

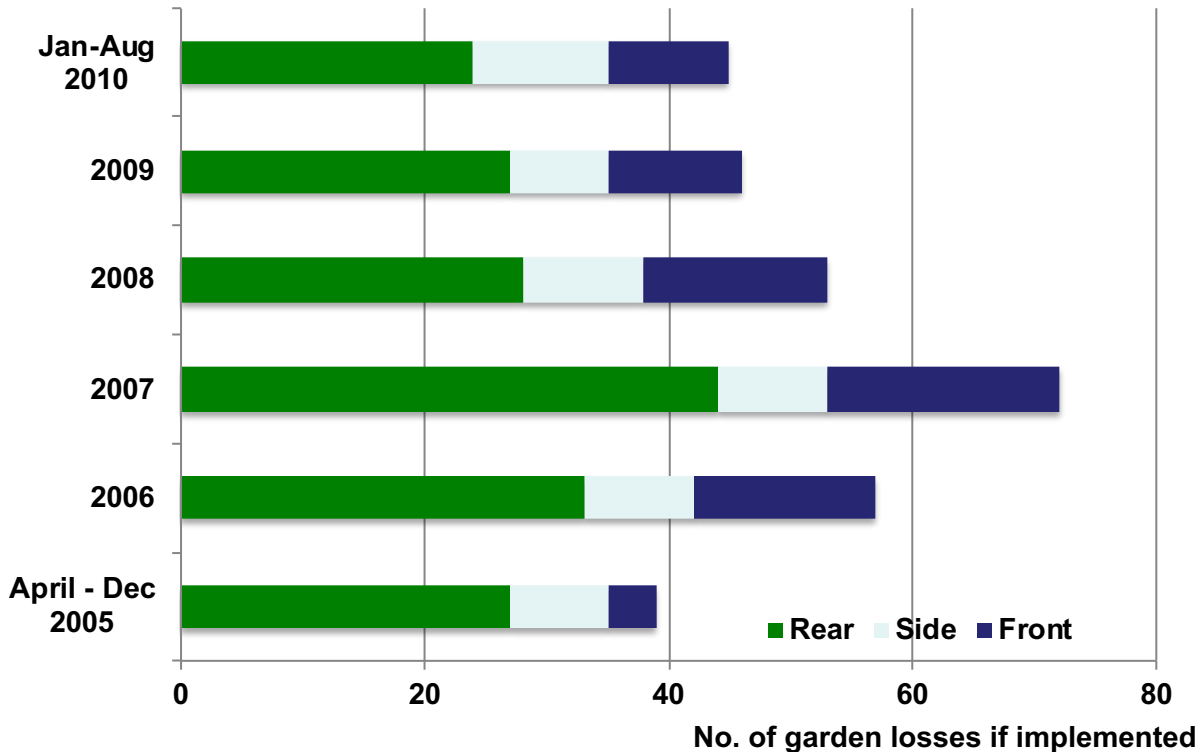
## The current situation in RedFrog

# The RedFrog C.A. occupies a special position, contributing to Camden's green space

- ❑ The many and large gardens in RedFrog form an important green corridor, with trees, hedges and lawned areas, connecting to Hampstead Heath.
- ❑ This is key to supporting biodiversity and is home to wildlife including bats, owls, toads, dragonflies, wrens, song thrushes and other species.
- ❑ Residents have been concerned that RedFrog's greenery is being lost to development (eg Sarum Chase at Telegraph Hill) and that this is adversely affecting biodiversity.
- ❑ We have therefore conducted the research which follows and we also plan to organise a wildlife audit which we shall submit to Greenspace Information for Greater London to be collated.

# In just over 5 years there has been a very serious loss of gardens

## Planning Consents Likely to Lead to Garden Losses, April 2005 to August 2010



Source RedFrog based on camden.gov.uk

- RedFrog estimates that between April 2005 and August 2010 Camden granted **more than 300 consents** which would cause **serious losses to the green space** of the RedFrog conservation area (if implemented).
- The **cumulative impact is even more damaging** to the conservation area's remaining green space.
- Of the consents granted:
  - 183 (59%) were for **rear garden** development
  - 55 (18%) were for **side garden** development
  - 74 (24%) were for **front garden** development.

