

REDINGTON FROGNAL
NEIGHBOURHOOD PLAN



Redington Frognal
Neighbourhood Plan

(Draft – November 2019)

x.x.x to 31.12.2045

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1.0 INTRODUCTION

1.1 ENABLING LEGISLATION

The Neighbourhood Plan has been written to meet the Basic Conditions, including:

- having regard to National Planning Policy Framework and Planning Practice Guidance,
- being in general conformity with the strategic policies in the Camden Local Plan, adopted on 3 July 2017,
- helping to achieve sustainable development
- not breaching EU obligations or human rights law.

Camden's Local Plan has proved open to interpretation by Camden officers and the Development Control Committee. Consistent with the wishes of Forum residents, the Redington Frognal Neighbourhood Plan sets out its own interpretation of these policies, in order to ensure that development policies are applied in such a way as to preserve and / or enhance the Plan Area, which is virtually synonymous with the Redington Frognal Conservation Area. A considerable body of evidence has been developed in support of the Neighbourhood Plan policies:

REDINGTON FROGNAL EVIDENCE BASE

The incorporation of a design policy aims to ensure that the Redington Frognal Conservation Area is not blighted by, in the words of Heath and Hampstead Society, “architecturally uninspiring, corporate looking development” of “luxury flats with double basement garages...”¹.

1.2 DEVELOPMENT OF THE REDINGTON FROGNAL NEIGHBOURHOOD FORUM

Frognal Association, the umbrella group for street representatives and tenants' associations in the Redington Frognal Conservation Area, began to consider developing a neighbourhood plan in 2014. The Neighbourhood Area and the Redington Frognal Neighbourhood Forum were formally designated by Camden on 5 September 2014 under the 2011 Localism Act.

1.3 DEVELOPMENT OF THE REDINGTON FROGNAL NEIGHBOURHOOD PLAN

Work commenced on Policy drafting in 2016, following the Vision and Objectives survey, which ran from April to December 2015 and attracted almost 100 responses from an Area of 2,000 households.

A first draft of the policies, informed by the Vision and Objectives survey, was presented to the Neighbourhood Forum at the June 2016 AGM. Policies were redrafted in the light of feedback generated from a public consultation in September 2016 and further revisions ensued, following advice from Camden officers and other professionals.

Policies are supported by a detailed **Evidence Base**, funded by Redington Frognal Association, government grants and funding allocations from the local element of the Community Infrastructure Levy (CIL). The Evidence Base is published on the Neighbourhood Forum website.

The draft Plan underwent a Health Check and Evidence Base Review by AECOM in July and August 2018, and feedback was also obtained from the Regulation 14 public consultation (from 28.10.18 to 23.1.19). Further drafting revisions were made as a result of both exercises. Input from statutory consultees led to the appointment by the Forum of Urban Vision Enterprise to facilitate the Plan's conclusion. A second Regulation 14 public consultation was undertaken, (from 24.6.19 to 5.8.19) as a result of revisions advised.

¹ This relates specifically to the New End Nurses' Home development, but may equally be applied to new developments in Redington Frognal (eg Redington Gardens and Redington Road):
https://www.heathandhampstead.org.uk/wp-content/plugins/hhs_pdf_parse/pdf/2018-05.pdf

Involvement of Professionals

Preparation of the neighbourhood plan would have been impossible without the involvement of professionals. We are grateful to many independent consultants but, particularly, to: Dave Chetwyn of Urban Vision Enterprise; AECOM; Create Streets; Dr. Adam Broadhead of Arup; Dr. Greg Carson of the Ecology Network; Danny Hyams of Ordnance Survey; Greenspace Information for Greater London; Hampstead Conservation Area Advisory Committee; Dr. Michael de Freitas and Dr. Christine Butenuth of First Steps; Trees Design Action Group and Paul McKenzie Studio. Very valuable assistance and advice has also been received from Frognal and Fitzjohn's ward councillors; Mr. Robin Lacey (artist and sculptor) and a large number of resident volunteers from both Hampstead and Redington Frognal Neighbourhood Forums.

The Forum wishes also to record its gratitude to Camden Council senior planners for extensive and detailed comments received on five drafts.

Community Infrastructure Levy funds were allocated by the Neighbourhood Forum to Camden at the beginning of 2018, in order for Camden to update its 2003 Redington Frognal Conservation Area Guidelines and Statement. The purpose of providing funding was to provide a current Conservation Area appraisal as evidence of need for the SD and BGI neighbourhood plan policies. By October 2019, the work had not been commissioned.

In the absence of an up-to-date Conservation Area appraisal, the Plan is reliant on the 2003 Redington Frognal Conservation Area Statement and Guidelines, the AECOM Redington Frognal Heritage and Character Assessment, dated September 2015, and evidence collected by Redington Frognal Association to support the case for the introduction of an Article 4 direction for much of its evidence relating to policies SD and BGI. These documents are found in the Evidence Base, numbered (1), (2), (12 ii), (131) and (132).

1.4 VISION AND OBJECTIVES

The Forum recognises that the area is likely to evolve over time as a result of changes to the climate, existing buildings, the occasional introduction of new buildings and careful and positive changes to the streetscape and public realm. However, certain aspects of the area are sensitive and successive individual changes may cumulatively erode its character.

The Neighbourhood Plan therefore aims to provide a clear framework for future development through a robust set of Policies. While being in general conformity with the strategic policies of the Local Plan, the Policies are also distinct to the Plan Area. They offer a vision of sustainable growth and development which is appropriate, strikes a balance between enabling growth to meet need, while ensuring that it takes account of the needs of future generations social, economic and environmental sustainability, and is supported by Forum residents.

We seek a future for the Neighbourhood which preserves its green character and serves as an area available to a wide range of family types and ages who live here rather than invest here. We believe that the Redington Frognal neighbourhood should celebrate its heritage and history and should continue to be a delightful area in which to stroll in and enjoy.

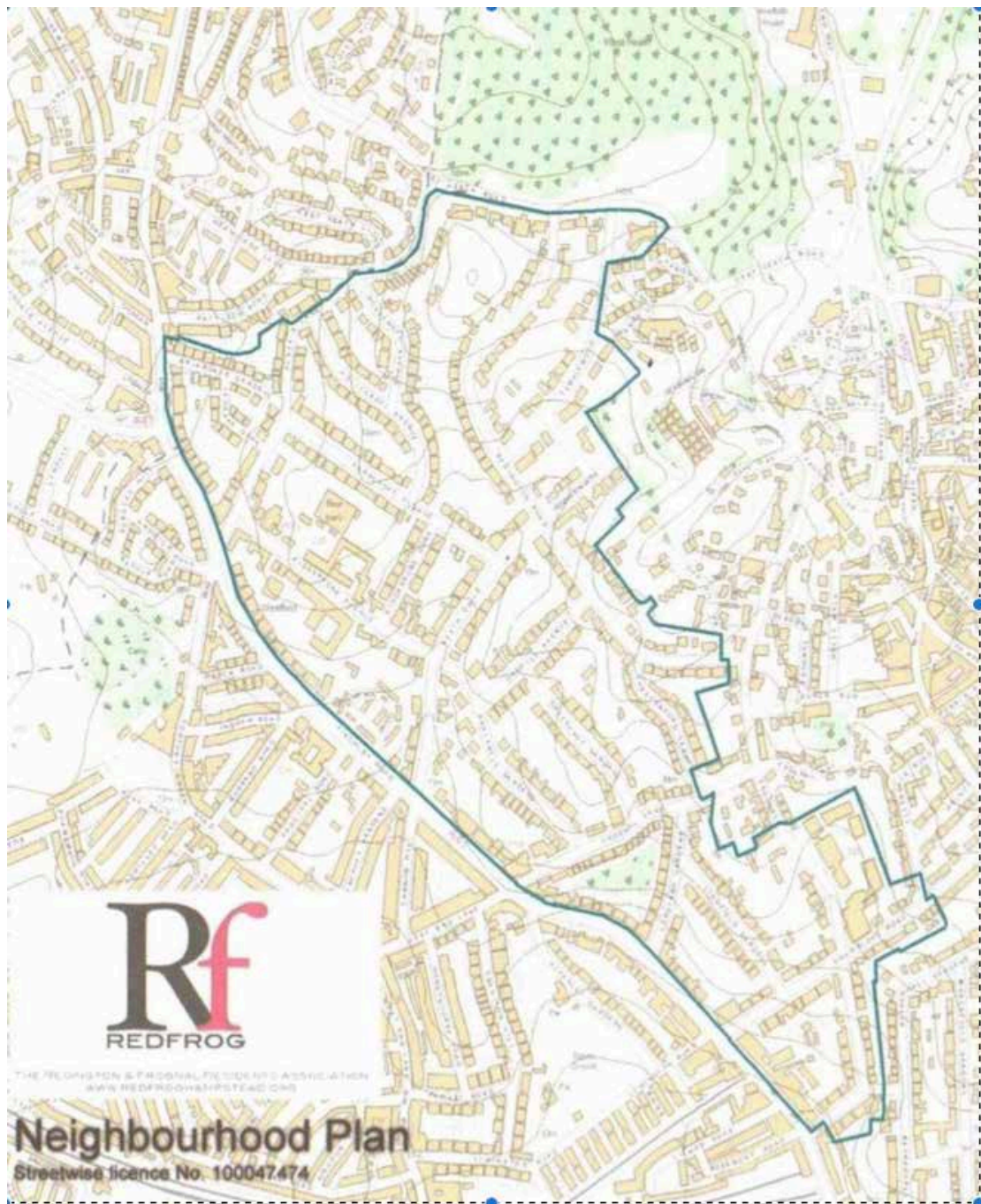
1.5 The Forum's Six Objectives

The Forum's six Objectives are:

1. to preserve and enhance the Redington Frognal characteristics as a picturesque Victorian and Edwardian suburb with a diverse population;
2. protecting and improving green space and biodiversity;
3. the enhancement of the Environment of Finchley Road;
4. identifying areas for growth of new homes, with community facilities to support home working;
5. maintaining and promoting the area as Centre for Tertiary Education the Arts and Culture;
6. basement excavation: ensuring that basement development does not impact local hydrology or cause damage to neighbouring properties.

The Vision and Objectives Statement and Survey are provided in the Evidence Base, and on the **Forum website** <http://www.redfrogforum.org>

Redington Frognal Neighbourhood Plan Area



1.5 COMMUNITY ENGAGEMENT

The Neighbourhood Forum have carried out extensive public engagement from establishing the Forum boundaries in March 2014, to seeking residents' feedback on planning issues of concern, to developing a Vision and Objectives on which to base a neighbourhood plan. Initial themes emerged and a survey was developed, which ran between February and March 2014 (Evidence base document (130) Neighbourhood Plan Objectives Survey April 2014) to gauge the degree of support. By 31.3.14, almost 100 responses had been received to the on-line survey. Respondents to the on-line survey were individually thanked and invited to join the Redington Frognal Neighbourhood Forum. The responses informed the Vision and Objectives brochure, and a more detailed survey followed. The Vision and Objectives Statement and Survey were formally launched at a public meeting on 15 March 2015, held at University College School. Flyers were hand-delivered through c. 2,000 letterboxes in time for the 15 March 2015 meeting. Laminated posters advertised the meeting on all lampposts.

Almost 50 residents and local businesses attended the discussion (with free wine and food) on 15 March 2014. The survey continued until December 2015 and generated 184 responses and very high support of 95% for the Vision and Objectives. These documents are presented as part of the evidence base (Evidence Base documents (130) Neighbourhood Plan Objectives Survey February-March 2014, (131) RedFrog Vision and Objectives Brochure and (132) Vision & Objectives Survey Data_All_151206). They are also hosted on the Neighbourhood Forum website at:

<http://www.redfrogforum.org/vision-and-objectives/>

As policies began to take shape, continuing feedback was sought at widely publicised AGMs, held in a variety of venues, through summer fetes and other community engagement and social events. The policies were refined and the evidence base developed. A Regulation 14 public consultation was launched on 28 October 2018, which ran until 23 January 2019. This resulted in feedback both from residents and statutory consultees, the latter leading to substantial editing and restructuring. The changes included the introduction of a new policy KR Kidderpore Reservoir, following advice received that the bid to protect Kidderpore Reservoir through Local Green Space designation was unlikely to succeed, the re-writing of the Design Codes as Guidance, and removing over prescription to better reflect the character of the Conservation Area.

In the light of these changes, a further Regulation 14 public consultation, with a lighter touch, ran between 24 June and 5 August 2019.

Significant revisions made as a result of the second Regulation 14 consultation were the:

- deletion of Finchley Road – a Healthy Street, as this concerned non-planning matters
- removal of the policy on Key Views, which would be unlikely to prove effective
- retitling of guidance document, Design and Landscape Guidance (formerly Design Codes, then Guidance Notes for Developers)
- downgrading of the policy for Aspirational Development Sites to Design Guidance for Possible Redevelopment Opportunities
- removal of the table setting out estimates of the potential number of deliverable housing units.

Further detail of the community engagement carried out is set out in the Consultation Statement, which is available on the Neighbourhood Forum website at:

<http://www.redfrogforum.org/accompanying-documents/>

SD SUSTAINABLE DESIGN AND REDINGTON FROGNAL CHARACTER

SD 1 REFURBISHMENT OF EXISTING BUILDING STOCK

2.1 RATIONALE AND EVIDENCE

The Plan area has many development constraints, including hydrogeological, an absence of community, social and health care infrastructure and a deficiency in open green space. Private residential gardens constitute an important ecological network in which one communal private garden² is designated as a Site of Importance or Nature Conservation.

For designated heritage assets, such as the Redington Frognal Conservation Area, paragraph 185 of the NPPF requires that local planning authorities should give great weight to the asset's conservation when considering the impact of proposed development on the significance of a designated heritage asset.

The Conservation Area status of the Plan Area, mostly comprising heritage housing stock (non-designated heritage assets and listed buildings), and the scarcity of available development sites, limits opportunities for new construction. Nevertheless, the Plan aims to accommodate part of the need for housing in the Frognal and Fitzjohn's ward, as projected by the GLA over the period to 2050.

The Neighbourhood Plan is written within the context of accommodating population growth, as set out in the Camden Local Plan. The Neighbourhood Plan provides detail to shape growth and ensure that it is sustainable. It does not make any site allocations of its own, but informally recognises potential redevelopment opportunities. The Forum believe that the Plan Area has no vacant or under-used sites, other than those identified within DS Possible Redevelopment Opportunities.

Growth is to be delivered through:

- change of use
- re-use / refurbishment
- redevelopment

in accordance with sustainable car-free design policies, which address the Plan area's "green and picturesque" Victorian and Edwardian suburb character, its verdant setting, hydrogeology and local amenity. Through adherence to these policies, growth will be provided for a variety of homes and jobs³.

This policy additionally aims, in accordance with the five principles of sustainable development, to help to ensure a "strong, healthy and just society" (paragraph 8 the National Planning Policy Framework). Natural Environment Guidance from MHCLG, published 21.7.19, emphasises the importance of green infrastructure, including private gardens, and for planning to consider biodiversity and wider environmental net gain (Paragraph: 021 Reference ID: 8-021-20190721). It also has regard to Part 6 of the Environment Bill, published 15.10.19, and Section 40 of the Natural Environment and Rural Communities Act 2006 (duty to conserve biodiversity), as currently being amended by the Environment Bill.

Support for the policy is provided by the following Evidence Base documents:

- (1) 2003 Redington Frognal Conservation Area Statement and Guidelines
- (2) AECOM Redington Frognal Heritage and Character Assessment, dated September 2015
- (3) National Planning Policy Framework, February 2019
- (4) Urban Greening Factor for London, The Ecology Consultancy
- (5) MHCLG National Design Guide
- (6) Population Profile for the Frognal & Fitzjohn's Ward, 2011
- (7) Natural Environment Guidance, MHCLG, 21.7.19
- (8) GLA Frognal and Fitzjohn's population projections
- (9) A Policy for Trees in Islington (paragraphs 28.5.3, 28.6.1, 28.7.2, 28.7.3, 28.9.2.
- (9 i) Islington Tree Policy 2019

² Formerly two private gardens were SINCS

³ Objective 4 of the Redington Frognal Vision and Objectives Brochure

- (9 ii) Policy G7 Trees and woodlands | Draft New London Plan
- (9 iii) RBKC Trees and Development
- (124) Natural Capital Committee Advice to government on net environmental gain, May 2019
- (125) GRaBS Expert Paper 6 the green space factor and the green points system

SD 1 REFURBISHMENT OF EXISTING HOUSING STOCK

Redevelopment or extensions to the existing building stock must include consideration of the following:

- i. All development must have no adverse impact on biodiversity and wildlife habitat.
- ii. The achievement of a net gain in biodiversity is encouraged⁴
- iii. If there is likely to be an adverse impact, this must be offset by gains elsewhere within the site, and evidence provided how the impact will be offset.
- iv. Where single houses have been sub-divided into flats, and where units are 20% or more below London Plan private internal space standards, they may be amalgamated to form fewer units, provided the reduction in units is no greater than necessary to meet the standards. This applies to all development of a site since 26 June 2006⁵, whether by different applicants or by the same applicant.
- v. The retention of existing and the creation of new 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. This will require the following:
 - maintain the Conservation Area's green and verdant character in accordance with or, if outside the Conservation Area, contribute substantial urban greening measures and increase the green cover of the Plan Area⁶
 - minimise losses to biodiversity and habitat capable of supporting biodiversity;
 - 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;
 - encourage / seek large tree and shrub planting
 - felling of existing trees and hedges, especially large species / canopy trees which support wildlife, will not be permitted for the purpose of facilitating development.
- vi. Rear garden boundaries will be required to include trees, such as those in the list shown in 9.2 Design and Landscape Guidance.
- vii. Front garden boundary walls and hedges are to be preserved or reinstated for new developments and refurbishments of existing building stock. Boundary treatments may not be breached for the purpose of facilitating off-street parking of vehicles.
- viii. The Plan strongly encourages the use of hedges (as in 9.2 Design and Landscape Guidance) as front, side and rear garden boundaries, to enhance amenity, biodiversity and streetscapes.

⁴ https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

⁵ This date has been advised by Camden. See <https://www.camden.gov.uk/web/guest/camden-planning-guidance>

⁶ An environmental objective – helping to improve biodiversity:
<https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development>

2.2 APPLICATION

To demonstrate compliance with the requirement for landscape design to be an integral part of the design, full landscaping details should be submitted with planning applications, including landscaping of front and back garden space.

Applicants should seek to achieve high urban greening scores in the RedFrog area recognising the wide range of urban greening opportunities likely to be achievable on many sites⁷. Applicants should set out plans for biodiversity net gain and demonstrate how this is to be achieved, referencing the GLA Urban Greening Factor for London⁷.

The local planning authority should consider conditioning planning applications to prevent erosion of character through replacing front gardens with hard-surfaced parking space and the hard surfacing of rear gardens.

Section 211 Notices of Intent should be refused, where felling is proposed to facilitate development. The impact of development on trees in the Conservation Area will be a material consideration of any planning application within reasonable proximity to a tree. Development including and subsidiary or enabling works that may result in damage or loss of a Preserved tree will be refused. In addition, unnecessary or excessive pruning works or root disturbance for foundation excavations that would be required to enable a development to be constructed will also be a material consideration in the assessment for planning approval or refusal⁸.

Refurbishment of the existing housing stock, which does not cause loss of soft surface or garden area, will be supported, if accompanied by biodiversity enhancing measures, such as tree and hedge planting, as specified in Policy BGI 1 (Application) and 9.2 Design and Landscape Guidance. Areas of soft natural surface can be increased by converting hard-surfaced garden areas to soft, natural surface.

New developments, including building extensions, are to conform to the Redington Froggnal Design policy, as set out in Policy SD 4 and 9.2 Design and Landscape Guidance.

Developers are encouraged to use Thames Water's free pre-planning service:

<https://www.thameswater.co.uk/preplanning>

This service can tell developers at an early stage if Thames Water will have capacity in its water and / or waste water networks to serve their development, or what Thames Water will do, if it does not. The developer can submit this as evidence to support a planning application and Thames Water can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.

