

REDINGTON FROGNAL
NEIGHBOURHOOD FORUM

31 May 2020

Dear Mr. Peres da Costa,

7 Rosecroft Avenue - 2020/1409/P: objection

Under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as Amended, it is important to understand the central contribution of the amalgam of rear gardens and trees to the Conservation Area character.

The main dwelling comprises six flats and the proposed garden development does not qualify as permitted development. The application is for a large rear garden building of 10 metres in length, which will consume a significant portion of the garden, which already has a number of other outbuildings. By allowing direct access to the proposed garden building, the building will no longer be supplementary to the host building, but a separate building, likely to become an independent dwelling.

We are puzzled by the motive for seeking an indoor climbing wall, which is effectively the height of a two-storey building. This seems entirely inappropriate for the quiet sylvan quality of the Conservation Area and will cause loss of amenity due to noise in neighbouring gardens.

The impact of the development on trees within the site and on neighbouring trees is causing considerable concern, as the proposed building encroaches on a number of tree root protection zones (including of neighbours' trees). The arboricultural assessment does not map the trees in neighbouring gardens and fails to consider root protection areas for these trees.

The proposed felling of any trees is particularly objectionable on the grounds that they,
“will cause future heavy shade within this area of the garden if incorporated within the proposed development”

We dispute the “low” landscape values attributed to G1 beech hedge and T5 holly tree. Both are key to the character of the Conservation Area (as well as biodiversity).

The large windows and rooflight will create harmful light pollution beneath the important rear garden tree corridor where bats and other wildlife commute and forage.

The Redington Frogna! Neighbourhood Plan is with Camden’s legal department for the Regulation 16 consultation and therefore carries some weight. The application is not compliant with the Plan’s policies for Sustainable Development:

SD 1:

- i. Development must have no adverse impact on biodiversity and wildlife habitat, including through loss of garden space.
- ii. If there is likely to be an adverse impact, this must be offset by gains elsewhere within the site, such as tree and hedge planting.
- iii. The achievement of a net gain in biodiversity is strongly encouraged
- iv. The creation of garden development and building extensions must be in accordance Policies SD 2 to SD 5, and maximise the area of soft, natural landscaping, to act as a carbon sink and help mitigate against climate change and the urban heat island effect

SD 4:

- i. The area of soft natural garden space within the site should be maintained or increased.
- vi. Development that incorporates eaves and spaces for internal bat roosts, and the use of bird bricks and other features to support wildlife, will be particularly welcomed.

SD 5:

iii Extension into garden space, including outbuildings, must involve no significant reduction in the overall area of natural soft surface and have no significant adverse impact on the amenity, biodiversity and ecological value within the site.

The policies relating to Biodiversity and Green Infrastructure are also relevant:

BGI 1:

Open/unbuilt areas within development sites must be designed to enhance their ecological, wildlife and residential amenity values. This includes:

- i. retaining, providing and reinstating trees, hedgerows and other planting using native species, especially those of high value to biodiversity, as set out in the 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character. A very high urban greening score is encouraged;
- ii. maximising the area of soft landscaping and using planting with high value to pollinators and insects, as set out in the 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character;

If the application is granted, we should appreciate conditions relating to the continuing retention of all trees and hedges, that no harm is caused to trees in neighbouring gardens and to ensure that the building does not become an independent dwelling, eg au pair annexe.

Yours sincerely,

Secretary

Redington Frogmal Neighbourhood Forum

<http://www.redfrogforum.org>