# Garden development activity is primarily due to single dwelling houses

- **Permitted development rights** for single dwelling houses are overwhelmingly responsible for the loss of RedFrog's gardens:
  - almost **80% of all planning consents** involving garden losses related to development activity by **single dwelling houses**
- In particular, the relatively large **rear gardens** are being exploited to facilitate substantial development activity.
- Rear garden developments include:
  - extensions to existing rear extensions
  - swimming pools and paved surrounds
  - hard surfaced areas, such as decking and large patios
  - tennis and basketball courts
  - cinemas
  - “summer houses” and other buildings.
- Such developments are **urbanising** the conservation area's former green, vegetated nature and are **at the expense of wildlife habitat**.

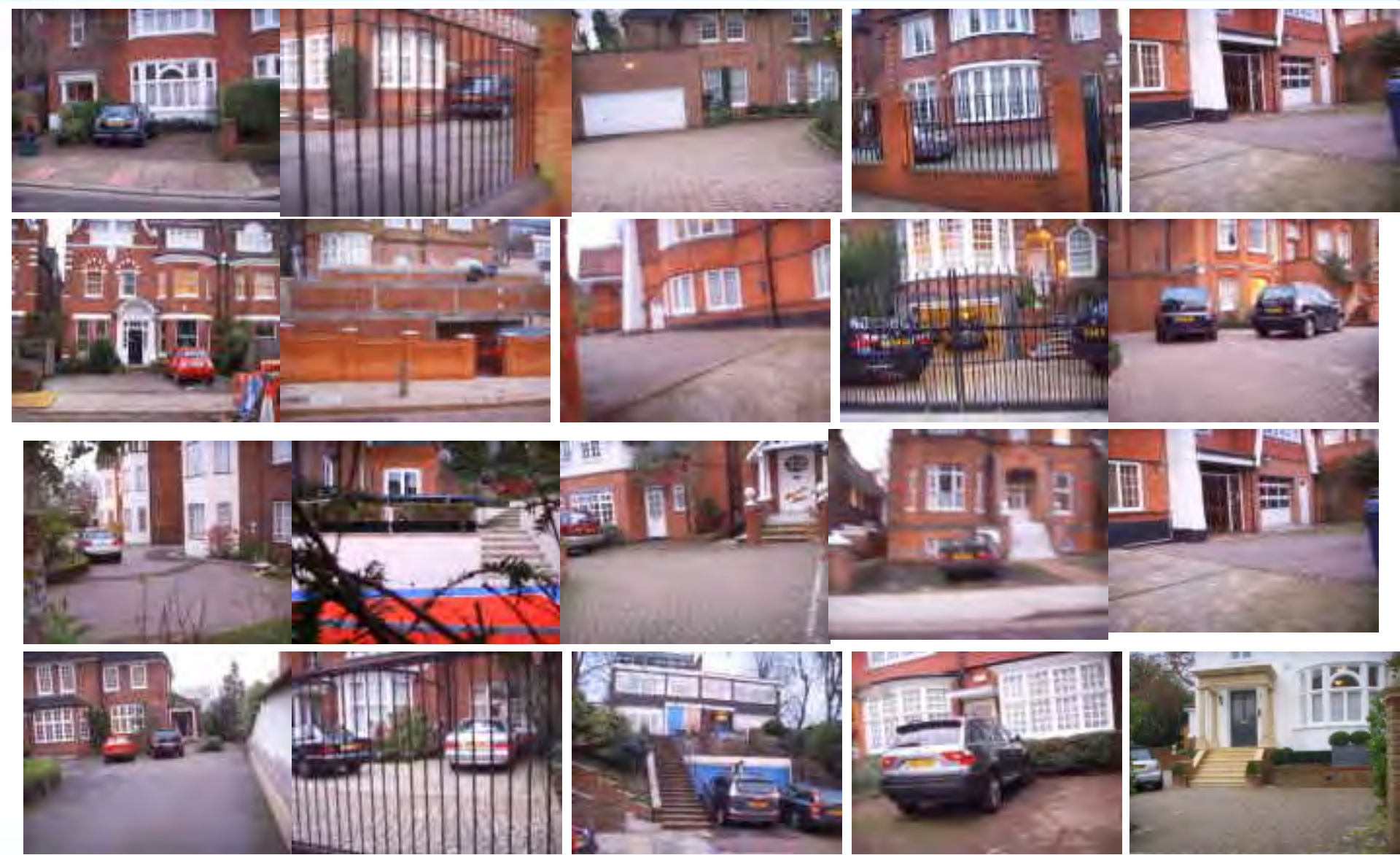


The “acceptable” diagram (p.100 of *Camden Planning Guidance 2006*) with a minimum of 50% landscaping



