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2023/2430/P	David Pope & Donna Boldarin	05/07/2023 10:16:53	OBJ	<p>We would like to object to Planning Application Number 2023/2430/P (application to expand the ESCP business school located at 527 Finchley Road NW3 7BG) on the following grounds:</p> <ol style="list-style-type: none">1. ESCP is unreasonably attempting to push through a quick planning approval without full procedure (including a proper Section 106 Agreement). ESCP acknowledges that this initial planning application is the precursor step to a much larger more invasive plan to expand the ESCP campus, so planning permission should be refused until the impact of the whole development can be considered and a proper S 106 Agreement put in place.2. ESCP's proposed portacabin building is not of sufficient quality of design to comply with the Camden Local Plan section 7.2 or the Fortune Green & West Hampstead Neighbourhood plan (Policy 2 set out in Section 4).3. ESCP's proposed development impacts the neighbourhood in terms of loss of open space (Camden Local Plan section 6.37/Policy A 2); and violates Camden Local Plan section 6.2) by causing noise and loss of privacy to the neighbourhood.4. ESCP has directly lied to Camden Council about the community's reaction to its proposed development in its 'Statement of Community Involvement'. ESCP has also omitted documents that it said would be part of that 'Statement of Community Involvement'. Finally in its 'Planning Statement' and other documents ESCP has provided misleading information to Camden Council.5. ESCP is not a school that benefits the Camden Community – it is a European school catering to foreign students who are in London temporarily (a year or less). ESCP is not a place that educates or improves the quality of life of the local West Hampstead or Camden community. ESCP is not the type of school that the Camden Local Plan section or the Fortune Green & West Hampstead Neighbourhood plan is seeking to encourage to expand.6. ESCP is proposing the cheapest and easiest development, and is not concerned to minimise the impact to the neighbourhood. <p>The above six objection points are expanded on in Sections 1-6 following. We have also emailed the planning department with documents supporting the objection as these could not be annexed to the online comments.</p> <p>Supporting arguments for Section 1</p> <p>ESCP is unreasonably attempting to push through a quick planning approval without full consideration (including a proper Section 106 Agreement).</p> <p>(a) ESCP asks for planning permission to be granted quickly, with concessions such as no requirement for a Construction Management Plan or S106 Agreement, because it needs to have the buildings constructed for a January 2024 intake of 100 new students.</p> <p>(b) At clause 1.6 of its Planning Statement ESCP says there will be</p>

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'100 additional students due to the intake of students in January 2024. Therefore, it is imperative that the application is determined by the end of October 2023, in order to allow for the temporary building to be in place by January 2024'.

And at clause 5.5 it says

'It is imperative that the School receive permission on this application by the end of October 2023, in order to allow for the six-week build programme necessary to ensure that the building is in place prior to the January 2024 intake of students. A S106 agreement would delay this process'.

(c) However the following points can be noted

(i) ESCP has long known that to increase student intake it needed more space. It knew it at least as far back as 2020, when it engaged the neighbourhood in a prior public consultation to discuss increasing the student body and expanding the school. Further, the Design and Access Statement shows that the prior planning history includes '2020/0508 - application for double storey Portakabin - application withdrawn'. Given the above history, to ask for concessions or an expedited time frame in the planning process to account for a situation ESCP has known about for at least four years, is patently ridiculous.

(ii) ESCP states at clause 2.9 of the Planning Statement 'However, the School is suffering from a limited supply of classroom and study space which is struggling to meet the demands of their increasing student population', as if the increase was created by external forces. ESCP is entirely in charge of its own intake. ESCP has deliberately accepted an intake of students it cannot accommodate, and is trying to pressure Camden Council to grant a planning application on an expedited basis without safeguards like a S106 Agreement. ESCP should have waited to see if it received planning permission BEFORE increasing its intake beyond its capacity. ESCP should not be rewarded for this arrogant behaviour.

(d) Further, ESCP asks for this portacabin development to be approved quickly and without a S106 agreement because of the minimal impact of the development. Per the Planning Statement

'The proposals are minor in scale and will [neither] harm residential amenity... [sic] (Clause 7.7).

"there will only be 100 additional students due to the intake of students in January 2024... (Clause 1.6)

'The proposed new classrooms will be closed over the weekends, which will minimise any noise disruption to the neighbours'. (Clause 4.9)

'The proposed built form is limited in its height, size, and massing, as is demonstrated on the accompanying visuals. Therefore, it is considered that the size of the proposals remains sensitive to the height of existing buildings within the immediate setting and will thereby preserve strategic and local views'. (Clause 7.17)

But this application cannot be viewed by the Camden Planning Department in isolation, as ESCP acknowledges it is the first step in a much larger plan.

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(e) "There is an old Arab proverb that says "If the camel once gets his nose in the tent, his body will soon follow."

This initial application is simply the ESCP camel sticking its nose into the tent. ESCP has stated in its Planning Statement its intention for a large scale expansion that will potentially include multi-story buildings (or digging out basements) and a large increase in student population. ESCP says

"ESCP London is now proposing a significant redevelopment of its premises" and "Importantly, the London campus aim to increase its student population" (Planning Statement Foreword)

"The expansion programme will address, for the long-term, the shortages of student teaching space, quiet study and collaborative rooms as well as well-being facilities for both staff and students such as extended cafeteria and recreational spaces" (Planning Statement Foreword)

"It is also the Schools intention to engage with the Council to work towards the submission of an application for permanent solution for additional classroom, quiet study space and facilities enhancement (recreational space and cafeteria). Therefore, this application provides a short-term solution for the School to meet the demands of their growing student population" (Planning Statement Clause 7.12)

ESCP cannot be allowed to engage in this process of "mission creep". ESCP should file a planning application setting out its full plans before any development permissions are granted. That way Camden Council can assess the full impact on the community and (if it allows the development) it can impose the appropriate conditions through a S106 agreement and otherwise.

Supporting arguments for Section 2

ESCP's proposed portacabin building is not of sufficient design to comply with the Camden Local or the Fortune Green & West Hampstead Neighbourhood plan

(a) "We object to the fact that the proposed building will be a cheap pre-fabricated building, covered with a vinyl fake brick 'wrap'.

(b) As noted earlier, there is no reason to accommodate ESCP's desire to put up a cheap building quickly. ESCP has had plenty of time to seek planning permission for a proper building, or to find an alternate site for its school.

(c) The Camden local plan states at 7.2 "The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider

"character, setting, context and the form ... of neighbouring buildings" and
"its contribution to public realm and its impact on views and vista"

Similarly the Fortune Green & West Hampstead Neighbourhood Plan states as Policy 2 in Section 4 "All

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development shall be of a high quality of design which complements and enhances the distinct local character and identity of Fortune Green and West Hampstead and which maintains the positive contributions to character of existing buildings and structures.

(d) A temporary prefab building with a cheap vinyl 'brick' wrap clearly does not meet the above criteria, and is not consistent with the neighbourhood or the nearby conservation zone or the locally listed buildings that form part of the existing ESCP campus.

