservation area designs are to offer more of character than here, especially considering the effort and expense proposed in enlargement of the accommodation. DAS para 3.3.5 is similarly disputed
13. The sustainability/environmental aims of the proposal seem in doubt, requiring detailed development post-consent as assumed by the DAS. The aim for 12% reduction in carbon emissions seems unambitious in the current aspirational context. The measures listed as proposed to achieve this together with wall and roof insulations can be equally well applied to the existing building.
14. The Heritage Statement suggests the existing building of 58a is out of character with the general buildings and setting, whereas the over-riding 'out-of-character' element is the wide open front forecourt bereft of any planting. The property can be ameliorated simply by reversing this unwelcome intrusion in the street and surroundings. "The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions." The anodine front elevation of the proposal defeats this aim even compared with the existing.
15. The simplistic and debased proposed front elevation remind one more of a developer's aim of 'keeping-in-keeping', not of an occupier seeking a property of uniqueness and character of which to be proud and whose visual amenity and strong contribution to the area reflect those of finer heritage buildings, seen to justify the effort and commitment involved. The design quality here is not high as envisaged in policy and SPGs.



