

REDINGTON FROGNAL
NEIGHBOURHOOD FORUM

Examination Questions

3. The Glossary provides a helpful distinction between the meanings of "Will", "Shall/Must" and "Should". My initial assessment is that there are many instances when the Plan uses "must" when "should" is more appropriate. I note that Camden Council makes similar comments. I should welcome details of any consideration that has been given to this issue during the preparation of the Plan.

Use of 'must' or 'should' has been carefully considered. "Must" has been used where the policy sets clear requirements for development to meet, and would be unsustainable unless they are met. This is important for clarity and to ensure that the policies are effective in practice. It is the current lack of clarity that has led to the grant of harmful planning consents causing a steady erosion of Conservation Area character. The use of "must" is intended to provide this much-needed clarity.

The word 'should' is used where certain practices are encouraged, but binding requirements are not considered necessary.

4. Is it the intention that Policy SD 4 applies to all development or only residential development?

It is important that all development complements the distinctive character of the Redington Froggnal area. [The Neighbourhood Plan and Conservation Area are virtually congruent.]

5. Is there any further information or evidence to clarify the meaning of "*significant reduction*" in Policy SD 5 iii?

The garden suburb character of the Conservation Area is described in the new *Redington Froggnal Conservation Area Character Appraisal and Management Plan, May 2020*. Section 3.4 Townscape and Landscape Character notes the importance of front and rear gardens and gaps between properties providing green views to the garden suburb character of the Conservation Area. The landscape is part of the "special architectural or historic interest and character of the conservation area", which is "characterised by smaller front gardens and extensive rear gardens" and "Street trees, garden trees, hedges and sometimes extensive rear gardens are important characteristics of the area."

An extract is copied below from the 2020 Character Appraisal and Management Plan:

Front garden parking: The most serious form of harm in the Conservation Area is through removal of front boundary walls or hedges and hard-surfacing of front gardens to create parking courts. In some properties, the surfacing materials are at odds with the established character, for example asphalt. Also, hedges are sometimes being replaced by metal gates or raisings. This creates hard urban frontages, which causes considerable harm to the garden suburb character of the area.

Loss of rear gardens: Loss of rear garden space and the open character of rear gardens through rear extensions, swimming pools, large garden buildings and excessive hard surfaced areas. Some of these have involved loss of trees.

Boundary treatments: Some front and side boundaries have had low walls, railings or hedges removed and replaced by higher timber fences or unsympathetic metal railings. In some properties, garages have been constructed near to or on the boundary of road frontages, often with large metal doors.

Source: Redington Frogna Conservation Area Character Appraisal and Management Plan, 2020

In the context of the Conservation Area, gardens are significant assets and great weight should be given to their conservation. Gardens are also of importance to the settings of the non-designated heritage assets and recent case law has reinforced the importance of setting (The Queen on the application of James Hall and Company Limited - and - City of Bradford Metropolitan District Council -and- Co-Operative Group Limited (1) Dalehead Properties Limited (2)).

However, the London Environment Strategy notes (on page 13) that,

“As development encroaches on open space and gardens have increasingly been paved over, there has been a gradual loss of green space across London in recent years.”

The evidence for the RedFrog area is that the pace of garden loss is continuing and accelerating, as gardens are increasingly used for development, including under Permitted Development rights. Some examples of more recent garden development are attached.

Environmental Impact of Decision Making

Revised Camden Constitution, September 2020

Article 14.02 (page 51) of Camden's new Constitution requires that,

“When taking any decision that may have an environmental impact, the Council will consider the likely environmental consequences of the relevant decision. This will include making the most of opportunities to minimise negative impacts, to enhance the natural environment, and to act to mitigate and adapt to climate change, recording and detailing that consideration within the decision-making report.”

Gardens for Cooling

The Friends of the Earth study of England's Green Space Gap rates local authorities according to access to green space, with category E being the most green space deprived.

Camden is rated the 13th most deprived borough in the whole of England in terms of E rated neighbourhoods. Of the 28 neighbourhoods in Camden, 21 are rated E (most deprived) in terms of green space deprivation by and 4 are rated D, including the area which most closely corresponds to the Redington Froggnal Neighbourhood Plan area. It is calculated that 64% of the population are without green space access.