(e) ESCP can afford to find an alternate site, or go through the planning process properly and build a permanent building that fits the neighbourhood. While ESCP makes much of its charitable status, it is a highly profitable wealthy organisation and is not financially constrained.

ESCP's website shows that the fees for those entering the two-year programme in September 2023 are set at:

- ✦ £20,800 for EU citizens per year
- ✦ £24,600 for non-EU citizens per year

And the Planning Statement at Clause 2.8 notes 'Significant re-investment of the Group's profits into the campuses (teaching and student facing working and recreational working spaces) - Paris and Torino benefiting from a £80m and £35m redevelopment within the next three years'. [sic]

(f) In justifying this cheap building, ESCP also states at clause 7.19 of the Planning Statement 'The Site is not located within a Conservation Area and there are no heritage assets in the surrounding vicinity'. However, as the Design and Access Statement notes in section 2

'Camden has recognised the architectural and townscape significance of these buildings [the ESCP campus] which are 'locally listed'.

And while not in a Conservation area, the border of the ESCP campus on Parsifal Road is where which the Conservation area begins, so ESCP is directly adjacent to a Conservation area.

(g) We also note the following. In considering approval of a small rear extension to the property owned by David Pope and Donna Boldarin at 52 Burrard Road (which is immediately next to the raised area where ESCP proposes to put its portacabin), the application was initially refused because 'the proposed materials would not be of a similar appearance to those used in the construction of the exterior of the existing dwellinghouse'. In making this comment Camden Council noted that although not in a conservation zone, 52 Burrard Road was adjacent to a conservation zone, so it was important to keep the integrity of buildings in the neighbourhood.

Camden Council should hold ESCP to the same standards it holds the local residents. A vinyl clad portacabin will not fit the neighbourhood.

Supporting arguments for Section 3

ESCP's proposed development impacts the neighbourhood in terms of loss of open space (Camden Local

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Plan section 6.37/Policy A 2); and violates Camden Local Plan section 6.2) by causing noise and loss of privacy to the neighbourhood.

(a) In clause 6.2 of the Camden Local Plan it states that 'the Council will seek to protect the quality of life of occupiers and neighbours', and 'seek to ensure that the amenity of communities, occupiers and neighbours is protected'.

Factors considered in that analysis include 'visual privacy, outlook' and 'noise and vibration levels' and 'sunlight daylight overshadowing' and 'transport impacts'.

(b) At Clause 6.37 (as part of Policy A 2 – Open Space) the Camden Plan goes on to say 'Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area.'

(c) These issues can be addressed in turn.

(i) Visual privacy/outlook/sunlight daylight and overshadowing

ESCP proposes to build two cheap portacabin classrooms to completely cover an area that has always been vacant. This will detrimentally impact the view of the neighbourhood. Moreover in Section 4 of ESCP's Design and Access Statement there is a photo showing the place where students will enter and exit the new classrooms. The photo clearly shows that the bedroom windows of the houses at 50 and 52 Burrard Road, will be directly visible to the thousands of students each day who will now be utilising this part of the ESCP site. Further, these portacabins are the first step in a larger expansion. If ESCP constructs a two story building on the site, all privacy will be lost in these two residences, and likely also the residence at 2 Parsifal Road. As the Daylight and Sunlight Summary attached to ESCP's application shows, at an approximately 18 degree angle of elevation on the ESCP site, all windows (including ground floor) in the properties located at 50 and 52 Burrard Road would be overlooked and viewable from a building on the ESCP site, and at a 25 degree angle, sunlight will be blocked and overshadowing will occur.

(ii) Noise

In addressing noise from the site, ESCP's comments are extraordinarily self-centred. First ESCP says

'The noise impacts of the development will be limited, by virtue of the fact that the majority of construction activities will take place offsite and will take place during the school holidays.

This sums up ESCP's selfish attitude. The fact that the building takes place in the school holidays means the noise will not disrupt ESCP. It will of course still disrupt the neighbours.

ESCP goes on to say

'The development will also incorporate design and building fabric measures to ensure the impact of any external sources on internal ambient noise levels are within acceptable limits'.

Simplifying this, ESCP says it is designing the building to ensure that 'external' (neighbourhood) noises don't

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unacceptably impact the 'internal ambient noise' (the noise in the classroom). Again, ESCP is simply concerned about how the neighbourhood noise affects it, not how its noise affects the neighbourhood.

ESCP deliberately ignores the biggest noise issue, namely that the development will be accessed by students moving across the open ground to enter and exit the classrooms. The latest document filed by ESCP (Proposed site plan Rev b2) even shows a path being built immediately next to the boundary of 52 Burrard Road. The two classrooms hold 80 students each. Assuming 60 minute classes and 8 classes per room per day, 160 students will enter and 160 students will exit the classrooms 8 times a day (and will no doubt linger on the rear section). That is 2,560 students per day making noise in an area where currently no one is present.

While ESCP says the classrooms will not be used on weekends, that could change in the future (and certainly will when ESCP undertakes its larger development).

(iii) Transport and other infrastructure

ESCP has provided a transport analysis as part of the planning application. It claims there will be no impact on transport in the West Hampstead area. Yet it ignores that

A. the transport services are already overcrowded and over utilised with some 16.8 million people using the train stations in West Hampstead as far back as 2013 (Fortune Green & West Hampstead Neighbourhood Plan. Policies O4 - D2, D4, D5 & D6. Also refer Transport Table (same section) provided by TfL ORR).

B. The significant development in the West Hampstead Growth Area (including 800 new residences) will pressure these facilities further.

C. In rush hour the 113 and 13 buses, which many ESCP students use, are already stretched to capacity.

The development of the West Hampstead Growth Area means a lot more residents living in the area, while a large Sainsburys, an Aldi, a Homebase and other amenities are being lost. With this development occurring, other non-beneficial development in West Hampstead (like the ESCP expansion) must be limited to prevent an undue strain on all community facilities.

(d) We also note that in 2018 David Pope and Donna Boldarin received permission to erect a small garden shed (2m deep x 3.5m wide x 2.5 m high) in their yard. This shed sits approximately 25 feet from where ESCP proposes to site its portacabin. In granting permission Camden Council noted

'The outbuilding hereby approved shall only be used for purposes incidental to the residential use of 52 Burrard Road and shall not be used as a separate independent Class C3 dwelling.

Reason: To ensure that the future occupation of the outbuilding does not adversely affect the amenity of immediate area by reason of noise, traffic congestion and excessive on-street parking, in accordance with policy A1, A4 and T2 of the London Borough of Camden Local Plan 2017.'

If Camden Council was concerned about "noise, traffic congestion and excessive on-street parking" caused by a small garden shed, surely it must have the same concerns about buildings that see approximately 2560

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people exiting and entering per day.