⁷ https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

⁸ (9 iii) RBKC Trees and Development - see Appendix 2

SD 2 REDINGTON FROGNAL CONSERVATION AREA NON-DESIGNATED HERITAGE ASSETS

2.3 RATIONALE AND EVIDENCE

The Redington Frognal area has a rich social history and has been home to many notable residents, e.g. General de Gaulle and Tomas Mazaryk. It is also defined by fine Edwardian and Victorian architecture and notable post-War buildings by eminent architects, set in large gardens planted with mature trees and vegetation, which make a particularly strong contribution to the character of the area.

The Redington Frognal Conservation Area is a “heritage asset”⁸, comprised of listed buildings and non-designated heritage assets. Paragraph 197 of the NPPF requires that,

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

The NPPF requires that local planning authorities should take account of: the desirability of sustaining and enhancing heritage significance, putting assets to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities and economic vitality; and, the desirability for new development to make a positive contribution to local character and distinctiveness (paragraph 192).

The NPPF also notes in paragraphs 194-196 that planning applications causing “any harm to, or loss of the significance of a designated heritage asset”, or substantial harm, should be refused, “unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and;
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefits of bringing the site back into use.”

National Planning Practice Guidance notes, with respect to unlisted conservation area buildings that:

“If the building is important or integral to the character or appearance of the conservation area then its demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 133 1 of the National Planning Policy Framework.”

A list of the Redington Frognal Conservation Area’s non-designated heritage assets is provided in the 9.1 Non-Designated Heritage Assets for Local Listing. This is in accordance with MHCLG Historic Environment Guidance (updated 12 July 2019), which states.

“Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers.”

The loss of a non-designated heritage asset must be based on an assessment of harm to its significance and the contribution made to the significance of the designated heritage asset, ie the Redington Frognal Conservation Area.

Camden’s Redington Frognal Conservation Area Statement of 2003 had already noted a number of infill developments. Since then, infill development has accelerated and many properties have been demolished. Where properties have been demolished they are replaced by much larger properties and smaller gardens (as in Evidence Base document (20) Sustainable Development and Redington Frognal Character – recent harm) and a mixed assortment of architecture. The cumulative impact of this development is to erode the unique characteristics of the Redington Frognal Conservation Area and to harm the settings of historic buildings.

⁸ NPPF Annex 2: Glossary

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment-non-designated>

Recent new developments (eg in Redington Road, Redington Gardens and Finchley Road) lack detailing to the façades, fenestration and roofscapes. They may be without front gardens, side gardens, trees or hedges, and incorporate excessive hard surfacing.

This policy aims to preserve the Area's Victorian and Edwardian buildings, in addition to post 1930 buildings of high architectural merit, and their green settings.

Support for the policy is provided by:

- (1) 2003 Redington Frognal Conservation Area Statement and Guidelines
- (2) AECOM Redington Frognal Heritage and Character Assessment, dated September 2015
- (5) MHCLG National Design Guide
- (10) MHCLG Guidance Historic Environment
- (11) 28 Redington Road appeal decision 3164577
- (12 i) RedFrog Association Article 4 meetings with Camden, 2011, 2013
- (12 ii) Article 4 Direction presentation
- (20) Sustainable Development and Redington Frognal Character – recent harm
- (21) Neighbours' costs for 28 Redington Road
- (17) Communities across England encouraged to nominate heritage assets.
- (107) Environment Bill, 15.10.19.
- (132) Redington Frognal Vision and Objectives Survey (questions 1 and 2)

SD 2 REDINGTON FROGNAL CONSERVATION AREA NON-DESIGNATED HERITAGE ASSETS

New developments must preserve or enhance the character and appearance of the Conservation Area and must not involve the loss of any buildings or features that contribute to that special interest, including gaps between buildings, trees, hedges and well-vegetated front and rear gardens.

- i. In the event of the proposed demolition of any of the elements listed in the bullet points below, in relation to buildings:
 - identified in the Redington Frognal Conservation Area Statement as positive or neutral contributors, either on their own, or as a group of buildings; or
 - included in the list of listed buildings and non-designated heritage assets, for which the Forum requests local listing, as shown as shown in 9.1 Appendix Non-Designated Heritage Assets for Local Listing; or
 - identified as non-designated heritage assets;

the replacement development must seek to seek to preserve or enhance the character and appearance of the Redington Frognal Conservation Area / Neighbourhood Plan Area, including through the retention gaps between it and adjacent buildings and through the retention of existing trees, hedges and well-vegetated front and rear gardens.
- ii. Where a case is made for demolition of a building, considered to make a positive contribution to local character and appearance, on the grounds of viability, the applicant must provide details of a meaningful marketing exercise, or offer the property on the open market at a reasonable price for a period to be agreed with the local planning authority, subject to market conditions.
- iii. Extensions must demonstrate how they conserve or enhance the setting of the non-designated heritage asset and the Plan area's green space, in accordance with the BGI policies

2.4 APPLICATION

Buildings which contribute to the special interest of the Redington Frognal Conservation Area, including those forming a positive or neutral contribution and those by “not known” architects, may be adapted and extended in accordance with Sustainable Design Policies (SD) and the Biodiversity and Green Infrastructure Policies (BGI). This is to ensure that buildings and their settings are retained and that they remain an integral part of the Area’s streetscape and character.

The list of non-designated heritage assets is provided at Appendix 9.1 Non-Designated Heritage Assets for Local Listing.

Where there is evidence of deliberate neglect of, or damage to, a heritage asset (designated or non-designated), the deteriorated state of the heritage asset should not be taken into account in any decision.

Where a case is made for demolition on grounds of viability, in relation to a building considered to make a positive contribution to local character and appearance, the open market price and marketing period are to be agreed with the local authority, taking account of market conditions.

The policy is to be applied in close consideration with policies SD and BGI.

SD 3 CAR-FREE DEVELOPMENT

2.5 RATIONALE AND EVIDENCE

With the population of Redington Frognal forecast to grow further during the lifetime of the Plan, the challenge is to ensure that growth is supported by healthy and sustainable transport choices, in accordance with chapter 9 of the NPPF, the new London Plan policy T6, the Mayor's Healthy Streets for London approach (to encourage more Londoners to walk, cycle and use public transport) and TfL's aspiration for traffic reduction (chapter 2 and proposal 22 of the Mayor's Transport Strategy, March 2018).

Camden's Local Plan, adopted in July 2017, recognises the benefits of car-free development and the need to create "more welcoming environments that increase the likelihood of people making healthier and more sustainable transport choices".

Evidence base document (14) SD 3 Connectivity and Air Quality, provides details of the area's high and improving public transport accessibility levels (PTAL) and connectivity, its poor air quality and implications for the financial viability of development.

CONSERVATION AREA STATUS

The Plan Area is virtually congruent with the Redington Frognal Conservation Area (except for a handful of properties on Finchley Road). Because of this, the Plan must give special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

Off-street (and basement) car parking is noted as a key source of harm to the Redington Frognal Conservation Area. For example, Camden's Redington Frognal Conservation Area Statement and Guidelines stated, as long ago as January 2003, that,

"Alterations to the front boundaries between the pavement and houses can dramatically affect and harm the character of the Conservation Area." ... "Where there are low walls alongside the road and within properties they add to the attractive appearance of the front gardens and architectural setting of buildings. Proposals should respect the original style of boundary and these should generally be retained and reinstated where they have been lost. Particular care should be taken to preserve the green character of the Conservation Area by keeping hedges. The loss of front boundary walls where it has occurred detracts from the appearance of the front garden by reducing the area for soft landscaping in this urban residential area. Furthermore, the loss of front boundary walls facilitates the parking of vehicles in part of the property, which would adversely affect the setting of the building and the general street scene."

and,

"The Council will resist any further loss of front boundary walls and conversion of front gardens into hardstanding parking area."

Similarly, Local Plan Policy T2 10.21 affirms that,

"Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, particularly in conservation areas, contributing greatly to their character, as recognised in Camden's Conservation Area Appraisals and Management Strategies. This form can be broken if garden features are replaced by areas of paving or hard standing. Development of boundary treatments and gardens to provide on-site private parking often requires the loss of much needed public on-street parking bays to create vehicle crossovers."

Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water".

Support for this policy is available from the following Evidence Base documents:

- 2003 Redington Frognal Conservation Area Statement and Guidelines
- AECOM Redington Frognal Heritage and Character Assessment, dated September 2015
- (12 i) RedFrog Association Article 4 meetings with Camden, 2011, 2013
- (12 ii) Article 4 Direction Presentation
- (13) Camden Planning Committee members' briefing 14.12.17 (paras. 6.37-6.39, page 447)

- (14) SD 3 Car-Free Development - rationale
- (15) APP/X5210/A/14/2213004 3 Fellows Road
- (16) APP/X5210/W/17/3178421 13 Fitzjohn's Avenue

SD 3 CAR-FREE DEVELOPMENT

- i. The Neighbourhood Plan extends Local Plan Policy T2 Parking and Car-Free Development to apply in respect of new all development, i.e. the creation of new units, the amalgamation of units and reconfiguration of developments (including any new development which does not involve a net gain or loss of units) and extensions to existing buildings.
- ii. The interpretation of Local Plan Policy T2 is clarified to explain that car-free development means that no parking spaces are provided within the site, including underground. The only exceptions made are for disabled users or for essential operational or servicing needs.
- iii. Where electric vehicle charging points are introduced, this must not encourage or allow any new additional car parking spaces, whether on-site or on-street.

2.6 APPLICATION

The policy applies to all kinds of development, whether or not involving demolition, but does not require an existing parking space to be relinquished.

The policy will enable the reinstatement of traditional front boundary treatments, including low retaining walls and front and side garden hedges and soft-surfaced front gardens.

Separate provisions apply to parking designated for disabled users or for essential operational or servicing needs (in accordance with Camden policy Parking and Car-Free Development).

Allocated spaces for shared electric vehicles are encouraged, along with on-street electric vehicle charging points.

The policy applies both to developments involving demolition and those without demolition.

This policy will encourage healthier and more sustainable transport choices, reduce private motor vehicle ownership and vehicle movements and congestion, leading to improvements in air quality.

SD 4 SUSTAINABLE DESIGN AND REDINGTON FROGNAL CHARACTER

2.7 RATIONALE AND EVIDENCE

Policy SD 4 places heritage and biodiversity at the centre of the Area's sustainable development. Its aim is to provide clear parameters for sustainable design for the Redington Frognal Neighbourhood Plan Area, which is virtually congruent with the Redington Frognal Conservation Area. It is intended to ensure that future development proposals and change within the Plan Area will preserve or enhance the character and appearance of the Conservation Area, and deliver growth that is sustainable and provides local amenity.

The distinctiveness of the Redington Frognal Neighbourhood Plan Area is recognised by Camden's Redington Frognal Conservation Area appraisals. The bulk of the Redington Frognal Conservation Area was originally designated in June 1985. It was described in the report to the London Borough of Camden, Planning and Communications Committee as "an exceptional example of consistently distinguished Victorian and Edwardian architecture". The report noted that the area had "already begun to lose some of its interesting buildings" and was subject to increasing pressure for unsympathetic change.

The policy aims to ensure that development does not involve the loss of any buildings or features that contribute to the area's special interest. It builds on Local Plan Policies D1, which require that high quality design "preserves or enhances the historic environment", and the requirements of D2 for conservation areas.

Policy SD 4 encourages a higher standard of design for development, in order to deliver locally distinctive architecture that contributes to, and is in keeping with, the existing character of the Redington Frognal Conservation Area.

It is also intended that the policy will prevent cumulative harm to and reverse the steady erosion of the Conservation Area / Neighbourhood Plan Area and its setting, and that sustainable development will be delivered, in accordance with paragraphs 10 to 12 of the NPPF.

Use of the GLA Urban Greening Factor is encouraged for all development and not just those set out in Policy G5 of the London Plan.

In building on Local Plan policies D1 Design and D2 Heritage, Policy SD 4 provides certainty for developers and supplies specific local detail. This approach is supported by the National Planning Policy Framework, which states that in paragraph 125 that, "Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development".

The following Evidence Base documents are relevant to this policy:

- (1) 2003 Redington Frognal Conservation Area Statement and Guidelines
- (2) AECOM Redington Frognal Heritage and Character Assessment, dated September 2015
- (3) National Planning Policy Framework, February 2019, paragraph 200
- (5) MHCLG National Design Guide
- (18) MHCLG Design Guidance
- (19) Brokenshire orders house builders to protect wildlife
- (20) SD4 Sustainable Design and Redington Frognal Character – recent harm
- (21) Neighbours' costs for 28 Redington Road
- (22) Conservation Studio 28 Redington Road appeal representation – 18 May 2017
- (23) HCAAC objection to 38 Red Rd, 5.3.19
- (24) RedFrog NF objection – 36 Redington Road
- (25) HCAAC objection to 25-26 Redington Gardens
- (26) HHS objection 25 and 26 Redington Gardens
- (27) HHS objection, 24 Redington Gardens
- (28) Other objections to 25-26 Redington Gardens
- (29) Further objections to 25-26 Redington Gardens
- (30) Marketing brochure, 24 and 25-26 Redington Gardens
- (107) Environment Bill, 15.10.19
- (111) Building Better Beautiful Commission - interim report, October 2019
- (125) GRaBS Expert Paper 6 the green space factor and the green points system

SD 4 SUSTAINABLE DESIGN AND REDINGTON FROGNAL CHARACTER

New development, including redevelopment, must complement the distinctive character of the Redington Frognal area and the immediate site context. This includes:

- i. The scale, massing and height of development must reflect the established characteristics of the area, responding to the prevailing 2-4 storey building height.
- ii. Mid-rise development of up to six storeys will be considered for sites fronting Finchley Road, between Frognal and Frognal Lane; up to four to five storeys between Frognal Lane and Platt's Lane and two to four storeys north of Platt's Lane, where the prevailing building heights are much lower. In all cases, the proviso applies that there is no significant detriment through loss of light or increased shading to neighbouring properties and gardens.
- iii. Setback and sense of enclosure of street frontages created by built development must reinforce the established verdant character of streets and spaces, with front and rear gardens.
- iv. The plot coverage ratio of building(s) to open space must respond to the existing character of the area, based on extensive garden areas. Garden space must be provided to reinforce the established pattern of front and back garden spaces around the site.
- v. Redevelopment should maintain or increase, and involve no significant reduction, in the area of soft natural garden space within the site.
- vi. Landscaping must be an integral part of the design and layout of development and should include trees and other planting using native species with a high value to biodiversity, as set out in 9.2 Design and Landscape Guidance.
- vii. The spacing of houses must allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. A minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this will be appropriate in the spacing of new development.
- viii. Where traditional materials are used in new buildings, they must be authentic traditional materials and reflect the palette of materials in the surrounding area and not comprise synthetic materials, such as uPVC or materials with an imprinted or applied surface to imitate traditional materials. Where modern materials are used, they must be durable, with a high standard of finish.
- ix. Development must provide active frontages (with doors and windows) to streets and spaces, including at ground floor level, so as to provide overlooking and surveillance.
- x. 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.
- xi. Creative, bespoke design solutions will be welcomed, especially where they complement the architectural and townscape quality, variety and diversity of the area and incorporate superior environmental performance.

2.8 Application

The Area has many positive aspects that contribute to the rich character of Redington Frognal, which should be sustained, reinforced and enhanced through the application and understanding of the context surrounding each development.

The policy applies across the Conservation Area's eight sub areas and section of Finchley Road on the eastern side which, in October 2019, was not covered by conservation area status. The eight sub areas achieve homogeneity, with differences between them based largely on the density, style and scale of buildings, the period of construction, topography and density of vegetation. Although there is some variation in architectural detailing, the common style and age of buildings generally results in a harmonious and unified structure. The limited palette of materials and the similar age, size and style create a high level of unity and cohesion and a strong local identity across most of the Plan Area.

New development will be expected to preserve or enhance the Plan area and its gardens and provide a generous vegetated front garden, with rear garden space in accordance with BGI Policies. Biodiversity net gains are to be set out and quantified using the GLA Urban Greening Factor for London, an emerging Policy.

To comply with the requirement for biodiversity and landscape design to be an integral part of the design, it would be helpful for design and access statements to include landscaping details for front and back garden space. Examples of planting to benefit biodiversity are provided in 9.2 Design and Landscape Guidance. A very high urban greening score will be appropriate.

To achieve high quality design, development proposals will be expected to demonstrate how they respond to the context and how the Redington Frognal design policy has been applied, including, but not limited to, the contribution made by the following:

- the relationship between the natural environment and built development;
- the typical patterns of built form that contribute positively to local character;
- the street pattern, their proportions and landscape features;
- the proportions of buildings framing spaces and streets;
- the local vernacular, other architecture and architectural features that contribute to local character.

Loss of light or the introduction of shading will be deemed significant if daylight or sunlight are reduced, or shading increased, to habitable rooms or gardens of neighbouring properties.

Pictorial guidance for development that would preserve or enhance the area is provided in the document entitled 9.2 Design and Landscape Guidance.

Developers are encouraged to use Thames Water's free pre-planning service:

<https://www.thameswater.co.uk/preplanning>

This service can tell developers at an early stage if Thames Water will have capacity in its water and / or waste water networks to serve their development, or what Thames Water will do, if it does not. The developer can submit this as evidence to support a planning application and Thames Water can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.

SD 5 DWELLINGS: EXTENSIONS AND GARDEN DEVELOPMENT

2.9 RATIONALE AND EVIDENCE

Policy SD 5 aims to ensure that extension and garden development is subordinate to the use of the host building, that it maximises the preservation of gardens for the health and wellbeing of current and future occupiers and increases the area's resilience, including to provide a natural approach to flood management. Its aims are in line with paragraph 70 of the NPPF, which advises that,

"Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

The Redington Frognal Conservation Area is unique in Camden in benefitting from properties with large gardens, generally increasing in size with proximity to Hampstead Heath.

A substantial cumulative area of natural soft-surfaced garden has been lost since 1948. The Forum made attempts to quantify the loss, but these proved futile, as infra-red technology is unable to detect the surface type where obscured by vegetation, while Ordnance Survey maps exclude extensions and new buildings carried out under permitted development rights (PD) and are unable to distinguish between different surface types within "gardens". Notwithstanding these limitations, Ordnance Survey has been able to demonstrate that:

- the area of the footprint of buildings and extensions (excluding those under PD) has increased from 141,265 sq. metres in 1954-55 to 186,982 sq. metres in 2018 – an increase of 32%;
- the area of "roads, pavements and other" grew at a compound annual rate of 0.2% between 2001 and 2018. Data are not available for 1954-55 but, if the compound average growth rate is applied over the 63-year period, it can be estimated that the area of road, pavements and other has expanded by 13% from 179,371 sq. metres to 203,431 sq. metres;
- the area of "garden" has consequently reduced by from 481,664 sq. metres to 411,886 sq. metres, a decrease of -14% (as set out in Evidence Base document (31) SD 5 Garden Loss). This reduction, however, does not allow for losses due to hard surfaced off-street parking, patios, decking, swimming pools, changing rooms, tennis courts, outdoor kitchens, garden buildings and outbuildings, including those constructed under permitted development rights. This is a serious and unsustainable rate of loss at a time of growing surface water flood risk and climate change.

Changes in Built and Unbuilt Areas in Redington Frognal Neighbourhood Plan Area, 1954-55 Compared with 2018

	Area (square metres)			
	1954-55	2001	2018	% change 2018 ÷ 1954-55
Buildings	141,265	175,729	186,982	32%
Gardens	481,664	429,960	411,886	-14%
Roads, pavements and other 1)	179,371	196,611	203,432	13%
Total Plan Area	802,300	802,300	802,300	0%

Note: 1) 1954-55 estimated from 2001 to 2018 annual growth rate

Source: RedFrog based on Ordnance Survey

A number of planning permissions have been granted for development of separate structures (beneath tree corridors) whose function is unlikely to be secondary to the use of the existing residence, notably:

- 2011/5264/P: Erection of brick outbuilding in rear garden for use as yoga studio (granted 19-12-2011)
- 2015/5681/P: Erection of single-storey outbuilding in rear garden for use as a dog grooming salon (granted 23-02-2016)
- 2016/3691/P: Demolition and replacement rear extension and garden studio (granted 08-11-16)
- 2018/4206/P: Erection of an outbuilding spanning across two rear gardens, with washing facilities, toilet, study rooms, sitting area, plumbing, etc., following removal of a tree. A certificate of lawfulness was granted on 4.12.18.