Local Authority Areas with the Highest Number of E Rated Neighbourhoods

Local authority	Number of neighbourhoods	Number of neighbourhoods by rating				
		A	B	C	D	E
Birmingham	132	7	36	33	28	28
Lambeth	35	0	2	0	5	28
Tower Hamlets	32	0	2	0	2	28
Haringey	36	0	5	0	4	27
Manchester	57	0	6	7	19	25
Liverpool	61	5	13	8	12	23
Newham	37	0	5	0	9	23
Southwark	33	0	3	1	6	23
Islington	23	0	0	0	0	23
Leeds	107	16	23	26	20	22
Lewisham	36	0	3	0	11	22
Wandsworth	37	0	5	0	11	21
Camden	28	0	3	0	4	21

Extracted by RedFrog from table on page 42

The study further notes (on page 24) that the current amount of green space in the borough is not enough for the whole of the borough and its residents to benefit from the estimated night-time cooling effect of up to half a degree (>0.5°C).

Gardens for Tree Planting

Camden's draft Tree Planting Strategy observes that the amount of space available for tree planting in Camden is just 10.7% of the land area (based on sources including OS and Google Maps). This space would enable the planting of just 400

trees per annum across the whole borough. However, the available space rises to 25%, if the area of private gardens is also taken into account.

Gardens for Attenuating Surface Water Runoff

Environment Agency data show that surface water flooding is a medium risk in some streets of the Neighbourhood Plan area and a high risk further downstream in West Hampstead

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=526094&northing=185280&map=SurfaceWater>

Thames Water has modelled the impact of London's projected population growth and climate change on its foul and combined sewers to understand how they'll cope with these future challenges. It shows that for a relatively common rainfall event in 2050 (one expected on average once every other year), some areas of London wouldn't have enough drainage or sewerage capacity to manage the expected flows. This would lead to an increasing risk of surface water and sewer flooding.

Figure 1 below shows the mapped output of this modelling for the 2050s. Areas in red on the map are where the projected flows in the system exceed capacity and some flooding would be expected.

Although the project lies just outside the red areas to the south and west of Camden, the sewer it would attenuate the flows into, discharges downstream into those areas.

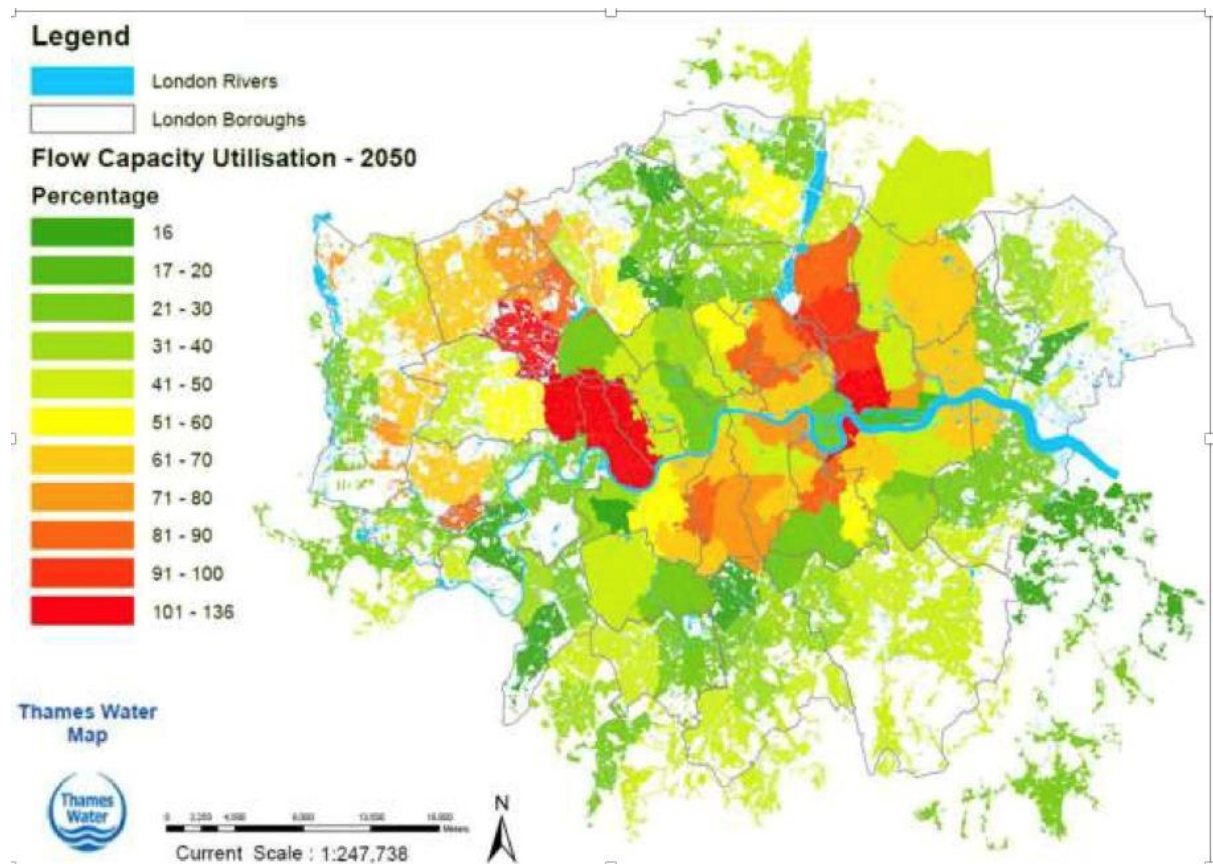


Figure 1

Therefore, rather than promoting garden building, gardens should be valued and preserved for their many environmental and ecological benefits.