Supporting arguments for Section 4

ESCP has directly lied to Camden Council in its 'Statement of Community Involvement'. In other places ESCP has supplied misleading information to Camden Council.

(a) In section 3.1 of the 'ESCP- Statement of Community Involvement' filed as part of the Planning Application and again in Section 3.7 (Feedback Form) BECG (as agent for ESCP) states 'BECG has received one feedback form'.

(b) BECG goes on to say

'What the single response form showed is that, whilst there was neutrality towards the design of the school and how the project would benefit the local community, the respondent recognised the need for the expansion and supported the overall proposals. The respondent provided no extra comments in the comments box provided in the form'.

(c) At least one of those statements is an outright lie.

(d) Donna Boldarin and David Pope of 52 Burrard Road submitted a feedback form by email on June 1, 2023 at 15.29. This feedback form very clearly objected to the Planning Application in the strongest terms and provided specific reasons for the objection. Mr Pope obtained a report from Michael Penny, an IT consultant, to confirm the email containing his and Ms Boldarin's Feedback Form was received by BECG.

(e) Therefore BECG is telling one of two lies

(i) Either more than one Feedback Form was received, and BECG is deliberately ignoring Ms Boldarin and Mr Pope's Feedback Form when reporting the community response to the Camden Council; or

(ii) If BECG only received one Feedback Form, then it was Ms Boldarin and Mr Pope's form, in which case BECG is completely misrepresenting to the Camden Council Planning Department what the Feedback Form said.

(f) As they could not be attached here, we have emailed to Camden Council (at planning@camden.gov.uk)

(i) a copy of Ms Boldarin and Mr Pope's feedback form, (ii) a copy of the transmittal email, and (iii) a copy of the IT report showing the email was received.

(g) In section 5.0 of the 'ESCP- Statement of Community Involvement', BECG also states

'It is clear from the consultation responses that there is no excessive opposition to the proposed extension on the site'.

(h) Again this is simply untrue. Ms Boldarin and Mr Pope's strongly opposed the extension in their Feedback form, but they also opposed it vigorously on the initial zoom consultation. Moreover every person on the initial zoom consultation, also strongly opposed the extension. What BECG has provided in terms of a summary of questions and responses from that zoom consultation is a self-serving sanitised report of the on-line meeting

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designed to mislead Camden Council.

(i) Another document submitted to Camden Council is one entitled 'Planning Statement'. In the Foreword to the Planning Statement, the ESCP Dean says the following about ESCP

'It [ESCP] also quickly became an essential part of the local community and continues to create links with the local businesses, charities and networks of the West Hampstead vicinity'.

(j) This statement is misleading. ESCP has only ever reached out to the community when it has wanted to expand (because it is required by the planning process). ESCP has not been in contact with its neighbours from 2020 when it first contemplated expansion until now when, once again, the planning process requires it to reach out. ESCP is an insular institution, focussing on temporary UK visitors and its own European vision, entirely out for its own interests, and it does not connect with or contribute to the local community.

(k) The Dean of ESCP says this in the Foreword to the Planning Statement:

'With new extended facilities (subject to design and planning consent), our vision is to increase our community outreach and numerous local partnerships that we have already formed for the greater benefit of our immediate Camden community. This will be by ...welcoming 1st generation students or students coming from poorly represented minorities in our premises and providing them with onsite assistance around their aspiration to continue their education. Pursuing our educational and outreach mission, we will also run workshops in the local schools on themes which are close to our hearts, such as responsible management and leadership, entrepreneurship and finance. Finally, to give a chance of a brighter future to meriting students coming from disadvantaged backgrounds, we will open a Camden scholarship programme where we will be part funding our Bachelor fee for two exceptional Camden pupils'.

(l) The new extended facilities are proposed to be two 80 seat portacabins. The addition of these two portacabins cannot possibly be the difference between ESCP undertaking the above activities or not undertaking them. If ESCP was truly community minded, these activities would have been undertaken in the past, and scholarships would have already been offered to local residents. ESCP promises these benefits for the future, not because it is interested in aiding the community, but simply as a 'bribe' to try to get Camden Council to permit ESCP's unwarranted expansion. We hope the Council will see through this charade, and views ESCP's statements with a great deal of suspicion.

(m) BECG also says at clause 7.19 of the Planning Statement and clause 2.1 of the 'Statement of Community Involvement' the Site does not sit within or adjacent to a conservation area. That is again untrue as the site sits immediately adjacent to a conservation area.

(n) Finally, the documents filed by ESCP are incomplete. For instance in the Statement of Community Involvement in section 3.8 headed 'Stakeholder Engagement', BECG says

The project team met with several stakeholders through the pre-submission stage to discuss the proposals. Virtual meetings were held with the following stakeholders:

† A stakeholder meeting with Cllr Danny Beales and Daniel Pope was held on Monday 22nd May (see meeting

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				<p>minutes). However no meeting minutes are attached, and the community is unable to see what Daniel Pope and Danny Beales said.</p> <p>(o) Similarly Appendix two to the Planning Statement which promises student feedback as to why expansion is needed, is left completely blank.</p> <p>Supporting arguments for Section 5</p> <p>ESCP is not the type of school that the Camden Local Plan seeks to encourage to expand. ESCP does not educate or improves the quality of life of the local West Hampstead or Camden community.</p> <p>(a) In clause 1.7 of the Planning Statement, and at other places in its filings, ESCP states in support of its application to expand the ESCP campus that 'Camden's local planning policies and the Government's economic, environmental, and social planning policies as set out within the Camden Local Plan (2017) and National Planning Policy Framework (NPPF) (2021) respectfully, attach significant importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities'.</p> <p>(b) In Clause 7.5 of the Planning Statement ESCP says "The London Plan (2021) and Camden Local Plan (ILP) (2017) recognise the need for Camden's future growth to be accommodated by facilities and services that support the local community. In particular, the London Plan (2021) supports proposals to enhance existing educational facilities. The Local Plan recognises that the borough's community facilities provide opportunities for people to meet, learn, socialise and develop skills and interests, and by doing this, help to improve their quality of life'.</p> <p>(c) While the above statements are true, what the Planning Application ignores is that by ESCP's own admission, ESCP is not a school 'designed to meet the needs of existing and new communities' in West Hampstead or Camden or indeed in the UK, and is not a facility that functions 'to support the local community'.</p> <p>(d) In section 2.5 of the Planning Statement ESCP boasts 'Students come from all over the world, with greater proportions of students from India, China, and the USA every year. The majority of the student's nationalities remains European. All programmes are multi-campus, and to graduate, students must study on at least two or three campuses'.</p> <p>(e) In clause 2.7 of the same document ESCP acknowledges that only 12.5% of students remain in the UK (much less the borough of Camden or West Hampstead).</p> <p>(f) Further, clause 2.6.5 of the Transport Statement forming part of the application states 'Additionally, following discussions with the school it is noted that due to the nature of the school itself, which predominantly comprises of international students, the students do not tend to own bicycles as they attend the</p>

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school for short periods (sometimes only a year), before leaving the UK¹.