Relevant Evidence Base documents include:

- (31) SD 5 Garden Loss
- (2) AECOM Redington Frognal Heritage and Character Assessment, dated September 2015
- (5) MHCLG National Design Guide, which “applies to proposals of all sizes, including small scale incremental changes”
- (32) `RF Extensions 2010 to 28.10.17.xlsx
- (33) SD 5 Examples of rear garden loss, detailing specific examples
- (34) London Garden City, GiGL
- (35) CPG Altering and extending your home, March 2019
- (36) RF Association response to CPG Alterations and Extensions
- (107) Environment Bill, 15.10.19.

SD 5 DWELLINGS: EXTENSIONS AND GARDEN DEVELOPMENT

Extensions to existing buildings, including outbuildings and swimming pools, must be designed to complement the character of the original building and context. This includes the following requirements:

- i. Either matching the materials and roof-form of the existing building, including use of authentic traditional materials, or using contrasting materials, forms and construction, where this would help to maintain the original composition of the building.**
- ii. The massing, scale and set-back of the extension must ensure that it is subordinate to the main building.**
- 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 and biodiversity and ecological value within the site.**
- iv. The spacing of houses including the extension must allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. A minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this will be appropriate in the spacing of new development.**
- v. Recessed porches must not be enclosed, including by glass, where the established character is based on open porches**
- vi. Balconies must not be added to existing frontages where it would harm the amenity of neighbouring properties or where it would be out of character with the established character of the property and surrounding area.**
- vii. Hedges and front boundary walls, which contribute to the character and appearance of the Conservation Area, should be retained.**

The problem of “low quality additions which lack detail” is cited under “Issues to be addressed” in the AECOM Heritage and Character Assessment.

This policy, therefore, aims to guard against further erosion of the Area’s total garden space and, in accordance with paragraph 175 of the NPPF, it seeks to encourage “opportunities to incorporate biodiversity improvements in and around developments ... especially where this can secure measurable net gains for biodiversity.”

Other harm caused by over-large extensions includes loss of visual privacy, outlook, sunlight, daylight and overshadowing. Examples of these impacts are provided in Redington Frognal Association's response to Camden's draft Planning Guidance on "Altering and Extending your home"⁹

The policy establishes standards for the size and impact of extensions and garden development.

2.10 APPLICATION

Rear extensions are to avoid overlooking and harm to the amenity of neighbours, including light pollution.

Matching the style of the existing building is often a good approach. However, there are circumstances where using contrasting materials and styles can be a more sensitive approach. For example, using a matching pitched roof for a rear extension may involve obliteration of more of the original elevation than if a flat or mono-pitched roof is used. The quality of design and authenticity and quality of materials are key factors.

Extensions making extensive use of glass will not be acceptable, due to their propensity to cause light pollution and harm to the amenity of neighbours and to wildlife.

The removal of streetscape features, such as front boundary walls, which make a positive contribution to the character and appearance of the Conservation Area, will not be acceptable. The retention of front and side hedges is strongly encouraged.

⁹ Evidence base document (36) RF Association response to CPG Alterations and Extensions, 11.1.19

SD 6 RETENTION OF ARCHITECTURAL DETAILS IN EXISTING BUILDINGS

2.11 RATIONALE AND EVIDENCE

The buildings within Redington Frognal comprise a range of high quality architecture, mostly from the late Victorian and Edwardian periods. Many of the buildings were designed and constructed by the same architects and builders working together. As a result, there is a high degree of unity within the area. It is therefore important that original buildings and their existing architectural features are retained to preserve the original design intention and style.

The Redington Frognal Area exhibits a wide variety of period architectural detailing, such as intricate brick bonds, friezes, gothic detailing, hung tiles and pargeting.

The AECOM Heritage and Character Assessment (Evidence Base document (2)), however, notes that “modernisation of some buildings has resulted in the loss or simplification of important architectural details, such as the smoothing over of rough render, replacement of traditional doors and windows with modern alternatives and the removal of friezes and other ornamentation.”

This policy therefore aims to preserve architectural detailing and the character appearance of the Area. It applies to all development which falls outside of the scope of the General Permitted Development Order.

Evidence Base document (37) SD 6 Modern Suburban Houses by CHB Quennell provides photographs and descriptions of architectural details for the many houses in sub areas 1 and 2 of the Redington Frognal Conservation Area designed by Charles Henry Bourne Quennell.

Relevant supporting evidence documents are:

- (38) Historic England Making Changes for Heritage Assets
- (37) SD 6 Modern Suburban Houses by CHB Quennell
- (58), (59) and (60) original streetscapes and boundaries.

SD 6 Retention of Architectural Details in Existing Buildings

- i. **Front boundary walls, hedges and original architectural details, such as chimneys and porches etc., are to be retained – notably for non-designated heritage assets. Where these have been removed, their reinstatement is encouraged.**
- ii. **Developers are strongly encouraged to retain hedges or, where none exists, to plant new native hedgerow species, as in 9.2 Design and Landscape Guidance.**

2.12 APPLICATION

This policy is to be applied throughout the Conservation Area. Removal of the following Redington Frognal character features is likely to cause harm to the Conservation Area:

- arches over front doors
- intricate porches
- decorative brickwork
- door surrounds,
- windows and roof lights
- timber-framed sash windows and casement windows
- arches over windows
- tiled footpaths
- carved stone on building exteriors
- arches / green arches into gardens
- front and side boundary hedges
- low retaining front boundary walls.

In cases where planning consent is required, repair of original architectural details is to be prioritised over replacement, including of windows and doors. Where appropriate, original, traditional materials are to be retained and repaired, if necessary, and re-roofing is to be carried out in tiles matching the original.

Front boundary treatments, comprising brick walls and / or hedges, are to be retained. Where architectural details have been removed in the past, replacement with suitable copies will be sought. Photographs of some original front boundary treatments and architectural features are shown in Evidence Base documents (37), (58), (59), (60).

Materials used for the repair or alteration of buildings, and for surfacing and boundaries, shall match the existing high-quality palette of materials that typifies the character of each street. Applicants are encouraged to select materials to be used by recourse to pre-application advice and by engaging with the local community.

A variety of residential door types exist across the Conservation Area, but with a consistent style within groups of houses. Where a consistent style exists, and a replacement door is necessary, exact copies of the original doors are preferable.

Original photographs of some front boundary treatments are available.

BGI BGI BIODIVERSITY AND GREEN INFRASTRUCTURE

3.1 WHY DO WE NEED A BIODIVERSITY POLICY?

3.1.1 RATIONALE AND EVIDENCE

Well vegetated gardens with mature (and veteran) trees and shrubs are the setting for the Conservation Area (and Neighbourhood Plan Area) and its non-designated heritage assets. Their importance to the area's character is noted in Guidelines RF 1 and RF 8 of the 2003 Redington Frogmal Conservation Area Statement and Guidelines and in the Green infrastructure and public realm section of AECOM's Heritage and Character Assessment, which emphasises the contribution of "mature established gardens."

Private gardens made up 50% of the land area of the Frogmal and Fitzjohn's ward (in which Redington Frogmal is situated) in 2011, with just 8% of the land used as public green space and open water (compared with 42% for London as a whole).

Para 170 of the NPPF states that "Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."

Para 174 states that "To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Evidence outlining the importance of the Area's private gardens is set out in Evidence Base document (39) BGI The Need for a Biodiversity Policy.

Experience suggests that lack of clarity provides planners and developers with the opportunity to degrade the environment and dilute the aspirations of the Redington Frogmal Conservation Area Statement and Guidelines.

This Policy aims to deliver enhancements to green infrastructure, in order to improve connectivity and secure improvements to local biodiversity, in effect creating a local nature recovery strategy for birds and bats, through application of the following sub policies:

- BG 1 rear gardens and ecology
- BG 2 front and side gardens / front boundary treatments for new developments
- BG 3 tree planting and preservation
- BG 4 lighting
- BG 5 local green spaces.

The following Evidence Base documents provide specific support:

- (39) BGI The need for a biodiversity policy
- (40) Urban domestic gardens (IV): the extent of the resource and its associated features
- (41) Blooming London – Greenspace Information for Greater London
- (42) Scaling up from gardens: biodiversity conservation in urban environments
- (43) Urban domestic gardens (IX): Composition and richness of the vascular plant flora, and implications for native biodiversity
- (44) London Assembly Planning Committee – London Plan response, March 2018 (paras. 9.11, 9.15, 9.18)
- (45) House of Lords Select Committee on NERC 2006 – written and oral evidence (oral evidence provided on 16 January 2018 (QQ 197-208) to the Select Committee on the Natural Environment and Rural Communities Act, by the Rt. Hon. Michael Gove MP.
- (3) National Planning Policy Framework, February 2019 (para.70)
- (46) Benefits of restoring ecosystem services in urban areas

- (47) Spaces Wild, London Wildlife Trust
- (107) Environment Bill, 15.10.19
- (112) MHCLG Natural Environment Guidance, 21.7.19
- (135) Flood and Surface Water management Act, 2010
- (136) DEFRA Surface Water Management An Action Plan, July 2018

BGI 1 REAR GARDENS AND ECOLOGY

3.2 RATIONALE AND EVIDENCE

The London Borough of Camden is designated a “lead local flood authority”. In 2002, Frognal, Finchley Road, Templewood Avenue, Templewood Gardens, Chesterford Gardens, Bracknell Gardens and Platt’s Lane were flooded⁹. The Chief Executive of the Environment Agency describes in his speech of 17 October 2018 how “surface water flooding is a risk which is growing” and “surface water flooding is now included on the national risk register”. In Hampstead in 1975, a surface water flood caused 250 people to be made homeless and the closure of four railway stations.

Moreover, recommendation 9 of the Sir William Pitt review of the 2007 floods states that, “Householders should no longer be able to lay impermeable surfaces as of right on front gardens and the Government should consult on extending this to back gardens and business premises.” Camden’s Local Plan policy CC2 also notes (para 8.36) the role of green spaces / gardens in reducing surface water run-off.

Within London, gardens are vital as a priority habitat for the London Biodiversity Action Plan, and a core habitat focus for London Wildlife Trust’s Living Landscapes vision in the capital .

With virtually no publicly-owned green space, private gardens are critical to biodiversity and infrastructure. They are increasingly essential to wildlife and people, providing shade, absorbing carbon, filtering air particulates soaking up flood water and helping to cool buildings.

Guideline RF 1 of the Redington Frognal Conservation Area Statement and Guidelines notes 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.”

However, the low status of the Conservation Area Statement in the planning hierarchy has meant that Camden has been powerless to enforce its Guidelines, with the result that gardens, and particularly larger gardens, have been dramatically eroded by building extensions, outbuildings and basements.

AECOM’s March 2016 study, The Contribution of Trees to the Townscape Character of the Redington Frognal Area (Evidence Base document (53)) notes the

“opportunity to define policy that enforce or encourage homeowners and developers to retain existing trees within front and rear gardens to protect the garden setting of buildings, and the contribution that trees in these locations make to the verdant character of streets. This could be through specific policy that restricts tree removal, or by using policy to incorporate trees into development.”

The benefits of restoring ecosystem services in urban areas are recognised in scientific research³⁷ and the London Environment Strategy (May 2018) acknowledges that “living in greener neighbourhoods can have a big impact on people’s health and quality of life, and on how attractive a place London is in which to live, visit and do business.”

Adjoining rear gardens with trees and hedges form particularly diverse and important habitat network, both at ground level and above, enabling wildlife in the in the Redington Frognal Area to circulate, and providing a refuge. Together, they form Core Sustenance Zones¹⁰ for bats, birds and other wildlife species. The presence of bats throughout the area is confirmed by a number of bat surveys conducted by The Ecology Network¹¹, The Ecology Consultancy^{12,13}, Furesfen¹⁴ and John Cromar’s arboricultural report¹⁵.

10 Spaces Wild, London Wildlife Trust, October 2015 - Evidence Base document (47)

11 Evidence Base (52 i), (52 ii) and (52 iv)

12 Evidence Base (52 iii), (52 iv) and (52 v)

13 Evidence Base (52 xi), (52 vii) and (52 xix)

14 Evidence Base (52 xx)

15 Evidence Base (52 viii)

Three planning consents at Sarum Chase, 23 West Heath Road (2005/3118/T, 2006/0371/T and 2006/2143/T) saw the felling of some 41 trees, including 7 Lombardy Poplars, 3 Scots Pines, an Oak and numerous other native species, for the purpose of various building extensions. Although Camden had imposed a requirement for some replanting, this was never enforced and was unenforceable¹⁶. As a result, another formerly wooded site has been lost and construction of one dwelling at the copse behind 17 Frognal has been recommended for approval (October 2019).

The benefits of restoring ecosystem services in urban areas are recognised in scientific research³⁷, and the London Environment Strategy (May 2018) acknowledges that “living in greener neighbourhoods can have a big impact on people’s health and quality of life, and on how attractive a place London is in which to live, visit and do business.”

Policy BGI 1 therefore addresses the need to restore ecological networks and to provide potential foraging, roosting and nesting sites. New development in gardens must 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.

Supporting Evidence Base documents are:

- (1) 2003 Redington Frognal Conservation Area Statement and Guidelines
- (5) MHCLG National Design Guide
- (42) Scaling up from gardens: biodiversity conservation in urban environments
- (46) Benefits of restoring ecosystem services in urban areas
- (47) Spaces Wild, London Wildlife Trust
- (48) Camden Local Plan, 2017 (map 6, page 266)
- (49) Managing flood risk in Camden (figure 5.1, page 11; page 24 case study; and page 25 (paving of front gardens and basements)
- (50) Sir William Pitt - 2007 Floods Review (recommendation 9)
- (51) Surface water – the biggest flood risk of all
- (52) BGI 1 Rear Gardens and Ecology – bat reports and other sightings
- (52 i) to (52 xxxii) Ecology Network and various other biodiversity records
- (53) AECOM - Contribution of Trees to the Townscape
- (54) Nature Recovery Network report for DEFRA
- (55) Doses of Neighbourhood Nature – The benefits for mental health of living with nature (BioScience, Volume 67, Issue 2, 1 February 2017, Pages 147–155),
- (56) DEFRA house sparrow losses
- (57) WLGF policy support
- (61 i) to (61 vi) Examples of tree felling
- (107) Environment Bill, 15.10.19.
- (134) Camden Planning Evidence – Biodiversity

BGI 1 REAR GARDENS AND ECOLOGY

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 9.2 Design and Landscape Guidance;
- ii. maximising the area of soft landscaping and using planting with high value to pollinators and insects, as set out in 9.2 Design and Landscape Guidance;
- iii. 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;
- iv. taking opportunities to use hedges as boundary treatments, instead of or in addition to walls and fences.
- v. where tree removal is unavoidable, such as removal of dead, dying, unsafe trees or invasive species, they must be replaced within the site by a similar or other native species, unless it can be demonstrated to the Council's satisfaction that this is not possible
- vi. the inclusion of new water features, such as natural wildlife ponds, is encouraged.

3.3 APPLICATION

The design process should consider the quantum of the existing and proposed areas of soft natural surface. Decking, patios, lightwells and artificial grass are deemed to be hard surface. Wherever possible, additional areas of soft surface and greening measures are encouraged to offset the loss of soft garden space.

The location of all extensions or new development should be carefully situated to sustain and enhance existing connectivity for wildlife. Opportunities should be taken to restore and intensify any areas of the ecological network that have become degraded or where connectivity has been compromised.

Hedgerow species should include native evergreen and thorny plants for winter shelter and protection from predators.

It is also recommended that fences and garden walls should incorporate small gaps to ensure connectivity between gardens for small mammals such as hedgehogs.

Recommendations to create areas with high biodiversity value are:

- I. structure planting with high biodiversity value to provide nest sites, winter shelter and food for birds
- II. wild flower or ornamental meadows with an abundance of flowers to encourage pollinators
- III. natural ponds
- IV. undisturbed wild patches.

Where practicable, ponds should be re-instated and underground rivers "daylighted" (i.e. uncovered and exposed). Reference may be made to the Arup Red Frog Sub Surface Water Features Mapping Report (latest edition) (Evidence Base document (94) and hosted on the Neighbourhood Forum website at:

<http://www.redfrogforum.org/evidence-base/>

Guidance for the planting of native hedges, trees and plants with a high biodiversity value is set out in 9.2 Design Landscape Guidance, which covers:

- I. How to Plant a Mixed Hedgerow
- II. Relative Importance of Trees Found in the London Survey for Supporting Insects
- III. The Ecology Consultancy: Recommended Planting List
- IV. Living Roof Design Guidance
- V. Living Walls Design Guidance

From the numerous bat surveys commissioned, it can be concluded that all gardens within the Plan Area lie on bat foraging and commuting routes, and many hedges and trees support nesting birds. A bat and bird survey screening assessment should therefore be undertaken in line with Camden Planning Guidance – Biodiversity¹⁷. This is to be conducted by a company which is a member of the Chartered Institute of Ecology and Environmental Management for all planning applications involving the loss of gardens, which provide wildlife foraging and / or commuting habitat.

¹⁷ Evidence base document (133) Camden Planning Guidance - Biodiversity

BGI 2 FRONT AND SIDE GARDENS; FRONT BOUNDARY TREATMENTS FOR NEW DEVELOPMENTS

3.4 RATIONALE AND EVIDENCE

Where formal hedges are used for boundaries in gardens, they create a physical and visual barrier between the buildings and the street. This is recognised in Camden's 2003 Redington Frognal Conservation Area Statement and Guidance (Evidence Base document (1)), AECOM's Redington Frognal Heritage and Character Assessment (Evidence Base document (2)) and in the Redington Frognal Neighbourhood Plan SD policies.

The traditional front boundary treatment in the Forum area typically comprises retaining walls in combination with hedges (Camden Local Plan policy T2 para. 10.21 and Redington Frognal Conservation Area Statement and Guidelines, 2003 Guideline RF 8)). In many streets, gardens have been converted to hard-surfaced car parks and boundary treatments removed, causing the street scenes to become degraded. Evidence has been prepared to support the introduction of an Article 4 direction (Evidence Base document (12 ii)), although this is not currently in place. It is recognised, that, due to Permitted Development rights, it will not be possible to implement this policy for all applications, in the absence of an Article 4 direction.

Soil types are predominantly clay, and the removal of front gardens exacerbates water run-off and flood risk. Camden's Local Plan Policy T2 10.20 notes that,

"Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water. Developments seeking to replace garden areas and/or boundary treatments for the purposes of providing on-site parking will therefore be resisted."

Front gardens additionally provide important public amenity value, their trees and hedges contributing positively to the streetscape and to biodiversity.

Side gardens

The Area is characterised by significant and well-preserved gaps between buildings, providing views through to rear gardens. These gaps contribute greatly to the verdant streetscapes (as noted in Camden's Local Plan Policy A2 6.38). Sometimes, these views are the only views onto green space that are available. However, despite the apparent support for maintaining such gaps, gaps have continued to be closed, and it is therefore the intention of this policy to strengthen the protection afforded to their preservation.

BGI 2 seeks to re-green streets, to preserve traditional front boundary treatments and to enhance the street scenes, subject to permitted development rights that may apply to certain proposals.

Photo BGI 2: Front Garden Hedge and Retaining Wall, Bracknell Gardens, Sub Area 6



Photo BGI 3: Front Garden Hedge and Retaining Wall, Platts Lane, Sub Area Two



Evidence Base documents (58) to (60) provide photographic evidence of some original front boundaries.

BGI 2 FRONT AND SIDE GARDENS; FRONT BOUNDARY TREATMENTS FOR NEW DEVELOPMENTS

- i. Existing front boundary treatments, including hedges and walls, should be retained.
- ii. If Camden determines that bats and / or birds could be present, an initial appraisal must be undertaken by a qualified ecologist.
- iii. The Plan encourages front gardens which provide for retention or reinstatement of:
 - a) natural soft surface
 - b) front and side hedges
 - c) original boundary treatments.
- iv. Breaks in the existing front boundary treatment should be reduced, wherever possible
- v. Where front gardens have been lost to car parking, applications involving developments causing any loss of garden (front side and / or rear) space will be strongly encouraged to allocate a minimum of 50% of the plot frontage to soft-surfaced front garden, with a traditional boundary treatment and hedge.
- vi. Where hard surfaces are desired, the materials should be permeable and allow water to percolate into the soil to filter out pollutants and recharge the water table.

3.5 APPLICATION

All hedges and vegetated boundaries are to be mapped as part of planning applications for development affecting front and / or side gardens.

Applications should demonstrate their compliance with this policy through design plans for planting, hedging and soft surfaces for front gardens and materials for boundary treatments.