The meaning of 'significant' reduction in garden space, will depend on the specific circumstances. Factors to consider could include:

- quantification of the area being lost, including consideration of that area as a proportion of the overall soft natural garden space and previous extension(s) and garden building and areas of hard surface;
- the impact on the open character of the garden and wider area;
- loss of specific features, such as trees and hedges.

This could be added in the Application section, perhaps.

Given the great importance of gardens, the policy aims to avoid further net loss of soft natural garden space.

6. [Is there any further information or evidence to justify the 4m and 2m gaps identified in Policy SD 5 iv?](#)

A house-by house photographic survey of all the properties, front boundary treatments and gaps between each property was conducted in summer 2011 (as referred to in attached meeting notes). The minimum gaps of 2 metres are fairly typical for the Crofts (sub area 2 of the 2003 Conservation Area Statement and Guidelines) and the 4-metre gaps exclude non-original side extensions and garages. However, original gap widths vary considerably, notably for detached houses, and can be less or as much as 10 metres and substantially more for some houses.

Question 4 of the Vision and Objectives survey is also relevant.

7. [Is there any further information or evidence to justify the buffer/tree root protection zones identified in Policy BGI 2 v?](#)

This is set out in table 2 of British Standard 5837 (as attached).

8. [Is there a list of the facilities to which Policy CF 1 applies?](#)

Earlier versions of the Neighbourhood Plan had listed the existing cultural, leisure and tertiary education facilities:

- a) Camden Arts Centre and its indoor and outdoor café,
- b) West Heath Lawn Tennis Club,
- c) St. Luke's Church,
- d) St. Andrew's Church,
- e) Craxton Studios,
- f) UCS Active, with community access to its gym, swimming pool, exercise classes and tennis courts,
- g) Hampstead School of Art and its café.

9. [What is the definition of "community facilities" and "home worker facilities" in Policy CF 1](#)

The Plan seeks to support the Area's growth and employment through the provision of community facilities to assist home workers (new use class E), families and the

elderly (new use classes F.1 and F.2). It is the intention that this Policy will promote community cohesion, while supporting economic growth and resilience.

Community facilities

The area has a long-established use as a tertiary education and cultural hub, notably in Kidderpore Avenue and Arkwright Road. These important valued community facilities are consistent with the cultural interests of residents, as confirmed by responses provided to the Vision and Objectives survey of 2015-16.

A question on potential uses for Kidderpore Hall (prior to its sale) found the greatest level of support (from a range of options) for educational use, e.g. by the University of the Third Age (79% agreement) and cultural events e.g. film screenings (78%), followed by a café (63% support), other entertainment (57%) and a crèche (57%).

Home working

The Redington Frognal Area benefits from high internet speeds and good transport links. The 2011 Census for the Redington Frognal Plan area shows that 23.3% of men aged 16-74 and 13.3% of women aged were classified as self employed in 2011.

The Vision and Objectives question on home working suggests a high incidence of home working: 51% of the 150 respondents answering this question stated that they live in households where one or more people work from home, including 25% where two or more people work from home.

Home worker facilities might include space for shared business / co-working space eg:

- the provision of meeting rooms and venues, available for hire
- desk space, available for hire
- incubator, accelerator and co-working spaces for start-up, micro and small businesses.

10. [Is the list of priorities for use of the community infrastructure levy in Policy CF 2 in priority order and how is this list supported by Evidence Base Document \(132\)](#)

The Vision and Objectives Survey (Evidence Base Document (132)) was supplemented by (attached) follow-up surveys in April 2017 and October 2018. The list is not in priority order.

11. [Is the scope of Policy FR limited to the shopfronts at 166-200A and 250 Finchley Road or do parts of the Policy apply more widely?](#)

Currently, the only shopfronts in the Neighbourhood Plan area are those at 166-200A and 250 Finchley Road. Other Finchley Road properties are in residential use or, occasionally, office use (eg Allied Irish Bank at 202 Finchley Road).

12. [Is there a more precise address for the traditional shopfronts at 250 Finchley Road?](#)

Ground floor units 1-6 at Palace Court, 250 Finchley Rd, London NW3 6DN