(g) We would be surprised if a single permanent resident of West Hampstead (or even Camden) attends the school. ESCP students do not settle and remain in the local community. There is no benefit to the community in allowing ESCP to expand. Despite its current efforts to convince the Council otherwise with an offer of two local scholarships, ESCP is by its own admission designed solely to promote 'the delivery of the European model of ESCP' (Planning Statement Foreword) to a transient wealthy international population. Camden Council must protect the amenity of the local community over providing an expensive education to wealthy foreigners who are in the UK for, typically, one year.

(h) The portacabins are not places where the local community can 'meet, learn, socialise and develop skills and interests' or 'improve their quality of life'. They are places where foreign students, in the UK for a short period and not part of the local community, can receive a business education.

(i) As ESCP notes, the Finchley Road site constructed in 1887 has long been associated with education – firstly as the Hackney Theological College for some 90 years, then as accommodation and administration buildings for the Open University. These were discreet and contained uses, appropriate to a residential area, and in all that time the rear part of the ESCP site has never been developed.

(j) We have no objection to (indeed welcome) the school in its current size remaining in the neighbourhood. However the concept of a large school with a greatly increased student body with the attendant disruption to views, light, increased noise and pressure on local facilities is not appropriate in a residential neighbourhood. If ESCP wishes to expand in this manner it should find a new site. It might be different if ESCP was a local school educating and providing services to the local community – something encouraged by the Camden and Fortune Green and West Hampstead Development plans. But ESCP is not such an institution. The sole benefit here is to the wealthy ESCP and to temporary foreign students. The detriment is to the local community.

Supporting arguments for Section 6

ESCP is proposing the cheapest and easiest development possible, and is not and is not concerned to minimise the impact to the neighbourhood.

(a) While we do not think the development should be permitted at all, if Camden Council decides to allow it, then the development should be planned so as to minimally impact the neighbourhood (for all the reasons previously stated). Currently ESCP has made no efforts to do that.

(b) As discussed in section 2, ESCP is a very wealthy organisation. Yet ESCP is proposing a hurried cheap development. In part, that is demonstrated by the cheap portacabin (discussed in section 2). But it also includes how ESCP proposes to situate the building on its land.

(c) As is shown in the following documents forming part of the Planning Application

- (i) document 2313 P 602 Existing Section and Elevation; and
- (ii) Section 4 of the Design and Access plan (site photograph),

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there is a significant empty rear section on which ESCP could build. Part of that section is at street level, part is raised 1.5 meters. If ESCP either built on the lower section OR dug out the raised section down to street level, the buildings would be less visible and less impactful. But instead ESCP is choosing the cheapest and easiest option of simply building on the raised section, without caring that this will have a greater impact on neighbours. Indeed in the initial zoom consultation ESCP acknowledged that it had not even explored if it was possible to lower the raised area.

(d) On Parsifal Road all the buildings are located close to the street, with vacant or tree filled yards to the rear to allow sunlight, air, privacy and quiet. This is part of the beauty of the neighbourhood. ESCP could alter its plan to construct its buildings closer to Parsifal Road and move the parking to the rear of the site (which with very few spaces, and little traffic movement would be much preferred). But despite its claims to be concerned about its neighbours, ESCP is simply choosing the cheapest easiest option for itself.

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2023/2430/P	Fenella Nicholas & Richard Proctor	05/07/2023 21:03:53	OBJ	<p>Planning Application 2023/2430/P - Application for building 2 modular/Portacabin buildings at the ESCP Business School located at 527 Finchley Road, NW3 7BG (the Application)</p> <p>I make this objection to the Application on behalf of Richard Proctor and Fenella Nicholas at the Ground Floor Front Flat, 2 Parsifal Road. I have read the objection to the Application of David Pope and Donna Boldrain at 52 Burrard Road (Appendix 1) and adopt and repeat all of the objections raised by them as part of my own objection. In addition to the objections raised at Appendix 1, I further object as follows:</p> <p>2 Parsifal Road is located in the West End Green/Parsifal Road Conservation Area. The boundary of the Conservation Area is on the fence line between our property and the ESCP Business School at 527 Finchley Road. The Redington and Froggnal Conservation Area boundary is also on the side of the ESCP Business School on Finchley Road.</p> <p>Notwithstanding that ESCP is on the boundary of two Conversation Areas, it must nevertheless take into consideration the related guidance in respect of the Conservation Areas when making its Application. If the guidance is followed, the Application should be in keeping with the Conversation Areas, however, this Application is patently not. ESCP has proposed to build cheap vinyl portacabins that are not in keeping with the Conversation Areas nor the guidance for building on the boundary of a conservation area. Instead, the proposed portacabins are an interim stop gap of low quality design and materials that ESCP hopes will segway them into a larger basement planning application having established, through this Application, a precedent of lower standards than should otherwise be applied. The proposed portacabins will not enhance the special character or appearance of the Conservation Area, including respecting our park like garden space, they will manifestly detract from it. Portacabins by their nature are designed to be cheap interim buildings built from low quality materials with visuals that match the low cost. Furthermore, the size, height, scale and siting of the portacabins do not achieve Camden's commitment to high quality design in accordance with CPG Design Document Jan 2021.</p> <p>The durability of the building material ESCP intend to use is also questionable which will result in significant degradation and dilapidation overtime such that the looks will materially degrade shortly after construction. The cheap vinyl cladding material is said to look like wood/brick work however the cladding will look obviously like cheap cladding and will detract from the Conservation Area including the outlook from our home and garden.</p> <p>This is only Phase 1 of ESCP's intended development of the back area of the school. In the consultation meeting on the 1st June, Sophie Hermine-Bertrand, UK Finance & Operations Director at ESCP informed me it was seeking to undertake a major basement development of the whole back area of the school with additional classroom space and a conference centre. I do not believe our 130 year old house at 2 Parsifal Road would survive such a development as it's built on clay, and a huge basement development would likely cause instability in the soil.</p> <p>ESCP has stated that its intention is that the portacabins will initially be in place for 3 years, but this could be much longer depending on any planning issues ESCP face with respect to their intended major basement planning application. ESCP obviously expect to face significant challenges to their major basement planning application which is likely why it has not made the application. This is despite ESCP's plans to expand the school going back as far back as 2018, during which time it has had ample opportunity to apply for its full</p>

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phase 2 basement works. I believe ESCP knows the difficulty it will face and is seeking to move the council forward in small steps as part of a broader strategy. It is analogous to the metaphor of boiling the frog. If you put the frog straight into boiling water it jumps straight out but if you put the frog in warm water and boil it slowly the frog doesn't realise it is being boiled alive. The Council's Planning team should be cognisant of this tactic and ensure that undesirable consequences do not follow. Rather than half baked interim measures, ESCP should put forward its full plans to be considered and decided upon.

