

**REDINGTON FROGNAL**  
NEIGHBOURHOOD FORUM

November 6, 2022

Dear Ms Dawson,

**13B West Heath Road: 2022/2250/P and 2022/481/L - objection**

Thank you for the opportunity to comment on the above planning application.

The Redington Frognal Neighbourhood Forum (RFNF) objects to the erection of a wooden garden summerhouse at this site because the applicant has failed to take into account the importance of the property, its garden and has therefore under-estimated the possible adverse impact of the proposed development.

In the introduction of the Planning Statement provided by Norton Taylor Nunn Ltd it is claimed that

1.3 .... the site is not situated within designated areas like a Conservation Area, an Area of Outstanding Natural Beauty, or others.

In point of fact, 13b West Heath Road which is itself a listed building, falls squarely within the very important Redington Frognal Conservation Area. Moreover, its garden is part of the Local Ecological Network, the purpose for which is *"to restore ecological networks and to provide potential foraging, roosting and nesting site. New development in gardens should take the opportunity to strengthen existing green infrastructure and wildlife habitat, and reinforce the protection of gardens and green spaces, above and beyond that afforded by Camden Local Plan Policies."*

We consider this oversight most unfortunate. Application 2022/2250/P *must* be assessed in the context of its importance to the Redington Frognal Conservation Area. It is also regrettable that Norton Taylor Nunn Ltd offered no mitigation to the proposed summerhouse. This should be a *sine qua non* for the garden of a Listed Building within a Local Ecological Network.

May we draw your attention to the following:

- RF1 of the 2003 Redington Frognal Conservation Area Statement and Guidelines which states that "Rear gardens contribute to the townscape of the Conservation Area and provide a significant amenity to residents and a habitat for wildlife. Development within gardens is likely to be unacceptable. "
- The Redington Frognal Neighbourhood Plan (RFNP) adopted in September 2021 after exhaustive consultation which provides ".... additional clarity and guidance for applications and decision makers on how the special architectural interest and historic interest of the Redington Frognal Conservation Area (RFCA) can be protected: this Plan should be read alongside Camden Council's Redington Frognal Conservation Area Character Appraisal and Management Plan." (BGI Gardens and Ecology 4.13)

- was developed in part, to prevent a conurbation of rear garden buildings and to prevent further garden losses (SD 5 Extensions and Garden Development)

Also within the RFNP we refer you to the following important policies which enhance the setting of a listed building

#### **SD1**

- i Development should avoid adverse impacts on biodiversity and wild life habitat including through loss of garden space
- ii If there is likely to be a significant adverse impact, this should 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
- vii Use of hedges as front, side and rear garden boundaries is encouraged to enhance amenity, biodiversity and streetscapes

#### **SD4**

- vii The area of soft natural garden space within the site *should be maintained or increased*
- viii Landscaping should be an integral part of the design and layout of development and should include trees and other planting using species with a high value to biodiversity
- xii 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

#### **SD5 Was developed in part, to prevent a conurbation of rear garden buildings and to prevent further garden losses by:**

- iii Extension into garden space, including outbuildings, should 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
- vii Hedges (front, side and rear) and front boundary walls, which contribute to the character and appearance of the Conservation Area should be retained

#### **BG1**

- i Retaining, providing and reinstating trees, hedgerows and other planting using species, especially those of high value to biodiversity, as set out in the 6.2 Planting Guidance to Enhance Biodiversity and Conservation Area Character
- ii Achieving an urban greening score in excess of the London Plan target
- iii 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.
- iv Minimising hard surface areas to those necessary for the functioning of the site, such as footpaths to doors, and ensuring they are permeable to allow drainage of surface water
- v Retaining hedges and walls and taking opportunities to use hedges as boundary treatments, instead of or in addition to walls and fences
- vii The inclusion of new water features, such as natural wildlife ponds

The introduction of a biodiverse roof on the summerhouse (NB not a green roof) which incorporates a minimum depth of 150mm and is planted with native wildflowers and

additional habitat, such as sand piles, logs etc. would further help to provide biodiverse habitat for insects

In conclusion, and as is well documented and approved, the principle of garden development is contrary both to the RFNP and RFCA Appraisal. Should Camden however be minded to make an exception and grant consent to this application, it must be accompanied by very substantial mitigation measures as set out in the Application sections of the relevant RFNP.

A green roof on its own will not provide sufficient mitigation, although a living roof, along with hedge planting and / or a natural wildlife pond could be suitable mitigation measures so that the development becomes compliant with the RFNP.

Yours sincerely

**Victoria Barclay**

Redington Frogna! Neighbourhood Forum

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