

## Context

I wish to emphasise that I did not apply for planning permission before constructing the frame because I did not believe that permission would be needed. This may have been naïve but there was no malign intention to bypass the normal approval process. Nonetheless, we considered design carefully, including its setting in the neighbourhood, as anyone who takes pride in their property and their neighbourhood would do.

## Main issue

The Delegated Report emphasises the guidelines from Camden Planning Guidance (CPG) and the Camden Local Plan (CLP) regarding respect for local character and protecting heritage assets. These are indeed important priorities.

However, the Delegated Officer has not considered the planning authorities' ambitions regarding greening, biodiversity and improving the quality of outside spaces. The space's use as a roof garden should be taken fully into account.

The nature of a roof garden is that exposure to wind and lack of soil depth mean that additional structure is required for substantial planting to resist the weather. If the roof space is to contribute to the ambitions of greening and biodiversity, then the practical needs of plants, such as support at an exposed level, must be considered.

On the other hand, we argue that the alleged harm to the streetscape is minimal.

## Greening ambitions run through all the relevant planning guidance

**The frame supplements existing roof level planting by providing necessary structure for climbing plants.** It currently supports two climbing roses, an evergreen clematis, two evergreen jasmine and three wisteria. All these plants are now semi-mature and within two to three years should cover the frame entirely.

**Camden Local Policy (CLP) design policies D1 and D2.** The frame respects the intentions of CLP Policy D1, parts (a), (f), (h), (j), (l) and especially (k) (*'maximises opportunities for greening for example through planting of trees and other soft landscaping'*). The frame is not in conflict with any of the remaining priorities set out in Policy D1.

**Open space as an amenity to be cultivated.** Our efforts to ensure our roof supports as much greenery as it can is supported by many of the intentions set out in the CLP Policy A2, not least 6.31 which reads, *'Quiet areas of green space can enhance personal wellbeing and play space is an important tool in supporting the development of children and young people.'* Excessive restriction to the use of the roof space as a garden, rather than merely 'space', also runs contrary to the sentiment of CLP 7.23 on amenity space.

**Biodiversity to be encouraged where possible.** CLP Policy A3 Biodiversity states that *'The Council will protect, and seek to secure additional, trees and vegetation.'*, while subsection (m) goes on to say that *'[The Council will] expect developments to incorporate additional trees and vegetation wherever possible.'*

**Green roofs and walls explicitly include climbers requiring support.** We believe that our effort to improve the greenery supported on our roof is in keeping with the spirit of CLP 7.22 on landscape design and greening, and the intention to encourage *'bio-diverse roofs'* (CLP Policy CC2 and

paragraph 8.37). See also paragraph 10.8(5) of the CPG (Sustainability), which makes clear that climbers requiring support may be viewed positively as a form of green wall.

**Supplementary guidance on Design is also supportive.** CPG (Design) sets out further guidance on how the Council intends to apply the CLP policies D1 and D2 with respect to the sections highlighted above. The guidance on *Landscaping and green infrastructure* is supportive (paragraphs 4.5-4.17). The frame's simplicity also complies with the objectives of paragraph 4.23, that design should be '(1) Functional (2) Ecological and (3) Aesthetic'.

**The local and London strategies also support greening efforts.** The South Hampstead Conservation Area Management Strategy (SHCAMS) is concerned with recovering front gardens. While a roof garden is different, some of the rationale applied to front gardens clearly applies more generally, including the desire to encourage biodiversity and to preserve '*the attractive, tranquil character of the conservation area*' (paragraph 3.3). The London Plan (LP2016) Policies 5.10 and 5.11 press boroughs to encourage urban greening, biodiversity and use of accessible roof space. LP2016 section 8.2 sets '[to] increase urban greening' as a key performance indicator. The Intend to Publish London Plan 2019 goes further (3.6.8, 4.2.11, 8.5.1/2).

## **Design, local character and impact**

**Local character: South Hampstead is about gardens.** South Hampstead is an area of large gardens and mature trees. A number of the house fronts are adorned by climbing plants. There has been a roof garden at 70 Aberdare Gardens for over seven years, which is surrounded by substantial container planting on the all sides. This planting includes a number of maturing small trees which stand well above the roofline of the building.

**The frame and the plants it supports will not be confused as a part of the roof, but viewed as a natural part of the building's roof garden.** Climbing plants will cover the horizontal sections of the frame as they mature, becoming confused with the existing planting on the perimeter of the roof terrace when viewed from street level on Fairhazel gardens, and the larger trees at street level whose canopies stand above and frame the building itself. It must be considered that the frame will integrate with this other established greenery when evaluating the Delegated Officer's view that '*The addition of planting would only make the structure more visually dominant and incongruous.*'

**The frame does not add 'visual bulk' or confuse the roof line.** The SHCAMS expresses concern over '*altering roofscapes*' and developments that result in '*increased visual bulk to the roof*'. Camden's planning decision also highlights 4.2 of the CPG (Altering and Extending your Home). In this regard, frame is light in structure – it is not bulky, it clearly does not form a structural part of the roof, and the planting it supports will be viewed as an additional green element, not an 'addition' to the roof itself. The planting at roof level does not change the roof line, meanwhile. On the contrary, soft landscaping contrasts with roofing materials, highlighting the existing roofline.

As an aside, television aerials on surrounding buildings, which can be appreciated in Images 9-14, are often significantly taller than the frame under consideration, and unsightly. They bring no benefit to the heritage assets on which they are positioned, or any public benefit, but have not been challenged, presumably because they do provide a service to their users and do not add 'visual bulk' or change to rooflines.

**The design is not detrimental to conserving Heritage, but enhances that Heritage.** In relation to CLP policy D2 (Heritage), the harm the frame causes is hard to rationalise. Several sections of the policy highlight the importance of conserving greenery, including section D2(h). Paragraph 7.41 of the CLP,

meanwhile, reads that development should take *'opportunities to enhance, or better reveal the significance of heritage assets and their settings.'* Green roof space does precisely this by showing that heritage assets can be positively adapted to modern circumstances and priorities.

**Roofline. The frame is proportionate, hidden or sited away from the main elevations and integrated with surrounding green features.** The SHCAMS and CLP are concerned to limit development that spoils the roofline of terraced houses. In this regard, note that the effect of a constant roofline is mainly appreciated from Aberdare Gardens. However, the frame is sufficiently set back from the Aberdare Gardens elevation that it is not visible from street level (Images 7,8). From Fairhazel Gardens, the frame is partly visible from the South and East (Images 1-3), but from these perspectives a constant roofline is less of a feature. In any case, as the frame is at roof level, it will rarely be viewed from such close range by those walking or driving north on Fairhazel Gardens. For most of the year the rear of 70 Aberdare Gardens is also largely obscured by mature trees when approached from the South, as can be appreciated in Images 1-3. Regarding proportion, the frame will soon barely clear a line of Portuguese Laurel hedging on the Fairhazel Gardens elevation (Image 4). The frame is visible at longer perspectives from Fairhazel gardens to the North, but at such distance it appears small (Images 5,6) – far from 'visually dominant'. From all views the frame, where visible, appears well integrated and proportionate with other visible planting and surrounding trees, and it will do so all the more as the plants it supports mature.