We at 2 Parsifal Road are also very concerned about the proposed height of the building. ESCP is proposing to place the portacabins on a raised area of land that is 1.5 meters above our garden ground level. The building itself is another 3.512 metres above that such that the roof of the portacabins will be approximately 5 meters above the ground level of our garden, which will tower over our mature and established garden. What's more, the portacabins will run more than the entire length of our garden thus significantly detracting from our use and enjoyment of it. Additionally, the roof of the portacabins will be a flat grey with no effort to build it into the character of the area. This development does not make a positive contribution to the green space within the Parsifal Road Conservation area. We are also not aware that this part of the site has ever been built on.

We are also concerned that the portacabins will negatively impact the biodiversity and wildlife of our garden space with noise pollution, heat output, light pollution during the night and new water run off. The garden of 4 Parsifal Road, (L shaped and wraps around the garden of 2 Parsifal Road and is also on the ESCP boundary) has a pond which has been on the property for decades. This creates a very unique sanctuary for wildlife in the area and is a priority habitat (Habitat of Principal Importance for Biodiversity under S.41 NERC Act 2006). I believe this will require a survey by an ecological consultant as the development will be less than 100 meters of a pond.

We have lived at 2 Parsifal Road for more than 18 years. Our property is built on the Camden clay base. We already get significant movement on our building. We are concerned that the weight of a new building, including the building works themselves, so close to our home will cause movement and subsidence. We are also concerned about potential damage to our property from the portacabins being craned onto the site.

ESCP have said the buildings will be in use 5 days week, 8am-7pm with 180 students + staff. This will cause considerable noise to our quiet residential home and garden space. A building of this size and capacity will require significant services and equipment to keep it running thereby increasing noise and vibrations to nearby properties and gardens.

We already have significant noise from the students entering and exiting the ECSP premises adjacent to us. Having classrooms on our boundary will increase classroom noise and bring it into our homes. Currently ESCP said the classrooms will be accessed through their existing building but the area to the access the building is an open space carpark, which our kitchen looks onto, and the noise of 180 students entering and exiting the classrooms, including whilst in use, will carry to us.

ESCP Business School is a selective, private tertiary institution that caters to the wealthy European tertiary market who complete one year's study in London before moving on. We do not feel it contributes much to the Camden community and the Fortune Green/West Hampstead neighbourhood. I do not believe ESCP are engaging with local students in anyway that benefits Camden as per the NPPF (2021). The international students are generally an irritant to the residents of Parsifal Road. They are often loud, inconsiderate, sit on

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our wall smoking, litter the street with takeaway coffee cups and rubbish, and they dump their Lime bikes all over Parsifal Road including in front of our driveways, in car parking spots on the road and in the middle of the footpaths.

We have had an instance of ESCP students renting a flat at 2a Parsifal Road. They were continually holding parties, against the lease terms. On one occasion we had to call police as the students were jumping on the bonnets of cars parked outside 2 Parsifal Road. The students in question also put the Camden Council tax and Thames Water bills for our flat in their name, didn't pay any bills for their 2a flat, and then skipped the country without paying a penny. It took us quite some time to sort it all out.

In terms of ESCP engaging with the local community, I tried to log my interest to attend ESCP's Webinar on 30 May 2023 but received an access denied message. On 23 May 2023, I emailed the address on ESCP's invitation letter informing them of the difficulty registering and did not receive a response back. I did attend the in-person consultation on 1 June and gave my objections orally. Only one other person was in attendance. I therefore believe that ESCP has not correctly represented the views of the community when it says the feedback it received from residents was neutral towards the design, recognised the need for ESCP to expand and that there was support for the overall proposals. Nothing could be further from the truth and it is quite shocking that ESCP would be prepared to make such statements. If anything ESCP's public consultation appears to have been designed to reduce the number of participants and it seems ESCP is also prepared to ignore the feedback given to it. My neighbours and I from Parsifal Road were not aware of the consultation website. I also note that BECG mention engagement with The Fortune Green & West Hampstead Neighbourhood Development Forum but I believe they weren't aware of this development when I met with them or The RedFrog Association (Residents of the Redington Frogna Conservation Area NW3). I question that they consulted the Parsifal Road Residents Association as this is not active at this time. It is very concerning that a pre-meeting with a planning officer from Camden on 24 May considered the development acceptable given all the points made above and in the 52 Burrard Road submission.

Richard Proctor & Fenella Nicholas,
Ground Floor Front Flat,
2 Parsifal Road,
NW6 1UH.

Appendix 1 (Other than Section 6, C & D)

The objections of 52 Burrard Road from Mr David Pope and Ms Donna Boldrain.

We would like to object to Planning Application Number 2023/2430/P (application to expand the ESCP business school located at 527 Finchley Road NW3 7BG) on the following grounds:

ESCP is unreasonably attempting to push through a quick planning approval without full procedure (including a proper Section 106 Agreement). ESCP acknowledges that this initial planning application is the precursor step to a much larger more invasive plan to expand the ESCP campus, so planning permission should be refused until the impact of the whole development can be considered and a proper S 106 Agreement put in place.

ESCP's proposed portacabin building is not of sufficient quality of design to comply with the Camden Local

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Plan section 7.2 or the Fortune Green & West Hampstead Neighbourhood plan (Policy 2 set out in Section 4).
 ESCP's proposed development impacts the neighbourhood in terms of loss of open space (Camden Local Plan section 6.37/Policy A 2); and violates Camden Local Plan section 6.2) by causing noise and loss of privacy to the neighbourhood.
 ESCP has directly lied to Camden Council about the community's reaction to its proposed development in its 'Statement of Community Involvement'. ESCP has also omitted documents that it said would be part of that 'Statement of Community Involvement'. Finally in its 'Planning Statement' and other documents ESCP has provided misleading information to Camden Council.
 ESCP is not a school that benefits the Camden Community - it is a European school catering for foreign students who are in London temporarily (a year or less). ESCP is not a place that educates or improves the quality of life of the local West Hampstead or Camden community. ESCP is not the type of school that the Camden Local Plan section or the Fortune Green & West Hampstead Neighbourhood plan is seeking to encourage to expand.
 ESCP is proposing the cheapest and easiest development, and is not concerned to minimise the impact to the neighbourhood.

The above six objection points are expanded on in Sections 1-6 following. We have also emailed the planning department with documents supporting the objection as these could not be annexed to the online comments.

Supporting arguments for Section 1
 ESCP is unreasonably attempting to push through a quick planning approval without full consideration (including a proper Section 106 Agreement).
 ESCP asks for planning permission to be granted quickly, with concessions such as no requirement for a Construction Management Plan or S106 Agreement, because it needs to have the buildings constructed for a January 2024 intake of 100 new students.
 At clause 1.6 of its Planning Statement ESCP says there will be

'100 additional students due to the intake of students in January 2024. Therefore, it is imperative that the application is determined by the end of October 2023, in order to allow for the temporary building to be in place by January 2024'.