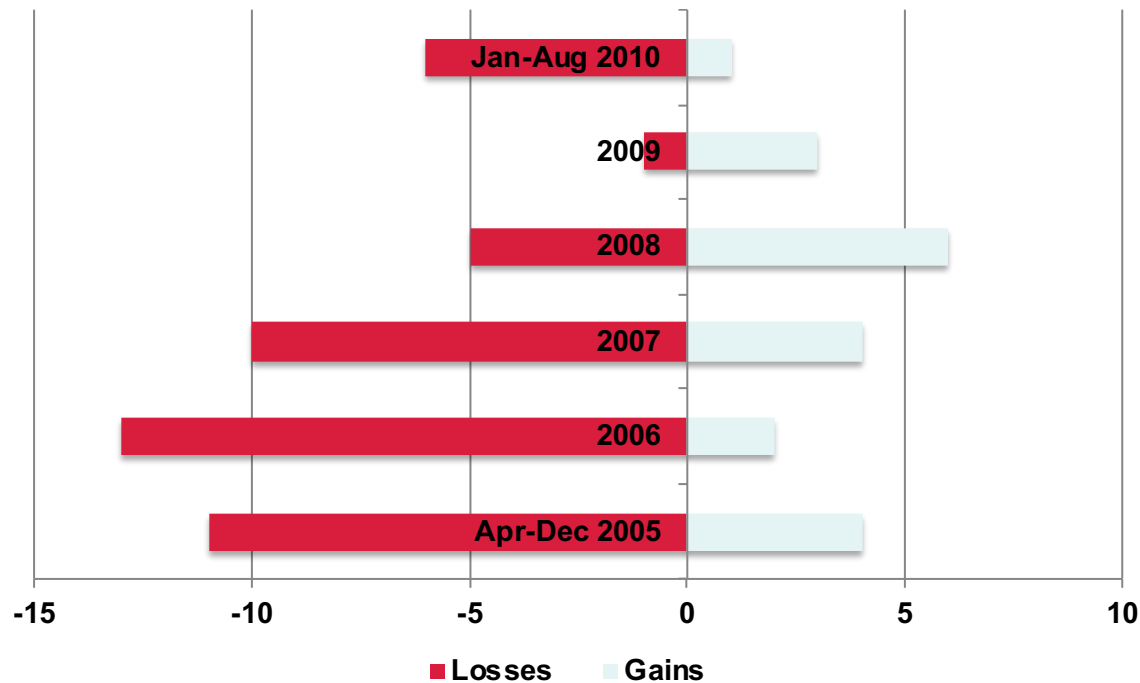


Some front gardens which have been converted to hardstandings - i.e. the “unacceptable” diagram on p.100 of *Camden Planning Guidance 2006*



# Loss of gardens has been accompanied by a reduction in the number of residential dwelling units

## Planning Consents Entailing Losses or Gains in the Number of Residential Units, April 2005 to August 2010



Source RedFrog based on camden.gov.uk

The 62 consents granted, which entailed a change in the number of dwellings, would have led to:

- The loss of 46 residential units and the gain of only 20 units,
  - equivalent to an average net loss of 4.8 units per year.

Camden has various policies which support the retention and conservation of green space

1. Camden *Core Strategy Proposed Submission 2009*
2. Camden *Development Policies Publication Draft 2009*
3. Camden *Biodiversity Action Plan and Delivering a Low Carbon Camden*
4. Camden *Conservation Area Statement and Guidelines for Redington Frogna*
5. The solution



# The need to conserve and maximise wildlife habitat and diversity

- Many policies relating to the importance of conserving gardens are contained in the *Camden Core Strategy Proposed Submission 2009*:
  - CS 13 - Tackling climate change and improving and protecting Camden's environment and quality of life:
    - 13.13 - 13.14 Adapting to climate change:
      - ✓ “We will continue to protect our open spaces and other green spaces, where possible and seek to create additional open spaces. We will also continue to protect the borough's trees and encourage the creation of green and brown roofs and green walls....”
  - CS 14 - Promoting high quality places and conserving our heritage:
    - 14.18:
      - ✓ “High quality landscaping.....brings trees and other greenery into built-up areas to relieve the hard landscaping and provide shade, and provide habitats for wildlife.” “We will encourage appropriate use of landscaping in the form of....'green walls' which have a number of environmental benefits (eg in providing wildlife habitats, in helping to cool and insulate buildings and in retaining water, helping to reduce flooding), as well as being visually attractive”.
  - CS 15 - Protecting and improving our parks and open spaces and encouraging biodiversity:
    - ✓ “e) protecting other green areas with nature conservation value, including gardens, where possible”
    - ✓ 15.10 “The Council wants to promote a green network approach to open space, where open spaces are connected by landscaped corridors or habitat corridors.”
    - ✓ 15.17 “Where possible we will also protect an amount of green space or garden space.”
    - ✓ 15.19 “Developers and landowners should also give consideration to the need for species to move between different types of habitats which will help these species to cope with the effects of climate change. We will continue to retain habitats and corridors in the borough.”
    - ✓ 15.21 This notes the aesthetic, habitat, shading, cooling and air filtering importance of trees, and the desirability of tree and vegetation planting.

