

REDINGTON FROGNAL NEIGHBOURHOOD FORUM

20 February, 2022

Dear Mr. Hope,

Application 2021/6257/P, 14 Greenaway Gardens – objection

Demolition of a positive contributor

Both the Redington Froggnal Conservation Area Statement and Guidelines and the updated appraisal which is currently being consulted on, note that 4 Greenaway Gardens is a positive contributor to the Conservation Area. Similarly, section 6.1 of the Redington Froggnal Neighbourhood Plan notes that 14 Froggnal is a Non-Designated Heritage Asset and it is requested that this, and all other non-designated heritage assets, are adopted as part of Camden's Local List:

<https://www.redfrogforum.org/wp-content/uploads/2021/07/Complementary-Actions-to-Deliver-the-Neighbourhood-Plan.pdf>

Demolition is contrary to the London Plan policy SI 2, which requires development to be net zero-carbon, and to Camden's Local Plan policy CC1 and the promotion of zero carbon development (operational carbon and embodied carbon). Construction of the proposed basement will involve copious amounts of concrete, yet no assessment of carbon emissions has been provided. The proposal for air conditioning and associated plant is not compliant with policy CC2 and, instead, natural cooling plans should be adopted, eg through tree planting.

New replacement building and basement

The proposed replacement building would have a significantly larger footprint, and the basement footprint would therefore be commensurately larger than that of the existing house, contrary to Camden Local Plan policy. As it is effectively a new dwelling, it should be car-free in line with Camden policy.

The proposals will enhance neither the setting of the non-designated heritage asset, nor of the garden suburb Conservation Area. Indeed, they do not comply with most of the policies in the Redington Froggnal Neighbourhood Plan and hard surface will be increased while garden space will be lost to the enlarged replacement building.

Specific policies, with which the proposals do not comply, include;

SD 1 i, ii, iii, v, vii

SD 2

SD 4 vii, viii, xii,

SD 5 iii,

BGI 1 i – vii

BGI 2 i – iv. The silver birch (tree 67) should not be felled to facilitate the development

UD 1 – iii. A minimum soil depth of 2-3 metres is required above basements and light wells are inappropriate to the Conservation Area's garden suburb character. It should be noted that a tributary to the Cannon Stream arises in or near to the rear garden of 10 Greenaway Gardens.

Failure to enhance garden suburb character and biodiversity

The various supporting documents do not address the special importance of the Conservation Area's garden suburb features, including trees, landscape and well-vegetated gardens (sections 4.4, 4.8, 4.10 of the Neighbourhood Plan). Landscaping details should be provided for both the front and rear gardens, along with the biodiversity gain and how this is to be achieved. Guidance for planting to enhance biodiversity and Conservation Area character is available at section 6.2 of the Neighbourhood Plan.

Yours sincerely,



Secretary

Redington Frogmal Neighbourhood Forum

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