Where side extensions would not result in the loss of an existing gap between buildings, they should be single storey and set back from the front building line.

Planting and native hedges should be used to screen parking, refuse, recycling bins and other facilities, in order not to negatively affect the streetscape and to provide visual privacy for neighbours.

BGI 3 TREE PLANTING AND PRESERVATION

3.6 RATIONALE AND EVIDENCE

The Redington Frogna! Area was developed as a verdant Victorian and Edwardian suburb, whose character is strongly determined by the presence of many trees lining pavements and adorning the front and back gardens of private properties.

The prominence given to tree planting is apparent from the 1866 Ordnance Survey Map. Forum members, together with Heath and Hampstead Society, have surveyed the remaining veteran trees and trees with developing veteran features and have identified some 55 remaining within the Plan area. The co-ordinates of those identified are provided in Evidence Base document (61) BGI 3 Tree Planting and Preservation, although it is likely that many others exist. Veteran trees provide a unique, high-value contribution to the area's biodiversity, as well as to its character and heritage. It is particularly important to protect these veteran trees and trees with developing veteran features from avoidable felling: it would take many decades before trees planted to replace them could provide a similar contribution.

Data provided by *ProximiTREE* indicate that there were 8,009 trees in the neighbourhood plan area in 2010, with a canopy cover of 30%, considerably higher than elsewhere in London and demonstrating the contribution of trees to the character and sense of place.

As noted in the AECOM report, Contribution of Trees to Townscape Character (Evidence Base document (53)), trees in front gardens contribute greatly to the setting of streets and buildings, while trees in rear gardens are often visible from the street through gaps between buildings.

The aesthetic value of trees substantially enhances the townscape, while shade and shelter provided by their canopies helps to cool urban areas in summer, and prevent heat loss in winter, by buffering the impact of cooling winds. They are important, also, for reducing the risk of flooding by reducing surface water run-off, and improving water quality by filtering out pollutants.

Trees contribute to ecosystems by providing food and habitat for birds, pollinators, and other animals, and improve air quality by absorbing a range of toxic gases and particulates. Larger, native trees, in particular, provide valuable foraging and potential roosting or nesting sites for a range of bird, bat, insect and lichen species. Building on the "right tree in the right place" approach, the right trees within the context of this ecological network are those with a high biodiversity value and a generous leaf canopy. This approach is also adopted in Policy G7 of the emerging London Plan.

With trees making such a large contribution to the Area's character and providing multiple benefits to ecological and human health, it is of great importance that the Area's tree canopy is maintained.

As a result of development, and the conversion of front gardens to car parks, the tree canopy has been considerably eroded to 23% coverage, with widespread loss of trees.

The *ProximiTREE* data below indicate a 40% reduction in the number of Redington Frogna! trees (private and Camden) between 2010 and 2016, demonstrating the clear harm to the appearance of the Conservation Area and its special interest, with implications for air quality.

Number of Trees by Height in the Redington Frogna! Area, 2010 and 2016

Height (metres)	2010	2016	% change
2-5m	2,747	73	-97%
6-10m	2,415	1,155	-52%
11-15m	1,491	1,615	8%
16-20m	1,086	1,237	14%
21-25m	245	703	187%
26-32m	25	279	1016%
total	8,009	5,062	-37%

The felling of trees with a high water consumption, such as poplar and weeping willow, which were historically planted in close proximity to underground rivers, has caused basements to flood and has created many soggy gardens⁴⁷, even requiring the installation of pumps (e.g. University College School and 262 Finchley Road). The location of soggy gardens and underground rivers has been researched and mapped by Arup in association with the Neighbourhood Forum (Arup Red Frog Sub-Surface Water Features Mapping Report, April 2016). (Evidence Base document (77) and hosted on the Neighbourhood Forum website at:

<http://www.redfrogforum.org/evidence-base/>

Evidence Base document (61) BGI 3 Tree Planting and Preservation provides an indication of the high and unsustainable level of tree fellings to facilitate development. A map of some of the area's trees veteran trees (non-designated heritage assets) and trees with developing veteran features is included in the Evidence Base document.

Through careful planting of tree and shrub species, it is envisaged that the Area will regain some of the wildlife species, which have been lost and / or become depleted, and that Redington Frognal gardens will once more become home to sparrows, starlings, thrushes, bats and butterflies.

Policy BGI 3 seeks to close gaps in the tree canopy and to provide a healthy mix of tree species to support health and well-being, to benefit biodiversity and to maintain and improve the Area's heritage character.

Supporting Evidence Base documents are:

- (9) A Policy for Trees in Islington
- (9 i) Islington Tree Policy 2019
- (9 ii) Policy G7 Trees and woodlands | Draft New London Plan
- (9 iii) RBKC Trees and Development
- (61) and (61 i) to (61 iv), providing details of the loss of 40% of the Redington Frognal tree canopy in six years;
- (62) 7111_FC_Urban_Tree_Manual_V15;
- (63) Hackney-Advice-Note-Biodiversity-and-the-Built-Environment: Section 2.2 Biodiversity Enhancing Landscape Design Principles A), B) and C).
- (77) Arup RedFrog Subsurface Water Features Mapping
- (126) Camden Local Area Requirements.

⁴⁷ These are gardens where wet ground conditions are observed, at least on a seasonal basis.

BGI 3 TREE PLANTING AND PRESERVATION

- i. Trees are to be retained and incorporated as part of any development, where possible. Where felling is required, eg on grounds of safety, or because it is an invasive species, one or more trees are to be planted in replacement.
- ii. Tree planting is expected at all developments sites, wherever possible, with species selected on the basis of the trees' high biodiversity value. Where space permits, they should be trees which will ultimately have large canopies.
- iii. Trees selected for planting should have a high value to insects, as in the list provided in 9.2 Design and Landscape Guidance, arranged in order of the number of species supported;
- iv. Development will protect trees that are important to biodiversity, rear garden tree corridors, local character and / or the Conservation Area.
 - a) Development proposals, are to seek opportunities to create, strengthen and restore tree lines and biodiversity corridors, reducing the incidents of breaks and the length of gaps.
 - b) Any development application that proposes tree removal(s) must include justification, by an Arboricultural Association approved consultant, of the proposed tree removal(s) and provide details of replacement tree planting. Any trees removed to facilitate development are to be replaced with one or more trees with a high value to insects, from the list shown in 9.2 Design and Landscape Guidance, arranged in order of the number of species supported. If none of these are judged appropriate by a Camden tree officer, the tree is to be replaced with the species being removed;
- v. Planning proposals are required to ensure that veteran trees are fully and strictly protected, as in Natural England's "Standing Advice for Ancient Woodland and Veteran Trees". The required minimum buffer zone for veteran trees is 15 times larger than the stem diameter of a veteran tree when measured 1.5 metres above ground level, or 5m from the edge of its canopy, if that's greater. Deadwood is to be retained where possible. Canopy reduction to will only be acceptable if the root system of a large maturing tree has substantial decay, making it potentially hazardous, or if it proven to be causing subsidence.
- vi. Tree root protection zone radius required for non-veteran trees is 12 times the stem diameter measured at breast height and capped at a radius of 15 metres.

Note: a tree corridor is a line of trees along or close to the boundary of one or more adjoining gardens.

3.7 APPLICATION

All trees (and any structures) in garden spaces and / or vegetated boundaries proposed to be removed and / or altered are to be mapped as part of planning applications for development, particularly any notable / large / old trees which could contain bat roosts. Their value is to be assessed, using a recognised tree valuation method, such as i-Tree Eco, with substitute planting to replace the losses also set out.

Should the need for a bat and / or bird survey be determined by Camden Council, an initial appraisal of the trees / structures must be undertaken by a qualified ecologist. Any intrusive work (for example use of an endoscope) would require that the surveyor has an appropriate bat license.

A list of trees with high biodiversity value, in terms of the number of insect species supported, is provided in 9.2 Design and Landscape Guidance. A majority of the trees selected should have a long life expectancy, ie. over 100 years, to ensure a diverse tree canopy.

For soggy garden sites within 30 metres of an underground stream, as indicated in the Arup Red Frog Sub-Surface Water Features Mapping Report, April 2016 (Evidence Base document (77) and hosted on the Neighbourhood Forum website at: <http://www.redfrogforum.org/evidence-base/>), it is advisable to plant trees with a high water demand, such as willow, poplar, elm and oak .

To protect their provenance, native trees should be UK sourced and grown, in compliance with the Woodland Trust's UK Sourced and Grown (UKSG) Assurance initiative.

Crown reduction, pollarding and over pruning causes stress to a tree, introducing deep cuts and an increased susceptibility for decay to spread quickly inside cut branches. Crown thinning is the preferred method to minimise storm damage for an otherwise structurally sound tree .

Where trees are scheduled for felling, coronet cutting is recommended, in order that a part of the trunk may be safely retained as dead wood habitat, following the removal of the scaffold branches. It is also recommended following branch reduction – usually of second or third-order limbs.

BGI 4 LIGHTING

3.8 RATIONALE AND EVIDENCE

Insect-eating bats have long been part of the Area's wildlife. Common pipistrelle, soprano pipistrelle and serotine bats commute, forage and roost throughout the Area, wherever there are mature trees and associated shrubbery.

Mature trees and shrubbery provide roosting, shelter and safety and attract a wide variety of insects which bats prey on (such as midges, mosquitoes, moths and gnats).

The presence of bats throughout the Area is confirmed by a number of bat surveys conducted by The Ecology Network⁵⁰, The Ecology Consultancy^{51, 52}, Furesfen⁵³ and John Cromar's arboricultural report⁵⁴. Rear garden tree corridors are vital to their survival.

Artificial night lighting has been shown to have an adverse effect on wildlife, particularly on nocturnal species, such as bats, moths and owls, while the impact on song birds and robins of night-time singing and the continual lack of sleep is likely to be detrimental to the birds' survival⁵⁵.

As well as disrupting the biological rhythms of wildlife, badly-aimed artificial lights are a nuisance to residents in neighbouring properties, by forcing levels of artificial lighting upon the residents that they may not desire and are unable to control.

Policy BGI 4 seeks to limit harm to the environment and nuisance to residents by reducing the level of light pollution, notably in rear gardens.

Relevant Evidence Base documents are:

- (52) BGI 1 Rear gardens and Ecology
- (52 i) to (52 xxxii) various wildlife records
- (64) Pollard A. (2009) Visual constraints on bird behaviour
- (65) Letter from (redacted) of The Ecology Consultancy to (redacted) Principal Planning Officer
- (66) ilp-guidance-note-8-bats-and-artificial-lighting-oct-18
- (137) White LED Blue Light and its effect on Humans and Wildlife Habitat

BGI 4 LIGHTING

External lighting within development sites must have no significant impact on wildlife. This means:

- i. **avoiding short wavelength (cool white / blue spectrum) lighting;**
- ii. **the avoidance of large expanses of glazing at the rear of properties, such as conservatories at first-floor level and above and glazed summerhouses sited in rear garden tree corridors;**
- iii. **providing focused lighting and avoiding wide or dispersed floodlighting;**
- iv. **avoiding lighting of trees, hedges and other areas of high potential for biodiversity;**

3.9 APPLICATION

For security lighting a low-power light emitting 600-900 lumens can offer a suitable solution. Security lights should be adjusted to pick up only movement of people in the area intended, not beyond, and should be fitted with a solar time clock to ensure it is not activated during times of daylight.

Solar-powered lights emit a dim light that is less likely to harm wildlife.

Photo BGI 5: Motion Sensor Lighting, Illuminating Specific Areas Only When Needed



BGI 5 LOCAL GREEN SPACES

3.10 RATIONALE AND EVIDENCE

Research affirms the importance of access to green space and it is one of the indicators used in British Standard ISO 37120 Sustainable Cities. As noted in the September 2014 report by Public Health England and UCL Institute of Health Equity, “Local action on health inequalities: Improving access to green spaces” proximity to plentiful, good quality green space has an important influence on the health of local populations.

Figure 5.4 and 5.5 of the Camden Open Spaces Study, compiled by Atkins, show that most of the Frognal and Fitzjohn’s ward is deficient in access to public parks and other open space, while figures 6.2 and 6.3 reveal a deficiency in access to children’s play provision and figures 7.1 and 7.2 confirm a lack of natural green space provision. The Plan Area also does not meet Natural England Accessible Green Space Standards (ANGSt), which stipulate that:

- no person is to be located more than 300 metres from the nearest natural green space of at least 2 hectares (ha) in size; and
- the provision of at least 1 ha of Local Nature reserve per 1,000 population.

This contrasts with a provision for the Frognal and Fitzjohn’s ward of just 0.0414 ha (about 4450 square ft), for the entire population of 6,838 persons (2011 Census), if a small section of the proposed LGS 7 gains Site of Importance for Nature Conservation (SINC) designation.

A lack of children’s play provision and public parks is also noted on page 159 of Camden’s Open Space, Sport and Recreation Study, 2014.

With no new open space likely to become available, it is essential to protect those that already exist (London Plan Policy G4).

By designating land as a Local Green Space, local communities will be able to protect these spaces from future development, other than in “very special circumstances”.

The following areas have been identified as Local Green Space and fulfil the criteria outlined in NPPF (99) and (100). The table below evaluates the sites to be designated against these criteria.

Support for the designation of Local Green Space in general is provided by the following Evidence Base documents:

- (67) “Nature Nearby’ Accessible Natural Greenspace Guidance Including Maida Vale case study, pages 79-80
- (68) Public Health England- Improving green space access (page 17 onwards)
- (69) BGI 5 Local Green Space Support and (69 to 69 vii), providing further information and support for each of the proposed designations, LGS 1 to LGS 7.
- (127) Camden Open Space Study, 2013 (128) Camden schedule of open spaces, incl WHLTC (site 286).
- (128) Camden Schedule of open spaces, incl WHLTC (site 286)
- (138) Effect of exposure to natural environment on health inequalities
- (139) West Heath Road on Telegraph Hill – painting by RF McIntyre

Compliance with NPPF Paragraph 100 Tests

	a) in reasonably close proximity to the community it serves?	b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife	c) local in character and is not an extensive tract of land.
LGS 1 West Heath Lawn Tennis Club	Yes	Provides the opportunity for outdoors exercise, a social meeting place, with club tournaments, suppers, picnics etc. is used by local residents. It is important also for older residents and children. The site has mature native trees, nettles, native ivy and lies on a bat foraging and commuting corridor. Other wildlife sightings include owls and dragonflies.	It is a compact urban green space, which has been in use since 1912 by residents and schools in the immediate vicinity. It is a green, wooded site.
LGS 2 SINC CaL07 Frognal Lane Gardens, bounded by Langland Gardens, Finchley Road and Frognal Lane	Yes	The garden is a valuable amenity for residents in a green space deprived area. It contains a frog pond and has many mature native trees and ground cover. It is also used by birds, bats and invertebrates.	First notified as a SINC in 1993. Contains a pond and many mature trees, beneath which grow a good selection of wild flowers. The gardeners are well used by local residents for socialising and relaxing.
LGS 3 Embankment between Platt's Lane and Telegraph Hill	Yes	Visual amenity for residents and passers by. The site acts as an important green corridor linking to Hampstead Heath (West Heath). It provides a screen from traffic and its trees filter particulates.	Originally part of West Heath, with several veteran oaks and oaks with developing veteran features, it is a locally distinctive small space.
LGS 4 Studholme Court - the area shaded mauve	Yes	The garden was established by Marie Studholme for the function of providing residents with a natural green space. It is a valuable amenity for residents in a green space deprived area. It contains many fruit trees and is also used by many birds and invertebrates. The garden is valued by residents for relaxation, socialising, exercising, picnics, children's birthday parties, nature and biodiversity.	The garden surrounds the blocks of flats and community which it serves.
LGS 5 Rear Garden at Camden Arts Centre, Arkwright Road, NW3 6DG	Yes	Used by visitors as a quiet retreat and a lush green space in which to picnic, read and observe the wildlife. It is additionally used by CAC for events, artists' residencies, performances, art exhibitions and for education, including courses, schools projects (eg for local disadvantaged and disabled young people), families and youth programmes. It is maintained to incorporate a wild area, and has been used for projects that have engaged with this habitat. The entire site is designated an Asset of Community Value (ref. CAMACV41)	This has been a public space since 1897, when the premises opened as the Central Public Library.
LGS 6 Copse to the rear of 17 Frognal, NW3 6AR	Yes	Attractive visual amenity, preserved trees and biodiverse commuting, foraging and nesting habitat.	The last remaining woodland behind Finchley Road and critical to the Area's verdant townscape and character.
LGS 7 Hampstead Manor Gardens, Kidderpore Avenue	Yes	Female students used the grounds for relaxation and study, away from the public gaze. It was notified as a SINC in 2003. The site is important as a bat-foraging and commuting area and includes a natural pond. The development site was being marketed in 2017 for its biodiversity and contribution to local nature conservation. SINC status is expected for the new wildlife area that has been created.	From 1882, the grounds formed part of Westfield College, dedicated to women's education. The campus became co-educational in 1964. Public access is a condition of the development. The site, with many benches, is used both by residents of the development and residents of the surrounding area.

Public green space within the study area is very limited. The West Heath Lawn Tennis Club (WHLTC) and Frognal Lane Gardens constitute the most substantial areas of open space.

BGI 5 LOCAL GREEN SPACES

Proposed Local Green Spaces, RedFrog area



The following spaces are designated as Local Green Spaces:

LGS 1: West Heath Lawn Tennis Club

LGS 2: SINC caL07 Frognal Lane Gardens

LGS 3: Embankment between Platt's Lane and Telegraph Hill

LGS 4: Open Space at Studholme Court

LGS 5: Rear garden at Camden Arts Centre

LGS 6: Copse to rear of 17 Frognal

LGS 7: Hampstead Manor Gardens

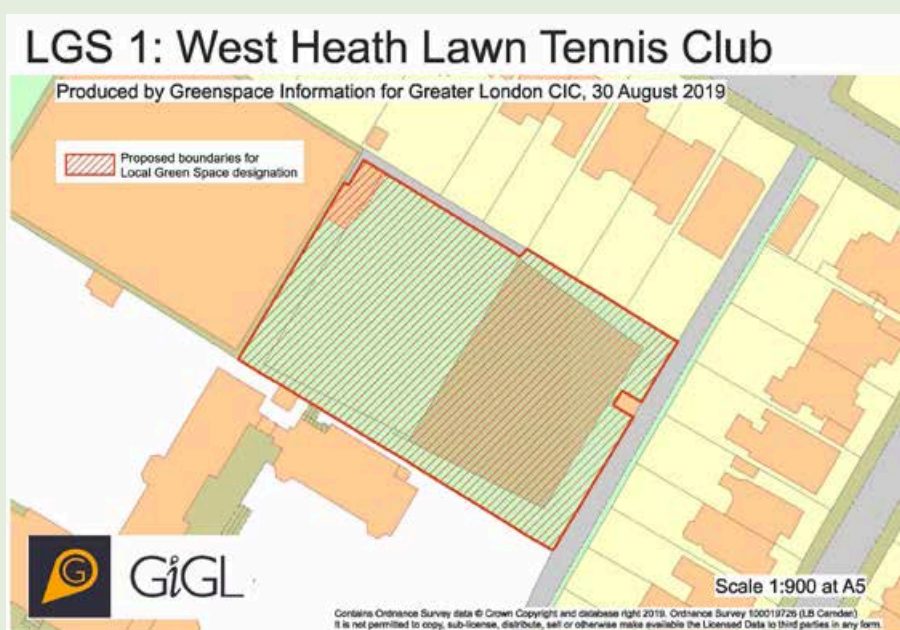
LGS 1: West Heath Lawn Tennis Club (site 286 on Camden's schedule of open spaces)

WHLTC has operated on the Croft Way site since at least 1912. It offers low-cost memberships and provides the opportunity for outdoors exercise for local residents in the area and from elsewhere. WHLTC also provides a social meeting place, with club tournaments, suppers, picnics etc.

It is acknowledged by the freeholder of the site that its use meets the definition of an Asset of Community Value. However, an attempt by the Forum to designate the site as an Asset of Community Value failed because the land is "operational land" as defined in section 263 of the Town and Country Planning Act 1990.

The lease term granted on 1 October 2001 to the West Heath Lawn Tennis Club Ltd by Thames Water Utilities Ltd is due to expire on 30 September 2022. The Plan therefore wishes to designate the site as Local Green Space, notwithstanding its existing designation by Camden as private open space.