- The importance of Camden's gardens is also recognised in the *Camden Biodiversity Action Plan*:
  - Para 3.2 notes that there are large private gardens and that (p.38) **private gardens are “vital for biodiversity”**.  
Local research in 1981 estimated that 33% of Camden consisted of houses and gardens.
  - Para 4.2 notes the loss of garden area “for off-road parking and extensions”
  - Policy EN15 makes reference to the greening of buildings (4.46) and notes opportunities for **green roofs** for new buildings. Page 106 of *Delivering a Low Carbon Camden* also cites green roofs as a “high priority”.

- The problem of private off-street parking is addressed in Development Policy 19.8 in the Camden *Development Policies Publication Draft 2009*:
  - “Off-street parking can cause environmental damage in a number of ways. Trees, hedgerows and boundary walls are often the traditional form of enclosure.....especially in conservation areas. This form can be broken by the ...imposition of extensive areas of paving and parked cars...” “ Large areas of paving also increase the speed of water run-off (especially when formerly porous surfaces such as front garden planting areas are repaved).”
  - Map 2: Flood Risk. This Environment Agency map shows that a number of roads in RedFrog have previously been flooded.

# Conservation Area Statement - Redington Froggal

- The Redington Froggal Conservation Area Statement (2006) contains many Guidelines setting out guidance for development:
  - RF1 “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.**”
  - RF8 “Alterations to the front boundaries ...can dramatically affect and harm the character of the Conservation Area. Boundaries in the Conservation Area are predominantly formed by walls, either with railing or hedges.” “**Particular care should be taken to preserve the green character of the Conservation Area by keeping hedges.**” “Furthermore, the loss of front boundary walls facilitates the parking of vehicles....which would adversely affect the setting of the building and the general street scene.”
  - RF 9 “The Council will **resist any further loss of front boundary walls and conversion of front gardens to into hardstanding parking areas.**”
  - RF 35 “**All trees which contribute to the character or appearance of the Conservation Area should be retained and protected.**”



# Development in RedFrog has contravened Camden's policies

- ❑ Camden has largely been unsuccessful in protecting RedFrog from the loss of garden space - front, side and rear - due to “permitted development” under the terms of the General Development Orders for single family dwellings.
- ❑ RedFrog is now seeking to:
  - slow down the loss of green space and wildlife habitat that occurs with building in gardens. The re-designation of gardens as greenfield land suggests that this approach would meet with government approval.
  - preserve the balance of family housing by resisting the loss of family flats in RedFrog through conversion to very large single houses, which is also very often accompanied by building in gardens.
- ❑ Both of these objectives are well supported by Camden policy but are undermined by “permitted development”.

Camden also has policies aimed at ensuring a mix of housing

## Preferred Approach CS4 - Providing quality homes

- ❑ “maximising the overall supply of additional housing to meet or exceed Camden’s target of 5,950 homes from 2007-2017”
- ❑ “preventing the loss of existing homes”
- ❑ “having regard to the housing needs and accommodation types suitable for different groups, including families, older people..... young adults.....”
- ❑ “seeking a mix of housing in terms of size and affordability”.

“The Council’s preferred approach is to seek a balanced housing stock with both large and small units, which promotes mixed and balanced communities. This is consistent with PPS3 which states that Local Planning Authorities should plan for the full range of market housing .....”. “There is demand for homes of a range of sizes in Camden, not just larger homes, as demonstrated by the Camden Housing Needs Survey 2008”.

## Alternative option

- Promote the provision of smaller homes rather than larger homes suitable for families.
- Allow flats to be converted into larger homes throughout the borough.