And at clause 5.5 it says

'It is imperative that the School receive permission on this application by the end of October 2023, in order to allow for the six-week build programme necessary to ensure that the building is in place prior to the January 2024 intake of students. A S106 agreement would delay this process'.

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However the following points can be noted

ESCP has long known that to increase student intake it needed more space. It knew it at least as far back as 2020, when it engaged the neighbourhood in a prior public consultation to discuss increasing the student body and expanding the school. Further, the Design and Access Statement shows that the prior planning history includes 12020/0508 - application for double storey Portakabin - application withdrawn.
Given the above history, to ask for concessions or an expedited time frame in the planning process to account for a situation ESCP has known about for at least three and a half years, is patently ridiculous.
ESCP states at clause 2.9 of the Planning Statement 'However, the School is suffering from a limited supply of classroom and study space which is struggling to meet the demands of their increasing student population, as if the increase was created by external forces. ESCP is entirely in charge of its own intake. ESCP has deliberately accepted an intake of students it cannot accommodate, and is trying to pressure Camden Council to grant a planning application on an expedited basis without safeguards like a S106 Agreement. ESCP should have waited to see if it received planning permission BEFORE increasing its intake beyond its capacity. ESCP should not be rewarded for this arrogant behaviour.'

Further, ESCP asks for this portacabin development to be approved quickly and without a S106 agreement because of the minimal impact of the development. Per the Planning Statement

'The proposals are minor in scale and will [neither] harm residential amenity... [sic] (Clause 7.7) 4.4; there will only be 100 additional students due to the intake of students in January 2024... (Clause 1.6) 4.4; The proposed new classrooms will be closed over the weekends, which will minimise any noise disruption to the neighbours'. (Clause 4.9)
4.4; The proposed built form is limited in its height, size, and massing, as is demonstrated on the accompanying visuals. Therefore, it is considered that the size of the proposals remains sensitive to the height of existing buildings within the immediate setting and will thereby preserve strategic and local views'. (Clause 7.17)
But this application cannot be viewed by the Camden Planning Department in isolation, as ESCP acknowledges it is the first step in a much larger plan.
There is an old Arab proverb that says "If the camel once gets his nose in the tent, his body will soon follow."
This initial application is simply the ESCP camel sticking its nose into the tent. ESCP has stated in its Planning Statement its intention for a large scale expansion that will potentially include multi-story buildings (or digging out basements) and a large increase in student population. ESCP says
'ESCP London is now proposing a significant redevelopment of its premises' and 'Importantly, the London campus aim to increase its student population' (Planning Statement Foreword)
'The expansion programme will address, for the long-term, the shortages of student teaching space, quiet study and collaborative rooms as well as well-being facilities for both staff and students such as extended cafeteria and recreational spaces' (Planning Statement Foreword)
'It is also the Schools intention to engage with the Council to work towards the submission of an application for permanent solution for additional classroom, quiet study space and facilities enhancement (recreational space and cafeteria). Therefore, this application provides a short-term solution for the School to meet the demands of their growing student population'. (Planning Statement Clause 7.12)

ESCP cannot be allowed to engage in this process of 'mission creep'. ESCP should file a planning application

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				<p>setting out its full plans before any development permissions are granted. That way Camden Council can assess the full impact on the community and (if it allows the development) it can impose the appropriate conditions through a S106 agreement and otherwise.</p> <p>□</p> <p>Supporting arguments for Section 2</p> <p>ESCP's proposed portacabin building is not of sufficient design to comply with the Camden Local or the Fortune Green & West Hampstead Neighbourhood plan.</p> <p>We object to the fact that the proposed building will be a cheap pre-fabricated building, covered with a vinyl fake-brick 'wrap'. ⚡</p> <p>As noted earlier, there is no reason to accommodate ESCP's desire to put up a cheap building quickly. ESCP has had plenty of time to seek planning permission for a proper building, or to find an alternate site for its school. ⚡</p> <p>The Camden local plan states at 7.2 'The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:</p> <p>character, setting, context and the form ...of neighbouring buildings) and 'its contribution to public realm and its impact on views and vista'.</p> <p>Similarly the Fortune Green & West Hampstead Neighbourhood Plan states as Policy 2 in Section 4 'All development shall be of a high quality of design which complements and enhances the distinct local character and identity of Fortune Green and West Hampstead and which 'maintains the positive contributions to character of existing buildings and structures'.</p> <p>A temporary prefab building with a cheap vinyl 'brick' wrap clearly does not meet the above criteria, and is not consistent with the neighbourhood or the nearby conservation zone or the locally listed buildings that form part of the existing ESCP campus. ⚡</p> <p>ESCP can afford to find an alternate site, or go through the planning process properly and build a permanent building that fits the neighbourhood. While ESCP makes much of its charitable status, it is a highly profitable wealthy organisation and is not financially constrained.</p> <p>ESCP's website shows that the fees for those entering the two-year programme in September 2023 are set at: £20,800 for EU citizens per year £24,600 for non-EU citizens per year</p> <p>And the Planning Statement at Clause 2.8 notes 'Significant re-investment of the Group's profits into the campuses (teaching and student facing working and recreational working spaces) - Paris and Torino benefiting from a £80m and £35m redevelopment within the next three years' [sic]</p> <p>In justifying this cheap building, ESCP also states at clause 7.19 of the Planning Statement 'The Site is not located within a Conservation Area and there are no heritage assets in the surrounding vicinity'. However, as the Design and Access Statement notes in section 2 'Camden has recognised the architectural and townscape significance of these buildings [the ESCP campus] which are 'locally listed'.</p> <p>And while not in a Conservation area, the border of the ESCP campus on Parsifal Road is where which the Conservation area begins, so ESCP is directly adjacent to a Conservation area.</p> <p>We also note the following. In considering approval of a small rear extension to the property owned by David Pope and Donna Boldarin at 52 Burrard Road (which is immediately next to the raised area where ESCP proposes to put its portacabin), the application was initially refused because 'the proposed materials would not</p>

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be of a similar appearance to those used in the construction of the exterior of the existing dwellinghouse'. In making this comment Camden Council noted that although not in a conservation zone, 52 Burrard Road was adjacent to a conservation zone, so it was important to keep the integrity of buildings in the neighbourhood. Camden Council should hold ESCP to the same standards it holds the local residents. A vinyl clad portacabin will not fit the neighbourhood.

Supporting arguments for Section 3

ESCP's proposed development impacts the neighbourhood in terms of loss of open space (Camden Local Plan section 6.37/Policy A 2); and violates Camden Local Plan section 6.2) by causing noise and loss of privacy to the neighbourhood.

In clause 6.2 of the Camden Local Plan it states that 'the Council will seek to protect the quality of life of occupiers and neighbours', and 'seek to ensure that the amenity of communities, occupiers and neighbours is protected'.

Factors considered in that analysis include 'visual privacy, outlook' and 'noise and vibration levels' and 'sunlight daylight overshadowing' and 'transport impacts'.