West Heath Lawn Tennis Club (Outlined in Red) to be Designated Local Green Space



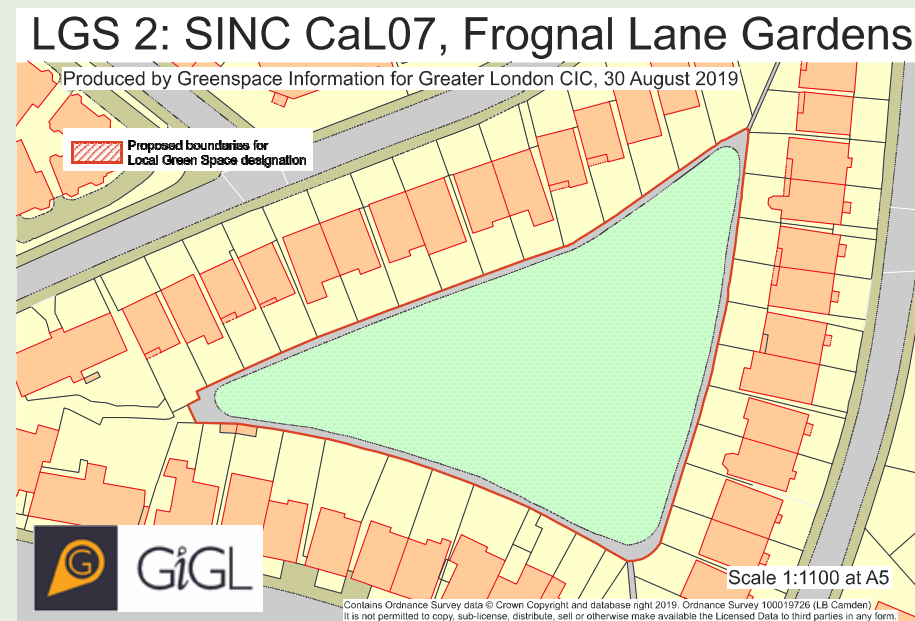
LGS 2: SINC CaL07: Frognal Lane Gardens

This is a small private communal garden bounded by Langland Gardens, Finchley Road and Frognal Lane, owned by Frognal Lane Gardens Ltd. It is estimated that the gardens can be seen from 170 flats/dwellings, while another 25-40 which have view of the trees, but probably not the ground. The garden incorporates an attractive pond (temporarily filled in), and has many mature trees, beneath which grow a good selection of wild flowers. Trees include large London planes ash, oak, Norway maple, holm oak and silver birch. Ornamental shrub beds around the perimeter are planted with both native and exotic species, which include hazel, yew, cherry plum, lilac, spotted laurel and oleaster.

The western end of the site contains numerous trees and shrubs/scrub and is less intensively managed. It, thus, has a wilder appearance with a greater number of tall herb species including meadow buttercup, wood dock, teasel, herb-Robert, red campion, greater periwinkle and enchanter's nightshade.

The site is used by numerous birds including blue tit, jay, blackbird, magpie, robin, thrush, starling and great-spotted woodpecker. Nest boxes have been put up and the site management is focused on creating a more invertebrate-friendly habitat.

CaL07 SINC Comprised of Area of Communal Garden Bounded by Frognal Lane, Langland Gardens and Finchley Road: to be Designated Local Green Space



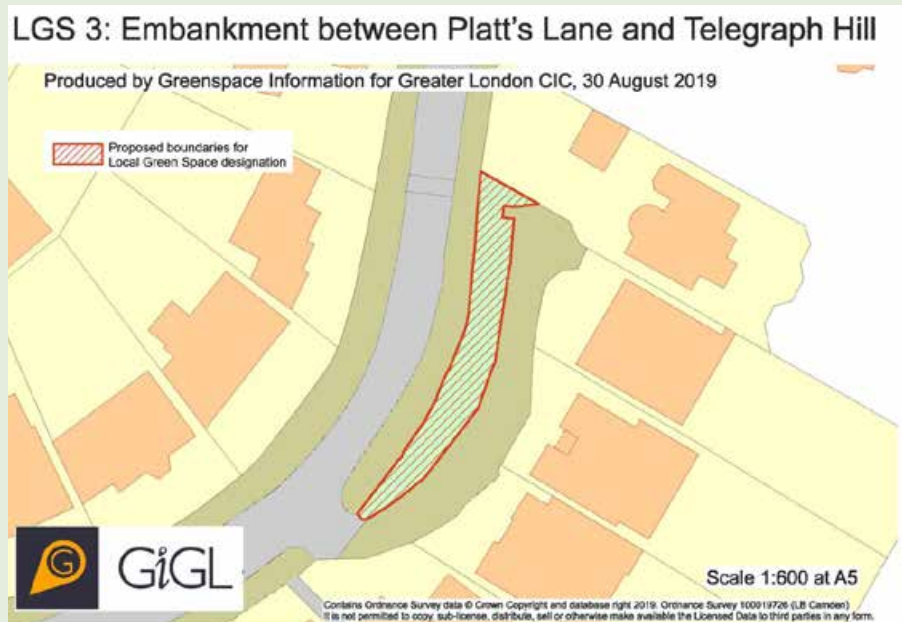
LGS 3: Embankment between Platt's Lane and Telegraph Hill

The embankment between Platt's Lane and Telegraph Hill was originally part of West Heath¹⁸ and is also to be protected.

Here there are several veteran oaks and oaks with developing veteran features, acting as an important green corridor linking to Hampstead Heath (West Heath). It contributes to the biodiversity of the area, fulfils criteria 99 and 100 of the NPPF outlined above and is to be designated as Local Green Space.

Telegraph Hill is additionally of historic importance, having marked the Anglo-Saxon boundary between Hampstead and Hendon. It was also the site of an optical telegraph station constructed by the Admiralty during the Napoleonic wars as a means of communication with the fleet where the beacon was lit to carry the tidings of the Spanish Armada.

Embankment Between Platt's Lane and Telegraph Hill: to be Designated Local Green Space



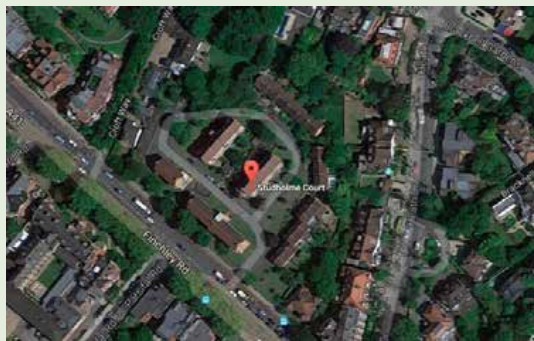
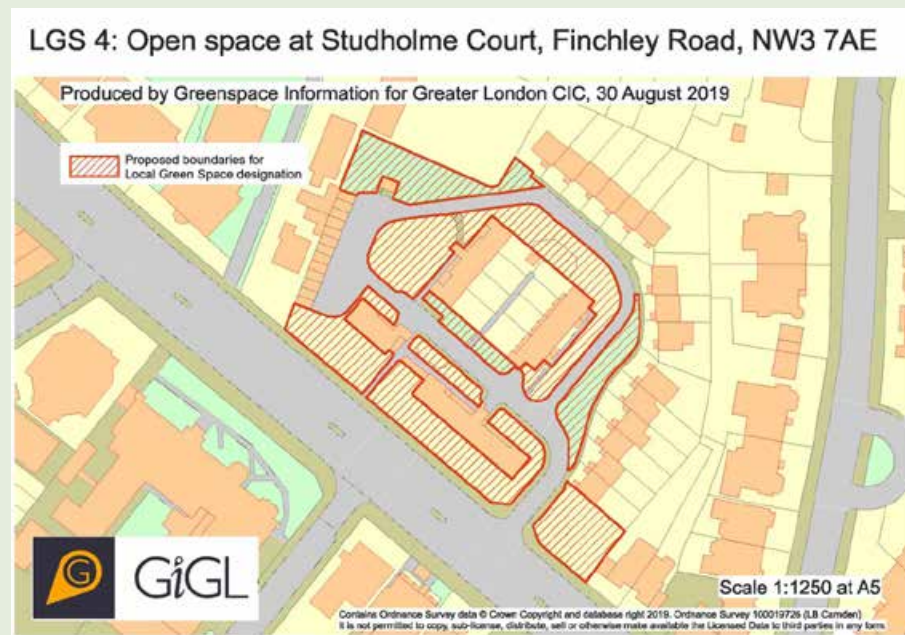
¹⁸ West Heath Road and Telegraph Hill – painting by RF McIntyre
<http://www.hampsteadheath.net/search?q=tele>

LGS 4: Open Space at Studholme Court, Finchley Road, NW3 7AE

Studholme Court was constructed within an orchard on part of the garden of Marie Studholme's former Hampstead home. The site retains many trees, including fruit trees. The verdant setting, its trees and green space are highly valued by residents in the 53 family flats at Studholme Court, for their health and wellbeing and social events take place in summer, notably on the area shaded mauve.

It is noted that Studholme Court is situated within a green space deficient area, yet consideration has already been given to developing the parcel of garden space fronting onto Finchley Road. To ensure the protection of the green space and verdant setting, the Plan seeks to designate the area shaded mauve as Local Green Space.

Open Space at Studholme Court, Finchley Road. NW3 7AE: to be Designated Local Green Space



LGS 5: Rear Garden at Camden Arts Centre, Arkwright Road, NW3 6DG

This much-valued green oasis, with many mature trees and natural landscaping, offers visitors a quiet retreat and a lush green space in which to picnic, read and observe the wildlife. It provides a green backdrop to the Camden Arts Centre café and to adjoining properties in Arkwright Road, Lindfield Gardens, Finchley Road and a green aspect to a small section of the Finchley Road streetscape.

It is to be preserved as unbuilt, natural green space through designation as Local Green Space.

Rear Garden at Camden Arts Centre, Finchley Road. NW3 6DG: to be Designated Local Green Space



LGS 6: Copse to Rear of 17 Frognal NW3 6AR

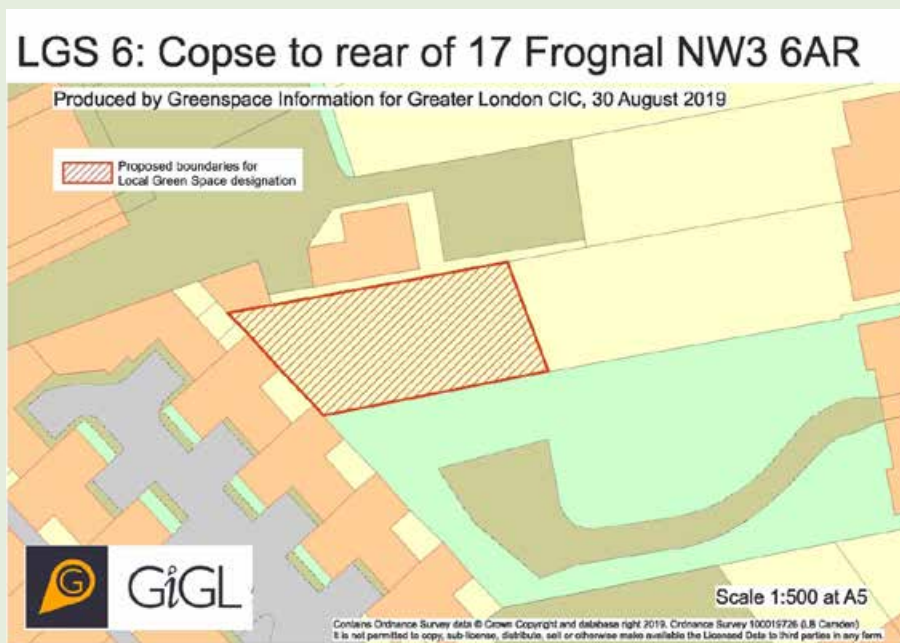
This site is approximately 3,900 sq. ft. and the last remaining area of undeveloped woodland behind Finchley Road within the Plan area. It serves as an important ecological stepping stone between Frognal Lane Gardens (to the north) and Frognal Court Wood (to the south). The site lies in close proximity to the underground river, flowing from Maresfield Gardens to Finchley Road.

The site has no direct access from the street (albeit there is a pedestrian right of way across neighbouring land to Frognal) and seven main trees are subject to Tree Protection Orders.

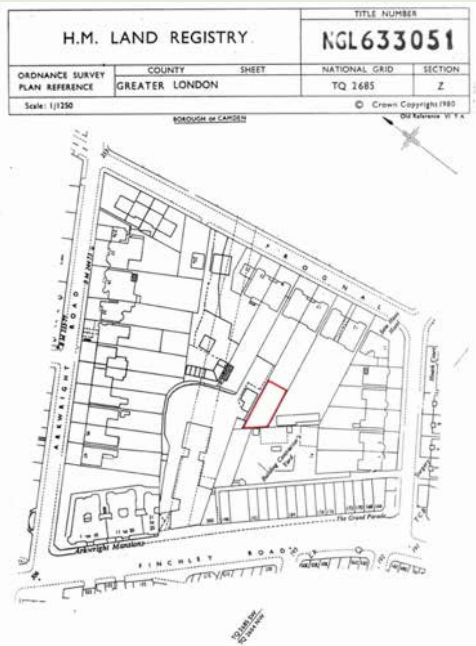
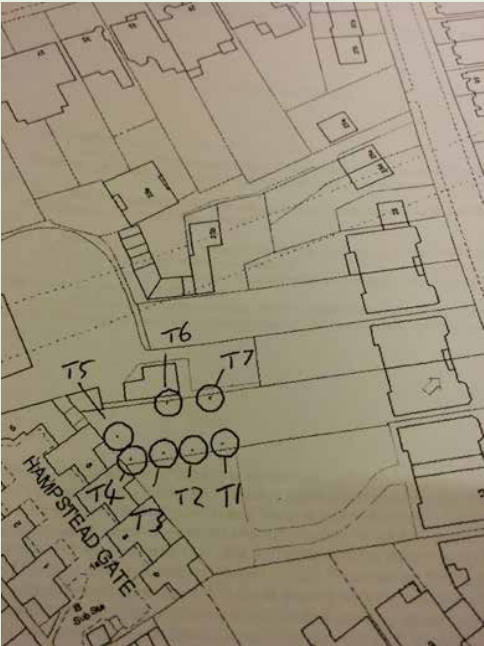
The trees and other growth provide a green outlook to residents in the 55 apartments on Frognal that look out onto the woods, to ten hotel rooms at the Quality Inn and to office users in Hampstead Gate and Meridien House and are visible through gaps between houses in Frognal. The copse is also valued for its peaceful backdrop to nearby gardens and for shielding views of buildings on Finchley Road. The trees additionally help to filter noise and air pollution from Finchley Road, thus increasing the sense of tranquility in Frognal gardens.

The copse is used by bats for foraging and commuting, as documented by Fursefen and is home to nesting birds, black squirrels and other wildlife.

Site Plan of Copse to be Designated Local Green Space



Tree Preservation Orders in Place



View of Copse from Meridien House Car Park



LGS 7: Hampstead Manor Gardens, Kidderpore Avenue

In 2016 the sale of this site was completed, following the grant of planning consent to use the site for housing development. This Borough Grade II Site of Importance for Nature Conservation (SINC) had been highly valued by students at King's College, who enjoyed relaxing there, and for the green natural outlook provided.

In its marketing, the new site owner states that, "we are thrilled to be working in Hampstead, to be conserving the rich heritage of the historical Kidderpore Avenue site and to be overseeing a programme of landscaping and biodiversity across the site that will contribute greatly to local nature conservation". This marketing theme suggests that the developer expects the gardens to be highly valued by residents.

In the s.106 agreement, it is stipulated that the site is to be "properly maintained and opened for controlled public access" (paragraph 24.1 g) and that the Open Space Management Plan will include "measures governing the use of the Open Space by the public and to secure public access to the Open Space from dawn to dusk subject to Clause 21.4.2 or as otherwise agreed by the Council in writing" (paragraph 21.2.1).

The site is valued by residents of the development and also used by non-residents, living in flats without garden access. In July 2019, the Redington Frognal Residents Association organised a wildlife gardening workshop, in conjunction with FrogLife, for local residents. The event was attended by 90 local residents, gaining coverage in the local newspaper.

20

Thursday, July 25, 2019 | **HAM NEWS**

HEATHWATCH



Daily from FrogLife tells visitors at the new Kidderpore Avenue SINC about the area's amphibians.

Picture: REDINGTON FROGNAL NEIGHBOURHOOD FORUM

Contact us

We are calling on Heath lovers to send us your pictures and stories about Hampstead Heath.

Our Heathwatch page is dedicated to the Heath and surrounding green spaces such as Highgate Wood, which have a place in the hearts and minds of people in the Ham & High and Broadway areas.

We are looking for your help in creating a true representation of the unique life on our precious open spaces and beyond.

If you would like to contribute, please contact Sam Volpe at sam.volpe@archant.co.uk or editorial@hamhigh.co.uk.

What's on

Friday: Head to the Parkland Walk for an evening of getting to know the natural world.

From 8, it's time to get to know the creepy crawlies of Haringey, while at 8.30 experts will help visitors learn about the bats which frequent the Walk. (And perhaps you might see one or two!)

Both events are free, meet at the Holmwood Road entrance to Parkland Walk.

Tuesday and Wednesday: In need of a fun family event to distract the kids on a hot summer's day?

You could do worse than head to Rosewood, where 'Summer Quest and Craft' sessions run between 12 and 4 on both Tuesday and Wednesday.

The sessions, which will continue throughout the summer holidays, are £2 each. Turn up during the afternoon to explore the statue's home's art and bring it to life.

Groups across north London celebrate wildlife of local parks

This weekend, on one side of the Heath, the Redington Frognal Neighbourhood Forum was celebrating the reopening of an important nature conservation site, while in Highgate the Friends of the Parkland Walk (FOPW) were getting into the swing of London's National Park City Week.

In NW1 on Sunday afternoon, the community celebrated the end of an arduous planning run - which saw a previously prized Site of Importance for Nature Conservation (SINC) lost - as a replacement was opened in Kidderpore Avenue.

The RFNF's chair, Rupert Terry, told *Heathwatch* it had been a lovely day.

He said: "Sunday's celebration of the reopening of the Kidderpore Avenue SINC was a great success."

"The wildlife gardening workshop, presented by FrogLife, was attended by 60 adults and children, who heard about the importance of creating wildlife ponds and garden areas with native wild flowers."

The afternoon also saw the RFNF's annual meeting. It is consulting on a draft neighbourhood plan, which it said will help protect the area's biodiversity until August 5.

Meanwhile in the Parkland Walk, the Friends group began a bumper set of events planned as

SAM VOLPE
Senior Writer at *Heathwatch*

part of the city-wide London National Park City Festival.

On Sunday experts explained to visitors about the remarkable birds of the longest linear nature reserve in London.

After that former Haringey conservation officer David Devan provided a finger-clip guide to the flora and fauna of the walk.

Sunday saw "forest bathing" - meditation in the woodland and a guided tree walk.

The week continues with events tomorrow (Fri) too, though. Talks about bugs and bats will take place at 6 and 8.30pm respectively. Find them at the Holmwood Road end of the reserve.

Cathy Moss, who chairs the FOPW, told this newspaper: "It's a fantastic opportunity to explore."

"We're one of a kind and a truly wonderful green space and we've got so much planned."

She added it was "well worth" visiting the newly unveiled wildlife trail at the walk too, particularly given the good weather.

To comment on the RFNF draft neighbourhood plan, visit redingtonfrognal.org. For more about National Park City Festival see nationalparkcitylondon.gov.uk



David Devan is a Haringey flower expert.

Picture: SHARON GILLIS



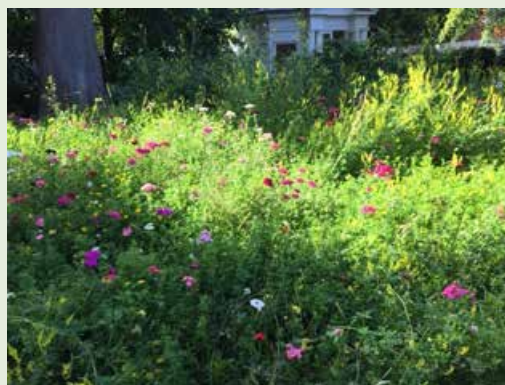
NW1's bugs probably gave Froggnal its name.