## Reason option was not chosen

- The Council’s preferred approach is to **seek a balanced housing stock with both large and small units**, which promotes mixed and balanced communities. This is consistent with PPS3 which states that Local Planning Authorities should plan for the full range of market housing ..... There is demand for homes of a range of sizes in Camden, including larger homes suitable for families, as demonstrated by the Camden Housing Needs Survey 2008.
- This option would increase the number of homes suitable for families in the borough. However, **the Council would not be able to ensure that larger properties are occupied by families rather than smaller, more affluent households**. The option would reduce housing choice in the borough by reducing the total number of homes available..... In addition, **when homes are lost through combining flats into larger homes, more homes will have to be provided on the borough’s limited number of housing sites** to meet Camden’s housing target of 595 homes each year.



## Policy DP2: Making full use of Camden's capacity for housing

- The Council will seek to minimise the loss of housing in the borough by....resisting developments that would involve the net loss of two or more homes, unless they create large homes in a part of the borough with a relatively low proportion of large dwellings.

## Policy DP5: Homes of different sizes

- The Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. We will seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace.

Development Size Priorities Table

	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4 or more bedrooms	Aim
Market sector		<b>Very high</b>	Medium	Medium	<b>40% 2-bed</b>

The solution

- Article 4 Directions should be implemented to remove “permitted development” rights and **require planning consent to be obtained for** applications for:
  - **conversion from flats to a single dwelling** of a building over 250m<sup>2</sup> gross area
  - **building extensions or garden structures** occupying over 10% of the gross area of rear and side gardens
  - **reductions of green space in front gardens (by paving etc.) to below 60% of total area of front garden**
  - the removal or significant reduction of existing **front boundary hedges**.

# and by the re-adoption of existing supplementary Guidelines as “material considerations” and an update to the Redington Froggal Conservation Area Statement

Guide-line	Existing	Suggested New Wording
RF1	<p>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 unlikely to be acceptable.</p>	<p>Rear <b>and side</b> gardens contribute to the townscape of the Conservation Area and provide a significant amenity to residents and a <b>wildlife habitat and corridor</b>. Development <b>within rear and side gardens - including building extensions or garden structures occupying over 10% of the gross area of rear and side gardens</b> – is unlikely to be acceptable.</p>
RF8	<p>Alterations to the front boundaries between the pavement and houses between the pavement and houses can dramatically affect and harm the character of the Conservation Area. Boundaries in the Conservation Area are predominantly formed by walls, either with railing or hedges. The original features of the boundaries may vary. 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.</p>	<p>Alterations to the front boundaries between the pavement and houses between the pavement and houses can dramatically affect and harm the character of the Conservation Area. Boundaries in the Conservation Area are predominantly formed by walls, either with railing or hedges. The original features of the boundaries may vary. 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 <b>incorporate front boundary hedges and</b> 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 <b>and hedges</b> 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.</p>



# Redington Froggal Conservation Area Statement - Guidelines contd. (i)

Guide-line	Existing	Suggested New Wording
RF9	The Council will resist any further loss of front boundary walls and conversion of gardens into hardstanding parking area.	The Council will resist any further loss of front boundary walls <b>and existing hedges and the</b> conversion of gardens into hardstanding parking area.
RF22	Planning permission is usually required for the erection of a rear extension or conservatory. However, modest single-storey extensions to a single family dwelling may be exempt from permission under the General Permitted Development Order 1995 depending on the proposed volume and height. It is advisable to consult the planning service to confirm if this is the case.	Planning permission is usually required for the erection of a rear extension or conservatory. However, modest single-storey extensions to a single family dwelling, <b>occupying less than 10% of the gross area of a rear or side garden</b> , may be exempt from permission under the General Permitted Development Order 1995 depending on the proposed volume and height. It is advisable to consult the planning service to confirm if this is the case.
RF23	Extensions and conservatories can alter the balance and harmony of a property or of a group of properties by insensitive scale, design or appropriate materials. Some rear extensions, although not widely visible, so adversely affect the architectural integrity of the building to which they are attached that the character of the Conservation Area is prejudiced. Rear extensions should be as unobtrusive as possible and should not adversely affect the character of the building or Conservation Area. In most cases such extensions should be no more than one storey in height, but its general effect on neighbouring properties and Conservation Area will be the basis of its suitability.	Extensions and conservatories can alter the balance and harmony of a property or of a group of properties by insensitive scale, design or appropriate materials. Some rear extensions, although not widely visible, so adversely affect the architectural integrity of the building to which they are attached that the character of the Conservation Area is prejudiced. Rear extensions should <b>occupy less than 10% of the gross area of a rear garden and</b> be as unobtrusive as possible and should not adversely affect the character of the building or Conservation Area. In most cases such extensions should be no more than one storey in height, but its general effect on neighbouring properties and Conservation Area will be the basis of its suitability.