At Clause 6.37 (as part of Policy A 2 - Open Space) the Camden Plan goes on to say 'Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area.'

These issues can be addressed in turn.

Visual privacy/outlook/sunlight daylight and overshadowing

ESCP proposes to build two cheap portacabin classrooms to completely cover an area that has always been vacant. This will detrimentally impact the view of the neighbourhood. Moreover in Section 4 of ESCP's Design and Access Statement there is a photo showing the place where students will enter and exit the new classrooms. The photo clearly shows that the bedroom windows of the houses at 50 and 52 Burrard Road, will be directly visible to the thousands of students each day who will now be utilising this part of the ESCP site.

Further, these portacabins are the first step in a larger expansion. If ESCP constructs a two story building on the site, all privacy will be lost in these two residences, and likely also the residence at 2 Parsifal Road. As the Daylight and Sunlight Summary attached to ESCP's application shows, at an approximately 18 degree angle of elevation on the ESCP site, all windows (including ground floor) in the properties located at 50 and 52 Burrard Road would be overlooked and viewable from a building on the ESCP site, and at a 25 degree angle, sunlight will be blocked and overshadowing will occur.

Noise

In addressing noise from the site, ESCP's comments are extraordinarily self-centred. First ESCP says

'The noise impacts of the development will be limited, by virtue of the fact that the majority of construction activities will take place offsite and will take place during the school holidays.

This sums up ESCP's selfish attitude. The fact that the building takes place in the school holidays means the noise will not disrupt ESCP. It will of course still disrupt the neighbours.

ESCP goes on to say

'The development will also incorporate design and building fabric measures to ... ensure the impact of any external sources on internal ambient noise levels are within acceptable limits'.

Simplifying this, ESCP says it is designing the building to ensure that 'external' (neighbourhood) noises don't unacceptably impact the 'internal ambient noise' (the noise in the classroom). Again, ESCP is simply concerned about how the neighbourhood noise affects it, not how its noise affects the neighbourhood

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ESCP deliberately ignores the biggest noise issue, namely that the development will be accessed by students moving across the open ground to enter and exit the classrooms. The latest document filed by ESCP (Proposed site plan Rev b2) even shows a path being built immediately next to the boundary of 52 Burrard Road. The two classrooms hold 80 students each. Assuming 80 minute classes and 8 classes per room per day, 160 students will enter and 160 students will exit the classrooms 8 times a day (and will no doubt linger on the rear section). That is 2,560 students per day making noise in an area where currently no one is present. While ESCP says the classrooms will not be used on weekends, that could change in the future (and certainly will when ESCP undertakes its larger development).

Transport and other infrastructure

ESCP has provided a transport analysis as part of the planning application. It claims there will be no impact on transport in the West Hampstead area. Yet it ignores that

the transport services are already overcrowded and over utilised with some 16.8 million people using the train stations in West Hampstead as far back as 2013 (Fortune Green & West Hampstead Neighbourhood Plan.

Policies O4 - D2, D4, D5 & D6. Also refer Transport Table (same section) provided by TFL. ORR).

The significant development in the West Hampstead Growth Area (including 800 new residences) will pressure these facilities further.

In rush hour the 113 and 13 buses, which many ESCP students use, are already stretched to capacity.

The development of the West Hampstead Growth Area means a lot more residents living in the area, while a large Sainsburys, an Aldi, a Homebase and other amenities are being lost. With this development occurring, other non-beneficial development in West Hampstead (like the ESCP expansion) must be limited to prevent an undue strain on all community facilities.

We also note that in 2018 David Pope and Donna Boldarin received permission to erect a small garden shed (2m deep x 3.5m wide x 2.5 m high) in their yard. This shed sits approximately 25 feet from where ESCP proposes to site its portacabin. In granting permission Camden Council noted

'The outbuilding hereby approved shall only be used for purposes incidental to the residential use of 52 Burrard Road and shall not be used as a separate independent Class C3 dwelling.

Reason: To ensure that the future occupation of the outbuilding does not adversely affect the amenity of immediate area by reason of noise, traffic congestion and excessive on-street parking, in accordance with policy A1, A4 and T2 of the London Borough of Camden Local Plan 2017.' [emphasis added]

If Camden Council was concerned about noise, traffic congestion and excessive on-street parking caused by a small garden shed, surely it must have the same concerns about buildings that see approximately 2560 people exiting and entering per day.

Supporting arguments for Section 4

ESCP has directly lied to Camden Council in its 'Statement of Community Involvement'. In other places ESCP has supplied misleading information to Camden Council.

In section 3.1 of the 'ESCP- Statement of Community Involvement' filed as part of the Planning Application and again in Section 3.7 (Feedback Form) BECG (as agent for ESCP) states 'BECG has received one feedback form'.

BECG goes on to say

'What the single response form showed is that, whilst there was neutrality towards the design of the school and how the project would benefit the local community, the respondent recognised the need for the expansion and supported the overall proposals. The respondent provided no extra comments in the comments box provided in the form'.

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At least one of those statements is an outright lie. ⁴
Donna Boldarin and David Pope of 52 Burrard Road submitted a feedback form by email on June 1, 2023 at 15.29. This feedback form very clearly objected to the Planning Application in the strongest terms and provided specific reasons for the objection. Mr Pope obtained a report from Michael Penny, an IT consultant, to confirm the email containing his and Ms Boldarin's Feedback Form was received by BECG.

Therefore BECG is telling one of two lies

Either more than one Feedback Form was received, and BECG is deliberately ignoring Ms Boldarin and Mr Pope's Feedback Form when reporting the community response to the Camden Council; or
If BECG only received one Feedback Form, then it was Ms Boldarin and Mr Pope's form, in which case BECG is completely misrepresenting to the Camden Council Planning Department what the Feedback Form said.

As they could not be attached here, we have emailed to Camden Council (at planning@camden.gov.uk) (i) a copy of Ms Boldarin and Mr Pope's feedback form, (ii) a copy of the transmittal email, and (iii) a copy of the IT report showing the email was received. ⁴

In section 5.0 of the 'ESCP- Statement of Community Involvement', BECG also states
'it is clear from the consultation responses that there is no excessive opposition to the proposed extension on the site'.

Again this is simply untrue. Ms Boldarin and Mr Pope's strongly opposed the extension in their Feedback form, but they also opposed it vigorously on the initial zoom consultation. Moreover every person on the initial zoom consultation, also strongly opposed the extension. What BECG has provided in terms of a summary of questions and responses from that zoom consultation is a self-serving sanitised report of the on-line meeting designed to mislead Camden Council. ⁴

Another document submitted to Camden Council is one entitled 'Planning Statement'. In the Foreword to the Planning Statement, the ESCP Dean says the following about ESCP

"it [ESCP] also quickly became an essential part of the local community and continues to create links with the local businesses, charities and networks of the West Hampstead vicinity".