Picture: RFNF

Upload your pictures at iwithness24.co.uk and you could see them in the newspaper

iwithness24

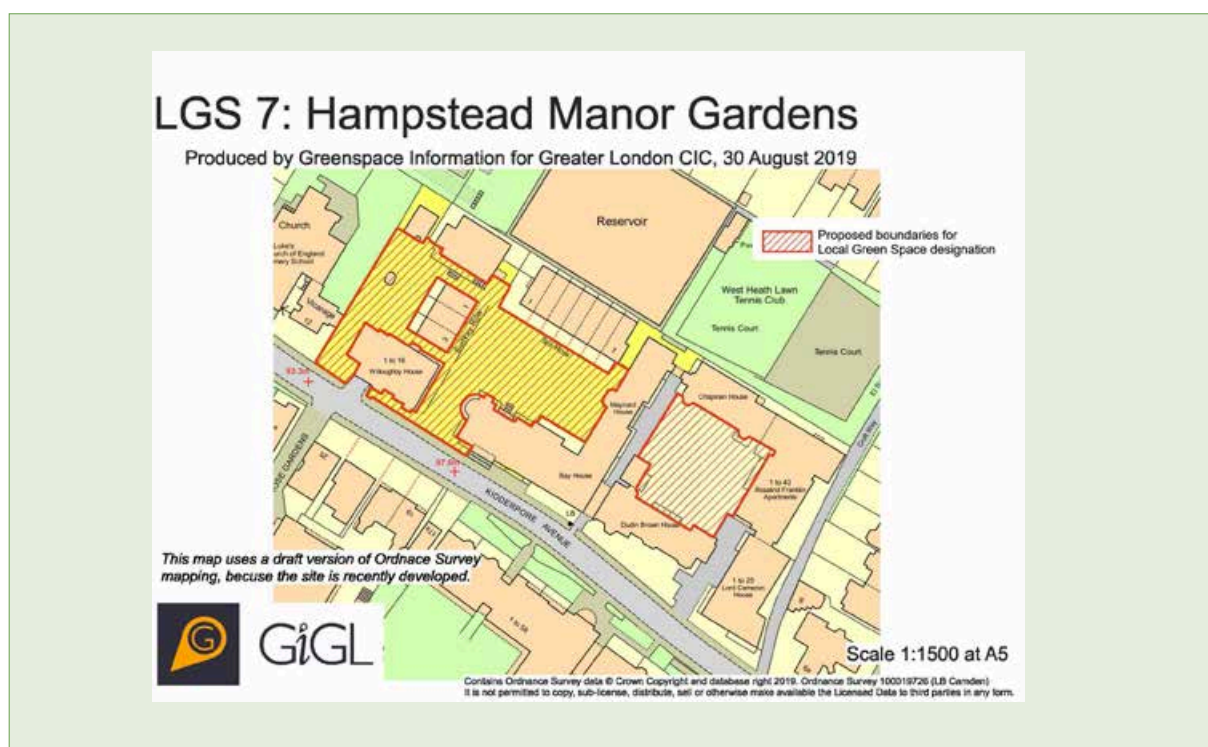
The site is a valuable community asset and the Plan therefore wishes to designate the gardens as Local Green Space. The natural pond, in the north-western corner of the site (adjacent to the Vicarage garden), is expressly included within this designation, on account of its high value to biodiversity.



Former Borough Grade II SINC CaB1109, Kidderpore Avenue (shaded green)



Source: Camden planning consent 2015/3936/P, section 106 agreement
Replacement Open Space, to be Designated Local Green Space



3.11 APPLICATION

The policy designates small green spaces with community value as Local Green Space. This provides a level of protection similar to Green Belt land.

It is recommended, in respect of LGS 6, that the ivy, which was cleared from trees, along with ground cover and other wildlife habitat, during spring 2018, should be replanted, in order to reinstate the site's high biodiversity value.

CF COMMUNITY FACILITIES

CF 1 CULTURAL, LEISURE, TERTIARY EDUCATION AND COMMUNITY FACILITIES

4.1 RATIONALE AND EVIDENCE

The Plan area has a rich history as a cultural and tertiary education hub, as summarised in Evidence Base document (114) CF1 The Role of Tertiary Education and Cultural Facilities in Redington Frognal.

Cultural, leisure and tertiary education facilities are vulnerable to pressure from uses which attract higher land values and, once lost, cannot easily be replaced. The Neighbourhood Plan seeks to help sustain and protect existing cultural, leisure, community and tertiary education facilities, especially those aimed at the elderly and young. Such facilities are essential both to social cohesion and to the health and well being of residents and people working in the area.

The Area lacks many such essential facilities, including a Post Office and a community space. In this context the Plan will seek to assist and promote the establishment of new facilities within the Plan Area. Support for such provision is set out in Evidence Base document (115) Cultural, Leisure, Tertiary Education and Community Facilities Need.

Community facilities are defined as those facilities which help meet the varied needs of the residents of the Plan Area for tertiary education, social, cultural and sporting activities, as well as health and public services.

The Neighbourhood Plan wishes to be able to provide accommodation for The University of the Third Age (U3A) and The Youth Music Centre (YMC), a Saturday morning music school, should suitable premises become available. This would also contribute to the health and well being of residents. This use of a community facility is supported by 79% of those responding to the Vision and Objectives Survey and confirmed in writing by U3A and YMC⁶⁹.

Although recognised that a Post Office does not fall into use class D1, it is nevertheless an important community facility, and the establishment of such a facility is therefore promoted by this policy. Research by Royal Society for the Encouragement of Arts, Manufactures and Commerce (RSA) notes that “the growth of microbusinesses, self-employment and homeworking presents Post Offices with an opportunity to make themselves indispensable hubs for local business communities”⁷⁰. The Post Office similarly acknowledges its role in providing support for community and outreach branches⁷¹, observing that,

“A growing microbusiness community, an ageing population, isolation among older people as well as young people in rural areas, and the development of community-based approaches to public service reform are among the trends creating the need for ‘Community Enterprise Hubs’ across the country.....”

This Policy applies aims to protect community use of the remaining cultural, leisure and tertiary education facilities and will support the development of new facilities.

Supporting Evidence Base documents are:

(70) U3A emails, 13.2.15

(71) Youth Music Centre emails, 20.8.15

(72) RSA-Report_Making-the-Connection_Feb-2014

(73) The Post Office Community Fund

(116) FR Heritage and Character of Finchley Road.

CF 1 CULTURAL, LEISURE, TERTIARY EDUCATION AND COMMUNITY FACILITIES

Applications for change of use, adaptation or extension of community facilities, including facilities to support home working, will be considered for approval, providing:

- i. there is no loss in the community value of the site to the Plan area's population; or
- ii. evidence has been presented to the Council's satisfaction that a community use is no longer viable; or
- iii. an alternative and comparable facility is provided in a suitable, nearby location within the neighbourhood.

Applications for new community facilities will be considered for approval, where they are accessible by public transport.

Community and home worker facilities include uses for: culture, leisure, arts, tertiary education, studios, music, sport, meeting rooms, hot desks and other facilities.

Car parking provision is discouraged but, if any, must cater only for people of limited mobility and essential operational requirements.

4.2 APPLICATION

The policy protects against the loss of existing community facilities and enables new community facilities in sustainable locations.

The Neighbourhood Plan will support development which provides cultural, leisure and tertiary education facilities to cater for the growing population and, particularly, among older age groups.

A nearby location is defined as within maximum walkable distance, from the centre of the Plan Area, of 1.2 kilometres, based on Guidance from the Chartered Institution of Highways and Transportation.

CF 2 COMMUNITY INFRASTRUCTURE PRIORITIES

4.3 RATIONALE AND EVIDENCE

The NPPF (para.175) states that the Community Infrastructure Levy (CIL) should

“Place control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place”.

In areas with approved Neighbourhood Plans, the government has resolved that a minimum of 25% of CIL money is to be spent within the Area. In accordance with this, the Forum strongly encourages Camden Council to use this Plan as the basis for allocating CIL money in this Area.

The availability of CIL revenues presents an opportunity for the Neighbourhood Forum to implement community infrastructure facilities in fulfilment of Redington Frognal's Vision and Objectives. The 2015 Vision and Objectives Survey is included as Evidence Base Document (132).

CF 2 COMMUNITY INFRASTRUCTURE PRIORITIES

A survey of residents found the highest level of support for community infrastructure projects that support:

- i. Greening the area, including tree planting and landscaping;
- ii. Installing high quality street furniture and signage and reduction of street clutter;
- iii. Development of small ‘pocket’ parks;
- iv. Improvement of footpaths;
- v. Upgrading ground surfaces with high quality paving and wide footways.

The chart setting out Forum residents’ priorities for infrastructure spending is set out in Evidence Base document (117) CF 2 Community Infrastructure Priorities.

4.4 APPLICATION

The policy sets out preferences for use of Community Infrastructure Levy money and should be taken into account by the local planning authority in deciding how to allocate such funds.

DS POSSIBLE REDEVELOPMENT OPPORTUNITIES

INTENT

The Plan does not allocate any sites for development and Camden does not have any sites allocated in the Camden Site Allocations Plan.

The primary aim for Redington Frognal possible redevelopment opportunities is for new housing and supporting infrastructure to contribute to the Local Plan aims, and also to preserve local employment. The Plan supports a mixed community, in terms of building use classes and age demographics and socio-economic groups, while retaining the Arcadian and sylvan characteristics, and a variety of open spaces in terms of size and biodiversity. If the sites, described briefly below, were to become available, the following options could be considered.

This Neighbourhood Plan does not make site allocations. However, possible redevelopment opportunities are recognised in the following pages, where the Forum would support development that accords with the Policy SD 4 Sustainable Design and Redington Frognal Character and BGI policies, along with 9.3 Design Guidance for Possible Redevelopment Opportunities.

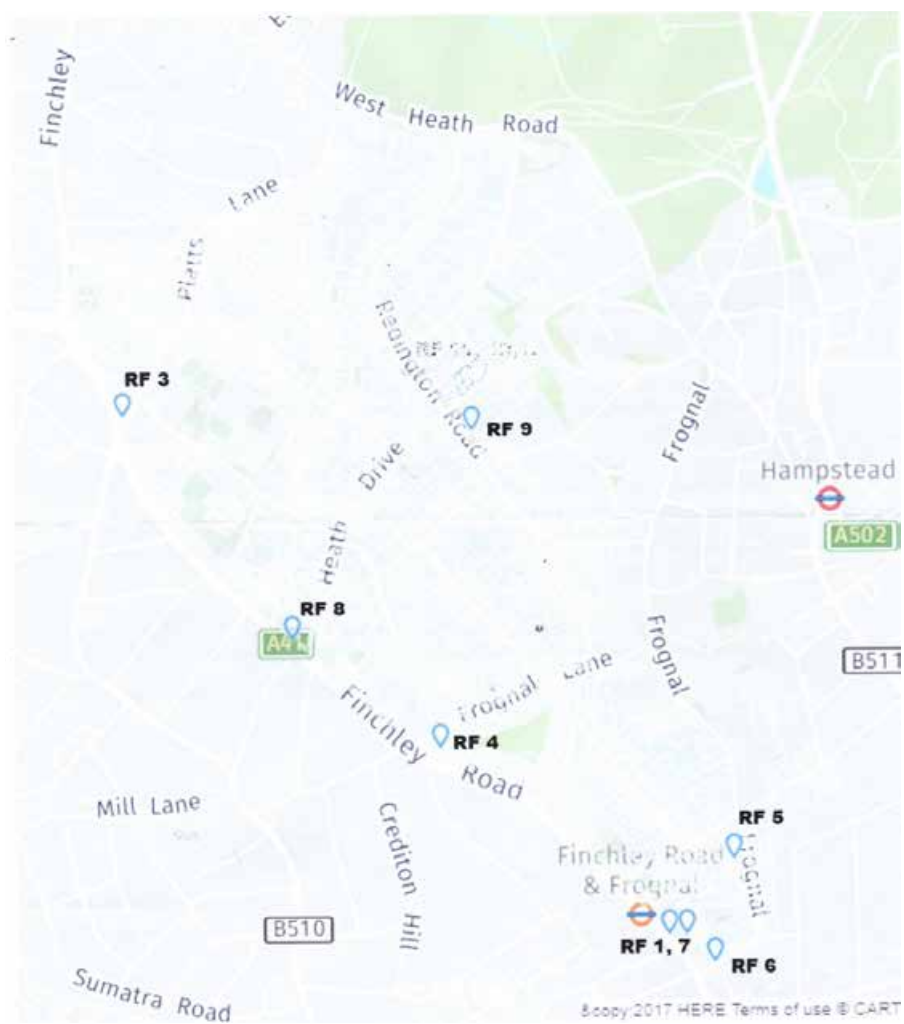
POSSIBLE REDEVELOPMENT OPPORTUNITIES

Development, redevelopment or improvement of the following locations is encouraged. They are not intended as site allocations, but guidance, in the event that any of the sites RF 1 to RF 9 come forward for development. Development should take account of the development principles set out below.

Guidance (not policy) is provided for each of the following potential redevelopment opportunities, with site references:

- RF 1 Meridian House: a new development set back from the building line to enable the creation of a pocket park and contribute greening to the streetscape. This would change the character of the area but could also enhance it by creating an attractive new green space.
- RF 2 Conrad Court: studio flats, including a contribution to daylighting the small section of the underground stream between the entrance to Branch Hill Woods and Templewood Gardens.
- RF 3 1 Platt's Lane: community use and / or upgraded studio flats.
- RF 4 Garages on south side of Frognal Lane: a low-level residential development.
- RF 5 Garages to the rear of 23 to 27A Frognal: a low-level residential development within a biodiverse, green setting.
- RF 6 Hampstead Gate: a car-free development of workshops and co-working facilities, within a setting of, predominantly, natural soft surface and with native trees.
- RF 7 Rear of 166 to 200A Finchley Road: comprehensive rear extensions with active rear frontages, to improve the quality of the environment. An active frontage would include windows, doors and/or balconies.
- RF 8 282-284 Finchley Road: a mid-rise mansion block of up to five storeys, taking account of policies SD and BGI.
- RF 9 Studholme Court Garages: redevelopment as a community facility for use by Studholme Court residents.

The nine potential redevelopment opportunities identified are mapped below.



FR FINCHLEY ROAD

6.1 BACKGROUND

The A41 Finchley Road forms part of the Transport for London Road Network (TLRN) for which Transport for London (TfL) is the highway authority. The carriageway and footway of Finchley Road are both managed by TfL. The road is governed by the Highways Act and planning consent for works to the carriageway and footway are not subject to the Town and Country Planning Act.

Finchley Road forms the western boundary of the Redington Frognal Conservation Area and is lined by Edwardian mansion blocks and other architecture of high merit. It is home to thousands of residents: large stretches are exclusively residential and other parts comprise residential accommodation over shops or offices. Details of the road's heritage and character are provided in Evidence Base document (116) FR Heritage and Character of Finchley Road.

Its footways have high pedestrian counts, generated by residents accessing schools, community facilities, shops, other businesses and public transport.

Supporting Evidence Base documents are:

- (74) TfL Town Centre Study, 2011 – page 5
- (116) FR Heritage and Character of Finchley Road
- (118) Camden Streetscape Design Manual
- (119) TfL Streetscape Guidance
- (120) TfL Healthy Streets for London
- (121) TfL SuDs in London, 2016
- (123) NW Leicestershire Shop Fronts SPD
- (140) TFL Town Centre Study 2011.

FR 6.2 TRADITIONAL SHOPFRONTS RATIONALE AND EVIDENCE

Formerly an elegant tree-lined boulevard, trees, hedges and gardens have been lost due to the road widening programme of the mid 1960s, which necessitated the appropriation of front gardens.

Its appearance has been further degraded by the lack of a succession planting programme to replace felled trees, leaving gaps in the tree canopy.

By working with Historic England to restore the heritage features of traditional shopfronts, the retail section of the Finchley Road streetscape can be revitalised, generating increased pedestrian flows.

Streets with a high footfall are more likely to be commercially viable for traders. Evidence from TfL's London's Town Centre Study 2011 shows that pedestrians spent an average of £373 per month, compared with £226 per month for car users¹⁹. Average spend is also linked to the time a consumer intends to spend in the area.

¹⁹ <http://content.tfl.gov.uk/town-centre-study-2011-report.pdf>

FR FINCHLEY ROAD: TRADITIONAL SHOPFRONTS

Historic shopfronts in Finchley Road must be retained.

- i. New shopfronts must complement the Victorian or Edwardian character of the street and must include a shop window, doorway, stallriser, fascia, corbels and pilasters.
- ii. Shopfronts must use a palette of materials similar to the original Victorian frontages, including:
 - timber frames, glazing bars and fascias;
 - part-glazed timber doors;
 - timber or render stallrisers;
 - timber, stone or render pilasters;
 - paint finishes.
- iv. Where the shopfront incorporates paneling, it must comprise constructional timber panels and not be created through the application of timber beading to a flat timber surface.
- v. Reinstatement of shop fronts, based on evidence of the original design, will be welcomed.
- vi. Shopfronts must be retained, including where shops change to alternatives, such as offices.

6.3 APPLICATION

The policy sets out the essential components of shop fronts to complement the Victorian and Edwardian character of the street, whilst avoiding being prescriptive on stylistic details.

Planning applications relating to retail premises should seize the opportunity to restore and reinstate heritage features that have been lost, such as unpainted surfaces, pilasters, corbels, glazing bars, stall risers, part-glazed doors and fascias.

Active frontages are desirable for premises with non-residential use classes.

Where a Victorian and Edwardian shopfront survives, in whole or in part, it is to be retained, even if the use of the property has changed. Where a new shopfront forms part of a group of Victorian or Edwardian shopfronts, its design should replicate the original. The policy applies to all those traditional shopfronts highlighted in yellow on the two maps below.

Traditional Shopfronts at 166 to 200A Finchley Road and at Palace Court, 250 Finchley Road (both highlighted in yellow)



The Forum encourages Camden to work with TfL, the Mayor of London and Historic England to revitalise the retail section and generate increased pedestrian flows, through the restoration of heritage features to improve the streetscape.

An example of successful regeneration and the dramatic impact on business is provided by the restoration of the Bartletts hifi retail outlet on Holloway Road, where sales grew markedly following restoration of the shopfront.

Restored Shopfront at Bartletts, 175-177 Holloway Rd, London N7 8LX



As recommended in Section 7 of TfL's Streetscape Guidance, Yorkstone slabs should be prioritised as the most appropriate material for footways for a Conservation Area.

Street furniture should be in a single black colour, with surplus furniture removed, in order to reduce street clutter.

Victorian / Edwardian Shopfront at 483-485 Finchley Road



The original fascia at no. 485 has been obscured by the Chessams sign, detracting from overall appearance and the window frames and doors painted in an inappropriate colour.

UD UNDERGROUND DEVELOPMENT

UD 1 UNDERGROUND WATER FEATURES

7.1 RATIONALE AND EVIDENCE

7.1.1 HYDROGEOLOGY

The Plan Area borders a Regionally Important Geological and Geomorphological Site (GLA 42), which the London Plan seeks to protect and promote. It is also situated on unstable soils (London clay, Claygate Member and Bagshot Formation) above a large body of underground water, including the underground River Westbourne (also known as the Cannon) and its tributaries, and the local authority is designated a “Lead Local Flood Authority”.

Arup was engaged to map the lost streams and natural springs of the Redington and Frognal Plan Area. A method was developed for the community to co-create and maintain a live online map, by combining local community-sourced knowledge collected by the Forum with a range of analyses undertaken by Arup. These desk-based analyses included topographic flowpath modelling, review of historical maps and records, and a review of hydrogeology to indicate the location of spring lines. Local knowledge from residents, such as the discovery of culverted watercourses beneath properties, or boggy patches in gardens, was reviewed and mapped, and this often supported other lines of evidence.

The study identified that the neighbourhood was once home to the headwaters of London’s most famous lost rivers: the Westbourne, Tyburn and Fleet. The study also demonstrated how the history of the area is intrinsically linked with the wells and springs that were exploited by Victorians for the perceived health benefits of the groundwater. While there are few visible clues to the public at street-level, the analysis indicates that the water is likely to still be flowing beneath the surface, including in pipes or sewers.