# Redington Froggal Conservation Area Statement - Guidelines contd. (ii)

Guide-line	Existing	Suggested New Wording
RF32	<p>Planning permission may be required for the erection of side extensions. Modest single-storey extensions to single family dwellings may be exempt from permission under the General Permitted Development Order 1995 depending on the proposed volume and height and location. It is advisable to consult the planning service to confirm if this is the case.</p>	<p>Planning permission may be required for the erection of side extensions. Modest single-storey extensions to single family dwellings, <b>occupying less than 10% of the gross area of a side garden</b>, may be exempt from permission under the General Permitted Development Order 1995 depending on the proposed volume and height and location. It is advisable to consult the planning service to confirm if this is the case.</p>
RF33	<p>The Conservation Area is characterised by significant and well-preserved gaps between buildings providing views through to rear mature gardens. Normally the infilling of gaps between buildings will be resisted where an important gap is compromised to the symmetry of the composition of a building would be impaired. Where side extensions would not result in the loss of an important gap they should be single storey and set back from the front building line.</p>	<p>The Conservation Area is characterised by significant and well-preserved gaps between buildings providing views through to rear mature gardens. Normally the infilling of gaps between buildings will be resisted where an important gap is compromised to the symmetry of the composition of a building would be impaired. Where side extensions would not result in the loss of an important gap <b>and occupy less than 10% of the gross area of the side garden</b>, they should be single storey and set back from the front building line.</p>
RF34	<p>Any person wishing to do works to a tree, such as pruning or felling, must give the Council six weeks notice of the works before it is carried out. If a tree is subject to a Tree Preservation Order the Council has eight weeks to process the application. Further advice is available from the Tree Office on 020 7974 5616. The Council will consider the removal of existing trees only where necessary for safety or maintenance purposes or as part of a replanting / nature conservation programme.</p>	<p>Any person wishing to do works to a tree, such as pruning or felling, must give the Council six weeks notice of the works before it is carried out. If a tree is subject to a Tree Preservation Order the Council has eight weeks to process the application. Further advice is available from the Tree Office <b>and the Nature Conservation Manager</b>. The Council will consider the removal of existing trees only where necessary for safety or maintenance purposes or as part of a replanting / nature conservation programme.</p>

# Redington Frogal Conservation Area Statement - Guidelines contd. (iii)

Guide-line	Existing	Suggested New Wording
RF35	<p>All trees which contribute to the character or appearance of the Conservation Area should be retained and protected. Developers will be expected to incorporate any new trees sensitively into the design of any development and demonstrate that no trees will be lost or damaged before, during and after development. BS 5837: 1991 shall be taken as the minimum standard for protection of trees.</p>	<p>All trees which contribute to the character, <b>biodiversity</b> or appearance of the Conservation Area should be retained and protected. Developers will be expected to incorporate any new trees, <b>preferably native species</b>, sensitively into the design of any development and demonstrate that no trees will be lost or damaged before, during and after development and that an existing wildlife corridor will not be harmed. BS 5837: 1991 shall be taken as the minimum standard for protection of trees.</p>
RF36	<p>All new development should have a high standard of external space (landscape) design, which should respect the character and appearance of the Conservation Area.</p>	<p>All new development should have a high standard of external space (<b>soft landscape</b>) design, which should respect the character and appearance of the Conservation Area <b>and enhance opportunities for biodiversity</b>.</p>
RF37	<p>Applications for development should take into account the possible impact on trees and other vegetation, and state clearly whether any damage / removal is likely and what protective measures are to be taken to ensure against damage before, during and after development. BS 5837: 1991 shall be taken as the minimum standard for protection of trees. All trees within 10 metres of a development proposal should be clearly identified. This also applies to underground development. A separate Council leaflet is available on Trees.</p>	<p>Applications for development should take into account the possible impact on <b>wildlife</b>, trees and other vegetation, and state clearly whether any damage / removal is likely and what protective measures are to be taken to ensure against damage before, during and after development. BS 5837: 1991 shall be taken as the minimum standard for protection of trees. All trees within 10 metres of a development proposal should be clearly identified. This also applies to underground development. A separate Council leaflet is available on Trees.</p>