

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/2430/P	Anita Panja	10/07/2023 18:06:27	COMMNT	<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.

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).

(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.

(b) At clause 1.6 of its Planning Statement ESCP says there will be

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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. Indeed it knew it as far back as 2018 when it first proposed an expansion plan.

The neighbourhood was part of a prior public consultation in 2018 during which ESCP disclosed this, and the Design and Access Statement shows 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 five 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.

(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

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Statement its intention for a large scale expansion that will likely include multi-story buildings 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 School’s 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.