The map is presented in Evidence Base document (77) Arup Red Frog Sub-surface Water Features Mapping and hosted on the Redington Frognal Neighbourhood Forum website. However, it is important to point out, as noted by First Steps chartered engineering geologists, that the map will be liable to misinterpretation

“by those unfamiliar with the subject as indicating that water does not exist other than where shown. Groundwater is everywhere and the Arup map simply records its manifestation at or near ground level.”

The policy seeks to ensure that potential problems arising from basement excavation are addressed at application stage. It also aims to prevent water damage to nearby properties arising from the diversion of underground water features and incorporates guidance from the Supplementary Planning Document adopted by the Royal Borough of Kensington and Chelsea. The policy applies to all applications involving excavation for underground development. Basement development is defined as the construction or extension of one or more storeys of accommodation below the prevailing ground level of a site or property.

Supporting Evidence Base documents include:

- (5) MHCLG National Design Guide
- (49) Managing Flood Risk in Camden
- (75) London’s Foundations – Policy 7.20, page 13
- (76) UD Hydrogeology, Ground and Groundwater Movement
- 77) Arup Red Frog Sub-Surface Water Features Mapping
- (77) Arup Camden geological, hydrogeological and hydrological study Guidance for subterranean development, November 2010
- (78) Can the Laws of Nature and Land Coexist in a Basement
- (79) First Steps tracked changes UWF draft 1, 8.10.17 This is an early version of Policy UD Underground Development, showing comments made by First Steps to Success
<https://firststeps-geo.co.uk/about-us.html>
- (80) RBKC Basements SPD
- (81) Redington Road spring line emails 2011
- (82) UD Soil Depths – Redington Frognal background
- (83) Soil Depth Telephone Conversations, 26.2.18 and 6.3.18
- (84) Seething Lane 2 metres (Section 7 Positive reflections).

- (85) Islington Basement Development SPG – section 7.4 Basements in Proximity to Trees and, particularly, 7.4.11 to 7.4.16\
- (86) Applied Tree Biology – page 155
- (53) AECOM - Contribution of Trees to the Townscape
- (87) UCL - The Hampstead Storm, August 1974
- (88) Surface water- The biggest flood risk of all - GOV.UK
- (89) Environment Agency - RedFrog surface water flood risk
- (90) Recent downstream surface water flooding
- (91) CIRIA report C723 - Water Sensitive Urban Design
- (92) RedFrog-Spring-line-map
- (93) Spring line sinkhole
- (94) Arup Figure 7 - Results Map (Rev F3 21.5.16) – sub-surface water features in the Redington Frognal Neighbourhood Plan area
- (95) Need for cumulative impacts assessment - Email from affected resident to Ward Councillor
- (96) Camden New Journal - residents' basement experience 15.3.18
- (97) Emails re Camden's Basement Policy 23.3.18
- (98) Evidence to DCLG inquiry 6.1.17
- (99) Ham and High - basement assessment problems, 14.1.16
- (100) Mary Poppins house ceiling collapses after neighbour built extension | Daily Mail Online
- (121) TfL SuDs in London, 2016
- (135) Flood and Water management Act, 2010
- (136) DEFRA Surface Water Management An Action Plan, July 2018
- (141) 20171229/P – 5 Templewood Avenue
- (142 i) 3 Greenaway Gardens car lift – HHS objection
- (142 ii) 3 Greenaway Gardens consent – 2017/1499/P.

7.1.2 GARDEN VIABILITY

Paragraph 170 of the NPPF requires that development contributes to and enhances the natural and local environment, including, “d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”

There is an increasing trend for domestic basement extensions in the Plan Area (as noted in Evidence Base document (82) UD Soil Depths. Although basement extensions can provide an opportunity to add habitable space to homes, in the neighbourhood plan Area, they are frequently utilised to provide basement car parking and car lifts²⁰. This is, arguably, at variance with Camden's Local Plan Policy T2 for car-free new development. In a test case of the application of Camden's new car-free development policy. Camden officers successfully argued that the requirement for car-free development applies only to cases involving demolition, paving the way for a development of two flats with eight off-street parking spaces (including four spaces within a new basement) and a car lift²¹.

The use of basement space for car parking and / or car lifts additionally causes harm to the amenity of neighbours. The noise and vibration impacts resulting from such a use is contrary to Local Plan Policies A1 paragraphs 6.19 and 6.20 and A4 paragraphs 6.89 and 6.91.

Generous land plots with well-vegetated gardens are intrinsic to the setting of the Redington Frognal Conservation Area. However, basement development continues to further erode front, side and rear gardens, with attendant losses to the soil, or garden substrate, and the vegetation. Soil and garden substrate play a crucial role in supporting and providing a number of ecosystem functions, including the provision of habitat (shelter and forage) for a range of wildlife. The development of basements often results in tree loss and reduces the scope for future planting of large-canopy native trees, which are so intrinsic to the Redington Frognal Conservation Area.

20 Examples are the Mount Anvil, Barratt and Westfield developments in Kidderpore Avenue, 5 Templewood Avenue (2017/1229/P) and 3 Greenaway Gardens (2017/1499/P)

21 5 Templewood Avenue: 2017/1229/P

The Underground Development policy seeks to ensure that full consideration is given to the potential biodiversity and green infrastructure impacts of basement developments at application stage. This policy applies to all new basement development.

7.1.3 BASEMENT IMPACT ASSESSMENTS

Camden's Local Plan Policy A5 has a clear requirement to demonstrate that basement development "does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment".

Camden currently requires a staged approach to screening and scoping. However, the process assumes that the excavation and construction work will proceed according to plan. But, works have not always proceeded according to plan, and there have been examples of harm caused to properties in Redington Frognal, as a result of nearby basement excavation. The requirements adopted by the Royal Borough of Kensington and Chelsea, as set out in its Basement Supplementary Planning Document, are appropriate, as a minimum, for the substantially more complex hydrogeological structure of the north west slopes of Hampstead. This policy, therefore, requires rigorous site investigations and seeks to ensure that potential problems arising from basement excavation are addressed at or before application stage. It also aims to prevent water damage to nearby properties arising from the diversion of underground water features.

UD 1 UNDERGROUND DEVELOPMENT

Residential basements and other underground development, including car parking and swimming pools, must have no adverse impact on:

- i. the viability of garden spaces. This requires maintaining 3 metres of depth for roots of large trees and 2 metres of depth for roots of medium trees. Large and medium trees are defined as:
 - a. large trees (ultimate height of 15m+): a minimum of 30 m3
 - b. medium trees (ultimate height of 8 -15m): a minimum of 20 m3.;
- ii. the character and verdant amenity of garden spaces, including through the impact of light wells, car lifts and other surface features;
- iii. the viability of trees with ecological or amenity value and potential for future tree planting. This requires maintaining 3-metres of depth for roots of large trees and 2-metres of depth for roots of medium trees;
- iv. underground streams or spring lines, including through cumulative impact. This includes ensuring that an underground stream or spring line is not diverted;
- v. neighbouring properties, though impacts, and cumulative impacts, on ground water and land stability;
- vi. proposals for basement development will be required to demonstrate how they will not cause cumulative erosion of garden space ;
- vii. proposals for basement development will be required to demonstrate that they will not contribute to localised groundwater flooding;
- viii. proposals that include new water features to manage drainage, including the daylighting of underground rivers, will be welcomed.

Where planning applications include insufficient technical information to allow proper assessment of impacts, development proposals will be refused.

7.2 APPLICATION

It will be helpful to demonstrate compliance with policy UD through the steps set out under headings 7.2.1 Screening and Information to Accompany Planning Applications and 7.2.2 Basement Impact Assessment Guidance. However, not all of this guidance will be relevant for every application for underground development.

7.2.1 SCREENING AND INFORMATION TO ACCOMPANY PLANNING APPLICATIONS

Developers are encouraged to also provide detailed calculations of the design, based on site-specific facts, i.e. not merely the preliminary design calculations, to neighbours within 20 metres or four times the basement depth, according to whichever measure is greater. The calculations must include contours of predicted vertical settlement and the predicted impacts on neighbours.

The cumulative effect of several underground developments in proximity can be more significant than the impact of a single basement. Applicants must provide a map showing all existing and proposed basements within a distance which is determined at the scoping stage of the Basement Impact Assessment. The distance to be considered will depend on the site's geology, topography, the basement proposals, the nature and density of surrounding structures and infrastructure etc. including the basement's extent and ground conditions, in order to assess the cumulative basement impact. The map must also show all known sub surface water features, as identified by Arup in the Evidence Base document (94) "Arup Fig 7 – Results Map".

Differing soil types, e.g. Claygate Member beds, Bagshot sands, gravel and band D of the London Clay Formation must also be mapped, indicating the site of the proposed basement and existing and other proposed basements around all surrounding properties, and further afield, if the circumstances warrant this.

Burland Scale tests and a ground movement assessment will be required from the applicant, prior to the determination of the planning application. Applicants must understand that the Burland calculations relate to walls with no windows or doors, and judge accordingly when assessing the relevance of their calculations to nearby structures.

Justification for the Burland Scale damage level assessment is also to be provided, where there are properties within the likely zone of influence.

Applications are to be accompanied by a report prepared by the engineer detailing how the assessments and design will be executed, cross-referenced to established industry practice, to allow planning approval with conditions. The Planning Officer should then review this at the appropriate time after design has been fully completed, to check if the conditions have been met.

Screening measures to be undertaken, at the earliest possible stage in the planning application process, include review of the map developed for Redington Frognal Neighbourhood Forum, Arup Fig 7 – Results Map – (Evidence Base document (94)). The map is also hosted on the Redington Frognal Neighbourhood Forum website at: <http://www.redfrogforum.org/evidence-base/>

A copy of the map is to be marked with all existing and proposed basements and sub surface water features within the zone of influence, as determined by the scoping exercise, to help assess the cumulative impact.

These maps are to form part of a the BIA, alongside the documents cited in the latest Camden Planning Guidance for Basements and are to be submitted in the BIA report.

Contours of predicted vertical settlement and predicted impacts, including cumulative impacts, on neighbours, both upstream and downstream, must accompany all planning applications, at the earliest possible stage. This relates to both ground-water induced and excavation-induced movement.

Evidence must be provided, at the earliest possible stage, that damage to neighbouring properties will be less than or equal to 1 ("very slight") on the Burland Scale.

An assessment of current ground and geology conditions, topography and groundwater levels will be required. Where possible, this should include details of the structure and foundations of the existing building and neighbouring properties

7.2.2 BASEMENT IMPACT ASSESSMENT GUIDANCE

This section provides helpful guidance to avoid potential damage from basement development and demonstrate compliance with policy UD.

It is advisable that all issues related to the BIA, or raised by the Independent Assessor appointed by Camden, are resolved to the fullest extent possible prior to the determination of the planning application, rather than being deferred as a requirement of the Section 106 agreement. The purpose of this policy to promote sustainability in development.

The sequencing of the basement excavation and construction, and how the work affects ground movements, are of utmost importance, and this must be set out in the BIA. Planning consent is to be linked to geotechnical instrumentation, if the results of the screening and analysis show this to be advisable.

For the BIA, it will be necessary to dig holes in the soil, inspect the soil below ground and identify the different soil layers. The soil must be inspected and the sides of the holes checked for signs of caving in during different weather conditions, including how the sides of the holes respond to rain.

The BIA is to include estimations of ground and underground water movements, including cumulative impacts, made by a qualified structural engineer, to be prepared in accordance with Camden's latest Basements Planning Guidance and based on ground characterisation provided by a qualified hydrogeologist. Both the engineer and the geologist should be chartered. Ground movements and ground water flow calculations will be required for different soil types and conditions, taking account of the differing rates at which water travels through differing soil types.

The guidance below is additional to that set out in the latest Camden Planning Guidance for Basements and applies to both excavation and basement construction.

7.2.3 BASEMENT IMPACT ASSESSMENTS

The following information must be provided as a minimum and provide evidence that the ground will withstand underground development without causing any adverse impacts.

- i. All engineering calculations and specifications that can be provided before commissioning a building contractor should be made public at the earliest possible stage.
- ii. Engineering design should be advanced to Detailed Proposals Stage (equivalent to RIBA Stage 3), as set out in the Services of ACE (Association of Consultancy and Engineering) Agreement 1: Design, 2009 Edition).
- iii. As a minimum, BIAs must incorporate the following information and data:
 - a) The sequencing of the basement excavation and construction.
 - b) Soil samples, including those near boundaries with neighbours must be taken to a depth below the footing of the proposed base of the basement. The boreholes measurements may need to be conducted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons. In some cases, when boreholes measurements show a groundwater risk, an automatic log water measurements recorder may need to be left activated in the boreholes over a sustained period of contrasting rain cycles to demonstrate local groundwater and water table levels and the local extent of groundwater surges / flooding during and immediately following storms.
 - c) In some cases, when boreholes measurements show a groundwater risk, an automatic log water measurements recorder may need to be left activated in the boreholes over a sustained period of contrasting rain cycles to demonstrate local groundwater and water table levels and the local extent of groundwater surges during and immediately following storms.
 - d) Boreholes data, ground movement and ground water flow calculations must be included as part of a factual report. An interpretative report alone will generally not be sufficient.
 - e) Hydrological modelling, to show whether it will be possible through the inclusion of drainage systems, to prevent any significant harm from changes to groundwater levels or flow. Hydrological modelling only needs to be done if it cannot be demonstrated through screening and scoping that there is no risk.

- iv. Depending on the outcomes of the screening and scoping stages, the BIA should include appropriate drawings that describe the detail of the engineering designs and illustrate how the construction addresses the following:
 - a) Groundwater
 - b) Drainage
 - c) SuDS
 - d) Flooding
 - e) Vertical loads
 - f) Lateral loads
 - g) Cumulative impacts on ground stability and underground water movements
 - h) Ground conditions
 - i) Trees and planting
 - j) Infrastructure
 - k) Vaults
 - l) Existing structures
 - m) Adjoining buildings and structures
 - n) Overall stability (permanent and temporary works)
 - o) Underpinning (if proposed)
 - p) Piling (if proposed)
 - q) Special considerations e.g. cantilevered stone stairs and landings, balconies or other important functions or features in an existing building which need special consideration.
- v. The BIA must also demonstrate that trees of category A or B, or included in the list of trees with a high value to insects (shown in 9.2 Design and Landscape Guidance) will not be felled or liable to die..
- vi. Where a BCP is requested (as set out in CPG: Basements), the BCP should be written by a structural engineer, and submitted alongside the BIA at the time of applying for planning consent. The BCP should set out ways in which potential problems arising from cumulative impacts on ground stability and underground water movements will be resolved.
- vii. In order to protect against sewer flooding, Thames Water recommends the installation of a positive pumping device. This should be installed in each new basement development, unless a strong case for alternative measures can be made.
- viii. Basement applications should not be determined until all technical outstanding issues are resolved to the largest extent possible, prior to the commissioning of a building contractor.
- ix. Where the independent assessor is to be present at a planning meeting, it should be represented by an engineer of at least Specialist or, preferably, Advisor grade in the UK Register of Ground Engineering Professionals (RoGEP). The register is held by the Institution of Civil Engineers.

UD 2 CONSTRUCTION MANAGEMENT PLANS

7.3 RATIONALE AND EVIDENCE

Construction Management Plans should include limits on hours of construction as set out in the policy text box below.

The Plan recommends that construction work should be limited to 8am-6pm on Mondays to Fridays only.

The relevant Evidence Base documents are (101) Hampstead Neighbourhood Plan – Policy BA3 and Application (134) RBKC Code of Construction Practice (pages 28-29)

UD 2 CONSTRUCTION MANAGEMENT PLANS

- i. High impact activities will be restricted to 9 am till 5.30 pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays.
High impact activities include:
 - a. Demolition, ground breaking and excavation works using percussive equipment.
 - b. Percussive piling operations and percussive pile reduction and pile break-out works.
 - c. Percussive and grinding power tools on party walls/floors of adjoining occupied properties.
 - d. Removal of clay and sub soil during excavation by means of conveyor belts, lorries, etc.
- ii. Deliveries and collections must take place between 9.30 am and 4.30 pm.

7.4 APPLICATION

Limits on hours of construction, high impact construction activity and collections and deliveries will be matters for planning conditions.

KR KIDDERPORE RESERVOIR

8.1 RATIONALE AND EVIDENCE

Kidderpore Reservoir was constructed in 1867 to store treated water extracted from the Thames at Hampton. It is a distinctive area of flat, open space in an area of high ground in the north west of the Plan Area.

In the event that the reservoir, and the land on which it is sited, becomes surplus to water supply operations (as with the nearby Gondar Gardens reservoir) the Plan seeks to preserve the site for the community.

At ground level, use as a nature reserve will achieve the Redington Frognal Vision and Objectives supported aim and help meet the Natural England Accessible Green Space Standards (ANGSt).

Supporting information is available in the ITV video embedded at:

<https://www.itv.com/news/london/update/2013-09-16/rare-victorian-brickwork-exposed/>

and in Evidence Base documents:

(102) Kidderpore Reservoir (and the Noble Adventures of Quackpot) - London - October 2013 | UK Draining Forum | 28DaysLater.co.uk

(103) Royal Commission on Water Supply – para. 118

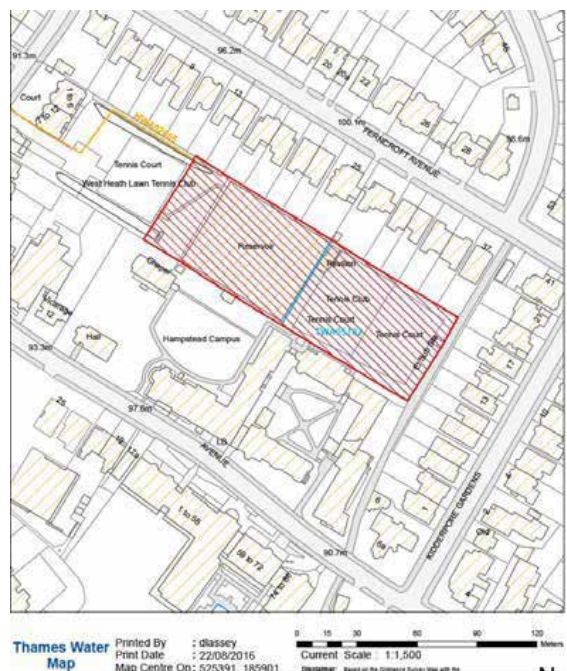
(104) Victorian Public Health | Tomb With a View

(105) Reservoir roof replacement reveals Victorian gem - WWT

(106) Kidderpore reservoir images

(122) Natural England ANGSt.

Kidderpore Reservoir Site Plan



Victorian Engineering Beneath Covered Water Reservoir



KR KIDDERPORE RESERVOIR

- i. Development must have no significant adverse impact on its architectural or historic interest of the structure, or on the contribution it makes to the special architectural or historic interest of the Redington Frognal Conservation Area.
- ii. Creative and sensitive adaptation of the reservoir is encouraged, in particular where it would create public access to the structure, with greening at ground level. Suitable uses may include a nature reserve in conjunction with commercial use below ground.
- iii. Development proposals affecting Kidderpore Reservoir will be supported, if they enable adaptation to create a biodiverse natural space.

8.2 APPLICATION

This policy recognises the heritage significance of the reservoir to the special interest of the Redington Frognal Conservation Area and protects that significance, whilst allowing for appropriate and biodiverse development to achieve the Redington Frognal Vision and Objectives supported aim and help to meet the Natural England Accessible Green Space Standards (ANGSt).

Potential uses for the underground water reservoir could include a:

- nature reserve
- sunken garden
- underground vertical farm to help meet the demand for sustainably, locally grown produce. The area beneath ground level could be ideal for by growing, for example, micro greens and salad leaves, using hydroponic systems and LED technology.

9. KEY DOCUMENTS

9.1 Non-Designated Heritage Assets for Local Listing

[/http://www.redfrogforum.org/draft-neighbourhood-plan-november-2019/](http://www.redfrogforum.org/draft-neighbourhood-plan-november-2019/)

9.2 Design and Landscape Guidance

<http://www.redfrogforum.org/draft-neighbourhood-plan-november-2019/>

9.3 Design Guidance for Possible Redevelopment Opportunities

<http://www.redfrogforum.org/draft-neighbourhood-plan-november-2019/>

9.4 List of Evidence Base documents underpinning the policies

<http://www.redfrogforum.org/evidence-base/>

9.4 EVIDENCE BASE DOCUMENTS UNDERPINNING THE POLICIES

Evidence base documents that underpin the policies are hosted on the Neighbourhood Forum website. These documents are listed below.