This statement is misleading. ESCP has only ever reached out to the community when it has wanted to expand (because it is required by the planning process). ESCP has not been in contact with its neighbours from 2020 when it first contemplated expansion until now when, once again, the planning process requires it to reach out. ESCP is an insular institution, focussing on temporary UK visitors and its own European vision, entirely out for its own interests, and it does not connect with or contribute to the local community. ⁴

The Dean of ESCP says this in the Foreword to the Planning Statement.

'With new extended facilities (subject to design and planning consent), our vision is to increase our community outreach and numerous local partnerships that we have already formed for the greater benefit of our immediate Camden community. This will be by ...welcoming 1st generation students or students coming from poorly represented minorities in our premises and providing them with onsite assistance around their aspiration to continue their education. Pursuing our educational and outreach mission, we will also run workshops in the local schools on themes which are close to our hearts, such as responsible management and leadership, entrepreneurship and finance. Finally, to give a chance of a brighter future to meriting students coming from disadvantaged backgrounds, we will open a Camden scholarship programme where we will be part funding our Bachelor fee for two exceptional Camden pupils'.

The new extended facilities are proposed to be two 80 seat portacabins. The addition of these two portacabins cannot possibly be the difference between ESCP undertaking the above activities or not undertaking them. If

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ESCP was truly community minded, these activities would have been undertaken in the past, and scholarships would have already been offered to local residents. ESCP promises these benefits for the future, not because it is interested in aiding the community, but simply as a 'bribe' to try to get Camden Council to permit ESCP's unwarranted expansion. We hope the Council will see through this charade, and views ESCP's statements with a great deal of suspicion. ↵

BECG also says at clause 7.19 of the Planning Statement and clause 2.1 of the 'Statement of Community Involvement' the Site does not sit within or adjacent to a conservation area. That is again untrue as the site sits immediately adjacent to a conservation area. ↵

Finally, the documents filed by ESCP are incomplete. For instance in the Statement of Community Involvement in section 3.8 headed 'Stakeholder Engagement', BECG says

The project team met with several stakeholders through the pre-submission stage to discuss the proposals. Virtual meetings were held with the following stakeholders:

¶ A stakeholder meeting with Cllr Danny Beales and Daniel Pope was held on Monday 22nd May (see meeting minutes).

However no meeting minutes are attached, and the community is unable to see what Daniel Pope and Danny Beales said.

Similarly Appendix two to the Planning Statement which promises student feedback as to why expansion is needed, is left completely blank.

Supporting arguments for Section 5

ESCP is not the type of school that the Camden Local Plan seeks to encourage to expand. ESCP does not educate or improve the quality of life of the local West Hampstead or Camden community.

In clause 1.7 of the Planning Statement, and at other places in its filings, ESCP states in support of its application to expand the ESCP campus that

'Camden's local planning policies and the Government's economic, environmental, and social planning policies as set out within the Camden Local Plan (2017) and National Planning Policy Framework (NPPF) (2021) respectfully, attach significant importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities'.

In Clause 7.5 of the Planning Statement ESCP says

'The London Plan (2021) and Camden Local Plan (LLP) (2017) recognise the need for Camden's future growth to be accommodated by facilities and services that support the local community. In particular, the London Plan (2021) supports proposals to enhance existing educational facilities. The Local Plan recognises that the borough's community facilities provide opportunities for people to meet, learn, socialise and develop skills and interests, and by doing this, help to improve their quality of life'. [emphasis added]

While the above statements are true, what the Planning Application ignores is that by ESCP's own admission, ESCP is not a school 'designed to meet the needs of existing and new communities' in West Hampstead or Camden or indeed in the UK, and is not a facility that functions 'to support the local community'. ↵

In section 2.5 of the Planning Statement ESCP boasts

'Students come from all over the world, with greater proportions of students from India, China, and the USA every year. The majority of the students' nationalities remains European. All programmes are multi-campus, and to graduate, students must study on at least two or three campuses'. ↵

In clause 2.7 of the same document ESCP acknowledges that only 12.5% of students remain in the UK (much less the borough of Camden or West Hampstead). ↵

Further, clause 2.6.5 of the Transport Statement forming part of the application states

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				<p>'Additionally, following discussions with the school it is noted that due to the nature of the school itself, which predominantly comprises of international students, the students do not tend to own bicycles as they attend the school for short periods (sometimes only a year), before leaving the UK'.</p> <p>We would be surprised if a single permanent resident of West Hampstead (or even Camden) attends the school. ESCP students do not settle and remain in the local community. There is no benefit to the community in allowing ESCP to expand. Despite its current efforts to convince the Council otherwise with an offer of two local scholarships, ESCP is by its own admission designed solely to promote 'the delivery of the European model of ESCP' (Planning Statement Foreword) to a transient wealthy international population. Camden Council must protect the amenity of the local community over providing an expensive education to wealthy foreigners who are in the UK for, typically, one year.␣</p> <p>The portacabins are not places where the local community can 'meet, learn, socialise and develop skills and interests) or 'improve their quality of life'. They are places where foreign students, in the UK for a short period and not part of the local community, can receive a business education.␣</p> <p>As ESCP notes, the Finchley Road site constructed in 1887 has long been associated with education – firstly as the Hackney Theological College for some 90 years, then as accommodation and administration buildings for the Open University. These were discreet and contained uses, appropriate to a residential area, and in all that time the rear part of the ESCP site has never been developed.</p> <p>We have no objection to (indeed welcome) the school in its current size remaining in the neighbourhood. However the concept of a large school with a greatly increased student body with the attendant disruption to views, light, increased noise and pressure on local facilities is not appropriate in a residential neighbourhood. If ESCP wishes to expand in this manner it should find a new site. It might be different if ESCP was a local school educating and providing services to the local community – something encouraged by the Camden and Fortune Green and West Hampstead Development plans. But ESCP is not such an institution. The sole benefit here is to the wealthy ESCP and to temporary foreign students. The detriment is to the local community.</p> <p>Supporting arguments for Section 6</p> <p>ESCP is proposing the cheapest and easiest development possible, and is not and is not concerned to minimise the impact to the neighbourhood.</p> <p>While we do not think the development should be permitted at all, if Camden Council decides to allow it, then the development should be planned so as to minimally impact the neighbourhood (for all the reasons previously stated). Currently ESCP has made no efforts to do that.␣</p> <p>As discussed in section 2, ESCP is a very wealthy organisation. Yet ESCP is proposing a hurried cheap development. In part, that is demonstrated by the cheap portacabin (discussed in section 2). But it also includes how ESCP proposes to situate the building on its land.</p>
2023/2430/P	David Pope and Donna Boldarin	05/07/2023 10:48:03	AMEND	<p>Correction to our earlier objection</p> <p>The date the Feedback Form was submitted to BECG for ESCP by David Pope and Donna Boldarin (as referenced in Section 4 (d) of our objection) was June 11, 2023 not June 1, 2023</p>