- (1) 2003 Redington Frognal Conservation Area Statement and Guidelines.pdf
- (2) AECOM Redington Frognal Heritage and Character Assessment, dated September 2015.pdf
- (3) National Planning Policy Framework, February 2019.pdf
- (4) Urban Greening Factor for London, The Ecology Consultancy.pdf
- (5) MHCLG National Design Guide, 1.10.19.pdf
- (6) Frognal and Fitzjohn's Ward Population Profile, 2011.xlsx
- (6) Natural Environment Guidance, MHCLG, 21.7.19.pdf
- (7) Frognal and Fitzjohn's Ward Population Profile, 2011.pdf
- (8 i) GLA Frognal and Fitzjohn's population projections.pdf
- (8 ii) ONS long trend 2017 base.pdf
- (8) GLA Frognal and Fitzjohn's population projections.xlsx
- (9) A Policy for Trees in Islington
- (9 i) Islington Tree Policy 2019
- (9 ii) Policy G7 Trees and woodlands | Draft New London Plan.
- (9 iii) RBKC Trees and Development
- (10) MHCLG Guidance Historic Environment.pdf
- (11) 28 Redington Road appeal decision 3164577.pdf
- (12 i) RedFrog Association Article 4 meetings with Camden, 2011, 2013.pdf
- (12 ii) Article 4 Direction Presentation, 13.4.11.pptx
- (13) Camden Planning Committee members' briefing 14.12.17.pdf
- (14) SD 3 Car-Free Development - rationale.pdf
- (15) APP/X5210/A/14/2213004 3 Fellows Road.pdf
- (16) APP/X5210/W/17/3178421 13 Fitzjohn's Avenue.pdf
- (17) Communities across England encouraged to nominate heritage assets.pdf
- (18) MHCLG Design Guidance.pdf
- (19) Brokenshire orders house builders to protect wildlife.pdf
- (20) Sustainable Development and Redington Frognal Character - recent harm.pdf

- (21) Neighbours' costs for 28 Redington Rd.pdf
- (22) Conservation Studio 28 Redington Road appeal representation - 18 May 2017.pdf
- (23) HCAAC objection to 36 Red Rd, 5.3.19.pdf
- (24) RedFrog NF objection - 36 Red Rd.pdf
- (25) HCAAC objection to 25-26 Redington Gardens.pdf
- (26) HHS objection 25 and 26 Redington Gardens.pdf
- (27) HHS objection, 24 Redington Gardens.pdf
- (28) Other objections to 25-26 Redington Gardens.pdf
- (29) Further objections to 25-26 Redington Gardens.pdf
- (30) Marketing brochure, 24 and 25-26 Redington Gardens.pdf
- (31) SD 5 Garden loss, Ordnance Survey.pdf
- (32) RF extensions 2010 to 28.10.17.pdf
- (33 i) RedFrog NF objection to 40b Hollycroft.pdf
- (33 ii) Neighbour objection to 40b Hollycroft.pdf
- (33 iii) HHS objection to 40 Hollycroft Redacted.pdf
- (33 iv) 40 Hollycroft site plan.pdf
- (33 ix) 14 Hollycroft after two and three rear extensions.pdf
- (33 v) 14 Hollycroft consented summer house, 2008.pdf
- (33 vi) 14 Hollycroft D&A - 2nd rear extension, 2008.pdf
- (33 vii) 14 Hollycroft summer house RedFrog Assn objection, 2016.pdf
- (33 viii) rear extensions near to 14 Hollycroft Avenue in 2015.pdf
- (33 x) 34 Hollycroft Design and Access Statement.pdf
- (33 xi) 34 Hollycroft Existing and Proposed Drawings.pdf
- (33 xii) 16 Hollycroft rear extension to match 14 Hollycroft.pdf
- (33 xiii) 16 Hollycroft EXISTING and PROPOSED rear extension.pdf
- (33 xiv) 16 Hollycroft, prior to rear extension, 22 July 2015.pdf
- (33 xix) 4-4A Lindfield Gardens summer house footprint.pdf
- (33 xv) 16 Hollycroft, post rear extension 23.8.18.pdf
- (33 xvi) 46 Hollycroft Avenue rear extension.pdf
- (33 xvii) Arkwright Road, garden loss 12.1.12.pdf
- (33 xviii) 9 Arkwright Road garden loss.pdf
- (33 xx) Lindfield Langland Neighbourhood Association re 4-4A Lindfield Gardens.pdf
- (33 xxi) HHS re 4-4A Lindfield Gardens_Redacted.pdf
- (33) SD 5 Examples of rear garden loss.pdf
- (34) LondonGardenCity, GiGL.pdf
- (35) CPG Altering and extending your home, March 2019.pdf
- (36) RF Association response to CPG Alterations and Extensions, 11.1.19.pdf
- (37) SD 6 Modern Suburban Houses by CHB Quennell.pdf
- (38) Historic England Making Changes to Heritage Assets.pdf

- (39) BGI The need for a biodiversity policy.pdf
- (40) Urban domestic gardens (IV)- the extent of the resource and its associated features.pdf
- (41) Blooming London – Greenspace Information for Greater London.pdf
- (42) Scaling up from gardens- biodiversity conservation in urban environments.pdf
- (43) Urban domestic gardens (IX)- Composition and richness of the vascular plant flora, and implications for native biodiversity.pdf
- (44) London Assembly Planning Committee – London Plan response, March 2018.pdf
- (45) House of Lords Select Committee on NERC 2006 – written and oral evidence .pdf
- (46) Benefits of restoring ecosystem services in urban areas.pdf
- (47) Spaces Wild, London Wildlife Trust.pdf
- (48) Camden Local Plan 2017.pdf
- (49) Managing flood risk in Camden.pdf
- (50) Sir William Pitt - 2007 Floods Review.pdf
- (51) Surface water - The biggest flood risk of all - GOV.UK.pdf
- (52 i) Ecology Network May 2016 Redington Frognal BAT_Redacted.pdf
- (52 ii) Gardens advice from The Ecology Network.pdf
- (52 iii) Ecology Consultancy Kidderpore Avenue Barratt site Bat Surveys, December 2012_Redacted.pdf
- (52 iv) Ecology Consultancy 25 Kidderpore Avenue Bat Survey, 12.2.14.pdf
- (52 v) Ecology Consultancy - King's College Halls - Bat Survey, December 2015_Redacted.pdf
- (52 vi) Ecology Network Bat Survey summary data - 17 Frognal, 25.6.18.pdf
- (52 vii) Bat hole and droppings, 7 Kidderpore Ave veteran oak 17.11.15.pdf
- (52 viii) 5 Templewood Av Arboricultural report - bat roost, 24.1.17.pdf
- (52 xix) 9 Kidderpore Ave Horse Chestnut bat hole and droppings, 17.11.15.pdf
- (52 xx) 25 Frognal BAT SURVEY, July 2012 - REDACTED.pdf
- (52 xxi) Bat Activity Survey - 25 Frognal, October 2018_Redacted.pdf
- (52 xxii) Frognal Gardens observations.pdf
- (52 xxiii) 17 Frognal gardener, 8 July 2018 _Redacted.pdf
- (52 xxix) Heysham Lane & Firecrest Woodland-Sightings and Nests.pdf
- (52 xxx) Firecrest sightings, June 2016_Redacted.pdf
- (52 xxxi) GiGL RedFrogSummary data, March 2019.pdf
- (52 xxxii) GiGL RedFrog_Factsheet, March 2019.pdf
- (52) BGI 1 Rear Gardens and Ecology – bat reports and other sightings.pdf
- (53) AECOM - Contribution of Trees to the Townscape.pdf
- (54) Nature Recovery Network report for DEFRA.pdf
- (55) Doses of Neighborhood Nature- The Benefits for Mental Health of Living with Nature .pdf
- (56) DEFRA house sparrow losses.pdf
- (57) WLGF policy support_Redacted.pdf
- (58) Original boundary 10a-11 Heath Drive 1933.pdf
- (59) Original Ferncroft Ave streetscape.JPG.pdf
- (60) Original Platt's Lane boundaries.pdf

- (61) BGI 3 TREE PLANTING AND PRESEVATION.pdf
- (61 i) 21 tree removals at Kidderpore north site - Barratt - tree survey 2008.pdf
- (61 ii) Sarum Chase notices of intent_Redacted.pdf
- (61 iii) Kings College north site boundary fellings.pdf
- (61 iv) 41 trees to be removed, King's College north site, 1.7.15.pdf
- (61 v) 2019-3087-T mature sycamore felled for garden building, 25.7.19.pdf
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- (65) Letter from Caroline Nash of The Ecology Consultancy to Seonaid Carr.pdf
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- (67) 'Nature Nearby' Accessible Natural Greenspace Guidance.pdf
- (68) Public Health England- Improving green space access.pdf
- (69 i) LGS 1 WHLTC.pdf
- (69 ii) LGS 2.pdf
- (69 iii) LGS 3.pdf
- (69 iv) LGS 4.pdf
- (69 v) LGS 5.pdf
- (69 vi) LGS 6.pdf
- (69 vii) LGS 7.pdf
- (69) BGI 5 Local Green Spaces support.pdf
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- (71) Youth Music Centre emails, 20.8.15 .pdf
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- (73) The Post Office Community Fund.pdf
- (74) TfL Town Centre Study, 2011.pdf
- (75) London's Foundations Final.pdf
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- (77) Arup Red Frog Sub-surface Water Features Mapping.pdf
- (78) Can the Laws of Nature and Land Coexist in a Basement, 19.9.18.pdf
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- (90) Recent downstream surface water flooding.pdf
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- (92) RedFrog-Spring-line-map.pdf
- (93) Spring line sinkhole.pdf
- (94) Arup Figure 7 - Results Map (Rev F3 21.5.16).pdf
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- (98) Evidence to DCLG inquiry 6.1.17.pdf
- (99) Ham and High - basement assessment problems, 14.1.16.pdf
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- (101) Hampstead Neighbourhood Plan, 2018.pdf
- (102) Kidderpore Reservoir (and the Noble Adventures of Quackpot) - London - October 2013 | UK Draining Forum | 28DaysLater.co.uk.pdf
- (103) Royal Commission on Water Supply, para. 118.pdf
- (104) Victorian Public Health | Tomb With a View.pdf
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- (107) Environment Bill, 15.10.19.pdf
- (108) Camden Streetscape Design Manual, November 2000.pdf
- (109) Our Camden Plan.pdf
- (110) Camden 2025.pdf
- (111) Building Better Beautiful Commission - interim report, 9.7.19.pdf
- (112) MHCLG Natural Environment Guidance, 21.7.19.pdf
- (113) London Plan Policy G5 Urban Greening Factor.pdf
- (114) CF 1 Role of Tertiary Education and Cultural Facilities in Redington Frognal.pdf
- (115) Cultural, Leisure, Tertiary Education and Community Facilities Need.pdf
- (116) FR Heritage and Character of Finchley Road.docx
- (116) FR Heritage and Character of Finchley Road.pdf
- (117) CF 2 Community Infrastructure Priorities.docx
- (117) CF 2 Community Infrastructure Priorities.pdf
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- (120) TfL Healthy Streets for London.pdf
- (121) TfL SUDs in London, 2016.pdf
- (122) Natural England ANGSt.pdf

- (123) NW Leicestershire Shop Fronts SPD.pdf
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- (131) RedFrog Vision and Objectives Brochure.pdf
- (132) Vision & Objectives Survey Data_All_151206.pdf
- (133) Camden Planning Guidance – Biodiversity
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- (139) West Heath Road and Telegraph Hill - painting by RF McIntyre
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- (142 i) 3 Greenaway Gardens car lift - HHS objection
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GLOSSARY

Amenity. A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

Appearance. The aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture. (As defined in article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015).

Article 4 Direction. A direction which withdraws automatic planning permission granted by the General Permitted Development Order for some or all permitted development rights, for example within a conservation area or curtilage of a listed building. Article 4 directions are issued by local planning authorities.

Backland development. Development of 'landlocked' sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.

Basement development: the construction or extension of one or more storeys of accommodation below the prevailing ground level of a site or property.

Biodiversity. The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

Biodiversity net gain. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development.

Buffer zone: a transitional area situated between biodiverse land and less biodiverse habitat.

Building type. Buildings differentiated by form, use, interior and exterior layout in relation to streets, public spaces and other buildings.

Built environment. The entire ensemble of buildings, neighbourhoods and cities and associated infrastructure.

Car free: no cars or motor vehicles to be accommodated within the plot curtilage (nor in a basement).

Character. A term relating to Conservation Areas or Listed Buildings, but also to the appearance of any rural or urban location in terms of its landscape or the layout of streets and open spaces, often giving places their own distinct identity

Community Infrastructure Levy (CIL). A charge made on new development to raise money for new infrastructure in the area, related in scale and kind to the development. In London, planning applications must pay a Mayor's CIL for spending by the Mayor on roads or other transport facilities (notably Crossrail). London boroughs can set a local CIL based on its own needs. Ealing has set a rate to meet the requirements of its Infrastructure Delivery Plan.

Conservation: the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance⁹, of the significance of the Redington Frognal Conservation Area, is the principal heritage policy objective reflecting the statutory duty which must be accorded considerable importance and weight.

Source: DCLG, National Planning Policy Framework (NPPF) 2012 – Annex 2 and

<http://planning.islington.gov.uk/NorthgatePublicDocs/00394021.pdf> (page 1)

Conservation Area. An area "of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance." (s69(1)(a) Planning (Listed Building and Conservation Areas) Act 1990). It is the duty of the Local Authority to designate such areas and to use their legal powers to safeguard and enhance their special qualities.

Conversions. The sub-division of residential properties into self-contained flats or maisonettes.

Cumulative Impact. A number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local community or economy.

Density. In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

DEFRA. Department for the Environment, Food and Rural Affairs.

Design Code. A set of illustrated design rules and requirements which instruct and advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision for a site or area.

Designated heritage asset. This includes Listed Buildings, Conservation Areas and assets identified by the local planning authority (including local listing), designated under the relevant legislation. Because of their heritage interest, they are identified as having a degree of significance meriting consideration in planning decisions.

Detailing: the degree to which architectural enrichment is used, these examples do not indicate copying of past features other than in repairs and renewals of existing but possible aims for investing character in otherwise flat featureless modern building.

No detailing. limited use of architectural features;

Low detailing: equivalent level of restrained detail to the Georgian period;

Medium detailing: equivalent to mid Victorian period of general embellishment of building elevations;

High detailing: equivalent to the exuberance and richness of sculptural details of the late Victorian or Edwardian periods.

Development. This includes new development, extensions and alterations to existing buildings and garden buildings.

Ecological network. A network of natural, semi-natural and man-made green spaces, such as parks, gardens, allotments, river banks, ponds, woodlands, private and street trees, tree corridors, hedges, green roofs, green walls, green bridges, that support natural and ecological processes, as well as providing benefits for human health and wellbeing.

Elevation. The actual facade (or face) of a building, or a plan showing the drawing of a facade.

Flight path. The route taken by birds and bats between destinations.

Green corridor. Relatively continuous areas of open space leading through the built environment, which may link to each other and the Green Belt or Metropolitan Open Land. They often consist of.....extensive areas of private gardens.

Green infrastructure. A network of multi-functional green space, including private gardens, which is capable of delivering a wide range of environmental and quality of life benefits for local communities and biodiversity.

Habitat. An area of nature conservation interest.

Heritage asset. A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. 'Heritage asset' includes designated heritage assets and assets identified by the local planning authority (including local listing). (NPPF Annex 2, Glossary).

Infill development: development within the Plan area that "fills" in a gap between the existing built form.

Local Green Space (LGS). A green area of particular importance to a local community designated as such through a local development plan or neighbourhood development plan. (NPPF paras 76 & 77.)

London Plan. The London Plan 2018 is the latest version of the Mayor's overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.

MHCLG. Ministry of Housing, Communities and Local Government.

National Planning Policy Framework (NPPF). The national planning policy document which sets out the Government's planning policies for England and how these are expected to be applied.

Non-designated heritage asset. Buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions

but which do not meet the criteria for designated heritage asset. The Mayor of London includes veteran trees within this definition.

Open space. All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Original building. An original building is defined in the National Planning Policy Framework as “a building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.” <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2->.

Most buildings in the Plan Area date from the Victorian and Edwardian era.

Over-development. An amount of development (for example, the quantity of buildings or intensity of use) that is excessive in terms of impact on local amenity and character.

Overlooking. The effect when a development or building affords an outlook over adjoining land or property, often causing loss of privacy.

Overshadowing. The effect of a development or building on the amount of natural light presently enjoyed by a neighbouring property, resulting in a shadow being cast over that neighbouring property.

Permeable surface. A surface that allows water to percolate into the soil to filter out pollutants and recharge the water table.

Public realm. Those parts of a village, town or city (whether publicly or privately owned) available, for everyone to use. This includes streets, squares and parks.

Public Transport Accessibility (or Access) Level (PTAL). The generally used measure of connectivity to the public transport network in London. The PTAL value combines information about how close public transport services are to a site and how frequent these services are. The highest level of connectivity has a PTAL of 6b and the lowest has a PTAL of 0.

Public space. A publicly or privately owned green and/or hard landscaped space that is available, without charge, for everyone to see, use and enjoy.

Roofscape. A view of roofs, particularly in terms of its aesthetic appeal.

Setting of a heritage asset. The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy). The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

Site of Importance for Nature Conservation (SINC): Sites of Importance for Nature Conservation are areas that are deemed high in a biodiversity and substantive conservation context. They are vital for enabling the planning system to recognise and thus protect or enhance areas of substantive nature conservation value outside the limited network of statutorily protected SSSI (Sites of Special Scientific Interest).

Soggy garden: a garden where wet ground conditions are observed, at least on a seasonal basis, and which has a tendency to become waterlogged.

Stepping stones: pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

Street: a movement system allowing connectivity across an area onto which buildings or public spaces face. Streets are primarily public but include front gardens, pavements or shared surfaces.

Streetscape. The appearance of all of the elements of a street, including the carriageway, pavement, street furniture, planting, and the buildings or structures along its edges, particularly the front boundary treatments, trees and hedges and vegetation on each side of the street.

Tree corridor: a line of trees along or close to the boundary of one or more adjoining gardens.

Tree Preservation Order (TPO): a mechanism for securing the preservation of single or groups of trees

of acknowledged amenity value. A tree subject to a tree preservation order may not normally be topped, lopped or felled without the consent of the local planning authority.

Underground development: construction or extension of one or more storeys of accommodation below the prevailing ground level of a site or property.

View: a sight or prospect from a particular position. Views are one way in which heritage assets and an area's character and sense of place are experienced. (Historic England - Seeing the history in the view.)

Vernacular: the way in which buildings were built in a particular place, making use of local styles, techniques and materials.

Veteran tree: a tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage. They are referred to as non-designated heritage assets in the new London Plan.

Walkable distance. A maximum walkable distance is defined by the Chartered Institute of Highways and Transportation as 1.2 kilometres.

Wildlife corridor, habitat corridor, or green corridor: an area of habitat connecting wildlife populations separated by human activities or structures (such as roads, and development). This allows an exchange of individuals between populations, which may help prevent the negative effects of inbreeding and reduced genetic diversity (via genetic drift) that often occur within isolated populations.

Corridors may potentially moderate some of the worst effects of habitat fragmentation where urbanisation divides habitat areas, causing animals to lose both their natural habitat and the ability to move between regions to use all of the resources they need to survive. Habitat fragmentation due to human development is an ever-increasing threat to biodiversity, and habitat corridors are a possible mitigation.

Will, shall, or should. Uses in this Plan are as follows:

- 'Will' means a firm intention or obligation. eg "the Local Authority will keep records", or "development will be required to produce plans".
- 'Shall' (or 'must') is used to show or create an enforceable obligation or duty on another person to act (or not) in a certain way. "The applicant shall produce evidence of ownership" or "Plans must show".
- 'Should' does not carry the same total obligation, and is weaker than 'will' or 'shall'. It suggests a responsibility for or desirability of something which can be subject to judgement or modification, but when decisions are made on planning applications will still be a material consideration, eg. "Development should replace existing trees and plantings...", as in "You should not park your car near the school gates".